

Allison Landro

5 Forest Service Road

Ennis, MT 59729

South Tobacco Roots Vegetation Management Project Comments

This project is located in the south Tobacco Roots under the Special Authority of 2021 Infrastructure Emergency Actions. The proposed activities are aimed to improve forest health and productivity and support rural prosperity in forest communities, as well as to increase timber harvest. The emergency actions are to relieve hazard threatening human health and mitigate threats to the forest.

This project is being developed to treat vegetation in the project area by reducing hazardous fuels, commercial timber harvest and thinning stands using non-commercial methods.

The procedures you intend to follow;

- Reduce risk to community from fire
- Reduce hazardous fuels by modifying vegetation
- Reduce the density of forest
- Reduce hazardous to help the wildfire response
- Support the durability and resilience of forests
- Salvage dead or dying trees
- Use commercial sanitation harvest of trees to control insects or disease

The project purposes; forest products, vegetation management, and fuels management. are to be achieved using an Environmental Assessment. An EA is not adequate when there are ESA listed species, an EIS should be done.

Large amounts of habitat will be impacted and will affect wildlife, including listed species.

Table 1. Summary of proposed vegetation treatments. All values are rounded to the nearest whole number.

Vegetation Management Activity	Total Acres	Total Number of Units
<i>Prescribed Fire (Broadcast burning, jackpot burning, pile burning)</i>	12,420*	84
<i>Clearcut</i>	578	22
<i>Commercial thin</i>	321	8
<i>Pre-commercial thin</i>	1,165	58
<i>Sanitation, salvage, and thin</i>	275	17
<i>Variable density thin</i>	1,537	37

The number of acres affected by prescribed fire and follow up activities on commercial harvest units

- Slashing of residuals
- Thinning small diameter trees
- Broadcast burning in clearcuts
- Material crushing
- Hand or machine piling and burning

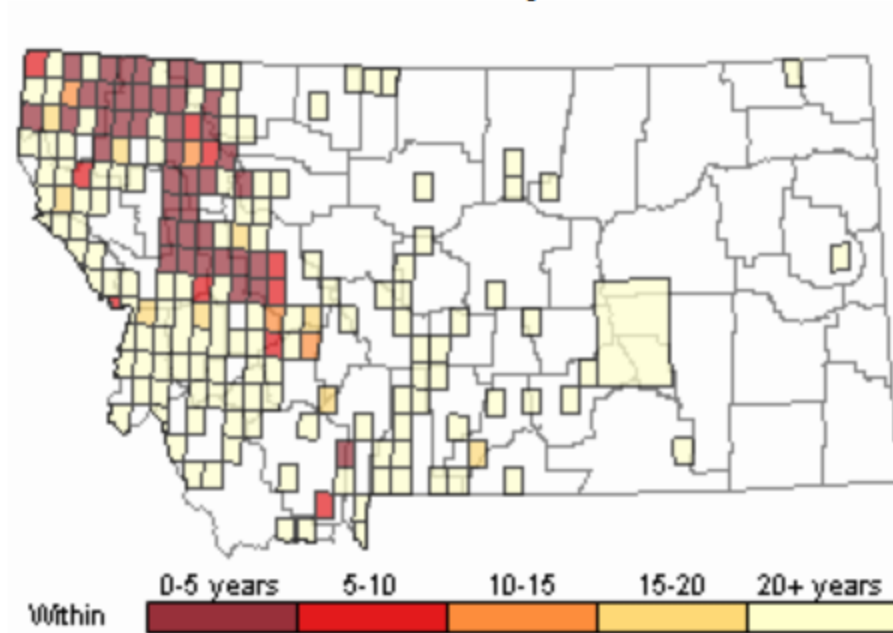
Table 2. Transportation action summary and total miles.

