

Data Submitted (UTC 11): 4/19/2021 8:42:23 PM

First name: Laura

Last name: Jackson

Organization:

Title:

Comments: The following comments are in response to Mud Creek Vegetation Management Project #55744.

The vague parameters for treatment described in the present proposal are unacceptable for a plan to be implemented over 20. For example, there is no way to properly respond about the impacts of "openings" that could vary in size from 40 to 200 acres, particularly in an area this large with potential impacts on Bull Trout. In addition, given the snow pack this year and consequent road conditions, the closing comment date greatly limits any citizen investigation of on the ground potential impacts. A chance to do such impact research should be included in any genuine solicitation of public opinion, therefore an additional comment period that should allow such site specific impact analysis and comment needs to be offered.

The current planned treatment appears to not comply with the Elk Habitat Standards as specified in the Bitterroot National Forest Plan. These standards limit roads that affect elk security. The area is already heavily roaded and elk in the area are below population objectives. Of particular concern in relation to elk and other wildlife habitat are the three proposed atv loops which will connect existing roads and generally invite more motorized traffic that fragments habitat and is disruptive to natural animal behavior. Issues with erosion and stream siltation common to Bitterroot Mountain granite soil types are counter indicative for adding new roads in this area. Where essential for vegetative management it is clearly better to reconstruct naturally decommissioned roads or build temporary roads with defined closure and rehab specifications included in the plan.

Perhaps of greatest concern are the plans proposed parameters for changing our already minimal Old Growth Standards on the forest as well as amending current standards for thermal cover for wildlife and Coarse Woody Debris. This proposed plan would significantly expand old growth logging options and reduce established tree stand habitat maintenance that is essential as part of the natural forest life cycle on which many native species depend, species already suffering from habitat loss and fragmentation. Prospective Climate change is also an issue for these species that should be considered in the plan. The latest climate change research indicates that our best chance for reducing atmospheric carbon effects is through mature forest protection. This research should be weighed in any plan for fuels management that is dictated in part by wildfire concerns. Research is quite clear that the largest factor in wildfire danger in the Rocky Mountain West is climate change toward hotter and dryer fire seasons.

Thank you for your time and attention in considering the above.