July 4, 2024

Tyler's Kitchen Project Leader

Missoula Ranger District

24 Fort Missoula Road

Missoula, MT 59804

Dear Tyler's Kitchen Project Leader,

Please accept these comments from me on behalf of the Alliance for the Wild Rockies, Native Ecosystems Council, the Council on Wildlife and Fish, Yellowstone to Uintas Connection, Friends of the Clearwater and the Center for Biological Diversity (herein after Alliance) on the proposed Tyler's Kitchen Rules Reduction Project.

We believe because of the size of the project and the cumulative effects of past current and future logging by the Forest Service and private logging in the area the Forest Service must complete a full environmental impact statement (EIS) for this Project in stead of an EA that you are proposing.

The scope of the Project will likely have a significant individual and cumulative impact on the environment. Please include the BLM's Clark Fork Face project and logging and grazing on federal, state and private land in the area in your cumulative impact analysis.

Alliance has reviewed the statutory and regulatory requirements governing National Forest Management projects, as well as the relevant case law, and compiled a checklist of issues that must be included in the EIS for the Project in order for the Forest Service's analysis to comply with the law.

Following the list of necessary elements, Alliance has also included a general narrative discussion on possible impacts of the Project, with accompanying citations to the relevant scientific literature. These references should be disclosed and discussed in the EIS for the Project or in the EA if you refuse to write an EIS.

Please include the following information.

I. NECESSARY ELEMENTS FOR NEPA document:

A. Disclose all Lolo National Forest Plan requirements for logging/burning projects and explain how the Project complies with them;

B. Will this project comply with forest plan big game hiding cover standards and the eastside assessment?

C. Disclose the acreages of past, current, and reasonably foreseeable logging, grazing, mining, and road building activities within the Project area;

D. Solicit and disclose comments from the Montana Department of Fish, Wildlife, and Parks regarding the impact of the Project on wildlife habitat;

E. Solicit and disclose comments from the Montana Department of Environmental Quality regarding the impact of the Project on water quality;

F. Disclose the biological assessment for the candidate, threatened, or endangered species with potential and/or actual habitat in the Project area;

G. Disclose the biological evaluation for the sensitive and management indicator species with potential and/or actual habitat in the Project area;

H. Disclose the snag densities in the Project area, and the method used to determine those densities;

I. Disclose the current, during-project, and post-project road densities in the Project area;

J. Disclose the Lolo National Forest's record of compliance with state best management practices regarding stream sedimentation from ground-disturbing management activities;

K. Disclose the Lolo National Forest's record of compliance with its monitoring requirements as set forth in its Forest Plan;

L. Disclose the Lolo National Forest's record of compliance with the additional monitoring requirements set forth in previous DN/FONSIs and RODs on the Lolo National Forest;

M. Disclose the results of the field surveys for threatened, endangered, sensitive, and rare plants in each of the proposed units;

N. Please formally consult with the US FWS on the impacts of this project on candidate, threatened, or endangered species and plants;

O. Please formally consult with the US FWS on the impacts of this project on grizzly bears, whitebark pine, monarch butterflies, wolverines, lynx and bull trout, and bull trout critical habitat;

P. Will this project exacerbate existing noxious weed infestations and start new infestations?

Q. Do unlogged old growth forest store more carbon than the wood products that would be removed from the same forest in a logging operation?

R. What is the cumulative effect of National Forest logging on U.S. carbon stores? How many acres of National Forest lands are logged every year? How much carbon is lost by that logging?

S. Is this Project consistent with "research recommendations (Krankina and Harmon 2006) for protecting carbon gains against the potential impacts of future climate change? That study recommends "[i]ncreasing or maintaining the forest area by avoiding deforestation," and states that "protecting forest from logging or clearing offer immediate benefits via prevented emissions." That study also states that, "[w]hen the initial condition of land is a productive old-growth forest, the conversion to forest plantations with a short harvest rotation can have the opposite effect lasting for many decades . . . ." The study does state that thinning may have a beneficial effect to stabilize the forest and avoid stand- replacing wildfire, but the study never defines thinning. In this Project, where much of the logging is clear-cutting and includes removing large trees without any diameter limit, and where the removal of small diameter surface and ladder fuels is an unfunded mandate to the tune of over $3 million dollars, it is dubious whether the prescriptions are the same type of “thinning” envisioned in Krankina and Harmon (2006).

T. Please list each visual quality standard that applies to each unit and disclose whether each unit meets its respective visual quality standard. A failure to comply with visual quality Forest Plan standards violates NFMA.

U. For the visual quality standard analysis please define “ground vegetation,” i.e. what age are the trees, “reestablishes,” “short term,” “longer term,” and “revegetate.”

V. Please disclose whether you have conducted surveys in the Project area for this Project for wolverines, bull trout, pine martins, northern goshawk and lynx as required by the Forest Plan.

W. Please disclose how often the Project area has been surveyed for wolverines, pine martins, bull trout, northern goshawks, monarch butterflies, grizzly bears, whitebark pine and lynx.

X. Is it impossible for a wolverines, bull trout, pine martins, monarch butterflies, northern goshawks, grizzly bears, whitebark pine and lynx to inhabit the Project area?

Y. Would the habitat be better for wolverines, bull trout, monarch butterflies, pine martins, northern goshawks, grizzly bears, whitebark pine and lynx if roads were removed in the Project area?

Z. What is the U.S. FWS position on the impacts of this Project on wolverines, pine martins, bull trout, monarch butterflies, northern goshawks, grizzly bears, whitebark pine and lynx? Have you conducted ESA consultation?

AA. Please provide us with the full BA for the wolverines, monarch butterflies, pine martins, bull trout, northern goshawks, grizzly bears, whitebark pine and lynx.

BB. What is wrong with uniform forest conditions?

CC. Has the beetle kill contributed to a diverse landscape?

DD. Why are you trying to exclude stand replacement fires when these fires help aspen and whitebark pine?

EE. Please disclose what is the best available science for restoration of whitebark pine and lynx critical habitat;

FF. Disclose the level of current noxious weed infestations in the Project area and the cause of those infestations;

GG. Disclose the impact of the Project on noxious weed infestations and native plant communities;

HH. Disclose the amount of detrimental soil disturbance that currently exists in each proposed unit from previous logging and grazing activities;

II. Disclose the expected amount of detrimental soil disturbance in each unit after ground disturbance and prior to any proposed mitigation/remediation;

JJ. Disclose the expected amount of detrimental soil disturbance in each unit after proposed mitigation/remediation;

KK. Disclose the analytical data that supports proposed soil mitigation/ remediation measures;

LL. Disclose the timeline for implementation;

MM. Disclose the funding source for non- commercial activities proposed;

NN. Disclose the current level of old growth forest in each third order drainage in the Project area;

OO. Disclose the method used to quantify old growth forest acreages and its rate of error based upon field review of its predictions;

PP. Disclose the historic levels of mature and old growth forest in the Project area based on the Forest Plan definition of old growth;

QQ. Disclose the level of mature and old growth forest necessary to sustain viable populations of dependent wildlife species in the area;

RR. Disclose the amount of mature and old growth forest that will remain after implementation;

SS. Disclose the amount of current habitat for old growth and mature forest dependent species in the Project area;

TT. Disclose the amount of habitat for old growth and mature forest dependent species that will remain after Project implementation;

UU. Disclose the method used to model old growth and mature forest dependent wildlife habitat acreages and its rate of error based upon field review of its predictions;

VV. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security currently available in the area;

WW. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security during Project implementation;

XX. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security after implementation;

YY. Disclose the method used to determine big game hiding cover, winter range, and security, and its rate of error as determined by field review;

ZZ. Disclose and address the concerns expressed by the ID Team in the draft Five-Year Review of the Forest Plan regarding the failure to monitor population trends of MIS, the inadequacy of the Forest Plan old growth standard, and the failure to compile data to establish a reliable inventory of sensitive species on the Forest;

AAA. Disclose the actions being taken to reduce fuels on private lands adjacent to the Project area and how those activities/ or lack thereof will impact the efficacy of the activities proposed for this Project;

BBB. Disclose the efficacy of the proposed activities at reducing wildfire risk and severity in the Project area in the future, including a two-year, five-year, ten-year, and 20-year projection;

CCC. Disclose when and how the Lolo National Forest made the decision to suppress natural wildfire in the Project area and replace natural fire with logging and prescribed burning;

DDD. Disclose the cumulative impacts on the Forest-wide level of the Lolo National Forest's policy decision to replace natural fire with logging and prescribed burning;

EEE. Disclose how Project complies with the Eastside Assessment recommendations;

FFF. Disclose the impact of climate change on the efficacy of the proposed treatments;

GGG. Disclose the impact of the proposed project on the carbon storage potential of the area;

HHH. Disclose the baseline condition, and expected sedimentation during and after activities, for all streams in the area;

III. Disclose maps of the area that show the following elements:

1. Past, current, and reasonably foreseeable logging units in the Project area;

2. Past, current, and reasonably foreseeable grazing allotments in the Project area;

3. Density of human residences within 1.5 miles from the Project unit boundaries;

4. Hiding cover in the Project area according to the Forest Plan definition;

5. Old growth forest in the Project area; 6. Big game security areas;

7. Moose winter range;

The best available science, Christensen et al (1993),recommends elk habitat effectiveness of 70% in summer range and at least 50% in all other areas where elk are one of the prima- ry resource considerations. According to Figure 1 in Christensen et al (1993), this equates to a maximum road density of approximately 0.7 mi/sq mi. in sum- mer range and approximately 1.7 mi/sq mi. in all other areas.

Do any of the 6th Code watersheds in the Project area meet either of these road density thresholds? It appears the Project area as a whole also far exceeds these thresholds. Please disclose this type of Project level or watershed analysis on road density.

Are all of the roads that the Travel Plan closed actually closed?

How many road closure violations have there been in the Missoula Ranger District is the last 5 years?

It appears that the project violates the roadless rule. Please demonstrate that the project complies with the roadless rule.

The Roadless areas in the project area would be designated as Wilderness under the Northern Rockies Ecosystem Protection Act or (NREPA). Currently, twelve Senators are sponsoring NREPA in the Senate (S. 1531) NREPA recognizes this areas as an important wildlife corridor because of their importance as habitat for grizzly bears and lynx and connecting corridors for native species. Please find a copy of S. 1531 attached.
Please analyze the area for its wilderness potential.

Christensen et al (1993) state that if an area is not meeting the 50% effectiveness threshold of 1.7 mi/sq mi, the agency should admit that the area is not being man- aged for elk: “Areas where habitat effectiveness is retained at lower than 50 percent must be recognized as making only minor contributions to elk manage- ment goals. If habitat effectiveness is not important, don't fake it. Just admit up front that elk are not a consideration.” Please address this in the EIS or EA.

The Forest Service should provide an analysis of how much of the Project area, Project area watersheds, affected land- scape areas, or affected Hunting Districts provide “elk security area[s]” as defined by the best available science, The Eastside assessment, Christensen et al (1993) and Hillis et al (1991), to be comprised of contiguous 250 acre blocks of forested habitat 0.5 miles or more from open roads with these blocks encom- passing 30% or more of the area.

Please provide a rational justification for the deviation from the Hillis security definition and numeric threshold that represent the best available science on elk security areas.

The scoping notice for the Tyler's Kitchen Fuels Reduction Project, states on pages 15-16:

Logging is prohibited in IRAs; however, there are several exceptions to this restriction that may be pursued provided the management activity meets very specific conditions and approval is granted. In order to meet the project's purpose and need across the project area, vegetation treatments including timber harvest is proposed within the Silver King IRA (see Table 4 below). No road construction or reconstruction is proposed within the IRA (Table 5). The proposed action would be consistent with the 2001 Roadless Area Conservation Rule with application of the following exceptions:

- ***36 CFR 294.13(b)(1) - the cutting of generally small diameter timber is needed to maintain or restore the characteristics of ecosystem composition and structure,***

- ***36 CFR 294.13(b)(2) - the cutting of generally small diameter timber is incidental to the implementation of a management activity not otherwise prohibited, and***

- ***36 CFR 294.13(b)(4) Roadless characteristics have been substantially altered. About 14 miles of road construction and about 377 acres of subsequent timber harvest in the IRA occurred within the 1980’s and 1990’s. As such, effects of these activities have substantially altered roadless characteristics within the portion of the IRA were these past activities occurred.***
  Table 5. Vegetation management activities proposed in Silver King Inventoried Roadless Area

NEPA Unit	Treatment	Acres in IRA	Applicable IRA Exception

98, 99, 112

503, 516,518,519,524, 525, 526, 527,528,529

Regeneration Cut (Pine Beetle dead/dying Lodgepole)

Underburn (Restore natural fire regime)

97 (Substantially Altered) 36 CFR 294.13(b)(4)

1970 (Incidental Cutting) 36 CFR 294.13(b)(2)

	Intermediate Cut		
58, 59, 77, 87A, 88, 89, 97	(Douglas fir Beetle, overstocking, reduce competition,	147	(Ecosystem Composition) 36 CFR 294.13(b)(1)(ii)

NEPA Unit	Treatment	Acres	Applicable IRA Exception
609, 614, 920, 937, 938, 939	**Non-commercial treatments (Acquired Land Treatment** and **Small Tree Thinning)** (Douglas fir	132	(Ecosystem Composition) 36 CFR 294.13(b)(1)(ii)

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Unfortunately you are knowingly giving the public false information about the exceptions to prohibiting logging and removal of trees in roadless areas since you did not state 36 CFR 294.13(b)(4) correctly.

Following is the full text
of 36 CFR 294.13(b)(4) from the Roadless Area Conservation Rule:

(4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area and prior to January 12, 2001. Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area.

The scoping notice offer no evidence that the road construction and subsequent timber harvest occurred after the area was designated an inventoried roadless area and prior to January 12, 2001.

In fact the scoping notice states that on page 15: "About 14 miles of road construction and about 377 acres of subsequent timber harvest in the IRA occurred within the 1980’s and 1990’s.”

Reg. 3244 (Jan. 12, 2001). The Roadless Rule prohibits road construction and tree cutting in designated “Inventoried Roadless Areas” subject to limited exceptions. See Alaska, 273 F.-Supp.3d at 108.

For over 15 years, the Roadless Rule was the subject of litigation. See, e.g., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094, 1126 (9th Cir. 2002); California ex rel. Lockyer v. USDA., 575 F.3d 999, 1007 (9th Cir. 2009); Wyoming v. USDA, 661 F.3d 1209, 1272 (10th Cir. 2011); Organized Vill. of Kake v. USDA, 795 F.3d 956, 962 (9th Cir. 2015) (en banc); Alaska, 273 F.Supp.3d at 108–12. The Roadless Rule withstood these legal challenges. In relevant part, regarding the prohibition on tree cutting, the Roadless Rule mandates:

Prohibition on timber cutting, sale, or removal in inventoried roadless areas.

(a) Timber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section.

(b) Notwithstanding the prohibition in paragraph (a) of this section, timber may be cut, sold, or removed in inventoried roadless areas if the Responsible Official determines that one of the following circumstances exists. The cutting, sale, or removal of timber in these areas is expected to be infrequent.

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in § 294.11.

(i) To improve threatened, endangered, proposed, or sensitive species habitat; or

(ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period;

(2) The cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited by this subpart;

... .
36 C.F.R. §294.13 (2005)(emphases added).

The Roadless Rule further explains the meaning of the phrase "incidental to" in subsection (b)(2) above as follows:

Paragraph (b)(2) allows timber cutting, sale, or removal in inventoried roadless areas when incidental to implementation of a management activity not otherwise prohibited by this rule. Examples of these activities include, but are not limited to trail construction or maintenance; removal of hazard trees adjacent to classified road for public health and safety reasons; fire line construction for wildland fire suppression or control of prescribed fire; survey and maintenance of property boundaries; other authorized activities such as ski runs and utility corridors; or for road construction and reconstruction where allowed by this rule.

66 Fed. Reg. 3258.
In this project, the Project area includes in Inventoried Roadless Area. B2b:0004747. The Project allows tree-cutting in this Inventoried Roadless Areas across the forest.

It is unclear whether the Forest Service will be reconstructing old roads, using illegal user-created roads, or using roads already closed by the Travel Plan in the Inventoried Roadless Area in order to conduct these activities; the Project EA only states that, "No roads would be constructed in roadless areas."

The scoping notice states: "The Forest Service is considering options to use timber harvest and prescribed burning to address forest health and fuel concerns."

The cutting, sale, or removal of timber is not incidental to the implementation of a management activity, it is the purpose Removing fuel is not a valid exception to the Roadless Rule.

Please see the following article by George Wuerthner.

Opinion: What constitutes a healthy forest?

- ***GEORGE WUERTHNER | Guest columnist*** *https://www.postregister.com/opinion/guest_column/opinion-what-constitutes-a-healthy-forest/article_a1a1674e-43a0-11ef-918d-6f8eebf62f8e.html*

The Forest Service often asserts that logging reduces wildfires by "fortifying forest resilience against insects and disease."

We continuously hear from the Forest Service and others that logging creates a healthy forest. The main parameters defining a "healthy" forest are low mortality from natural agents like drought, insects and disease, high-severity blazes and rapid tree growth.

