

Data Submitted (UTC 11): 8/20/2024 11:36:04 PM

First name: Nancy

Last name: Hilding

Organization:

Title:

Comments: Dear FS Staff,

I think the clause in your letter saying:

"To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period."

may explain the rationale you use to log in an Inventoried Roadless Area, but does not address the appropriate NEPA document to be done before such logging.

Logging in an inventoried roadless area is an extraordinary circumstance & likely invalidates the use of a categorical exclusion. (Please see - 36 CFR 220.6 (b) (1)(iv)). Your description in the scoping letter does not have a special section on how the logging impacts to roadless area qualities will be mitigated. It only says - "there is no road construction, reconstruction, or maintenance being proposed with this project."

Due to my personal experience in the Black Hills National Forest, during the Forest Plan Revision effort (1991-1997), it is not just roads but also evidence of logging that disqualifies a piece of land from being included in a Forest Plan as part of an Inventoried Roadless Areas.

Senator Daschle got a congressional bill when Beaver Park Inventoried Roadless Area was logged to fight mountain pine bark beetle, to declare that the logging would not disqualify the area from eligibility for wilderness. As far as I know, you haven't got the ND delegation to get you a bill in congress to allow logging of your Wannagan Inventoried Roadless Area without disqualifying parts of it from wilderness eligibility.

You need to do an EA or perhaps an EIS, at least on the part of the project that adversely affects the IRA and may reduce the size of it that is eligible for wilderness protection.

Please also discuss the ROS classifications and the SIO objectives of the area and the effect of the logging project on those classifications and objectives. Will the scenic attractiveness change? Will the ROS characteristics that establish qualification for ROS classes change?