Certified Mail # 9589 0710 5270 0699 7296 61

September 4, 2024

Helen Smith, District Ranger

Belt Creek White Sulphur Springs Ranger District

PO Box A

White Sulphur Springs, MT 59645

RE: COMMENTS ON THE PROPOSED BONANZA PROJECT

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, and the Council on Wildlife and Fish would like to submit these comments for the Bonanza Project. We would like to identify the following issues and concerns, which were not previously identified in scoping for this project as the Forest Service did not do scoping, in violation of Forest Service requirements.

1. Please summarize how the removal of scoping for this project reduces public involvement opportunities, and why is action is being implemented.

Please define why the initial scoping period was not provided for the Bonanza Project, and how much public involvement opportunities have been reduced as a result. What is the specific Forest Service direction that is being implemented to reduce public involvement opportunities on the HLC, such as eliminating the initial scoping period, where public issues and concerns are initially identified for

a project to be considered in project design. Since this is a change in public involvement opportunities, what type of NEPA analysis has been done to address this change?

2. We were unable to determine how the Bonanza Project is being proposed to implement the Revised Forest Plan (RFP) for the Helena-Lewis and Clark National Forest in order to implement Desired Conditions (DCs) identified for the Castle Mountains Geographic Area (GA).

The proposed treatments are not clearly consistent with achieving the RFP desired conditions (DCs) for the Castles Geographic Area (GA) for cover types, as identified in the RFP for the Castles GA Table 46. Yet there was no discussion in the PEA as to why these inconsistencies adhere to RFP direction. For example, the DC for nonforest is currently 15% as per the RFP, which is within the DC of 10-20% (Table 46 in RFP); increasing openings in meadows is not required for meeting DCs. The existing DC for lodgepole pine of 35% is within the proposed DC of 30-40%, so why is this cover type being clearcut, which will remove the lodgepole pine cover type for approximately 20-40 years? The existing subalpine fir-spruce cover type is 6%, which is within the DC of 5-10%. Clearcutting 33 acres of this cover type is not required to meet RFP DCs. The current percentage of the ponderosa pine cover type is "zero", which is far below the DC of 15-30%. There will be 78 acres of this cover type treated, apparently with commercial thinning and/or improvement thinning of Douglas-fir stands to create a ponderosa pine cover type. However, there is actually no information on how RFP DC for ponderosa pine will be implemented. The RFP DC for the Castles as per Douglas-fir is consistent with the DC; the Douglas-fir cover type for the Castles is currently 35% (RFP Table 46) which is higher than the DC of 10-20%. The Bonanza Project will treat 968 acres of this cover type as per Table 1 in the PEA, but there is no information provided as to how this will address the DC for the Castles. It is possible that the treatment of 78 acres of ponderosa pine stands will promote removal of the Douglas-fir cover type, which would be consistent with the RFP DC for the Castles. However, the remaining treatments in 895 acres of the Douglas-fir cover type will not change this cover type, which is inconsistent with the RFP

DC for the Castles. This shows that the RFP DC cover types, as identified for the Castles GA in Table 46, can not be interpreted as per on-the-ground activities, including within the Bonanza Project Area. The DC for the Douglas-fir cover type for the Castles is 10-20%, while the existing percentage of this cover type is 35%. So what does this mean? How will the agency reduce the Douglas-fir cover type down from 35% to the DC of at least 20% to move towards RFP DCs? What natural process occurred historically to eliminate the Douglas-fir cover type, that needs to be replicated by the RFP DCs?

The unexplainable DCs for Douglas-fir forests in the Castles GA is not the only problem with these DCs. Another serious problem is the agency's interpretation that seedling age classes, with a proposed DC of 1-20% in the Castles GA, is supposed to represent historic conditions. However, clearcuts are not representative of historic beetle-killed and or burned forests, due to the lack of the snag forests these disturbances create. So the DC for seedlings in the Castles GA require creating unnatural conditions, conditions that never occurred historically. This means that the agency claims that DCs represent historic conditions of forested landscapes for other DC categories are also questionable.

We have similar concerns about the RFP size class DCs. First, it is not clear if the 5 size classes for forests identified in the RFP Table 48 overlap with each other, or are specific individual stands. For example, do the small and medium-sized trees also occur in stands with large and very large trees? Table 2 in the Project Vegetation Report indicates that these are separate forest categories, which total up to the acreage of the Castles GA of 60,049 acres. However, it does not appear that Douglas-fir stands are only of one size class. Given the actual overlap of many size classes within a given Douglas-fir stand, it is unclear how RFP DCs for size classes is actually being applied to the Bonanza Project.

It is also unclear how the RFP Castles GA as per the DC for size classes is being implemented for the Bonanza Project. For example, since medium-sized trees are within the DC for the Castles GA (RFP Table 48), there is no need to remove this

size category within Douglas-fir treatments, or as well, with clearcutting lodgepole pine stands. Also, since there is a deficit of large and very large trees in the Castles GA, reducing medium-sized trees in the Bonanza Project is inconsistent with achieving DCs for this GA. These medium-sized trees are required to grow into larger trees, and thus should not be removed as per the Castles GA DCs.

