

Data Submitted (UTC 11): 4/19/2021 6:06:39 PM

First name: Scott

Last name: Merrell

Organization:

Title:

Comments: I oppose the Mud Creek Vegetation Management Project as proposed for several reasons, and I urge you to complete a thorough analysis in an environmental impact statement that addresses the specific impacts of the project, and retains and meets current forest plan standards and protects wildlife, old growth, healthy soil, and our climate.

The "conditions" based approach used for this project proposal violates multiple environmental laws including the National Environmental Policy Act, the Endangered Species Act, and the Wilderness Study Act. It also violates the Roadless Area Conservation Rule. If we don't know what specific activities will occur in what specific locations, the public cannot provide informed comments and the agencies cannot make informed decisions. There are several protected or sensitive species in the area that require protection and special consideration, including bull trout, Canada lynx, pearlshell mussels, wolverine, marten, and fisher. The broader area is also a Grizzly Bear Recovery Area, and the Forest Service and US Fish and Wildlife Service must provide for recovery of grizzly bears by natural colonization. The Draft Environmental Assessment does not adequately address the potential impacts of this project on grizzly bear recovery or habitat connectivity. Nor does it adequately address the impacts on the other sensitive and imperiled species, particularly given the proposed weakening of Forest Plan standards for this project.

Moreover, the Forest Service should not be amending multiple forest plan standards in order to allow for more impacts to elk and other wildlife, and to harvest more old growth or remove more coarse woody debris. Changes like that must be fully considered in an environmental impact statement and during the Forest Plan amendment process, not on a project by project basis. In the absence of an updated, revised Forest Plan for the forest, the Forest Service must apply protective standards, and ensure that species' viability is maintained.

The Biden Administration has committed to a goal of protecting 30% of our nation's land and water by 2030 in order to help mitigate the climate and extinction crises. We cannot afford to have the Forest Service persist with projects like Mud Creek that would remove old growth trees and coarse woody debris from our forests. We need to increase soil carbon storage and soil health, and leave trees in the forest. We need to protect wildlife habitat to allow species to adapt as our climate changes and human activities continue to encroach on their habitat. The Draft Environmental Assessment does not realistically assess carbon storage implications through a scientifically supported method, and a new analysis must do so.

Before a final decision is made for this project, the Forest should prepare a full environmental impact statement that includes specific project plans for the public to review. That EIS must include robust analysis of the impacts of the proposed project and proposed Forest Plan amendments on grizzly bear connectivity and recovery; soil health and potential loss of soil and carbon storage through removal of coarse woody debris and harvest of trees; and impacts to other wildlife from building new roads, logging, and the other proposed activities.