



Butte Ranger District
Attn: Michelle Peterson
1820 Meadowlark
Butte, MT. 59701

RE: Basin Creek – Butte Watershed Project #63295 Scoping Document

Dear Ms. Peterson,

I am writing on behalf of Cottonwood Environmental Law Center, a Bozeman-based conservation organization. Thank you for the opportunity to provide public comment to the Beaverhead-Deerlodge National Forest (“Forest Service”) on the Scoping Document for the Basin Creek – Butte Watershed Project (“Project”).

A. The Scoping Document does not acknowledge recent research in the Greater Yellowstone Ecosystem that indicates increasing regeneration failures in forests. Moving forward, the Forest Service must review this science to inform its forest treatment tactics.

The National Environmental Policy Act Implementing Regulations (“NEPA”) states that:

“Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents. Agencies shall make use of reliable existing data and resources.”¹

The Forest Service has historically ignored “reliable existing data and resources” when analyzing fuel reduction projects in the Greater Yellowstone Ecosystem. Specifically, the Forest Service has not acknowledged the recent research in the Greater Yellowstone that suggests that forests are less likely to regenerate in the face of climate change:

¹ § 1502.23 Methodology and scientific accuracy.



COTTONWOOD

ENVIRONMENTAL LAW CENTER

“We conclude that changing climate and fire could exceed the resilience of forests in a substantial portion of Greater Yellowstone, with profound implications for carbon, biodiversity, and recreation.”²

This information was not cited in the Forest Service’s Scoping Document for the Project.

Additionally, the Forest Service has not reviewed the Proceedings of the National Academy of Sciences’ (“PNAS”) recent research on how to adapt to more frequent wildfires. Considering that the purpose and need of this project is to “reduce the risk of uncharacteristic wildfire effects,” it is paramount that the Forest Service reviews all recent research on the subject. Research published in PNAS is especially relevant, given that it has shown that traditional fuel reduction and fire suppression tactics are “inadequate” in the face of a changing climate.³

Instead of analyzing current research, the Forest Service is relying on dated fuel reduction and fire suppression tactics that exacerbate climate change and reduce the resilience of forests in the Greater Yellowstone Ecosystem. The Project’s Scoping Document indicates that the Forest Service will continue to rely on these tactics, therefore ignoring current research, in this project. For example, the Scoping Document states that “regeneration harvests” are being considered:

“This type of harvest would occur in areas dominated by lodgepole pine, outside of the Inventoried Roadless Areas, and would remove nearly all trees from the site to facilitate regeneration of a new age class.”

² Rammer et al. “Widespread regeneration failure in forests of Greater Yellowstone under scenarios of future climate and fire.” July, 2021. <https://doi.org/10.1111/gcb.15726>.

³ Schoennagel, Tania, et al. “Adapt to More Wildfire in Western North American Forests as Climate Changes.” *Proceedings of the National Academy of Sciences*, vol. 114, no. 18, 2017, pp. 4582–4590., <https://doi.org/10.1073/pnas.1617464114>.



COTTONWOOD

ENVIRONMENTAL LAW CENTER

An essential tenant of “regeneration harvests” is that new trees will grow back in the area that is logged. The aforementioned research by Rammer et al. and Schoennagel, Tania, et al. indicates that this is unlikely to occur, given lower forest regeneration rates due to climate change.

The PNAS article also mentions a low likelihood of regrowth after thinning, another tactic that is being considered in the Project:

“Thinning may effectively restore more frequent, low-severity fire in some dry forests, but when thinning is combined with the expected warming, unintended consequences may ensue, whereby regeneration is compromised and forested areas convert to nonforest.”

By claiming that thinning and logging areas will “facilitate regeneration of a new age class,” and not acknowledging recent science that suggests the contrary, the Forest Service is failing to “make use of reliable existing data and resources” as required by NEPA.

To remedy this when moving forward with the Project, the Forest Service must analyze the recent science that suggests these logging tactics, when combined with climate change, are ineffective and will convert areas to nonforest.

B. The Project contradicts national climate change/forest objectives as set forth in 04/22/22 Executive Order.

Mature and old growth trees are vital to forest resilience, wildfire defense, and climate change mitigation. Eliminating these forests will exacerbate the issue of climate change by eliminating vital carbon sinks. The exacerbation of climate change will increase the frequency of “uncharacteristic wildfire effects,” ultimately negating the Project’s stated purpose and need.

The White House confirmed the importance of mature and old growth trees in an Executive Order earlier this year:

*“It is the policy of my Administration, in consultation with State, local, Tribal, and territorial governments, as well as the private sector, nonprofit organizations, labor unions, and the scientific community, **to pursue science-based, sustainable forest and land management;** conserve America’s mature and old-growth forests on Federal lands; invest in forest health and restoration; support indigenous traditional ecological knowledge and cultural and subsistence practices; honor Tribal treaty rights; and deploy climate-smart forestry practices and*



COTTONWOOD

ENVIRONMENTAL LAW CENTER

other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts” (emphasis added).⁴

C. Conclusion

Given the importance of mature and old growth forests in the face of climate change, it is important – and required by NEPA – that the Forest Service vigilantly reviews current research on forest regeneration as it moves forward with the Project.

Please contact me with any questions or responses you may have to Cottonwood Environmental Law Center’s comments on this project.

For the wild,

Isaac Cheek
Grassroots Conservation Coordinator
Cottonwood Environmental Law Center
isaactcheek@gmail.com

⁴ “Executive Order on Strengthening the Nation’s Forests, Communities, and Local Economies.” April 22, 2022.