District Ranger

3710 Fallon Street Suite C,

Bozeman, MT 59718

April 29, 2025

Dear District Ranger;

Please accept these comments from me on behalf of the Council on Wildlife and Fish, Alliance for the Wild Rockies, and Native Ecosystems Council relating to the proposed Hyalite Cottonwood Hazardous Fuels Reduction Project (Project).

Forest Service must conduct a full environmental impact statement (EIS) for this Project.

The enormous size of the project warrants and EIS. The cumulative environmental effects of past, current (ongoing/overlapping) and future logging by the Forest Service, private and State logging entities, plus the tremendous recreational use levels and mining in the Project area must be analyzed and disclosed wholly and fully. Only an EIS is sufficient to capture the complex, overlapping stressors being perpetually applied to this ecologically sensitive area. Prescribed burning is another significant, and highly destructive agency-induced ecological effect that needs to be analyzed individually and cumulatively. And let us not forget livestock grazing. Cumulative effects analysis of the Hyalite Cottonwood and Bozeman Municipal Watershed Project must also include private commercial and residential subdivision and development.

The behavior of the whole ecosystem cannot be described in terms of the language or qualities that only apply to any one of its parts.

To see a World in a Grain of Sand

And a Heaven in a Wild Flower

Hold Infinity in the palm of your hand

And Eternity in an hour.

- William Blake, "Auguries of Innocence."

There is more to the ecosystem than fuels, fuels and more fuels.

Please provide an understandable analysis of the criteria underlying these specific fuels treatments strategies and tactics. And please explain in plain English the extreme nature of

impact(s) on wildlife, water, old growth, threatened and endangered species (T & E) and wilderness values.

What is the current baseline (quantified and expressed in some numeric form) level of risk being used to measure success in "reducing" risk to the Bozeman water source and community?

How was it determined that this specific combination of "fuels treatments" is required, or optimum, on an area greater than 50% of the landscape. Why not 30%? Or 100%? This seems arbitrary. Is there some formula being used to determine the scope here?

Where are these criteria, or strategy described in programmatic terms in the Forest Plan?

How is it possible to impose this much stress and destruction to 50% of the landscape while still maintaining the rich diversity of wildlife that exists today? There will be tremendous habitat loss, which will lead directly, indirectly and cumulatively to a severe reduction of plant and animal diversity in the Project area. Please explain your thinking and why wildfire mitigation has taken priority over every other forest value in the Project area.

What Emergency?

Why? What criteria was used to determine that this project will be implemented as an ***emergency action***? (Emphasis added). Please explain when this area moved from normal status to emergency status. What event, action, or other external force moved the Project area into emergency category?

Concocting a frame and narrative and promoting it is a public relations (PR) story, false or fiction, either way it fails to meet the legal requirements of the National Environmental Policy Act (NEPA).

Please quantify in numeric terms how this project will reduce property loss. What failed in the Bozeman Municipal Watershed Project that warrants another "bite at the apple?" What makes the Forest Service think this Project will fail, just as the previous attempt to significantly reduce risk failed. What is different? Why is this not an obvious waste of time, money and resources if the Bozeman Municipal Watershed Project did not achieve the risk reduction it promises. What makes you think this outcome will be any different, leading to more and more thinning, logging, burning and roadbuilding in future expanded efforts to achieve the unachievable?

There is no "emergency" only perpetual "active management" for its own sake, and the agency's psychotic drive to domesticate every square inch of forest under its control. You will never control Nature. Never forget, nature bats last!

What Monitoring?

Please in great detail show how monitoring for wildlife has been conducted as per the requirements in the Custer Gallatin Forest Plan (Plan). What site-specific surveys for wildlife are required for this (Project area) landscape?