It is also unclear how conflicting affects of achieving RFP DCs are being addressed in the Bonanza Project. For example, there is a deficit of medium, large and very large trees (RFP Table 48), but an excess of small trees. To reduce small trees by clearcutting, larger trees will also need to be removed, which are deficient in the Castles GA. Also, none of the Douglas-fir treatments will remove only small trees. So the agency apparently has determined that moving towards one category of DCs takes precedence over another category (e.g., reducing small trees to meet the GA DC is more important than meeting the GA DC for medium-sized trees). The PEA does not address specifically these inconsistencies of applying the RFP DCs.

Finally, we have similar concerns about the proposed project design to achieve the Castles GA DCs for tree density. The low-medium density class of 28% is within the DC for the Castles of 20-40%. The medium-high density of 46% is within the Castles DC of 30-50%. And the high density class of 26% is within the Castles DC of 15-45%. So in effect, the agency has no rationale for changing these density classes to meet the Castles DC, as they are already met.

The Castles DC does not have any category for sagebrush cover types, which have a very high value to wildlife. Since the Bonanza project appears to include burning of sagebrush, why isn't this cover type included in attainment of RFP DCs?

Of particular note is the information provided that the forest-wide prescribed burning program will treat from 800-1200 acres per year in the Castles GA. This project raises concerns that the HLC will again not adhere to the RFP DCs for the

Castles. Since this burning program will impact DC conditions being managed for the Bonanza Project, some information on how these 2 projects together will meet RFP DCs for the Castles GA needs to be included in the Bonanza project descriptions. If both projects will fail to meet RFP DCs for vegetation, an Environmental Impact Statement if required to evaluate all of the proposed management actions in the Castles when they overlap in time and space.

3. The actual percentages of DCs for a GA could result in 15 different conditions for each of 5 cover types; this huge variability for DC cover types was not addressed in the RFP or in the Bonanza Project.

The DC for forest size classes (RFP Table 48) and forest density categories (Table 49) include forest conditions that are not exclusive. For example, all of the categories for size class (5 categories) could each have 3 different density classes. This would mean there are 15 different forest conditions based on size and density. When 5 conifer forest cover types are added into this, there would be 75 different DCs created. It is unclear how these are measured for DCs, including for the Bonanza project. As for density classes, it is also unclear what this Table 49 (RFP) is based on. It appears that the agency is assuming that stand density increases with stand age, which is clearly inconsistent with the concept of habitat types, where stand density is consistent across ages. Application of these DCs to site specific projects requires a full discussion to the public as to how these DCs were derived. For example, as previously noted, how is a forest cover type reduced or increased based on agency actions? How can the DC for Douglas-fir forest cover types be reduced? How would this be done?

4. The HLC RFP claims that moving to the historic range of variability (HRV) is needed to restore healthy, resilient forests is false, and is therefore a violation of not only the NEPA, but forest planning rules, which require that Forest Plan be based on the current best science.

The basis for the HLC claims that massive landscape treatments for fuels reduction and logging are needed to restore forests to their historic conditions has never been through any type of peer, scientific review, even thought this hypothesis is what the RFP is based on. As we noted previously, there are huge questions about agency claims regarding HRV. For example, how are forest cover types going to be changed to move to HRV? How are Douglas-fir forest cover types going to be eliminated? Another problem is the objective of reducing stand replacement fire, which is an essential ecosystem process for many wildlife species. The claim that current stand replacing fires are higher than historic conditions has never been actually verified by science, and as well, the occurrence of stand replacement fires will depend on climatic conditions, which fluctuate over time, instead of being a constant. Another issue with the agency's claims for HRV is that forest stands increase in density with age, which is directly counter to the well-established concept of habitat types. Then there is the requirement for HRV for forest stands to basically have no snags, even though this is a critical habitat feature for wildlife. The only documented HRV for old growth forests, from 20-50% of the Northern Rockies landscape, is not recognized in the agency's HRV claims. It is clear that claims as per HRV are actually designed to promote logging and fuels treatments. Instead of trees dying and remaining in forests for wildlife, these trees will be removed by commercial logging to promote tree growth (repeatedly noted in the Bonanza project NEPA documents) and potentially reduce crown fire probabilities, a claim that is controversial at best. The cumulative mortality from mixed severity fires in Northern Rockies forests has been shown in specific cases to be the same as cumulative mortality in treated (logged) forest stands. Thus the only actual difference between naturally-burned forests and burned treated forests is that many of the trees that have died are due to logging instead of fire. This means that treatment of stands are not saving trees, just changing the cause of death from fire to logging. Overall, the lack of any scientific documentation regarding the agency description of HRV and thus vegetation DCs, along with the obvious huge disturbances and impacts on wildlife habitat that will result from claims of moving to HRV, the HLC RFP DCs to achieve HRV is, as we noted, a violation of the NEPA as the agency is providing false justifications to the public for promoting commercial timber harvest. This is also a violation of the NFMA, as DCs for vegetation are based on a false premise.

The HLC RFP DCs for vegetation also do not address climate change. The climate is not the same as it was 150 years ago, or during pre-settlement times. Trying to create forest conditions that were present 150 years ago is a violation of the NEPA, as the climatic conditions that existing at that time no longer exist.

