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Title:

Comments: Bitterroot Restoration Committee Scoping Comments on Mud Creek Project Purpose and Need:

The BRC generally agrees with P and N related to improving landscape resilience and designing and implementing a suitable transportation and trail system. However specific actions and/or treatments to achieve these 2 objectives will depend on site-specific conditions and analysis. Without an understanding of specific project design, we can only comment in a generalized way. Our comments and related discussion are listed below.

"Condition Based Analysis":

Our Committee finds this new process confusing and unclear. We are uncertain how you will be able to conduct an effects analysis or determine outputs without identifying actual treatments on the ground. Without disclosing the specific locations and the proposed treatments, our Committee can only speak in generalities. The location and type of vegetative manipulation and the amount and location of new road construction are important. We find that a lack of site specific project design and analysis will become problematic as we move forward with this project.

Need for an EIS:

We recommend an EIS and not an EA as predetermined by the Forest. An EIS seems more appropriate given ESA issues (bull trout and lynx), the size of the project, the level of soil disturbance (example: terraces), the extremely high road densities, and the proposed programmatic FP amendment related to elk habitat objectives. Programmatic Elk Habitat FP Amendment:

Our Committee has concern regarding the need to incorporate a Forest Plan Elk Habitat Amendment into this project. We are concerned not only with the feasibility of including this added complication into the project, but are concerned that such an action could be a basis for unnecessary procedural and legal challenges and delay the project implementation.

You identify the need for this FP amendment to refine/improve/update elk objectives, but maybe a stand-alone amendment with its own analysis would be more appropriate. Why is it tied to this project?

While there is mention of more "recent scientific literature" to justify the amendment, no citations are given.

Additionally, no ideas or metrics are enumerated in the scoping document as possible remedies.

We recently contacted your wildlife biologist, Justin Martens. He has been very helpful in providing citations and helping us better understand the issue and your concern for the need of a Forest Plan Amendment. A portion of his response to us includes: "There are numerous other studies and the Forest is working closely with Montana Fish, Wildlife, and Parks as the experts on elk, to analyze more current research regarding habitat use, elk movement, and other factors that influence elk distribution across the landscape to help us use the best science in formulating potential elk habitat objectives and standards."

We commend the Forest for trying to resolve this issue, but it seems to be a major undertaking in its own right. With the size and complexity of the Mudd Creek Project, we recommend that you address the elk habitat issue in your upcoming Forest Plan Revision. In our view, this proposed Forest Plan Amendment is a critical issue, worthy of a stand-alone EIS.

WSA/IRA:

Part of the Blue Joint WSA is included in the project area, but no mention of possible actions. At a BRC meeting (9/23/19) there was mention of possible prescribed burning by the FS. The Committee recommends managing the WSA as Wilderness, including travel recommendations as in the current Travel Plan.

It may be beneficial to do an updated Wilderness assessment to measure its wilderness characteristics and quality and to incorporate the Blue Joint WSA into your Project Analysis Area. Including this unroaded area into your analysis would greatly improve your ability to evaluate the Mudd Creek Project's relationship to not only Wilderness potential, but also important issues such as threat of wildfire, wildlife habitat connectivity, wildlife habitat security, water quality and motorized and non-motorized recreation. Although we are not suggesting that

you complicate this project by including a recommendation on Wilderness designation, information used in your analysis could be helpful when you do address the WSA issue in your Forest Plan Revision.

#### Roads:

Desired condition in the project area (PA) would include a significant reduction in road densities for a sustainable, affordable transportation system that also reduces the area's road impacts on wildlife and water quality/fisheries. BMPs should be performed to all roads in the PA that are not planned for decommissioning or conversion to recreational trails. Consider converting some hydrologically stable roads to recreational trails, provided resource or wildlife concerns are low. Given the PA has one of the highest road densities on the BNF, consider a project that keeps any new road construction or reopening of undetermined roads at an absolute minimum. Since roads and road impacts have been a contentious issue with our Committee over the years, this would significantly improve our support for the project.

