

Data Submitted (UTC 11): 2/4/2020 3:46:29 PM

First name: Terry

Last name: Dokken

Organization:

Title:

Comments: This is more detail to my earlier comment:

On page 8 of the Supplemental EIS the need for action to reduce hazardous fuels includes the following objectives:

Reduce high-intensity wildfire within the Wildland Urban Interface (WUI) as identified in the Carbon County Community Wildfire Fire Protection Plan.

The minimum structure density as defined in the January 4, 2001 Federal Register (Vol. 66, No.3 ) is 1 or more structures per 40 acres to qualify as an intermix community, lowest threshold for of WUI community. The Carbon County Community Wildfire Protection Plan on page 5-23 states that "...the WUI situation in Carbon County most closely resembles the Intermix Community category although most areas have a structure density less than one per 40 acres..." In fact, the Carbon County Plan states that there are 2,552 structures in the 268 square miles that the Plan identifies as WUI. That is 0.6 structures per 40 acres - well below the 1 per 40 acres required to qualify as WUI.

The Red Lodge Creek area is where most of this proposed project's activity will occur. A 16 square mile block, which starts at the wilderness boundary and extends to highway 78 on the north and encompasses that part of the Greater Red Lodge Vegetation and Habitat Management Project centered along the Upper Red Lodge Creek Road contains approximately 100 structures for a structure density of 0.4 structures per 40 acres. This indicates that the WUI for the area around Red Lodge Creek does not exist and the need for action in this area to reduce the possibility of high-intensity wildfire to protect a WUI is moot. It should also be noted that in the Carbon County Plan, structures appears to include occupied residences and out buildings.

The money and effort would be better spent focusing on areas in Carbon County, or elsewhere ,where a WUI actually exists.

Attached is section 5 of the Carbon County Community Wildfire Protection Plan referenced in this objection.