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Comments: Amending the BNF Plan in this way limits the grounds for effective future public discussion or comment on forest projects. It establishes lesser standards and largely mandates only guidelines, giving our community no grounds to challenge the agency's choices for our own good in a county where the agency manages over 50% of the land.

Because of the above, the agency Draft EA conclusion of "no significant impact" and therefore no need for an EIS is not acceptable. In the context of present and expected climate change, anyone concerned about the objectives identified in this amendment (Old Growth, Snags and Coarse Woody Debris, Carbon Storage and Sequestration, Fire and Fuels, and Soils) should comment requiring a full EIS for this Programmatic Amendment to the BNF 1987 Forest Plan to be evaluated. before it is approved.

This Programmatic Amendment and Draft Environmental Assessment fail to adequately evaluate or address, as required, the climate impacts of its Old Growth, Coarse Woody Debris and Soils revisions to the Bitterroot National Forest Plan, or how these revisions may affect wildfire risk. The proposed Amendment diminishes protection for old-growth stands, and introduces loopholes that will allow increased harvesting of old-growth and mature trees. This obviously is a significant impact of the Amendment in terms of carbon sequestration and climate change expectations. The Amendment's admitted lack of inventory data on existing old growth on the forest potentially allows cumulative impacts that are not delineated, much less given prescribed limits, as would be scientifically appropriate to evaluate climate change impacts. The Draft Environmental Assessment, with its false claims of "no significant impact," does not justify implementation of the proposed Amendment to the Bitterroot National Forest Plan.