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First name: Sara
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Organization: Native Ecosystems Council
Title: Director
Comments: July 14, 2022Custer-Gallatin National ForestPO Box 130Bozeman, MT 59715RE: COMMENTS ON THE PROPOSED RED LODGE MOUNTAIN FUELS PROJECT ONTHE BEARTOOTH RANGER DISTRICTHello,Native Ecosystems Council and the Alliance for the Wild Rockies would like toprovide the following comments and concerns in regards to the proposed RedLodge Mountain Fuels Project to be implemented on the Beartooth RangerDistrict.1. Please include an action alternative that promotes wildlife, including elk,wolverine, grizzly bears, lynx, and songbirds, including those associatedwith old growth and snags.The scoping letter indicates that the proposed Red Lodge Mountain Fuels Projectwill protect structures, including at the ski area and in Red Lodge, from fire.Please note that this is a controversial claim, and as such, the agency needs toprovide other alternatives that do not require the sacrifice of wildlife habitat forquestionable benefits. Also, for a fuels alternative, please provide the body ofcurrent science that supports the claims that these treatments, including newroads and fuel breaks, will significantly reduce the risk of human structures to fire.What this project will actually do is increase the fire risk to the ski area, and donothing to reduce fire risk to Red Lodge. Please address this concern, and showwhy it is not a valid issue given that the proposed fuel treatments will requiresevere impacts on wildlife, including the grizzly bear, lynx, wolverine, and elk.2. Please include large-scale maps that can be printed out to include all theimportant information for the Red Lodge Mountain Project; these mapsshould define all the proposed treatment types.To enhance public review of the proposed project, we would like to have theupcoming National Environmental Policy Act (NEPA) analysis provide easily-readand easily-printed out maps of the proposed treatments, with all the proposedtreatment types actually identified, including burning. The maps provided withthe scoping document included a lot of unnecessary information which limitedthe quality of information regarding proposed units. This also made it verydifficult to print out a readable map of all the units. Please make the maps "userfriendly" for everyone.3. Please include a complete analysis of all planned and ongoing projectswithin the Red Lodge Mountain project area, including the planned GreaterRed Lodge Area Vegetation and Habitat Management Project, which is alsoproposed within the Red Lodge Mountain Project Area.The proposed project includes many planned harvest units and some roads forthe Greater Red Lodge Area Vegetation and Habitat Management Project. Pleaseinclude an assessment of direct impacts to wildlife that addresses thesepreviously-planned units and roads, as well as time lines for both projects.4. Please address specifically as to how fuels are being managed in the RedLodge Mountain Project Area, including previously-planned treatments, todemonstrate to the public that there is a scientifically-based method fordesigning fuels treatments to achieve a specific level of effectiveness.Every logging project the agency designs is supposedly to reduce fires. However,there are never any actual criteria as to what percentage of the landscape needsto have fuels reduced to achieve what level of fire prevention. Please provide arange of fuels alternatives that provide different levels of claimed effectivenessfor fire protection, including for the ski area and the town of Red Lodge. If fuelstreatments are expected to protect human structures, surely there are differentlevels of treatments to achieve different levels of protection. And since thegreater the level of fuels treatments, the greater will be the impact on wildlife.The agency needs to provide a range of alternatives to show how these 2 factorsare being balanced out and/or considered by the agency. This is important sincewe are identifying a public issue of maintaining wildlife, including the threatenedgrizzly bear and Canada lynx, the proposed wolverine, and an economicallyimportantspecies, elk and mule deer.5. Please provide an assessment of project impacts on an economicallyimportantspecies, elk, in the project area as well as the cumulative effectsarea that includes the state lands and the entire project area for the GreatRed Lodge Area Vegetation and Habitat Management Project.Please implement the recommendations regarding the current best science forelk that were developed in a collaborative report with the Forest Service andMontana Fish, Wildlife and Parks in 2013. Please identify the current and plannedlevels of hiding cover, and define what the habitat effectiveness will be before,during and after all projects are implemented in the project and cumulativeeffects area, including adjacent State lands. Please provide a measure and map ofelk security as defined by the Hillis Paradigm, for the current and planned levels inthe project and cumulative effects area. Please provide the information needed

