Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT 59804

February 12, 2021

Submitted electronically to: appeals-northern-regional-office@usda.gov

Re: Objection to Sawmill-Petty Project Draft Decision and Finding of No Significant Impact

Dear Objection Reviewing Officer,

In concordance with 36 C.F.R. § 218.8(d), I hereby object to the U.S. Forest Service's Draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the 2020 Sawmill-Petty Project Environmental Assessment, Ninemile Ranger District, Lolo National Forest. I have worked to develop and submit comments for both the October 2019 Proposed Action and the October 2020 Draft Environmental Assessment for this project. My objections contained herein are based on points and deficiencies I raised in these earlier documents and am incorporating by reference (Documents A and B).

I understand that the responsible official is Lolo National Forest Supervisor, Carolyn Upton. As required by 36 C.F.R. § 218.8(d):

The lead objector and main contact for this objection is:

Claudia Narcisco

CLAUDIA NARCISCO

[redacted]

Failure to adequately address or respond to comments in a meaningful way.

I do appreciate that the Ninemile District Ranger Eric Tomasik took the extra effort to contact me directly regarding my October 4, 2020 comments, and that the Forest Service made some minor adjustments in the proposed action as stated in the DN pg 1 "My decision will not implement some of the activities that were described in the EA, including dropping construction of approximately 3.6 miles of permanent road (PS-1) and some of the treatment units that were associated with it (S36, S39, S41, S42, S43, S49, and part of S50; total approximately 201 acres) and deferring treatment on portions of three units (J17, J20, and S57) based on further field verification of lynx habitat modeling results."

However, the forest service has not adequately addressed or responded to a number of my comments in a meaningful way, in violation of NEPA's implementing regulations. 40 C.F.R. § 1503.4 [requiring an agency to "assess and consider comments" and "respond by one or more of the means listed below" including (1) modifying alternatives, (2) developing and articulating new alternatives, (3) supplementing, improving, or modifying its analysis, (4) making factual corrections, or (5) explaining why the comments do not warrant further agency response].

The following concerns were raised in my earlier comments and are repeated here as they relate to the Forest Service's failure to respond.

1. **Failure to adequately address my concerns that the Sawmill Petty Project impedes connectivity and grizzly bear recovery.**

Connectivity was identified as a key indicator for assessing effects to grizzly bears in the Amendment of the Helena, Lewis and Clark, Lolo and Kootenai National Forest Plans to Incorporate Relevant Direction from the [Draft] Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy (NCDE Four Forest Grizzly Amendment). Table 183 (V3, pg 36) specifies connectivity – female grizzly bear occupancy and population connectivity to the Cabinet-Yaak and Bitterroot recovery zones, with a measure of a "change in permeability (linear road miles or road density) and mortality risk in DCAs." Sawmill Petty is a likely portal to the Bitterroot ecosystem given its proximity to and extension of the Ninemile Demographic Connectivity Area (DCA). Table 183 also identifies connectivity-genetic interchange with the Greater Yellowstone Ecosystem as a key indicator with a measure for plan components to provide for movement of male bears, focusing on land ownership consolidation or conservation easements and road density."

There has been robust investment in conservation easements in the Ninemile DCA, and certainly the intent of such investment is to facilitate quality wildlife and fisheries habitat. It is logical that Sawmill Petty project formally or informally adopts the provisions established for the DCA in order to facilitate grizzly bear recovery. It does neither. In fact, on page 3 of the DN, number 2, it is stated, "After further *discussions* (emphasis added) with USFWS, the effects determination for grizzly bear in the Biological Assessment (BA) will be NLAA. The determination shown in the original report was LAA. *The NLAA determination is based on the absence of resident female bears in the action area (or evidence of even transient bears at this point), so direct effects of the project are only anticipated to potential transient bears* (emphasis added). The analysis and determination in the updated report reflects the analysis and determination in the BA."

