

November 24, 2020

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

Re: Objection to Frozen Moose Project; Flathead National Forest; Glacier View Ranger District;
Kurtis E. Steele, Forest Supervisor

Dear Reviewing Officer,

I appreciate the opportunity to file an objection to the finding of no significant impact as outlined in the draft decision notice for the Frozen Moose Project. I have previously sent written comments regarding this project on January 14th, 2020 and August 6th, 2020. Those comments addressed my concerns regarding the treatments in recommended wilderness, the reopening of roads and creation of temporary roads, as well as overall impacts to wildlife migration corridors and Wild and Scenic River values.

1. I believe that the cumulative effects merit a formal EIS. The North Fork is a unique ecosystem that is home to multiple endangered and threaten species including but not limited to grizzly bears, grey wolves, wolverines, lynx, bull trout, bald eagles, and white bark pine. While specific treatments planned may individually have limited impact, cumulatively there most certainly may be significant impacts not fully understood without the scrutiny provided by a formal EIS. Additionally, the project area has seen significant changes in the last 50 years including 2 major fires (Red Bench and Wedge); tremendous increase in visitor pressure; changes in the unique predator prey relationships and perhaps most importantly, climate change. The geographic context of the project is highly unusual and borders Glacier National Park, an international boundary with Canada and is home to a Wild and Scenic River Corridor. All of these associated values depend on thoughtful, detailed analysis of the cumulative impacts anticipated with the Frozen Moose project.

2. Whitebark pine treatment in proposed wilderness. I remain concerned about chainsaw treatment in proposed wilderness. This will not only cause a temporary impact while crews work but long term visual impact from chainsaw treatments. I look forward the opportunity to continue to explore a potential volunteer partnership with USFS that could complete the proposed whitebark pine treatment without the use of chainsaws.

3. Cumulative effects of dust, noise and recreational motorized vehicles on new or reopened roads. Dust abatement will need to continue to be considered during the project. Dust levels currently are a significant road hazard in terms of air quality, impacts on the visitor experience while boating and because of dangerous reduction in driver visibility. As you are well aware, illegal use of closed roads by recreational motorized vehicles is an escalating issue on the Forest. Indeed, since the last comment period on this project, we have seen escalating trespassing, including wheeled or tracked vehicles on private property. Current levels of funding for law enforcement make it impossible to adequately address this problem. New designs in recreational motorized vehicles allow operators to circumvent standard treatment (Design 30 and 43; pages 41 and 43) of road closures intended to discourage trespassers.

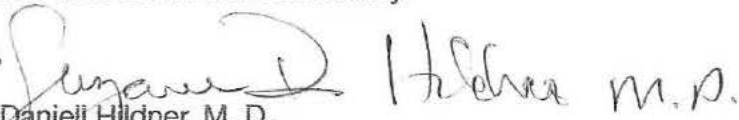
4. Stand treatments in the Wild and Scenic River Corridor. Mechanical treatments in the Wild and Scenic River Corridor will undoubtedly negatively impact user experience, multiplying the current threat of negative impact from overuse. Design feature 74 addresses this only for

the period June 15th to July 15th. Realistically, the high usage season on the River is from Memorial Day weekend to late September. The prescribed treatment most likely to effect user experience on the River, as well as affect nesting birds such as osprey, great blue herons and eagles is the precommercial thinning planned on Units 251h, 251m and 276. These treatments should be reconsidered.

The Frozen Moose Project, if well executed, has the potential to be an example for creative management of the remote rural wildfire interface across the nation's entire system of National Forests. As such, the FNF has the responsibility to complete an EIS so that a detailed baseline is established. Climate change alone should mandate a project of this scope in such a unique geographical setting. Please reconsider your finding of no significant impact.

I would like to conclude my comments by thanking the staff of the Glacier View Ranger District for their hard work on behalf of our public lands as well as their gracious, thoughtful responses to the North Fork Community.

Sincerely,


Suzanne Daniell Hildner, M. D.
