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Comments: The Bitterroot Front Project will impact 225 square miles of forest (144,000 acres). This landscape spans the Bitterroot Front from Florence to Darby - these locales are 44 miles apart by highway. For a project of this size, which will alter habitat, streamflow, water quality, an additional EIS is much more appropriate than a simple EA. Reliable, site-specific data is a must. Public input is needed. As with many projects these days, ground-truthing is crucial. Computer modeling is not adequate.

The project area includes Recommended Wilderness, a roadless Management Area, and Inventoried Roadless Areas. Consistent with your own recommendations for Recommended Wilderness, only hand thinning of forests in Recommended Wilderness should be allowed. No commercial logging should be allowed in Management Area 5. No old growth should be thinned. No definitions of old growth should be changed. No roads should be constructed in the project area, temporary or permanent. The USFS has been unable to maintain roads currently in place. Adding more roads will not only fragment landscapes, but add to an untenable USFS work load. Attached please find a letter to the USDA in response to President Biden's commitment to Old Growth forests as integral to serve as carbon sinks and sequester carbon. Commercial logging would undermine these goals along with adding to carbon emissions. Any project needs to be based on the best available science.

These areas (Recommended Wilderness, Inventoried Roadless Areas) provide critical habitat for wildlife. Such habitat also provides migration corridors from elk, wolverine, fishers, Canada Lynx and bears. Intact landscapes, along with old growth forests, are critical for their survival. Old growth forests sustain diverse species and downstream communities in the midst of climate change. This habitat, which in addition to old growth forests includes coarse woody debris, hiding cover, thermal cover and snags allows for resilience in response to heat stress and drought impacts. Riparian zones also need protection. The vague descriptions of the project area include critical habitat for bull trout and west slope cutthroat trout.

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