

Data Submitted (UTC 11): 11/24/2020 11:00:00 AM

First name: Richard

Last name: Hildner

Organization:

Title:

Comments: Dear Supervisor Steele:

The following objection to the Frozen Moose EA and FONSI is submitted in accordance with 36 CFR218 [sect]218.S(a). Respondent previously established standing by submitting written comments on January 16, 2020, and August 5, 2020. These two documents should be included by reference as provided in [sect] 218.S(b ).

While the overall objectives of the Proposed Action may seem laudable an Environmental Assessment is inadequate to the task of analyzing a project of this size and complexity. Therefore, I believe an Environmental Impact Statement is warranted. The document does not adequately address the short and long term effects of climate change on forest health and diversity. The effects of climate change and global warming should be addressed in any project of this scale.

The role and protection of security corridors for T&E species has yet to be established and delineated on project area maps. This must be addressed in an EIS.

Everyone recognizes the inadequacy of law enforcement in the North Fork drainage.

This is a staffing/funding issue, not a personnel issue. For example, the EA addresses physically closing roads to ORV/ ATV and then leaves underfunded law enforcement to deal with the issue when closures fail. ORV/ ATV technology is only going to become more, not less, sophisticated thus putting the burden on law enforcement. Don't create a problem you are unprepared to address. You must be able to demonstrate how road closures will be enforced. This should be addressed in the EA and certainly in the requested EIS.

The Environmental Assessment proposes over 600 acres of fuels management, including underburns. I have asked for, but never received, an analysis of the

number of acres backlogged for burning. As the backlog increases the ability to meet program goals decreases. The prescription is one thing but implementation is quite another. The prescription window for other than pile burning is quite narrow while the resources available are too limited. This was not specifically addressed in the EA.

An example of this prescription burden is Unit 308. Protecting structures to the east sounds like a reasonable objective. I have asked for, but never received, a copy of the prescription and desired post burn fuel load. I was told twelve tons/acre are a stated goal but I have never seen the fuel inventory. My personal observation is that this unit is already below the twelve-ton threshold. The need is clearly not demonstrated and ladder fuels are nearly nonexistent. Small clumps of ladder fuels that do exist within the unit should be retained as critical lynx habitat.

As I mentioned in my earlier comments, if mechanical thinning of reproduction resulting from the Wedge Fire, is to be carried out there must be sufficient funds to reenter the treated stands and thin out the clumps to release the dominant tree.

This has not been addressed in the EA.

Previously, I requested a definition of characteristic and uncharacteristic fire. The EA does not address this question. It would appear that due to climate change, large fires within the Frozen Moose project are becoming the norm.

A project of 8,077 acres in a remote corner of Northwestern Montana cannot be solely within the Wildland Urban Interface. There are areas that broadly meet the definition but these are not delineated in the EA and should be so in the EIS.

R~submitte

Richard Hildner