Transportation Action	Total Miles*
<i>New Construction, road reroute for safety and meeting standards for hauling timber</i>	1.3
<i>New Construction, temporary road for access to commercial units, obliterate after use</i>	12.7
<i>Non-system routes, block and sign, stabilize, decommission or obliterate for resource protection</i>	18.8
<i>System route, obliterate for reroute related to new construction</i>	1.1
<i>System route, block and sign, stabilize, decommission or obliterate for resource protection</i>	3.5

The proposed road projects will have an adverse effect on the habitat quality for wildlife. The negative impact of roads is well known on wildlife. These projects will have detrimental effects on all wildlife.

Lynx

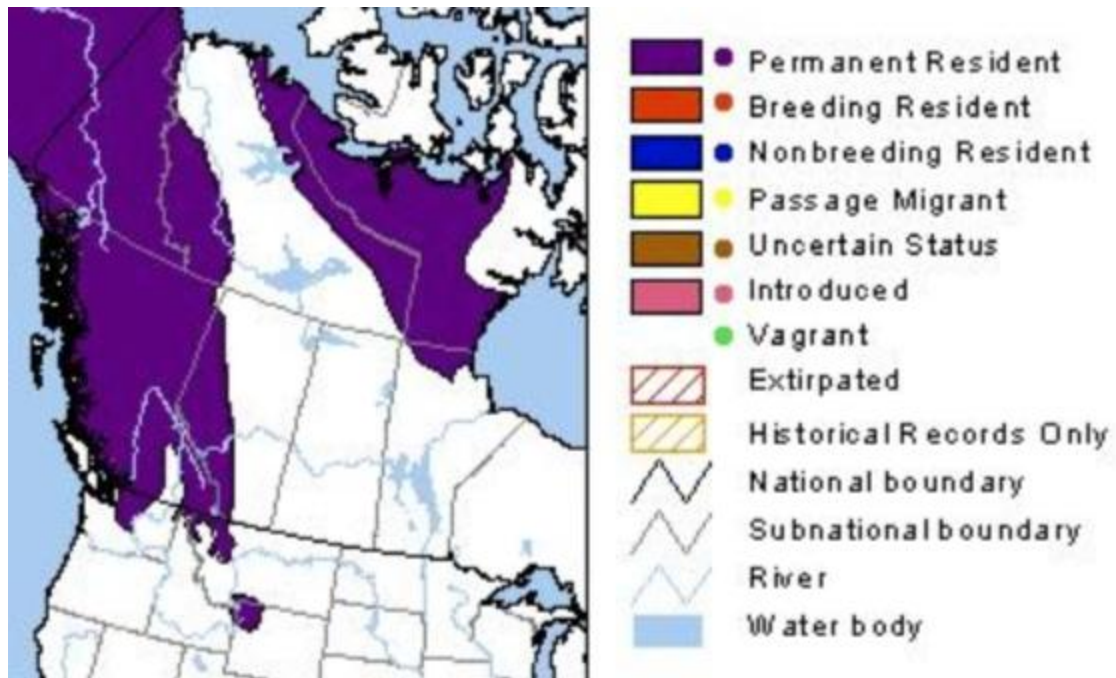
Recency



Two Lynx were noted just north of the project area. This map from Montana Natural Heritage show that they are in the area, probably recently. The point of listing a species is to focus actions to improve the species and that means protection of habitat.

MNH also notes that Canada Lynx avoid large openings but often hunt along edges in areas of dense cover (Ruediger et al. 2000. Canada Lynx require cover for stalking and security, and usually do not cross openings wider than 100 meters (Koehler and Brittell 1990). Your project description does not match the requirements for the lynx. Your vegetation treatments will create conditions that will not create adequate conditions for Lynx.

Grizzly



Grizzly bears were noted in the Tobacco Roots. As is noted in the map above from MNH the Grizzly is not a connected population from the Greater Yellowstone Ecosystem to the Northern Rockies Ecosystem. They have been recently documented in the Salmon Selway and Sapphire ranges. The South Tobacco Roots are an important area of connectivity for all species.

