

September 15, 2023

To: Matt Anderson, Forest Supervisor  
Stevensville District Ranger Steve Brown  
Darby and Sula District Ranger Abbie Josie

Submitted via Bitterroot National Forest Website:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=57341>

To The Interdisciplinary Team and responsible official Matt Anderson,

Thank you for the opportunity to comment on the Bitterroot Front Project that encompasses 143,983 acres including most of the Bitterroot National Forest (BNF) on the West side of highway 93 from McCalla Creek to Trapper Creek.

I live in near the project area and submitted scoping comments on 5/20/2022 and I also attended a field trip for this project last summer. The concerns I raised in scoping and on the field trip have not been addressed in the Environmental Assessment (EA).

If one calculates project areas from ongoing projects and recently proposed projects including: Bitterroot Front, Gold Butterfly, Mud Creek, Eastside, Piquett, Rye Creek Fuel Break, Sleeping Child Fuel Break, Soda Baker Fuel Break, Sula District Fuel Break, Darby Lumber Lands II, Meadow Vapor, Thunder Mountain, Buckhorn GNA, The Como Project, and the Westside Project, it comes to a total of 776,667 acres of areas to be monitored for design features and mitigation measures to ensure the protection of habitat for wildlife and fisheries across the forest. This does not include the prescribed burning resurrections of School point ecoburn, Cameron Blue Ecoburn, Lower West Fork Project, or the recently resurrected Trapper Bunkhouse and Stevi West Central projects. This does not include the Forest-wide TSI project or the BNF 2003 Noxious weed project. These projects overlap, but each project has its own set of design features and mitigation measures designed for the specific project.

Considering the revolving door of employees across the forest, it would be impossible to monitor and ensure that design features and mitigations are properly followed on 776,667 acres of projects. One example would be this past spring when a citizen went hiking in the Larry Creek area and encountered herbicide spraying in progress. There were no signs warning of the action and when she called the FS office, they told her that they knew nothing of weed spraying in the area. After looking into it they “discovered” that they had a long term weed contract with the County Weed District. Signs were eventually put up, but the point is, they did not know and no one was monitoring the contract and actions. The 2022 Bitterroot Monitoring Evaluation Report (BMER 2022) admits that they have not monitored visual quality for the past 5 years because there was no landscape architect to do the monitoring. One need not be a landscape architect to see the highly visible roads created by the Westside Project (See figure ). Design features are to prevent visibility from highly travelled corridors like highway 93. When

asked about the visual quality infraction, an employee said it was the fire crews that cut trees below the road. If that is the case, the project should have been modified to reduce the number of trees cut to follow the design features. The project was implemented after the fire and there was time to modify the project.



*Figure 1 Roads visible from Highway 93 a national scenic byway*

I met a the new Southzone biologist at the Mud Creek Implementation meeting in January. He is no longer with the forest. At this time, there are no fisheries biologists to monitor endangered bull trout critical habitat and sensitive Westslope cutthroat trout spawning and rearing areas. There used to be two on the forest at all times. The one fisheries biologist we did have retired June 2<sup>nd</sup> of 2023. Project documentation on fisheries was done by the retired biologist and another biologist from Region 6 virtually. Is there an ecologist with the BNF at this time? The Bitterroot Front project will encompass nearly 144,000 acres with endangered species and critical watersheds. Who will monitor it?

An internal survey of DNR employees showed that 90% disagree with the agency's approach to logging on lands where wildlife considerations are required to come first.<sup>1</sup>

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<sup>1</sup> <https://www.startribune.com/dnr-minnesota-logging-wildlife-lands-sustainable-timber-harvest/600304587/?refresh=true>

Are wildlife a concern on the BNF? It is a resource that must be preserved and these massive logging projects with few to monitor them, will destroy biodiversity across the forest and put sensitive and endangered species in peril.

About 25-30 years ago, they predicted that the US would be out of timber in 10 years if the commercial logging continued at a high rate. Since then, timber production has slowed on public lands which has improved watersheds and habitat. According to project documentation from the Soda Baker fuels break, “the U.S. Department of Agriculture, Forest Service is establishing a strategy for working with partners to dramatically increase fuels and forest health treatments by up to four times current treatment levels in the West. This strategy can be viewed at “Confronting the Wildfire Crisis: A New Strategy for Protecting Communities and Improving Resilience to America’s Forest.” How will this strategy affect local loggers in the long term? It seems the BNF is going to go the way of Darby Lumber, cutting everything, declaring bankruptcy and running away with everyone’s pension. We are returning to the clearcut crisis, but maybe it should be called the carbon loss crisis or maybe just mass extinction.

Forest service documentation consistently claims that “overstocked forests” or dense forests are the result of fire suppression. This comes from nothing but hubris. Weather puts out fires, not people. Nacify et al 2006 did a study in the BNF and found that “overstocked” forests are the result of logging not fire suppression. So why are we continuing to log the forest to fix overstocking?

