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First name: Andy Last name: Roubik Organization:

Title:

Comments: Regarding the Bitterroot Front Project

Dear Sirs and Madams:

I have been working as an arborist for the last 30 years, the last 28 years here in the Bitterroot Valley. I am self-taught by extensive reading and perhaps more importantly by observing trees in natural forests and in man-manipulated environments, from clear-cuts to urban centers. My observations have guided my work here in the valley to the benefit of many homeowners, businesses, communities, and municipalities. What I have learned is that nature knows best, and we know little.

Please take the following points into consideration.

- Curtis M Bradley, Chad T Hanson, Dominick A DellaSala published a study on 10/26/2016. This study looked at 1,500 fires affecting over 23 million acres between 1984 and 2014. Their findings may be startling to you. All decision makers should read this study. It is the best available science. It finds that protected forests (unlogged) burn at a lower severity and retains more carbon than unlogged areas. This disputes and disproves the old theory of some that logging will reduce intensity of burns - quite the opposite.

This study alone should have forest managers scrambling to adjust their plans of action. The old point of view that we can log our way out of forest fires, seems to be guiding this extreme plan referred to as the Bitterroot Front Project and many others. Please read this study. The forest service should be trying to limit carbon emissions just like all other government agencies (and indeed most of the world) rather than causing greater carbon emissions as logging does.

- Fuel reduction should only be done in the areas immediately surrounding homes in the wildland interface to create a defensible space.
- Old growth trees should not be cut. Please comply with the recent executive order to preserve and protect mature and old growth forests and do not cut any trees of 16" diameter or greater.
- Do not cut any alder trees regardless of their diameter. These trees are extremely important to soil health as they store nitrogen in the soil for all plant life to use.
- BNFS has too many roads for you guys to maintain currently. It must be understood that making new roads would put you even further behind. That is non-sensical.
- Stay out of burned areas. These areas have lost a considerable amount of organic material already and they need all the remaining material for regeneration.
- We know this is a migration corridor for wildlife. In the face of climate change and the accompanying warming trend, the north south corridors are going to be increasingly important to vulnerable wildlife including the Lynx, Fishers, and many others. New roads (and the many existing roads) and clearcuts fragment and degrade these corridors.

- Every opportunity to restore beaver to the landscape should be seized. Beaver activity has been conclusively proven to impede forest fires. Beaver also reduce sediment loading in waterways, thereby helping mitigate the adverse effects of unmaintained roads that exist and that some in the forest service want to build. Please respect all riparian zone protections. Riparian areas are the most productive for wildlife. Beaver dam analogs should be installed at every opportunity to mimic beaver benefits and put out the "welcome mat" for naturally occurring Beaver. This falls in line with the BNFS forest plan (II-20) that states: Beaver will be introduced into suitable riparian habitat.
- Stay out of recommended wilderness areas. They were recommended for wilderness areas because they have wilderness qualities. Logging activities in these areas will destroy these qualities. Instead, we should join together to see these areas move forward toward full wilderness protection status. Remember, protected forests burn with less severity than those that have been "treated"!
- Do not fragment the comparatively tiny inventoried roadless areas anymore by logging or road and trail building.
- No Clearcuts. Aside from the multi-faceted catastrophic cost to the ecosystem, clearcuts are ugly, even from a distance. This valley, our home, is becoming more reliant on tourism for our economic growth. Burned areas look and are natural. We value our viewsheds and all want a beautiful view. This plan would greatly degrade our views and potential tourism income for decades.

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Thank you in advance for considering these points.	
Sincerely,	

Andy Roubik

Corvallis