Data Submitted (UTC 11): 3/24/2021 11:00:00 AM
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Title:
Comments: Background: Though I much prefer to be an ally than an adversary when it comes to Forest Service vegetation treatments I must object and take exception to the A-BLT project. After a 35 year career with the Forest Service I am disappointed to see a project with so much disregard for the public trust, the ecological environment and laws governing vegetative management on our national forests. As a certified Forest Service Silviculturist (Region 1) for over 25 years, Burn Boss, Heli-Torch Manager, Aerial Sphere dispenser operator, Type 3 Incident Commander, etc. I possess a depth of knowledge gained though formal training, experience and worn boot-leather sufficient to make me a subject matter expert when it comes to forest vegetative management (at least that's what the FS said when I went to court on their behalf, Camp Salvage Sale 2004).

I object to the A-BLT project as proposed. Specifically, I reject the rational presented to exceed the 40 acre even-age regeneration openings size limitation ((36CFR219.11(d)(4)) as well as to the cover-forage ratio determination, specific to thermal cover(as defined in the 1986 Lolo Forest Plan, page III-84 Standard #7 and the Glossary page VIII-41) .

Greater than 40 acre Openings (Buster Brown Gulch, Lucky Boy Gulch and Therriault Gulch): The rational presented for the very large openings focus on the chance of root disease expansion and/or Douglas-fir bark beetle (DFB) mortality even though models outputs provided by the Forest Service, which tend to project worse case scenarios, place most of the project area in the low to moderate range for both DFB and root disease (*A-BLT Existing Condition Maps: Insects & Disease pgs 2 & 4). Basal Area stocking levels as measured by FS personnel, 110 ft2, are well below the >250 ft2 threshold of stand at high risk to DFB and may only expect volume loss of 37.1ft2 under DFB outbreak conditions if they were to occur (*2019 Forest Health Trip Report: A-BLT project pgs 1 & 3 paragraph 4) . This potential volume loss in itself does not constitute justification for the large regeneration cuts proposed. According to FHP Trip Reports (*2019 Forest Health Trip Report: A-BLT project & *2020 Forest Health Trip Report: A-BLTproject pg 3 paragraph 2 2019 report and pg2 paragraph 5 2020 report) DFB outbreaks usually last 2-5 years. The aerial detection map (*A-BLT Existing Condition Maps: Insects & Disease pg 1) provided by the district show an increase in successful DFB attacks in 2017, these would be trees attacked in 2016 and red (aerially detectable) in 2017. This timeline corresponds with my observations during stock rides, usually 2-3 times a year, in the project area. Traveling at three miles an hour with an unobstructed view gives me plenty of time to observe the forest around me. Given the 2016 DFB upswing in population and the 2-5 year normal duration DFB populations should be on the decline.

According to the Trip Report (*2019 Forest Health Trip Report: A-BLT project pg 2 paragraph 2 & 6) Nancy Sturdevant, experienced R1 Entomologist notes "Intermediate harvests in stands with evidence of root disease may(emphasis added) increase the incidence of root disease", additionally she goes on to say "I recommend both regeneration and intermediate harvests in the project area. Which treatment is selected will be dependent upon management goals, stocking densities and age and the presences of root disease (emphasis added)". I personally attended the Sanders County Collaborative fieldtrip on June 19, 2020. My conclusion regarding the presences and severity of root rot in the project area is from observations during the field trip and multiple subsequent trips (8/10,11,12,13,14, 11/23/20 & 3/9/21) to the project area. Root rot pockets pointed out during the June field trip and observed during my subsequent trips are infrequent, small in size (less than 1 acre)

and mostly occurred adjacent to roads in more productive swales. Roadside infections, activated by road construction from + 40 years ago, have spread relatively little over that period. At most these small infection centers could be treated with small regeneration harvest units less than 5 acres in size. The mountain side-slopes and ridgetops outside the swales exhibit little to no evidence of root rot and do not warrant the size and scale of regeneration units proposed. The route taken, undriveable road 16119, by FHP on June 23, 2020 appears to be the same as the fieldtrip as is indicated by the Latitude/Longitude in the Trip Report.

Considering the scale at which the regeneration cuts are proposed and the skewed level of perceivable root rot activated following construction adjacent to the road FHP personnel walked, their perceptions and predictions of the amount and severity of rot root elsewhere, away from roads, on the project are way overestimated.

