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Bitterroot National Forest

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<https://cara.ecosystem-management.org/Public/CommentInput?Project=55744>

#### Scoping Comments on Mud Creek Timber Sale

"Scoping Process and How to Comment: Comments specific to the proposed action that identify a cause-effect relationship are most helpful. Additionally, comments expressing concern about or interest in treating a specific location within the project area will help the interdisciplinary team design a proposed action that incorporates these comments to the extent possible. Comments expressing a general position or statement, while welcome, do not necessarily provide the interdisciplinary team with specific concepts or features that can be incorporated into the proposed action." (BNF Scoping letter)

The BNF is proposing a very large project using very general purpose and need statements and providing no specifics while asking the public to be specific. To paraphrase your statement, from the perspective of the public this does not necessarily provide the public with specific concepts or features that can be incorporated into the proposed project scoping comments.

Although I don't see any disclosure in the BNF scoping letter, I have heard statements from BNF staff that suggest a "conditions based" approach may be used, proposing specific treatments in identified units only after the Decision. That would be contrary to NEPA requirements. Also, how can we be specific if you are not? I suppose we could presume the whole panoply of possible actions in any given specific area and then comment on each. That is a waste of the public's time. The procedures involved with this project need to be disclosed during the scoping phase, so the public can also comment on effects of procedures used. Effects of unknown procedures are unknown.

"The Mud Creek project will have three main focal areas: 1) the departure from historic disturbance regimes and subsequent existing vegetation and fuel conditions, 2) conditions related to the current road network, and 3) a programmatic forest plan amendment related to elk habitat objectives." (BNF Scoping letter)

"The departure from the desired historic conditions within the assessment area is especially pronounced within Fire Regimes I & II where, based on Arno's research, the mean fire free period was 19 years (Table 2). Over the past 129 years, only approximately 4% of the acres that should have experienced multiple fires have even burned once. This departure from natural disturbance patterns has led to major changes in fuels and vegetation composition." (BNF scoping letter)

Historic conditions in the area have been highly variable. Prior to FS management the project area sustained a wider diversity of wildlife and vegetation mix, vastly more old growth, generally cleaner water, and a more resilient ecosystem. FS management has damaged the present condition of many forest facets. The effect of selecting any one arbitrary point in time 'causes' conclusions to be arbitrary. It is not surprising the chosen historic condition can be used to justify more logging.

Proposing logging to restore conditions damaged by supposedly widely effective fire suppression while continuing to carry on indiscriminate fire suppression seems like a perpetual budget funding scheme. The effect caused by this cognitive dissonance is loss of trust and continuing ill-conceived damage to the forest.

"Current open road densities range from 0.6 miles / sq. mile in the Little West Fork watershed (for the portion of watershed within the project area) to 4.9 miles / sq. mile in the Lower Blue Joint watershed." (BNF scoping letter)

Constraining discussion to open road density does not reflect the many impacts of closed, undetermined, temporary, tracked line machine and other road nomenclatures. A road is a road is a road, and a road by any other name has many of the same impacts, often permanent in practical terms. Disclosure of total road acreage compared to total area acreage at various scales from project area to cutting units could allow a rough estimate of various impacts to soil productivity, water quantity and timing and wildlife, among other facets of a healthy forest.

"Temporary roads would be constructed to a minimal standard to provide access for timber harvesting equipment and log trucks. These roads would be decommissioned following use for this project." (BNF scoping letter)

Road construction is an irreversible action because of the time it takes for a constructed road to revert to natural conditions. It is only the traffic that may be temporary. Results of monitoring the recovery of past decommissioning of temp roads should be disclosed.

"Undetermined roads identified as not needed will be decommissioned, either administratively or physically depending on the conditions of each road segment."

Administrative decommissioning does not seem to be effective at managing environmental damage, but simply managing terminology. Unneeded undetermined roads should be physically decommissioned. Results of monitoring the effects of past such administrative and physical decommissioning should be disclosed.