Of course, foresters define what constitutes a healthy forest, and by happy coincidence, the Industrial Forest Industry supports all the above criteria.

Such a definition demonstrates that most foresters and agency personnel fail to see the forest through the trees. They want green trees that grow fast because that is what the timber industry demands. But that is not what constitutes a healthy forest ecosystem.

The distinction between a "healthy forest" and a healthy forest ecosystem lies in the realization that an ecosystem is more than just green trees. Tree mortality and occasional episodic forest death are crucial components.

Dead trees serve as homes, food and shelter for a myriad of species, from bacteria and fungi to insects and amphibians, for birds and even for the largest mammals like bears. This understanding not only enlightens us about the complexity of forest health but also empowers us with a more holistic perspective.

However, when loggers cut down trees it disrupts the forest's natural balance and significantly reduces carbon storage.

When they suggest that this is protecting the trees from fire or other calamities, they never count the trees they have killed by thinning as a loss. This should be a cause for concern, as it directly impacts on our fight against climate change.

Logging is not a benign activity. Logging often requires roads, a major vector for spreading exotic weeds like cheatgrass. Logging roads are a chronic source of sedimentation in streams. Logging activities can disturb sensitive wildlife, forcing them into other areas where they may not have good habitat. Logging roads provide access to the forest for hunters, recreationalists and other humans that can further disrupt or disturb wildlife. Logging removes the physical biomass of tree boles, thus reducing the potential habitat for hundreds of species that may depend on dead wood or snags. Removing trees can even influence fisheries since logs falling into a stream provide a significant aquatic habitat for finny residents. But it can also impact more than fish and aquatic insects. Studies have shown that more logs in a stream provide more *habitat for aquatic insects, providing greater insect activity in the air above streams that birds and bats exploit.*

Logging removal of a significant portion of the trees may influence the forest's genetic adaptations by removing individual trees with specific alleles that may provide long-term survival to the forest stand.

For instance, some trees may have a greater resistance to some mortality factors like insects, drought, cold, wildfire and disease. These adaptations may only manifest if the stand experiences one of these agents. Since one can't tell which trees have any particular genetic adaptation, logging may reduce the "resilience" of the forest.

Rajora et al. (2000) compared genetic diversity between pre-harvest pristine and post-harvest residual gene pools of two adjacent, old-growth stands of eastern white pine in Ontario. The conclusion was that logging reduced genetic diversity in the post-harvest residual gene pools of the two old-growth stands. Also, all of the genetic losses were low-frequency or rare alleles, which may compromise the integrity of locally adapted gene pools and the ability of eastern white pine to respond to changing environmental conditions.

Such losses are seldom considered those advocating logging to promote forest "resistance." Logging reduces the ability of a forest stand to survive.

Logging sanitizes a forest. Rather than creating a "healthy forest ecosystem," it creates a degraded one.

George Wuerthner has written a number of books on ecological and environmental issues, in particular "Wildfire: A Century of Failed Forest Policy."

We believe that best available science shows that Commercial Logging does not reduce the threat of Forest Fires. What best available science supports the action alternative?

Please see the attached paper by Della-Sala 2022.

Please see the attached paper by Baker et al 2023.

Please see the column below by Dr. Chad Hanson.

https://thehill.com/blogs/congress-blog/energy-environment/590415-logging-makes-forests-and-homes-more-vulnerable-to

Logging makes forests and homes more vulnerable to wildfires

The West has seen some really big forest fires recently, particularly in California's Sierra Nevada and the Cascade Mountains of Oregon. Naturally, everyone is concerned and elected officials are eager to be seen as advancing solutions. The U.S. Senate is negotiating over the Build Back Better bill, which currently contains nearly $20 billion in logging subsidies for "hazardous fuel reduction" in forests. This term contains no clear definition but is typically employed as a euphemism for "thinning", which usually includes commercial logging of mature and old-growth trees on public lands. It often includes clearcut logging that harms forests and streams and intensifies wildfires.

Logging interests stand poised to profit, as they tell the public and Congress that our forests are overgrown from years of neglect. Chainsaws and bulldozers are their remedy. Among these interests are agencies like the U.S. Forest Service that financially benefits from selling public timber to private logging companies.

In this fraught context, filled with a swirling admixture of panic, confusion, and opportunism, the truth and scientific evidence are all too often casualties. This, unfortunately, can lead to regressive policies that will only exacerbate the climate cri-

sis and increase threats to communities from wildfire. We can no longer afford either outcome.

Many of the nation's top climate scientists and ecologists recently urged Congress to remove the logging subsidies from the Build Back Better bill. Scientists noted that logging now emits about as much carbon dioxide each year as does burning coal. They also noted that logging conducted under the guise of "forest thinning" does not stop large wildfires that are driven mainly by extreme fire-weather caused primarily by climate change. In fact, it can often make fires burn faster and more intensely toward vulnerable homes. Unprepared towns like Paradise and Grizzly Flats, Calif., unfortunately burned to the ground as fires raced through heavily logged surroundings.

Nature prepares older forests and large trees for wildfires. As trees age, they develop thick impenetrable bark and drop their lower limbs, making it difficult for fire to climb into the tree crowns. Older, dense forests used by the imperiled spotted owl burn in mixed intensities that is good for the owl and hundreds of species that depend on these forests for survival. Our national parks and wilderness areas also burn in lower fire intensities compared to heavily logged areas.

Occasionally even some of the largest trees will succumb to a severe fire but their progeny are born again to rapidly colonize the largest and most severe burn patches. Dozens of cavity-nesting birds and small mammals make their homes in the fire-killed trees. Soon after fire in these forests, nature regen-

erates, reminiscent of the mythical phoenix, aided by scores of pollinating insects and seed carrying birds and mammals.

Wildfires are highly variable, often depending on what a gust of wind does at a given moment, and even the biggest fires are primarily comprised of lightly and moderately-burned areas where most mature trees survive. By chance, in any large fire there will always be some areas that were thinned by loggers that burned less intense compared to unthinned areas. Before the smoke fully clears, logging interests find those locations and take journalists and politicians to promote their agenda. What they fail to disclose are the many examples where managed forests burned hotter while older, unmanaged forests did the opposite.

This sort of self-serving show boating occurred after the 2020 Creek Fire in the Sierra National Forest in California, as news stories echoed the logging industry's "overgrown forests" narrative based on a single low-intensity burn area. When all of the data across the entire fire were analyzed, it turned out that logged forests, including commercial "thinning" areas, actually burned the most intensely.

In Oregon, The Nature Conservancy has been conducting intensive commercial thinning on its Sycan Marsh Preserve. Based on satellite imagery, the northern portion of the 414,000-acre Bootleg Fire of 2021 swept through these lands. Within days, TNC began promoting its logging program, focusing on a single location around Coyote Creek, where a "thinned" unit burned lightly. They failed to mention that nearly all of the dense, unmanaged forests burned lightly too

in that area. Well-intentioned environmental reporters were misled by a carefully picked example.

Billions of dollars are being wasted to further this false logging industry narrative—funds that instead should be used to prepare communities for more climate-driven wildfires. Congress can instead redirect much needed support to damaged communities so they can build back better and adopt proven fire safety measures that harden homes and clear flammable vegetation nearest structures.

The path forward is simple, with two proven remedies that work. Protect forests from logging so they can absorb more carbon dioxide from the atmosphere and moderate fire behavior, and adapt communities to the new climate-driven wildfire era.

Chad Hanson, Ph.D., is a research ecologist with the John Muir Project and is the author of the 2021 book, "Smokescreen: Debunking Wildfire Myths to Save Our Forests and Our Climate." Dominick DellaSala, Ph.D., is chief scientist with Wild Heritage and the author of Conservation Science and Advocacy for a Planet in Peril: Speaking Truth to Power.

Please see the following letter from over 200 top U.S. climate and forest scientists asking Congressional leaders to avoid using the pandemic emergency as a means for stripping away forest protections and promoting logging. In a historic and unprecedented letter sent to Congress today, the scientists conclude that, in order to avoid the worst impacts of the climate crisis, moving beyond fossil fuel consumption is not enough, and we must also increase forest protections and shift away from energy-intensive and greenhouse-gas polluting wood consumption.

The scientists note that annual carbon emissions from logging in U.S. forests are comparable to emissions from the residential and commercial sectors combined. They ask legislators to reject false climate solutions that promote forest biomass logging (removal and incineration of trees for energy production) under the guise of "climate-friendly" or "carbon neutral" energy or logging for cross-laminated timber (CLT) and other wood products under the guise of carbon storage. Most of the carbon in trees is removed from forests when they are logged and quickly ends up in the atmosphere or in landfills, they caution. The scientists also note that logging, including commercial "thinning," can often increase fire intensity in forests, while damaging soils and removing vital nutrients, which undermines the carbon sequestration and storage capacity of forests.

"Forests are our only means for removing atmospheric carbon dioxide and storing the carbon long term at the needed scale. Burning wood in place of coal is accelerating global warming and decreasing the capacity of forests to counter the buildup of heat-trapping carbon dioxide," said Dr. William Moomaw of Tufts University. Dr. Chad Hanson, a forest ecologist with the John Muir Project, observed, "The dangerous excess CO2 that we've put into the atmosphere with fossil fuel consumption and logging will stay there for far too long if we don't take serious steps to bring it down, and forest protection is our best and most effective way to do that." Dr. Dominick DellaSala, Chief Scientist with the Geos Institute, added, "The vast majority of scientists warn that in order to avoid catastrophic climate impacts in the decades ahead, including new pandemics potentially linked to deforestation, we need to keep dinosaur-carbon in the ground and store atmospheric carbon in forests."

Rep. Kathy Castor, Chair, House Select Committee on the Climate Crisis Rep. Frank Pallone, Chair, House Energy and Commerce Committee Rep. Raúl Grijalva, Chair, House Natural Resources Committee

Rep. Collin Peterson, Chair, House Agriculture Committee

Sen. Lisa Murkowski, Chair, Senate Committee on Energy and Natural Resources Sen. John Barrasso, Chair, Senate Committee on Environment and Public Works Scientists concerned about climate and biodiversity impact of logging

13 May 2020

Dear Members of Congress,

As forest and climate change scientists and experts, we are writing to urge you to oppose legislative proposals that would promote logging and wood consumption, ostensibly as a natural climate change solution, based on claims that these represent an effective carbon storage approach, or claims that biomass logging, and incinerating trees for energy, represents renewable, carbon-neutral energy.

We find no scientific evidence to support increased logging to store more carbon in wood products, such as dimensional

lumber or cross-laminated timber (CLT) for tall buildings, as a natural climate solution. The growing consensus of scientific findings is that, to effectively mitigate the worst impacts of climate change, we must not only move beyond fossil fuel consumption but must also substantially increase protection of our native forests in order to absorb more CO2 from the atmosphere and store more, not less, carbon in our forests (Depro et al. 2008, Harris et al. 2016, Woodwell 2016, Erb et al. 2018, IPCC 2018, Law et al. 2018, Harmon 2019, Moomaw et al. 2019).

Furthermore, the scientific evidence does not support the burning of wood in place of fossil fuels as a climate solution. Current science finds that burning trees for energy produces even more CO2 than burning coal, for equal electricity produced (Sterman et al. 2018), and the considerable accumulated carbon debt from the delay in growing a replacement forest is not made up by planting trees or wood substitution (noted below). We need to increase growing forests to more rapidly close the gap between emissions and removal of CO2 by forests, while we simultaneously lower emissions from our energy, industrial and agricultural sectors.

In your deliberations on this serious climate change issue, we encourage you to consider the following:

§ The logging and wood products industries suggest that most of the carbon in trees that are logged and removed from forests will simply be stored in CLT and other wood products for buildings instead of being stored in forest ecosystems. However, this is clearly incorrect. Up to 40% of the harvested materi-

al does not become forest products and is burned or decomposes quickly, and a majority of manufacturing waste is burned for heat. One study found that 65% of the carbon from Oregon forests logged over the past 115 years remains in the atmosphere, and just 19% is stored in long-lived products. The remainder is in landfills (Hudiburg et al. 2019).

§ Logging in U.S. forests emits 617 million tons of CO2 annually (Harris et al. 2016). Further, logging involves transportation of trucks and machinery across long distances between the forest and the mill. For every ton of carbon emitted from logging, an additional 17.2% (106 million tons of CO2) is emitted from fossil fuel consumption to support transportation, extraction, and processing of wood (Ingerson 2007). In fact, annual CO2 emissions from logging in U.S. forests are comparable to yearly U.S. emissions from the residential and commercial sectors combined (https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks).

The cumulative climate change impact of logging in the U.S. is even higher, since logging causes substantial reductions in carbon sequestration and storage potential in forests due to soil compaction and nutrient removal, and these combined impacts can often reduce forest carbon storage potential by 30% or more (e.g., Elliott et al. 1996, Walmsley et al. 2009).

§ The wood products industry claims that substituting wood for concrete and steel reduces the overall carbon footprint of buildings. However, this claim has been refuted by more recent analyses that reveal forest industries have been using unrealistic and erroneous assumptions in their models, overestimating

the long-term mitigation benefits of substitution by 2 to 100-fold (Law et al. 2018, Harmon 2019). The climate impact of wood is even worse if the reduced forest carbon sequestration and storage caused by nutrient loss and soil compaction from logging is included, as discussed above.

In countless public communications, and at numerous Congressional hearings, industry representatives have advocated for increased logging in the context of reducing wildland fire and related emissions. While small-tree thinning can reduce fire intensity when coupled with burning of slash debris (e.g., Perry et al. 2004, Strom and Fulé 2007) under very limited conditions, recent evidence shows intensive forest management characterized by young trees and homogenized fuels burn at higher severity (Zald & Dunn 2018). Further, the extremely low probability (less than1%, Schoennagel et al. 2017) of thinned sites encountering a fire where thinning has occurred limits the effectiveness of such activities to forested areas near homes. Troublingly, to make thinning operations economically attractive to logging companies, commercial logging of larger, more fire-resistant trees often occurs across large areas.

Importantly, mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an example, logging in U.S. forests emits 10 times more carbon than fire and *native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth.*

We believe having a dialogue now would be productive, and we could help members of your Committees to

Sincerely,

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** Affiliations listed for identification purposes only*

We are hopeful that a new and more scientifically sound direction will be considered by Members that

emphasizes increased forest protections, and a shift away from consumption of wood products and forest

biomass energy, to help mitigate the climate crisis.

be more effective in achieving the

conservation and climate change goals that we share. We look forward to hearing from you and are

available to provide additional scientific sources and serve as a resource for your Committees as you

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The federal district court of Montana recently ruled against the Kootenai National Forest on the same boiler plate analysis, writing: Ultimately, greenhouse gas reduction must happen quickly, and removing carbon from forests in the form of logging, even if trees are going to grow back, will take decades to centuries to re-sequester. Put more simply, logging causes immediate carbon losses, while re-sequestration happens slowly over time, time that the planet may not have.

Please find the court's order attached.

Please follow NEPA and take a hard look at the impact of the project on climate change.

Please find attached a paper by W.R. Moomaw et al. 2019 titled, "Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good."

The found:

Climate change and loss of biodiversity are widely recognized as the foremost environmental challenges of our time. Forests annually sequester large quantities of atmospheric carbon dioxide (CO_2), and store carbon above and below ground for long periods of time. Intact forests—largely free from human intervention except primarily for trails and hazard removals—are the most carbon-dense and biodiverse terrestrial ecosystems, with additional benefits to society and the economy. Internationally, focus has been on preventing loss of tropical forests, yet U.S. temperate and boreal forests remove sufficient atmospheric CO_2 to reduce national annual net emissions by 11%. U.S. forests have the potential for much more rapid atmospheric CO_2 removal rates and biological carbon sequestration by intact and/or older forests. The recent 1.5 Degree Warming Report by the Intergovernmental Panel on Climate Change identifies reforestation and afforestation as important strategies to increase negative emissions, but they face significant challenges: afforestation requires an enormous amount of additional land, and neither strategy can remove sufficient carbon by growing young trees during the critical next decade(s). In contrast, growing existing forests intact to their ecological potential—termed proforestation—is a more effective, immediate, and low-cost approach that could be mobilized across suitable forests of all types. Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty.

This is the best available science. Why is the project not following it?

Please see the article below about Logging and wildfire by Dr. Chad Hanson.

October 5, 2022

"Fuel Reduction" Logging Increases Wildfire Intensity

A large and growing body of scientific evidence and opinion concludes that commercial thinning and post-fire logging/clearcutting makes wildfires spread faster and/or burn more severely, and this puts nearby communities at greater risk.

Morris, W.G. (U.S. Forest Service). 1940. Fire weather on clearcut, partly cut, and virgin timber areas at Westfir, Oregon. Timberman 42: 20-28.

"This study is concerned with one of these factors - the fire-weather conditions near ground level - on a single operation during the first summer following logging. These conditions were found to be more severe in the clear-cut area than in either the heavy or light partial cutting areas and more severe in the latter areas than in virgin timber."

Countryman, C.M. (U.S. Forest Service). 1956. Old-growth conversion also converts fire climate. Fire Control Notes 17: 15-19.

