



Friends of the Clearwater

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May 20, 2022

Sent via email to comments-northern-bitterroot-stevensville@usda.gov and also to matthew.anderson3@usda.gov and steve.brown2@usda.gov

Matthew Anderson, Forest Supervisor
Bitterroot National Forest

Steve Brown, District Ranger
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Mr. Anderson and Mr. Brown:

These are comments on the Forest Service's April 20, 2022 letter describing proposed management planning and activities for the "Bitterroot Front Project" on behalf of Friends of the Clearwater, Alliance for the Wild Rockies, and Wilderness Watch. Within these comments we also incorporate the comment letter from Alliance for the Rockies et al. dated May 8, 2022, and the comments of Friends of the Bitterroot et al. transmitted to you this week.

The proposal indicates the Forest Service (FS) wants to break commitments they made to the public thirty-five years ago when the Forest Plan was adopted—commitments to protect old-growth forests, wildlife habitat components such as large snags, and elk habitat security. Please include an alternative **for full analysis** that is fully consistent with all current Forest Plan Standards including those for old growth, snags and large woody debris, and big game security. Was the FS merely deceiving the public when it adopted the Forest Plan back in 1987 as a great way of managing the BNF?

The proposal is introduced in a letter that states, "Your input will help us identify potential issues and concerns that should be analyzed in the environmental assessment (EA) for this project." This comes off as disingenuous given that Table 3 of your proposal displays down to the acre how much forest the agency targets for "restoration" using logging. If the agency was really interested in understanding public concerns and issues to correctly set the "scope of how this area should be managed" you would have already incorporated the issues our groups have expressed repeatedly, e.g., in the context of the Mud Creek, Gold Butterfly, Darby Lumber Lands, Burned Area Recovery, Middle East Fork and other timber sale projects. Since the FS is using identical or very similarly worded rationale for this project as it did for those, meaning it's easy for the FS to anticipate our concerns regarding the Bitterroot Front proposal, the FS already should have incorporated the concerns expressed about those other projects in the present context. The wording of this Proposal pretends the FS hasn't a clue of those concerns and

ignores the scientific controversies we've repeatedly pointed out in great detail.

The proposal states: "(Arno 1976) found an average fire-free interval of 11 to 16 years in ponderosa pine and Douglas-fir dominated sites and 16 to 27 years in Douglas-fir/lodgepole pine-dominated sites during the period of 1734 to 1889." It is alarming that the FS is apparently trying to replicate forest conditions onto 144,000 acres based on fire regimes as represented in a 45-year old study that did not undergo independent peer review, with an extremely limited geographic focus, and from a time when climate conditions and trends were much different than the present. The previous comments mentioned above clearly raised identical issues and concerns to this agency; your continuing to ignore them indicates a lack of regard for public input and best available science. The scope of this proposal is the thing that's out of whack—not the forests of the Bitterroot Front.

It seems rather suspicious that the proposal indicates the FS apparently has yet to set foot in and assess the condition of the forest stands it is targeting for logging, yet has already decided there are too many trees.

NEPA requires that high-quality information be made available to the public and that NEPA documents concentrate on issues truly significant to the action in question. One highly significant issue is cumulative effects, including fostering understanding of how past management actions—especially those implemented under the Forest Plan—might have led to the current conditions.

It is vital that the NEPA document analyze and disclose the results of past monitoring be incorporated into project analysis and planning. The following must be disclosed:

- A list of all past projects (completed or ongoing) implemented in the analysis area.
- A list of the monitoring commitments made in the previous NEPA documents covering those past projects implemented in analysis area.
- The results of that monitoring.
- A description of any monitoring, specified in those past project NEPA documents for the analysis area, which has yet to be gathered and/or reported.
- A summary of all monitoring of resources and conditions relevant to the proposal or analysis area as a part of the Forest Plan monitoring and evaluation effort.
- A cumulative effects analysis that includes the results from the monitoring required by the Forest Plan.

The NEPA document must analyze and disclose how well those past FS projects met the goals, objectives, desired conditions, etc. stated in their corresponding NEPA documents, and how well the projects conformed to forest plan direction. The NEPA document must also analyze and disclose how well the statements of Purpose and Need in those NEPA documents were served. Such an analysis is critical for validating this current proposal. If the predictions made in previous NEPA processes were wrong there is little hope this present proposal will lead to success. And if prior logging, prescribed fire and other "forest resilience" management actions have not been fully monitored, the FS cannot properly support this Bitterroot Front proposal.

