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Comments: Thank you for this opportunity to comment. Please see the attached file for our comments.

Thanks for this opportunity to comment and share our concerns on the Red Lodge Mountain Fuels Project Proposal.

Proposal Process

In general, there needs to be more information in the proposal and request for comments as to how the process will move forward. There is no indication as to how the comments will be used in the process and what the next steps in the process are.

Categorical Exclusion

This project should not receive a categorical exclusion (CE) from the NEPA process until it can be shown that it meets all the requirements for a CE as outlined in the Forest Service Handbook (FSH) 1909.15, chapter 30.

1. Currently, the project area of 6,202 acres exceeds the 3,000 acre limit required to qualify for a CE as spelled out in HFRA, Section 605(c)(1). The project size will need to be scaled back to meet the requirement.
2. The project documentation needs to clearly show that the project area is in need of hazardous fuel reduction. FSH 1909.15, 32.3, 5. states that "[...] within designated landscape scale areas, projects carried out under this authority are: Prioritized in the wildland-urban interface; or if located outside the wildland-urban interface, limited to Condition Classes 2 or 3 in Fire Regime Groups I, II, or III that contain very high wildfire hazard potential[...]" It is unclear if any part of the project area meets either of these criteria. The project analysis and documentation also needs to capture actual fire risk, which incorporates more than simply the ecologically based FRCC. What are the point sources to protect and what is the risk and probability (different from harm) to those?
3. The project description needs to show that project area is not going to adversely impact threatened or endangered species, or designated critical habitat, species proposed for Federal listing or proposed critical habitat that may exist within the project area. FSH 1909.15, Chapter 30, Section 31.2(1) clearly states that "[...] Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS are: (1) Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species[...]"

Recreation Resources

Montana outdoor recreation is becoming more and more important to the state's economy. Outdoor recreation accounted for 4.3% of the 2020 Montana GDP, which was the higher percentage of any state in the union (Montana Free Press, 11/9/21). Of the \$2.2 billion outdoor recreation added to the MT economy in 2020, \$1.1 billion went to wages and salaries for 26,169 direct Montana jobs according to the Outdoor Industry Association.

From the project description it appears the primary beneficiary of this project is the Red Lodge Ski Area. This area is already in FRCC 1 due to fires in the area over the past 25 years. A better approach than the proposed

project is to provide guidance to the ski area owners on how to fire-harden their structures. Then focusing attention on maintaining the forest as an ecological resource for other recreation opportunities.

Wild Bill Lake

The proposed project area encompasses more than Red Lodge Mountain. It includes the area around Wild Bill Lake. There is no mention of the rationale for including fuel treatments in the area surrounding the Lake, only the fuel treatments intended to protect the ski area and Red Lodge. Wild Bill Lake includes a picnic area, a 0.4-mile trail loop and two wheel chair accessible fishing docks. Half the trail is maintained barrier free for wheel chair accessibility. According to the Forest Service website, the public use of the Lake is heavy. Any fuel treatments in this area would decrease the recreational attractiveness of the area and impact the water quality of the lake. One possible remedy would be to remove this area from the project.

Rock Creek Watershed

The recent flooding along Rock Creek is a wakeup call for anyone who plans large scale land disturbance in the Rock Creek drainage. If this proposal moves forward the Forest Service is going to need to minimize ground disturbance and take additional measures to mitigate runoff

Other concerns we have are how this project will contribute to the introduction of invasive species, increased legal and illegal motorized traffic, erosion and further degradation of wildlife habitat, quality and quantity.