



December 9, 2025

Madison Ranger District
Attn: Josh Connors
5 Forest Service Road
Ennis, MT 59729

Dear Josh:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Supplemental EA prepared for the Greenhorn Project.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Beaverhead-Deerlodge National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Greenhorn project area is about 41,900 acres of National Forest System land in the northwest corner of the Gravelly Landscape. The project area includes the drainages of Idaho Creek, Timber Creek, Greenhorn Creek, Warm Springs Creek, and all tributaries of the Ruby River. AFRC submitted Draft EA comments on March 4, 2022, and an objection letter of support on August 1, 2022. In our objection letter of support we stated: *“The Greenhorn landscape was identified as needing restoration treatment in 2010. Since that time a tremendous amount of mortality has occurred in the lodgepole pine and some in the Douglas-fir during those 15 years.” AFRC, while not agreeing with all aspects of the Project, believes it is well past time for implementation and restoration of the land within the Project area.*”

The decision was made in September 2023 to sign and authorize the project; however, the Forest withdrew the decision in April 2025 due to the need to supplement the record. Issues driving the need for supplemental information included a Forest Plan Amendment redesignating Canada lynx habitat, Grizzly bear, listing of the wolverine, and expanding analysis on cumulative effects

regarding other projects. Since the project was withdrawn, several new pieces of information and updates have been added including:

Supplemental Information Included in the new Proposed Action

- An updated proposed action.
- Consideration of recent lynx science.
- Documentation of compliance with Canada lynx habitat forest plan amendment.
- Effects to two new species proposed for ESA listing that were not previously considered are now included, the Proposed Endangered Suckley's cuckoo bumble bee and the Proposed Threatened monarch butterfly.
- Additional analysis on effects to grizzly bear and the new Forest Plan Biological Opinion.
- Status change of the wolverine to Threatened and inclusion of the analysis conducted in the wolverine Biological Assessment.
- Updated R1 sensitive species lists, new species analyzed in detail based on status in the project area include the little brown myotis, Paiute Dancer damselfly, the small-flowered pennycress and the western bumble bee. Species not analyzed in detail were a 'No Effect' determination and documentation is in the respective resource report.
- New ongoing activities considered are: two proposed BLM timber sales, approximately 300 acres, roughly 3 miles north of the project area along Davey Creek, scattered BLM mining exploration proposals, abandoned Mine Lands physical safety closures, and conifer encroachment treatments in upland habitats in this same general vicinity. DNRC has one active timber sale of 40 acres approximately 1 mile north of the project area. The 3 Mile Timber Permit (70 acres) is a proposed project that is approximately 5 miles north of the project area and a few noncommercial treatments involving conifer encroachment removal in upland habitats in these areas. A private land ranch outside of Nevada City, Montana is proposing a small timber sale in the next 2-3 years.
- Updated economics analysis.

The resulting review of supplemental information didn't substantively change the project, in fact the only changes included:

- Removing unit E13 which was implemented under the 2023 decision,
- Feasibility issues led to the removal of unit B2 and a part of B3, as the terrain is unsuitable for prescribed burn operations,
- Align the project with the emergency authority designation area for the Executive Order 14225 Timber Resources.

AFRC continues to support the Greenhorn project as we outlined in our objection letter of support. In that letter we pointed out that while we were disappointed that the Forest opted not to treat more acres commercially in the Draft Decision from the Draft EA, our members are much in need of the 9 MMBF of timber that will come from the 1,048 acres of commercial treatment.

Support of the manufacturing sector that depends on the B-D National Forest should be a consideration in any project development. The National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Montana's

forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about \$300 million annually. The majority of the industry is centered in western Montana where the project is located. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

Issues Assessed

Cumulative Effects Analysis

AFRC believes the Forest did a thorough job of reviewing other work and possible cumulative effects. That included:

- The BLM has a 301-acre Berry Nice timber sale nearby.
- The BLM also has a few mining exploration Notices in the Barton and Alder gulch Drainages.
- The BLM will be conducting conifer encroachment treatments south of Virginia City starting the summer of 2026 with prescribed fire to follow in the spring of 2027.
- DNRC has one active timber sale near the Greenhorn Project on state land outside of the Forest Boundary.
- The WTF ranch (private land) outside of Nevada City, Montana is proposing a small timber sale in the next 2-3 years.