A Missoulian editorial on September 1, 2023 discussed the Bitterroot Front project emergency authorization, “Wildfire scientists, of whom Missoula has many, routinely warn we can’t log our way out of wildfire. Rather than speed up forest management by skipping public review, the Forest Service might better spend its resources planning right the first time, so it doesn’t wind up losing more **chokecherry** lawsuits for failing to listen to stakeholders.”

Project documentation claims that the public is in favor of the project. I read all of the comments from scoping and the majority of comments that were for the project because they believed the project would stop fires and stop smoke. Where did they get this idea? Maybe it is because every presentation concerning the project includes the Roaring Lion Fire including the field trip which starts at the fire site. The Roaring Lion Fire occurred during 50 mph winds and extremely dry conditions. Jack Cohen has made clear that with 50 mph winds, all bets are off. This project is to reduce fuels and reduce fire risk. Please define fuels. Denton, MT, Marshall, CO and the recent fires in Hawaii were grass fires that burned many homes, more than the Roaring Lion Fire. When you log the trees you increase grasses, mostly invasive like highly flammable cheat grass, and you increase shrubs. These are also fuels and they burn quicker and catch fire quicker than large, mature trees. Explain why logging large trees prevents fires.

Jack Cohen has made it clear that home ignitions are a home ignition problem, not a fuels problem. So why are you working to reduce trees (only one type of fuel)?

If you want to reduce wildfires, prevent them. Make stage one fire restriction mandatory at very high fire danger and make Stage two automatic with extreme conditions. The roaring lion fire occurred during extreme fire conditions. It started with a campfire. There were no restrictions even though the forest had just experienced the Observation Point fire in June. Restricting campfires is free, you can even glean funds from fines. What will the Bitterroot Front Project cost taxpayers?

If you want to reduce home ignitions, educate the public about home hardening and the inevitability of wildfires. Don't give homeowners a false sense of security by pretending to stop wildfires and smoke through commercial logging. Logging will create more conditions like Denton.

So, condition based management is to allow flexibility and adaptive management. This project will do all the commercial logging in the next three years. You will not see the error of your ways for 5-10 years. By that time, it will be too late. And will the trees regenerate in a warming climate?

This project is based in the idea that the "normal conditions" are frequent fires. Where is this assumption coming from? The answer is to somehow mimic fire with ground disturbing logging. To somehow prevent wildfires even though there is no guarantee that logging will prevent or even reduce wildfire. The excuse is written in the EA at 114-115, "future wildfires could impact wildlife and federally recognized species' habitat to varying degrees. Depending on the size and severity of future wildfires, forested habitat could be reduced in quality and quantity in the short term. Low-intensity and mixed-severity wildfire might provide for greater habitat diversity and ecological resilience in the long term, but high-severity wildfires and wildfires occurring at greater frequencies compared with historical conditions could remove or degrade wildlife habitat that would have long-term effects." So logging to mimic fire and introducing low intensity fires in the spring when fires rarely happened, the BNF is saving wildlife and habitat. What are historic conditions? If you look further back than 20 years, we are in a fire deficit.

Project documentation relies heavily on Hagmann et al 2021 literature review for historic fire information. But Baker et al 2023 found that Hagmann omitted contrary data. Collins et al 2011 failed to mention they excluded 94% of plots with denser forests. Collins et al 2011 and Stephens et al 2015 excluded abundant small-tree and high-severity records also excluded oaks. Both excluded correction data for tree density. Many century-old Forest Service records of high severity fire were omitted. Like the following, "There is timber only on four forties of this section the rest of the section has a very dense stand of brush... There are several large dense sapling stands... Severe fire went through here years ago and killed most of the trees. And another record that states, "Only nin forties have any timber at all....Fires have killed most of the timber." High severity fires are more common than the FS would like to believe. The forest is

adapted to them especially Engelmann spruce and subalpine firs as are found in the project area.

Project documentation fails to consider the carbon footprint and the carbon storage and sequestration loss that this project will create by logging mature and old growth stands. Project documentation does not analyze carbon emissions that will be caused by the project. The Forest Service must provide detailed analysis for a project of this scope and scale which uses readily available methods and models that represent high quality information and accurate greenhouse gas accounting<sup>2</sup> when undertaking environmental reviews of logging projects on federal lands. Research, including studies done by the U.S. government,<sup>3</sup> indicates that logging on federal forests is a substantial source of carbon dioxide emissions to the atmosphere.<sup>4</sup> Notably, logging emissions—unlike emissions from natural disturbances—are directly controllable. Models and methods exist that allow agencies to accurately report and quantify logging emissions for avoidance purposes at national, regional, and project-specific scales. As such, the Forest Service has the ability and responsibility to disclose estimates of such greenhouse gas emissions using published accounting methods with the express purpose of avoiding or reducing the greenhouse gas associated with logging, and acknowledge the substantial carbon debt created by logging mature and old-growth trees and forests on federal lands.<sup>5</sup>

Project must disclose its contribution to global warming from removing large trees, emissions from cutting and transporting logs, and emissions from prescribed burning. The BNF must use the best available science and recommendations from the Environmental Protection Agency (EPA) to assess carbon emissions (see exhibit 1 EPA comments on SPLAT) for this project.

