



**March 7, 2021**

**HHAA Objection (as per the Objection Process) and Comment in Response to the USFS Middleman Project EA and Proposed Action:**

- 1) Inventoried roadless including recommended wilderness area boundaries should not be entered unless a fully functional regularly used road currently exists. These areas provide critical remaining wildlife habitat and security on the landscape.
- 2) The Middleman Project EA introduction states: The interdisciplinary team has decided the Middleman project will not significantly affect the quality of the human environment, nor will it significantly impact any resource areas, to the degree requiring an environmental impact statement...

HHAA disagrees with statement 2), and the finding of No Significant Impact. Among other impacts, this project does nothing to address big game security cover to ensure hunting opportunities are not negatively impacted for decades to come. HHAA has maintained this assertion while submitting comment in response to other Helena Lewis and Clark USFS projects. Why are big game security standards being flagrantly disregarded within the Middleman project plan? Straight forward options are available to avoid diminishing hiding over....simply carry out less "vegetative treatment". The purpose of having a big game security cover standard is to maintain essential habitat, not to circumvent the standard when it's most essential. Yes agencies manage for other interests besides elk, but big game hunting and wildlife provide far more economic stimulus and opportunity to communities than do public timber harvests (especially fuel mitigation efforts), despite political pressure to achieve harvest quotas and subsidize the timber economy. Economic statistics demonstrating this point are as well documented and no less nebulous to compute or quantify than values presented within the EA to summarize timber economics. The EA presents a monetary summation of timber jobs and timber value, but neglects parallel monetary synopsis for hunting, wildlife resource visitation and associated spending. Unequal analysis fails to put timber jobs in perspective alongside other interests, further warranting an EIS. Concluding that a 220 square mile project area providing highly valued public hunting opportunity is unaffected by large areas of logging and "mechanical vegetation treatment" is nonsensical, regardless of theoretical and unfounded rhetoric regarding wildfire. An EIS is essential, given impacts to public

hunting, big game security, wildlife habitat and outdoor enjoyment interests. The EA, while an option to precede an EIS, clearly does not preclude drafting an EIS in this case.

3) In accordance with comment 2 above, the 1986 Forest-Wide Standard 4a should be retained to limit road density / hiding cover ratios. All five project herd units are currently below standard 4a, and the project will further reduce hiding cover in all herd units. Temporary road construction is also proposed in four of five herd units.

4) Despite citing concerns about healthy ecosystems, diversified plant communities, riparian area restoration, forage availability, range allotment improvement, and sedimentation reduction, project documentation mentions next to nothing about current or historical economic grazing impacts to these elements. Nor are allotment impacts to wildlife, weeded areas, or water quality analyzed. Neglecting economic grazing impacts to vegetation within the context of a project this size makes project analysis incomplete. The modified proposed action briefly mentions “range allotment improvements” to “reduce sedimentation and “restore riparian areas” as part of “watershed restoration”, but specific actions to do so are scant, and without a metric to measure improvement. What amount of riparian areas will be fenced? Which ones? What priorities govern these efforts? Cattle consume the best and easiest forage first, so efforts to develop water supplies away from riparian areas won’t relieve pressure on riparian areas unless allotment riparian areas are fenced, or allotment numbers reduced. Developing water supplies may actually initiate wider cattle distribution, and increase forage competition with wildlife. The EA simply states the proposed action will “increase” forage. The draft decision of no significant impact states: “There is a need to maintain or improve range vegetative conditions and forage production for livestock and big game. Stressors such as conifer encroachment due to fire exclusion and noxious weed spread have reduced the health and production of many rangeland areas.” But cattle grazing has been documented to encourage conifer encroachment, weed proliferation, reductions in plant diversity, riparian area damage and streamside erosion.

*The supporting comment below was submitted during Scoping, but continues to be unaddressed:*

USFS administered grazing impacts are significant within the project area. According to USFS records, 10,186 AUMs are assigned to USFS grazing allotments in the project area, an impact equivalent to 850 cow calf pairs (1700 animals) year around, grazing the most available forage on just 65% of hunting district 392. The elk population objective for the entire hunting district (HD 392) is 1500. Please examine economic grazing effects to vegetation and riparian areas alongside any “restoration” efforts within the project area. One “treatment” might be to at least evaluate cattle grazing impacts to these areas. When it comes to the composition of vegetation, the impacts of economic grazing should be taken into account, as they contribute to conifer encroachment, negatively impact riparian areas, smaller wildlife, ornithological diversity and forage availability for game. Forest management is about more than tree removal, “management” and logging. Project planning without acknowledging economic grazing impacts is incomplete, and a failure to account for significant impacts to vegetation and wildlife.

5) The project area is largely uninhabited by people, calling into question the extensive “mechanical treatment” and logging to mitigate fire. The most effective way to guard against fire hazard

concentrates treatments around structures and property, instead of trying to manage vast interior areas. Nelson has virtually no population and is but a map reference point. The small community of York (through which a main road passes), Eldorado Heights and American bar are the most populated areas, and already situated in or adjacent to thinly timbered or burned areas, where the Missouri river acts as water supply and fire break much wider than artificially constructed firebreaks. Human population throughout the project area is incredibly low to justify treating thousands of interior acres away from dwellings.

What metric or criteria (distance, response time, spatial requirements, etc) is the USFS using to assess “firefighter accessibility and safety”, and what assumptions are being made on account of “firefighter safety accessibility and mobility and field “treatments”? This question does not diminish the value of safety to fire workers, but rather the feasibility of expectations regarding fire suppression accessibility and mobility in the project area. Aircraft are already used preferentially in cases where ground firefighting crews are at unjustifiable risk, and fire crews do not enter. Expectations to significantly ensure firefighter safety in this vast and rugged area are unrealistic and beyond feasibility, come at great cost to ecological wildland values, and are a pretext for logging.

6) The EA cites standing dead timber and woody fuels on the ground as a fuel load needing mitigation. Not only an unacceptable fire risk, but as a threat to “resiliency” and “ecological diversity”. The North Hills fire, the Gates of the Mountains Wilderness, and others burned areas have shown great resiliency without management. They are great habitat today, with standing dead and downed timber, and of course haven’t been prone to fires. Despite having considerable dead standing timber and ground fuels for decades, these areas have not burned due to these fuels. Standing dead timber is part of succession from infestation and fire, and after needle loss, is a lesser risk than is live timber. Dead timber stands are integral to ecological succession, provide varied habitats, horizontal hiding cover, and after a year or so have little economic value.

7) Summary Table 4 indicates the proposed action will aggravate weed infestation. Instead of taking action to mitigate and address weeds, the proposed action increases weed density and spread. Clearly temporary road construction increases weed presence, as all roads do. Reapportion projects funds to include weed mitigation. Table 4 further shows the proposed action to diminish summer elk habitat, summer elk cover, hunting season elk security, elk winter cover, mule deer winter range, non game wildlife indicator species, and threatened and endangered species like grizzly and lynx. This isn’t sound management, it’s an unwillingness to find better alternatives.

Stephen McEvoy, Board Member

On Behalf of Helena Hunters and Anglers Association