Recency

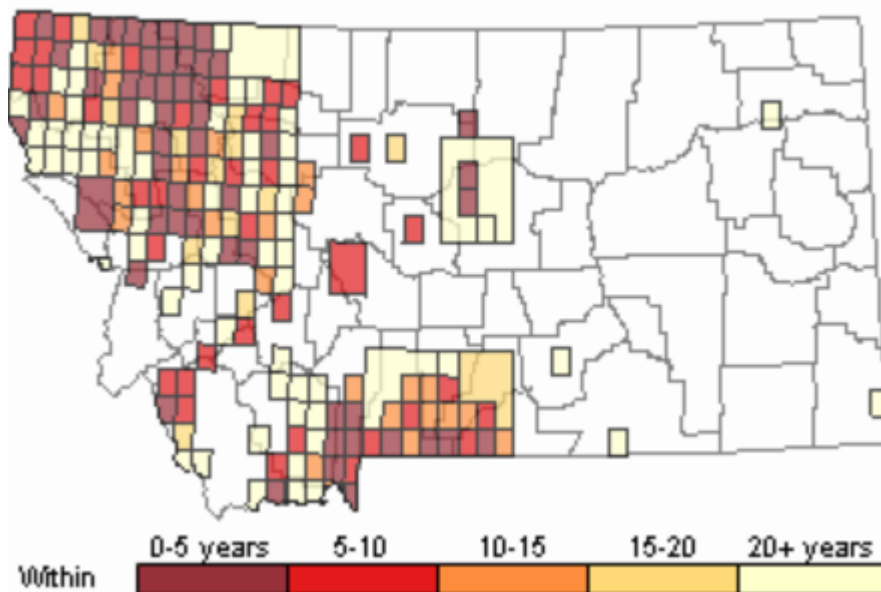


Table 12: Endangered Species Act Listed Wildlife Species Determinations.

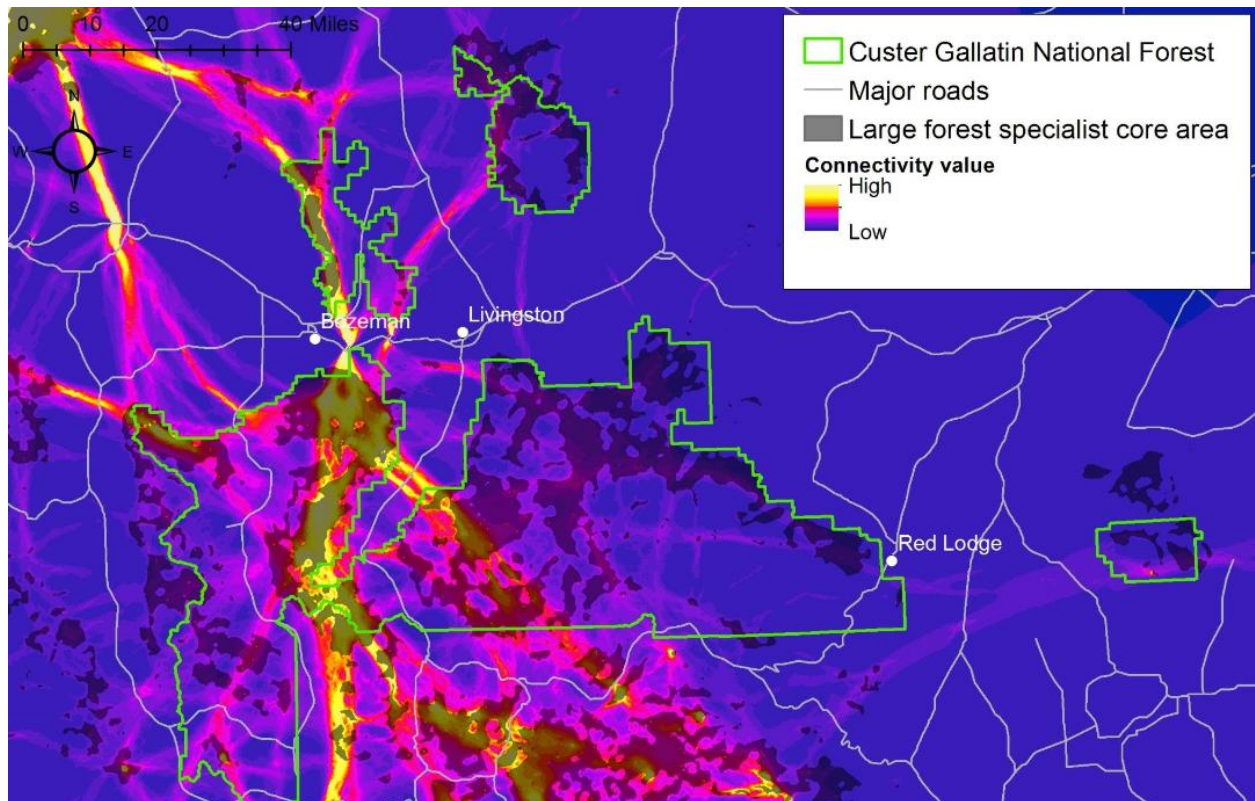
Species	Status	Determination
Grizzly bear (<i>Ursus arctos horribilis</i>)	Threatened	May affect, not likely to adversely affect
Canada lynx (<i>Lynx canadensis</i>)	Threatened	May affect, not likely to adversely affect
North American wolverine (<i>Gulo gulo luscus</i>)	Threatened	May affect, not likely to adversely affect