Old growth is very important to the public and wildlife. It should be preserved. Site specific amendments will not preserve functioning old growth. Commercial logging and ground disturbance and a reduction in snags and coarse woody debris will degrade old growth. Research cited in the Como Project FEIS states, “There is risk associated with treating old growth and being able to retain the old growth characteristics. Some research supports treating ponderosa pine old growth and retaining the old growth characteristics and there is a **limited record of successful application**. However, retaining old growth characteristics in mixed conifer old growth following treatment is

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<sup>2</sup> Hudiburg, T.W. et al (2011) Regional carbon dioxide implications of forest bioenergy production. *Nature Climate Change* 1:419-423 <https://www.nature.com/articles/nclimate1264> Hudiburg, T.W. et al (2019) Meeting GHG reduction targets requires accounting for all forest sector emissions. *Environmental Research Letters* 14 (2019) 095005 <https://doi.org/10.1088/1748-9326/ab28bb>

<sup>3</sup> Merrill, M.D. et al (2018) Federal lands greenhouse emissions and sequestration in the United States—Estimates for 2005–14, Scientific Investigations Report. <https://doi.org/10.5066/F7KH0MK4>

<sup>4</sup> Harris, N.L. et al (2016) Attribution of net carbon change by disturbance type across forest lands of the conterminous United States. *Carbon Balance Manage*:11-24 <https://doi.org/10.1186/s13021-016-0066-5>

<sup>5</sup> Hudiburg, Tara W., Beverly E. Law, William R. Moomaw, Mark E. Harmon and Jeffrey E. Stenzel. “Meeting GHG reduction targets requires accounting for all forest sector emissions.” *Environmental Research Letters* (2019): n.pag. <https://doi.org/10.1088/1748-9326/ab28bb> Harmon et al. “Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context.” *Frontiers For. Glob. Change* (2022) <https://www.frontiersin.org/articles/10.3389/ffgc.2022.867112/full>

more uncertain.” This project plans to commercially log old growth to “retain old growth characteristics.” Research from this forest has shown that this is a risky measure. We have so little old growth. Do not risk it. The EA at 7 states, “The stands would not change the overall status of the old-growth area.” This is because you changed the definition of old growth with the site-specific amendment. Survey for old growth and leave it alone.

EA at 12 states, “Each area proposed for treatment would have a stand diagnosis completed as part of the implementation process. As part of this stand diagnosis, the criteria for old growth (habitat type, tree ages, DBH, and basal of the large trees) would be collected. The objective for treatments would be to carry these old-growth stands into the future as old growth.” This was also promised in the Mud Creek Implementation stage. Stand diagnosis and stand data was not available and when I asked for it, I was told personnel were very busy and if I wanted the information any time soon, I would have to submit a FOIA. If this and Mud Creek were not condition based, old growth data would be part of the analysis.

Project information makes it unclear what, if any old growth trees/stands of any species will be impacted. In order to comply with the forest plan, current old growth status should be mapped using stand exams and quantitative data and overlaid with proposed action areas in high resolution and in a form that the public can access. I requested this information in scoping and it was not available in the EA.

EA at 121 states, “Updating the definition of old growth would not affect the amount of habitat available for species, such as pileated woodpeckers or marten.” It would affect snags, future snags, and mature forests upon which these species rely.

The site specific amendment to change the old growth definition and suspend the snag retention standard would affect MIS species. EA at 122 states, “the abundance of snags contributes to increased fire severity.” But the EA offers no science to back up this statement. Fires thrive on green needles and the resin they contain. Snags do not have green needles or resin. They are basically rotting from the inside which is why they are so popular as nesting sites for Pileated woodpeckers, flammulated owls, black backed woodpeckers and Rocky Mountain Bluebirds. Effects analysis is lacking in the EA. The only reference is, “They [martin] appear to be fairly common and well distributed in suitable habitat across the project area (EA at 113).” Monitoring should show more than “appears” to adequately assess effects to marten. Monitoring must include population number and trends. The Old growth site specific amendment and the snag retention amendment will not protect mature forests and the habitat on which martens rely.

Sadly, the 1987 Forest Plan old growth standards protected mature forests as well. There was no age standard. Trees 20 inch dbh qualified. This protected old growth as well as mature forests. And it reduced the time needed to assess age class of old growth stands. The old growth site specific amendment creates more work for the reduced personnel on the BNF. Analysis will be minimal at best due to lack of personnel and the increased burden on assessing age class.



Whitebark pine is listed under the Endangered Species Act (ESA) but the EA claims that it is just “not feasible” to survey the project area. Could that be due to lack of personnel? Could it be due to the size of the project area? These issues would not be a problem if you slowed down, did smaller projects, thoroughly analyzed the area before the decision.

The National Forest Management Act of 1976 states that Forests are to "provide for a diversity of plant and animal communities" and requires that National Forests "maintain viable populations of all existing native vertebrate species." Project analysis should demonstrate to the public that the project and project activities comply with Forest Plan standards and objectives in accordance with the National Forest Management Act (NFMA). Site specific amendments wildlife and habitat protections abolish protections to meet this mandate from NFMA.

