

Data Submitted (UTC 11): 5/15/2022 6:00:00 AM

First name: James

Last name: Olsen

Organization:

Title:

Comments: Dear Supervisor Anderson,

Please add my name to interest parties for the Bitterroot Front project.

As you may remember, I commented on the Mud Creek Project. I found the lack of a scientific basis for the proposed actions lacking. The lack of a reasonably well thought out assessment of alternatives based on science in the Mud Creek project represented a significant step backwards for the Bitterroot Forest compared to the 1990's when I was highly involved in responding to Forest Projects. While this may be dismissed as unnecessary in the political world, I allow us to resolve conflicts and sometimes collaborate in the late 90's to the point where there were no lawsuits filed on timber sales in the late 90's by the local forest watch group.

The Bitterroot Front project should correct this lack-of-science deficiency. There is plenty of literature out there that, though leaving us all still uncertain as to how to proceed in a complex landscape, can get us closer. Your scoping document list of references has studies that are 30 years or more old except and Feen et. al. definition of old growth and Scott's Fire Glossary of 2010, which I presume is based on his models from 2005, (I haven't looked but I hope by now that his models, both the input assumptions and the process modeled have been calibrated with real world events by now).

As I noted in an earlier discussion, the litigation in the early 2000's over massive post 2000 fire salvage sale was driven from inside the beltway, in particular, and interior department Presidential appointed employee who wanted to make a point. This flew in the face of the local environmental group having already gone out in the field with representatives of logging companies to agree on harvesting would make sense to both parties. Unfortunately, national politics got in the way and the sale was delayed while it was litigated by multiple groups only to have an agreement reached in a Court Ordered Mediation that ended up looking a lot like the results that were evolving during the field trips. Then, in a notorious lack of trust, the Forest Service pulled the money for the restoration component after the agreement was made.

One of the driving forces of catastrophic fire is dry fuel, almost always the consequence of a multi-year drought. This needs to be addressed - including the influence of climate change.

The project needs to describe the secondary and cumulative impacts of continued maintenance discussed in the Scoping Document of treatments of this project - to groom the landscape to keep in in the desired condition. Nature fills in open canopies in this forest, so that a regeneration cut in particular, but also thinning, is often more a fire hazard a few years down the line - as has been disclosed in EIS's produced by the Bitterroot Forest in the

past. In the end, nature also fills in regenerative cuts with even-age stands with closely packed canopies - you can see this walking around in the forest. In order for a project that proposes to reduce fire hazards, the decade's long natural response must be assessed in order for this project not to become a false promise that next time we have a drought that is ignited by dry lightning storm or a neglected campfire.

An alternative that does not include harvesting or road building in inventoried and uninventoried roadless areas is Required. This has been settled by Case Law (Friends of the Bitterroot, Inc. v. United States Forest Service, 900 F. Supp. 1368 (1995) - Beaverhead National Forest). It is unclear why any treatment for fire hazard includes roadless areas. In fact, it is unclear which timber harvest for economic benefits requires roadless harvests, since there is plenty of wood in already loaded areas.

It is not clear why the current Forest Plan for such things as elk habitat and snag retention is required for this project. An alternative that leaves the Forest Plan in tact as written is required.

The scoping does not include the objectionable process in Mud Creek for leaving the final decisions for individual treatments to be proposed and implemented without any appeal process. This process is not described in this scoping document - thus me and the public can assume that we will get a definitive, science based, detailed plan and comparison of alternatives during the NEPA process for the Bitterroot Front. (If this is not true, you need to revise and restart scoping).

I believe there are better processes to approach this, which has been discussed in years past. Engaging in a popularity contest may get good political results, but almost always fails to do what is intended on the ground. My experience is, that to get long lasting consensus, a diverse group is needed and useful, though it can be problematic if it does not include both 1) a roadless/wilderness advocate and 2) a real-live logger or timber mill forester - for the simple reason is that they tend to have the practical as well as passionate engagement in this long standing controversy. It has been done in this valley - not easy but doable IF the powers that be are committed to it and not doing it just for show.

James R. Olsen