

Data Submitted (UTC 11): 9/24/2019 6:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Based on what I have read in the September 6, 2019 "Dear Interested Party" scoping letter for the Mud Ck timber sale there is nothing specific for me to write specific comments on. If you really wanted meaningful comments you would have included this information like other national forests. If you think I'm wrong I'll provide the links to many current R -1 scoping packages that include estimated harvest acres and road miles.

My comments on this timber sale

The comments are clearly labeled. Each one begins with the word **Comment** that's bold, purple, and underlined. The text of the comment are bold and green. Please prepare meaningful (emphasis added) responses to all of my comments and include them in the final EA or EIS in the "Response to Comments" section.

Comment: Your September 6, 2019 scoping package at page 1 tells the public "Thirty-five percent (17,171 acres) of the project area which includes private property is considered WUI, as defined by the Bitterroot Community Wildfire Protection Plan. Dr. Jack Cohen (a retired USFS fire physicist) developed the most effective treatment to reduce the risk of wildfire damage to homes in the WUI. His methods are used worldwide yet your scoping package fails to mention the word "Cohen."

Comment: Your September 6, 2019 scoping package at pages 15-17 tells the public the silv RXs that will be used will include 1) Shelterwood with reserves, 2) Seed tree with reserves, 3) Clearcut with reserves, 4) Irregular Selection, 5) Commercial Thin and 6) Improvement Cut. This is a detailed description of your harvest plan. Based on the fact you know each of the 6 RXs you will use, I believe you know the location and size of every unit. No other national forest in the United States presents maps and vegetation cover type data (to the nearest acre) in such detail and hides the planned harvest acres from the public as you do here.

Comment: Your September 6, 2019 scoping package at pages 20 tells the public there will be new "temporary" and "long term specified roads" construction. You know exactly where these roads will be built yet you choose to withhold the mileage estimates.

Comment: Your September 6, 2019 scoping package at page 21 tells the public there is a "Need for Programmatic Amendment" to your forest plan. You make the following unsubstantiated statements:

"Guidance in Lyons et al. (1983) indicates the elk habitat effectiveness criteria should be applied to areas greater than 3,000 acres. The Bitterroot Forest Plan applies the criteria in Lyons et al. to the third order drainage scale"

"This discrepancy between the guidance provided by Lyons et al. and the Forest Plan has created a situation where the existing condition of many third order drainages are not in compliance with the Forest Plan standard. The Forest is considering alternative metrics for elk standards because more recent scientific literature indicates that additional factors including: forage abundance, distribution, availability, and quality; distance from open roads during hunting seasons; and hunting pressure, may affect elk use patterns and distribution across the landscape."

Other national forests in R-1 use Lyons et al. (1983) to assure their projects do not harm elk habitat. You are discarding the Lyons guidance in favor of your outdated forest plan that should have been amended long ago to justify logging and roading more than you should. Other national forests in R-1 based their elk habitat objectives in Lyons et al. None have amended their plans as you propose to do because Lyons et al. works for them.

Your P&N at page 8 says There is a need to improve habitat and forage quality and quantity for bighorn sheep, mule deer, elk, and other regionally sensitive species." Abandoning Lyons is not the answer.

Comment: Your September 6, 2019 scoping package at page 1 tells the public "Thirty-five percent (17,171 acres) of the project area which includes private property is considered WUI, as defined by the Bitterroot Community Wildfire Protection Plan. Dr. Jack Cohen (a retired USFS fire physicist) developed the most effective treatment to reduce the risk of wildfire damage to homes in the WUI. His methods are used worldwide yet your scoping package fails to mention the word "Cohen." Please see Opposing Views Science Attachment #11. After reading it you will agree his methods must be used.

For those receiving CCs of this letter here's the link to the September 6, 2019 scoping package so you can verify my claims:

https://www.fs.usda.gov/nfs/11558/www/nepa/111153_FSPLT3_4791620.pdf

I'm sorry the personnel people in R-1 don't use a more effective vetting process when they hire line-officers.

I won't waste any more of my time on this.

Sincerely,

Dick Artley (retired forest planner, 1900-1 beginning NEPA instructor on R-1, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator on the Nez Perce NF in Idaho)