Intermediate cuts across the entire face will decimate Elk hiding cover. Does this project comply with the eastside assessment? Are elk at objective throughout the project area?

EA 10 states, “As outlined in the forest plan, commercial timber harvesting is an appropriate tool to move the project area toward desired conditions within Management Areas (MAs) 1, 2, 3a, 3c, and 5.” Project documents do not demonstrate compliance with management area standard for these areas.

EA at 14 states, “The monitoring protocol details resource-specific monitoring items that would occur after implementation activities to ensure design features and mitigations are achieving the intended results. This would help complement the design of subsequent treatments in the project area and help inform the design of future projects in the Bitterroot National Forest. The monitoring protocol would be a required component of the implementation process. During implementation, summarized monitoring results would be stored in the project record.” This would not be available to the public without a FOIA. This is not transparent. The public has a right to access this information. They should not have to go through the hoops of FOIA to attain it. Please show past project monitoring and how it has informed this project? The BMER 2022 seems to refute design feature success and consistent monitoring protocol.

IRAs are lands which have been reviewed by the Forest Service for possible inclusion in the National Wilderness Preservation System (NWPS). EA at 53 states, “There are 11,970 acres of priority fire treatment areas within IRA boundaries in the project area (USFS GIS 2023). Treatments would likely occur in these areas.” The Forest Service must manage these areas to preserve Wilderness characteristics and preserve Apparent Naturalness and Opportunity for Solitude-Remoteness. These roadless characteristics would be affected in this forested landscape by the proposed action. Skid trails, landing sites, and logging mature trees would change the IRAs forever. Does proposed management in IRAs comply with IRA designations on the forest (see figure 2)?

