Data Submitted (UTC 11): 9/23/2019 6:00:00 AM First name: Michelle Last name: Long Organization: Bitterroot Audubon Society Title: Conservation/IBA Chair Comments: Bitterroot Audubon Society

Post Office Box 326

Hamilton, Montana 59840-0326

Bitterroot Audubon Society (BAS) would like the following comments, concerns, and questions to be entered into the public record for the Bitterroot National Forest's Mud Creek project.

1. The BAS supports the identified desired results following treatment, particularly:

\* Reduced conifer encroachment in meadow habitats to restore increase forage and nutritional value for big game species and important song bird breeding and rearing habitat.

\* Preserve and/or increase current old growth distribution across the landscape to provide habitat for important wildlife species such as Flammulated Owl, Lynx, Fisher, and Wolverine (7).

In the same section of the document, regarding Desired Conditions Following Treatment, the document says, "Treatments across the project area have well-documented beneficial effects to wildlife when combined with appropriate design features to minimize impacts to T&E or sensitive species"(7). We're interested in reviewing the analysis of effects (either positive or negative) on all T&E and sensitive species occurring in the project area. What are the design features that will minimize impacts to the flammulated owl and other important bird species?

2. While there will be no commercial timber harvest in the Inventoried Roadless Areas and no commercial or noncommercial timber harvest in the Blue Joint Wilderness Study Area, we would like to know what treatments will be used in those areas, which currently offer less disturbance to birds and other wildlife than most other areas in the Forest.

3. Goals for three of the five management areas specify "access for mineral exploration." Mining activities have serious impacts on the habitats relied on by birds and other wildlife. The BAS requests more information on plans for mining activities, for mitigation of negative effects, and for monitoring.

4. As the scoping document says, "The project area currently has one of the highest road densities found on the Bitterroot National Forest" (8). The document also says: As part of the Mud Creek project, a roads analysis will be completed. A roads analysis is required under the following conditions:

"When proposed road management activities would result in changes in access, such as changes in current use, traffic patterns, and road standards, or where there may be adverse effects on soil and water resources, ecological processes, or biological communities (road construction, reconstruction, and decommissioning), these decisions must be informed by roads analysis (FSM 7712.1) except as provided in section 7712.13c." (36 CFR Part 212, FSM 7712.13

As roads have significant impact on habitat, the BAS is concerned about possible "adverse effects" and looks forward to seeing the roads analysis and resulting decisions in regard to road management in the project area.

Thank you,

Michelle Long, Bitterroot Audubon Society Conservation/IBA chair, on behalf of the Bitterroot Audubon Board