5. The RFP DCs for GAs do not address how they would provide habitat for elk; implementation of DCs as per the RFP and associated FEIS will have undisclosed effects on elk due to the massive increase in access required to implement massive forest landscape alternation activities.

The Bonanza project is a good example of how the Forest Service intends to meet RFP DCs within GAs. Yet the RFP and associated FEIS has no analysis as to how DCs affect habitat for elk, a former indicator species for both the Helena and Lewis and Clark National Forests. For example, the DCs affect on hiding cover is not addressed in the RFP or associated FEIS. For the density classes, the DC for the Castles GA includes 30-50% for medium/high density, and 60% or greater for high density. Given that these higher density classes would provide hiding cover, this means the Castles GA DC for hiding cover is 45-90%. If openings are not included, this would still provide a hiding cover DC from 36-76%. Thus the minimum hiding cover as per the vegetation DC would be 36%. But this DC for hiding cover is never discussed for the Bonanza Project. Why isn't this GA required to have at least 36% hiding cover? There was no analysis of hiding cover, even though this is a RFP DC for vegetation. The Castles Final Environmental Impact Statement (FEIS) in Table 153 shows the existing hiding cover for various watersheds in the Castles. For those watersheds included in the Bonanza Project, the hiding cover levels range from 19-30% in 6 watersheds, with an average of 25% hiding cover. Yet to meet the HLF RFP DCs, the agency intends to remove roughly 2,000 acres of hiding cover. This conflict between achieving RFP DCs and elk habitat is never addressed in the Bonanza PEA. The agency provided no science to indicate that habitat use by elk in the Bonanza Project area is not affected by hiding cover levels, and as such, has not justified the failure of the agency to evaluate hiding cover levels on elk. At a minimum, hiding cover will affect elk security, as per the definitions of elk security by both Hillis and Lowrey. However, the Project Wildlife

Report did not clarify as to whether security areas include hiding cover, either currently or after treatment. Regardless, there is an identified paucity of security in the Castles GA, ranging from 0.7 to 6.2% as per Lowrey (Table 13 in Project Wildlife Report). This lack of security is consistent with the lack of hiding cover in this landscape portion of the Castles. And as indicated in the Project Wildlife Report, these levels of security are displacing elk to private lands in the hunting season. The Travel Plan identifies a minimum recommended level of 30% security for elk.

One of the problems with a lack of elk security is the existing and project-level active motorized route density. The Project Transportation Report notes at Table 3 that the project area currently has a road/trail density of 3 miles per section (150 miles of motorized routes in 50 square miles of the project area). This represents 40% habitat effectiveness, while the Travel Plan notes that a 50% elk habitat effectiveness level is required to manage for elk. Yet the project includes extensive new construction of roads, including conversion of trails to roads. This extensive increase in an already high road/trail density to achieve RFP DCs is an inherent conflict between vegetation DCs and wildlife habitat, a conflict that was never addressed in the RFP and associated FEIS. So the question is, how does the RFP DCs for the Castles address elk habitat? Specifically, how is the conflict between vegetation DCs and wildlife DCs addressed in projects? This conflict for the Bonanza Project is not addressed in the PEA. If meeting the vegetation DCs results in a failure to meet a wildlife DC (FP-FW-FWL-DC -01), which DC takes precedence? This question is never addressed in the project PEA. In fact, we contend that since the Bonanza Project is implementing unnecessary activities as per RFP vegetation DCs in the Castles, the agency must instead adhere to the wildlife DC for maintaining elk on public lands (FP-FW-FW-DC-01).

6. The DCs for the Castles do not require any level of old growth habitat, even though this is a key habitat for many wildlife species.

The DCs for the Castles do not identify any level of old growth forests as defined by Whitford (1991) or Green et al. (1991). Since the DCs are to represent historical levels, these have been identified in a published, peer-reviewed document as ranging from 20-50% in the Northern Rockies. Where is this historical range of old growth addressed in the RFP DCs? AS per Tables 48-49 in the RFP, on forested land, there could be from 32-75% of forests at least 10 inches dbh, which is the old growth size for lodgepole pine, and there could be from 45-95% of the forests with a canopy cover over 40%, which could include some drier old growth forest types. What would this create as per the DC for old growth, including by cover type? This is never addressed by the agency, either in the RFP or the Bonanza project.

The minimum levels of old growth identified for wildlife range from 20-25%. The old growth descriptions for the HLC would be both the Whitford (1991) masters thesis, or the complete definition of old growth as per Green et al. (1991).There are roughly 20 bird species on the HLC associated with old growth forests that are likely present in the Castle Mountains as per Skaar 1996. This includes the Pileated Woodpecker, which has been identified as present in the Castle Mountains in goshawk monitoring reports:

> Pileated Woodpecker, Great Gray Owl, Norther Goshawk, Flammulated Owl, Northern Pygmy Owl, Northern Saw-whet Owl, Boreal Owl, Three-toed Woodpecker, Red-naped Sapsucker, White-breasted Nuthatch, Red-breasted Nuthatch, Brown Creeper, Hermit Thrush, Varied Thrush (possible), Townsend's Warbler, Hammond's Flycatcher, Golden-crowned Kinglet, Pine Grosbeak, Swainson's Thrush, and Lewis's Woodpecker. Montana Species of Concern include 7 of these species, including the Pileated Woodpecker, Great Gray Owl, Northern Goshawk, Flammulated Owl, Brown Creeper, Varied Thrush, and Lewis's Woodpecker. In addition, one species, the Brown Creeper, is a Level 1 Priority Bird Species in Montana. Six more of these old-growth associated birds are Level II Priority Bird Species in Montana, including the Northern Goshawk, Lewis's Woodpecker, Three-toed Woodpecker, Hammond's Flycatcher, Pileated

Woodpecker, and Red-naped Sapsucker. And 4 other of these old-growth associated birds are Level III Priority Bird Species in Montana, including the Great Gray Owl, Boreal Owl, Golden-crowned Kinglet, and Townsend's Warbler.

The PEA for the Bonanza Project claims there is no old growth either in treatment units or the project area. Yet the cover photo of the PEA shows what is clearly an old growth lodgepole pine cover type, at least in the "early seral" old growth phase. Even though these beetle-impacted lodgepole pine stands may be younger than 140 years, the age old growth normally occurs, the high density of snags creates functional old growth, as noted by Hamilton (1990). Whitford (1991) also notes that old growth needs to include early phases.

It is likely that most of the proposed treatment units in the Bonanza project are either old growth or early seral old growth. Development of old growth is an important conservation plan for wildlife in the Castles GA, which is noted to have only 10% old growth in a 2004 monitoring report on the Lewis and Clark National Forest. This is below the 1995-96 estimates of 13.3% old growth for both the Helena and the Lewis and Clark National Forests. It is also below the old growth level identified as typical of goshawk post-fledging areas of roughly 14% (2004 and 2006 Lewis and Clark National Forest monitoring reports. There are 2 goshawk nesting territories that will be impacted by the Bonanza Project. The Bonanza project is likely removing up to 585 acres of Douglas-fir old growth via restoration thinning, and 1,012 acres of lodgepole pine old growth via clearcutting (PEA Table 1). This loss of early seral or actual old growth in the Bonanza Project thus comes to 1,597 acres in a GA that is already deficient as per forest-wide old growth. There is no analysis as to how the loss of either current old growth, or recruitment old growth, will impact forest birds in the Bonanza NEPA documents.

7. The Castle DCs for vegetation do not measure current or planned habitat conditions for the goshawk, a former Management Indicator Species for both the Helena and Lewis and Clark National Forests.

The DCs also do not address goshawk habitat, either in respect to old growth or general forest conditions. Monitoring reports on the Lewis and Clark National Forest from 2004 and 2006 identified that goshawks use habitat within both the post-fledging areas with the following composition: 11.2% grass/rock, 2.6% seeding/clearcuts, 0.92% saplings, 13.7% old growth, and 69.1% mature. General landscape conditions in occupied goshawk habitat in the Jefferson Division and the Little Belt Mountains included the following: 14-16% old growth, 67-68% coniferous forest, 2-3% saplings, 4% clearcut/seedling/fire, and 11-12% grass/rock. What is not clear in these results is whether mature forests in goshawk habitat have been treated in any manner. But what is known about this monitoring data, along with goshawk selecting for 14% old growth habitat in both the post-fledging area and general habitat, clearcut areas are selected against. The 4% seedling/clearcut percentage in general habitat occupied by the goshawk would mean that a 6,000 acre territory would have no more than 240 acres of clearcuts, while a post-fledging area would have no more than 120 acres of clearcuts. The proposed 1,012 acres of clearcutting for the Bonanza Project will be over double the Forest Plan monitoring levels in 2 goshawk territories (480 acres total). However, most of the clearcutting will be in the West Fork Flagstaff goshawk territory. So based on Forest Plan monitoring the Bonanza Project will clearly have adverse impacts on a former MIS, the goshawk.

Monitoring of goshawks on the Lewis and Clark National Forest has also identified the critical importance of post-fledging areas (PFAs) for productivity in goshawk territories. As noted by Forest Service biologist Victor Murphy in his 2014 report on PFAs, this habitat is limited on the Lewis and Clark National Forest. This is clearly evident in the aerial photos of the PFAs for both the Pasture Gulch and West Fork Flagstaff goshawk territories. Although these PFAs have been mapped by Murphy, this information is not provided in the Bonanza PEA. But a 2014 report by Murphy noted identified the West Fork Flagstaff PFA is 396 acres in size, and the Pasture Gulch PFA is 389 acres in size. Douglas-fir habitat surrounding the West Fork Flatstaff PFA will be impacted by units 141, 141a, 328, 135 and 135 a immediately to the southwest and northeast (149 acres), and by units 149c and 155a, totaling 199 acres, to the south of the PFA.. Also too the north of the nesting area, will be unit 129 at 53 acres. And to the east of the nesting area, will

