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Comments: The following are my initial comments on this large, complex project proposal.

- 1) The scope and complexity of this project demands an EIS approach versus an EA.
- 2) As the lead biologist for the Middle Fork Ecosystem Management Project in the 1990's, I am quite familiar with the location and complexities of this current proposed project. The project I worked on in the 1990's was smaller in scope, but its complexities required an EIS analysis.
- 3) Some of those complexities included T & E species habitat, roadless and recommended wilderness areas, Wild and Scenic River designation, and wildlife movement considerations across three major risk zones that involve a highway, railroad, and the Middle Fork Flathead River.
- 4) The proposed project area falls within a stand replacement regime of 150 to 200 years.
- 5) Much of the proposed project area contains steep slopes. When you factor in our changing climate conditions, I believe that no previous tree harvest is going to impede the fire spread on these steep slopes during a year with extreme fire conditions.
- 6) Given the complexities mentioned above and the importance of the project area to wildlife and fisheries, NO new roads are acceptable. I would consider winter logging on tractor ground using temporary snow roads.

Thank you for requesting comments on this proposed project. I look forward to reviewing your full and complete analysis of this proposed project.