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Comments: Bitterroot front EA comments

General Comments

General comments are mostly all that is possible given the general nature of information provided in the Bitterroot Front EA. This project covers a huge part of our valley; it is, as the BNF forest supervisor has said, a landscape scale intervention. As such it deserves full Environmental Impact Statement consideration with all opportunities for public involvement offered by NEPA available. The use of an EA and only limited "condition-based analysis" data with emergency fast tracking is inappropriate and inadequate for activities of this consequence that we, the public you are supposed to serve and whose dollars you are spending, will long be living with.

The decision to use these inadequate assessment processes is clearly in violation of what NEPA was intended to remedy, a violation of the spirit and possibly also the letter of this law. It represents a reversion to early and mid-20th century USFS practices of doing what the agency thought best with our landscape without considering real community impacts, or the knowledge and experience of those who had long lived in and had intimate knowledge of a given locale. The BNF chosen process, in fact, appears to deny the realities of the Monongahela Decision which declared such large scale, sweeping generalized timber practices were a violation of the Organic Act that set out the parameters of what would become our USFS.

It was the Monogahela Decision in 1975 that halted the USFS intention at that time to clearcut most of the Bitterroot Front, in the name, then too, of reducing fire risk. The subsequent research indicating that those proposed fast drying and weedy clearcuts often worsen fire risk has clearly validated the decision which halted that vast clearcutting project. As with the USFS long-term 20th century fire suppression, above all and everywhere, policy of the USFS, we now learn from science that such sweeping interventions with natural processes have unintended and often risk increasing consequences. Fires in Denton, MT, near Boulder CO, and in Hawaii make it clear that in our current climate conditions, removing forested and native vegetation do no reduce fire risk.

Detailed on the ground analysis and consideration are required to, at least, give us some assurance of what consequences we can expect from such interventions. Serious debate among different views and data conclusions with public involvement are essential. The limited data offered for discussion and further limited options for public consideration of what is actually going to be done to our landscape are, to state the obvious once again, not in anyone's best interest. This is more particularly the case when there is sound scientific research suggesting that some, if not many, of the Bitterroot Front projects, whatever they may finally be revealed to be, will likely increase the fire risk to our lives and properties. Further, we are being asked to give approval without any essential details, to trust unnamed specialists. It is possibly also relevant to note that a number of such specialist positions are currently unfilled on our forest and have been so for some time. The agency itself has admitted that it is not fulfilling already given project monitoring obligations due to lack of staffing. It seems only reasonable to ask that landscape scale new projects not be pursued until qualified staffing to assess and manage implementation impacts is in place. Specific pre-project treatment data for specific areas should be available for public consideration and comment; post project monitoring for effectiveness and any needed follow up should be guaranteed with dedicated funding secured.

Specific areas of concern in the draft EA.

Fire and Fuels and Climate

Generally, the most important point to be made here is that the documented climate change we are experiencing, and that is expected to continue for the foreseeable future, is presently changing research based recommended response patterns for fire risk reduction. There is strong, peer reviewed research that brings into question some of the assumptions behind what the Bitterroot Front EA takes for granted. For this reason alone, a full EIS weighing current scientific investigations and conclusions is essential for this project. The following is a short list of some specific research that now needs to be considered as it calls into question historic assumptions about fire risk reduction and fuels management. Simply put, it is no longer clear that the proposed Bitterroot Front Project actions will result in the advertised goal of reduced fire risk for the Bitterroot Valley in our current fire weather regime. They may, in fact, even have exactly the opposite result.

In the 2023 Mike and Mabelle Hardy Fire Management Lecture at UM, Dr. Jennifer Balch (Associate Professor of Geography, Director of the Environmental Data Science Innovation & Inclusion Lab, University of Colorado Boulder) noted that invasive species (and not only cheatgrass) ground cover doubles rate of spread for wildfire in comparison with undisturbed native habitat understory regimes. Larger forest openings produced by thinning, generally hotter and drier and often dominated by invasive species, may increase fire risk. Shorter flame lengths won't help if the fire arrives at your door before any fire suppression.

