

March 30, 2025

Ms. Helen Smith, District Ranger
White Sulphur Ranger District, Helena-Lewis and Clark National Forest
204 West Folsom White Sulphur Springs, MT 59644

Dear Ms. Smith,

We appreciate the opportunity to comment on the proposed Horsefly Supplemental EA (SEA).

Please accept my following comments on behalf of the Council on Wildlife and Fish, the Alliance for the Wild Rockies, and Native Ecosystems Council.

The assumptions upon which this Project was designed are false and damaging to the long-term health and resiliency of numerous local and migratory species that occupy the project area.

“Purpose and Need.” p. 2, SEA

Need for the Proposal

The purpose and need for action remain the same as outline on page(s) 4-6 in the 2020 Environmental Assessment. The project is focused around the following three primary purposes.

- *Improve forest health and landscape resiliency*
- *Reduce wildfire hazards*
- *Provide wood products to local and regional economies* SEA, p. 3

“Resiliency” is an arbitrary, and undefined/ill defined term imagined or in other words ‘dreamed up’ as a post-hoc justification for clearcutting and “make-work” road work. Fragmenting this already fragmented landscape will not, cannot improve forest resiliency, no matter how many purposefully deceptive terms of art you throw at this destructive Project. Destruction is never Creation, and the USFS has never created anything but death and destruction and cultivation of native forest landscapes into failed, diseased, fire-prone monoculture, tree plantations.

“Management” increases wildfire risk, both frequency and intensity are increased, always. NO baseline wildfire hazard risk was established in the EA of the SEA. With NO baseline to compare end results to, there is no way to measure risk reduction quantitatively or qualitatively. This is mythology, not science.

“Economic values are net-negative”

Stumpage is produced at a net loss to taxpayers. Local and Regional economies receive subsidies, which are delivered until they're not. Congress and the Administrative branch can reduce subsidies, which leaves a huge gap in local and regional revenues. This is not a lumber economy, it is a subsidy-harvesting economy, which is inherently risky and unstable. Revenues are declining as competition for the stumpage decreases every time a mill closes due to unprofitability. There is no 'timber industry' per se, just infusions of timber welfare.

Old growth and old-growth habitat are already below biological minimums to protect and maintain old-growth associated species like woodpeckers, owls, small mammals, rare plants and goshawk. The Project will make it even more difficult to maintain species diversity, the main purpose of NFMA.

The USFS failed to analyze and disclose this decline in old growth, old-growth habitat quantitatively and/or qualitatively, and general declines in goshawk nest sites, and in biological diversity, in violation of NFMA and NEPA.

These lax monitoring procedures violate the NEPA by failing to conform to the provisions outlined in the Forest Plan.

More logging will push diversity down, goshawk populations and old growth as a percentage of the whole forest landscape down too.

The USFS hasn't monitored (field surveys) every goshawk nest site since 2016. This is unlawful, shamefully negligent and in total disregard for old growth species and biological diversity.

To make matters worse the Helen-Lewis and Clark National Forest has not surveyed Goshawk nests since 2020. Goshawk is and MIS (Management Indicator Species) which requires the 100% annual nest site field survey. This failure violates NEPA (National Environmental Policy Act) and the Forest Plan.

What is even more significant is the recent cuts in budget and personnel. The Supplemental EA fails to account for the likely inability of the USFS to complete this project due to lack of sufficient funds and staff. It should have been analyzed and disclosed in the NEPA process.

Thank you for considering our comments.

Sincerely,

Steve Kelly, President, Council on Wildlife and Fish P.O. Box 4641 Bozeman, MT 59772, 406-920-1381, troutcheeks@gmail.com and for;

Mike Garrity Alliance for the Wild Rockies P.O. Box 505 Helena, Montana 59624 406-459-5936 and for;

Sara Johnson Native Ecosystems Council P.O. Box 125 Willow Creek, MT 59760.