The Forest Service Determination is not adequate

For the three listed species above your comment that the project may affect but not likely to adversely affect shows no evidence that the project is not likely to affect. Given the fact that much of the area is open to a great deal of recreational use, I don't see how the listed species cannot be affected negatively. The winter use 12-2 to 5-15 and summer 5-16 to 12-1. The South Tobacco Roots are open year round and your project will have huge impacts to listed species.

Wildlife Corridors need protection, especially for listed species

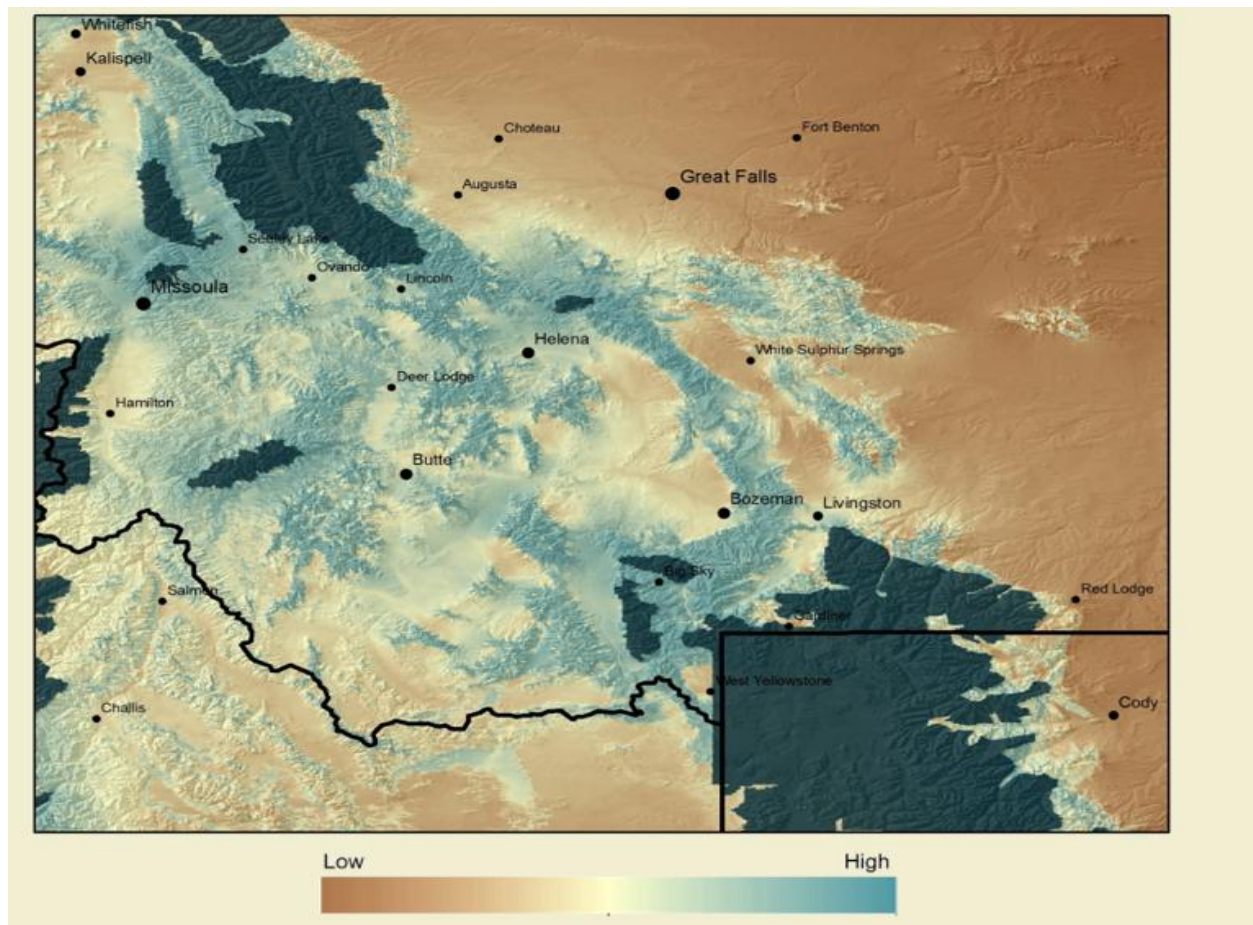
The maps that follow all show how important the Tobacco Roots are for wildlife movement



