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First name: Mac  
Last name: Donofrio  
Organization:  
Title:  
Comments:  
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West Fork District Office

6735 West Fork Road

Darby, MT

59829

Scoping comment for the proposed Piquett Creek Project, on Bitterroot NF West Fork District

Thank you for the opportunity to comment.

1. Again, to be frank, I think the BNF needs to quickly ramp down your timber target, not try to attain the present unachievable harvest quota dreamed up by politicians who probably know little about forests. Many specialists in the FS have agreed the quota has been set far too high, yet the USFS seems hell bent to push on with trying to feed the insatiable beasts, regardless of the innumerable disastrous social and ecological consequences, not to mention the incredible cost to taxpayers.
2. This project needs to have more environmental analysis, at least an EA completed, if you care about nature.
3. The new BNF format to comment on projects makes it a full time job to stay abreast of the Piquett Cr project and the next two huge proposed projects: Mud Creek and Bitterroot Face/ Front. Maybe that is your intention? Please return to the old comment/planning protocol.
4. The public needs maps showing roads, drainages, unit boundaries with a key of what is proposed for the various units early in the comment process.
5. The "wildland/urban interface" that you mapped out is absurdly wide. This seems like an attempt to come up with a new reason to log more acres. There is nothing urban about the West Fork of the Bitterroot, or any part of your project area. Fire science does not support logging that far away from structures. In this case of Piquett Creek the phrase/anacronym "WUI" falls into the same category of

propaganda speak as your medical terminology used to talk about virtually all logging projects.

I wish you would use the language in a more honest way.

6. I ask that you change the boundaries of the project to stay within 1/4 mile of the private land boundary and stay out of unroaded areas (some of the best habitat left).

7. The historical fire map is interesting, but I doubt if the real extent of the older fires is portrayed here, making them look smaller than they actually were. The more recent fires perimeters are mapped more accurately, and with recent memory, including the areas of low intensity fire. Seems like comparing apples and oranges.

8. Road densities are very high. There is roughly 64 miles of roads showing on your scoping map within the 9 square mile project area. There may be twice that many or more once (or if) all the old grown-in roads are rediscovered. Some sections may have up to 15 miles of road.

9. No new ATV, motorized, or bike trails. These are not compatible with elk, mule deer, blue and spruce grouse etc. There's plenty of places to ride.

10. Reduce open road densities, not just for elk and other species mentioned above, but for over 100 other "popular" animal species, as well as snag retention.

11. Apparently logging has been found to emit more CO<sub>2</sub> than forest fires. The project needs to address climate change and CO<sub>2</sub> emissions. Another reason why an EA or EIS is needed. I would like to see the project not focused on tree cutting. Reduce the number and size of trees to be cut. And do not cut any ponderosa, Douglas fir, subalpine fir, or spruce, over 12" dbh. Would like to see no lodgepole cut over 6" at lower elevations, and no trees cut at higher elevations.

12. Roaded portion of project has high percentage of compacted soils. The project area needs less compaction, not more, and much more will occur if this sale is anything like the past sales.

13. I oppose any new road construction or opening up of any roads that are already recovering/growing back in.

14. Are there any terraced areas in this project?

15. Please, no more clearcutting, any tree species, anytime. It appears that you are planning more clearcutting. See comment #23.

16. I oppose commercial thinning of any old-growth stands, near old-growth stands, pockets or groves of old-growth or near old-growth, regardless of tree species, level of insects, fungal decay, mistletoe, or

other perceived threat to the "health" of the stand.

17. I oppose any entry/active management in IRAs, WSA, and formerly unlogged or unroaded acres.

18. I support the checking and replacing of culverts where needed under the roads that remain open, and the removal of culverts and stream slope rehab on the riparian sections of road to be closed.

19. I support the true reduction in miles of road in the project area.

20. I oppose "aspen release" except as it occurs from wildfire. Stream buffers should be upheld, no "aspen release" creek buffer exceptions as happened in Lost Horse.

21. Current logging practices on the BNF are creating massive weed spread, soil compaction, reduction in fungi diversity, and increased time windows and acreage for fire ignition sites.

22. As your records should indicate a bald eagle territory and nest/nests are within this Piquett Cr. project area. Care must be taken to not damage or destroy their nest trees or alternate nest trees, winter roost trees or other roost trees, as well as leaving the mature trees for future nest sites. Buffers both visual and otherwise should also be kept intact.

23. Please explain what you mean by "Within project watersheds, harvest would leave a residual stand and limit the increase in ECA (equivalent clearcut area) to 25%."

24. More sale administrator monitoring hours are needed on active project sites.

Thank you for your attention.

Mac Donofrio