"Although the general relations between weather factors, fuel moisture, and fire behavior are fairly well known, the impor-

tance of these changes following conversion and their combined effect on fire behavior and control is not generally recognized. The term 'fireclimate,' as used here, designates the environmental conditions of weather and fuel moisture that affect fire behavior. It does not consider fuel created by slash because regardless of what forest managers do with slash, they still have to deal with the new fireclimate. In fact, the changes in wind, temperature, humidity, air structure, and fuel moisture may result in greater changes in fire behavior and size of control job than does the addition of more fuel in the form of slash."

"Conversion which opens up the canopy by removal of trees permits freer air movement and more sunlight to reach the ground. The increased solar radiation in turn results in higher temperatures, lower humidity, and lower fuel moisture. The magnitude of these changes can be illustrated by comparing the fireclimate in the open with that in a dense stand."

"A mature, closed stand has a fireclimate strikingly different from that in the open. Here nearly all of the solar radiation is intercepted by the crowns. Some is reflected back to space and the rest is converted to heat and distributed in depth through the crowns. Air within the stand is warmed by contact with the crowns, and the ground fuels are in turn warmed only by contact with the air. The temperature of fuels on the ground thus usually approximates air temperature within the stand."

"Temperature profiles in a dense, mixed conifer stand illustrate this process (fig. 2). By 8 o'clock in the morning, air within the crowns had warmed to 68° F. Air temperature near the

ground was only 50°. By 10 o'clock temperatures within the crowns had reached 82° and, although the heat had penetrated to lower levels, air near the surface at 77° was still cooler than at any other level. At 2:00 p.m., air temperature within the stand had become virtually uniform at 87°. In the open less than one-half mile away, however, the temperature at the surface of pine litter reached 153° at 2:00 p.m."

"Because of the lower temperature and higher humidity, fuels within the closed stand are more moist than those in the open under ordinary weather conditions. Typically, when moisture content is 3 percent in the open, 8 percent can be expected in the stand."

"Moisture and temperature differences between open and closed stands have a great effect on both the inception and the behavior of fire. For example, fine fuel at 8-percent moisture content will require nearly one-third more heat for ignition than will the same fuel at 3-percent moisture content. Thus, firebrands that do not contain enough heat to start a fire in a closed stand may readily start one in the open."

"When a standard fire weather station in the open indicates a temperature of 85° F., fuel moisture of 4 percent, and a wind velocity of 15 m.p.h.--not unusual burning conditions in the West--a fire starting on a moderate slope will spread 4.5 times as fast in the open as in a closed stand. The size of the suppression job, however, increases even more drastically."

"Greater rate of spread and intensity of burning require control lines farther from the actual fire, increasing the length of

fireline. Line width also must be increased to contain the hotter fire. Less production per man and delays in getting additional crews complicate the control problem on a fast-moving fire. It has been estimated that the size of the suppression job increases nearly as the square of the rate of forward spread. Thus, fire in the open will require 20 times more suppression effort. In other words, for each man required to control a surface fire in a mature stand burning under these conditions, 20 men will be required if the area is clear cut."

"Methods other than clear cutting, of course, may bring a less drastic change in fireclimate. Nevertheless, the change resulting from partial cutting can have important effects on fire. The moderating effect that a dense stand has on the fireclimate usually results in slow-burning fires. Ordinarily, in dense timber only a few days a year have the extreme burning conditions under which surface fires produce heat rapidly enough to carry the fire into the crowns. Partial cutting can increase the severity of the fireclimate enough to materially increase the number of days when disastrous crown fires can occur."

SNEP (co-authored by U.S. Forest Service). 1996. Sierra Nevada Ecosystem Project, Final Report to Congress: Status of the Sierra Nevada. Vol. I: Assessment summaries and management strategies. Davis, CA: University of California, Davis, Center for Water and Wildland Resources.

"Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other recent human activity."

“[I]n areas where the larger trees (greater than 12 inches in diameter breast height) have been removed, stand-replacing fires are more likely to occur.”

Beschta, R.L.; Frissell, C.A.; Gresswell, R.; Hauer, R.; Karr, J.R.; Minshall, G.W.; Perry, D.A.; Rhodes, J.J. 1995. Wildfire and salvage logging. Eugene, OR: Pacific Rivers Council.

“We also need to accept that in many drier forest types throughout the region, forest management may have set the stage for fires larger and more intense than have occurred in at least the last few hundred years.”

“With respect to the need for management treatments after fires, there is generally no need for urgency, nor is there a universal, ecologically-based need to act at all. By acting quickly, we run the risk of creating new problems before we solve the old ones.”

“[S]ome argue that salvage logging is needed because of the perceived increased likelihood that an area may reburn. It is the fine fuels that carry fire, not the large dead woody material. We are aware of no evidence supporting the contention that leaving large dead woody material significantly increases the probability of reburn.”

Chen, J., et al. (co-authored by U.S. Forest Service). 1999. Microclimate in forest ecosystem and landscape ecology: Variations in local climate can be used to monitor and compare the effects of different management regimes. BioScience 49: 288–297.

When moving from open forest areas, resulting from logging, and into dense forests with high canopy cover, “there is generally a decrease in daytime summer temperatures but an increase in humidity...”

The authors reported a 5? C difference in ambient air temperature between a closed- canopy mature forest and a forest with partial cutting, like a commercial thinning unit (Fig. 4b), and noted that such differences are even greater than the increases in temperature predicted due to anthropogenic climate change.

Dombeck, M. (U.S. Forest Service Chief). 2001. How Can We Reduce the Fire Danger in the Interior West. Fire Management Today 61: 5-13.

“Some argue that more commercial timber harvest is needed to remove small-diameter trees and brush that are fueling our worst wildlands fires in the interior West. However, small-diameter trees and brush typically have little or no commercial value. To offset losses from their removal, a commercial operator would have to remove large, merchantable trees in the overstory. Overstory removal lets more light reach the forest floor, promoting vigorous forest regeneration. Where the overstory has been entirely removed, regeneration produces thickets of 2,000 to 10,000 small trees per acre, precisely the small-diameter materials that are causing our worst fire problems. In fact, many large fires in 2000 burned in previously logged ar-

eas laced with roads. It seems unlikely that commercial timber harvest can solve our forest health problems."

Morrison, P.H. and K.J. Harma. 2002. Analysis of Land Ownership and Prior Land Management Activities Within the Rodeo & Chediski Fires, Arizona. Pacific Biodiversity Institute, Winthrop, WA. 13 pp.

Previous logging was associated with higher fire severity.

Donato DC, Fontaine JB, Campbell JL, Robinson WD, Kauffman JB, Law BE. 2006. Science 311: 352.

"In terms of short-term fire risk, a reburn in [postfire] logged stands would likely exhibit elevated rates of fire spread, fireline intensity, and soil heating impacts...Postfire logging alone was notably incongruent with fuel reduction goals."

Hanson, C.T., Odion, D.C. 2006. Fire Severity in mechanically thinned versus unthinned forests of the Sierra Nevada, California. In: Proceedings of the 3rd International Fire Ecology and Management Congress, November 13-17, 2006, San Diego, CA.

"In all seven sites, combined mortality [thinning and fire] was higher in thinned than in unthinned units. In six of seven sites, fire-induced mortality was higher in thinned than in unthinned units...Mechanical thinning increased fire severity on the sites currently available for study on national forests of the Sierra Nevada."

Platt, R.V., et al. 2006. Are wildfire mitigation and restoration of historic forest structure compatible? A spatial modeling assessment. Annals of the Assoc. Amer. Geographers 96: 455-470.

"Compared with the original conditions, a closed canopy would result in a 10 percent reduction in the area of high or extreme fireline intensity. In contrast, an open canopy [from thinning] has the opposite effect, increasing the area exposed to high or extreme fireline intensity by 36 percent. Though it may appear counterintuitive, when all else is equal open canopies lead to reduced fuel moisture and increased midflame windspeed, which increase potential fireline intensity."

Thompson, J.R., Spies, T.A., Ganio, L.M. (co-authored by U.S. Forest Service). 2007. Reburn severity in managed and unmanaged vegetation in a large wildfire. Proceedings of the National Academy of Sciences of the United States of America 104: 10743–10748.

"Areas that were salvage-logged and planted after the initial fire burned more severely than comparable unmanaged areas."

Cruz, M.G, and M.E. Alexander. 2010. Assessing crown fire potential in coniferous forests of western North America: A critique of current approaches and recent simulation studies. Int. J. Wildl. Fire. 19: 377–398.

The fire models used by the U.S. Forest Service falsely predict effective reduction in crown fire potential from thinning:

"Simulation studies that use certain fire modelling systems (i.e. NEXUS, FlamMap, FARSITE, FFE-FVS (Fire and Fuels Extension to the Forest Vegetation Simulator), Fuel Management Analyst (FMAPlus), BehavePlus) based on separate implementations or direct integration of Rothermel's surface and crown rate of fire spread models with Van Wagner's crown fire transition and propagation models are shown to have a significant underprediction bias when used in assessing potential crown fire behaviour in conifer forests of western North America. The principal sources of this underprediction bias are shown to include: (i) incompatible model linkages; (ii) use of surface and crown fire rate of spread models that have an inherent underprediction bias; and (iii) reduction in crown fire rate of spread based on the use of unsubstantiated crown fraction burned functions. The use of uncalibrated custom fuel models to represent surface fuelbeds is a fourth potential source of bias."

Thompson, J., and T.A. Spies (co-authored by U.S. Forest Service). 2010. Exploring Patterns of Burn Severity in the Biscuit Fire in Southwestern Oregon. Fire Science Brief 88: 1-6.

"Areas that burned with high severity...in a previous wildfire (in 1987, 15 years prior) were more likely to burn with high severity again in the 2002 Biscuit Fire. Areas that were salvage-logged and planted following the 1987 fire burned with somewhat higher fire severity than equivalent areas that had not been logged and planted."

Graham, R., et al. (U.S. Forest Service). 2012. Fourmile Canyon Fire Findings. Gen. Tech. Rep. RMRS-GTR-289. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 110 p.

Thinned forests "were burned more severely than neighboring areas where the fuels were not treated", and 162 homes were destroyed by the Fourmile Canyon Fire (see Figs. 45 and 46).

DellaSala et al. (2013) (letter from over 200 scientists):

"Numerous studies also document the cumulative impacts of post-fire logging on natural ecosystems, including...accumulation of logging slash that can add to future fire risks..."

DellaSala et al. (2015) (letter from over 200 scientists):

"Post-fire logging has been shown to eliminate habitat for many bird species that depend on snags, compact soils, remove biological legacies (snags and downed logs) that are essential in supporting new forest growth, and spread invasive species that outcompete native vegetation and, in some cases, increase the flammability of the new forest. While it is often claimed that such logging is needed to restore conifer growth and lower fuel hazards after a fire, many studies have shown that logging tractors often kill most conifer seedlings and other important re-establishing vegetation and actually increases flammable logging slash left on site. Increased chronic sedimentation to streams due to the extensive road network and runoff from logging on steep slopes degrades aquatic organisms and water quality."

North, M.P., S.L. Stephens, B.M. Collins, J.K. Agee, G. Aplet, J.F. Franklin, and P.Z. Fule (co- authored by U.S. Forest Service). 2015. Reform forest fire management. Science 349: 1280- 1281.

"...fire is usually more efficient, cost-effective, and ecologically beneficial than mechanical treatments."

Bradley, C.M. C.T. Hanson, and D.A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western USA? Ecosphere 7: article e01492.

In the largest study on this subject ever conducted in western North American, the authors found that the more trees that are removed from forests through logging, the higher the fire severity overall:

"We investigated the relationship between protected status and fire severity using the Random Forests algorithm applied to 1500 fires affecting 9.5 million hectares between 1984 and 2014 in pine (Pinus ponderosa, Pinus jeffreyi) and mixed-conifer forests of western United States, accounting for key topographic and climate variables. We found forests with higher levels of protection [from logging] had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading."

Lesmeister, D.B., et al. (co-authored by U.S. Forest Service). 2019. Mixed-severity wildfire and habitat of an old-forest obligate. Ecosphere10: Article e02696.

Denser, older forests with high canopy cover had lower fire severity.

Dunn, C.J., et al. 2020. How does tree regeneration respond to mixed-severity fire in the western Oregon Cascades, USA? Ecosphere 11: Article e03003.

Forests that burned at high-severity had lower, not higher, overall pre-fire tree densities.

Meigs, G.W., et al. (co-authored by U.S. Forest Service). 2020. Influence of topography and fuels on fire refugia probability under varying fire weather in forests of the US Pacific Northwest. Canadian Journal of Forest Research 50: 636-647.

Forests with higher pre-fire biomass are more likely to experience low-severity fire.

Moomaw et al. (2020) (letter from over 200 scientists:

https://johnmuirproject.org/2020/05/breaking-news-over-200-top-u-s-climate-and-forest- scientists-urge-congress-protect-forests-to-mitigate-climate-crisis/):

"Troublingly, to make thinning operations economically attractive to logging companies, commercial logging of larger, more fire-resistant trees often occurs across large areas. Importantly, mechanical thinning results in a substantial net loss

of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an example, logging in U.S. forests emits 10 times more carbon than fire and native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth."

Moomaw et al. (2021) (letter from over 200 scientists: https://bit.ly/3BFtIAg):

"[C]ommercial logging conducted under the guise of "thinning" and "fuel reduction" typically removes mature, fire-resistant trees that are needed for forest resilience. We have watched as one large wildfire after another has swept through tens of thousands of acres where commercial thinning had previously occurred due to extreme fire weather driven by climate change. Removing trees can alter a forest's microclimate, and can often increase fire intensity. In contrast, forests protected from logging, and those with high carbon biomass and carbon storage, more often burn at equal or lower intensities when fires do occur."

Lesmeister, D.B., et al. (co-authored by U.S. Forest Service). 2021. Northern spotted owl nesting forests as fire refugia: a 30-year synthesis of large wildfires. Fire Ecology 17: Article 32.

More open forests with lower biomass had higher fire severity, because the type of open, lower-biomass forests resulting from thinning and other logging activities have "hotter, drier, and windier microclimates, and those conditions decrease dramatically over relatively short distances into the interior of older forests with multi-layer canopies and high tree density..."

Stephens, S.L., et al. (co-authored by U.S. Forest Service). 2021. Forest Restoration and Fuels Reduction: Convergent or Divergent? BioScience 71: 85-101.

While the authors continued to promote commercial thinning, they acknowledged that commercial thinning causes wildfires to move faster and become larger more quickly:

"Interestingly, surface fire rate of spread increased after restoration and fuel treatments [commercial thinning] relative to the untreated stand. This increased fire rate of spread following both treatment types is due to a combination of higher mid-flame wind speeds and a greater proportion of grass fuels, which result from reductions to canopy cover."

Hanson, C.T. 2021. Is "Fuel Reduction" Justified as Fire Management in Spotted Owl Habitat? Birds 2: 395-403.

"Within the forest types inhabited by California Spotted Owls, high-severity fire occurrence was not higher overall in unmanaged forests and was not associated with the density of pre-fire snags from recent drought in the Creek Fire, contrary

to expectations under the fuel reduction hypothesis. Moreover, fuel-reduction logging in California Spotted Owl habitats was associated with higher fire severity in most cases. The highest levels of high-severity fire were in the categories with commercial logging (post-fire logging, private commercial timberlands, and commercial thinning), while the three categories with lower levels of high-severity fire were in forests with no recent forest management or wildfire, less intensive noncommercial management, and unmanaged forests with re-burning of mixed-severity wildfire, respectively."

Hanson, C.T. 2022. Cumulative severity of thinned and unthinned forests in a large California wildfire. Land 11: Article 373.

"Using published data regarding the percent basal area mortality for each commercial thinning unit that burned in the Antelope fire, combined with percent basal area mortality due to the fire itself from post-fire satellite imagery, it was found that commercial thinning was associated with significantly higher overall tree mortality levels (cumulative severity)."

Baker, B.C., and C.T. Hanson. 2022. Cumulative tree mortality from commercial thinning and a large wildfire in the Sierra Nevada, California. Land 11: Article 995.

"Similar to the findings of Hanson (2022) in the Antelope Fire of 2021 in northern California, in our investigation of the Caldor Fire of 2021 we found significantly higher cumulative severity in forests with commercial thinning than in unthinned forests, indicating that commercial thinning killed significant-

ly more trees than it prevented from being killed in the Caldor Fire...Despite controversy regarding thinning, there is a body of scientific literature that suggests commercial thinning should be scaled up across western US forest landscapes as a wildfire management strategy. This raises an important question: what accounts for the discrepancy on this issue in the scientific literature? We believe several factors are likely to largely explain this discrepancy. First and foremost, because most previous research has not accounted for tree mortality from thinning itself, prior to the wildfire-related mortality, such research has underreported tree mortality in commercial thinning areas relative to unthinned forests. Second, some prior studies have not controlled for vegetation type, which can lead to a mismatch when comparing severity in thinned areas to the rest of the fire area given that thinning necessarily occurs in conifer forests but unthinned areas can include large expanses of non-conifer vegetation types that burn almost exclusively at high severity, such as grasslands and chaparral. Third, some research reporting effectiveness of commercial thinning in terms of reducing fire severity has been based on the subjective location of comparison sample points between thinned and adjacent unthinned forests. Fourth, reported results have often been based on theoretical models, which subsequent research has found to overestimate the effectiveness of thinning. Last, several case studies draw conclusions about the effectiveness of thinning as a wildfire management strategy when the results of those studies do not support such a conclusion, as reviewed in DellaSala et al. (2022)." (internal citations omitted)

Prichard, S.J., et al. (co-authored by U.S. Forest Service). 2021. Adapting western US forests to wild-fires and climate change: 10 key questions. Ecological Applications 31: Article e02433.