The map above shows the connectivity value of habitat corridors and the two maps below give more definition and clearly shows the Gravelly Range, the Green Horns and the Tobacco Roots and how important they are for wildlife connectivity.



These maps show the critical link the Tobacco Roots play in wildlife corridor movement.



Defines connectivity as:

Ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments, and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts of species, such as in response to climate change. (36 C.F.R. § 219.19)

The linkages stated above are not protected.

Identifying Corridors among Large Protected Areas in the United States

PLOS ONE DOI:10.1371/journal.pone.0154223 April 22, 2016

- Looking at a US map, roads are everywhere so roadless areas need to be elevated in their importance for biodiversity, roadless areas are treasures

- 100 years ago reserves were enough, now (more than ever) we need to protect what is left by identifying and protecting corridors for wildlife
- We need to complete a system of protected areas
- Where are the wildest lands that are protected (map attached)
- The big job of the conservation community is to connect the protected areas, so that there is better representation of natural diversity
- The wildest, untrammeled/pristine habitats enable species to be more resilient and support all species that should be in that ecosystem
- Wildness can be quantified-data in pixels
- It is key to keep protected areas (YNP, Salmon-Selway, and Northern Rockies) connected
- It is the duty of this generation to protect important corridors
- Focus on the carnivores, they should be the species of focus
- Wilderness Study Areas are wilder than Nation Parks and must be protected

Secure Habitat

The listed species need large roadless areas, especially the grizzly. Lynx habitat is not targeted for treatment, unless it is in the WUI. Please use the legal definition; Public Law 108-148, Healthy Forest Restoration Act of 2003 for WUI requirements.