Sensitive Aquatic and Plant List

The Region had updated their Sensitive Aquatic and Plants list. To comply, the Forest had to analyze two additional sensitive aquatic species, Arctic grayling and Paiute Dancer. They also had to analyze the western bumble bee and small-flowered pennycress.

Grizzly Bear, Canada Lynx, and Wolverine

AFRC supports the analysis of three predators found on the Beaverhead-Deerlodge National Forest. See table 8 below.

Table 8: Wildlife Species Determinations

Species	Status	Determination
Grizzly Bear	Threatened	May affect, likely to adversely affect
Canada Lynx	Threatened	May affect, not likely to adversely affect
North American Wolverine	Threatened	May affect, not likely to adversely affect

Canada Lynx Analysis

Earlier this year, the Forest completed the 2025 Forest Plan Canada Lynx Habitat Amendment, which replaced the 2000 lynx habitat and LAU maps with 2020 updated maps. This amendment modified where the 2009 Beaverhead-Deerlodge Land and Resource Management Plan's Wildlife Standard 7 applies on the Forest. The amendment did not propose any active management: all existing forest plan lynx conservation components remain in place. The Greenhorn Vegetation project incorporated the updated habitat maps into the analysis for lynx and was used in the consultation with USFWS. The information in the lynx amendment and associated documents is incorporated by reference into this addendum. There is no information in the 2020 lynx habitat maps that wasn't originally considered in the Greenhorn analysis. This project follows the direction in this amendment.

Grizzly Bear Analysis

The Forest reinitiated consultation on the Forest Plan for Grizzly bears in July 2024 because: 1) the Forest consulted on the maximum motorized access take specified in the 2013 biological opinion; 2) a new methodology was being used throughout the Forest Service Region 1 for assessing the effects of motorized access on grizzly bears for purposes of project level analysis and a new baseline has been established; and 3) it was anticipated the continued expansion of grizzly bears and subsequent home range establishment on the Forest may result in some effects not previously considered. **The Biological Opinion for the Forest Plan (FWS 2025b) determined the effects of the continued implementation of the Forest Plan on grizzly bears are not likely to jeopardize the continued existence of the listed grizzly bear.**

Wolverine

A biological assessment was prepared for the North American Wolverine after the species was listed as threatened in 2024. That update necessitated the removal of burn unit 2B and reduced the acres proposed for treatment that were mapped as maternal/denning habitat. Additionally, maternal and primary habitats are primarily at higher elevations and have relatively low road densities when compared to dispersal habitat, which occupies lower elevation areas with higher levels of human access. Primary and maternal habitats support a wide range of potential wolverine prey, including small and medium-sized mammals, deer, elk, moose, and bighorn sheep. Wolverine dispersal habitat is generally not suitable for the establishment of wolverine home ranges and reproduction.

Carbon and Climate

As outlined in our objection letter of support, AFRC supports the section in the Final EA describing the analysis on the carbon cycle. This proposal addresses site-specific forest health, fish and wildlife habitat trends, and risks that currently exist within the project area. These proposed actions are consistent with adaptation actions and strategies recommended for managing forests in light of climate change (Millar et al. 2007; Joyce et al. 2008; Ryan et al. 2008a).

Most importantly, the analysis shows that Douglas-fir stands are declining in vigor and individual tree growth rates. Some of the lodgepole stands exhibit accelerating mortality and are vulnerable to bark beetle infestations. At this stage of their development, these stands are

borderline net carbon emitters. They are likely sequestering carbon slower than releasing it to the atmosphere.

AFRC still encourages the Forest to incorporate the carbon information we included in our Draft EA comments which briefly states:

“AFRC also believes carbon and carbon sequestration needs consideration in any analysis. We would like to encourage the Forest to consider several documents related to carbon sequestration and to forest management.”

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec,

Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. Ecological Applications, 0(0), 2019, e01979.”

In closing, AFRC believes the Forest adequately addressed the relevant issues in the Supplemental Environmental Assessment for the Greenhorn Project. As stated above, the project has been in the planning stage for over fifteen years, and it's time to get it implemented.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239