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Comments: Jeff Lonn objection, Mud Creek Vegetation Project Responsible official: Matt Anderson, Forest Supervisor Bitterroot National Forest

August 22, 2021

I am filing the following objection on the Mud Creek project:

I have submitted three sets of comments on the Mud Creek project: 1) pre-scoping comments based on the October 12, 2018, public field trip; 2) scoping comments; 3) EA comments. The Mud Creek decision indicates that not a single one of my comments was ever seriously considered. In fact, Decision Appendix B, response to comments, suggests that all commenters' suggestions were dismissed (except possibly for a few industry comments advocating for more logging). The Appendix B responses merely

refer the commenter to the EA and/or the voluminous project files. Don't you think the commenters had already read these materials, and were basing their comments on them? What an incredible waste of time, both for the public and Forest Service personnel, whose salaries are being paid by the public. And the process is even more of a joke when conditions-based "analysis" is used because no real information is available.

I've been to enough Objection Resolution meetings to know that this next step is also a charade. Objectors will be asked to restate their objections, which have already been submitted in detail and represent hundreds of hours of work. The FS will have had ample time to review these, yet will not offer a single resolution. After a few hours of rehashing objections, time will be up. Again, what a waste of our time.

Under conditions-based analysis, interested parties will then be asked to volunteer more time, every year for 20 years, to get more information about implementation, with no recourse should they disagree. Why would the FS then change any of their plans, when they rarely did even under the traditional NEPA process? For example, On the Westside project, every single public comment[mdash]and these were pre-decision, not post-decision, comments submitted by 68 people[mdash]was ignored or disregarded, except one. (The one exception was to keep the old Camas trailhead spur road open for dispersed camping, which proved to be a bad idea because it has since been repeatedly used as a dump.)

Because nothing has been changed on the Mud Creek project since its inception, my objection is a repeat of my three previous comments submitted (all attached). Below are the highlights, with suggested remedies:

ISSUE: "Conditions-based Analysis", does not give enough information to allow the public to submit significant and meaningful comments. Site-specific details are not disclosed, yet once those details are disclosed over the next 20 years, the public will have no formal process by which to analyze the environmental effects as required by NEPA. Location and type of vegetative manipulation do matter, as do the amount and location of new road construction, for example. CBA's lack of analysis and disclosure are violations of NEPA and the ESA. With the scope, scale, and length of time required associated with

implementing a CBA program, there are significant risks of managing large landscapes using false assumptions and waiting for results until all projects are complete. In addition, CBA relies heavily on design features to mitigate impacts, and on past projects design features have not worked or have been disregarded.

REMEDY: Abandon the conditions-based analysis approach, and prepare a detailed EIS with specific locations of activities and those activities analyzed as required by NEPA. If you continue with the CBA process, then each sub-project needs to be analyzed and go through the NEPA process separately before implementation.

ISSUE: Old growth standards are changed to those of Green et al (1992), allowing more commercial logging and road building in Old Growth, in conflict with best available science Old Growth management recommendations (Yanishevsky, 1994; Hessburg et al., 2015; Fielder et al., 2007a,b; Wales et al., 2007; . Rapp, 2003).

REMEDY: Retain all trees 20 inches dbh or larger to keep all the trees that qualify as old growth by either Green et al or the Forest Plan standard, and provide replacement trees as the older, larger trees age and die. Do no commercial harvest or road building in old growth stands; only allow non-commercial activities (hand thinning, prescribed fire, etc).

ISSUE: The public was never notified of an official 60 day comment period for should for the proposed 22 regeneration cuts (clearcuts) from 40-200 acres as required.

REMEDY: Announce an official 60-day comment period. This comment period should not start until June 1st when the public can access the focal areas specified for large openings.

ISSUE: The proposed site-specific EHE amendment will negatively affect elk habitat and security. REMEDY: Abandon the site-specific EHE amendment. A forest-wide EHE amendment is already proposed that must go through a more rigorous NEPA process. Wait for the results of that.

ISSUE: New roads are proposed in this already heavily roaded area. They will have negative, but so-far unanalyzed, effects on wildlife, including the ESA-listed bull trout.

REMEDY: Build no new system roads; there are plenty of existing roads for timber harvest.

ISSUE (NEW INFORMATION ON WHITEBARK): Activities are proposed in whitebark pine, proposed to be listed under the ESA. The Whitebark Pine BA (new information) insufficiently analyzes the effects of these activities and does not include best available science on whitebark preservation and restoration. The BA does not ensure that whitebark will be protected, and whitebark has not even been completely inventoried in the Mud Creek project area. The BA provides no evidence that Whitebark daylighting or prescribed burning are effective tools in promoting Whitebark survival, and, in fact, they may be deleterious. How do you propose to "promote Whitebark in all stands where it occurs"? Robert Keane, noted expert on Whitebark Pine stated (2021) that pro-active silvicultural work is unnecessary, and "to

let wildfire do the work". He also added that mycorrhizal fungi are important to seedling survival.

Mycorrhizal fungi are often negatively impacted by silvicultural activities. Six et al. (2021) suggested "Where silvicultural practices are applied, they should be implemented with caution[hellip][hellip]Anthropogenic change is creating or enhancing a number of stressors on forests. To aid forests in adapting to these

stressors, we need to move beyond traditional spacing and age class prescriptions and take into account the genetic variability within and among populations and the impact our actions may have on adaptive potential and forest trajectories." Pfister et al. (1977) noted that Whitebark pine habitat types are very low in productivity, and recommended that they be left alone.