be units 414a, 413a, and 413b, for 22 acres. Further south of the nesting area wall be unit 158 at 112 acres. As is evident from the landscape photo of the West Fork Flagstaff nesting area, forested habitat is very limited in this landscape so the Bonanza Project while not directly eliminating mapped PFA habitat, will reduce goshawk foraging habitat in the vicinity of the nesting area by Douglas-fir thinning treatments. In addition, almost all of the planned clearcuts are in the West Fork Flagstaff goshawk territory. Thus this territory will experience a loss of roughly 1500 acres of foraging habitat. The impact on the viability of this territory was not addressed in the Bonanza PFA. However, creating roughly 1000 acres of clearcuts means that a 6,000 acre goshawk territory will be roughly 17% clearcuts, while Forest Plan monitoring reported only around 4% clearcuts in goshawk habitat. This is a conservative estimate, given the open nature of the landscape surrounding the West Fork Flagstaff goshawk territory. In addition, goshawk territories have contained approximately 14% old growth. It is likely that most of the proposed harvest units in the West Fork Flagstaff goshawk territory are either early seral or actual lodgepole pine as well as Douglas-fir old growth. The current versus planned levels of early seral or actual old growth in this territory remains unknown. Regardless, degrading this goshawk territory is not consistent with meeting the RFP DCs for the Castles, and does not create a conflict between meeting RFP DCs and maintaining goshawk viability.

Actual conflicts with maintaining PFAs in the Pasture Gulch goshawk territory would occur with the Bonanza project, as unit 19c in located within the PFA. This would reduce this PFA by 28 acres due to thinning of Douglas-fir habitat.Reducing forest density within PFAs is noted via Forest Plan monitoring to increase the risk of predation to juvenile goshawks, reduce prey species, and increase the effects of severe and/or extreme weather events for both goshawk nests and goshawks in general.

8. The planned adverse impacts on 2 goshawk territories in the Bonanza Project require a cumulative effects analysis of all such detrimental projects planned on the HLC, along with an estimated population impact.

There are a number of other vegetation projects planned on the HLC that will impact goshawk nesting and foraging habitat, such as the Wood Duck project, the Horsefly Project, the Middleman Project, and the Coyote Divide Project. The Horsefly project, while currently on hold, will have the biggest impact on goshawk habitat due to the considerable number of goshawk territories that will be severely impacted. As per the 2017 Lewis and Clark goshawk monitoring report, there was a precipitous decline in active goshawk territories, which has raised concerns about viability in recent times. This concern cannot simply be "dropped" because of a new forest plan. As per the NEPA, concerns about goshawk viability remain a public issue that the agency needs to address. And as well, the viability requirements of the NFMA also need to be addressed, especially where there is existing information that indicates viability problems may exist, such as with the goshawk. Given the ongoing plans to further degrade goshawk habitat in numerous areas of the HLC, the agency is required by both the NEPA and the NFMA to evaluate how these projects are cumulatively impacting goshawk viability.

9. Termination of the long-standing monitoring program for the MIS goshawk with forest plan revision on the Helena-Lewis and Clark National Forest was never addressed in the RFP, including why such termination was necessary or how such termination would impact not just goshawks but other species associated with old growth forests.

The Lewis and Clark Forest goshawk monitoring program was a very productive program, and included goshawk experts that used monitoring information to define what goshawk management on this forest was needed in order to maintain viable populations. With the RFP, all goshawk monitoring efforts were terminated, and there are no requirements in the RFP for any goshawk habitats, either within PFAs or within territories, including old growth. The agency failed to discuss why the RFP eliminated goshawk monitoring, particularly given the most recent documented declines in goshawk nesting activity on the Lewis and Clark National Forest. Without continued population monitoring, the agency has no idea as to the continued viability of this species, especially as goshawk habitat is

threatened by logging (e.g., Bonanza Project). Thus the agency cannot meet the requirements of the NFMA, or as well, the Migratory Bird Treaty Act (MBTA), as the goshawk is a migratory bird species. If the agency believed that goshawk viability could be ensured without a monitoring program, this information should have been provided to the public during forest plan revision. Without such information, the public could assume that viability of goshawks on this forest was not considered important in forest plan revision. We believe that the termination of the goshawk monitoring program is a violation of the NFMA by failing to monitor this species, and a violation of the NEPA by failing to provide the public information on an important issue – viability of this Montana Species of Concern in the face of expansive clearcutting and fuels management activities, including the upcoming Forest-wide burning proposal, which will have massive impacts on goshawk habitat, impacts that will never be monitored on a forest-wide basis.

10. The HLC DCs for the Castles GA do not ensure that a key wildlife habitat, forested snag habitat, will be provided for 22 bird species dependent upon this habitat for viability.