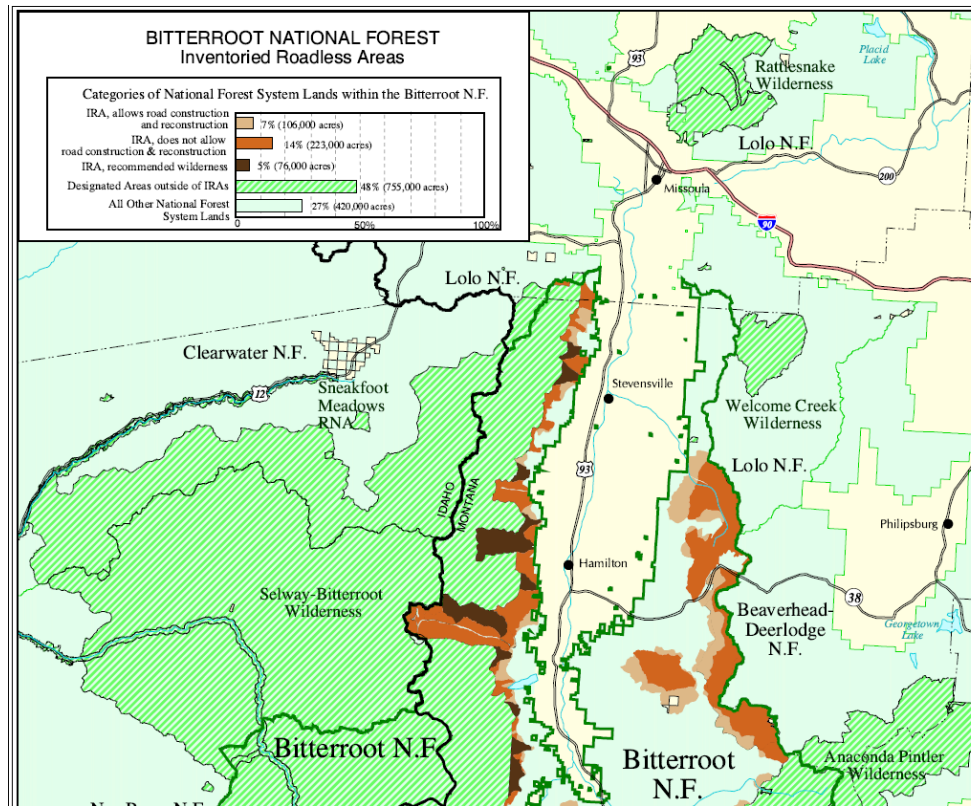


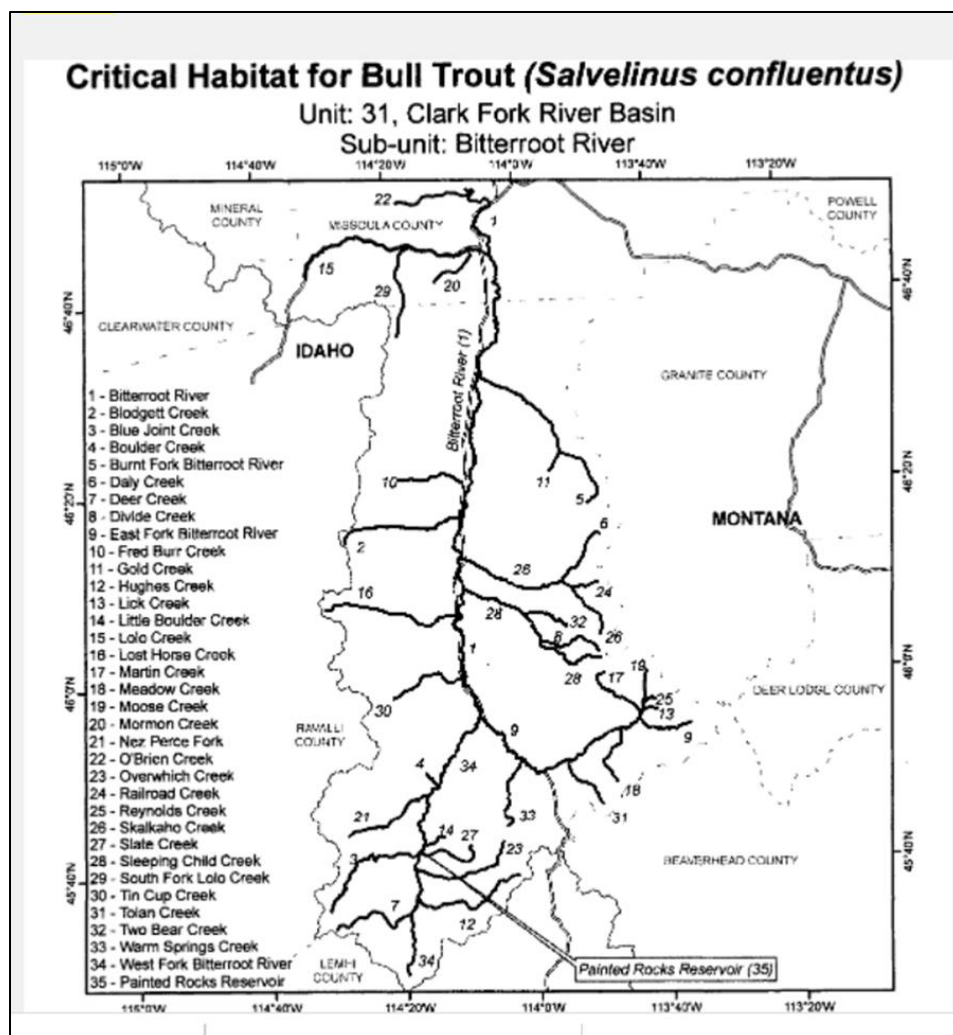
Figure 2 BNF Inventoried Roadless Area Categories

The Forest Plan standard 10 under wildlife and fish states, “[b]eaver **will** be introduced to suitable riparian habitat” (emphasis added, FP at II-20). We are not aware that any beaver introduction plan has been implemented. A map of suitable riparian habitat for beavers should be created as part of any BNF project, especially one that proposes to “seek” habitat improvement opportunities. Given the number of streams in the project area listed as impaired due to sediment, and low water flows and high temperatures in late summer, the introduction of beaver should be a priority for habitat improvement. The cost of beaver introduction compared to the value gained makes it very efficient.

There is no analysis that shows the reopening of roads, road construction and reconstruction, and procedures used to thin and burn will follow management goals to “(p)rovide habitat to mechanical support viable populations of native and desirable non-native wildlife and fish.” (FP at II-3). Endangered bull trout are present in the area as well as sensitive cutthroat trout. Grizzly bears and wolverine are also present and sensitive to roads.

Analysis found project activities are likely to adversely affect bull trout (EA at 116). Bull trout critical habitat is throughout the project (see figure 3).





*Figure 3 Bull trout critical habitat on the BNF*

The project area includes many areas of spawning and rearing habitat for bull trout, but it is depressed (see figure 4).