In a study primarily authored by U.S. Forest Service scientists, and scientists funded by the Forest Service, the authors state that "There is little doubt that fuel reduction treatments can be effective at reducing fire severity..." yet these authors repeatedly contradict their own proposition, acknowledging that thinning can cause "higher surface fuel loads," which "can contribute to high-intensity surface fires and elevated levels of associated tree mortality," and mastication of such surface fuels "can cause deep soil heating" and "elevated fire intensities." The authors also acknowledge that thinning "can lead to increased surface wind speed and fuel heating, which allows for increased rates of fire spread in thinned forests," and even the combination of thinning and prescribed fire "may increase the risk of fire by increasing sunlight exposure to the forest floor, drying vegetation, promoting understory growth, and increasing wind speeds."

Despite these admissions, contradicting their promotion of thinning, the authors cite to several U.S. Forest Service-funded studies for the proposition that thinning can effectively reduce fire severity, but a subsequent analysis of those same studies found that the results of these articles do not support that conclusion, and often contradict it, as detailed in Section 5.2 of DellaSala et al. (2022) (see below).

DellaSala, D.A., B.C. Baker, C.T. Hanson, L. Ruediger, and W.L. Baker. 2022. Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus? Biological Conservation 268: Article 109499.

With regard to a previous U.S. Forest Service study claiming that commercial thinning effectively reduced fire severity in the large Wallow fire of 2011 in Arizona, DellaSala et al. (2022, Section 5.1) conducted a detailed accuracy check and found that the previous analysis had dramatically underreported high-severity fire in commercial thinning units, and forests with commercial thinning in fact had higher fire severity, overall.

DellaSala et al. (2022, Section 5.2) also reviewed several U.S. Forest Service studies relied upon by Prichard et al. (2021) for the claim that commercial thinning is an effective fire management approach and found that the actual results of these cited studies did not support that conclusion.

Bartowitz, K.J., et al. 2022. Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context. Front. For. Glob. Change 5: Article 867112.

The authors found that logging conducted as commercial thinning, which involves removal of some mature trees, substantially increases carbon emissions relative to wildfire alone, and commercial thinning "causes a higher rate of tree mortality than wildfire."

Evers, C., et al. 2022. Extreme Winds Alter Influence of Fuels and Topography on Megafire Burn Severity in Seasonal Temperate Rainforests under Record Fuel Aridity. Fire 5: Article 41.

The authors found that dense, mature/old forests with high biomass and canopy cover tended to have lower fire severity, while more open forests with lower canopy cover and less biomass burned more severely.

USFS (U.S. Forest Service) (2022). Gallinas-Las Dispensas Prescribed Fire Declared Wildfire Review. U.S. Forest Service, Office of the Chief, Washington, D.C.

"A thinning project in the burn area opened the canopy in some areas, allowing more sunlight which led to lower fuel moistures. Heavy ground fuels resulting from the construction of fireline for the burn project added to the fuel loading. This contributed to higher fire intensities, torching, spotting, and higher resistance-to-control."

The only effective way to protect homes from fire is home-hardening and defensible space pruning within 100 to 200 feet of homes or less.

Cohen, J.D. (U.S. Forest Service). 2000. Preventing disaster: home ignitability in the wildland- urban interface. Journal of Forestry 98: 15-21.

The only relevant zone to protect homes from wildland fire is within approximately 135 feet or less from each home—not out in wildland forests.

Gibbons P, van Bommel L, Gill MA, Cary GJ, Driscoll DA, Bradstock RA, Knight E, Moritz MA, Stephens SL, Lindenmayer DB (2012) Land management practices associated with house loss in wildfires. PLoS ONE 7: Article e29212.

Defensible space pruning within less than 130 feet from homes was effective at protecting homes from wildfires, while vegetation management in remote wildlands was not. A modest additional benefit for home safety was provided by prescribed burning less than 500 meters (less than 1641 feet) from homes.

Syphard, A.D., T.J. Brennan, and J.E. Keeley. 2014. The role of defensible space for residential structure protection during wildfires. Intl. J. Wildland Fire 23: 1165-1175.

Vegetation management and removal beyond approximately 100 feet from homes provides no additional benefit in terms of protecting homes from wildfires.

Tree removal is not necessary prior to conducting prescribed fire as an additional community safety buffer.

Decades of scientific studies have proven that, even in the densest forests that have not experienced fire in many decades, prescribed fire can be applied without prior tree removal, as demonstrated in the following studies:

Knapp EE, Keeley JE, Ballenger EA, Brennan TJ. 2005. Fuel reduction and coarse woody debris dynamics with early season and late season prescribed fire in a Sierra Nevada mixed conifer forest. Forest Ecology and Management 208: 383–397.

Knapp, E.E., and Keeley, J.E. 2006. Heterogeneity in fire severity within early season and late season prescribed burns in a mixed-conifer forest. Int. J. Wildland Fire 15: 37–45.

Knapp, E.E., Schwilk, D.W., Kane, J.M., Keeley, J.E., 2007. Role of burning on initial understory vegetation response to prescribed fire in a mixed conifer forest. Canadian Journal of Forest Research 37: 11–22.

van Mantgem, P.J., A.C. Caprio, N.L. Stephenson, and A.J. Das. 2016. Does prescribed fire promote resistance to drought in low elevation forests of the Sierra Nevada, California, USA? Fire Ecology 12: 13-25.

van Mantgem, P.J., N.L. Stephenson, J.J. Battles, E.K. Knapp, and J.E. Keeley. 2011. Long-term effects of prescribed fire on mixed conifer forest structure in the Sierra Nevada, California. Forest Ecology and Management 261: 989−994.

Please find DellaSala et al. (2015) attached.

Schoennagel et al (2004) states: “we are concerned that the model of historical fire effects and 20th-century fire suppression in dry ponderosa pine forests is being applied uncritically across all Rocky Mountain forests, including where it is inappropriate." Please find Schoennagel et al 2004 attached.

Schoennagel et al (2004) states: "High-elevation subalpine forests in the Rocky Mountains typify ecosystems that experience infrequent, high-severity crown fires []. . . The most extensive subalpine forest types are composed of Engelmann spruce (Picea engelmannii), subalpine fir (Abies lasiocarpa), and lodgepole pine (Pinus contorta), all thin- barked trees easily killed by fire. Extensive stand-replacing fires occurred historically at long intervals (i.e., one to many centuries) in subalpine forests, typically in association with infrequent high-pressure blocking systems that promote extremely dry regional climate patterns."

Schoennagel et al (2004) states: "it is unlikely that the short period of fire exclusion has significantly altered the long fire intervals in subalpine forests. Furthermore, large, intense fires burning under dry conditions are very difficult, if not im- possible, to suppress, and such fires account for the majority of area burned in subalpine forests.

Schoennagel et al (2004) states: “Moreover, there is no consistent relationship between time elapsed since the last fire and fuel abundance in subalpine forests, further undermining the idea that years of fire suppression have caused unnatural fuel buildup in this forest zone.”

Schoennagel et al (2004) states: “No evidence suggests that spruce–fir or lodgepole pine forests have experienced substantial shifts in stand structure over recent decades as a result of fire suppression. Overall, variation in climate rather than in fuels appears to exert the largest influence on the size, timing, and severity of fires in subalpine forests []. We conclude that large, infrequent stand replacing fires are ‘business as usual’ in this forest type, not an artifact of fire suppression.”.

Schoennagel et al (2004) states: “Contrary to popular opinion, previous fire suppression, which was consistently effective from about 1950 through 1972, had only a minimal effect on the large fire event in 1988 []. Reconstruction of historical fires indicates that similar large, high-severity fires also occurred in the early 1700s []. Given the historical range of variability of fire regimes in high-elevation subalpine fo- rests, fire behavior in Yellow-stone during 1988, although severe, was neither unusual nor surprising.”

Schoennagel et al (2004)(emphasis added) states: “Mechanical fuel reduction in sub- alpine forests would not represent a restoration treatment but rather a departure from the natural range of variability in stand structure.”

Schoennagel et al (2004) states: “Given the behavior of fire in Yellowstone in 1988, fuel reduction projects probably will not substantially reduce the frequency, size, or severity of wildfires under extreme weather conditions.”

Schoennagel et al (2004) states: “The Yellowstone fires in 1988 revealed that variation in fuel conditions, as measured by stand age and density, had only minimal influence on fire behavior. Therefore, we expect fuel reduction treatments in high-elevation forests to be generally unsuccessful in reducing fire frequency, severity, and size, given the overriding importance of extreme climate in controlling fire regimes in this zone. Thinning also will not restore subalpine forests, because they were dense historically and have not changed significantly in response to fire suppression. Thus, fuel reduction efforts in most Rocky Mountain sub-alpine forests probably would not effectively mitigate the fire hazard, and these efforts may create new ecological problems by moving the forest structure outside the historic range of variability.”

Likewise, Brown et al (2004) states: “At higher elevations, forests of subalpine fir, Engelmann spruce, mountain hemlock, and lodgepole or whitebark pine predominate. These forests also have long fire return intervals and contain a high proportion of fire sensitive trees. At periods averaging a few hundred years, extreme drought conditions would prime the- se forests for large, severe fires that would tend to set the fo- rest back to an early successional stage, with a large carry- over of dead trees as a legacy of snags and logs in the regenerating forest . . . . natural ecological dynamics are largely preserved because fire suppression has been effective for less than one natural fire cycle. Thinning for restoration does not appear to be appropriate in these forests. Efforts to manipulate stand structures to reduce fire hazard will not only be of limited effectiveness but may also move systems away from pre-1850 conditions to the detriment of wildlife and watersheds." "Fuel levels may suggest a high fire 'hazard' under conventional assessments, but wildfire risk is typically low in these settings."

Likewise, Graham et al (2004) states: “Most important, the fire behavior characteristics are strikingly different for cold (for ex- ample, lodgepole pine, Engelmann

spruce, subalpine fir), moist (for example, western hemlock, western redcedar, western white pine), and dry forests. Cold and moist forests tend to have long fire- return intervals, but fires that do occur tend to be high- intensity, stand-replacing fires. Dry forests historically had short intervals between fi- res, but most important, the fires had low to moderate severity.”

According to Graham et al (2004), thinning may also increase the likelihood of wildfire ignition in the type of forests in this Project area: “The probability of ignition is strongly related to fine fuel moisture content, air temperature, the amount of shad- ing of surface fuels, and the occurrence of an ignition source (human or lightning caused) . . . . There is generally a warmer, dryer microclimate in more open stands (fig. 9) compared to denser stands. Dense stands (canopy cover) tend to provide more shading of fuels, keep- ing relative humidity higher and air and fuel temperature lower than in more open stands. Thus, dense stands tend to maintain higher surface fuel moisture contents compared to more open stands. More open stands also tend to al- low higher wind speeds that tend to dry fuels compared to dense stands. These factors may increase probability of ignition in some open canopy stands compared to dense canopy stands."

A new study soon to be published by Dominick A. DellaSala et. al. found that re- viewed 1500 wildfires between 1984 and 2014 found that actively managed forests had the highest level of fire severity. While those forests in protected areas burned, on aver- age, had the lowest level of fire severity. In other words, the best way to reduce severe fires is to protect the land as wilderness, not "manage" it.

The Project will violate the NEPA if there are no valid snag sur- veys done for the project area both within and outside proposed harvest units.

The project will violate the NEPA if there are no valid surveys for old growth habitat within each project area, old growth types need to be defined and quantified by timber types, such as lodgepole pine, Douglas-fir, mixed conifer, spruce, subalpine fir, and limber pine.

Are you using the definition of old growth in the Forest Plan or Green et al. that the Regional Office has been asking forests to use?

The project will likely violate the NEPA if the mitigation measures for MIS, sensitive species, and Montana Species of Concern (birds, mammals including bats) are not clearly defined, and demonstrated to be effective as per the current best science.

We request a careful analysis of the impacts to fisheries and water quality, including considerations of sedimentation, in- creases in peak flow, channel stability, risk of rain on snow events, and increases in stream water temperature. Please disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities. Where livestock are permitted to graze, we ask that you assess the present condition and continue to monitor the

impacts of grazing activities upon vegetation diversity, soil compaction, stream bank stability and subsequent sedimentation. Livestock grazing occurs in the Project area and causes sediment impacts, trampled or destabilized banks, increased nutrient loads in streams, and decreased density, diversity, and function of riparian vegetation that may lead to in- creased stream temperatures and further detrimental impacts to water quality.

The Project will violate the NEPA if there are no valid snag surveys done for the project area both within and outside proposed harvest units.

The project will violate the NEPA if there are no valid surveys for old growth habitat within each project area, as identified by old growth types need to be defined and quantified by timber types, such as lodgepole pine, Douglas-fir, mixed conifer, spruce, subalpine fir, and limber pine.

The project will likely violate the NEPA if the mitigation measures for MIS, sensitive species, and Montana Species of Concern (birds, mammals including bats) are not clearly de- fined, and demonstrated to be effective as per the current best science.

FAILURE TO REVIEW AND PROTECT CULTURAL AND HISTORICAL RESOURCES

Consultation with the State Historic Preservation Office (SHPO) must be completed prior to a decision being signed.

Any required protection measures provided from SHPO will be incorporated into my final decision.

Crucial to the preservation of the historical and cultural foundations of the nation, Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 C.F.R. Part 800 (PDF) (revised August 5, 2004) require Federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties. Additionally, Federal agencies must provide the Advisory Council on Historic Preservation (ACHP) opportunity to comment on such projects prior to the agency's final decision.

A Federal project that requires review under Section 106 is defined as an "undertaking." An undertaking means a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval.

Section 110 of the NHPA

Added to the NHPA in 1992, Section 110 requires Federal agencies to emphasize the preservation and enhancement of cultural resources. Section 110 directs agencies to initiate measures necessary to direct their policies, plans, and pro- grams in such a way that federally-owned sites, structures, and objects of historical architectural or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the public. The agencies are also encouraged to institute (in consultation with the ACHP) procedures to assure Federal plans and programs contribute to the preservation and enhancement of non-Federally owned sites, structures, and objects of historical, architectural, and archaeological significance. Has the MT SHPO received this survey? The cultural surveys need to be done before the NEPA and NHPA process can be completed, which has not occurred. The project must be approved by the SHPO and the public needs to given a chance to comment on this.

Did the Forest Service conduct NEPA analysis (i.e. an EA or EIS) for the Fire Plan the Forest is using for this project? If you don't the project will be in violation of NEPA, NFMA, and the APA.

Please provide a map showing the Wildland Urban Interface (WUI) and the locations of all homes in comparison to the project area.

Does the WUI comply with the statutory definition of theWUI under the Healthy Forest Restoration Act?

Please demonstrate that there is an emergency that this requires this project.

If the Forest Service did not conduct NEPA for the Fire Plan, please disclose the cumulative effects of Forest-wide implementation of the Fire Plan in the project EIS, or EA if you refuse to write an EIS, to avoid illegally tiering to a non NEPA document. Specifically analyze the decision to prioritize mechanical, human-designed, somewhat arbitrary treatments as a replacement for naturally-occurring fire.

Did the Forest Service conduct ESA consultation for the Fire Plan?

Is the Forest Service be considering binding legal standards for noxious weeds in its revision of the Lolo Forest Plan?

How effective have BMPs been at stopping (i.e. preventing) new weed infestations from starting during logging and related road operations?

Is it true that new roads are the number one cause of new noxious weed infestations?

Why isn't the Forest Service considering a Forest Plan amendment in this Project to amend the Forest Plan to include binding legal standards that address noxious weeds?

Is it true that noxious weeds are one of the top threats to biodiversity on our National Forests?

How can the Forest Service be complying with NFMA's requirement to maintain biodiversity if it has no legal standards that address noxious weeds?

Will this Project address all Project area BMP needs, i.e. will the BMP road maintenance backlog and needs from this Project all be met by this Project?

The scoping notice was not clear if any MIS were found. What MIS did you find, how many and how did you look for these MIS?

How will the decreased elk security and thermal cover affect wolverines? Please formally consult with the US FWS on the impact of this project on wolverines. The U.S. District Court ordered the USFWS to reconsider if wolverines should be listed untie ESA. Wolverines need secure habitat in big game winter range.

Which wildlife species and ecosystem processes, if any, does the fire-proofing in the proposed project benefit? Which species and processes do fire-proofing harm?

What is your definition of healthier?

What evidence do you have that this logging will make the forest healthier for fish and wildlife? What about the role of mixed severity and high severity fire – what are the benefits of those natural processes?

How have those processes (mixed and high severity fire) created the ecosystems we have today?

Over how many millennia have mixed and high severity fire have been occurring without human intervention?

What beneficial ecological roles do beetles play? You didn't answer this in violation of NEPA, NFMA and the APA.

Can the forest survive without beetles?

Will all WQLS streams in the project area have completed TMDLs before a decision is signed?

