Data Submitted (UTC 11): 8/23/2021 11:00:00 AM
First name: Michele
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Organization:
Title:
Comments: Thank you for the opportunity to respectfully submit this objection to the U. S. Forest Service's July, 2021 draft decision notice (DDN), finding of no significant impact (FONSI), and the revised 2021 environmental assessment (FEA) for the Mud Creek Project on the West Fork Ranger District of the Bitterroot National Forest.

Under the Draft Decision, the Forest Service's selected alternative includes estimated potential treatments of 4800 regeneration cuts, 8900 acres of commercial treatments, 26, 282 acres of non-commercial treatment, 4800 acres of prescribed fire site preparation, 28,235 acres of prescribed fire low severity, and 12,125 acres of prescribed fire mixed severity. It includes 22 or more openings > 40 acres no greater than 200 acres, to be located in general focal areas ranging from 71 acres to 585 acres. Project proposes 8.95 miles of specified road construction, 33.8 miles of temporary roads,a 0.4 mile segment of co-incident route would be closed yearlong to all motorized traffic including trail vehicles. FEA at 39, Table 10. Of the approximately 11.3 miles of undetermined roads, approximately 0.76 miles of undetermined roads needed for future management activities would be added to the NFS road system as maintenance level 1 roads, some road segments in this category would be decommissioned as roads, added to the National Forest System trails system, and managed as trails open seasonally to vehicles 50 inches or less in width, and others would be stored or decommissioned. Id.

I submitted timely, substantive comments and this objection is timely filed. The project area encompasses approximately 48,486 acres in the Bitterroot National Forest (BNF) and includes the entire West Fork Bitterroot River-Rombo Creek watershed and portions of the Nez Perce Fork-Nelson Lake, Little West Fork, West Fork Bitterroot River-Lloyd Creek, Lower Blue Joint, and West Fork Bitterroot River-Painted Rocks Lake watersheds in the Bitterroot Mountain Range. The area is accessed by the public mainly from the West Fork Highway and the Nez Perce Road. The responsible official is the Bitterroot National Forest Supervisor Matthew Anderson. As required by 36 C.F.R [sect] 218.8(d).

Issue: Conditions based management

Thank you for reducing the proposed ATV trail. I am glad that happened. I imagine once you ground-truthed it with site specific information and looked at the previous NEPA you might have found it to be illegal. This is the problem with conditions based analysis as I stated in my previous comments, "I fear the implications of the conditions-based process. To lock us into 20 years of whatever the current ranger and supervisor feel is

best, flies in the face of science and common sense. (Dieterich DEA comments at 1)." As the silviculturalist at the virtual meeting said, "nothing is better than on the ground, site specific information." So why are we analyzing and planning a 20 year project without the best available science of on the ground, site specific information to inform the planning process?

Conditions based relies heavily on BMPs and design features that we have seen to not be followed by BNF in past projects. Please abandon this technique and do true, ground based, site specific work and focus on all measures to improve the watershed not just logging which is not scientifically proven to help much of anything than corporate pocket books. "We have been commercial logging for over 100 years and the forests are a mess. (Dieterich comments at 2). Or so we are told in project documentation.

Issue: Bull Trout

Nez Perce Fork and Rombo Creek are bull trout streams as is the Westfork of the Bitterroot. All are sediment impaired. Adding roads to an already heavily roaded system (the worst on the forest according to project documents) near bull trout streams is not advised. Even set thresholds will not be followed. The ECA thresholds are supposed to end logging, but the aquatics scientist thinks even if those thresholds are breached, BNF can come up with new, unanalyzed mitigations to keep the logs on trucks. The reasoning is that fires will be so much worse for fisheries. But the science does not support this argument. Fires enhance bull trout streams and tend to put pressures on non-native fish. FWP did an excellent report on the 2000 fires on the heavily logged Darby Lumber Lands property. Native fish thrived 3 years later and non-natives struggled. Seems fire is necessary. BNF should educate the public and let lightning starts burn. BNF should also have a no campfire policy when conditions are dry. This makes more sense than logging with tax payer funds. Spend that money hardening homes and protecting communities. Don't put firefighters at risk.

Issue: Grizzly bear connectivity zones

Grizzly bears will need the westfork as a connectivity zone from the Greater Yellowstone to the Bitterroot and beyond. Adding more roads is not the answer. BNF should adopt amendment 19 and start to decommission roads. Or for that matter, BNF should decommission roads it cannot maintain as specified in the forest plan.

Issue: Weeds

Weeds are already an issue in this heavily roaded and heavily logged area. This plan offers nothing in biocontrols, nor does it adequately address this issue. Rethink this logging project and create projects that directly address issues at hand that affect elk and wildlife.

Issue: Old Growth

There is absolutely no reason to log old growth forests. Please address the definition of old growth and its management in a programmatic forest wide amendment. Use an

independent scientific review to assess Green et al. It has not been peer reviewed, yet the BNF has been using it illegally for years and plans to continue unabated. "Old growth is much more than 8 old trees per acre" (Dieterich comments at 1).

Issue: Wildlife

Wildlife are not taken into consideration. "It leaves wildlife out of the picture" (Dieterich comments at 1). Thermal cover, hiding cover, EHE and old growth amendments hurt the wildlife BNF has been mandated to protect. These oft used and ubiquitous amendments must be considered in programmatic forest wide planning. Do not destroy habitat one project area at a time. Lynx habitat, fisher and wolverine are in the project area. If you do not agree with that statement, prove beyond a shadow of a doubt that they are not.

Do not rely on haphazard camera studies and heritage info. 40 acre clearcuts by whatever name are harmful to wildlife and fisheries. There should be more stringent criteria for approval of clearcuts. The amount of clearcuts vaguely described in this project is over the top.

It is time to think about the forest as forest not just trees. I would volunteer my time to do right by this forest. Please abandon this project and its many amendments and do the work on the ground. Let's protect our forests, the wildlife, our carbon stores as well as our communities.

Thanks for considering this objection. I would like to be a part of any objection resolution meeting.

Sincerely,

Michele Dieterich