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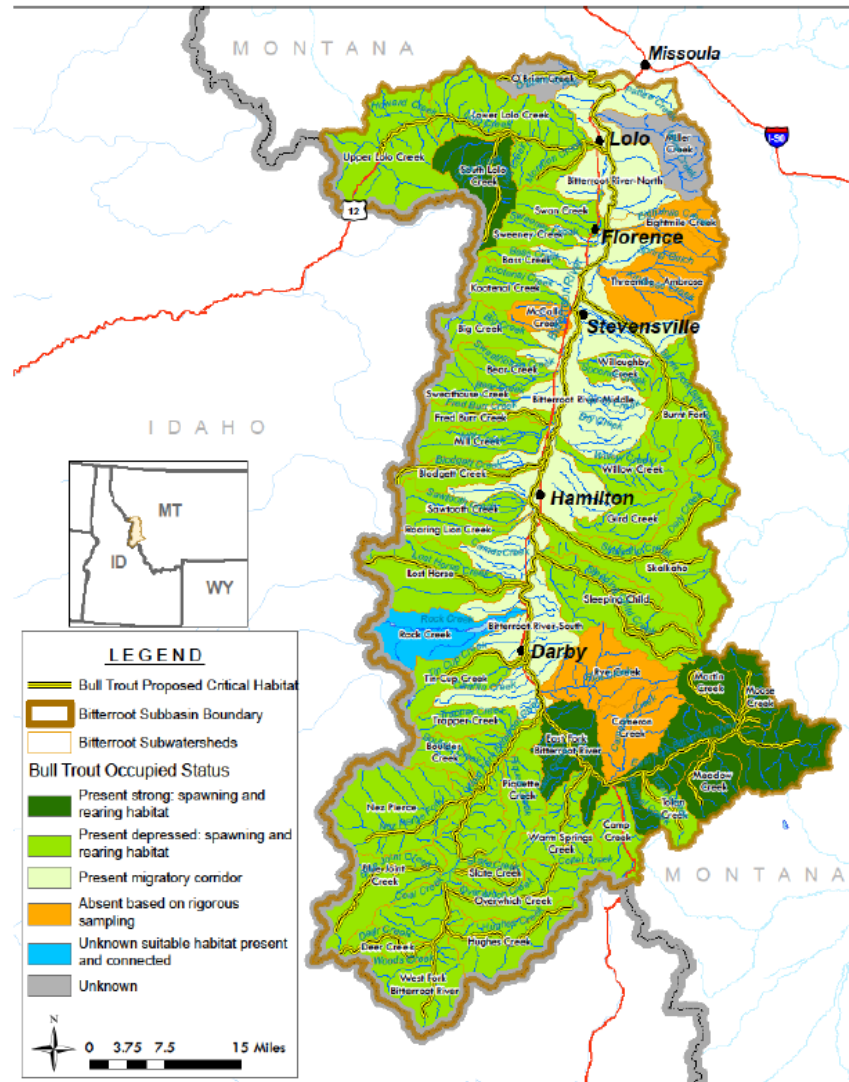


Figure 5: Bull trout habitat status by sub watershed.

Figure 4 Clark Fork Coalition bull trout habitat status by sub watershed

The Clark Fork Coalition created a plan to restore the Bitterroot Watershed (see exhibit 2). It designated many streams in the project area as priorities for restoration (see figure 5).