Will this project leave enough snags to follow the Forest Plan requirements and the requirements of sensitive old growth species such as flammulated owls and goshawks?

Will this Project exacerbate existing noxious weed infestations and start new infestations?

Do unlogged old growth forests store more carbon than the wood products that would be removed from the same forest in a logging operation?

What is the cumulative effect of National Forest logging on U.S. carbon stores? How many acres of National Forest lands are logged every year? How much carbon is lost by that logging?

Is this Project consistent with "research recommendations (Krankina and Harmon 2006) for protecting carbon gains against the potential impacts of future climate change? That study recommends “[i]ncreasing or maintaining the forest area by avoiding deforestation,” and states that “protecting forest from logging or clearing offer immediate benefits via prevented emissions.”

Please list each visual quality standard that applies to each unit and disclose whether each unit meets its respective visual quality standard.

Please disclose whether you have conducted surveys in the Project area for this Project for whitebark pine, wolverines, pine martins, grizzly bears, bull trout, northern goshawk and lynx, as required by the Forest Plan and the ESA.

Please disclose the last time the Project area was surveyed for whitebark pine, wolverines, pine martins, northern goshawk, bull trout, grizzly bears, and lynx. Holbrook 2019 (attached) found that all lynx habitat has to be surveyed.

Please disclose how often the Project area has been surveyed for whitebark pine, wolverines, pine martins, northern goshawks, and lynx.

Would the habitat be better for whitebark pine, wolverines, pine martins, northern goshawks, and lynx if roads were removed in the Project area?

Has the Lolo National Forest eliminated or reduced any lynx analysis units (LAUs) in the project area without taking public comment?

Please provide us with the full BA for the whitebark pine, wolverines, monarch butterflies, grizzly bears, bull trout, bull trout critical habitat, pine martins, northern goshawks, and lynx.

Please provide us with a survey for all of the whitebark pine in the project area.

Weeds

Native plants are the foundation upon which the ecosystems of the Forest are built, providing forage and shelter for all native wildlife, bird and insect species, supporting the natural processes of the landscape, and providing the

context within which the public find recreational and spiritual opportunities. All these uses or values of land are hindered or lost by conversion of native vegetation to invasive and noxious plants. The ecological threats posed by noxious weed infestations are so great that a former chief of the Forest Service called the invasion of noxious weeds "devastating" and a "biological disaster." Despite implementation of Forest Service "best management practices" (BMPs), noxious weed infestation on the Forest is getting worse and noxious weeds will likely overtake native plant populations if introduced into areas that are not yet infested. The Forest Service has recognized that the effects of noxious weed invasions may be irreversible. Even if weeds are eliminated with herbicide treatment, they may be replaced by other weeds, not by native plant species.

Invasive plant species, also called noxious weeds, are one of the greatest modern threats to biodiversity on earth. Noxious weeds cause harm because they displace native plants, resulting in a loss of diversity and a change in the structure of a plant community. By removing native vegetative cover, invasive plants like knapweed may increase sediment yield and surface runoff in an ecosystem. As well knapweed may alter organic matter distribution and nutrient through a greater ability to uptake phosphorus over some native species in grasslands. Weed colonization can alter fire behavior by increasing flammability: for example, cheatgrass, a widespread noxious weed on the Forest, cures early and leads to more frequent burning. Weed colonization can also deplete soil nutrients and change the physical structure of soils.

The Forest Service's own management activities are largely responsible for noxious weed infestations; in particular, logging, prescribed burns, and road construction and use create a risk of weed infestations. The introduction of logging equipment into the Forest creates and exacerbates noxious weed infestations. The removal of trees through logging can also facilitate the establishment of noxious weed infestations because of soil disturbance and the reduction of canopy closure In general, noxious weeds occur in old clearcuts and forest openings, but are rare in mature and old growth forests. Roads are often the first place new invader weeds are introduced. Vehicle traffic and soil disturbances from road construction and maintenance create ideal establishment conditions for weeds. Roads also provide obvious dispersal corridors. Roadsides throughout the project area are infested with noxious weeds. Once established along roadsides, invasive plants will likely spread into adjacent grass- lands and forest openings.

Prescribed burning activities within the analysis area would likely cumulatively contribute to increases to noxious weed distribution and populations. As a disturbance process, fire has the potential to greatly exacerbate infestations of certain noxious weed species, depending on burn severity and habitat type (Fire Effects Information System 2004). Soil disturbance, such as that resulting from low and moderate burn severities from prescribed fire and fire suppression related disturbances (dozer lines, drop spots, etc.), provide optimum conditions for noxious weed invasion. Dry site vegetation types and road corridors are extremely vulnerable, especially where recent ground disturbance (timber management, road construction) has occurred. Units proposed for burning within project area may have closed forest service access roads (jammers) located within units. These units have the highest potential for noxious weed infestation and exacerbation through fire activities. Please provide an alternative that eliminates units that have noxious weeds present on roads within units from fire management proposals.

Please address the ecological, social and ascetic impact of current noxious weed infestations within the project area. Include an analysis of the impact of the actions proposed by this project on the long and short term spread of current and new noxious weed infestations. What treatment methods will be used to address growing noxious weed problems? What noxious weeds are currently and historically found within the project area? Please include a map of current noxious weed infestations which includes knapweed, Saint Johnswort, cheat grass, bull thistle, Canada thistle, hawkweed, hound's-tongue, oxeye daisy and all other Category 1, Category 2 and Category 3 weeds classified as noxious in the MONTANA COUNTY NOXIOUS

WEED LIST. State-listed Category 2 noxious weed species yellow and orange hawkweeds are recently established (within the last 5 to 10 years) in Montana and are rapidly expanding in established areas. They can invade undisturbed areas where native plant communities are intact. These species can persist in shaded conditions and often grow underneath shrubs making eradication very difficult. Their stoloniferous (growing at the surface or below ground) habit can create dense mats that can persist and spread to densities of 3500 plants per square mile (Thomas and Dale 1975). Are yellow and orange hawkweeds present within the project area?

Please address the cumulative, direct and indirect effects of the proposed project on weed introduction, spread and persistence that includes how weed infestations have been and will be influenced by the following management actions: road construction including new permanent and temporary roads and skid trails proposed within this project; opening and decommissioning of roads represented on forest service maps; ground disturbance and traffic on forest service template roads, mining access routes, and private roads; removal of trees through commercial and pre-commercial logging and understory thinning; and prescribed burns. What open, gated, and decommissioned Forest Service roads within the project area proposed as haul routes have existent noxious weed populations and what methods will be used to assure that noxious weeds are not spread into the proposed action units?

Noxious weeds are not eradicated with single herbicide treatments. A onetime application may kill an individual plant but dormant seeds in the ground can still sprout after herbicide treatment. Thus, herbicides must be

used on consistent, repetitive schedules to be effective.

What commitment to a long-term, consistent strategy of application is being proposed for each weed infested area wi- thin the proposed action area? What long term monitoring of weed populations is proposed?

When areas treated with herbicides are reseeded on national forest land, they are usually reseeded with exotic grasses, not native plant species. What native plant restoration activities will be implemented in areas disturbed by the actions proposed in this project? Will disturbed areas including road corridors, skid trails, and burn units be planted or reseeded with native plant species?

The scientific and managerial consensus is that prevention is the most effective way to manage noxious weeds. The Forest Service concedes that preventing the introduction of weeds into uninfested areas is "the most critical component of a weed management program." The Forest Service's national management strategy for noxious weeds also recommends "develop[ing] and implement[ing] forest plan standards . . . ." and recognizes that the cheapest and most effective solution is prevention. Which units within the project area currently have no noxious weed populations within their boundaries? What minimum standards are in the Lolo National Forest Plan to address noxious weed infestations? Please include an alternative in the DEIS that includes land management standards that will prevent new weed infestations by addressing the causes of weed infestation. The failure to include preventive standards violates NFMA because the Forest Service is not ensuring the protection of soils and native plant communities. Additionally, the omission of an EIS alternative that includes preventive measures would violate NEPA because the Forest Service would fail to consider a reasonable alternative.

Rare Plants

The ESA requires that the Forest Service conserve endangered and threatened species of plants as well as animals. In addition to plants protected under the ESA, the Forest Service identifies species for which population viability is a concern as “sensitive species” designated by the Regional Forester (FSM 2670.44). The response of each of the sensitive plant species to management activity varies by species, and in some cases, is not fully known. Local native vegetation has evolved with and is adapted to the climate, soils, and natural processes such as fire, insect and disease infestations, and windthrow. Any management or lack of management that causes these natural processes to be altered may have impacts on native vegetation, including threatened and sensitive plants. Herbicide application – intended to eradicate invasive plants – also results in a loss of native plant diversity because herbicides kill native plants as well as invasive plants.

Whitebark Pine

Not all ecosystems or all Rocky Mountain landscapes have experienced the impacts of fire exclusion. In some wilderness areas, where in recent decades natural fires have been allowed to burn, there have not been major shifts in vegetation composition and structure (Keane et al. 2002). In some alpine ecosystems, fire was never an important ecological factor. In some upper subalpine ecosystems, fires were important, but their rate of occurrence was too low to have been significantly altered by the relatively short period of fire suppression (Keane et al. 2002).

For example, the last 70 to 80 years of fire suppression have not had much influence on subalpine landscapes with fire intervals of 200 to several hundred years (Romme and Despain).

Consequently, it is unlikely that fire exclusion has yet to significantly alter stand conditions or forest health within Rocky Mountain subalpine ecosystems.

Whitebark pine seedlings, saplings and mature trees, present in subalpine forests proposed for burning, would experience mortality from project activity. Whitebark pine is fire intolerant (thin bark). Fire favors whitebark pine regeneration (through canopy opening and reducing competing vegetation) only in the presence of adequate seed source and dispersal mechanisms (Clarks Nutcracker or humans planting whitebark pine seedlings).

White pine blister rust, an introduced disease, has caused rapid mortality of whitebark pine over the last 30 to 60 years. Keane and Arno (1993) reported that 42 percent of whitebark pine in western Montana had died in the previous 20 years with 89 percent of remaining trees being infected with blister rust. The ability of whitebark pine to reproduce naturally is strongly affected by blister rust infection; the rust kills branches in the upper cone bearing crown, effectively ending seed production.

Montana is currently experiencing a mountain pine beetle epidemic. Mountain pine beetle prefer large, older whitebark pine, which are the major cone producers. In some areas the few remaining whitebark that show the potential for blister rust resistance are being at- tacked and killed by mountain pine beetles, thus accelerating the loss of key mature cone- bearing trees.

Whitebark pine seedlings and saplings are very likely present in the subalpine forests proposed for burning and logging. In the absence of fire, this naturally occurring white- bark pine regeneration would continue to function as an important part of the subalpine ecosystem. Since 2005, rust resistant seed sources have been identified in the Northern Rockies (Mahalovich et al 2006). Due to the severity of blister rust infection within the region, natural whitebark pine regeneration in the project area is prospective rust resistant stock.

Although prescribed burning can be useful to reduce areas of high-density subalpine fir and spruce and can create favorable ecological conditions for whitebark pine regeneration and growth, in the absence of sufficient seed source for natural regeneration maintaining the viability and function of whitebark pine would not be achieved through burning. Please find Keane and Parsons and Keane 2017 attached.

Planting of rust-resistant seedlings would likely not be sufficient to replace whitebark pine lost to fire activities.

What surveys have been conducted to determine presence and abundance of whitebark pine re-generation? If whitebark pine seedlings and saplings are present, what measures will be taken to protect them? Please include an alternative that excludes burning in the presence of whitebark pine regeneration (consider 'Daylighting' seedlings and saplings as an alternative restoration method). Will restoration efforts include planting whitebark pine? Will planted seedling be of rust-resistant stock? Is rust re-sistant stock available? Would enough seedlings be planted to replace whitebark pine lost to fire activities? Have white pine blister rust surveys been accompli- shed? What is the severity of white pine blister rust in proposed action areas?

Does the Lolo N.F. have any forest plan biological assessment, biological opinion, incidental take statement, and management direction amendment for whitebark pine?

How will this project protect, maintain, and restore whitebark pine?

Will any of the clearcuts or openings be bigger than 40 acres?

If so please take public comment on the impact of openings over 40 acres.

Please formally consult with the US FWS on the impact of the project on whitebark pine.

Please formally consult with the US FWS on the LNF forest plan since whitebark pine were listed after the forest plan was signed.

Does the LNF have any forest plan biological assessment, biological opinion, incidental take statement, and management direction amendment for whitebark pine?

Please see the attached paper by Six et al 2021 Whitebark Genetics 2021. Six et al. found:

"Anthropogenic change is creating or enhancing a number of stressors on forests. To aid forests in adapting to these stressors, we need to move beyond traditional spacing and age- class prescriptions and take into account the genetic variability within and among populations and the impact our actions may have on adaptive potential and forest trajectories. Because so little is known about the genetic diversity in most forest trees, and because it is key to effective conservation, studies of genetic diversity and structuring in forest trees should be a top priority in forest adaptation and conservation efforts."

The project is not following the best available science and is not meeting the purpose and need. Since Whitebark pine are listed under the ESA, you must formally reconsult with the FWS on the impact of the project on whitebark pine. To do this the Forest Service will need to have a complete and recent survey of the entire project area for whitebark pine and consider planting whitebark pine as the best available science by Keene et al. states is the only way to get new whitebark pine to grow.

Do spruce beetle effect whitebark pine?

In some areas the few remaining whitebark that show the potential for blister rust resistance are being attacked and killed by mountain pine beetles, thus accelerating the loss of key mature cone- bearing trees. Whitebark pine seedlings and saplings are very likely present in the subalpine forests proposed for burning and logging. In the absence of fire, this naturally occurring white- bark pine regeneration would continue to function as an important part of the subalpine ecosystem.

Since 2005, rust resistant seed sources have been identified in the Northern Rockies (Mahalovich et al 2006). Due to the severity of blister rust infection within the region, natural whitebark pine regeneration in the project area is prospective rust resistant stock. Although prescribed burning can be useful to reduce areas of high-density subalpine fir and spruce and can create favorable ecological conditions for whitebark pine regeneration and growth, in the absence of sufficient seed source for natural re-generation maintaining the viability and function of whitebark pine would not be achieved through burning. Please find Keane and Arno attached. Planting of rust-resistant seedlings would likely not be sufficient to replace whitebark pine lost to fire ac-tivities. What surveys have been conducted to determine pres-ence and abundance of whitebark pine re-generation?

Since Whitebark pine are listed under the ESA, the USFS-USDA must formally reconsult with the USFWS on the impact of the project on whitebark pine. To do this the Forest Service will need to have a complete and recent survey of the entire project area for the presence of whitebark pine and consider planting whitebark pine as the best available science. Keene et al. states that the only way to get new whitebark pine is to grow (seedlings) them (submitted in our DEA comments).

Hundreds of acres of clearcutting and burning threaten individ-ual whitebark pine trees in the project area, including miles and miles of new roads, and including clearings around individual whitebark pines. The Forest Service fails to disclose the level of "take" and the incredibly high failure rate of these practices as a technique for natural restoration, regeneration and recovery of whitebark pine under these conditions.

The Forest Service does not disclose or address the results of its only long-term study on the effects of tree cutting and burning on whitebark pine. This study, named "Restoring Whitebark Pine Ecosystems," included prescribed fire, “thinning”, “selection cuttings,” and “fuel enhancement cuttings” on multiple different sites. The results were that “[a]s with all the other study results, there was very little whitebark pine regeneration observed on these plots.” See U.S. Forest Service, General Technical Report RMRS-GTR- 232 (January 2010). These results directly undermine the representations the Forest Service makes in the Project EIS. More specifically, the Forest Service’s own research at RMRS-GTR-232 finds: “the whitebark pine regeneration that was expected to result from this [seed] caching [in new openings] has not yet materialized. Nearly all sites contain very few or no whitebark pine seedlings.” Thus, even ten years after cutting and burning, regeneration was “marginal.” Moreover, as the Forest Service notes on its website: “All burn treatments resulted in high mortality in both whitebark pine and subalpine fir (over 40%).” Accordingly, the only proven method of restoration of whitebark pine is planting: “Manual planting of whitebark pine seedlings is required to adequately restore these sites.”

Therefor the project’s plan to cut down trees around whitebark pine will cause the whitebark pine to grow faster and then die from beetles. This is a violation of NEPA, NFMA, the APA and the ESA.

Please see the attached memo from the FWS about requirements for consulting with the FWS about whitebark pine now that they are listed as threatened.

