## COMMERCIAL LOGGING UNDER THE GUISE OF WILDFIRE EMERGENCY

The Bitterroot National Forest recently announced a "new technique" for fighting fires, used in response to the 2022 Blodgett and Mill Creek fires burning in the Selway-Bitterroot Wilderness, miles from structures. The following is a report on this "new technique" which appears to allow commercial logging without environmental review by calling the logging a fuel break.

## **Project History**

On September 9<sup>th</sup>, despite Inciweb still stating "no structures or infrastructure are threatened", BNF began constructing a fire line with a large commercial logging component along parts of the forest boundary at the west edge of the Bitterroot Valley. It was supposedly meant to "protect private property" from the Mill Lake and Blodgett fires, which were burning 6-8 miles away inside the Selway-Bitterroot Wilderness. Although there was some fire growth with the strong winds on September 12<sup>th</sup>, BNF later reported on Inciweb that Sept 12<sup>th</sup> was the last day there was any movement to the east toward private property, still more than 6 miles away. By September 14<sup>th</sup>, when we first learned of this project, cool, wet weather had moved in and was predicted to continue into late September. BNF also reported on Inciweb Sept 14 that neither fire was moving, nor projected to move, east towards this fire line 6 miles away (and it never did). Interestingly, on September 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, and 9th, when the weather was still warm and dry, they had stated "No structures or infrastructure are currently threatened". No pre-evacuation "get ready" orders were ever issued to the nearby residents. From Sept 13<sup>th</sup> on, Inciweb reported only minimal fire growth, with "no growth to the east" and only "creeping and smoldering behavior". During this time, BNF dropped the fire danger from extreme to high and then to moderate. Nonetheless, on September 9, they began work on what they later termed a "shaded fuel break", logging mature Douglas fir and ponderosa pine and piling them in huge log decks. According to BNF Inciweb posts, "shaded fuel breaks are mechanically created buffer zones that remove shade tolerant brush, but mature trees that are more fire resistant are left standing". But, according to the definition, this was no shaded fuel break. See the Inciweb summary at the end of this report for more. The work was not suspended when the weather turned cooler and wetter (Sept 13), and essentially stopped all fire growth for the rest of the season.

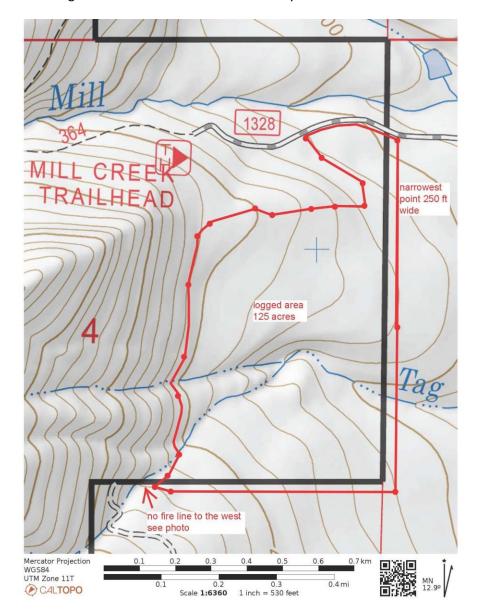
## **Project investigation**

We visited the Mill Creek logging project on 10-1-2022, mapping the perimeter of the logged area (the "shaded fuel break") using Gaia GPS and Caltopo to generate the map below. The logging covered about 125 acres (Caltopo calculation), mostly in a rectangle 2,500 feet long by 1,900 feet wide, a very strange shape for a fire line or shaded fuel break. And there had been no work done to continue a line along the forest boundary beyond the SW corner of the logging toward Blodgett Canyon (see map). Thin strips of riparian vegetation around Tag Alder Creek (not flowing) were left alone, and a buffer was left on the hill south of the Mill Creek trailhead, presumably to screen the logging from the road and trailhead (see the map for details).

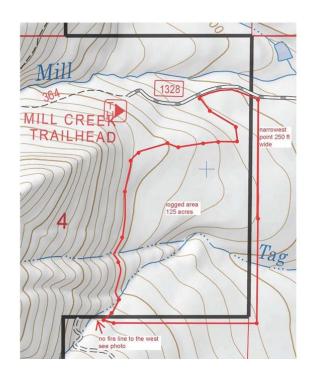
The area resembles the commercial harvest units on the 2017 Westside project. Almost all the Douglas firs were cut, many from 100-135 years old and larger than 24" diameter at the stump. Large ponderosa pines were cut too, but their retention appeared to be favored over Doug fir. A large amount of slash still covered the ground more than three weeks after this fire line was determined necessary. A masticator was grinding up all smaller non-commercial trees. Logs were being moved to a large log deck at the Mill Creek trailhead, then loaded on logging trucks to be stored on county land on lower Dutch Hill Road (see pictures below). Neither the Mill Lake nor Blodgett fire has had any significant growth since mid-September. As of Oct 18th, the Mill Creek trailhead

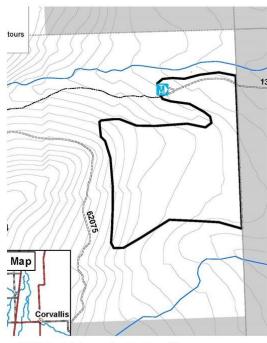
was still closed to the public due to ongoing "clean-up" according to the guards at the gate. On the following pages are maps followed by photos.

It is clear that the actions described are nothing more than commercial logging without environmental review. The Forest Service is no longer trying to justify this lawless logging with something that looks like a fireline or only using it when fires are in close proximity to private structures. This new technique will allow the Forest Service to log without environmental review every fire season.



Red line is perimeter of commercial logging ("shaded fuel break"). Black line is BNF boundary. About 125 acres were logged. The large rectangular area measures 1,900 x 2,500 feet. Note that the forest boundary on the map does not exactly coincide with the GPS points, typical of topo maps.





Mill Creek Vegetation Project Map

The above maps compare the Mill Creek Vegetation Project proposed in 2014 with the current logging project. Mill Creek project was scoped in 2014 but then dropped because extraordinary circumstances, a long-term climate study site, were shown to exist. The project proposed 75 acres of commercial logging, which was accomplished (and then some) with the current activity. BNF has clearly been after these logs for a long time.

The logging not only accomplished the previously cancelled 2014 logging project, but also an unknown amount of the proposed Bitterroot Front project, which has not yet gone through the NEPA process and is not approved. The area is part of the Tamarack Opportunity Area of the Bitterroot Front project, where 215 acres of commercial logging was proposed outside the IRA.