Please list all species being monitored and compare this to all species that are required to be monitored as per Plan commitments. Are population numbers (field surveys) being recorded annually, and what happens when no individuals that should be present are not found/observed? The Plan is supposed to be grounded in what is described as "adaptive management." This requires rigorous monitoring to work. You've been (presumably) monitoring for changes in wildlife and wildlife habitat since the Plan was revised. What has been revealed by the monitoring plans so far? What monitoring data and analysis is being used to determine the current condition of the forest? What monitoring data and analysis was used to reclassify the Project area and "emergency?"

Which species are showing stress, or displacement, or reduced numbers because of the massive alterations to habitat in the adjacent Bozeman Watershed Project? Are there monitoring reports that can be applied to this Project?

What other monitoring reports of past and current activities has been used to evaluate wildlife impacts for this Project? Please provide all monitoring reports that may be relevant for wildlife in the Project record so the public may review their contents before a Decision is made (NEPA).

Management Paradox.

Please explain in great detail, in common English, how *emergency fuels treatments* can be made to conform to forest-wide Plan Desired Future Conditions (DFCs) goals and objectives for forest vegetation.

Please explain how the Hyalite Cottonwood Project will meet forest-wide DFCs and how emergency fuels treatments and vegetation DFCs can be considered to be identical. NO way!

There are no areas excluded, or exceptions discussed, in the Plan.

Please explain how emergency fuels treatments implement the Plan vegetation DFCs.

Please analyze and disclose how the proposed site-specific methods of vegetative manipulation and sanitation equate to implementation of the Plan vegetation DFCs.

If these treatments being proposed cannot conform to Plan standards and guidelines, a Plan amendment is required.

All emergency actions must comply with Forest Plan direction and the NEPA in the form of an EIS.

Old growth and old-growth habitat.

Please define old growth and old-growth habitat.

Please map the current old growth in this project area, including for potential vegetation group, as per Green et al. (1991), including acres (patch size of each stand) of each representative group.

Please analyze and disclose Plan direction for the Project area. Please explain how Plan direction for old growth and old-growth habitat will be met in the Project area.

What old growth procedural guide are you claiming to be following? Is it the Forest Plan definition?

The following quote explains the "ecologically based classification" methodology. The following quote comes from Green et al. (April, 1992):

Within the Northern Rockies various attempts at old growth definition were made during the Forest planning process. Unfortunately, these efforts continued to follow the definitions being developed in Oregon and Washington or emphasized structural characteristics related to old growth- associated wildlife species. Pfister (1987) conducted the first quantitative analysis based on ecological data for the Northern Rockies. This effort concentrated on the Kootenai and Nez Perce National Forests and provided a structure for the analysis presented in this paper. The analysis provided a basic review of concepts and provided an ecologically based classification of old growth based on numbers of large trees, snags, and down logs and described associated attributes of layers, canopy cover, age, and basal area. Pfister (1987) provided eight recommendations for further analysis, some of which have been ***crucial*** *in conducting the regional level analysis. Emphasis added.*

"FIA Limitations for Old-Growth and Mature Inventory FIA is a national-level and regional-level strategic inventory that provides unbiased estimates of forest attributes over large areas by sampling forests systematically (approximately one plot per 6,000 acres). While the FIA design effectively samples variation in forest composition and structure regionally, rare vegetation types are captured less precisely. Classification error decreases with increasing plot

size and increasing density of the attribute being estimated (Azuma and Monleon 2011). Classification errors of old-growth or mature forest for this national-scale inventory have not been tested.

Furthermore, our use of FIA stand age is imperfect; stand age is straight- forward for young, even-aged forests; for older stands with multiple cohorts or uneven-aged stands, stand age may not correspond to the time since the last major disturbance (Stevens et al. 2016). Old-growth and mature forests are known to contain trees of varying ages. "

FS-1215a Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management Fulfillment of Executive Order 14072, Section 2(b) (April 2023) p. 25

Please let me reiterate key points that must not be ignored when saying: "We're following Green et al. in our old growth/old-growth analysis."

