

The scoping document, which is the only document the public will be able to comment on in a CE, discloses no information or analysis to the public. I suspect most of the public is not even aware of this large logging project. BNF has kept it hidden, with no public announcements or notices. Isn't that a violation of NEPA? Specific treatment areas along with the types of treatment, and their analysis needs to be disclosed to the public.

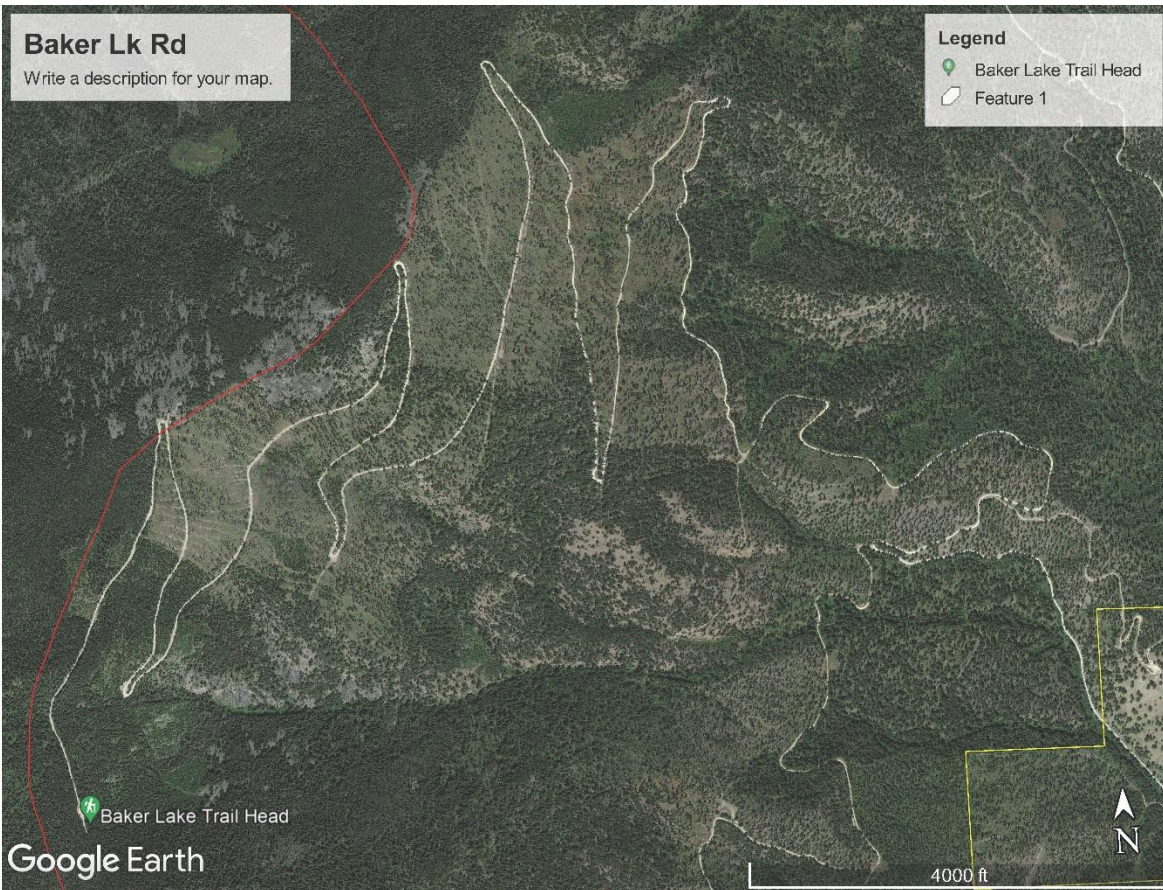
Page 2 of scoping states, "This proposed action would get ahead of those active wildfires, so that the Forest Service can take a more environmentally sound approach than is allowed during the emergency of an actual wildfire." Using a Categorical Exclusion (CE), offering no site-specific information or effects assessments, and giving the public only 14 days to comment does not make this process any more environmentally sound than when done during a wildfire situation. Disclosing a full analysis of the area, project effects, and intended actions would be more environmentally sound and would give the public the ability to make substantive comments based on site-specific information and past monitoring of similar projects. And what would stop you from implementing a logging project in a different location during a fire and calling it emergency suppression?

Because many of the roads switchback up the mountainside, some of the fuel breaks proposed are much wider than the 1000-foot limit in the CE authorization, disqualifying the project under this CE authorization. On your scoping map, there is no linear feature to follow between Christiansen and Lloyd Creeks.

There are also a number of extraordinary circumstances that also disqualify CE authorization, including the potential presence of ESA listed or proposed species like whitebark pine, grizzlies, wolverine, lynx, and bull trout.

Where are the areas of old growth that are to be protected and preserved by the E.O. on old growth and mature forests? They need to be identified and avoided.

Much of the area has already been severely degraded by past logging. For example, on the following page is a Google Earth photo of the road to the Baker Lake trailhead proposed for a "fuel break". You can see, and I know from driving that road, that most of the area has already been essentially clearcut, leaving a few scattered trees per acre. Will you know go after the scraps of timber that remain, cutting them so that (p. 3) "generally only scattered trees remain"? These will be seen as giant clearcuts by the public. It's as if we are going back to the clearcut crisis of the 1960s, with no laws or public input. It's a deplorable way to treat the public forest when there are so many people now living in the Bitterroot Valley and western Montana.



What about the effects of the project when considered cumulatively with the adjacent Mud Creek, Picquett Creek, and Bitterroot Front projects? Together these represent manipulation of almost the entire eastern face of the Bitterroot Mountain Range, without allowing for meaningful public participation on any of these.

You also state that this project will protect communities like Conner, which is 4-14 miles away. That's quite a stretch of the WUI, even for you.

In conclusion, this project is not within the scope of the CE and does not provide adequate information to allow for meaningful comment from the public. Very little information is provided and no biological assessments for effects to wildlife are included. Please rethink this project and do it in an environmentally sound way by analyzing the area and providing stand analysis and effects analysis to the public before public comment and long before the decision.