For whitebark pine, spring or fall burning may kill seedlings susceptible to fire. For mature whitebark pine trees, the bark is relatively thin compared to other species such as ponderosa pine and susceptible to scorching from fire. Fires that approach the tree trunks may scorch the bark, diminishing the bark's protective properties from other stressors. Depending on the fireline intensity and residence time of lethal temperatures, the heat from the fire may also penetrate the bark, killing the underlying cambium layer. Harm to the bark and cambium may reduce individual tree vigor and also increase susceptibility to infections such as white pine blister rust or infestations by the mountain pine beetle.Whitebark pine seed banks and fine roots may also be impacted should fire move through an area when fuels and soil moisture is conducive to longer residence time of lethal temperatures. Seeds are buried by Clark's nutcrackers generally within one inch of the soil surface and may be susceptible to longer residence time of lethal temperatures. Fine roots located near the soil surface serve as the primary water absorbing roots for trees and may be harmed or killed with longer residence times of lethal temperatures when soil moisture is low which would lead to an increase in the penetration depth of lethal temperatures. In general, the proposed prescription would attempt to achieve a low severity surface fire in which shrubs, needle cast and upper duff layers would be consumed. In some instances, including dense stands in which commercial or non-commercial thinning is not feasible, higher severity fire effects may be preferred to achieve the desired condition for those forested stands.In the long term, broadcast burning in the vicinity of living whitebark pine stands may improve the habitat suitability for seed caching by Clark's nutcracker; seed germination; and whitebark pine seedling establishment. Clark's nutcrackers prefer to cache seeds in recently burned areas as fire removes understory plants and creates soils surfaces that are easier to penetrate for seed caching. In addition, in the long term, broadcast burning may reduce the vigor of other species that would compete with whitebark pine seedlings for sunlight, soil water, and nutrients."

Whatebark pine are now a threatened species and the project is in violation of the ESA.

On December 2, 2020, the U.S. Fish and Wildlife Service issued a rule proposing to list whitebark pine (Pinus albicaulis) under the Endangered Species Act. The Project area includes whitebark pine. The whitebark pine present in the project area represents a major source within the larger geographic area. The Project proposes tree cutting and burning across thousands of acres where whitebark pine may be present. Regardless of whether individual activities are intended to im-pact whitebark pine, whitebark pine may be affected by damage from equipment and equipment trails, cutting, soil compaction and disturbance, mortality from prescribed burning, scorching from jackpot burning, trampling of seedlings and saplings, and removal of necessary microclimates and nursery trees needed for sapling survival. Additionally, thousands of acres of whitebark pine habitat manipulation are proposed for the Project, including intentionally cutting and burning Whitebark pine trees. No discussion on the success rate of natural regeneration under these conditions is provided. No discussion of the success rate of planting seedlings in clearcuts is provided. There have been no surveys for whitebark pine in violation of the ESA, NEPA, NFMA, and the APA.

The Forest Service admits that whitebark pine is known to be present in the area and that the Project "may impact individuals. . . ." The Forest Service further admits: "some ad-

verse impacts are possible.” The Forest Service further admits that “implementation of the project may cause incidental loss of whitebark pine seedlings and saplings . . . .” Crucially, the Forest Service does not disclose or address the re- sults of its only long-term study on the effects of tree cutting and burning on white-bark pine. This study, named “Restoring Whitebark Pine Ecosystems,” included prescribed fire, thinning, selection cut-tings, and fuel enhancement cuttings on multiple different sites. The results were that “[a]s with all the other study results, there was very little whitebark pine regeneration ob- served on these plots.” See U.S. Forest
Service, General Technical Report RMRS-GTR-232 (January 2010). More specifically: “the whitebark pine regeneration that was expected to result from this [seed] caching [in new open-ings] has not yet materialized. Nearly all sites contain very few or no whitebark pine seedlings.” Thus, even ten years after cut-ting and burning, regeneration was “marginal.” Moreover, as the Forest Service notes on its website: “All burn treatments result-ed in high mortality in both whitebark pine and subalpine fir (over 40%).” Accordingly, the only proven method of restoration of whitebark pine is planting: “Manual planting of whitebark pine seedlings is required to adequately restore these sites.”

The agency is violating the NEPA by promoting fuel reduction projects as protection of the public from fire, when this is actual-ly a very unlikely event; the probability of a given fuel break to actually have a fire in it before the fuels reduction benefits are lost with conifer regeneration are extremely remote; forest drying and increased wind speeds in thinned forests may increase, not reduce, the risk of fire.

The agency is violating the NEPA by providing false reasons for logging to the public by claiming that insects and disease in forest stands are detrimental to the forest by reducing stand vigor (health) and increasing fire risk. There is no cur- rent science that demonstrates that insects and disease are bad for wildlife, including dwarf mistletoe, or that these increase the risk of fire once red needles have fallen.

The agency is violating the NEPA by claiming that logging is needed to create a diversity of stand structures and age classes; this is just agency rhetoric to conceal the real purpose of logging to the public.

The agency is violating the NEPA by using vague, unmeasureable terms to rationalize the proposed logging to the public.

How can the public measure “resiliency?” Please demonstrate that fuel breaks work.

a. When ladder fuels are removed (by thinning), ground-level wind speed and turbulent mixing both increase, leading to faster fire spread and greater oxygen- transport efficiency; this, in turn, results in increased fire intensity.

b. In many cases this aerodynamic effect is more important than the fire-dampening effects of the fuels reduction being evaluated.

c. Two recent studies demonstrate just how consequential neglecting canopy wind-drag effects can be, leading to potentially disastrous results if aggressive ladder-fuel removal is applied. See Atchley et al. 2021 (attached), and Banerjee et al. 2020 (attached).

d. Both papers demonstrate that the removal of ladder fuels reduces the sub-canopy wind drag, ultimately leading to increased fire spread.

e. In other words, they both show how fuels-reduction treatments can increase fire spread, which is the opposite of what currently-used operational model studies predict.

f. Furthermore, the Banerjee et al. 2020 paper goes further and also shows that aggressive ladder fuel removal increases the likelihood of overstory crown fires compared to more modest ladder fuel reductions, which is again opposite to operational model-run predictions.

g. Other recent studies also confirm these findings. Cohen et al. 2018 (attached) demonstrate that drought and fuel load were secondary effects compared to fire-induced atmospheric motions, which operational fire-behavior models neglect.

h. Bradley et al. (2016) (attached) analyzed satellite data for 1500 fires from 1984 to 2014, affecting 23.5 million acres of forestland. Their results show that the more heavily forestland is managed, the more severely it burns, and the least-managed land (i.e., our National Parks and Wilderness Areas) are the most firesafe.

i. By omitting atmospheric dynamics and wind-drag effects associated with vegetation treatments, fuels reductions designed to reduce fire intensity and fire spread are undoubtedly producing the opposite effect.

Please find A More Effective Approach for Preventing Wildland-Urban Fire Disasters Jack Cohen attached.

Please see the following article titled:

Montana researchers urge towns to focus on wildfire preparation

https://missoulacurrent.com/research-wildfire-preparation/

Laura Lundquist

(Missoula Current) For more than a decade, a small group of scientists have been trying to convince people that fireproofing

their homes is far more effective than logging the forest when it comes to surviving wildfire. But few people are listening.

In mid-December, six researchers published a paper in the Proceedings of the National Academy of Sciences journal warning that communities across the nation, but particularly those in the West, aren't prepared to survive an urban conflagration such as the one that devastated Lahaina, Hawaii, in August.

The paper, titled "Wildland-urban fire disasters aren't actually a wildfire problem," points out that, since 2016, communities from Lahaina to Gatlinburg, Tenn., that have lost hundred of homes to fires have certain things in common: the fires occurred under extreme weather conditions - high winds and persistent drought - and most of the structures weren't fire-resistant.

"These problem fires were defined as an issue of wildfires that involved houses. In reality, they are urban fires initiated by wildfires. That's an important distinction - and one that has big repercussions for how we prepare ourselves for future fires," the authors wrote.

The authors included three researchers from the Forest Science and Fire Sciences laboratories of the U.S. Forest Service Rocky Mountain Research Station in Missoula and one from Headwaters Economics in Bozeman.

In a 2014 paper in the Proceedings of the National Academy of Science, some of the same authors developed a community risk *assessment that put the focus on improving the security of individual homes in a community, not the forest around them.*

The emphasis is placed on modifying the house and the home ignition zone, a region within 100 feet of a house where debris and vegetation should be eliminated or minimized to reduce the chance of fire getting close to the house.

The reason that urban conflagrations begin and spread is because wind pushes embers and heat from one unprotected building to another, overwhelming fire departments that normally train to fight fire in just one building. Conditions are made worse when buildings are close together, because radiant heat becomes a bigger factor, spreading fire quicker.

"Reducing the likelihood that a home will ignite interrupts the disaster sequence by enabling effective structure protection. New construction siting, design, construction materials, and landscaping requirements should take wildfire potential into account," the authors wrote in the December paper.

One of the paper's authors, Jack Cohen, is a fire-behavior analyst and heat transfer engineer who has spent 40 years investigating wildfires, particularly those that are linked to incidents where hundreds of homes burned. He has spent at least the past decade writing papers and giving talks about the need to focus on making homes less susceptible to wildfires, which are a natural process, especially in the arid West.

When asked why the researchers decided to submit the recent article that seeks to drum home points they already promoted a *decade ago, Cohen said cities and agencies have done very little during that time period to put their recommendations into place.*

"What prompted us this time was the Lahaina urban conflagration that was associated with a grassfire. It may be a repeated message on our part, but it's not being received very well. Not much has changed," Cohen said. "The federal and state agencies still don't get it - they're still defining the problem as a wildfire control problem."

Since the 2014 paper, Cohen and other researchers have had to just watch as town after town has burned terribly but predictably, as if no one has read their research. In Gatlinburg and Pigeon Forge, Tenn., 2,460 buildings burned in a 2016 fire; in 2018, the Camp Fire led to the loss of almost 19,000 buildings in Paradise, Calif.; in December 2021, 1,084 buildings burned in Superior and Louisville, Colo. from a grass fire; and in November 2021, a grassfire sparked fires in 23 homes in Denton, Mont.

Each wildfire had very little connection to most of the burning buildings, Cohen said. A wildfire is the source of initial ignition, but from that point on, it's a series of structure fires that lead to more structure fires. For example, with the Four Mile Canyon Fire in Boulder, Colo., the state of Colorado and the Forest Service had completed a number of fuel treatments nearby that they touted as protective. But high winds carried fire brands to ignite the houses far from the fire. Cohen found that while 168 houses burned, a lot of vegetation around the houses didn't, "so the wildfire didn't sweep through town."

"In the past five years, a number of incidents with more than 100 houses burning have been initiated by grass fires, which burn quickly. The grass fires pass through and are gone while the community continued to burn," Cohen said. "What I've found, particularly over the past five or six years, is that extreme wildfire is not dependent on closed-canopy conifers that produce big flames. The only time these urban disasters occur is under extreme conditions. That typically means it's very windy."

Nothing about the Lahaina Fire surprised Cohen. Not even the overblown claims that a wildfire "roared through and destroyed the town." Again, the wildfire was over before the town really started to burn. The fire started as a grassfire fanned by high winds, and had Lahaina not been there, the fire would have burned through the buffel grass and guinea grass within a matter of minutes before it died out on the beach.

But Lahaina was there, a high-density community with several blocks of multi-story, largely-connected wooden structures. That configuration caused buildings to catch fire either due to burning embers flying from other buildings or from catching fire due to the overwhelming heat from nearby buildings.

"The ignition initiated where the grassfire came down, and that was it - it was a conflagration," Cohen said. "You don't want to be in a high-density community when you can't control the fire. Thirteen of the 26 fatalities in the 1991 Oakland Hills Fire occurred in the street when two-story buildings were burning on both sides of the street and the road became blocked. The heat was untenable."

One house in Lahaina stood untouched and was dubbed "the miracle house." But Cohen said it was just a good example of the points he and his fellow authors have been trying to communicate about defensible space and being fire-adapted. The owners had recently renovated the house with a nonflammable roof. It had wood walls, but the nearest building was about 30 feet away - far enough to prevent radiant heat from starting a fire - and there was little debris on the grounds or the house to actively spread the fire.

"The home ignition zone works," Cohen said. "The home ignition zone came out of the modeling I did and then the crown fire experiments I did with wood walls to show the distance, the proximity required to produce an ignition was realistic. At the same time, California was cutting 300-foot clearances around communities, which means nothing to (airborne) burning embers, but it's way over (what's required) for radiant heat exposure."

Cohen and his colleagues hope their latest paper prompts more action from local governments. Cohen is hoping Missoula County can do a better job when it updates its Wildfire Protection Plan in the near future.

But more than likely, Cohen said, they'll be writing a similar paper in another few years, trying to make politicians and the public understand. It doesn't help that they're fighting some in their own agency, the Forest Service, who insist that logging, not home modification, will save communities.

“Fire is inevitable. But nobody’s figuring it out,” Cohen said. “We’re starting from the presumption that it’s wildfire that spreads through a community that lays it to waste. We even have the agencies responding in that fashion by being obsessed with this notion of wildfire control. So they do fuel treatments to have safe firefighting. That’s not only counter ecologically, it doesn’t work.”

Contact reporter Laura Lundquist at lundquist@missoulacurrent.com.

Please find the paper Cohen co-authored that is mention in the article above, Calkin et al. 2024 attached.

Based on Calkin’s paper, the project is not an emergency and not following the best available science.

What are the specific criteria used to define resiliency, and what are the ratings for each proposed logging unit before and after treatment? How is the risk of fire as affected by the project being measured so that the public can understand whether or not this will be effective? How is forest health to be measured so that the public can see that this is a valid management strategy? What specifically constitutes a diversity of age classes, how is this to be measured, and how are proposed changes measured as per diversity? How are diversity measures related to wildlife (why is diversity needed for what species)? If the reasons for logging cannot be clearly identified and measured for the public, the agency is not meeting the NEPA requirements for transparency.

The agency will violate the Forest Plan by logging riparian areas; almost all wildlife species will be harmed by this treatment.

The agency will violate the NFMA by failing to ensure that old growth forests are well-distributed across the landscape with the all of the its projects.

Please include an easily understandable accounting of all costs for the various types of treatments, including burning. For commercial logging, fuels reduction, and prescribed burning, we would like to know what the estimated cost is “per acre” for that particular treatment. We would also like to know the costs for construction of new temporary roads, reconstruction of existing roads, and road obliteration and/or decommissioning per mile of road.

The U.S. District Court just ruled that the Forest Service has to formally consult with the U.S. FWS on the Northern Rockies Lynx Management Direction effect on lynx and lynx critical habitat. Have you done this? If not please do so.

THE AGENCIES MUST REINITIATE

CONSULTATION ON THE NORTHERN ROCKIES LYNX MANAGEMENT DIRECTION.

The Northern Rockies Lynx Management Direction is inadequate to ensure conservation and recovery of lynx. The amendments fail to use the best available science on necessary lynx habitat elements, including but not limited to, failing to include standards that protect key winter habitat.

The Endangered Species Act requires the FS to insure that the these project are not likely to result in the destruction or adverse modification of critical habitat. 16 U.S.C. §1536(a) (2). Activities that may destroy or adversely modify critical habitat are those that alter the physical and biological features to an extent that appreciably reduces the conservation value of critical habitat for lynx. 74 Fed. Reg. 8644. The Northern Rockies Lynx Management Direction (NRLMD) as applied in the project violates the ESA by failing to use the best available science to insure no adverse

modification of critical habitat. The NRLMD carves out exemptions from Veg Standards

S1, S2, S5, and S6. In particular, fuel treatment projects may occur in the WUI even though they will not meet standards Veg S1, S2, S5, or S6, provided they do not occur on more than 6% of lynx habitat on each Nation- al Forest. Allowing the agency to destroy or adversely modify any lynx critical habitat has the potential to appreciably reduce the conservation value of such habitat. The agency cannot simply set a cap at 6% forest-wide without looking at the individual characteristics of each LAU to determine whether the project has the potential to appreciably reduce the conservation value. The ESA requires the use of the best available science at the site-specific level. It does not allow the agencies to make a gross determination that al- lowing lynx critical habitat to be destroyed forest-wide while not appreciably reduce the conservation value.

The FS violated NEPA by applying the above-mentioned excep- tion without analyzing the impacts to lynx in the individual LAUs. The Project violates the NFMA by failing to in- sure the viability of lynx. Ac- cording to the 1982 NFMA regulations, fish and wildlife must be managed to maintain vi- able popula- tions of Canada lynx in the planning area. 36 C.F.R. 219.19. The FS has not shown that lynx will be well distributed in the plan- ning area. The FS has not addressed how the project's adverse modification of denning and foraging habitat will impact distri- bution. This is important because the agency readily admits that the LAUs already contain a “relatively large percentage of unsuitable habitat.”

The national forests subject to this new direction will provide habitat to maintain a viable population of lynx in the northern Rockies by maintaining the current distribution of occupied lynx habitat, and maintaining or enhancing the quality of that habitat.

The FS cannot insure species viability here without addressing the impacts to the already low amount of suitable habitat. By cutting in denning and foraging habitat, the agency will not be “maintaining or enhancing the quality of the habitat.”

This project is in Canada lynx habitat. In order to meet the requirements of the FS/USFWS Conservation Agreement, the FS agreed to insure that all project activities are consistent with the Lynx Conservation Assessment and Strategy (LCAS) and the requirements of protecting lynx critical habitat. The FS did not do so with its project analysis. This project will adversely affect lynx critical habitat in violation of the Endangered Species Act. The BA/BE needs to be rewritten to reflect this information to determine if this project will adversely modify proposed critical habitat for lynx and if so conference with USFWS.

