Data Submitted (UTC 11): 5/19/2022 6:00:00 AM

First name: Kelsey Last name: Milner Organization:

Title:

Comments: Thank you for the opportunity to comment.

I generally approve of including landscape level information in tackling the various management problems on the Bitterroot Front. The assessment of forest conditions, spatially displayed along with other land and resource attributes, provides a means for prioritizing treatment areas and the types of effective treatments.

There are two changes in the final rule regarding NEPA that concern me. In order to increase the scope and scale of projects, the use of categorical exclusions (CE's) has been increased and a new rule, the Determination of NEPA Adequacy (DNA), has been added. These changes are described as necessary to increase efficiency. I have no doubt they will do that! What concerns me is the loss of public input, reduced rigor in environmental analyses, and the potential for abuse.

This appears to be primarily a fuels reduction project aimed at protecting communities. This is a laudable goal, but what are the details? How many acres of what type of forest must be 'thinned', at what intensity, in order to achieve this goal? When does the public get to see these figures and make comments? Or is this a "trust us" situation? The use of DNA's and CE's are problematic here. For example, should the EIS for Gold Butterfly be used to justify a DNA for a project on the West Side?

I am not convinced that the best fire science has been applied in developing this proposal. In particular, the proposal states that opening up closed canopies will reduce risk of harmful fire, but other research suggests closed canopies provide for higher humidity and less intense fires. Let's not unnecessarily thin large numbers of acres if we don't have to.

Finally, I urge the USFS to continue focusing primarily on managing the BNF for the health and productivity of our natural infrastructure (forests, grasslands, water, and critters of all kinds). Human desires (like jobs and security) are important but secondary.