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Organization:

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Comments: Please enter the following into the public record for the Mud Creek project, West Fork Ranger District, Bitterroot National Forest.

1. I am very concerned about the new, condition-based analysis being used for this project. Given the Forest Supervisor's reactions to objections submitted for the Gold Butterfly project, it's tempting to see this new process as a way to avoid detailed comments, comments that would arise from a scoping letter that reveals planned treatments on specific units in the project area. Similarly, the choice to use an EA instead of an EIS minimizes specifics on treatment. In the injunction granted recently that halts a part of a Tongass project, the Court said, "An EIS must be specific enough to ensure informed decision-making and meaningful public participation" (Southeast Alaska Conservation Council v. United States Forest Service). As an EA is less specific than an EIS, the Court's requirement for specificity could be demanded by a court reviewing this project, should litigation occur. Aside from the legal issue, the FS should consider the impact of this condition-based analysis on the relationship between the FS and other stakeholders, including the public at large, collaboratives, and other interested groups. If the FS truly wants to work with these stakeholders, it should give them the information necessary for meaningful comments. I understand that the FS is working a process that would offer opportunities for participation throughout the project, but this process has not been determined before comments are due 10/7/2019, and so commenters cannot assess those opportunities. For example, we do not know what sort of participation will be allowed after treatments on specific units are identified, and we do not know if feedback will be on the public record. I also have not been convinced that the NEPA process used in the past, for example on Gold Butterfly, is deficient and needs to be replaced by condition-based analysis. Please revert to that NEPA process.

2. Most would agree with the first two stated Purpose and Need objectives, but there is much disagreement about how to achieve improved forest resiliency and a sustainable transportation system. In large part, that disagreement arises from very different evaluation of the science regarding forest management. The FS should be using recent peer-reviewed studies in developing its plans. As other commenters have pointed out, recent science challenges the FS's plans on many fronts, including mistletoe, roads, Old Growth, Doug Fir, insects and disease, and the efficacy of various treatments on wildfire, to name a few. The last mentioned, the efficacy of treatment on wildfire, is particularly important, as in every proposed project, the FS uses the threat of "catastrophic fire" to justify logging. Dozens of studies call current practices into question and should be considered more thoroughly by the FS. Please see the comments and citations of Jeff Lonn, Mike Hoyt, and Van Keele, my colleagues on the Bitterroot Restoration Committee. I would like to see a task force, which includes the FS, members of collaboratives, and other interested parties, study recent science together. Perhaps then there could be a shared set of facts, more shared understanding, and less conflict over scientific findings that should guide the FS.

3. As the scoping letter points out, "The project area currently has one of the highest road densities found on the Bitterroot National Forest." Given the problems caused by roads, including fragmentation of habitat, increased stream sedimentation, degraded water quality, the spread of weeds, and the high cost of road building and maintenance costs, the FS should not build new roads, including temporary roads, and should not reconstruct undetermined roads. Judging by public reaction to the Gold Butterfly project, the public does not support new roads. Tailor management activities to use only existing roads.

4. The Blue Joint WSA and the IRA currently in the project area provide inestimable value to wildlife. They are far

more pristine than the rest of the project area. Please leave those areas alone or do only hand thinning. In the past few years, the people of Ravalli County and Montana as a whole fought hard to protect the WSAs. Leave the Blue Joint alone and use it as a control to see how untreated areas compare to areas treated in various ways. And given the high density of roads in the project area, the IRAs could also be used as a control to further assess the impact of roads.

5. Given the importance of large, old trees, according to Hessburg, Larson, and others, first do a thorough field inventory of old growth trees in the project area. Then, do not commercially log any OG trees or add roads in OG stands. The damage logging and roads do in younger forests is magnified in OG stands, which are habitats important to many species and a valuable habitat themselves. Only do understory non-commercial thinning and/or prescribed burns.

6. In a project of this size, the impact on wildlife can be devastating. Surveys should be conducted to identify habitat for flammulated owls, goshawks, lynx, and other important species. Impact can be minimized by the development of an alternative that preserves OG, constructs no new roads, eliminates treatments in the WSA and IRAs, and uses recent science to guide treatment. Such an alternative should include maintaining or improving habitat for non-game species, especially sensitive and threatened or endangered species. The proposal in the scoping letter focuses primarily on game species.

7. Field trips to fairly recent projects show that monitoring is quite deficient. Even the best plans are meaningless unless monitoring is included. The problem is often that monitoring activities are not funded adequately if at all. Secure funding for monitoring during and after the project implementation.