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Comments: Scoping Comments for Mud Creek Project, West Fork Ranger District, Bitterroot National Forest

1-Issue: Nontransparent and confusing [NEPA] process for this project. No disclosure of specific actions or treatments until after decision is made does not instill public trust nor does it seem fair or legal. This brings failure to collaborate with the public to a new level.

Design criteria: Use normal NEPA process that's transparent and facilitates public trust; where locations of harvest units, planned road construction, etc will allow more informed feedback from the public, forest collaboratives, etc.

2-Issue: Two of the 3 Purpose and Needs (regarding promoting forest resiliency and sustainable transportation system) are generally worthy objectives; the controversy arises as to the specific methods in achieving these goals. Namely, where on the active to passive management spectrum the "treatment" emphasis is placed, and if a reasoned cost-benefit analysis is performed based on the chosen forest treatments.

The third stated P and N (elk objectives Forest Plan amendment) relates to a chronic issue for many years on nearly every logging project.

Recommendation: Amending the FP for elk objectives is a significant issue that deserves its own NEPA process with an EIS.

3-Issue: Very high project area (PA) road densities causing sediment runoff, weed proliferation, habitat fragmentation, added maintenance costs and contributing to an unsustainable and ecologically damaging road transportation system.

Design criteria: First, do the obvious: Do not dig the proverbial hole deeper in exacerbating the above impacts by constructing more roads, whether temp or spec. Do not reopen/reconstruct undetermined roads. Decommission a slew of roads. Of those not decommissioned perform BMPs and resolve sediment issues, fish passage barriers, undersized or degraded culverts, etc. Road construction is expensive. Decommissioning temp roads is expensive. New roads add to maintenance backlogs and potentially create more sediment and habitat fragmentation.

As the comments from the public and the collaboratives showed more road construction is not wanted unless under dire circumstances such as a critical road that needs relocation due to ongoing resource damage.

A project without new road construction will garner more public support including from the collaboratives. Surely a PA with one of the highest road densities on the Bitterroot is suitable for a project that can be designed to achieve its P and N without new construction or opening ghost roads.

4-Issue: The predetermined plan to do an EA for this project is presumptuous and insufficient given its size, presence of bull trout, other ESA issues (e.g. lynx habitat), history of severe soil disturbance (like terracing and extreme road densities).

Design criteria: EIS is warranted.

5-Issue: Old Growth (OG) Logging OG or road building in OG is ecologically damaging to species uncommon on our forest and to a rare habitat itself. It is also highly unpopular as noted with Gold Butterfly. It impacts fisher, marten, goshawks, flammulated owls. It degrades OG structure and composition. OG logging and road building (Issue #3) are the most controversial and harmful management practices that for some reason the BNF is choosing to do in a recently accelerated fashion to the detriment of our forest and its wildlife. It's also causing public mistrust, animas, and is fervently opposed in comments from the public and the collaboratives.

Design criteria: Design a project that logs no individual OG trees. If entering OG stands limit actions to understory non commercial thinning and/or prescribed burning. Fully map OG in the PA with field verification. Promote more OG by limiting size diameters on tree harvesting to <16". Large,old trees provide the structural backbone to our forests and both Prof. Larson and the Hessburg restoration principles stress retaining large,old trees.

Again, by NOT logging any individual OG trees the FS will have created a project that the public is much more apt to support.

6-Issue: Recreation: Some roads in the PA may provide opportunities for quiet use recreation like mountain biking provided they have limited impacts to resources and wildlife. Design criteria may include seasonal closures for sensitive wildlife.

7-Issue and Recommendations: WSA and IRAs

Inclusion of a portion of the a Blue Joint WSA in the Mud Project is unnecessary at this time. The WSA should be managed as Wilderness including no significant active management treatments such as prescribed burning. A Wilderness inventory or assessment may be useful information for future forest planning. Travel restrictions should remain and follow the current Travel Plan.

IRAs: Recommend no treatment except hand thinning along Community Protection Zone (if applicable); also prescribed burning.

8-Issue: Impaired streams in PA; presence of bull trout.

Recommendation: Design project such that no significant short- or long-term increase in sediment is created. Analyze this project under an EIS.

Design criteria: Avoid new road building; apply BMPs; winter logging only. Avoid any commercial logging in riparian habitat conservation areas. I support dropping some trees into streams to improve fish habitat.

9-Issue: Climate change

In the first 20 years post project would Mud be a net emitter or sequester of carbon?

Or, how many years would be required for Mud to be a net sequester of carbon?

A recent study in Oregon showed that the timber industry was the state's biggest carbon polluter. Recommendations were made to limit diameter sizes of timber harvest.

The FS cannot in good conscience keep insisting that every single logging project has no impact on global warming. Cumulatively it does. Management practices need to change. We should be planting millions of trees on the BNF and harvesting only 1000s of small diameter, commercial ones. Large trees (>14") whether dead, dying or alive, should be left on the landscape.