The Lolo National Forest (LNF) is home to the Canada lynx, and lynx critical habitat. Canada lynx are listed as a Threatened species under the Endangered Species Act (ESA). In December 1999, the Forest Service and Bureau of Land Management completed their "Biological Assessment Of The Effects Of National Forest Land And Resource Management Plans And Bureau Of Land Management Land Use Plans On Canada Lynx" (Programmatic Lynx BA). The Programmatic Lynx BA concluded that the cur- rent programmatic land management plans "may affect, and are likely to adversely affect, the subject population of Canada lynx."

The Lynx BA team recommended amending or revising Forest Plans to incorporate conservation measures that would reduce or eliminate the identified adverse effects on lynx. The Programmatic Lynx BA's determination means that Forest Plan implementation is a "taking" of lynx, and makes Section 7 formal consultation on the Lolo Forest Plan mandatory, before actions such as the proposed project are approved.

Continued implementation of the Forest Plan constitutes a "taking" of the lynx. Such taking can only be authorized with an incidental take statement, issued as part of a Biological Opinion (B.O.) during of Section 7 consultation. The Lolo National Forest must incorporate terms and conditions from a programmatic B.O. into a Forest Plan amendment or revision before projects affecting lynx habitat, such as this one, can be authorized.

The Programmatic Lynx BA's "likely to adversely affect" conclusion was based upon the following rationale. Plans within the Northern Rockies:

• Generally direct an aggressive fire suppression strategy within developmental land allocations. ...this strategy may be contributing to a risk of adversely affecting the lynx by limiting the availability of foraging habitat within these areas.

• Allow levels of human access via forest roads that may present a risk of incidental trapping or shooting of lynx or access by other competing carnivores. The risk of road-related adverse effects is primarily a winter season issue.

• Are weak in providing guidance for new or existing recreation developments. There- fore, these activities may contribute to a risk of ad- verse effects to lynx.

• Allow both mechanized and non-mechanized recreation that may contribute to a risk of adverse effects to lynx. The potential effects occur by allowing compacted snow trails and plowed roads which may facilitate the movements of lynx competitors and predators.

• Provide weak direction for maintaining habitat connectivity within naturally or artificially fragmented landscapes. Plans within all geographic areas lack direction for coordinating construction of highways and other movement barriers with other responsible agencies. These factors may be contributing to a risk of adverse effects to lynx.

• Are weak in providing direction for coordinating management activities with adjacent landowners and other agencies to assure consistent management of lynx habitat across the landscape. This may contribute to a risk of adverse effects to lynx.

• Fail to provide direction for monitoring of lynx, snowshoe hares, and their habitats. While failure to monitor does not directly result in adverse effects, it makes the detection and assessment of adverse effects from other management activities difficult or impossible to attain.

• Forest management has resulted in a reduction of the area in which natural ecological processes were historically allowed to operate, thereby increasing the area potentially affected by known risk factors to lynx. The Plans have continued this trend. The Plans have also continued the process of fragmenting habitat and

reducing its quality and quantity. Consequently, plans may risk adversely affect- ing lynx by potentially contributing to a reduction in the geographic range of the species.

• The BA team recommends amending or revising the Plans to incorporate conservation measures that would reduce or eliminate the identified adverse effects to lynx. The programmatic conservation measures listed in the Canada Lynx Conservation Assessment and Strategy (LCAS) should be considered in this regard, once finalized. (Programmatic Lynx BA, at 4.)

The Programmatic Lynx BA notes that the LCAS identifies the following risk factors to lynx in this geographic area:

- Timber harvest and pre-commercial thinning that reduce denning or foraging habitat or converts habitat to less desirable tree species

- Fire exclusion that changes the vegetation mosaic maintained by natural disturbance processes

- Grazing by domestic livestock that reduces forage for lynx prey

What are the redd counts in bull trout critical habitat in the project area? Please also provide the all the historical bull counts that you have in the project area?

The NEPA analysis must fully and completely analyze the impacts to bull trout critical habitat and westslope cutthroat trout habitat. What is the standard for sediment in the Forest Plan? Sediment is one of the key factors impacting water quality and fish habitat. [See USFWS 2010]

The introduction of sediment in excess of natural amounts can have multiple adverse effects on bull trout and their habitat (Rhodes et al. 1994, pp. 16-21; Berry, Rubinstein, Melzian, and Hill 2003, p. 7). The effect of sediment beyond natural background conditions can be fatal at high levels. Embryo survival and subsequent fry emergence
success have been highly correlated to percentage of fine material within the stream-bed (Shepard et al. 1984, pp. 146, 152). Low levels of sediment may result in sublethal and behavioral effects such as increased activity, stress, and emigration rates; loss or reduction of foraging capability; reduced growth and resistance to disease; physical abrasion; clogging of gills; and interference with orientation in homing and migration (McLeay et al. 1987a, p. 671; Newcombe and MacDonald 1991, pp. 72, 76, 77; Barrett, Grossman, and Rosenfeld 1992, p. 437; Lake and Hinch 1999, p. 865; Bash et al. 2001n, p. 9; Watts et al. 2003, p. 551; Vondracek et al. 2003, p. 1005; Berry, Rubinstein, Melzian, and Hill 2003, p. 33). The effects of increased suspended sediments can cause changes in the abundance and/or type of food organisms, alterations in fish habitat, and long-term impacts to fish populations (Anderson et al.

1996, pp. 1, 9, 12, 14, 15; Reid and Anderson 1999, pp. 1, 7-15). No threshold has been determined in which fine sediment addition to a stream is harmless (Suttle et al. 2004, p. 973). Even at low concentrations, fine-sediment deposition can decrease growth and survival of juvenile salmonids.

Aquatic systems are complex interactive systems, and isolating the effects of sediment to fish is difficult (Castro and Reckendorf 1995d, pp. 2-3). The effects of sediment on receiving water ecosystems are complex and multi-dimensional, and further compounded
by the fact that sediment flux is a natural and vital process for aquatic systems (Berry, Rubinstein, Melzian, and Hill 2003, p. 4). Environmental factors that affect the magnitude of sediment impacts on salmonids include duration of exposure, frequency of exposure, toxicity, temperature, life stage of fish, angularity and size of particle, severity/magnitude of pulse, time of occurrence, general condition of biota, and availability of and access to refugia (Bash et al. 2001m, p. 11). Potential impacts caused by excessive suspended sediments are varied and complex and are often masked by other concurrent activities (Newcombe 2003, p. 530). The difficulty in determining which environmental variables act as limiting factors has made it difficult to establish the specific effects of sediment impacts on fish (Chapman 1988, p. 2). For example, excess fines in spawning gravels may not lead to smaller populations of adults if the amount of juvenile winter habitat limits the number of juveniles that reach adulthood. Often there are multiple

independent variables with complex inter-relationships that can influence population size.

The ecological dominance of a given species is often determined by environmental variables. A chronic input of sediment could tip the ecological balance in favor of one species in mixed salmonid populations or in species communities composed of salmonids and nonsalmonids (Everest et al. 1987, p. 120). Bull trout have more spatially restrictive biological requirements at the individual and population levels than other salmonids (USFWS (U.S. Fish and Wildlife Service) 1998, p. 5). Therefore, they are especially vulnerable to environmental changes such as sediment deposition.

Aquatic Impacts

• Classify and analyze the level of impacts to bull trout and westslope cutthroat trout in streams, rivers and lakes from sediment and other habitat alterations:

Lethal: Direct mortality to any life stage, reduction in egg-to-fry survival, and loss of spawning or rearing habitat. These effects damage the capacity of the bull trout to produce fish and sustain populations.

Sublethal: Reduction in feeding and growth rates, decrease in habitat quality, reduced tolerance to disease and toxicants, respiratory impairment, and physiological stress. While not leading to immediate death, may produce mortalities and population decline over time.

Behavioral: Avoidance and distribution, homing and migration, and foraging and predation. Behavioral effects change the activity patterns or alter the kinds of activity usually associated with an unperturbed environment. Behavior effects may lead to immediate death or population decline or mortality over time.

Direct effects:
Gill Trauma - High levels of suspended sediment and turbidity can result in direct mortality of fish by damaging and clogging gills (Curry and MacNeill 2004, p. 140).

Spawning, redds, eggs - The effects of suspended sediment, deposited in a redd and potentially reducing water flow and smothering eggs or alevins or impeding fry emergence, are related to sediment particle sizes of the spawning habitat (Bjornn and Reiser 1991, p. 98).

Indirect effects:
Macroinvertebrates - Sedimentation can have an effect on bull trout and fish populations through impacts or alterations to the macroinvertebrate communities or populations (Anderson, Taylor, and Balch 1996, pp. 14-15).

Feeding behavior - Increased turbidity and suspended sediment can affect a number of factors related to feeding for salmonids, including feeding rates, reaction distance, prey selection, and prey abundance (Barrett, Grossman, and Rosenfeld 1992, pp.

437, 440; Henley, Patterson, Neves, and Lemly 2000, p. 133; Bash et al. 2001d, p. 21).

Habitat effects - All life history stages are associated with complex forms of cover including large woody debris, undercut banks, boulders, and pools. Other habitat characteristic important to bull trout include channel and hydrologic stability, substrate composition,
temperature, and the presence of migration corridors (Rieman and McIntyre 1993, p. 5).

Physiological effects - Sublethal levels of suspended sediment may cause undue physiological stress on fish, which may reduce the ability of the fish to perform vital functions (Cederholm and Reid 1987, p. 388, 390).

Behavioral effects - These behavioral changes include avoidance of habitat, reduction in feeding, increased activity, redistribution and migration to other habitats and locations, disruption of territoriality, and altered homing (Anderson, Taylor, and Balch 1996, p. 6; Bash et
al. 2001t, pp. 19-25; Suttle, Power, Levine, and McNeely 2004, p. 971).

• How will this project affect native fish and bull trout critical habitat? What is the current condition in the riparian areas? How will this project protect rather than adversely impact fish habitat and water quality? No logging or road building should be done in riparian areas. There should not be any stream crossings. Roads should be decommissioned and removed, not upgraded and rebuilt.

• Hauer, et al. (1999) found that bull trout streams in wilderness habitats had consistent ratios of large to small and attached to unattached large woody debris. However, bull trout streams in watersheds with logging activity had substantial variation in these ratios. They identified logging as creating the most substantive change in stream habitats.

“The implications of this study for forest managers are twofold: (i) with riparian logging comes increased unpredictability in the frequency of size, attachment, and stability of the LWD and (ii) maintaining the appropriate ratios of size frequency, orientation, and bank
attachment, as well as rate of delivery, storage, and transport of LWD to streams, is essential to maintaining historic LWD characteristics and dynamics. Our data suggest that exclusion of logging from riparian zones may be necessary to maintain natural stream
morphology and habitat features. Likewise, careful upland management is also necessary to prevent cumulative effects that result in altered water flow regimes and sediment delivery regimes. While not specifically evaluated in this study, in general, it appears that
patterns of upland logging space and time may have cumulative effects that could additionally alter the balance of LWD delivery, storage, and transport in fluvial systems.

These issues will be critical for forest managers attempting to prevent future detrimental environmental change or setting restoration goals for degraded bull trout spawning streams."

Muhlfeld, et al. (2009) evaluated the association of local habitat features (width, gradient, and elevation), watershed characteristics (mean and maximum summer water temperatures, the number of road crossings, and road density), and biotic factors (the distance to the source of hybridization and trout density) with the spread of hybridization between native westslope cutthroat trout Oncorhynchus clarkii lewisi and introduced rainbow trout O. mykiss in the upper
Flathead River system in Montana and British Columbia.

They found that hybridization was positively associated with mean summer water temperature and the number of upstream road crossings and negatively associated with the distance to the main source of hybridization. Their results suggest that hybridization is more likely to occur and spread in streams with warm water temperatures, increased land use disturbance, and proximity to the main source of hybridization.

The NEPA analysis must use the best available science to analyze how logging riparian habitat will impact native fish and water quality.

The following article from the 9/25/15 Missoulian disagrees with the Forest Service and says it is habitat destruction causing bull trout declines.

http://missoulian.com/news/local/montana-fwp-biologist-despite-successes-bull-trout-populations-still-in/article_2798e4c6-0658-522f-be4c-4274f903129e.html

Montana FWP biologist: Despite successes, bull trout populations still in peril
Ladd Knotek is disturbed by the lack of attention being paid to the many western Montana streams where bull trout populations are struggling to survive.

The fisheries biologist with Montana Fish, Wildlife and Parks knows people love to latch on to the success stories from streams like Fish Creek and several Blackfoot tributaries, where bull trout populations are viable.

"But what nobody talks about is all these other populations that, 50 years ago, these were all viable populations," he said Tuesday as part of a presentation on bull trout in Rattlesnake Creek. "You know, Gold Creek, Belmont Creek, Trout Creek, there's a whole list of them. There's a whole bunch of them that are just basically on the verge of disappearing. And what we like to talk about are the ones that are doing OK. But in places like Lolo Creek and some Bitterroot tributaries, bull trout there are just barely

hanging on.”

Bull trout have faced a long, slow decline over the past century, to the point where they are now listed as a threatened species under the Endangered Species Act. Success is a relative term even in the places where they are doing well.

“They’re nowhere near what they were historically,” Knotek said of the tributaries where the populations are relatively healthy. “But they have a fair number of adult spawners coming in. People see them in the fishery. But we need to start looking at all these other tributaries that used to be bull trout spawning tributaries and recognize what’s going on in the bigger picture. We’re just looking at a very thin slice instead of looking at the whole thing. A lot of this stuff is just symptoms of what’s going on at the larger scale. Bull trout are the canary. They’re very susceptible to environmental change, whether it’s temperature, whether it’s physical, whether it’s sediment. There’s something going on in these drainages and the symptoms we’re seeing are the bull trout distribution is shrinking, we’re losing populations and we’re seeing expansion of nonnatives.”

Bull trout – which are native to the Columbia River Basin and are only found west of the Continental Divide in Montana – need clear, cold mountain waters to spawn and require clean gravel beds, deep pools, complex cover, good *in-stream flows in the fall and large systems of interconnected waterways for their migrations. Rising temperatures and falling water levels trigger their migration to spawning tributaries in June, and they hang out until they spawn in the fall. They are much more susceptible to warming temperatures and habitat change than nonnative species such as brown and rainbow trout.*

Knotek was the featured presenter Friday for a discussion on restoration efforts and the importance of Rattlesnake Creek as a bull trout habitat. The event was organized by the Clark Fork Coalition, a nonprofit in Missoula that aims to protect water quality for the 22,000-square-mile Clark Fork River Basin.

Knotek explained that because Rattlesnake Creek is south-facing and doesn't have much groundwater recharging, it has much less of a buffer against a warming climate than other streams.

"The water temperatures are significantly higher than they were 10 years ago," he said. "The types of temperatures we're seeing in late summer and early fall, we never saw those 10 to 15 years ago. Water temperature is driving a lot of what we're talking about. It's definitely stressful on fish. It doesn't spell good news for bull trout."

Knotek said it's a common misconception that brown trout and rainbows are driving out bull trout, and he explained that those nonnative species are simply moving in because the native species is dying off.

"It's replacement rather than displacement," he said.

In Rattlesnake Creek, biologists have conducted redd counts of the migratory population in the lower reaches since 1999. There is a healthy resident population in the upper reaches, but researchers are more interested in the fish that actually migrate to the Clark Fork River.

The results have been disturbing.

They found a high of 36 in 2006 and 24 in 2008, before Milltown Dam was removed. There was an expected drop to just four redds – spawning beds – after the dam was removed in 2009, because of the massive disturbance. However, the number of redds has not bounced back since, and researchers found just six last year.

"That tells us that it wasn't just the dam removal that caused it, because they should be recovering by now," Knotek said. "And there are lots of populations like this stream that are not doing well but need more attention. We've got a problem here, but it's not inconsistent with other tributaries. There's something bigger going on."

Knotek said that Rattlesnake Creek was historically braided before the area was developed, and that eliminated a lot of the back channels the juvenile fish need to grow.

"You need complexity," he said. "When you have a straight ditch in a system that used to be braided, it ain't good."

He's also seen much more algae growth in the upper sections, something that is obviously related to higher temperatures and added nutrients.

"We have browns and rainbows progressing upstream, and we attribute that to water temperature," he said. "That's consistent with other streams, too. It's very obvious something is going on here."

Knotek believes that a "ramping up" of current conservation work is the only thing that can save bull trout populations. Fish screens, the removal of dams, awareness of anglers and water conservation – especially by people using stream irrigation to water their lawns – is crucial.

"Bull trout are the canary," he said. "But there are a lot of other species that we could be looking at as indicators as well. A lot of research needs to be done. There's a lot of

species being affected."

As Knoteck pointed out, bull trout need clear, cold mountain waters to spawn and require clean gravel beds, deep pools, complex cover, good in-stream flows in the fall and large systems of interconnected waterways for their migrations.

What is the total amount of sediment currently going into the streams in the project area? How much will the project increase sediment? How will the project affect bull trout habitat and bull trout critical habitat? How many bull trout will be killed during the implementation of the project?

How will the Tyler's Kitchen project make the waters clearer in the short term?

How will the Tyler's Kitchen project make the waters colder in the short term?

How will the Tyler's Kitchen project make the gravel beds of the streams int he project area cleaner in the short and long term?

How will the Tyler's Kitchen project make the affect deep pools in streams in the project area in the short and long term?