#### Old Growth:

Old growth habitat and the retention of large old legacy trees are important wildlife habitat components and are difficult, if not impossible, to replace following timber harvest. It is for this reason that our Committee places such an emphasis on the retention and/or treatment in old growth stands. The Forest should not only be concerned with meeting or exceeding Forest Plan objectives for old growth habitat, but should also plan for treating specific stands with the purpose of recruiting future old growth habitat.

Some specific desired condition for OG in the PA include:

- ? Retention of OG trees such that there is no net percentage loss in third order drainages;
- ? Completing full OG surveys that are mapped and field verified;
- ? Limiting treatment in OG to understory thinning or prescribed burning wherever possible;
- and
- ? Limiting harvesting of trees over 16" in diameter.

We would also like you to consider an alternative that logs no OG and constructs no new roads.

#### Recreation:

Roads and trails should be adequately maintained in the PA to allow for recreational opportunities and access. As previously stated, certain roads in the PA may be suitable for road-to-trail conversion for recreational opportunities. Travel in the WSA in the PA should remain non-motorized, non-mechanized.

#### ICO/Hessburg

The Committee recommends treatments and actions that align with Professor Larson's ICO approach to ecological restoration, along with following Hessburg's principles for forest restoration.

#### Wildlife:

Your proposal to apply "Condition Based Analysis" is perhaps the most problematic when it comes to achieving wildlife habitat objectives on the Mud Creek Project. We would like to know more about how this analysis will be used in decision making. Wildlife species and populations are dependent on the location, amount, distribution, and juxtaposition of habitat types, seral stages and age classes in order to meet their life requirements. A spatial analysis of these conditions over time is essential in evaluating the impacts of management on wildlife and their habitat. In fact, these variables are the foundation of the Wildlife Habitat Relationships (WHR) program that has been the basis for wildlife habitat assessments in the Forest Service for decades. Our Committee would like to understand how the "Condition Based Analysis" will address the spatial and timing issues regarding wildlife habitat.

Some of our specific concerns and/or recommendations include:

- ? The need for field surveys to identify sensitive, T and E species;
- ? The identification of nest sites/territories of sensitive bird species like flammulated owls and goshawks; and
- ? The establishment of appropriate buffers with retention of associated trees.

Habitat linkages and connective biological corridors should be maintained and/or improved.

The Committee is supportive of treatments to improve bighorn sheep habitat at Painted Rocks Lake. While there is considerable effort discussed in the scoping document to improve big game habitat, there is little mention of doing the same for non-game species. We recommend that the project not only improve habitat for big game, but

also for non-game species including but not limited to flammulated owls, wolverine and fisher.

We recommend avoiding further habitat fragmentation or significant disturbance, notably related to road construction, especially in sensitive habitats. We also support making a significant reduction in the area's road densities to improve elk and other wildlife habitat.

#### Water/Fisheries:

Are there any impaired streams in the PA? Why are they impaired and how will they be addressed? Are there any sediment-causing roads slated for decommissioning?

We support a no net sediment increase in the short- or long-term for any bull trout streams in the PA.

#### Climate Change:

How will the project contribute to, or mitigate, global warming? Will the project, as a whole, be releasing or sequestering carbon?

Our Committee recommends the FS pursue the best available methods (based on recent research) for considering the influences this project has on global warming.

#### Wildfire/Fuels Reduction/Thinning:

Where are the prescribed fire opportunities in the PA? How many will require thinning beforehand? How much of the area in the project's WUI component will allow for future prescribed fire after the project's completion?

Emphasis on fuels reduction, prescribed burning, and thinning should take place in the WUI, prioritizing the initial 1/4 mile or Community Protection Zone (CPZ).

Site-specific analysis in low elevation forest should be evaluated in the context of aspect, topography, microclimate, and existing species composition. This will help ensure that while favoring Ponderosa Pine, large, old, Douglas fir trees are retained.

Except where it may adversely impact wintering wildlife, emphasize commercial timber harvest in winter to minimize ground disturbance and invasive weed introduction.