Up to 13,000 acres (over 20 square miles) of logging is proposed inside Inventoried Roadless

Areas (IRAs), bringing industrial disturbance up to the boundary of the Selway-Bitterroot Wilderness, and degrading roadless characteristics making roadless areas less likely to be recommended for wilderness protection when the BNF Forest Plan is revised in the next few years.

Because a significant amount of the project area abuts the Selway-Bitterroot Wilderness, the FS must analyze and disclose how the project will affect the area's wilderness character, both in the short- and long-term.

The FS should have already examined the scientific evidence we've repeatedly provided to you (your own from ICBEMP analyses and Roadless Rule NEPA, plus that from independent peer-reviewed sources) which contrasts the ecological integrity of unmanaged, roadless and wilderness areas with the highly degraded conditions found in areas you've managed, and concluded an alternative that refrains from actively managing IRAs must be included for full and objective analysis in the Bitterroot Front NEPA document.

The FS implicitly rejects an alternative that uses natural fire as a way to achieve its "desired conditions" which is extremely irrational. The forests of the Bitterroot Front have responded and adapted to changes in climate, those induced by fires, etc. for untold centuries and this led to abundant wildlife, healthy fish populations, clean water, remarkable old-growth forest conditions—but now the FS believes this ecosystem is so dysfunctional it cannot self-correct following a few decades of "fire exclusion"?

The NEPA document must analyze and disclose how recent fires in the project area (e.g., Lolo Peak) and elsewhere on the BNF might have created ecological conditions that approach or resemble the "desired conditions" your proposal alleges or implies can only be achieved by heavy industrial management manipulation.

We also request an alternative be fully analyzed which brings the road system down to the level that conforms to your regulatory definition of the minimum level needed and affordable under projected budgets, and see how the wildlife, fish, and forest stands respond in the coming decades.

As is standard operating procedure for the FS, you pretend timber production isn't driving this proposal, instead blame the forest for "departure from natural disturbance patterns" and "departure from historic fire regimes (which) has created forest stands characterized by high stem densities, hazardous fuels buildup, stressed tree conditions ... with high susceptibility to uncharacteristic fire behavior and ... at high risk to future insect outbreaks." Your proposal doesn't really say why the alleged 144,000 acres of forest malady exists or who's responsible, even though the FS has supposedly been in charge for over a century.

Please analyze and disclose both the population trends of all Management Indicator Species on the Forest and project area, and the trends in their corresponding habitat conditions forestwide and in the project area from 1987 to the present. Please do the same with ESA-listed and Sensitive species.

The NEPA document must fully analyze and disclose how climate change has affected the analysis area, and how it will affect the area under likely climate change scenarios under a reasonable range of management alternatives for the remainder of the 21st Century.

The NEPA document must also consider how likely the proposal's **desired conditions for vegetation** can be achieved under likely climate change scenarios for the remainder of the 21st Century.

Current peer-reviewed science, which we have brought to the FS's attention in the context of several recent NEPA processes for timber sales, identifies the extremely valuable contribution natural, non-degraded forests provide for sequestering carbon and mitigating climate change. Why is the FS ignoring the potential of the BNF for provision of natural climate solutions?

The proposal says our comments "...will be reviewed for additional information to include in the purpose and need or proposed action, considerations of alternative means to achieve the project's purpose and need, and additional project-relevant information to include as we finalize the proposed action and begin the environmental analysis process." This seems to indicate you are open to suggestions for other alternatives—and even changes to the purpose and need. However regarding the latter, your purpose and need is already heavily skewed toward logging as a solution to what we believe is a fictitious problem, so we won't be helping you devise alternative ways of plundering "the resource." Further, if you were genuinely interested in entertaining alternatives, you wouldn't be already far down a road that will use an EA to analyze only one alternative in detail and that already concludes the proposed massive industrial manipulation will have no significant impacts.

In conclusion, we note the FS is proposing to manage over 17% of the non-Wilderness portion of the BNF in a manner not anticipated in the Forest Plan EIS, using an EA process that pre-supposes no significant impacts, and sidesteps site-specific NEPA with a controversial and likely illegal conditions-based analysis. We urge you to completely drop this extremely bad idea, or at least prepare a full Environmental Impact Statement so you may become properly informed as managers and decisionmakers.

Sincerely submitted,



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