The FHP Trip Report MFO-TR-20-03 (*2020 Forest Health Trip Report: A-BLT project pg5 paragraph 2) states "Armillaria root disease is a "disease of the site." It will be present, and difficult to eradicate from a site". If this is indeed the case then past harvests should be exhibiting root rot symptoms. However, my on the ground observations and a close examination of past regeneration harvests consisting predominantly of Douglas-fir in Therriault Gulch using Google Earth do not indicate the rot root present within the project area is as aggressive as it may be elsewhere. To further prove this point I'd provided the district with a google image and location of a timber sale unit commercially thinned in the 90s in the nearby Clear Creek drainage which had similar stand composition and levels of root rot as this project area (Document 1 - Attached, Ground location: 47.610277[deg] x 115.544036[deg]). In the image provided, dying (red) nor dead (down and standing) trees signifying active or accelerated root rot activity are not present as is normally predicted when treating stands with root rot. My point being the mere presences of root rot does not eliminate intermediate treatment or warrant not deferring treatment on future economically manageable units while implementing regeneration units <40 acres in between the untreated areas as was suggested in the alternative treatments letter dated July 22, 2020 submitted by Mark Sheets and I (Document 2 - Attached).

Prior to the fieldtrip I visited the project area to identify stops for discussion in addition to those I knew would be identified by the Forest Service personnel. At least in part to the discussion at one of my identified stops a portion of the units included from the Antimony Sale (Unit 24 & others) were dropped.

Unit 24, very similar to other Antimony units in species composition, insect and disease presences prior to harvest, does not exhibit the current mortality shown in Figure 2 of Trip Report MFO-TR-20-03 (*2020 Forest Health Trip Report: A-BLT project , pg 4) because it was not underburned (the district did try to underburn Unit 24, apparently conditions were not conducive). Whereas the mortality noted in the Trip Report MFO-TR-20-03 (*2020 Forest Health Trip Report: A-BLT project , pg 4 Figure 2 and paragraph 2), Figure 2 and discussed under the "Intermediate Harvest" heading of the Trip Report says "The 2015-2017 management activities likely (emphasis added) exacerbated Armillaria and DFB activity, resulting in increased mortality" going on to say "Thinning is generally (emphasis added) not recommended in stands with Armillaria, as it can (emphasis added) exacerbate disease infection and mortality rates. I can, without doubt, (emphasis added) assure the mortality observed by FHP personnel describe above within the Antimony sale area is solely due to DFB induced attack following crown scorch, root and root crown girdling as a result of prescribed fire with no contribution of root rot whatsoever.

In contrast to the statement in the January 11, 2020 (which should be dated 2021, oops) Request for Openings Over 40 acres-A-BLT Project (Document 3 - Attached, pg 3, last paragraph) "FHP agree with original proposed regeneration harvest as the only viable method of treating the extent of insect and disease issues identified in the proposed action." This statement is not included verbatim nor inferred in either of the FHP Trip Reports for the project. The Forest Health Protection personnel that have visited the project area have not unequivocally predicted unacceptable insect or disease mortality in the next several decades, particularly in deferred treatment areas between units if <40 acre regeneration or intermediate treatments where implemented. Additionally, I dispute the Hagle Mode 1-4 ratings in Table 1 of the Request for Openings Over 40 acres-A-BLT Project (Document 3 - Attached, page 2, Table 1, Opening Numbers 1-5) my field review of these same areas were more often than not a Hagle 0, occasional 1 and rarely a 2. The statement in Opening Number 5 (Document 3 - Attached, page 2, Table 1, Opening Number 5), "In many stands current outbreak of Douglas-fir beetle has caused 20-30% mortality already" is untrue, period.

In July of 2020 I and another concerned citizen submitted a letter with 3 additional alternatives for consideration (Document 2 - Attached) to the district. Even though the scoping period had ended the District Ranger (Erin Carey) said our alternatives would be accepted and considered. Two of the three include commercial harvest. Obviously we are not opposed to commercial harvest, rather we oppose the justification for most of the units >40 acres proposed in the ABLT project. .