This change fails to address my concerns. After the time, energy, and knowledge that publics like myself invest in commenting, it is a slap in the face that unknown '*discussions',* outside the purview of public knowledge and/or opportunity to review displace an earlier determination. The absence of a resident female grizzly is very temporary, likely less than the 15 years projected in the wildlife report and EA.

In my October 2020 comments, I pointed out that grizzly bear dispersal is happening and quicker than anticipated. There have been a number of sightings in recent years and it is not unlikely that female bears will be establishing home ranges in the Sawmill-Petty area sooner than the 10-15 years projected in the EA (pg. 96), **if management activities do not thwart expansion** (emphasis added). The EA states, "*Quality and quantity of habitat for grizzly bears in the project area is considered moderate. There are habitats useful to bears in spring, summer, and fall. Much of the project area has road densities considered less suitable for grizzly bear occupancy, however a majority of the roads have yearlong closures. Proximity to I-90 and potential for increased development and traffic patterns radiating from Missoula may degrade potential grizzly bear habitat over time. Lands outside of the lower elevation and high human use areas can offer acceptable habitat to support grizzly bears while the adjacent Petty Creek Inventoried Roadless Area offers more security. No linkage zones across the I-90 corridor are adjacent to the project area* (Servheen, Waller and Sandstrom 2003a)." If road densities are the main condition that effects suitable habitat, constructing 28 miles of new road is the wrong decision.

Things have changed since 2003. Several groups and agencies have made considerable investments in the Ninemile area to maintain and improve connectivity. Vital Ground Foundation and Yellowstone to Yukon Conservation Initiative (Y2Y) purchased 52 acres along Ninemile Creek along the Clark Fork to promote linkage and there have been grizzly bear sightings in that area. There are also numerous

conservation easements in the area, consistent with the desired conditions and guidelines of the Four Forest Grizzly Amendment. "*USFS: Efforts to consolidate public lands, conservation easements with willing landowners, and other efforts to improve provide habitat connectivity and facilitate the movement of wildlife are encouraged. There will be no net increase in the linear miles or density of roads that are open for public motorized use during the non-denning season in Zone 1*." Sawmill Petty lies between NCDE and Bitterroot ecosystems but is not in either. The Ninemile DCA, is a Zone 1 and as a DCA is the most restrictive outside primary core. However, unlike most Zone 1 areas, this has a hard edge, from Zone 1 to outside the NCDE. Most Zone 1 areas have a transition to Zone 2, or Zone 3 that are a gradient in how the areas are managed.

Connectivity was a key factor in Judge Christensen's ruling[1] pertaining to the Greater Yellowstone grizzly bear delisting and upheld by the Ninth Circuit, that the U.S. Fish & Wildlife Service must ensure connectivity between isolated grizzly bear subpopulations. The Bitterroot Ecosystem is currently considered unoccupied and the Cabinet Yaak is failing to meet population objectives. The NCDE is the source of grizzly bear to these other recovery areas. The Ninemile DCA and by extension Petty Creek and other drainages in proximity are critical to grizzly bear recovery throughout the region. The American taxpayer has invested tens of millions in grizzly bear recovery. The change in the Decision from "likely adversely affect grizzly bear (LAA) to "may, but not likely to adversely affect (NLAA) ", does not adequately address or respond to my concern.

In my scoping comments, I requested that, "Providing for linkage habitat must be included as an objective in the proposal and purpose and need. Demographic connectivity requires female grizzlies to be able to live in an area connecting two ecosystems on a regular basis. I urged you to do everything necessary in the Sawmill-Petty project so as to avoid the determination of 'likely to adversely affect' grizzly bear, as was the case in Soldier Butler." My request at that time did not include 'discussions' outside the purview and opportunity for public review and to incorporate into their comments.

