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Comments: 9/15/23 - Comments on the BFP

The USFS should have made news releases about four phase treatments, and the 5-20 year period when the BFP applies. News releases should have noted, as in the EA, that about 70% of the BFP logging would happen in 2024. Press releases definitely should have included a set of representative maps of phase two treatment areas.

Failure to include ANY of the above, in the first BFP news release in the smaller readership local newspaper, OR LATER, significantly reduced the credibility of local USFS news releases.

It's rude, unethical, and maybe illegal, to withhold the need to know information, then ask for public comment.

That was a terrible thing to do.

Withholding information the public needs to know, may be contrary to Section 40806 of the Bipartisan Infrastructure Law(BIL). We need to know how much BIL money might fund the BFP. If it's a very large amount of money, like 15 or more million dollars, we have need, and may have the right, to see how that money will be put to useful, not harmful, purposes.

The 386 page EA should have been a searchable document. It should have included a summary written for the public. Such would have increased much needed project familiarity and local USFS credibility.

For EA study of treatment options within the 57 mile long project area to be credible, the study conclusions must improve, not reduce, active wildlife cross range crossing numbers which are vital for cross fertilization. The BFP must maintain and improve cover where Elk yearly cross from the Sapphire range into the Bitterroot range.

In general, the USFS has not shown good faith in either its BFP EA study, or in press releases about the BFP. In fact, the USFS may have shown bad faith in its communications about its BFP. Public input from last year's staged scopings was grossly neglected, or worse yet, possibly intentionally excluded. Not knowing which, the public may infer that this year's local USFS BFP news releases, especially the EA, were done in bad faith.

Considering the above 1. through 8. comments, I conclude that so far, USFS communications about BFP have been made in bad faith.

In present, also emerging, stands of old growth, the subsurface life forms, hydrology, and chemistry must be maintained not degraded by vegetation management.

To regain credibility and reduce word based misunderstandings, I strongly suggest that local District Rangers select one old growth area for demonstration of stand improvement. Say a Demonstration area where like at Larry Creek, road access is safe and convenient.

Then give public notice inviting people to go on that Demonstration area. Also to meet there to hear and see the District Ranger point out treatment that will improve that old growth area. The District Ranger must evaluate public voiced comments about proposed treatment of that Demonstration area. And pass collected information on to the Treatment Contractor.

The BFP EA states inconclusive results from different modes of vegetation management of relatively higher altitude thermal cover. I strongly suggest that early on, the District Ranger select a thermal cover area, proximate to lower elevation area to be impacted by thinning, and reducing vegetation. And show the invited public how that (Demonstration) Thermal Cover area would be treated to maximize Elk effectiveness. And District Ranger evaluate public responses and convey consensual vegetation treatment concepts to the Treatment Contractor. I am seriously concerned that wide scale low and medium altitude vegetation reduction will increase the need for higher elevation all season browse for elk.

The USFS should wait a year or two before treating vegetation in other such BFP higher altitude thermal cover areas. Treating those areas should be congruent with Elk effectiveness knowledge acquired from observations in the Demonstration Thermal Cover area(s.)

Achieve uniform thermal cover vegetation objectives through on site trial, and achievement. Do not immediately force on all of the BFP a new, locally untested, regime of vegetation management for thermal cover areas critical

for Elk habitat and effectiveness.

Do not reduce thermal cover adjacent to the high side of clearcuts.

Identify which major streams would likely be degraded, by a combination, or individually, by: road building; road crossing; commercial cutting; non commercial cutting; vegetation management; and burning.

Equally value road comments, between people who value Elk for reasons mostly other than hunting, and those who value Elk for hunting and for other reasons.

If the Larry Creek present treatment is representative of BFP objectives, consider going there for a triple header. Show that area. And a proximate old growth area to improve. And a higher thermal cover area to test a particular vegetation treatment mode of Condition Based Management. A lot of photo opportunities in one day!

I note that, for the Bitterroot front, there is no stated substantive emergency predicate for the USFS to avoid NEPA.

Gosh, someone forgot to underline the fact that structures proximate to the four "highest risk" firesheds should themselves be protected from wildfire.

What's the bottom line, aggressively treat the entire front, to reduce emergency risk to certain property owners?

That's what it looks like to me.

What's been the purpose? Withhold the need to know information, so property owners and residents proximate to the four "highest risk" firesheds, will have a biased opinion about the BFP?

I conclude that the USFS has withheld so much need to know BFP information, that there is no body of publicly available sufficient information, for the public to use to make favorable Comments about the proposed, partially public funded(BIL), imminent BFP.

It would further distort reality, for the USFS to make a future claim that favorable Comments about the BFP justify the BFP!

Such distortion would certainly evidence bad faith by the USFS!

USFS, put your best foot forward! Treat us like we are people, not objects. We know some precious Bitterroot Front stands of old trees that we want to be conserved. Some stands USFS is not aware of. The USFS being locally limited, as noted in the EA, to coarse data, and[not ubiquitous ]field observation.

Respectfully submitted,

Bob Williams

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