One of the many shortcomings of the RFP vegetation DCs, including for the Castles GA, is a key habitat for birds, forested snag habitat. The importance of forested snag habitat has been identified from research on the Helena National Forest, where Three-toed Woodpeckers, an MIS for the former Lewis and Clark National Forest Plan, nested in beetle-killed forests with up to 70 or more larger (over 9 inches dbh) snags; these snags also resulted in population increases of other cavity nesting birds. On the Lewis and Clark National Forest as well, the MIS Three-toed Woodpecker was noted to predominately nest in unlogged forests, which would be providing forested snag habitat. Bird species (22) likely present in the Castle Mountains that require forested snag habitat include the following:

American Kestrel, Black-capped Chickadee, Boreal Owl, Northern Saw-whet Owl, Northern Pygmy-Owl, Brown Creeper, Downy Woodpecker, Hairy Woodpecker, Flammulated Owl, House Wren, Lewis's Woodpecker,

Mountain Bluebird, Mountain Chickadee, Northern Flicker, Three-toed Woodpecker, Tree Swallow, Violet-green Swallow, White-breasted Nuthatch, Red-breasted Nuthatch, Pileated Woodpecker, and Red-naped Sapsucker. Montana Species of Concern include 3 of these species, the Brown Creeper, Flammulated Owl, and Lewis's Woodpecker. Level I Bird Priority Species in Montana include the Flammulated Owl and Brown Creeper. Level II Bird Priority Species in Montana include 3 of these species, the Lewis's Woodpecker, Red-naped Sapsucker, and Three-toed Woodpecker. Level II Priority Bird Species in Montana include the Boreal Owl, as well as the Great Gray Owl, a species that nests on top of dead trees.

The forested snag habitat required by these 20 forest bird species cannot be met by retention of some snags in some areas of project areas or the forest, as per the RFP snag direction. This snag direction is invalid not only because it is inconsistent with the current best science, but because it was carried over from the 1986 previous forest plan without any documentation of its effectiveness. This is the exact opposite of what the HLC did for a highly effective goshawk monitoring program, which was terminated in the RFP. Carrying the Helena and Lewis and Clark Forest Plans snag direction into the RFP is a violation of both the NEPA and the NFMA, since effectiveness has never been demonstrated, including in a large part for a monitoring failure. In essence, the agency has used the lack of monitoring of previous forest plan direction for snags as a means of carrying this strategy forward into revised forest plans. Monitoring failure should not be a basis for RFP direction. The new RFP snag management strategy for the HLC has no biological basis for maintain snag-associated species. In addition, the DCs for the RFP will promote the continued erosion of effective forested snag habitat on the HLC in Douglas-fir habitats. Although inconsistent with the DCs for the Castles GA, the agency intends to also remove over 1,000 acres of high quality forested snag habitat in the Bonanza Project, to the huge detriment to 22 species of birds that require this habitat. The RFP needs to implement a valid snag management strategy for these bird species to meet the requirements of the NFMA for their viability. Implementing a forest plan that promotes a loss of viability of a host of wildlife species is a violation of the NFMA.

11. The HLC RFP DCs for vegetation, including in the Castles GA, do not ensure viability of bird species dependent upon conifer seeds.

The DCs for the Castle GA do not represent habitat needs for birds that depend upon conifer seeds as forage. Conservation recommendations for this suite of species direct the retention of large, unfragmented blocks of relatively dense, mature and older forests distributed across a landscape so that an adequate conifer seed source is available over time. Bird species dependent upon conifer seeds in these types of forest stands include at least 25 species that would be present in the Castles:

> Cassin's Finch, Evening Grosbeak, Red-breasted Nuthatch, White-breasted Nuthatch, Red Crossbill, White-winged Crossbill, Pine Siskin, Hairy Woodpecker, Pinyon Jay, Clark's Nutcracker, Gray Jay, Stellar's Jay, Mountain Chickadee, Black-capped Chickadee, Blue Grouse, Flickers, Lewis's Woodpecker, Robin, Pine Grosbeak, Slate-colored Junco, Oregon Junco, Chipping Sparrow, Purple Finch, English Sparrow, and Crow. Five of these species, the Cassin's Finch, Evening Grosbeak, Pinyon Jay, Clark's Nutcracker, and Lewis's Woodpecker, are Montana Species of Concern.

12. The RFP vegetation DCs, including for the Castles GA, do not ensure habitat is available for viability of forest birds that are benefited by mixed severity fires.

The RFP DCs, including in the Castle GA, also do not represent habitat needs for a considerable number of bird species that benefit from various types of fire, including stand-replacing and low-severity fires. The mosaics created by mixed severity fires create a variety of habitats over time that are important to birds, including high insect populations the feed on both recently-killed and eventual deaths of other trees in low-severity burn areas, high densities of snags for nesting, including broken-topped snags created by winds, high availability of

conifer seeds due to cone opening created by fire, high availability of insects that develop as tree bark begins to slough off on dead trees, the creation of burned/unburned forest edges needed specifically by some species, and eventual development of dense conifer seedlings and shrubs post-burn. Bird species in Montana noted to benefit from mixed severity fire (including both stand-replacing and low severity fire) include the following 24 species that use conifer forests and/or snags for nesting and/or dense shrub habitat:

Black-backed Woodpecker, Hairy Woodpecker, Three-toed Woodpecker, Northern Flicker, Western Bluebird, Mountain Bluebird, Townsend's Solitaire, Western Wood-pewee, Dusky Flycatcher, Cassin's Finch, Pine Siskin, Lazuli Bunting, Lewis's Woodpecker, Chipping Sparrow, Tree Swallow, Dusky Grouse, White-breasted Nuthatch, Calliope Hummingbird, Williamson's Sapsucker, Red C r5ossbillo, Red-breasted Nuthatch, Hammonds Flycatcher, Hermit Thrush, and Olive-sided Flycatcher. Although the Black-backed Woodpecker and Williamson's Sapsucker may not occur in the Castle Mountains, they do occur in other areas of the Helena-Lewis and Clark National as per Skaar (1996). Four of these species are Montana Species of Concern (Cassin's Finch, Black-backed Woodpecker, Olive-sided Flycatcher, and Lewis's Woodpecker) while the Calliope Hummingbird and Williamson's Sapsucker are USFWS Northern Rockies Region Birds of Conservation Concern.

