

September 3, 2024

Bonanza Project

Ranger Helen Smith

White Sulphur Ranger District

Helena-Lewis and Clark National Forest

PO Box A

White Sulphur Springs, MT 59645

Dear Ranger Smith,

Thank you for this opportunity to comment. Please accept these comments from me on behalf of the Alliance for the Wild Rockies, Council on Wildlife and Fish, Center for Biological Diversity, and Native Ecosystems Council on the proposed Bonanza Project.

Page 18 of the Bonanza Vegetation Preliminary Report states:

The Forest-wide Prescribed Fire Project proposes burn treatments on up to 800-1,200 acres annually in the Castles GA, with sites selected based on a prioritization process. The restoration of natural fire regimes in the warm dry and cool moist broad potential vegetation types can be anticipated to support the desired conditions. In terms of structure, the proposed prescribed fire project would facilitate patch size that is more characteristic of the natural range of variability, which is smaller patches

Please analyze the cumulative effects of the Forest-wide prescribed burning and the Bonanza project.

Wouldn't it be easier to analyze the cumulative effects if the Forest-wide burning stayed out of the Castles GA that way there are not two different projects in the same project area?

Please find attached Williams and Baker 2012 which reached the opposite conclusion in regards to what the natural fire regime was.

The conceded:

Spatially extensive reconstructions from the late 1800s show that these forests were structurally variable, including areas of dense forests and understorey trees and shrubs, and fires var-

ied in severity, including 15–65% high- severity fire. A set of laws, policies and initiatives that aim to uniformly reduce fuels and fire severity is likely to move many of these forests outside their historical range of variability with adverse effects on biological diversity. Macroscale survey-based reconstructions and palaeoecological studies reveal that higher-severity fires were and are a part of the normal dynamics of dry forests.

Therefore the project is not meeting the purpose and need of the project and is not based on the best available science.

Thank you for your attention to these concerns.

Sincerely yours, Mike Garrity

Alliance for the Wild Rockies

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