Use the ESA requirements

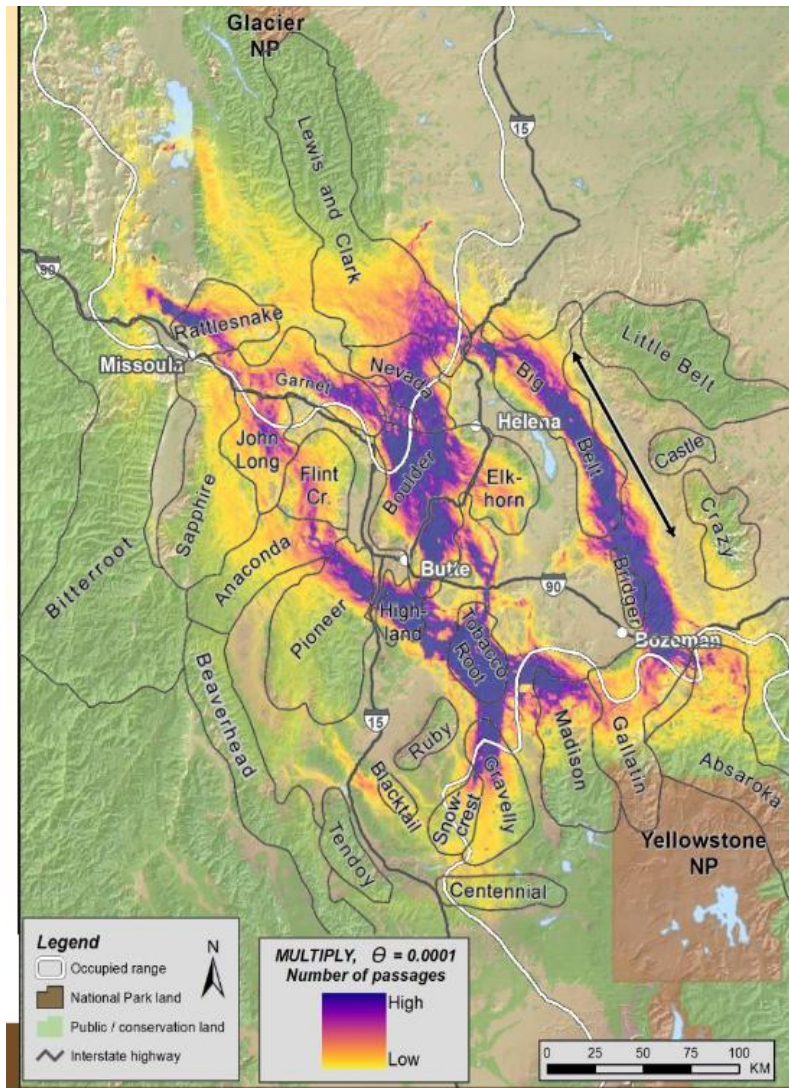
The Canada Lynx, the Grizzly Bear and the Wolverine are threatened species and any modifications to its critical habitat must be evaluated to ensure the action is “not likely to jeopardize” these species.

Endangered Species Act (ESA)

Under the Endangered Species Act (ESA). Section 7(a)(2) of the ESA requires federal agencies to consult with the Fish and Wildlife Service and/or National Marine Fisheries Service

section 7 consultation must cover the overall effects of the entire project at the initial stage before the project can commence.

Section 7 prohibits federal agencies from taking actions that may result in the destruction or adverse modification” of critical habitat. In *Center for Native Ecosystems v. Cables*, **the court held that critical habitat is adversely modified by any actions “that adversely affect a species” recovery and the ultimate goal of delisting**



Peck, C. P., et al. 2017. Potential paths for male-mediated gene flow to and from an isolated **grizzly bear** population. *Ecosphere* 8(10):e01969.

The Tobacco Roots are a critical link for the ESA listed grizzly from the Greater Yellowstone Ecosystem to the Northern Rockies Ecosystem. This diagram shows the Tobacco Roots as a high value path.

The linkages stated above are not protected.

Climate Change

Climate change is also a factor that must be considered, but I see no mention of how CC will impact the South Tobacco Roots and how CC will impact forest project areas. .

Fire science is clear

- 85% of fires are human caused
- Most fires occur within 50 feet of roads
- The logging projects describe will not reduce the fires you want to stop, and with over 12,000 acres treated with prescribed burning
- The area is open year round, meaning people will be up there all the time, and with 85% human caused, and I fail to see how the treatments will save the area.

Aplet et al. *Fire Ecology* (2026) 22:8
<https://doi.org/10.1186/s42408-026-00450-2>

Fire Ecology



RESEARCH

Open Access

Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads



Gregory H. Aplet^{1*}, Phil Hartger¹ and Matthew S. Dietz²

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Nancy Schultz

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Comments are made on behalf of Gallatin Yellowstone Wilderness Alliance.

I am also a board member of Gallatin Wildlife Association

