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Comments: Bitterroot Front Project -

comments - 5.12. 22

My primary purpose in writing is to assure that I will be included in any future communications and updates and also to be eligible to file objections in the future.

I understand that the more specific my comments are, the better. But that's pretty much the crux of my comments - very little specific information has been made available and the FS working MO of a "conditions based" approach seems to be: we'll make decisions as issues come up and implement them at our discretion. You can yell at us after the fact, which, of course, will be much too late. You can't reconstruct old growth or any forests from the ashes and slash. Nor can you filter the sediment out of the streams and rivers or reconstruct wildlife habitat. This approach is very similar to what Matt Anderson introduced in the Tongass. I would think that the law suits and injunctions would give him pause before doing it again. Whenever anyone says "Just trust me on this" it's a pretty sure bet that they are not to be trusted. Most of us prefer a collaborative approach of working with the FS, all of us facing in the same direction and working toward a common goal. While the FS gives lip service to this approach, their current stance seems to be much more adversarial as far as I can tell.

More specifically:

The size of this project literally screams for a full EIS, not an EA and also for full NEPA compliance at every stage. A "conditions based approach" is clearly inadequate.

More importantly, the public needs assurances that they will be listened to - comments read and evaluated, not just going thru the motions and then doing what whatever you want to anyway.

Wildfire is uppermost in everyone's mind. However mitigation and reduction techniques are variable and controversial. The FS seems to be all geared for only one approach and they don't have an open mind. I will grant that the science is "fluid" and new information comes along quite frequently. All the more reason to have an open mind.

The amount and type of logging and thinning is of paramount importance. Clear cuts may possibly have some value but must be used infrequently at best. And the size of the cuts must be minimized and done in a manner conducive to the overall goals and aesthetics. Areas to be thinned and the techniques used must be implemented to minimize disturbance to surrounding areas.

Cutting roads thru IRAs to thin other areas makes no sense. Any new roads constructed for the project must be done under tight supervision with an eye to the consequences/impacts on the surrounding areas and watersheds. This includes upgrades and maintenance of county roads impacted by increased heavy traffic from workers and logging equipment.

There should be no new roads in wilderness areas, IRAs, WSA's, wildlife management areas either active or proposed, especially sensitive habitat more specific to species at risk, including grizzlies, lynx, wolverines, fishers, native bull trout, etc. - you get the point.

And it must be part of the plan to fully decommission these roads after completion of each section of work. Going section by section, start to finish, will speed the recovery of both the forest itself and the wildlife habitat. Working section by section from the start means impact on wildlife, etc. will be minimized from the start.

Education of the public, especially as it concerns wildfire and wildlife habitat, especially in WUI areas, is of utmost concern and is the surest way to get buy-in and cooperation for projects going forward.

Last but not least is the cost. Obviously the cost of just doing the work itself is important and must be scrutinized for efficiency. But also the secondary costs, some mentioned here - public education and ongoing road maintenance both in the forest and out - must be addressed in a realistic manner. "We'll cross that bridge when we come to it" just doesn't get it.

Thank You,

Mark Van Loon