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Comments: **Subject: Public Comment - Fridley Foothills Hazardous Fuels Reduction Project, Project #331238**

To Zachary Fisher, Yellowstone District Ranger

I am submitting comments on the proposed Fridley Foothills Hazardous Fuels Reduction Project.

I recognize the importance of maintaining healthy forests, addressing insect and disease outbreaks, and reducing hazardous fuel accumulations. Protecting communities from wildfire is a legitimate public objective.

However, the information currently presented on the Forest Service project page does not provide sufficient detail for the public to understand the scope of the proposed treatments, evaluate their environmental consequences, or determine whether the project qualifies for the categorical exclusion identified by the agency.

I have several concerns and requests for clarification.

1. Demonstrate compliance with the statutory requirements

The Forest Service identifies Section 603 of the Healthy Forests Restoration Act, 16 U.S.C. § 6591b, as the authority for the proposed categorical exclusion.

That statute establishes specific requirements, including:

- A maximum project size of 3,000 acres.
- Retention of old-growth and large trees, as appropriate.
- Consideration of the best available scientific information and ecological integrity.
- A collaborative process involving multiple interested persons representing diverse interests.
- No establishment of permanent roads.
- Decommissioning of temporary roads within three years of project completion.
- Compliance with applicable forest management plans.
- Specific geographic eligibility requirements.

Please provide the documentation demonstrating how this project satisfies each applicable statutory requirement.

In particular, please identify the designated treatment area under 16 U.S.C. § 6591a and explain how the proposed project meets the location requirements of Section 6591b.

2. Disclose the actual scope of the project

The project description does not identify the number of acres to be treated, the specific treatment methods, or the amount and type of timber that may be removed.

Please provide:

- A detailed project boundary and treatment-unit map.
- Total acreage and acreage by treatment type.
- The proposed tree species, size classes and stand conditions targeted.

- The anticipated volume of timber removal.
- Whether commercial timber harvesting is contemplated.
- Any proposed temporary roads, skid trails, landings or other access improvements.
- The anticipated duration and sequence of treatments.

The project description identifies forest products as one of its purposes, in addition to fuels management and vegetation management.

The Forest Service should explain how any commercial timber removal directly supports the stated ecological and hazardous-fuels objectives.

3. Provide the scientific basis for the proposed treatments

The agency states that the project will improve forest resilience to insects and disease and reduce hazardous fuel accumulations.

Please provide the forest health surveys, insect and disease assessments, stand inventories, fire behavior modeling and other scientific information supporting these conclusions.

I would also like to understand how the agency determined which areas require treatment and why the proposed methods are preferable to less disruptive alternatives.

4. Evaluate wildlife and ecological impacts

The Greater Yellowstone ecosystem supports important wildlife populations and interconnected habitats.

Please explain how the agency has evaluated potential impacts on grizzly bears, Canada lynx, wolverines, elk, deer and other wildlife.

The analysis should address habitat fragmentation, wildlife movement, disturbance from machinery and human activity, and the cumulative effects of roads and vegetation removal.

Please also identify any designated critical habitat, sensitive species habitat, old-growth stands, or other important ecological resources within or adjacent to the treatment areas.

5. Address water, soil and watershed impacts

Please identify the streams, tributaries, riparian areas and watersheds potentially affected by the project.

The agency should evaluate potential erosion, sedimentation, soil compaction, changes in runoff and impacts on aquatic habitat, particularly where mechanical equipment, roads or timber removal are proposed.

6. Explain the expected wildfire benefits

Reducing hazardous fuels is an important management objective, but the Forest Service should demonstrate how the proposed treatments will reduce actual wildfire risks.

Please identify the communities, infrastructure and other values at risk, the expected changes in fire behavior, and the anticipated duration of treatment effectiveness.

The agency should also explain whether strategic thinning, prescribed burning, hand treatments or other less

intensive approaches could achieve the stated objectives with fewer environmental impacts.

7. Clarify the project boundaries and public participation

The project overview identifies both the Yellowstone and Gardiner Ranger Districts, while the location summary identifies only the Yellowstone Ranger District. The county information also identifies both Gallatin and Park counties, while the location summary identifies Park County.

Please clarify the correct project boundary, affected ranger districts and counties.

Please also identify the collaborative process used to develop the proposal, the interests represented, and how public and community input influenced the proposed treatments.

8. Provide access to the supporting documents

I request access to the complete project record, including maps, technical reports, resource inventories, treatment prescriptions, environmental screening documents, and the agency's statutory eligibility determination.

The public needs sufficient information to understand the proposal before the agency makes its decision.

If the Forest Service cannot provide the necessary project information during the designated comment period, I request that the agency extend or reopen the opportunity for meaningful public comment.

9. Clarify the administrative review process

Because the agency identifies Section 603 of the Healthy Forests Restoration Act as its proposed authority, please explain whether the project will be exempt from the special administrative review process under 16 U.S.C. § 6515.

Please identify any remaining administrative review procedures and explain what opportunities the public will have to challenge the agency's decision.

Conclusion

I support responsible forest management and meaningful wildfire-risk reduction. However, those objectives should not eliminate the need for transparency, sound science, ecological safeguards and meaningful public participation.

A project involving federal forestlands should be supported by a clear description of what will be done, where it will occur, why the treatments are necessary, and how the agency will protect the ecological resources entrusted to its care.

I request that the Forest Service address these concerns in the project record before making a final decision.

Thank you for considering these comments.