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Title:

Comments: Thank you for the opportunity to comment.

- 1. To be frank, I think the BNF needs to quickly ramp down your timber target, not try to attain the present unachievable harvest quota dreamed up by politicians who probably know little about forests. Many specialists in the FS have agreed the quota has been set far too high, yet the USFS seems hell bent to push on with trying to feed the insatiable beasts, regardless of the innumerable disastrous social and ecological consequences, not to mention the incredible cost to taxpayers.
- 2. This project needs to have an EIS completed instead of just an EA for, several reasons including its large size, variety of terrain, social consequences, and effects to listed species.
- 3. The new BNF format to comment on projects makes it a full time job to stay abreast of and comment on this (Mud Cr.) and the next two huge proposed projects: Piquett Cr. and Bitterroot Face/ Front. Maybe that is your intention? Please return to the old comment/planning protocol.
- 4. The public needs maps showing roads, drainages, unit boundaries with a key of what is proposed for the various units early in the comment process.
- 5. The "wildland/urban interface" that you mapped out is absurdly wide. This seems like an attempt to spread fear so adjacent landowners will consider supporting whatever logging ideas you come up with. There is nothing urban about the West Fork of the Bitterroot, or any part of your project area. Fire science does not support logging that far away from structures. In this case of Mud Cr. the phrase/anacronym "WUI" falls into the same category of propaganda speak as your medical terminology used to talk about virtually all logging projects. I wish you would use the language in a more honest way.
- 6. Well after the last comment maybe you have stopped reading. But if you have not I ask that you change the boundary of the project keeping roadless areas, inventoried roadless areas and wilderness study areas outside of your black-dotted-line project boundary. Roadless areas and WSAs need to be left alone for innumerable reasons. Your inclusion of some of these areas sends up big red flags to the public regardless of your intentions.
- 7. Seems like the trend is to give the public more colorful computer models yet with employee turnover it seems less and less likely that people in the decision positions know the project area well. Foot travel is required to know an area.
- 8. As you mentioned in your scoping document, road densities are very high. There is roughly 242 miles of roads showing on your scoping map within the project area. There may be twice that many or more once (or if) all the old grown-in roads are rediscovered. Some sections may have up to twenty miles of road, not including terraces.
- 9. No new ATV, motorized, or bike trails. These are not compatible with elk, mule deer, bighorn sheep, blue and spruce grouse etc. There's plenty of places to ride.
- 10. Reduce open road densities, not just for elk and other species mentioned above, but for over 100 other "popular" animal species, as well as snag retention.
- 11. Apparently logging has been found to emit more CO2 than forest fires. The project needs to address climate change and CO2 emissions. Another reason why an EIS is needed. I would like to see the project not focused on tree cutting. Reduce the number and size of trees to be cut. And do not cut any ponderosa, Douglas fir, subalpine fir, or spruce, over 12" dbh. Would like to see no lodgepole cut over 6" at lower elevations, and no trees cut at higher elevations.
- 12. Roaded portion of project has high percentage of compacted soils. The project area needs less compaction, not more, and much more will occur if this sale is anything like the past sales.
- 13. Please, no new mineral exploration in the project area. There is already too much disturbance to these lands.
- 14. I oppose any new road construction or opening up of any roads that are already recovering/ growing back in.
- 15. Regarding the terraced areas, I suggest you let nature take its course and continue its healing of the FS created terraces. Please do not disturb these areas further, and do no cutting or management of any kind on them.

- 16. Please, no more clearcutting, any tree species, anytime .
- 17. I oppose commercial thinning of any old-growth stands, near old-growth stands, pockets or groves of old-growth or near old-growth; regardless of tree species, level of insects, fungal decay, mistletoe, or other perceived threat to the "health" of the stand.
- 18. I oppose any entry/active management in IRAs, WSA, and formerly unlogged or unroaded acres.
- 19. I support the checking and replacing of culverts where needed under the roads that remain open, and the removal of culverts and stream slope rehab on the riparian sections of road to be closed.
- 20. I support the true reduction in miles of road in the project area.
- 21. I oppose "aspen release" except as it occurs from wildfire. Stream buffers should be upheld, no "aspen release" creek buffer exceptions as happened in Lost Horse.
- 22. Current logging practices on the BNF are creating massive weed spread, soil compaction, reduction in fungi diversity, and increased time windows and acreage for fire ignition sites.
- 23. Some parts of this project area have spectacular stands of old-growth remaining. Some old-growth ponderosa stands are near Painted Rocks Resevoir and the West Fork. As your records should indicate at least two bald eagle territories and several of their nest sites/alternative nest sites are in the project area. Interestingly cavity nesting waterfowl also nest in these big pines up to over 1/4 mile away from the resevoir and river. Also osprey are annually nesting in the project area. Though ospreys are now common in the Bitterroot Valley and their nests are easily seen on refuges and private lands, there nest sites are rare on BNF lands. Care must be taken to not damage or destroy their nest trees and vicinity. BNF track record on this district regarding these nests is not good.
- 24. Native American ancient sites are documented in the project area and others surely exist. A thorough new survey should be completed by archeologists. If they have not been already, appropriate tribes should be contacted and kept in the loop regarding your evolving plans to further road and log this area.
- 25. More sale administrator monitoring hours are needed on active project sites.

Thank you for your attention. Mac Donofrio