REMEDY: Do a thorough inventory of whitebark in the project area, and analyze in detail the effects of all activities, commercial and non-commercial, on whitebark. Use best-available science on whitebark to inform your decisions.

ISSUE: All available scientific literature, including the best available science, was not consulted or considered on this project. Instead, science was cherry-picked to support commercial logging, as is done on all BNF projects.

REMEDY: Consider all science provided by all commenters, and respond as to why you did not consider it during scoping, environmental analysis, or the decision. Justify why your science is better.

ISSUE (New information): Decision Appendix B, p. B-27, states: "The Bitterroot forest plan does not prohibit using ground-based equipment on steep slopes for non-yarding purposes." This is a misrepresentation of the 1987 Forest Plan, which was written before feller-bunchers were in widespread use and the only ground-based equipment in use was for yarding. It could not have been the intent of the Forest Plan to allow giant tracked equipment like feller-bunchers on steep slopes (>40%).

Feller-bunchers both cut and yard trees. Allowing them on steep slopes, even if they are only going to cut the trees and not bunch them, is a violation of the intent of the antiquated Forest Plan. It argues for a long-overdue new Forest Plan based on the public's 2021 values. FS violated the steep slope prohibition repeatedly on the Westside and DLL2 projects.

REMEDY: Keep all ground equipment off slopes >40% as intended by the Forest Plan.

REFERENCES (copies of each are provided in Friends of the Bitterroot Mud Creek Objection[hellip]..but why wouldn't you already have these?):

Fiedler, C. E., P. Friederici, M. Petruncio, C. Denton, and W. D. Hacker. 2007a. Managing for old growth in frequent-fire landscapes. *Ecology and Society* 12(2): 20. URL: <http://www.ecologyandsociety.org/vol12/iss2/art20/>

Fiedler, C. E., P. Friederici, and M. Petruncio. 2007b. Monitoring old growth in frequent-fire landscapes:

*Ecology and Society* 12(2): 22. URL: <http://www.ecologyandsociety.org/vol12/iss2/art22/> Hessburg, P.F., et al., 2015, Restoring fire-prone Inland Pacific landscapes: seven core principles:

*Landscape Ecology*, v. 30, p, 1805-1835. DOI 10.1007/s10980-015-0218-0

Keane, R., 2021, presentation on Whitebark Pine:

[https://umontana.zoom.us/rec/play/GSjFxF55I2nd7RAtlIbwT1w\\_zrlf\\_CaXtVhhGO5IU8OWdsnxRDHkZ4F7fAO28fsAYpjodGo1J1kIZhs.LA0spi-](https://umontana.zoom.us/rec/play/GSjFxF55I2nd7RAtlIbwT1w_zrlf_CaXtVhhGO5IU8OWdsnxRDHkZ4F7fAO28fsAYpjodGo1J1kIZhs.LA0spi-pDmnaEhiL?startTime=1615941602000&_x_zm_rtaid=VZKKDUo4ThaXnyEOBMHxVg.1629053355718.333293a732bf081d7294851f293d93be&_x_zm_rhtaid=50)

[pDmnaEhiL?startTime=1615941602000&\\_x\\_zm\\_rtaid=VZKKDUo4ThaXnyEOBMHxVg.1629053355718.333293a732bf081d7294851f293d93be&\\_x\\_zm\\_rhtaid=50](https://umontana.zoom.us/rec/play/GSjFxF55I2nd7RAtlIbwT1w_zrlf_CaXtVhhGO5IU8OWdsnxRDHkZ4F7fAO28fsAYpjodGo1J1kIZhs.LA0spi-pDmnaEhiL?startTime=1615941602000&_x_zm_rtaid=VZKKDUo4ThaXnyEOBMHxVg.1629053355718.333293a732bf081d7294851f293d93be&_x_zm_rhtaid=50)

Pfister, R.D., et al, 1977, Forest types of Montana: Gen. Tech. Rep. INT-GTR-34. Ogden, UT: U.S. Department of Agriculture, Forest Service, Intermountain Forest & Range Experiment Station. 174 p.

Rapp, V., 2003, New findings about old-growth forests: Pacific Northwest Research Station Science Update, 12 p. <https://www.fs.fed.us/pnw/pubs/science-update-4.pdf>

Wales, Barbara C., Lowell H. Suring, Miles A. Hemstrom, 2007. Modeling potential outcomes of fire and fuel management scenarios on the structure of forested habitats in northeast Oregon, USA. *Landscape and Urban Planning* 80 (2007) 223-236.

Six, D.L., et al, 2021, Growth, Chemistry, and Genetic Profiles of Whitebark Pine Forests Affected by Climate-Driven Mountain Pine Beetle Outbreak: *Frontiers in Forests and Global Change*, v. 4 , Article 671510.

Yanishevsky, Rosalind M., 1994. Old-Growth Overview: Fragmented Management of Fragmented Habitat.

Pp. 7-36 in *Rocky Mountain Challenge: Fulfilling a New Mission in the U.S. Forest Service*. Association of Forest Service Employees For Environmental Ethics, P.O. Box 11615, Eugene, Oregon 97440, February, 1994.