toaddress the current level of elk vulnerability in this hunting district, such asbull/cow ratios over the last dozen or more years.Please map and define the current acreage of all current elk, mule deer andmoose winter range, and measure how all projects in the project area andcumulative effects area will affect these big game populations based on the levelof winter range being provided. As for mule deer winter range, please define howprescribed burning maintains or improves a key winter forage species for thesedeer, which is sagebrush as well as some conifer use. What level of reduction ofwinter ranges for these big game species is considered tolerable for the currentpopulation, and how is this being determined?6. Please provide an assessment of how all projects in the project andcumulative effects area will impact songbirds associated with old growthforests as defined by Region 1 criteria as per Green et al. (1991).Please summarize and map all existing old growth as per Green et al. (1991) in theproject and cumulative effects area, and define how all projects planned in thislandscape by the Forest Service will affect birds associated with old growth. Thisincludes at least 15 bird species associated with old growth forests. The currentbest science indicates that 20-25% old growth is needed for maintainingpopulations of these associated species. Does this level of old growth occur in theproject and cumulative effects area. If not, why don't significant adverse impactsalready exist for western forest birds associated with old growth? How will thisproject address this public issue of maintaining old growth for western forestbirds? Please include an action alternative that provides this level of old growth atsuitable elevations for forest birds.7. Please provide an assessment of how all projects in the project andcumulative effects area will impact songbirds associated with forested snaghabitat.There are at least 20 western forest bird species that use snags, largely snagslocated within forest habitat. Please assess how the proposed forest thinning andclearcutting will affect the local distribution of these species. Also, please definehow the agency will balance out the goal of fuels reduction with the requirementof these forest birds for not only forested snags, but for wildfire that creates snagforests. What level of forested snag habitat is required at the project area level tomaintain these species in the affected landscape, and if this is not implementedfor the project, how will significant adverse impacts be avoided for western forestbirds? We would request that the agency not state that snags will be left in
harvest units to address viability of these 20 species of western forest birds, andthey require snags within forests, not within harvest units.8. Please provide a thorough analysis to the public as to all the long-termrequirements that will be needed in order to maintain the proposedreduced levels of fuels on roughly 2000 acres in the project area.We assume that since the agency believes it is essential to reduce fuels on roughly2000 acres, or a third of the landscape surrounding the Red Lodge ski area, thatthe agency plans to maintain these low levels of fuels over time. The agencyneeds to define specifically how this will be done over the long-term. What will bethe future treatments in all the proposed harvest units in the future? If theseareas will require endless, perpetual treatments, this needs to be assessed as percumulative effects on wildlife. This includes the required road densities, as well aswhat is likely a permanent removal of habitat for western forest birds, andrelatively permanent disturbances to other wildlife, including the grizzly bear,lynx, and wolverine. The complete impacts of implementing a fuels reductionprogram need to be fully defined to the public, not just the initial treatments, andhow such a program will still maintain wildlife. It appears that the agency isdeciding to exclude wildlife management from this project area, and this decisionneeds to be fully defined to the public.9. Please provide a thorough assessment and description of how all currentroads, including temporary roads in the project and cumulative effectsarea, as well as the "'fuel breaks," will affect wildlife security and mortalityrisks.The Red Lodge Mountain Project includes many new miles of temporary roads, as
well as an undisclosed mileage of fuel breaks, which at a minimum can be definedas motorized trails, that will have to be maintained as open trails in perpetuity ifthey are to function as fuel breaks. The total miles of fuel breaks need to beidentified, and their effect on wildlife along with roads and other motorized trails,on wildlife, from the grizzly bear, lynx and wolverine to elk need to be defined tothe public. If the agency is going to claim that the fuel breaks and temporaryroads will have no motorized use after project completion, the basis for this claimneeds to be provided. If there is no illegal motorized use occurring on agencyroads in this landscape, this needs to be substantiated. We note that Region 1developed Int~rim guidelines for management of threatened and sensitivewildlife species in 1991. These recommendations include maintaining no morethan a mile of motorized access per section for the lynx and wolverine. Thecurrent best science recommends no more than a mile of motorized routes forthe grizzly bear, and 60% of the landscape as security. It is unclear that thesehabitat recommendations can be met in the Red Lodge Mountain project orcumulative effects area, especially without