Cover:Forage Ratio: I object to the analysis methods, lack of field verification and determination of the cover-forage ratios for the A-BLT project. It doesn't take a rocket scientist to realize the few remaining mature coniferous stands within the ABLT project area serve as a refuge for all species of wildlife,

particularly during heavy snow years. This is especially true when considering cumulative effects on winter range between Clear Creek and Antimony Creek as mapped by Montana Fish, Wildlife and Parks (Montana FWP), from recent timber management and prescribed burn implemented or authorized to be implemented and the Tri-Creek fire with subsequent salvage (1970s) in this important winter range (Document 4 - Attached). According to my course acreage calculations and field observations over half of the + 16,000 acre FWP winter range has had vegetation altering activities resulting in current optimum foraging areas for big game. This estimate does not including activities proposed to increase forage in the ABLT project or naturally occurring openings such as those in Valentine Gulch.

Many of the stands proposed for regeneration in the ABLT project are comprised of a Douglas-fir overstory with a dense and vigorous understory shrub component (ninebark, maple, willow, ocean spray, etc.). I contend it is critically important to maintain these types of stands that provide thermal cover, hiding cover, reduced snow

levels and forage during sever winters such as 2016-17 and 1996-97. I am intimately familiar with the Prospect watershed having worked and recreated there for more than 30 years. The unique cover and forage attributes of these stands are rare on winter range in the Prospect watershed and are important to maintain until developed elsewhere, such as in the Tri-Creek fire footprint, within this important winter range.

According to the Lolo methodology for determining cover:forage ratio (Document 5 - Attached; Winter Range Cover:Forage Analysis for MA 18, 22, and 23, Wrobleski, Tomson, Barr & Gustina, 2020, pg 1, Analysis Process, Existing Condition, item C) a combination of Vmap (Document 6 - Attached) attributes (tree canopy >40% and size class of trees >5 inch dbh) are used. Thermal cover is defined in the Lolo Forest Plan Glossary page VII-41 as "coniferous trees 40 feet or taller with an average crown closure of 70 percent or more." Lolo Forest Plan Standard #7 for MA 18 (page III-84) and # 6 for MA 22 (page III- 108) and MA 23 (page III-113) states " The majority (emphasis added) of cover should be thermal cover, that is , trees greater than or equal to 40 feet tall with a crown density greater than or equal to 50 percent". In the case of this project 50 or 70 percent is irrelevant. What is important is the analysis and the resulting conclusion has failed to distinguish the difference between cover for hiding and thermal cover. Additionally, even after repeated requests for evidence of project level field verification of the cover:forage findings none were supplied ((Document 7. Pg 1, last sentence-item c) & Document 8 - Attached , pg 2, paragraph 2)). VMap accuracy for the canopy attribute is 84% and only 62% for the tree size class attribute (Document 6 - Attached, pg 14). I have extensive experience using VMap on past Forest Service projects and have had recent conversations with Silviculturist working with current revisions of VMap. Without question anyone that has utilized VMap will agree findings must be field verified at the project level before utilized. In the case of this project a simple drive through windshield cruise should have been enough to alert someone to the disparity between VMap findings and the on- the-ground thermal cover defining attributes. I have spent considerable time on the ground in the project area measuring tree heights within VMap pixels depicted as thermal cover. Though there are many trees 40 feet or over there are also many tree less than 40 feet in height. I found this to be true in stands resulting from the Tri-creek fire as well as untreated mature stands. Without intensive field

collected data to accurately identify thermal cover verses hiding cover I dispute all findings related to cover:forage ratios, specific to thermal cover, on the project.

I invite members of the Objection panel to a simple google tour starting with the project area (47.562495[deg] x 115.544036[deg]). From there go westerly to view the Antimony Sale, then easterly viewing the 1973 Tri-Creek Fire and Shorty Hazardous Fuels project. In the Clear Creek drainage (47.610465[deg] x 115.576042[deg]) you'll see the portion of the Clear Creek sale completed in this 2017 imagery date, the remainder is now complete. Not seen is the 2 Short Sale, now under implementation, in the same vicinity as the Shorty Hazardous Fuels project or all the prescribed burning planned in Clear Creek. The contention more forage areas (large regeneration cuts) are needed now is absurd. In twenty years perhaps, now, no. Wrong place, wrong time.

In closing I must say I regret the time, energy and cost wasted by all involve in this project. I am not opposed to timber harvest, I've prescribed thousands of acres of regeneration harvests, several over 40 acres. A simple willingness by the all parties to modify the project to the alternatives, or a closer form of the alternatives, I and others had proposed would have saved a lot of time and money. These proposed remedies still exist.