13. Habitat for generalist bird species is not ensured by the RFP vegetation DCs, including within the Castles GA.

There are many other western forest birds on the HLC, and in the Castles Mountains, that were not included in any of the above categories. These would be more "habitat generalists" that depend upon good forested habitat, that includes hiding cover, thermal cover, nesting sites, and forage resources. These include the following 17 species not previously identified:

Sharp-shinned Hawk, Great Horned Owl, Cooper's Hawk, Red-tailed Hawk, Ruffed Grouse, Long-eared Owl, Least Flycatcher, Cordilleran Flycatcher, Common Raven, Cedar Waxwing, Solitary Vireo, Warbling Vireo, Orange-crowned Warbler, Wilson Warbler, Yellow-rumped Warbler, Western Tanager, and Tree Sparrow.

The combined total of the western forest birds listed above comes to approximately 25 birds using conifer seeds, another 21 species associated with snags and/or old growth forest habitat, another additional 10 species benefited by mixed severity fire, and then another 17 bird species that are more habitat generalists, including use of mixed conifer/aspen stands as the Sharp-shinned Hawk, Cedar Waxwing, and Warbling Vireo. This comes to approximately 73 species of western forest birds on the HLC that are not addressed by vegetation DCs in the RFP. The RFP and associated FEIS make the "assumption" that RFP DCs will maintain viable populations of these 73 forest birds, without any actual analysis. This is not only a violation of the National Environmental Policy Act (NEPA) for failure to support conclusions with any actual analysis, but is also a violation of the National Forest Management Act (NFMA) for a failure to identify how much and where key habitats for these species will be provided. The HLC RFP and associated FEIS is also a violation of the Migratory Bird Treaty Act (MBTA) for failing to ensure the conservation of migratory bird species through land management activities.

14. Clearcutting, which does not represent natural conditions, has severe impacts on both local climates and local wildlife; these severe impacts were never evaluated in the HLC RFP and associated FEIS; in addition, the rationale for creating large clearcuts, including those over 75 acres of the limit in the HLC RFP, is based on invalid science.

We tried to measure the size of proposed clearcuts for the Bonanza Project, with hopefully reasonable accuracy. We included all groups of clearcuts that were close to each other, or in clumps. The agency's practice of leaving tiny little strips

of forests between clearcuts does not actually change the landscape impact of clumps of clearcuts, as these tiny forest strips have almost no wildlife value. For example, elk hiding cover is recommended to be at least 600 feet wide, and 26 acres in size (circular). And for forest birds, these strips will be entirely edge habitat, which is very low quality habitat for many reasons, included high temperatures, high wind effects, high predation rates, and low hiding cover and forage values. We estimated that there will be 10 clearcut areas that will exceed 40 acres in size; these sizes are 56, 159, 118, 69, 129, 71, 47, 59, 77, and 144 acres. This is 929 acres of clearcuts over 40 acres, which is almost 92% of all planned clearcutting. Given that clearcuts "of any size" remove almost all habitat for forest birds, and degrades goshawk territories on the HLC, both the HLC RFP and associated FEIS, as well as the Bonanza project NEPA documents, do not evaluate wildlife impacts of these clearcuts either for birds, big game species or threatened species habitat connection in this linkage zone for grizzly bears, wolverines and lynx. In addition, the seedling stage for forests in the Castles is within the RFP DC. So the actual justification for clearcutting of any sizes was never demonstrated for any reason other than to provide commercial timber products to private interests.

One particular claim made by the agency is that lodgepole pine stands that were impacted by beetles over 10 years ago are actual openings created by "catastrophic" conditions, and thus would not be considered openings created by clearcutting. This is a Forest Service justification for clearcutting that has no actual on-the-ground basis. One example is the photo of a lodgepole pine stand on the cover of the Bonanza PEA, which is supposedly an opening due to past insects impacts. This stand is clearly not an opening, and claims that it is such is a violation of the NEPA as well as the Administrative Procedures Act (APA). As well, there is research in the Elkhorn Mountains of the Helena Forest where effects of a pine beetle epidemic were noted to create up to 80% mortality of older lodgepole pine. However, the canopy cover of this stands was reduced by less than 10%, and canopy cover recovered to pre-beetle levels within 10 years. In addition, these stands provided elk security habitat. If the agency is going to claim that beetle-impacted lodgepole pine stands have been converted into openings, specific examples within a specific landscape need to be provided as documentation to

the public. Without some type of documentation, these claims actually appear ridiculous!!!