10-Issue and Recommendations: Wildlife: In the scoping document there is considerable emphasis on improving big game habitat and forage, but little about improving non-game habitat. Similarly in regards to sensitive, threatened and endangered species, the goal is simply to "minimize impacts" to them. I recommend creating design criteria that maintain or improve habitat for non-game species and certainly for sensitive and T and E species.

There should be extensive field surveys to locate sites for flammulated owls, goshawks, and other unique habitats like western toad breeding areas.

Connective corridors and habitat linkages should be maintained or improved, such as by decommissioning roads.

Lynx habitat should be mapped and disclosed to the public.

Avoid further habitat fragmentation by not building new temp or permanent roads or reconstructing old,undetermined roads.

Veg treatments at Painted Rocks Lake could be performed to improve big horn sheep habitat.

Enough roads should be decommissioned such that Lyon's intended criteria for EHE would pass muster in the PA. In other words utilize a metric and extrapolate it such that road densities per 3000 acre "areas" in the Mud PA would align with Lyon's data.

11-Issue: Monitoring: There needs to be more effort in monitoring impacts and outcomes to even be able to apply adaptive management. The public would appreciate summaries of Mud creek's recommended treatments having been applied to other specific areas on the BNF,and based on monitoring during and after these projects, how effective they were in achieving the desired outcomes.

Allocate adequate and specific amounts of monitoring money to Mud. Disclose the amount.

Utilize test plots with particular design features to test different management approaches and their effectiveness.

12-Issue: Logging/Fuels reduction.

If the priority is hazardous fuels reduction and community protection, then restrict commercial logging and thinning to the CPZ,or within 1/4 mile of the private land boundary. Restrict other thinning to what's accessible from the existing road system.

Develop an alternative that constructs no new roads, logs no OG, and utilizes existing road network.

Apply Professor Andrew Larson's "ICO" approach to restoration forestry to promote landscape heterogeneity. Apply Hessburg's 7 principles of restoration (Hessburg, P.F., et al, 2015, Restoring Fire-prone Inland Pacific landscapes: seven core principles: Landscape Ecology, v. 30, p 1805-1835). The Bitterroot Restoration Committee for instance has recommended to the BNF on multiple occasions to utilize the ICO/Hessburg approach. Will the BNF commit to applying these? If so, more support for the Mud project will occur.

A new wave of desire to do wholesale Doug fir logging (especially clearcutting) has come to the BNF based on "improving forest health" to deal with endemic dwarf mistletoe. I do not support logging mistletoe-"infected" trees as anyone who walks the woods will see the many wildlife benefits of mistletoe for shelter, nesting, and food source. As your own FS pamphlet on mistletoe states, there are many benefits and no real ecological threat; but if the greatest priority is industrial timber harvest then that may justify it. But please don't cloak it as forest health;

simply say you want saw logs at the expense of forest and wildlife health.

Insects and disease are natural forest thinners that nature has been doing for time immemorial. Humans can never manage our forests as well as nature can. It's too complicated, too many unforeseen consequences, too much political and corporate bias. Humans-even expert silviculturists-cannot choose the "best" trees to leave. Healthy looking trees may not be the most resistant to disease, insects, or drought.

Limit your attempts to "manage forests like nature would" to strips of land abutting private, with possible test plots elsewhere to test your theories and limit the harm.

And given that global warming will be the overriding factor on our forests for the foreseeable future, don't presume the FS can predict the future, choose winners and losers, and "forest-manage" our way out of climate change.

13-Issue: More effective collaboration

Collaboration requires transparency, honesty, and a 2-way, reciprocating street between parties to be effective. The "condition based analysis" proposed in Mud-where specific treatments to specific locations will be provided only AFTER the decision-is not transparent. This is an awful start to collaboration on Mud. It feeds perceptions of a paucity of agency openness and integrity. It's not going over well with the public at large or with the local forest collaboratives. But you still have time to redeem and change course.

The FS apparently felt collaboration on Gold Butterfly was a "failure." But the public gave voluminous input at all stages on Gold Butterfly and the common concerns (OG, road construction, impacts on the county road and residents) repeated themselves at every stage: scoping, alternative workshop, DEIS, both collaboratives at many meetings-all over a matter of YEARS! Yet while the FS "listened" to the public's concerns (and even developed Alternative 3 -as required by HFRA, EIS), the BNF never got down to brass tacks and did a substantive back and forth to resolve these issues prior to the objection meeting. The public was willing to compromise as evidenced by overwhelming support for the still-large commercial timber operation under Alternative 3 (or even modified Alt 3, supported by Friends of the Bitterroot no less) but clearly Alt 3 fell on deaf ears when decision making came to fore. The public wanted to collaborate on Gold Butterfly. The FS: Not really. Maybe a collaborative box checked. Maybe not?

But I still hold out some hope: I believe if the BNF develops a project that constructs/reconstructs no new roads, decommissions roads aplenty, logs no individual OG trees, and prioritizes thinning in the CPZ, then you'll get a project the public can get behind. This will take the FS truly collaborating with the public through substantive giving and taking, not just "listening" or ever-so-mild tweaks to a few cutting units.

But clearly, starting off with an opaque new analysis scheme that lacks veracity is not a good start.

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