Interception of groundwater by roads is easy to see. The impacts to water quantity and timing caused by roads and soils compacted by logging need full analysis and disclosure. Also, the fact that sediment in streams impacts not only water quality but also water quantity and timing needs to be analyzed and disclosed. Sediment running down the creeks are permanent losses of groundwater storage capacity.

"We anticipate some even-aged regeneration harvest openings greater than 40 acres." (BNF scoping letter)

Information disclosing BNF recent regeneration failures after logging and fires and the factors contributing to such need to be disclosed. Also, the time required to regenerate should be discussed in the context of the timing of increasing challenge to regen caused by increasing climate change impacts. Projected regen benefits may be precluded by climate change.

"Terraced plantations: The Mud Creek project area contains 79 terraced plantations ranging in size from 1 acre to 130 acres and totally approximately 1,645 acres." (BNF scoping letter)

On a field trip to the area I heard a BNF soil scientist say he thinks some terraced plantations are within legal limits to detrimental soil damage. The former BNF soil scientist who headed Region-1 soil monitoring team consistently measured soil damage in terraced plantations at 90% or greater. The effect of this glaring discrepancy is to cause increased public distrust and potentially illegal contributions to further loss of forest productivity.

Monitoring: There needs to be more effort in monitoring impacts and outcomes to even be able to apply adaptive management. The public would appreciate summaries of Mud creek's recommended treatments having been applied to other specific areas on the BNF, and based on monitoring during and after these projects, how effective they were in achieving the desired outcomes.

Impacts to climate change from the proposed project need thorough analysis of best available science and disclosure within an EIS. Recent NEPA analysis of this issue within BNF NEPA docs has been woefully inadequate and antiquated. Given the existential nature of this issue and the impacts to all forest resources as well as human health and economies, this issue deserves much more attention and honest analysis. It is not legitimate or adequate to simply dismiss the impacts as being small relative to impacts of other human activities. This issue is the epitome of nature's reveal of cumulative small human impacts. It all adds up. In the well-known adage: A single straw eventually broke the camel's back. Logging burns the candle at both ends by adding CO<sub>2</sub> to the atmosphere at the same time as interrupting C sequestration.

Use of fear of fire and mischaracterization of fire effects usually make BNF analysis of the No-action alternatives look worse than logging regarding climate change and is factually misleading. Fire does not release anywhere near as much CO<sub>2</sub> as logging projects usually do. The effect of such misrepresentation is to increase mistrust in the FS analysis and intentions as well as increase the pace and scale of climate change as the pace and scale of logging increases.

Activities such as logging, thinning, and road building (even temporary roads), each of which is being proposed as part of this project, have been shown to increase not reduce the severity of subsequent wildfires. Failure to address current best available science causes a misrepresentation of the actual impacts of the proposed project which would lead to effects much different from what the BNF claims.

The fact, that during the past 129 years only ~4% of the Forest burned one or more times, was determined by climatic conditions which existed during that period. The claim that more of the Forest "should have burned one or more times" during that period is subjective and is used by the BNF to justify more logging. What that statistic suggests to me is that logging to supposedly protect homes has vanishingly small likelihood of being effective, in addition to the scientifically demonstrated lack of effectiveness of logging to reduce fire effects. What are the chances of fire reaching any given cutting unit during the life of supposed benefits from logging, generally estimated at about 10 to 15 years?

3) A programmatic forest plan amendment related to elk habitat objectives should be done separately prior to the Mud Creek project. The proposed Amendment needs its own scoping and analysis. Given that the Amendment would apply forest-wide and require cumulative impacts analysis of wide-spread use of project specific EHE amendments an EIS should be used. Doing the Amendment first would allow the results to be used for the timber sale. Why jeopardize the timber sale project by combining it with the separable Forest Plan amendment portion? The limits to road density provided by elk habitat objectives benefit other forest resources, acting as a surrogate for protection of water quality, soils and other wildlife species. Nullifying the elk habitat objectives would cause environmental impacts to facets of the forest other than elk which should be analyzed and disclosed. It does not

matter if that umbrella protection effect is intended by the Forest Plan or not, the environmental effects of removing protections will happen independently of intent.

Thank you for consideration of my comments.

Larry Campbell