Research by Dr. Beverly E. Law (Professor Emeritus of Global Change Biology & Terrestrial Systems Science, Department of Forest Ecosystems & Society Oregon State University) specifically reveals that plantations of younger (under 20-30 years) conifers give off CO₂ while older ones absorb it. This means that although older growth trees may gain carbon mass more slowly than younger ones, they are actively reducing carbon in the atmosphere rather than adding to it. Calculation of old growth carbon sequestration value need to reflect this in assessing old growth value in our current climate situation. Our high percentage of older trees appears to be an especially important asset to be protected. (EA: On the Bitterroot NF the percentage of forest greater than 80 years old was 64.1 percent in 2011) For a simple lay person report see: <https://www.youtube.com/watch?v=LDdKOMvIKyg>

Jack D. Cohen (retired Research Physical Scientist, USDA Forest Service Missoula Fire Sciences Laboratory.) General research on what best reduces fire risk to communities. It is what the homeowner does in the 100 feet around the structure. Forest treatments at a greater distance have minimal risk reduction value in comparison, given the current climate of increased aridity, heat, and, above all, extreme wind events.

Soils

In general terms, my reading indicates a major inadequacy in the EA soils evaluation in that no consideration is given to overall soils systemic function, most particularly in relation to native undisturbed plant communities. Research in this century has clarified that there is a lot more going on subsurface in soils than was historically understood (for example, mycelium studies, etc.). Given what this more recent research has revealed about what we have failed to understand about soil systems in the past, the likelihood of our understanding still being now far from complete is obvious. The Precautionary Principle needs to be applied here; we should avoid activities that will add acres of disturbed soil in our landscape.

The general conclusions justifying soil disturbance in the final section of the Soils Effect Analysis (Environmental Consequences of No Action v. E environmental Consequences of the Proposed Action) mainly depend on the assumption that severe fire with the soil damaging heat levels may occur in whatever turn out to be the specifically define areas of project activity. This, of course, cannot be predicted. This kind of damaging high intensity fire is not historically common, and usually very localized. In this EA disturbance by treatment over large areas is being preferred over the no activity alternative, based on the possibility of such severe soil damage occurring. Planning widespread damage, particularly in previously undisturbed (and/or roadless) areas on the chance such areas may be at some time harmed by fire is not reasonable. Left alone, over time they will recover

their productivity as they always have. There is also now clear research indicating that undisturbed soils with native vegetation intact retain more moisture and can have an invaluable role in slowing fire spread. Recent documentation indicates these undisturbed habitats spread fire at half the rate of areas of invasive weeds-and this is the case even when cheat grass is not involved. The kind of widespread disturbance the Bitterroot Front Project intends could actually increase our local fire risk. There is nothing in this EA to indicate that the factors involving this probability have been considered, or will be considered, by those "specialists." This definitely makes questionable your proposed condition-based analysis of not yet defined activities. In any case, you are precluding any public input at the prospective time of analysis and decision.

As I am not a certified soil scientist, I can only comment specifically on what I have observed in my own neighborhood, without knowing if the EA problems here are present in the widespread areas the project is intended for. Looking at your Soils Risk survey map (P. 4) with categories colored in relation to your table of study areas (p. 3), confusing and conflicting information suggests the on the ground data assessment to date is not at all complete. Again, you are asking for public comment before there is anything clear and precise on which to comment. The table on page 3 indicates for the south fork of Lost Horse: 3,871 acres rated, with the majority in categories A, B, and C, but on the map there is no color coding shown to indicate what is being referred to in the entire South Fork Drainage, except possibly a small area in the historic Lick Cr. Projects area, well below the point where the south Fork has joined the main Lost Horse Cr. On the map, for the main Lost Horse drainage, there is simply no information on soils for most of the drainage-it looks like down to the boundaries of the West Side already completed project. But the above-mentioned table points to 928 acres, with none of it in documented past management impact areas. Again, the given data is unclear/inadequate. Does the lack of any soils data to be considered indicate that there will be no project activity in the main Lost Horse drainage above the turn off for the road to Lake Como-or thereabouts, not entirely clear where the data boundary falls from the provided map. If no activity is intended in the main Lost Horse canyon, why is it being included in the various project maps? If it is intended, soil maps must be provided-this is basically a decomposed granite soil area that in effect is quite vulnerable and productivity, especially of native plant communities, generally shows very long term, if not permanent damage following disturbance.