What is required by NEPA and is seldom, if ever, adhered to are the fundamentals provided in Pfister (1977 and 1987), or in other words, **an *ecologically based classification of old growth*** based on numbers of large trees, snags, and down logs and described associated attributes of layers, canopy cover, age, and basal area. *Pfister (1987).* Emphasis added.

Please conduct a proper cumulative effects analysis on old growth and old-growth habitat that includes the entire Bozeman Municipal Watershed project area. Please include the specific methods that will be used to meet the 20-50% of the landscape-level Northern Rockies Historical Range of Variation (HRV) goal for old growth retention.

Roads, roads and more roads.

The currently road density (mi/sq./mi.) in this Project area is off the charts. Scoping indicates more roads in an already over-roaded landscape. Wildlife impacts are significant.

Please sort out and map current road classification and levels of use, including permanent closures and seasonal closures, and the purpose of the closure order.

Obviously, elk habitat effectiveness has been compromised for a long, long time.

How will the Forest Service restore the Hyalite-Cottonwood Project to a minimum 50% habitat effectiveness level? How will the Project meet the Collaborative Recommendations of the USFW and MFWP (2013) for elk management?

Elk security requires contiguous blocks of hiding cover. How will the Bozeman Watershed Project when combined with the proposed Project cumulatively provide 30% of the landscape as elk and big game security? Please analyze and disclose these significant (combined) impacts in the EIS.

Connectivity.

As per Plan direction, please use the best available science to evaluate Project impacts on grizzly bears, lynx, and wolverine. rather than the outdated Lynx Amendment.

Please be aware, lynx habitat connectivity is compromised in areas where "vegetation treatments" occur. How will the Hyalite-Cottonwood Project maintain habitat connectivity for lynx, given that the Project will fragment almost all habitat types altered by thinning, clearcutting, burning and other adverse habitat modification actions.

Please show on a map where suitable connectivity areas (mature and regeneration forest) exist on the landscape today. Please analyze and disclose what the connectivity effectiveness level will be after project implementation, given the extreme habitat fragmentation from roads, logging and burning combined.

The Plan needs to be amended so that the current best science can be applied to lynx conservation and connectivity. The Lynx Amendment is based on science and recommendations for lynx that are 25 years old. Amend the Plan to reflect the best science.

These impacts are significant and similar to actions adversely affecting grizzly and wolverine habitat requirements, especially as reflected by high road densities, habitat fragmentation, loss of connectivity, and loss of hiding cover.

Please consult with U.S. Fish and Wildlife Service for all T & E species, including whitebark pine.

What monitoring and surveys will be done?

What are the Plan monitoring requirements for wildlife for this landscape?

IN addition to big game and T & E species, goshawks and other forest raptors may be present in and around the Hyalite-Cottonwood Project landscape.

What is the current quality of the habitat and please map where suitable habitat remains intact, unscathed from past roadbuilding and logging activity.

A variety of owls and hawks and falcon may be present in the Project area.

Please include all surveys and reports that reflect the occupation of these various bird species in the landscape.

How has the Custer-Gallatin NF monitored cumulative impacts on these forest raptors? Are there raptor surveys from the Bozeman Municipal Watershed Project?

Please estimate the projected, cumulative, habitat loss, and loss of reproductive capacity (breeding activity) affecting these forest raptors. It seems difficult to imagine how the Project will avoid significant adverse impacts?

It is difficult to imagine how massive thinning and roadbuilding will not significantly increase local drought conditions, lower humidity and raise temperatures across the manipulated landscape. These changes will endure for decades. Many birds and large mammals suffer in the added stress from raising temperatures and exposing landscapes to more wind and more fire. Yes, all indications favor more frequent fires, more fire risk, and more wind-driven fire events as a direct result of this Project. This is the opposite of the DFCs and Purpose and Need for the Project.

The government's framing of issues, the narrative and expected outcomes are not supported by the Best Available Science. Please reconsider or do an EIS. Thank you for the opportunity to comment,

Sincerely,

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