Middle East Fork Project
Summary of Objection Issues and Suggested Remedies

Project Name: Middle East Fork Hazardous Fuels Reduction Project
Objector: Patrick O. Connell, CF
Objection Number: 0001

Issue 1. (HARVEST) INFISH stream buffers were too wide.

Suggested remedy: Delicate, targeted removal of excessive dead Douglas-fir volumes within the RHCA where needed could reduce the rate of (fire) spread, and substantially lessen the likelihood of severe fire within the RHCA. See remedy under Issue 5.

Regional Review and Response: Please refer to Public Concern Statements #3333, #31528, and #3339. In summary, harvesting timber from the Riparian Habitat Conservation Area (RHCA) would require a Forest Plan amendment because the activity would not comply with INFISH standards TM-1a or TM-1b. The specific reasons that RHCA harvest would not comply with these standards is described in Public Concern Statement #3333 in the Final Environmental Impact Statement (FEIS), Volume 2, Appendix H, (see the bottom of p. 22 of 193). Also, intact INFISH buffers are useful for filtering out potential sediment contributions from adjacent roads or harvest units, and help maintain the channel stability of tributaries to the East Fork of the Bitterroot River, a stream listed as impaired on the 303d list.

Issue 2. (PROCESS) Selection of "Alternative 3" for analysis rather than the proposal submitted by Craig Thomas. Alternative 3 does not meet ESA mandates or the purpose and need for this project.

Suggested remedy: See remedy under Issue 5.

Regional Review and Response: The Region understands and respects that the objector does not agree with the Forest Supervisor's decision to analyze Alternative 3 and not the Alternative submitted by Craig Thomas. The reasons for this decision are explained on pages 2-3, 2-4, 2-5, 2-6, and 2-56 of the FEIS. The Forest Supervisor determined that by analyzing the Proposed Action, Mr. Thomas' alternative would essentially be analyzed. Alternative 3 was analyzed because it provided the decision maker with a contrast in approaches to meeting the purpose and need – and in fact, it does show a significant difference in meeting the purpose and need based on the objective measurement criteria as summarized on pages 2-32, 2-33 and 2-34. This is also addressed in the response to Public Concern 10002 (Volume 2, Appendix H, p. 78 of 193) and Public Concern 10016 (p. 86 of 193).

Issue 3. (OTHER) Object to the conclusion that Air Quality is not impacted beyond local communities under Alternative 1 or 3.

Suggested remedy: See remedy under Issue 5.

Regional Review and Response: As stated in the Final Environmental Impact Statement (FEIS) there would be no increase in management created smoke under Alternative 1 (No Action); there does exist potential for increased smoke impact to both the local community and beyond due to smoke created by wildfire in areas of untreated fuels. Wildfire produced smoke tends to be more concentrated and can last much longer than that of prescribed fire. Alternative 3 treats less acreage and less tonnage of fuels by prescribed fire than Alternative 2; therefore, there would be less impact to local communities by management of created smoke. However, the potential for impact by wildfire smoke from untreated fuels exist similar to the Alternative 1 scenario.

Issue 4. (SOIL) Object to the conclusion that there would be no alteration of current erosion or debris flows under Alternative 1.

Suggested remedy: See remedy under Issue 5.

Regional Review and Response: On page 3.5-13 of the FEIS, it states that the no action alternative would not alter the current soil erosion and mass wasting regimes. It goes on to say that fires will likely continue to affect the project area and discusses possible erosion or debris flows with different fire scenarios.

Issue 5. (WILDLIFE) Object to the statement that under Alternative 1 and Alternative 3 that there would be no significant effect on elk populations or viability. In the short run significant mortality would occur.

Suggested remedy: Alternative 2 is best for the area and resource. The scope and implementation of that alternative could be expanded much further, justified, and explained by the objections raised here.

Regional Review and Response: The Region disagrees with the objector's conclusion that the Forest underestimated the effects on elk population and viability in Alternatives 1 and 3. The objector expressed concern about direct mortality from fires. Based on the Forest's experience from the 2000 fire season to date, elk populations and viability have steadily increased. The 2000 fire event on the Bitterroot National Forest occurred on 307,000 acres of National Forest land and 49,000 additional acres burned on State and private land. Although individual animals were killed as a result of the fires, big game losses were minimal. Reports of herds killed by the fires were investigated by Montana Fish, Wildlife, and Parks Biologists, as well as Forest Service Biologists and were found to be untrue. Reports turned up a few individual animals: a lone cow elk in a drainage at the upper end of Laird Creek on the road to Bear Creek saddle who died due to super heated gases inhaled; a bull moose and buck mule deer near the creek crossing in little blue joint on Road 5658 who also died due to super heated gases inhaled; and a couple of individual animals in the Rye Creek area. Ungulates were observed moving away from active fire areas but showed very little sign of uneasiness or excitability, as they remained foraging adjacent to the fire areas while moving slowly. The real vulnerability to elk is the amount of open road density during the general big game hunting season, which is addressed in the analysis.

The intention of the standards for thermal cover, security, and habitat effectiveness are to ensure elk viability. The most recent elk surveys reveal a new record total number of 3,499 elk in Hunting District 270. This number is a new high over the previous record of 3,050 elk in 2003 as referenced in the Draft Environmental Impact Statement (DEIS). This information is in the FEIS in Section 3.6.5 D. This means that Hunting District 270 is 17 percent over the management goal for the area according to Montana Fish, Wildlife, and Parks. A new record number of 8,169 elk were observed in the Bitterroot Valley, 446 more than the previous record of 7,723 in 2003. Treatments occurring in elk habitat are referenced in the wildlife section 3.6.5 D. This record number of elk is despite the fact that elk habitat effectiveness (EHE) is currently not met in two of the third-order drainages within the project area. Both action alternatives propose to seasonally gate roads in these drainages to meet EHE. Thermal cover would be reduced on 135 acres in 4 units, in Alternative 2. This area is already below standards on the north side of the Bitterroot River, and cover is continuing to be reduced with mortality of large Douglas-fir due to the bark beetle. Security is met on both sides of the Bitterroot River in both herd units. None of the activities in Alternative 2 or 3 would alter landscapes beyond the range of natural variation so none of the activities will substantially interrupt current elk movement, dispersal or migration patterns (see Section 3.6.5 R). Elk have adapted to use many assemblages of habitats given the situations they encounter as habitats change and none of the prescriptions would have an impact on elk viability.