I also requested that the Lolo National Forest add an amendment, one that extends the Ninemile Demographic Connectivity Area to areas to the south of the Clark Fork River. It should be noted that this idea was put forth in public comments during the Draft Conservation Strategy for grizzly bear in the NCDE. Specifically, the Ninemile Wildlife Working Group in its May 8, 2015 comment suggested,

> "One item that is obviously missing from this amendment includes Lolo National Forest lands that are south of the Ninemile DCA. There is no provision for considering connectivity needs between the Ninemile DCA and the Bitterroot ecosystem. Connectivity needs do not end at the DCA boundary. Future activities in this area south of the DCA should be analyzed for how they would influence grizzly bear movement. New facilities or expansion of existing facilities in important wildlife connectivity areas should be avoided. Project design and access management should maintain or enhance the ability of grizzly bears to move between the Northern Continental Divide, the Selkirk/Cabinet-Yaak and the Bitterroot ecosystems." Document C attached.

This would go a long way to connecting the NCDE with the Bitterroot ecosystem and ensuring grizzly bear recovery.

Proposed Remedy:

- Reverse decisions reached in after hour discussions, pull the DN/FONSI and prepare an EIS with a purpose and need to improve habitat quality and connectivity in the Sawmill Petty Project Area.
- Prepare an EIS that reflects science and conditions more recent than 2003.

[1] Crow Indian Tribe, et al. v. United States of America, et al. (Case 9:17- cv-00089-DLC Document 266, Filed 09/24/18)

- Prepare and implement an amendment to the Lolo Forest Plan that establishes Petty Creek and other adjoining drainages, especially those that have landowners interested in conservation easements as a Demographic Connectivity Area.

2. Failure to adequately consider dropping Units J11-J20 in the Garden Point IRA, and to develop and fully analyze Alternative C: No Treatment in IRA's.

In my October 4, 2020 comments I requested Alternative C: No Treatment in IRA's be fully developed and analyzed in an EIS with emphasis on habitat, connectivity, and conservation opportunities for grizzly bear and other species. I also requested that Units J11-J20 in the Garden Point IRA be eliminated.

On pages 4 to 5 of my comments I specifically requested: "Based on the forest service's analysis for the Roadless Rule,[2] "results of our evaluation highlight the value of inventoried roadless areas towards maintaining a representative network of *relatively* (emphasis added) undisturbed areas that function as conservation reserves in the United States, supporting a diversity of plant and animal species. The conservation of inventoried roadless areas under the action alternatives would expand ecoregional representation, increase acreage of low elevation, biologically productive areas, and increase the number of areas large enough to provide refugia for species needing large tracts relatively undisturbed by people."

The Garden Point IRA has been 'managed', i.e. roaded and logged. Please see Sawmill Petty IRA report Figure 3: Previous timber harvest within Sawmill Petty. However, when overlain with Figure 4: Proposed activities within IRA and roadless area expanse in the Sawmill Petty Area, it is clear units J11-J20 would effectively 'manage' what remains of the IRA. The DN forestalls the option to restore or rewild the IRA, and does so without a detailed analysis. Questions such as, what was the purpose and need of the prior 'management' entry in the late 1990's as the 2001 Roadless Rule was in development, has that entry accomplished the purpose and need, if not why, if so why the need to reenter, are unanswered.

This and other information and rationale is not disclosed in the report, which states only, "The proposed activities would not be subject to the Roadless Rule prohibition on timber cutting sale and removal under the following exception: 36 CFR 294.13 (b) (ii)(4) (4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. *Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area and prior to January 12, 2001* (emphasis added). Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area."

A discussion under the header, roadless expanse without project activities, states that the area does not have high value as a reference landscape and defers to a, "Detailed analyses of the effects of project activities for the entire project area, including the roadless expanse on the water, soils, and plant communities *are documented in the Project File* (emphasis added). Documenting such an important detailed analysis in a project file, let alone during the time of Covid when offices are closed and employees are working from home rendering the project files inaccessible is not adequate. Add to this the importance of the Sawmill Petty area for connectivity between the Ninemile Demographic Connectivity Area and the Bitterroot Ecosystem grizzly bear recovery area, which alone should have required this analysis be fully disclosed in the Environmental Assessment and Decision Documents.

