September 14, 2023

Matt Anderson

Forest Supervisor, Bitterroot National Forest

Hamilton, MT. 59840

Dear Matt,

Thank you for the opportunity to comment on the Draft Environmental Analysis for the Bitterroot Front Project. I support the need to treat forest fuels to help reduce the risk to private property from wildland fire and to help ensure the safety of wildland firefighters. Having said this, I am concerned that the values of other natural resources may be compromised in the process. I am especially concerned that corners may be cut because of the short timeframes required by the emergency authority under the Infrastructure Investment and Jobs Act, uncertainties associated with Condition Based Analysis and Management (CBA) and the likelihood that Congress will not provide sufficient funding for all the post-treatment work that you identify in your Draft EA.

My priorities for the Bitterroot Front landscape are:

1. Plan for, provide and maintain wildlife habitat connectivity, especially between the Bitterroot and Sapphire Mountain Ranges, over time.
2. Provide vegetation composition, condition (including old growth), structure, patch size and distribution within the range of natural variation (RNV) over time.
3. Manage motorized access (travel management, seasonal closures, road obliteration etc.) to accommodate wildlife habitat security.
4. Give priority for vegetation treatment to areas of greatest risk and private landowner cooperation.

My specific comments are:

1. Provide a specific Desired Future Condition (DFC) statement for priority resources for each Project and/or Opportunity Area. This would help address concerns relating to the “how and why” vegetation treatment is necessary.
2. Give a higher priority to Habitat Connectivity. Habitat fragmentation and obstacles to the free movement of animals across all spatial scales (especially at the very large-scale between the Bitterroot and Sapphire Mountains) are critical issues to wildlife and especially here in the Bitterroot Valley where development is occurring at a rapid pace. I recommend that you create and use a “Design Feature” that is like: “RR-3 Develop timing of project activities, when practical, that are in or near high use developed recreation sites or rental facilities, or along roads that access high use recreation sites, to reduce disruptions of public use and reduce potential site closures during seasons of high use...” You could easily create a design feature that parallels this one for “Wildlife habitat Connectivity” that not only covers disturbance from project activities, but also disturbance from unrestricted motorized activities.
3. Similar to Item 1, I recommend that you provide a Table that documents the most important “Design Feature(s)” for each Project Priority Area”. This will give the public a better idea of what to expect in terms of specific treatments, activities and mitigation that will occur in the given Project Priority Area.
4. Provide timely, frequent and well-advertised updates on the results of “Field survey and consultation” and “Documentation and assessment” aspects identified in Appendix B – Implementation Process. With the uncertainties of using the CBA process, there is a greater burden on the public when evaluating the progress being made on a project of this size and complexity.
5. You should be more Specific in how you plan on monitoring the Project by developing a comprehensive Monitoring Plan. What are the protocols that will be used by Resource Area? What variable will be measured? What will be the Sampling Design? Who will do the monitoring (FS Staff? Citizen Volunteers? University Personnel? Contract Employees?)?
6. Maximize the assurance that the Monitoring Plan will be funded and implemented. Since Congress cannot be “counted on” to provide sufficient funding for the entire set of project activities, you should, as a minimum, complete the “Document and Assessment” phases of the “Implementation Process” prior to making contractual obligations for subsequent phases of project implementation.

I hope that you give serious consideration to the above recommendations as you move forward.

Sincerely,

Skip Kowalski, Wildlife Biologist, USFS, retired.