As per "catastrophic conditions," the agency did not actually discuss why clearcutting, or massive killing and/or removal of essentially all sizes of trees within a forest stand, does not represent a catastrophic impact to the forest as well as wildlife, while mortality of only many older trees in a stand by beetles, trees which remain in place after death, is considered a catastrophic impact. The basis for measuring what constitutes "catastrophic impacts" is never identified by the agency, even though this claim is used as justification for creating clearcuts of any size. The commercial trees are already dead from beetles, so clearcutting will not save these trees. Yet clearcutting will have catastrophic impacts on wildlife, so the rationale for clearcutting is unclear, except to create new forest stands for timber production. If the agency is going to claim that clearcutting is needed to address the catastrophic conditions created by pine beetles, the actual resources that need to be protected by clearcutting need to be identified to the public.

One aspect of clearcutting to correct catastrophic conditions is the impact on local climate. Science has demonstrated that clearcuts may have temperatures 18 degrees higher than adjacent forests. And over time, due to vegetation breeze, the cool, moist air in forests is drawn out into clearcuts, causing forest conditions also to degrade for wildlife. Forests are known to stabilize local climates, so removal of these forests will have direct impacts on local climates. Neither the HLC RFP and associated FEIS, or the Bonanza Project, which is proposing over 1,000 acres of clearcuts in what is already a relatively open landscape, discuss the local climate conditions these clearcuts will create, or why they are included in the vegetation DCs. This is a violation of not only the NEPA, but the APA as well, as a significant impact of clearcutting has not been addressed by the agency.

We also note that it is highly likely that all of the proposed 1012 acres of lodgepole pine stand clearcutting planned for the Bonanza project are either early seral old growth, or mature old growth habitat for wildlife. Thus the agency's

claim that no old growth will be treated in the Bonanza Project is clearly false, and a violation of the NEPA.

15. The HLC RFP and associated FEIS, as well as the Bonanza project NEPA documents, do not address the expected mortality of forest birds from both logging and prescribed fire.

As is noted for the Bonanza project, there will be expansive prescribed burning of treated sites, to reduce fuels and to kill more trees. This mortality to forest birds from smoke toxicity will be a cumulative adverse impact with death of nestling birds from logging, but was not addressed in the HLC RFP or for the Bonanza project. The prescribed burning of treated sites is a standard practice for timber management which was also not addressed in the HLC RFP development of vegetation DCs. Given that almost all vegetation treatments include prescribed or pile burning, any management plans that include these vegetation treatments need to address smoke toxicity to wildlife. However, this impact remains unaddressed in agency resource management activities, including RFP vegetation DCs. There is no science available that supports the absence of smoke toxicity to forest birds, either by direct mortality, including nestlings and newly-fledged birds, or due to reduced fitness of older, mobile birds as a result of compromised physical conditions triggered by smoke toxicity. In addition, the Bonanza project notes that the HLC forest-wide prescribed burning program will result in 800-1200 acres of treatment per year in the Castle GA. The agency needs to address how the effects of this burning program, as well as timber management, is expected to impact forest bird mortality, along with death from logging. This is required not just by the NEPA and the NFMA, but by the MBTA as well.

16. The HLC RFP and associated FEIS, as well as the Bonanza project NEPA documents, do not address how exacerbated local climatic conditions will impact wildlife.

Clearcutting and forest thinning will increase ongoing climatic impacts to wildlife, including examples such as more extreme temperatures in both clearcuts and forests, increased mortality of both nestlings and adults due to extreme weather impacts in both clearcuts and forests due to the loss of thermal cover (e.g., more impact from extreme precipitation and wind events), and reduced forage availability to both wildlife and insects (e.g., drying out of vegetation earlier in the year for both wildlife and pollinators, along with reduced conifer seed production due to degraded climatic conditions). These impacts on wildlife and pollinators from forest removal and thinning are likely to have local population impacts due to their reduced ability to complete survival activities, such as foraging, due to heat and/or weather stressor, since activity for wildlife and pollinators will be restricted when temperatures become too high for their tolerance. The Bonanza Wildlife Report "suggests" that wildlife can tolerate both ongoing climate impacts, without any actual documentation, but does not address how these impacts will be exacerbated by the project. There is no such analysis, as well, in the HLC RFP and associated FEIS. What are likely irretrievable impacts of clearcutting and forest thinning has yet to be addressed as per the HLC FRP vegetation DCs, in violation of the NEPA and the NFMA.

Regards,

Sara Johnson, Director, Native Ecosystems Council, PO Box 125, Willow Creek, MT 59760; phone 406-579-3286; sjjohnsonkoa@yahoo.com.

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-459-5936; wildrockies@gmail.com.

sss for

Steve Kelly, Director, Council on Wildlife and Fish, PO Box 4641. Bozeman, MT 59772; phone 406-920-1381; troutcheeks@gmail.com

Lara Johnson, NEC
PO Box 125
Willow Creek, MT
59760

CERTIFIED MAIL®

9589 0710 5270 0699 7296 61

RECEIVED
SEP 09 2024
BY:

Retail

UNITED STATES POSTAL SERVICE®

59645

U.S. POSTAGE PAID
FCM LG ENV
THREE FORKS, MT 59752
SEP 04, 2024

$7.44

RDC 99

R2304W120426-55

Helen Smith, District Ranger
Belt Creek-White Sulphur Springs
Ranger District

PO Box A
White Sulphur Springs, MT

59645