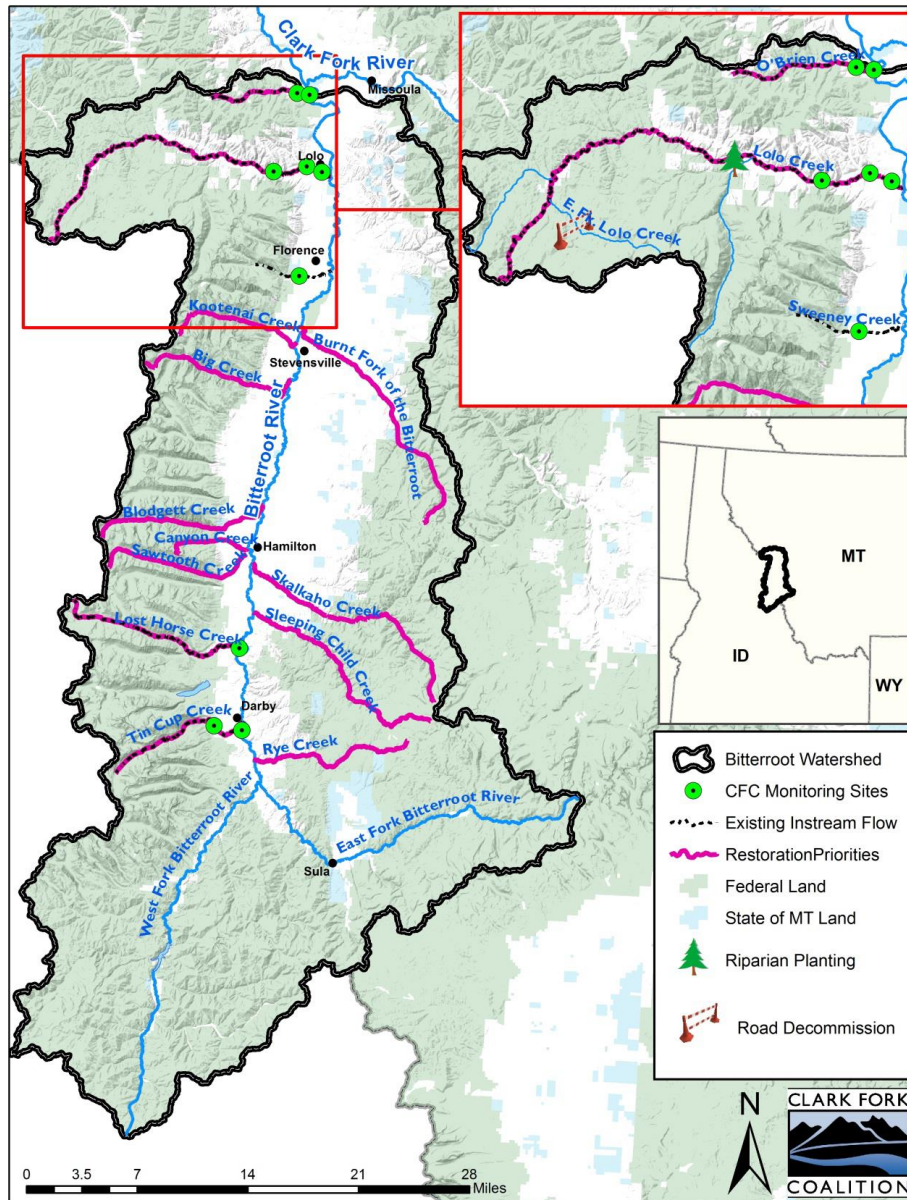


Figure 5 Restoration priorities on the BNF

How will project activities affect these streams that need restoration and contain bull trout and Westslope cutthroat trout? The Biological assessment for bull trout was not made available to the public.

Wolverine are proposed for listing and the BNF is a stronghold for the species. They are sensitive to roads and tracks by illegal off road use and legal winter use. More roads in remote maternal and primary habitat for wolverine will affect them as will more winter backcountry use due to ease of access created by new roads (see figure 6). How will project activities affect them?



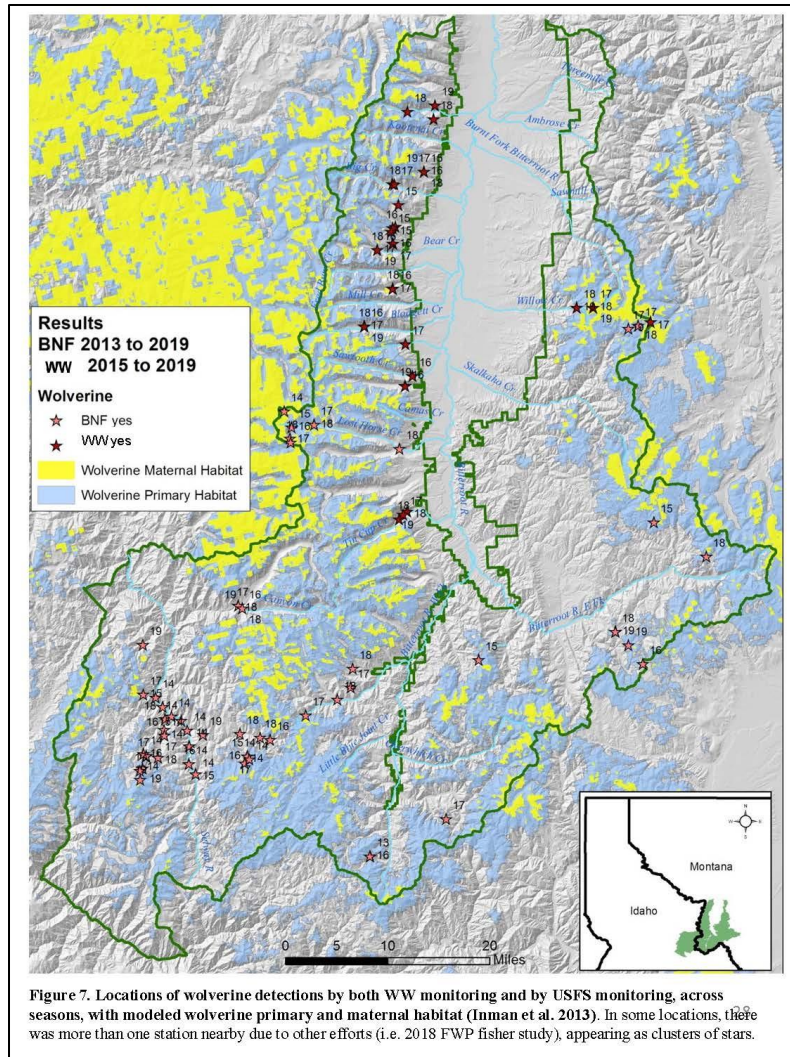


Figure 6: Wolverine verified sightings and wolverine habitat on the BNF

The Biological Assessment for wolverine has not been made available to the public in the EA or project files.

Grizzly bears are present in the project area and in the nearby Bitterroot Ecosystem (BE). The project area is essential to natural recovery in the BE. The recent modelling by Sells et al shows the best pathways between recovery areas to connect grizzly populations and ensure genetic vigor. The project area is key. How will re-blading overgrown roads affect grizzly bear recovery and denning habitat (see figure 7). The stars in figure 7 are recent verified grizzly sightings. Grizzlies are in and nearing the area.



