

Carol C. Johns

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Stevensville Ranger District

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Matthew D. Anderson, Forest Supervisor  
Bitterroot National Forest  
1801 N. First St.  
Hamilton, MT 59840

I am a resident of Ravalli County, Montana, and a stakeholder and interested party in the Bitterroot Front Project.

My comments are as follows:


- 1) **Opportunity Area 24, Como North:** I object to and oppose the application of Management Areas 1, 2, and 3a for the area west (uphill) of FS Road 5621 in the Como North Opportunity Area. Much of this area has already been logged and thinned repeatedly, and has recovered with a very high quality visual aspect. It is a riparian area that supports a broad degree of biodiversity, including an uncommon species, Calypso Orchids, which cannot tolerate disturbance. The topography is unique, with Lick Creek coursing through a rock chasm, over beautiful waterfalls. The area contains a mix of open, grassy parks and denser woodland, which provide for forage as well as shelter. It is an area whose natural beauty should be left undisturbed. Emphasis on timber and vegetative "management" and mineral development would be terribly destructive. This is an area which should be preserved.
- 2) **Opportunity Area 29, Trapper Bunkhouse:** For the same reasons as stated above, I object to and oppose the application of Management Areas 1, 2, and 3a, particularly along Trapper Creek.
- 3) **Understory removal.** I am very concerned about the proposal to remove understory "ladder" species of vegetation. Understory species and downed trees are valuable elements in the ecosystem. Much of the understory provides essential soil nutrients,

wildlife forage and shelter, as well as huckleberries, wildflowers, and other items valued by humans. The ecological balance of the Bitterroot Front could be irretrievably damaged by large scale destruction of the understory. The impact of this action would be significant. Further analysis and possible plan modification of this aspect of the project is required.

- 4) **Clearcutting.** I object to and oppose clearcutting.
- 5) **Compliance and monitoring.** I understand that much of the project work will be performed by project "partners", such as DNRC. The project proposal provides no indication of which party or parties will implement mechanisms for monitoring and enforcing compliance with environmental protection requirements and laws. The Forest Service must be ultimately responsible for protecting the Bitterroot National Forest. Environmental protection standards and requirements cannot be bypassed or avoided by delegations to partner entities. The environmental protection requirements and the responsibility for monitoring and enforcement must be explicitly set out in the project plan and in the project contracts. Litigation is best prevented by prevention of violations.

I reserve the right to submit additional comments after review of the environmental assessment. Please provide me with notice of all future proceedings of this project.

Thank you

  
Carol C. Johns