IRA report Figure 2: Roadless lands contiguous to the Petty Mountain and Garden Point IRAs within the Sawmill Petty project area and Petty Mountain and Burdette IRA's to be analyzed as part of the roadless expanse, shows the potential for contiguous suitable habitat beneficial to connectivity between grizzly bear recovery areas, as well as lynx recovery. A full analysis, including an alternative that does not

[2] USDA Forest Service Roadless Area Conservation Final Environmental Impact Statement. November 2000. Landscape Analysis and Biodiversity Specialist Report.

diminish the IRA and disclosure in an EIS is warranted.

On page five of the DN/FONSI it references 'dropping portions of Units J17, J20, and S57' that helps to address comments expressing concerns about the amount of harvest proposed (including in the IRA specifically), effects on wildlife, and is focused on protecting lynx habitat. However, on page one it says, "and deferring treatment on portions of three units (J17, J20, and S57) based on further field verification of lynx habitat modeling results.' Please clarify whether these units are dropped or deferred and be consistent.

Proposed Remedy:

- Develop and fully analyze Alternative C: No treatment in IRAs, with emphasis on habitat, connectivity, and conservation opportunities.
- Drop units J11 to J20 in the Garden Point IRA and focus on road decommissioning.

3. Failure to adequately address my comments regarding the ecological role and resource benefits of wildland fire or the tradeoffs of active management on other resources.

I appreciate that you took the time to research and find application of the concept of fire refugia to the Sawmill Petty project. [Maddens et al. (2018) define fire refugia as "landscape elements that remain unburned or minimally affected by fire, thereby supporting post-fire ecosystem function, biodiversity and resilience to disturbances." Downing et. al. (2020) identify fire refugia specifically as unburned or low-severity burned locations within fire perimeters where overstory trees survived large fire events]. It is my limited understanding that fire refugia are driven as much by physiographic and topographic conditions as vegetative. My main point is that the proposal does not adequately analyze for variability across the landscape, including the role of fire refugia[3],[4]. While the proposal states that treatments would be designed to mimic wildfire patterns, indicating an understanding that wildland fire has a role on the landscape, the discussion is skewed to justifying the proposal rather than consideration and rigorous analysis of a range or alternatives and best available science. I appreciate that the forest service is willing to look into this. However, without further study and modeling, the concept of fire refugia is hard to apply and impossible to overlay by preconceived response to vegetative conditions, some of which is commodity driven.

As stated in my October 2020 comments, in a study of fire refugia in central Washington, Kolden et.al's (2017)[5] found that "almost all of the plots burned, but half of the plots persisted in their pre-fire forest structure successional state, suggests that definitions of fire refugia focused on the maintenance of forest structure or canopy thresholds may reveal a higher proportion of refugia that are persistent through multiple fires." It is not so much that areas don't burn, but that the forest structure persisted following multiple burns. Applying these principles could contribute to a more nuanced proposal. Rather than repeat everything here, I'm incorporating by reference my more detailed discussion in my October 4, 2020 comments. I'm not a forester but I do have an understanding of geomorphology and physiographic properties on the landscape. It would benefit foresters and fire analysts to utilize some of the tools available such as the Lolo Landtype Associations and multi-disciplinary resource skills such as the forest landscape architect.

[3] Camp et.al 1997, Predicting late-successional fire refugia pre-dating European settlement in the Wenatchee Mountains - In: Forest Ecology and Management July 1997.pdf.
[4] Meddens et.al. 2018. Fire Refugia: What are they and why do they matter for global change. In *BioScience* XX: 1–11. Published by Oxford University Press on behalf of American Institute of Biological Sciences 2018. This work is written by (a) US Government employee(s) and is in the public domain in the US. doi:10.1093/biosci/biy103
[5] Kolden et.al. 2017. Fire Effects on Historical Wildfire Refugia in Contemporary Wildfires. In *Forests* 2017.

