

September 14 2023

To: Matt Anderson, Forest Supervisor and District Ranger Abbie Josie

Submitted via Bitterroot National Forest Website:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64729>

Comments on the Sula Fuel Break Project

To whom it may concern,

I am disappointed in the plan to do non-commercial thinning along roads in the East Fork of the Bitterroot Drainage. This is prime bull trout spawning and rearing habitat and grizzly bears have been verified in the area just a few years ago.

The project is mostly prescribed burning and thinning in already burned terrain. The 2000 fire raged through heavily logged Darby Lumber Lands. There were no wind breaks and the area a wide-open canopy allowing all the fuels that remain to dry out. It was prime time for an extreme fire event. Why are you so determined to continue to log, dry out the forest and allow wind to have its way during a forest fire?

The communities you claim to protect are upwind of any fire in that area. What are you really trying to do here?

And scoping says if you find some big trees, you will cut them down and sell them. Did you drive the road to see if there was any commercial timber? Do you think that maybe we could learn something from these pockets of trees that survived the deluge of the 2000 fires? If you cut them down, where will the wildlife go?

You cannot predict where and when a fire might occur. So, creating "fuel breaks" ahead of time to be more "environmentally sound" makes little sense. When a fire occurs, firefighters will assess the situation, the weather, and natural fire constraints to create a fireline that is safe and practical. To try and predict these is nothing more than selling snakeoil.

Please leave the East Fork of the Bitterroot Watershed area alone. The area is just recovering from extreme fire. Let those fragile soils heal. Some of the areas have been planted. Did you do something wrong there? Why do you have to thin them only 20 years after planting?

Fenns, wetlands, and seeps are in the area. Boreal toads thrive in the Sapphires. These should be surveyed and avoided and toads should be surveyed and their habitats preserved. There should be no night hauling of any kind. There is nothing more important than wetlands during a time of drought. That is what we have in store, so we should be preparing not exploiting what we have left. It is time to take stock in what we have and cherish it. Water is life.

The Sapphires are a place I love to visit. I have enjoyed seeing the spring flowers springing up out of the burn. The forest is healing, let it heal. We have done enough damage already.

The area provides habitat for wolverine, fisher, bears, and lynx. They have little left to choose from, they need what we can preserve for them now. What about snags for Fisher and Pileated woodpeckers? The snags that remain on the landscape should be left alone. They are habitat for blackbacked woodpeckers and a plethora of biodiverse wildlife and birds. Read Hutto, and

embrace previously burned areas rather than try to “improve” them. The new growth is habitat for snowshoe hares making a place for lynx to thrive. Nature is doing its thing, let it be.

Seeps, fens and wetlands are in the area. Surveys for wetlands and a thorough analysis of the hydrology of the area should happen before public comment. The public must be informed of all aspects of a project before they comment. And why is it that we have only 14 days to comment? We know the area. We know what is at stake. Why are you leaving us out of the process of decision-making.

No new roads or temporary roads or skid roads should be created. These will mess with bull trout and Westslope cutthroat trout. Our watersheds are not only habitat for fish and a boon for the fishing industry, they are also our life. Our watersheds should take priority to fuel breaks that are merely shots in the dark.

Spend your time protecting our resources from illegal off-road motorized use. The Sapphires are getting hammered by motors. New technology is allowing them to zip past any makeshift barriers.

How will this project affect elk security?

Please rethink this project. There is no reason to get out ahead of the fire. You don't know where future fires will happen. And using a CE with 14 days of public comment is not very environmentally sound. Especially when it seems no analysis has happened. If you find areas of merchantable timber, you will make those areas commercial logging? Haven't you even looked at the area?

We were promised site specific information and stand analysis for the Mud Creek implementation meeting. We only got the proposed “treatments.” And when I asked for site specific stand analysis, I was told I should FOIA the information. Really? Did they do the stand analysis at all? Did they check to see if there was old growth? Or did they just look at the board feet available? It seems with this project, there won't even be an implementation meeting and public comment period. I guess, why pretend? You did not tell us anything about the terrain and forests in each unit at the Mud Creek implementation meeting. We were unable to access the areas during the allotted comment period, so we were flatly bamboozled. When the FS was asked to provide the stand analysis promised in project documentation, the information was not made available. I guess for this project, you are not pretending to work with the public anymore. You are just going to do it regardless of the public that own the lands you manage.

And please explain the new Forest Service plan to up the treatment acres by four times. Did the public get a chance to chime in on this new unsustainable plan by the USDA? You will be out of trees in less than ten years and then what? Things will get really hot with no carbon stores and no carbon sequestering trees. Saplings that you plant will take 80 years to replace what we have now. I think it will be too late by then. I feel sorry for our children.

We cannot log our way out of forest fires. They will happen and the more we log, the more we create extreme fire conditions. Logging dries out the forest and opens up the forest to wind. Please read Atchley et al 2021. They talk about the lack of atmospheric dynamics in Forest Service modelling. You are making our forests more fire prone. Please stop this madness.

You seem to be concerned about forest fires, but you did not shut down campfires after conditions became extreme last summer 2022? It took 11 days to shut down campfires, 11 days

of risk. The Roaring Lion Fire was started by a rogue campfire. Isn't the number one rule prevention? Why didn't you ban campfires during extreme fire conditions? We had already had a fire that summer.

Jack Cohen said with 50 mile an hour winds, all bets are off. The problem is home ignition not fuels. And quit using the Roaring Lion Fire as an example. We had 50 mile per hour winds that day. Nothing was going to stop that fire. Byron Bonnie told us at the Bitterroot Front field trip that six homes had thinned trees on their property but did not take care of the area 100 feet from their homes and the homes themselves. Those six homes burned in the fire. Thinning made no difference. Listen to the science. Listen to the evidence on the ground.

Please cancel this project. You cannot predict fires and you cannot log and burn your way out of them. People should be fire hardening their homes and working on evacuation plans. This project will only make those measures more important.

Thanks for your time,