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Comments: Thanks for holding the public meeting at Headwaters on the Green Union project proposal. The information was helpful, especially the maps. I have now downloaded the maps and studied them. Here are my comments. I'll keep them brief.

Generally, I have no objections to the whole of the project. Much of the District south of Hwy 26 is in dire need of thinning, not only from overgrowth but from changing climate conditions in the District. I remember the Lava Mountain Fire and the threat it posed not only to the Forest but to the town and people of Dubois, especially to those of us living west of town. The project needs to go forward. But a caveat: I have been riding my horses more in this area over the last four or five years as I want to get to know it better ecologically, and of course I want to keep track of motorized road use and road conditions in the area. Consequently, I have observed that there are certain specific problems with the project that need to be addressed.

COMMENT 1

As I stated at the public meeting, I am concerned that roads built or expanded to support this project will eventually turn into new ATV trails. I realize that you said the other night there is no relationship between this project and the Forest's Travel Management Plan (TMP) and its proposals for expanding loop roads for ATVs throughout the District. I also realize that your express intent is to close temporary roads that are used for the Green Union project

At the same time, specific proposed ATV loop routes using existing roads to which I objected are also to be used or expanded for the Green Union project. These routes are FSRs 961 (Windy Mountain), 961.1b (Grandy Reservoir), and 529 (Warm Spring Mountain and Canyon). We all know the irresponsible, irrepressible proclivity of ATV users to create new trails illegally and to ignore official road closures. Eventually, illegal trails become fait accompli legal trails.

One of the worst of these currently is the illegal ATV trail going down from FSR 528.2d to Warm Spring Creek to connect to FSR 529, which runs up the south slope and then across the north slope of Warm Spring Mountain to the private Porcupine subdivision on the northwest slope of the Mountain. Please refer to my comments to the Forest on the TMP EA dated 18 November 2021 for more detail regarding my objections to these routes as motorized routes.

Regarding Warm Spring Mountain, I recall that former District Ranger Rick Metzger attempted to negotiate a fire access easement to the Mountain through the Porcupine subdivision before he retired. The easement would have connected to the section of FSR 529 that goes to the old fire tower on the summit of the Mountain. This easement would have used an old two track that turns off the Union Pass Road across from the old Sawmill Resort and Lodge. Also, the turn off is up the road a bit from the Union Pass fire station. This would be an ideal access point for fighting a fire on the Mountain as well as for the Green Union project. I understand that most of the Porcupine landowners supported the easement, but two refused, and shortly afterwards, Metzger retired. So now there is no easement.

If the District is not now trying to get an easement through Porcupine to the Forest beyond, I strongly recommend that you re-engage the landowners and do all that is necessary to get the easement approved. Given its location, it would be the quickest and most efficient access point to the Mountain for any official purpose. Most importantly, a restricted easement would not be accessible to the public.

Of course, another option for fire or logging access to the Mountain would be to construct a road from the Union Pass Road up the west slope of the Mountain to connect to FSR 529. However, the west slope is public Forest land and ATV riders most certainly would use it even if closed. Also, the stretch of land between the west slope and the Union Pass Road is quite boggy. Such a road, when combined with the illegal trail off 528.2d mentioned above, would legitimize the ATV loop trail proposed in the TMP. I strongly object to this.

I have the same concern with thinning in the vicinity of Grandy Reservoir. FSR 961.1b coming off FSR 554 has historically been only a maintenance road for the Reservoir dam and has been otherwise closed to motorized use. When I came to Dubois in 1999, a gate was installed at the beginning of 961.1b. (As a matter of fact, this road off FSR 554 had no numerical designation in a 1990 Forest map. The 2014 Forest map indicates that a gate was present here, but it wasn't on the ground). That gate has long since disappeared, but I know of no explicit decision by the Forest to open that road to motorized use. FSR 961.1b is proposed in the TMP for ATV use.

FSR 961.1b between the Reservoir and its junction with FSR 961, the Windy Mountain Road--which itself is closed with a gate to motorized traffic, other than traffic to maintain the communications towers on Windy--is little more than an old Tie Hack logging track, long unmaintained. It is extensively used by hikers and equestrians. It has been kept closed informally to ATVs by hikers and equestrians, using deadfall to block vehicles' passage. The TMP has also proposed opening this section to ATV traffic.

FSR 961, currently closed to public motorized traffic, has also been proposed as an ATV trail to Salt Barrel Park and MT 14 on the boundary of the Fitzpatrick Wilderness to complete a loop road to Union Pass Road.

Consequently, please ensure during planning and execution that all roads used for the Green Union project that are not now open to motorized traffic remain closed once the project is completed. A good example is the closure of temporary roads used in the recent Upper Wildcat Loop timber project. One can barely get a horse through there, much less an ATV.

COMMENT 2

In the Windy/Bald Mountain area served by FSRs 961 and 554 all the way west to the Union Pass Road, as well in the Sheridan Creek and Trout Creek areas, water tables are high and many areas in which timber units are designated are quite boggy spring, summer and fall. Design features for treatments will have to take this problem into account--probably, limiting work to winters.

COMMENT 3

Regarding roads currently used for motorized traffic and included in the project area, please note in the purpose and need statement the intent to improve the maintenance of these roads, for example, FSR 554 between the Lower Wildcat Loop parking lot and the Union Pass Road. This road is a real tooth rattler.

COMMENT 4

I was intrigued by the reference in the project documents to beaver analogue dams. Please note in the decision document for this project where and when these dams will be installed.

COMMENT 5

Despite the often heavy motorized traffic on the roads of the District, many areas in the project area are still sensitive for wildlife, particularly moose, elk, deer, mountain lions, wolves, grizzly bears, raptors (especially eagles, peregrines, goshawks), and waterfowl. Care must be taken to limit any disturbance of their habitats, especially during birthing and breeding periods.

In closing, I generally support the project to lessen the risk of wildfires in the District. However, I do want to emphasize my concern that despite the Forest's stated intent, temporary logging roads will become permanent ATV trails/roads unless the Forest goes to great lengths to prevent it.