How will the Tyler's Kitchen project make the affect complex cover over the streams in the project area in the short and long term?

How will the Tyler's Kitchen project make the affect the in-stream flows in the fall in the short and long term?

How will the Tyler's Kitchen project make the affect large systems of interconnected waterways for bull trout migrations?

Critical habitat receives protection under section 7 of the Endangered Species Act through the prohibition against destruction or adverse modification of critical habitat with regard to actions carried out, funded, or authorized by a Federal agency. There is no exception for the short run? How long is the project scheduled to last?

Will this project adversely modify bull trout critical habitat in the short run?

How will the Tyler's Kitchen project affect the temperature of the streams in the project area including bull trout critical habitat?

Will all of the proposed logging increase the temperature of the streams in the project area?

Will all of the proposed road building and road use by log truck, clearcutting, and other logging put more sediment into streams in the project area?

How will this affect bull trout and bull trout critical habitat?

When was the last time the project area was surveyed for bull trout?

What was the results of these surveys?

The EA does not characterize or evaluate the project area watersheds based on the Watershed Condition Framework or the baseline condition developed for bull trout. We do not know what the current condition of streams are in the project area, i.e., are they functioning acceptably, at risk or at unacceptable risk? And for what ecosystem parameters? How will this project affect stream function, i.e., degrade, maintain, restore?

- The project relies on BMPs to protect water quality and fish habitat. First, there is no evidence that application of BMPs actually protects fish habitat and water quality.
- Second, BMPs are only maintained on a small percentage of roads or when there is a logging project.

BMPs fail to protect and improve water quality because of the allowance for “naturally occurring degradation.” In Montana, “naturally-occurring degradation” is defined in ARM 16.20.603(11) as that which occurs after application of “all reasonable land, soil and water conservation practices have been applied.” In other words, damage caused directly by sediment (and other pollution) is acceptable as long as BMPs are applied. The result is a never-ending, downward spiral for water quality and native fish. Here’s how it works:

- Timber sale #1 generates sediment damage to a bull trout stream, which is “acceptable” as long as BMPs are applied to project activities.
- “Natural” is then redefined as the stream condition after sediment damage caused by Timber Sale #1.
- Timber sale #2 – in the same watershed – sediment damage would be acceptable if BMPs are applied again – same as was done before.
- “Natural” is again redefined as the stream condition after sediment damage caused by Timber Sale#2.

The downward spiral continues with disastrous cumulative effects on bull trout, westslope cutthroat trout and most aquatic life. BMPs are not “reasonable.” Clearly, beneficial uses are not being protected. In Montana, state water quality policy is not being followed. § 75-5-101 et seq. and ARM 16.20.701 et seq.

The U.S. Fish and Wildlife Service found that bull trout are exceptionally sensitive to the direct, indirect, and cumulative effects of roads. Dunham and Rieman demonstrated that disturbance from roads was associated with reduced bull trout occurrence. They concluded that conservation of bull trout should involve protection of larger, less fragmented, and less disturbed (lower road density) habitats to maintain important strongholds and sources for naturally recolonizing areas where populations have been lost. (USFS 2000, page 3-82.

Hitt and Frissell showed that over 65% of waters that were rated as having high aquatic biological integrity were found within wilderness-containing subwatersheds.

Trombulak and Frissell concluded that the presence of roads in an area is associated with negative effects for both terrestrial and aquatic ecosystems including changes in species composition and population size. (USFS 2000, pages 3-80-81).

"High integrity [forests] contain the greatest proportion of high forest, aquatic, and hydrologic integrity of all are dominated by wilderness and roadless areas [and] are the least altered by management. Low integrity [forests have] likely been altered by past management are extensively roaded and have little wilderness." (USFS 1996a, pages 108, 115 and 116).

"Much of this [overly dense forest] condition occurs in areas of high road density where the large, shade-intolerant, insect-, disease- and fire-resistant species have been harvested over the past 20 to 30 years. Fires in unroaded areas are not as severe as in the roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in the unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. In general, the effects of wildfires in these areas are much lower and do not result in the chronic sediment delivery hazards exhibited in areas that have been roaded." (USFS 1997a, pages 281-282).

"Increasing road density is correlated with declining aquatic habitat conditions and aquatic integrity An intensive review of the literature concludes that increases in sedimentation [of streams] are unavoidable even using the most cautious roading methods." (USFS 1996b, page 105).

"This study suggests the general trend for the entire Columbia River basin is toward a loss in pool habitat on managed lands and stable or improving conditions on unmanaged lands." (McIntosh et al 1994).

"The data suggest that unmanaged systems may be more structurally intact (i.e., coarse woody debris, habitat diversity, riparian vegetation), allowing a positive interaction with the stream processes (i.e., peak flows, sediment routing) that shape and maintain high-quality fish habitat over time." (McIntosh et al 1994).

"Although precise, quantifiable relationships between long-term trends in fish abundance and land-use practices are difficult to obtain (Bisson et al. 1992), the body of literature concludes that land-use practices cause the simplification of fish habitat." (McIntosh et al 1994).

"Land management activities that contributed to the forest health problem (i.e., selective harvest and fire suppression) have had an equal or greater effect on aquatic ecosystems.

If we are to restore and maintain high quality fish habitat, then protecting and restoring aquatic and terrestrial ecosystems is essential." (McIntosh et al 1994).

"Native fishes are most typically extirpated from waters that have been heavily modified by human activity, where native fish assemblages have already been depleted, disrupted, or stressed []." (Moyle et al 1996).

"Restoration should be focused where minimal investment can maintain the greatest area of high-quality habitat and diverse aquatic biota. Few completely roadless, large watersheds remain in the Pacific Northwest, but those that continue relatively undisturbed are critical in sustaining sensitive native species and important ecosystem processes (Sedell, et. al 1990; Moyle and Sato 1991; Williams 1991; McIntosh et al. 1994;

Frissell and Bayles 1996). With few exceptions, even the least disturbed basins have a road network and history of logging or other human disturbance that greatly magnifies the risk of deteriorating riverine habitats in the watershed." (Frissell undated).

"[A]llocate all unroaded areas greater than 1,000 acres as Strongholds for the production of clean water, aquatic and riparian-dependent species. Many unroaded areas are isolated, relatively small, and most are not protected from road construction and subsequent timber harvest, even in steep areas. Thus, immediate protection through allocation of the unroaded areas to the production of clean water, aquatic and riparian-dependent resources is necessary to prevent degradation of this high quality habitat and should not be postponed." (USFWS et al 1995).

"Because of fire suppression, timber harvest, roads, and white pine blister rust, the moist forest PVG has experienced great changes since settlement of the project area by Euroamericans. Vast amounts of old forest have converted to mid seral stages."(USFS/BLM 2000, page 4-58).

"Old forests have declined substantially in the dry forest PVG []. In general, forests showing the most change are those that have been roaded and harvested. Large trees, snags, and coarse woody debris are all below historical levels in these areas."

(USFS/BLM 2000, page 4-65).

"High road densities and their locations within watersheds are typically correlated with areas of higher watershed sensitivity to erosion and sediment transport to streams. Road density also is correlated with the distribution and spread of exotic annual grasses, noxious weeds, and other exotic plants. Furthermore, high road densities are correlated with areas that have few large snags and few large trees that are resistant to both fire and infestation of insects and disease. Lastly, high road densities are correlated with areas that have relatively high risk of fire occurrence (from human caused fires), high hazard ground fuels, and high tree mortality." (USFS 1996b, page 85, parenthesis in original).

In simpler terms, the Forest Service has found that there is no way to build an environmentally benign road and that roads and logging have caused greater damage to forest ecosystems than has the suppression of wildfire alone. These findings indicate that roadless areas in general will take adequate care of themselves if left alone and unmanaged, and that concerted reductions in road densities in already roaded areas are absolutely necessary.

Indeed, other studies conducted by the Forest Service indicate that efforts to “manage" our way out of the problem are likely to make things worse. By "expanding our efforts in timber harvests to minimize the risks of large fire, we risk expanding what are well established negative effects on streams and native salmonids. The perpetuation or expansion of existing road networks and other activities might well erode the ability of [fish] populations to respond to the effects of large scale storms and other disturbances that we clearly cannot change." (Reiman et al 1997).

The following quotes demonstrate that trying to restore lower severity fire regimes and forests through logging and other management activities may make the situation worse, compared to allowing nature to reestablish its own equilibrium. These statements are found in “An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins, Volume 3 (ICBEMP):

“Since past timber harvest activities have contributed to degradation in aquatic ecosystems, emphasis on timber harvest and thinning to restore more natural forests and fire regimes represent risks of extending the problems of the past.” (ICBEMP page 1340).

“Proposed efforts to reduce fuel loads and stand densities often involve mechanical treatment and the use of prescribed fire. Such activities are not without their own drawbacks -- long-term negative effects of timber harvest activities on aquatic ecosystems are well documented (see this chapter; Henjum and others 1994; Meehan 1991; Salo and Cundy 1987).” (ICBEMP page 1340).

“Species like bull trout that are associated with cold, high elevation forests have probably persisted in landscapes that were strongly influenced by low frequency, high severity fire regimes. In an evolutionary sense, many native fishes are likely well acquainted with large, stand-replacing fires." (ICBEMP page 1341).

"Attempts to minimize the risk of large fires by expanding timber harvest risks expanding the well-established negative effects on aquatic systems as well. The perpetuation or expansion of existing road networks and other activities might well erode the ability of populations to respond to the effects of fire and large storms and other disturbances that we cannot predict or control (National Research Council 1996). (ICBEMP page 1342).

"Watersheds that support healthy populations may be at greater risk through disruption of watershed processes and degradation of habitats caused by intensive management than through the effects of fire." (ICBMP page 1342).

"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity. If not accompanied by adequate reduction of fuels, logging (including salvage of dead and dying trees) increases fire hazard by increasing surface dead fuels and changing the local microclimate. Fire intensity and expected fire spread rates thus increase locally and in areas adjacent to harvest". (USFS 1996c, pages 4-61-72).

"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes...As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. Even though these hazards diminish over time, their influence on fire behavior can linger for up to 30 years in dry forest ecosystems of eastern Oregon and Washington". (Huff et al 1995).

The answer, therefore, is not to try managing our way out of this situation with more roads and timber harvest/management. In summary:

• Roads have adverse effects on aquatic ecosystems. They facilitate timber sales which can reduce riparian cover, increase water temperatures, decrease recruitment of coarse woody debris, and disrupt the hydrologic regime of watersheds by changing the timing and quantity of runoff. Roads themselves disrupt hydrologic processes by intercepting and diverting flow and contributing fine sediment into the stream channels which clogs spawning gravels. High water temperatures and fine sediment degrade native fish spawning habitat.

According to the U.S. Forest Service 82% of all bull trout populations and stream segments range-wide are threatened by degraded habitat conditions. Roads and forest management are a major factor in the decline of native fish species on public lands in the Northern Rockies and Pacific Northwest.

- An open road density (ORD) of one mile per square mile of land reduces elk habitat effectiveness to only 60% of potential. When ORD increases to six miles per square mile, habitat effectiveness for elk decreases to less than 20%. (Lyon 1984).

What is the open and total motorized and route density in the project area? The desired range is less than 1.7 miles/mile^2 (Christensen et al. 1993)."

- Black bears in southern Appalachia begin avoiding Forest Service roads when the density exceeds 0.8 miles per square mile. (Brody 1984). Grizzly bears use habitats less than expected when ORD exceeds one mile per square mile and total road density (TRD) exceeds two miles per square mile. (Mace and Manley 1993). Open roads contribute to grizzly bear mortality by poaching and, especially during the black bear hunting season, by mistaken killing. (Holland 1985).

How will the project effect grizzly bears since the project area is a travel corridor for grizzly bears?

Hillary Cooley, the Fish and Wildlife Service's grizzly bear recovery coordinator has stated that a grizzly bear recently denned in the project area and gave birth to 3 cubs. Please make sure your analysis reflects this.

New roadbuilding in the Forest without meaningful reclamation to ensure no net increase in the road system presents a significant threat to grizzly bears, because motor vehicle users and other people recreating can trespass on the supposedly "impassable" roads and thus encroach on grizzly bear habitat. Further, even unused roads cause detrimental impacts to grizzly bear survival and reproduction, because grizzly bears are displaced from roaded habitat, regardless of whether the roads receive public or administrative use. However, in concluding that the Forest Plan will not jeopardize the species, FWS's Revised Biological Opinion failed to adequately examine adverse impacts to grizzly bears from unauthorized motorized use on roads closed according to the Forest Plan's weaker closure standards; failed to consider the displacement impacts caused by roads even when they do not receive motorized use; and failed to account for increased roadbuilding enabled by the Forest Service's abandonment of stringent road-reclamation requirements.

Please find attached the paper titled, “The importance of natural forest stewardship in adaptation planning in the United States” by Faison et al 2023 which found that protecting more forests with natural stewardship is a cost effective way to harness the inherent adaptation and mitigation powers in forests and ensure that they are at their most functional to regulate planetary processes. Which is the opposite of the purpose and need of this project.

Habitat type

Please do not dismiss the importance of the following information relating to Pfister, et al. (1977).

The scoping notice states on of the purposes of the project is to:

- Promote ponderosa pine and western larch.

What is the habitat type of the project area?

Quote from Pfister et al. (1977):
RESEARCH SUMMARY

A land-classification system based upon potential natural vegetation is presented for the forests of Montana. It is based on an intensive 4-year study and reconnaissance sampling of about 1,500 stands. A hierarchical classification of forest sites was developed using the habitat type concept. A total of 9 climax series, 64 habitat types, and 37 additional phases of habitat types are defined. A diagnostic key is provided for field identification of the types based on indicator

species used in development of the classification. In addition to site classification, descriptions of mature forest communities are provided with tables to portray the ecological distribution of all species. Potential productivity for timber, climatic characteristics, and surface soil characteristics are also described for each type. Preliminary implications for natural resource management are provided, based on field observations and current information.

FOREST HABITAT TYPES OF MONTANA, Robert D. Pfister,
Bernard L. Kovalchik,
Stephen F. Amo, and Richard C. Presby
INTERMOUNTAIN FOREST AND RANGE EXPERIMENT STATION
Forest Service-U. S. Department of Agriculture
Ogden, Utah 84401 (hereafter, Pfister, et al. (1977), or Pfister)

Pfister et al. (1977) established a new, and vastly improved, forest classification system which further developed the application of habitat type classification to forest ecosystem classification. A better classification system for forest communities and the characteristics of the specific site locations upon which forest vegetation develop and depend.

The habitat type approach to classification of forest sites was developed more than 20 years ago by Daubenmire (1952) for forests of northern Idaho and eastern Washington. His original classification, and a subsequent revision and J. Daubenmire 1961, have proven useful in forest management and research

(Laysex 1974; Pfister 1976). Id. p.1
In 2022, Pfister et al. is considered the “best available science” in this field (old growth and old-growth habitat) of study. It is often, to this day, spoken fondly of as “The Bible” for habitat-type classification, a detailed expression of the overall environment, ie. an ecological classification. There is, quite simply, no better system in existence being
used for interpreting the ecological potential of the forested landscapes of Montana and the Northern Rockies. Federal land managers attempting to make intelligent prescriptions for managing/manipulating forest vegetation should, and must use Pfister’s habitat type classifications as the foundation of forest ecosystem analysis.

Pfister is foundational; it is the ground upon which forest ecology and ecosystem science rests. There is no substitute, and any and all attempts to truncate, or compartmentalize elements within Phister’s holistic, habitat-type classification system, represents a most objectionable form of “scientism” that reeks of a hidden agenda that has little to do with interpreting the forest’s ecological potential.

ESA - As a foundational ecosystem analysis and interpretation tool, Pfister et al. is linked directly to specific language, unambiguously articulated by Congress, to describe
the Purposes of ESA (Endangered Species Act).

(b) PURPOSES

The purposes of this chapter are to provide a means whereby the ecosystems upon which endangered species and the threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth in subsection (a) of this section. Page one, 16 USC, Chapter 35, §1531(b)

We urge the Forest Service to simply comply with the clear intent of Congress, and its own (government funded) research to properly identify the habitat type in the project area using Pfister, et al. (attached) and arrive at an intelligent decision based on the best available science, and the intent and purposes of the federal laws which govern these types of project-level management actions. Emphasis added.
….end of project/EA analysis which references Pfister, and then proceeds to depart into a lengthy narrative, not about habitat type, but some typing using inadequate date, insufficient field examination and data and computer modelling that fails to follow Pfister's habitat typing methodology.

Roadless rule says: "... maintain or restore the characteristics of ecosystem composition and structure..."

May I suggest that HABITAT TYPE, NOT "***...Vegetation condition class (VCC; formally known as fire regime condition class)...***" is the foundation and best available science to determine characteristics of ecosystem composition and structure. (Pfister, et al. (1977). All this "vegetative" mumbo-jumbo is used to avoid Pfister and proper, foundational identification of the habitat type. The Forest Service is looking at the Tyler's Kitchen project as "tree farmers" not scientists studying natural forest succession/evolution in violation of NEPA, NFMA, the APA, the Clearwater Act and the ESA.

Thank you for your attention to these concerns.

Sincerely yours,

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