

The following are my comments on the EA for the proposed Big Creek Hazardous Fuels Reduction Project in accordance with 36 CFR 218 Subparts A and C.

More consideration should be given to the beneficial effects of road maintenance and improvements necessary to carry out the project. "The Profile Gap Road 340 is the main access route between the communities of Edwardsburg-Big Creek, Yellow Pine and the Warm Lake Highway, and serves as the main evacuation route. The Elk Summit road to the west of Edwardsburg would serve as the only alternate escape route, unless fire compromises that route. Many of the forest roads in the area were originally built to access mining claims or other remote sites and tend to be very steep, rocky, and winding. In the event of a wildfire that involves the understory and overstory vegetation and fuel loads that currently exist along these roads, they would be unsafe to impassable." page 6 of the EA. Underbrush and vegetation has been allowed to grow along the side of the roads making safe passage difficult in many places by creating blind corners and narrowing road. In addition lack of maintenance has allowed pullouts to become unusable. In short, there are many stretches of the road that do not allow 2 vehicles to pass comfortably. While several projects have been recently finished that have improved the road system, such as bridges and culvert replacement, more needs to be completed. With the continued help and support of all interested parties including Nez Perce Tribe and Valley County, improvements can be made that will benefit natural resources and increase safety during the project and into the future. Without safe access, resources can be decimated by intense fires leaving no hope of restoration, or effective management.

No action option does not address the negative impacts of future fires. The purpose and need for the project is to reduce fuel loads. "If the existing fuel conditions are left untreated, fire suppression may be less successful and more costly, expose firefighters to hazardous conditions, and potentially cause resource damage. In summary - if a high intensity wildfire approaches the project area from the surrounding National Forest System lands and it is uncontrollable, it will impact private property and Forest Service administrative sites." page 3 of EA. The effects of future fire on natural resources should warrant some consideration. What are the results of sediment modeling for impacts from a moderate or high intensity fire if no action is taken?

The EA does not address effects to other activities or current projects in the project area. On page 81, there is one sentence that details these: "On Federal and private land ongoing actions include one guest outfitter lodge, private summer residences, historical and present mining activities, water diversions, hydropower sites, a busy public backcountry airstrip, grazing by livestock on private land and by pack and saddle stock throughout localized areas, and a Forest Service guard station." While much time and effort is spent counting stream fords and the number of times vehicles and equipment will drive up and down the road to determine sedimentation, no consideration is given to the impact on some of these activities and cultural resources. The safety and viability of these activities, including other ongoing resource management projects Forest Service, Nez Perce Tribe and private landowners are engaged in, should be considered. On page 74, the EA mentions the project area includes a source of public drinking water for the Big Creek Camp Ground and Guard Station. On page 78, the EA addresses basic concerns for water quality for Big Creek Camp Ground and Guard Station. There is no mention or acknowledgment of other water sources in the project area. We can only hope that other water sources will be afforded the same consideration in the development of the detailed plan for prescribed burns.

Much of the designated Rx burn area on Logan Mt and the Hogback have lower fuel density than most of the surrounding forest as can be seen from the aerial picture on the cover of the EA. Is the purpose to burn those areas just to bring the overall average density of the project area down? It is unclear from the data as presented in the EA if the prescribed burns will lower the fuel density in areas that are high,

or just affect the overall average of the project area to statistically reduce the fuel load. The project maps do not identify high fuel load areas vs areas that have desirable fuel loads. In general, the lack of detailed planning for prescribed burns makes it impossible to evaluate the effectiveness and potential effects. It can be said "the devil is in the details" which is a major concern for us private property owners. Prescribed burning can have disastrous effects if adequate control features are not in place and environmental conditions are not just right. We have brought these concerns up in the scoping comments and during the meetings on September 2, 2018 and again in September 28, 2019. These concerns have not been addressed in the EA and it gives the impression that not all comments and concerns are afforded consideration.

Overall, I am supportive of the Big Creek Hazardous Fuels Reduction Project. I feel the benefits far outweigh the negative impacts of implementation and the alternative of no action. I request the planning process of the prescribed burns to be collaborative and well communicated.

A handwritten signature in cursive script, followed by the date "1/3/2020" written in a similar cursive style.

Miri Gillihan