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Comments: Bitterroot National Forest

Kimberly Smolt, ID Team Leader

Attention: Forest Plan Amendment

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Ms. Smolt:

Public Comments Regarding the Draft EA for the Forest Plan Amendment for Elk, Old Growth, Coarse Woody Debris, and Snag Forest Plan Components

Piecemeal Revision of the Forest Plan, as the Bitterroot National Forest is initiating with this Amendment reflects piecemeal thinking. That is not a legal or functional way to manage our existentially essential ecosystem, which is, famously, a wholistic system. Your approach is another reflection of the fact that the FS, quite literally, does not see the forest for the trees.

An updated integrated Revision is long overdue for the whole 1987 Bitterroot National Forest Plan. Recently the BNF began the Bitterroot National Forest Plan Revision EIS process with much fanfare. Now, for reasons left undisclosed, the FS has decided to switch tracks to a shortcut Forest Plan Programmatic Amendment using an EA with insufficient analysis. The Amendment does not consider the Forest as a whole, but separates out certain vital components: old growth, elk habitat, snags and the surface layer of soil.

These components comprise central aspects of our oldest trees, biggest trees, wildlife habitat and foundation of forest, the soil. The proposed Amendment effects the entire Forest from its source within the forest floor to the highest tree tops, but it does so in the absence of a thorough analysis of both the components in isolation and in concert as they work together with interactive effects across the forest. The Finding of No Significant Impact with this FP Amendment proposal can only be a result of willful blindness by the BNF in the interest of taking a procedural shortcut. The Finding of No significant Impact is arbitrary and capricious. The proper NEPA process would be an EIS and analysis of the Forest as a whole informed by an up to date Analysis of the Management Situation. Implementation of the proposed Programmatic Amendment would lead to programmatic resource damage across the Forest.

Damage to old growth, soil and snags can take centuries to recover, if ever.

The long history of unrelenting BNF get-the-cut-out mentality has put further commercial logging in a bind constrained by sustainability and legal limits, so Supervisor Mat Anderson is proposing to move the goal posts in order to continue getting the cut out. Expedience seems to be the driving force driving forest management beyond the headlights in this leap without looking. This is reckless to the extreme when you think about what is at stake.

Not only are the goal posts being moved, but the sidelines of legal limits, FP Standards, are being eliminated and

replaced by vague aspirational "guidelines".

I object to the improper, inadequate and unwise NEPA process being used by the BNF. Implementation of a Programmatic Amendment derived from such a process would open the BNF to unrestricted accumulation of resource damage for decades to come. The self-acknowledged fact that the BNF cannot follow the existing Forest Plan in fundamental aspects means that Forest Plan Revision is necessary before actions with significant impacts are proposed.

It is a waste of agency time and budget as well as an abuse of public involvement to proceed with this cart-before-the-horse proposal.

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