

Data Submitted (UTC 11): 9/18/2019 6:00:00 AM

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16 September 2019

Matt Anderson, Forest Supervisor Bitterroot National Forest

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Re: Mud Creek Vegetation Project Scoping Matt:

Thank you for the opportunity to comment on this project's scoping level. I am extremely familiar with much of the project area, from many on the ground visits on behalf of the Bitterroot RAC on which I served for some six years in addition to many seasons' hunting trips into the Little West Fork eastward to the West Fork RS. Finally, I represented this area in the State Legislature, first as a House member, and my last two sessions as State Senator.

I do not object whatsoever to the stated objectives of this project; however these should be recognized as the outcome of the project's main purpose and need statement. Fundamentally, that should be to maintain a high level flow of water from these separate watersheds to feed the main West Fork Bitterroot River. Recognizing the relate absence of wildfire, and accumulation of woody fuels throughout the project area, the purpose of this project should be articulated to maintain its water delivery for downstream use (recreation, irrigation, and fisheries). That purpose is defined as your agency's fundamental purpose of existence in the Organic Act of 1897 and is exponentially better, and stronger for legally defensive than the project being based on subset issues.

In a more micro - management issues, the project area should be expanded to included the entire currently roaded area of Little West Fork drainage, as well as other drainages' with road systems that are only partially included.

Project planning as has been the norm now for several years has ham-strung field managers by establishing inflexible boundaries for vegetative management regimes. We both understand conditions change, and unfortunately, can radically change sometimes. A developed EIS without adequate tolerance for adjustment is detrimental for the general goals of the Forest. Consistently, the majority of "newer, better and innovative" harvest techniques in past projects have been developed and proposed by Timber Purchasers, not agency Contracting Administrators. To promote this innovation, I urge the technique that establishes and determines the preferred end result of a harvest area, and allow the Purchaser the flexibility to propose alternative harvest and mechanical systems. This is in effect, "Prescription by Description", which now through the second Farm Bill, is a recognized tool in your tool box.

Another critical issue that has developed over the past few years is to do "Landscape Analyses" for EIS efforts. I support this approach; however, often it is only to establish a defensive legal posture that the actual harvest blocks that typically equate to under 20% of the analysis area, and are then "de minimus" impact upon the gross study area. This may be a rational approach, yet it leaves the remainder of the study area virtually inviolate for any other issue that arises. If this approach persists, I must urge you that whatever the initial project study areas encompass must then be recognized as the actual Vegetative management project boundary, or boundaries if multiple projects are envisioned.

Finally, and on a much more personal level, up the bottom of Soda Spring Creek, only a short distance above the bridge crossing on the main trail is an incredible grove of ancient, old growth Ponderosa Pine, that while several exceeding 3 ft dbh, they are neither "flattopped" or show signs of reduce vigor. This stand is at EXTREME fire risk due to encroaching limby Douglas Fir that are producing a fuels ladder into the crowns of these veteran trees. The RAC many years ago visited this very site to consider the management conundrum this area presents. These are some out-of-the-box techniques to thin the understory, and ground skid within the streamcourse: one is using a Snow Groomer as a skidder only over 3+ feet of snow. (This technique was successfully executed on the Gird Point Fire Salvage project over a quarter century ago.) There could be others, as well.

Thank you for your consideration

Patrick O. Connell, Certified Forester