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Title:

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Dear Supervisor Anderson

I object to your 'condition based analysis' approach to this project whereby the details of Forest Service (FS) actions and their locations are withheld from the public until after a final decision has been made to proceed with the project. How can the public offer meaningful comments when we do not know what the FS is proposing to do and where? The public has a right to know which activities you plan to implement and where they will occur on our Forest before any decision is made. I believe this approach violates NEPA and more importantly, violates the Public Trust.

The BNF Scoping letter states in part that the project "aims to increase forest resiliency....". Logging destroys forest resilience - soil compaction and displacement, introduction of noxious weeds, stream sedimentation, and disruption of forest structure and succession. Commercial logging removes the very trees that have natural resistance to wildfire, disease, insects, drought and heat. The genetics of resistance is one of the most powerful forces in Nature, and with commercial logging you will be hauling away to the sawmill the very trees that will have resilience to a changing climate and changing forest conditions.

The BNF scoping letter states that the project will improve wildlife habitat. Wildlife requires hiding and thermal cover and from what I have observed on past FS projects, most of this cover is removed and leaves wildlife vulnerable. Nearly every major FS project in recent years has required a Forest Plan amendment for Elk Habitat Effectiveness, and this speaks directly to the fact that logging compromises wildlife security.

Listed under "Project Actions", the FS identifies fuel treatments and timber sales as a means of controlling wildfires. The large wildfires that are occurring across our country and the world are driven by weather events and in a larger context, by a hotter and drier climate caused by global warming. Nearly everyone in the world recognizes this now after decades of denial, yet the FS continues to focus on fuels reduction as the solution to wildfire on our forest. After a century of industrial logging and indiscriminate fire suppression, how can yet more logging be the solution. It cannot.

Commercial logging and road building should not be part of any project for which the purpose is to restore forest health.

James Miller, Hamilton, MT