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Title:

Comments: Thank you for the opportunity to comment on the Mud Creek Draft Environmental Assessment. I want to compliment you and your staff for all of the work that you have put into this project. I found field trips very informative and am grateful for the opportunity to meet with you and your staff at your office. The document and supporting reports are well written, complete and well referenced.

By in large, I support your proposed project. I agree with your purpose and need, especially reducing crown fire hazard potential, improving big game forage quality and quantity (especially for bighorn sheep) and decommissioning roads to improve elk security. Although I still have questions regarding the use of Condition Based Analysis (CBA), my comments deal specifically with habitat connectivity; old-growth and monitoring. Habitat Connectivity -Habitat connectivity and fragmentation are concerns for elk security and grizzly bear recovery and are particularly relevant to the Mud Creek Project. The Flathead National Forest has used the modeling tools of "Circuitscape" and "Linkage Mapper" to help address connectivity in a recent EA. I support this kind of approach and strongly suggest that you use these or similar tools when analyzing Mud Creek and future projects on the Bitterroot. I also support managing the transportation system, motorized and non-motorized recreation and other recreation activities to accommodate a diversity of recreation users while providing for the habitat security needs of wildlife.

Old-Growth Habitat - Properly functioning and quality old-growth habitat is often in short supply, takes decades to replace and is a hot button issue with many. However, our ability to manage forest vegetation to precisely mimic all of the ecological processes associated with old-age forests remains inconclusive. Therefore, wherever the amount of old-growth fails to meet habitat objectives, the Forest should avoid entering old-growth stands. Whenever treating old-growth habitat, the Forest should use prescribed fire as its first priority and should avoid building roads and harvesting legacy trees in designated old-growth habitat to the extent possible. I fully support treating forest vegetation adjacent to designated old-growth to help reduce the potential of losing old-growth stands to wildfire and/or to accelerate the recruitment of future old-growth habitat.

Monitoring - The Forest Service has rarely, if ever, been able to do comprehensive monitoring of projects. Without sufficient monitoring, it is impossible to ensure that management objectives are met, desired goals are achieved and adaptive management is effectively carried out. Since inadequate funding has often been cited as a reason for unsatisfactory monitoring, I strongly recommend that the Forest seek monitoring funds through all means possible including appropriations, partnerships and/or cooperative agreements. Monitoring should both document that all proposed work is completed as planned and that assumptions used to predict outcomes are valid.

Thank you for the opportunity to provide input to the Mud Creek Project. I look forward to remaining involved as you refine plans for treatment scheduling and implementation.