Rhodes and Baker[6] examined the effectiveness of fuels treatments over time and the non-treatment risks based on probability of fire occurrence in western forests and the transient nature of fuels treatment. They estimated that fuel treatments have a mean probability of 2.0-7.9% of encountering moderate- or high-severity fire during an assumed 20-year period of reduced fuels. If wild fire doesn't encounter a treated area, there is no or reduced efficacy to the treatment. So, no matter what the forest service does the probability of vegetative treatment effecting recurrence of wildland fire may be relatively small.

In addition, there are ecological risks associated in the fuels treatment themselves. I appreciate the forest service is incorporating skyline harvest, which can have less impact than ground based harvest and machine piling. It is also incorporating a range of visual quality standards. However, the 28 miles of new road construction including 19 miles of permanent and 9 miles of temporary roads could diminish any benefit achieved by the additional expense of skyline harvest.

Rhodes and Baker considered fuels treatment in context of ecological risks. They documented that:

> "Although some fuel-treatment methods could have lower impacts, …construction and increased use of roads and landings can increase soil erosion, compact soils, and elevate surface runoff. Although the effects of prescribed fire on watersheds are typically limited and fleeting, it can increase soil erosion and sediment delivery, sometimes significantly and persistently, especially if fires escape and burn larger and more severely than planned.
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> When impacts are extensive, proximate to streams, or in terrain with erosion hazards, treatments can increase runoff and sediment delivery to streams. Road activities that increase sediment production, such as elevated road traffic, often affect stream crossings where sediment delivery is typically efficient and difficult to control. Elevated sediment delivery to streams contributes to water quality degradation that impairs aquatic ecosystems.
>
> The extent and frequency of treatments may be significant. Agee and Skinner suggested repeating treatments every 10-20 years, due to transient effects on fuels.
>
> Repeated treatments increase the potential for cumulative effects on aquatic ecosystems due to the persistence and additive nature of watershed impacts over time and may increase the establishment of non-native plants [9]. The chronic watershed impacts from repeated treatments may be more deleterious to native fish than pulsed disturbances from wildfires.
>
> Additional degradation of aquatic habitats on public lands may hamper efforts to protect and restore aquatic biodiversity. These habitats are increasingly important as cornerstones for restoring aquatic ecosystems and native fish."

Rhodes and Baker recognized that while their "analysis focuses on higher-severity fire in bounding the effectiveness of fuel treatments and their net watershed effects, these fires do not have solely negative effects. Higher-severity fire benefits watersheds and aquatic ecosystems in several ways, including providing a bonanza of recruitment of large wood and pulsed sediment supply that can rejuvenate aquatic habitats and increase their productivity. High severity fire is also a key process for the restoration of structural heterogeneity in forests, which is important for biodiversity." They concluded: "At the scales of our analysis, results indicate that even if fuel treatments were very effective when encountering fire of any severity, treatments will rarely encounter fire, and thus are unlikely to substantially reduce [ecological] effects of high-severity fire."

In addition to being a benefit to grizzly recovery and connectivity as discussed above, eliminating units in the Garden Point IRA may benefit from findings of Bradley et.al that found fire severity was reduced

[6] Rhodes J.R. and W.L. Baker 2008. Fire Probability, Fuel Treatment Effectiveness and Ecological Tradeoffs in Western U.S. Public Forests. In: *The Open Forest Science Journal, 2008, Volume **1*** **1874-3986/08**

in forests protected from logging. They concluded[7]:

> "In general, our findings—that forests with the highest levels of protection from logging tend to burn least severely—suggest a need for managers and policymakers to rethink current forest and fire management direction, particularly proposals that seek to weaken forest protections or suspend environmental laws ostensibly to facilitate a more extensive and industrial forest–fire management regime. Such approaches would likely achieve the opposite of their intended consequences and would degrade complex early seral forests (DellaSala et al. 2015). We suggest that the results of our study counsel in favor of increased protection for federal forestlands without the concern that this may lead to more severe fires.
>
> "Allowing wild fires to burn under safe conditions is an effective restoration tool for achieving landscape heterogeneity and biodiversity conservation objectives in regions where high levels of biodiversity are associated with mixed-intensity fires (i.e., "pyrodiversity begets biodiversity," see DellaSala and Hanson 2015*b*). Managers concerned about fires can close and decommission roads that contribute to human-caused fire ignitions and treat fire-prone tree plantations where fires have been shown to burn uncharacteristically severe (Odion et al. 2004). Prioritizing fuel treatments to flammable vegetation adjacent to homes along with special measures that reduce fire risks to home structures are precautionary steps for allowing more fires to proceed safely in the backcountry (Moritz 2014, DellaSala et al. 2015, Moritz and Knowles 2016).
>
> "Managing for wild fire benefits as we suggest is also consistent with recent national forest policies such as 2012 National Forest Management Act planning rule that emphasizes maintaining and restoring ecological integrity across the national forest system and because complex early forests can only be produced by natural disturbance events not mimicked by mechanical fuel reduction or clear-cut logging (Swanson et al. 2011, DellaSala et al. 2014). Thus, managers wishing to maintain biodiversity in re-adapted forests should appropriately weigh the benefits of wild fires against the ecological costs of mechanical fuel reduction and fire suppression (Ingalsbee and Raja 2015) and should consider expansion of protected forest areas as a means of maintaining natural ecosystem processes like wildland fire."

Krawchuck[8] (2016) found:

> "Identifying the locations of topographic fire refugia in forested landscapes can inform forest harvest, fire operations, landscape restoration, and conservation. … Increasingly, thinning is used to reduce the risk of forest fires (Agee and Skinner 2005), often based on the philosophy of emulating natural disturbance. Wildfire management frequently utilizes burnouts as a safety measure to clear flammable vegetation from within the anticipated fire perimeter. Unfortunately, all of these practices may be altering, or removing, critical patches and corridors for the establishment, persistence, and movement of organisms in burn mosaics. In an era of increasing concern over undesirable ecological outcomes of fire, our thinking needs to remain focused on the important landscape heterogeneity generated by burning. This pyrodiversity includes low-severity/unburned refugia through to high severity fire and the landscape mixtures in between (Agee 1993, Perera and Buse 2014, DellaSala and Hanson 2015, Hutto et al. 2016) all as components of fire-resilient ecosystems, though the frequency, extent, and proportions of fire

[7] Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher re severity in frequent- re forests of the western United States? Ecosphere October 2016 Volume 7(10): e01492. 10.1002/ecs2.1492. www.esajournals.org.

[8] Krawchuk, M. A., S. L. Haire, J. Coop, M.-A. Parisien, E. Whitman, G. Chong, and C. Miller. 2016. Topographic and fire weather controls of fire refugia in forested ecosystems of northwestern North America. Ecosphere 7(12):e01632. 10.1002/ecs2.1632

severities differ importantly among vegetation types. Our conceptual framework advances understanding of the predictability, structure, and function of topographic fire refugia as a component of contemporary burn mosaics in western North America."

Finally, I specifically requested, a detailed analysis of the effects of the proposal to reduce or eliminate forest protections and increase logging in the IRA, based on the belief that restrictions on active management have or will increase fire severity[9]. In addition, I requested a decision that considered and disclosed how and why logging miles from home would protect the community more than establishing and improving Home Ignition Zones closer to these values at risk. This decision did not respond to my comments.

