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Organization:

Title:

Comments: Please enter these comments in the public record and give them careful consideration.

Dear District Ranger Amy Haas and the Beartooth Ranger District, Custer Gallatin National Forest-

Thank you for providing the opportunity to comment on the proposed Burnt Mountain Project, although I believe the 30 day comment period (with limited public notification) in the middle of a busy Montana summer season is inadequate. This limited comment period does not give the public enough time to examine, understand and meaningfully comment on this controversial categorically-excluded project. I request that the comment period be significantly extended or renewed after further public notification (with maps) to allow for meaningful public input. Thank you for carefully considering and responding to my following comments.

As mentioned above, I believe there has been insufficient notice to the public about the Burnt Mountain Project. There are many treatments and units involved in the Project, and more time is needed for the public to field examine, digest and comment on these actions. I also understand that Categorical Exclusions must include a collaborative process involving diverse local interests. I request that a significant Collaborative be convened with local input to discuss and examine this new project. In addition, I ask that the Forest Service more comprehensively inform the public before the decision is finalized about the plans for this project and the many impacts it will have on local communities and wildlands along the Beartooth Front. Local awareness and understanding of the Burnt Mountain Project relative to the previously proposed GRLA project and the Red Lodge Mountain Fuel Reduction Project (RLMFRP) is currently somewhat confused and limited. When the public more completely understands the what, when, where, why and how of a project they can comment more meaningfully to all involved.

The cumulative effects of the Burnt Mountain Project when coupled with the effects of the Red Lodge Mountain Fuel Reduction Project have not been fully examined or discussed by the Forest Service or the public. The possibility that the commercial treatment contracts for the two may be issued together raises legal and ethical questions about the use of categorical exclusions(each with limited treatment acreage) to enable these projects to move forward. Viewing the projects in legal isolation ignores the effect of adjacent state and private lands' commercial and noncommercial treatments as well as those of adjacent CEs. The CG Forest and Beartooth District are obligated to present and review these cumulative impacts, and I request that they publicly do so.

The mechanized commercial thinning and related road-building proposed for the treatment units (27AT, 27T, 28T) adjacent to the Palisades Trail are significant negative impacts of the Burnt Mountain Project. Roading adjacent to this very popular and highly used trail (along with the mechanized treatment disturbance) seems short-sighted when a comparable result could be achieved through noncommercial and nonmechanized thinning without the extensive disturbance. This "temporary" road may be in existence for up to six or more years prior to "removal", and its presence may degrade locals' and visitors' recreational public wildland experiences. There is a cumulative negative recreational effect when the Palisades commercial mechanized disturbance and road-building is paired with RLMFRP treatment activity and road-building in the Nichols Creek drainage. I request that the road-building and mechanized

treatments for Unit 27AT, 27T, and 28T be eliminated from the Burnt Mountain Project and replaced with noncommercial nonmechanized thinning (and prescribed fire where appropriate).

I am also concerned by the clearcuts and mechanized commercial treatments planned for the Red Lodge Creek area. Soil disturbances coupled with a changing climate may result in poorer regeneration of forest stands in the area with wide-ranging consequences to wildlife habitat, viewsheds, forest diversity, water resources and wetlands, area recreation etc. I recommend redesigning the treatments in the Red Lodge Creek area so that greater emphasis is placed on noncommercial nonmechanized thinning and prescribed fire (where possible) rather than clearcuts and related shelterwood-type treatments.

In conclusion, I believe that the current configuration of the Burnt Mountain Project has some significant flaws, particularly when viewed in conjunction with the Red Lodge Mountain Fuel Reduction Project and forest treatments on adjacent state and public lands. Ten plus miles of new road-building along with the disturbances resulting from commercial mechanized treatment throughout the Project would best be reexamined and redesigned. More significant and widespread public notification, an official Collaborative review, and extended and greater opportunities for public input are necessary.

Thank you for careful consideration of these comments. I look forward to your response to these and other received public comments. Hopefully we can all work collaboratively to ensure the Burnt Mountain Project is the best possible fit for the Beartooth Front.

Best to you and your colleagues and entire staff.,

Scott Hancock