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Comments: I grew up coming to the Bitterroot National Forest with my family to camp and fly fish along the river, and as a current student studying environmental science and sustainability at the University of Montana, I still consider it one of my favorite places in the world. While I understand the need for wildfire management within the Bitterroot National Forest with increased climate change concerns and other factors, the Bitterroot Front project's plan for thinning and commercial logging for fuels reduction and commercial harvesting will ultimately be a detriment to the health of the forest. Wildfires are good for the ecosystem- we must protect homes and people's safety, but this plan is too expansive and includes areas that should be managed naturally. Allowing wildfires to burn under safe conditions is a useful tool for restoration and thinning cannot mimic natural disturbance and it is not beneficial to biodiversity (Pollock & Beechie, 2014). In fact, studies show that thinning forests actually leads to greater severity fires, challenging assumptions that fire suppressed forests must rely on thinning and vegetation reduction (Bradley et al., 2016). Unthinned forests have shade that allows surface fuels to remain moist longer into the fire season and therefore increased thinning practices actually leads to higher severity fires (Bradley et al., 2016). Allowing forests to naturally develop, including allowing wildfires in areas where they do not impact human safety, allows for greater support of a range of species.

The "condition based analysis" laid out by the forest service in this plan to determine what is being implemented in what areas is not sufficient, and work performed in each area needs to be further specified for the public before the project is approved. At the present moment, this plan is not based on the science that will actually aid in fire management and forest health as it claims, but rather it opens up the forest to logging that will only benefit the logging industry. When it comes to climate change mitigation, logging causes increased carbon through the burning of logging debris piles and the reduction of trees. Additional road development in roadless areas also harms wildlife and is not in line with forest health. We should prioritize fuel treatment to vegetation close to homes and human development and implement home hardening techniques so that these homes pose lower fire risks. The USFS should find ways of managing the other parts of the forest that are for the benefit of the landscape and wildlife, in accordance with the 2012 Forest Management Act planning rule that emphasizes ecological integrity, rather than for the benefit of the logging industry.

References

- Bradley, C.M., Hanson, C.T., and Dellasala D.A. (2016). Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere*, 7(10), 1-13. <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/ecs2.1492>
- Pollock, M. M., & Beechie, T. J. (2014). Does Riparian Forest Restoration Thinning Enhance Biodiversity? The Ecological Importance of Large Wood. *JAWRA Journal of the American Water Resources Association*, 50(3), 543-559. Portico. <https://doi.org/10.1111/jawr.12206>