Despite some good efforts and reports, the proposal relies too narrowly on vegetative treatment far from homes and increase in roads to access and haul timber.

Proposed Remedy:

- Prepare an EIS that:
  - Develops and fully analyzes Alternative C: No treatment in IRAs, that in addition to an emphasis on habitat, connectivity, and conservation opportunities, incorporates and analyzes findings that "forests with the highest levels of protection from logging tend to burn least severely".
  - Develops and fully analyzes Alternative D: No new roads and with a focus on road decommissioning.
  - Incorporates and analyzes effects of variation on the landscape in project design.
  - Deemphasizes commodity and enhances a focus on processes, providing a more rigorous analysis of the role of wildland fire on the landscape, how fire suppression and logging might have damaged not helped forest function and health, and ways to remedy.
  - Discuss the cost to benefits considering intrinsic values such wildlife, water quality, fisheries and other ecosystem functions.
  - Discuss prevalence of insect and disease and current science of the ecological role of these natural forest functions and how these benefit or harm forest health and resilience, and how attempts to remove effects genetic diversity in the post harvest residual stands.

4. The decision does not address or respond to my comments on the responsibility of individuals living in the Wildland Urban Interface to observe firewise practices or the forest service role in promoting defense of structures and Home Ignition Zones.

A primary purpose of the project is to reduce the risk of wildfire to communities and decrease the potential for high intensity wildfire. However, it all but ignores that defense of structures is the most effective means to reduce the hazards of wildfire to communities and individual property and life. My comments in this regard have been ignored even though I think most citizens would support reasonable treatments such as pre-commercial thinning and prescribed fire to address impacts of decades of mismanagement. There has been a lot of reporting and recent science on this defense of structure and more recently Home Ignition Zone. I'm incorporating by reference my October 2020 comments that discuss this issue in much more detail.

Proposed Remedy:

- Refocus the purpose from restoration based on logging across the landscape to treating the area in the immediate vicinity around communities. Analyze for varying distances, some as

[9] Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? Ecosphere 7(10): e01492. 10.1002/ecs2.1492

little as 120 feet around homes.

- Work with the county to incorporate some of the recent efforts focusing on the Home Ignition Zone.

5. The Decision fails to respond to my concern regarding equity in opportunity for public involvement.

I am concerned that given the growing trend toward collaboration and recent media coverage of the so-called 'good neighbor authority', agencies, industry, and any so-called 'stakeholders' have had early and more meaningful input to this project. I requested the decision disclose the history of project development and any external agencies and other stakeholders and timeline and details of their involvement. This was not done. In addition, while only 10 individuals, organizations, businesses, and other entities are listed as having responded to comments on the EA, the notation following each comment goes as high as 16. This might be an error or it may be incomplete information provided. In any case it doesn't address my concern.

Finally, the Good Neighbor Authority was included in discussions and in the tracking and documentation of the DNRC Good Neighbor Authority bureau. I'm attaching documents from the DNRC that shows Sawmill Petty as a GNA project in January 2020. Sawmill Petty was not included in the Spring 2020 update. However, in the year-end report, Sawmill Petty was indicated on the project map stating 500 acres of restoration was completed. I wrote to District Ranger Tomasik, DNRC GNA Bureau Chief Greg Archie, and cc'd Sawmill Petty project lead Tami Paulsen with documentation, but received no response. I'm attaching documentation including the email cover (Documents D 1-4), January 2020 GNA report, Spring 2020 GNA report, and the year-end GNA report map. The report is too large to send but is linked in the cover letter. Not only did the DN/FONSI fail to address my concerns regarding the Good Neighbor Authority, the discrepancy in information and lack of communication heightened my concerns.

Proposed Remedy:

- Provide a more inclusive list of the 'stakeholders' and their roles.
- Provide an explanation of the use of the Good Neighbor Authority in the Sawmill Petty Project, including discrepancy between the end of year report and disclosure in the Decision Notice and FONSI.