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Comments: I have trouble commenting on the details of the plan, as detailed analysis would require knowledge of the specific sites at which any actions will be applied. Such a landscape-level plan demands landscape-level comments:

If the justification for much of this massive project is to reduce fire hazard and the potential for loss of property and life, then the single most productive action the Bitterroot National Forest could take is to engage in "coordination" with the Ravalli County Commission. The commissioners feel comfortable advising the BNF on forestry issues, but coordination must be a two-way street, and if the County is advocating certain forest management actions, then by the same token the USFS has a right, if not an obligation, to advocate for governance actions on the county's part.

The Bitterroot National Forest Supervisor should advocate, at every opportunity, that the Ravalli County Commissioners enact reasonable regulations regarding new and existing construction, and modification of existing landscapes, to comply with fire-safe practices in the wildland-urban interface.

County-led land use regulations are the best hope of preventing a major fire-related disaster and, based on current science, I strongly believe that such regulations would have a more profound impact, at less cost, than any amount of thinning or fuels treatment, in terms of protecting life and property. The BNF should vigorously pursue the implementation of such regulations through their regular coordination meetings with Ravalli County officials.

Next, I find it offensive to see a proposal of this scope based on a Forest Plan that dates back well into the last century. We need an updated Forest Plan before anything of this magnitude is considered. Back-dating exceptions to an 80's-era Forest Plan in order to justify and permit a new project, in the face of both technological advances and an evolving climatic regime, is unacceptable.

When and if the project goes forward, road construction and re-opening of decommissioned roads should be minimal, in order to protect habitat and avoid increasing stream sediment loads. Old-growth stands should be left untouched, and grizzly bear and wolverine occupation of the zone should be centered in management action proposal.

A full EIS will be necessary. The proposed Environmental Analysis is insufficient in scope for such a large-scale project.

There should be no logging or new roads in Inventoried Roadless Areas. They were inventoried for a reason, and they were probably roadless for a reason, as well. Let's preserve their roadless character until such time as a thoughtful process decides their ultimate disposition.

Lastly, in the absence of site-specific recommendations in the draft proposal, there need to be opportunities for meaningful public input when site-specific actions are considered.

Respectfully submitted.