Data Submitted (UTC 11): 5/14/2022 6:00:00 AM First name: Russ Last name: Lawrence Organization: Title:

Comments: The Bitterroot Front Project remains problematic for public commenters. The landscape-scale project descriptions do not provide adequate site-specific information for informed critiques of proposed treatments. Since the description provided by the USFS is so general, these comments will of necessity be general in nature as well.

1. The most impactful action to reduce damage to lives, homes, and property needs to take place on private land, not public lands. As the Ravalli County Commissioners are eager to pursue "coordination" in hopes of directing land management policy on federal (public) lands, I urge the Bitterroot National Forest to withhold any treatment on federal lands in the WUI until Ravalli County enacts reasonable regulations for construction and maintenance for private lands in the WUI. Coordination needs to be a two-way street, and such regulation would be the single most effective way to protect lives, homes, and property, and to reduce federal, state, and local firefighting costs. The Bitterroot National Forest needs to engage productively with the Ravalli County Commissioners on this issue.

Any USFS efforts to reduce fire hazards should be focused on the immediate Hazardous Ignition Zone, where the impact will be most productive.

2. Climate considerations need to be foremost in the proposal. Reducing fire intensity and preserving old growth stands are critical to maintaining a positive carbon balance. Harvest and thinning are not definitively proven as tools in reducing fire intensity, whereas prescribed fires are.

3. The project should be subject to a full NEPA process/analysis. No corners cut, and a full public process, including site-specific proposed actions to allow for informed comment.

4. The scope of the proposal is too large. Protected areas should be withdrawn from the proposal. This includes designated Wilderness Areas, proposed Wilderness Management Areas, Inventoried Roadless Areas, and Research Natural Areas. If any such areas are included, any treatment should be focused on HIZ and should be done with the lightest hand possible.

5. Forest Resilience does not mean removing all the stressors present in nature. Fire, insects, fungus, and disease all are present in a resilient forest. They should be allowed to play their natural role in maintaining a healthy, diverse forest. Managing for resilience should not mean eliminating them.

6. The costs to the public should be clearly stated and transparently derived.