Scenery

The map and Key Observation Points on pages 5 and 6 look fine on paper, but what is actually seen has recently proved to be different, reflecting failure on recent projects of the BNF to carry out required standards of visual screening. In particular, I refer to the now visible roads toward Observation Point that can be seen driving from HWY 93 west on Lost Horse Rd. No roads were visible after the 2016 fire and we see them now as the direct result of fire risk reduction logging activity in the subsequent years. The extremely large extent of the Bitterroot Front project requires specific detailed visual quality impact information be made available for local public comment and input before any final project decision, much less implementation. The EA and "its "condition-based analysis" simply deny the public the opportunity to be involved in decisions about what we will be looking at long term, likely long after the implementing "specialists" have moved on.

Wildlife and Transportation

Generally, it is impossible to be clear which road types are being treated where and how on the maps provided online. The upgrading of 'undetermined roads' for integration into the National Forest Road System is of concern, if it is occurring in areas that are otherwise generally unroaded and which thereby have value for wildlife species sensitive to human presence. Particularly long time overgrown roads in the "undetermined" category should not be upgraded, either temporarily or permanently. Even though technically "closed" to the public, experience locally indicates they will be used illegally with adverse impact on wildlife and vegetation resulting. Treatment of fuels in these types of areas should be foregone in the interest of maintaining established vegetation and old growth for wildlife. There is no way of knowing exactly where or when, if ever, severe fire may occur. Established "old growth" with native vegetative understory and de-facto roadless areas should not be

opened and disturbed on the chance that severe wildfire might occur in an area. Aside from providing cover and potential wildlife value, such areas are now documented as retaining moisture better than managed forest open areas. It should be noted research increasingly suggests such undisturbed and "old growth" areas slow fire spread better than open grassy areas, especially in times of increasing heat, aridity, and extreme wind such as we are presently encountering.

The only road construction proposed about which I have direct knowledge is the addition in management area 5 in the headwaters of Lost Horse Cr. Access to the SNOTEL site has long been viable without any new road. Given the ever-increasing recreational use of the Lost Horse corridor, and the more than occasional disregard of regulation by some users (firewood cutting, destruction of gates during seasonal closures, etc.) This corridor's natural character (which is its particular unique asset) and wildlife are already suffering from increased human presence and interaction. Realistically any road in the area will be used illegally, even if technically closed. Therefore no new road should be constructed, and SNOTEL access should continue to be conducted as it has been historically.

The concluding section of the EA wildlife folder describing impacts of the action/no action alternatives seems nonsensical. The phrasing "project activities may affect, but are not likely to adversely affect" is unclear in meaning, especially when applied to sensitive species. Simply put, any effects are likely to be adverse and drawing a line between what is adverse and what is not adverse is an impossible judgement call, clearly biased in this project toward human convenience and tree removal. If the proposed activities are clearly expected to have adverse effects (Whitebark Pine and Bull Trout are specifically noted) this is clearly a reason to limit project activities in any given area. When the choice is between possible adverse wildlife impacts and possibly mitigating a possible someday, sometime wildfire risk, decisions on project area and activity should prioritize wildlife welfare, except in a case where the BNF lands directly border private property with occupiable dwellings within 200 feet, essentially making it important to treat USFS lands within the Home Ignition Zone.

Thank you for your time and attention to the above.