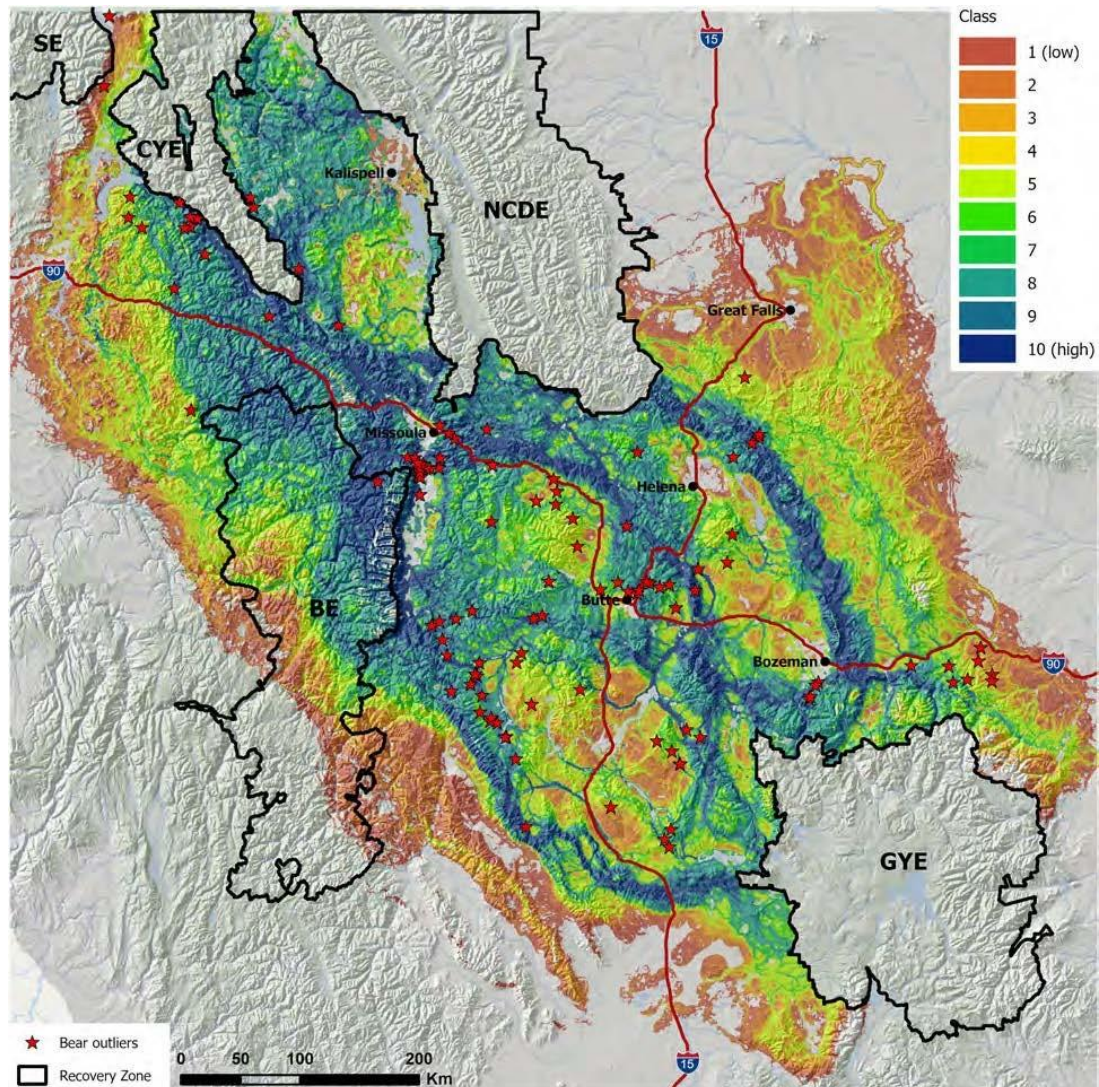


Figure 7- “Predicted connectivity pathways between grizzly bear ecosystems in Western Montana.” Sells et al., 2023. “Prediction of female grizzly bear connectivity pathways in western Montana, summarized from 5 sets of directed (randomized shortest path) movement simulations using start and end nodes associated with routes of NCDE-CYE, NCDE-BE, NCDE-GYE, CYE-BE, and GYE-BE (Fig. 1). Class 1 = lowest relative predicted use, whereas class 10 = highest relative predicted use. Simulations were based on 46 individual iSSFs for NCDE females. These simulations employed the lowest  $\theta$  value of 0.0001, which resulted in the highest correlation with independent grizzly bear outlier observations (Table 1). Results from other  $\theta$  values shown in the Appendix.” Id.

The BNF does not have a good track record of making way for natural recovery of grizzlies. The BNF does not have a forest-wide food storage order. It only has food storage mandates in the Anaconda Pintler Wilderness. Despite repeated black bear conflicts in Como Lake and Larry Creek Recreation areas. What are the cumulative effects on grizzly bear recovery and black bears from project activities, the lack of food storage orders, and opening overgrown roads?

Law et al 2022 states, “Our key message is that many of the **current and proposed forest management actions in the United States are not consistent with climate goals**, and that preserving 30 to 50% of lands for their carbon, biodiversity

and water is feasible, effective, and necessary for achieving them (emphasis added).” By the time you are finished with all the projects proposed and ongoing on the BNF, it will be too late for preserving carbon, biodiversity and water. It will be too late for wolverine, grizzlies, bull trout, and westslope cutthroat trout. Not having the personnel to monitor effects is not an excuse. Please cancel this project.

Thank you for considering my comments.

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