washing out impacts by includingroadless lands. For elk, optimal habitat has no more than about a mile of activemotorized routes per section, while over 2 miles per section of active motorizedroutes significantly reduces elk use. Again, it does not appear that maintaining elkhabitat can be achieved with the current proposal.Please include an action alternative that provides recommended levels of activemotorized routes to wildlife in the Red Lodge Mountain Project Area; thisalternative needs to include the level that would occur during and after projectcompletion, including estimated levels of illegal motorized use on temporaryroads and on fuel breaks.10.Please address how the project will impact wolverine prey species, as thesnowshoe hare, and carrion on big game winter ranges, as well asdisplacement effects of roads and motorized trails.The proposed project and cumulative reductions of big game winter ranges,including moose, mule deer and elk, need to be assessment as to forageavailability for the proposed wolverine. This species is highly dependent uponwinter carrion on big game winter ranges, as well as spring ranges, for wintersurvival. What would the level of reduced carrion availability for wolverine be inregards to direct and cumulative impacts in the project and cumulative effectsarea, for wolverine? What level of reduction would be considered a significanteffect? Also, what level of reductions in snowshoe hares and red squirrels isexpected in the project and cumulative effects area, and again, how is the level ofsignificance on wolverine going to be measured. If fuels reduction is going to be apermanent activity in this landscape, what does that imply for wolverinepersistence? How can this loss of habitat be mitigated? And as we notedpreviously, th~ wolverine is sensitive to motorized routes. What project designswill address this effect? Please include an alternative where the recommendedlevel of no more than one mile per section of active motorized routes is going tobe met.11. Please define the current distribution, acreage, and abundance ofwhitebark pine in the Red Lodge Mountain Project Area, including maps,and define how the project will have no significant adverse impacts on thistree species.There is current science that indicates that a variety of logging treatments inwhitebark pine have failed to create regeneration of this species for up to andover 40 years. There is also science to indicate that thinning of whitebark pinestands increases, not decreases, the risk to pine beetles. So we are interested inhow this species, which is proposed for listing under the Endangered Species Act(ESA) is going to be impacted by the Red Lodge Mountain Project. If logging andburning treatments are going to be claimed as promotion of this species, werequest that the relevant research be provided.12.Please provide a thorough summary of the current grizzly bear use in theRed Lodge Mountain Project and cumulative effects area, and define howconservation of this threatened species will be promoted with theproposed land management activities.The current best science recommends no more than a mile of motorized routesper section in grizzly bear habitat. It is also recommended that there be at least60% of a given landscape that provides core security habitat, with each core areabeing at least 2500 acres. Please define how these recommendations will or willnot be met in the Red Lodge Mountain Project and cumulative effects area, and ifthese recommendations will not be met, what mitigation is planned to avoid
significant habitat losses for this species? Also address how the project, includingboth roads and fuel breaks and associated illegal motorized use as well as foottraffic by hunters, will impact the mortality risk to local grizzly bears. If long-termrisks of mortality to the grizzly bear are expected, how will this affect thepopulation of bears in this landscape and within the Greater YellowstoneEcosystem?Please include an action alternative the meets these recommendations and thuspromote the conservation of this threatened species in currently-occupiedhabitat. We request that security areas be well distributed across this landscape,and not relegated to sterile high elevation areas, including those that are steepand have been severely impacted by fire. The security areas should be consistentwith known grizzly bear use in the project and cumulative effects area.13. Please define the Wildland Urban Interface (WUI) for the Red LodgeMountain Project Area by the required definitions.There are specific requirements for delineating the WUI. Please map this area(s)correctly for the Red Lodge Mountain Project Area.14. If the agency is going to remap lynx habitat for the landscape that includesthe Red Mountain Fuels Project, this remapping requires publicinvolvement, which to date has not been done.The past re-mapping for lynx habitat in the landscape of the Red Mountain FuelsProject, including the previously-evaluated Greater Red Lodge Area Vegetationand Habitat Management Project, has never been through public involvement.Until this public involvement requirement of the NEPA is completed, anymanagement of lynx habitat in this landscape is a violation of the NEPA. We alsorequest that in this public involvement, public comments and review are essentialso that the current best science can be addressed.We also note that the Northern Rockies Lynx Management Direction (LynxAmendment) including the 6% allowance of lynx habitat loss in the WUI, is

notonly extremely outdated as per the current best science, but has never beenvalidated with any monitoring as to effectiveness. This lack of effectivenessmonitoring, J.,hich is a violation of the National Forest Management Act (NFMA) isnoted in the 2018 Species Status Assessment for lynx completed by the U.S. Fishand Wildlife Service. Until this direction is verified as maintaining and conservinglynx, it should not be applied to lynx habitat, especially lynx critical habitat asoccurs in the Red Lodge Mountain project and cumulative effects area. Betweenthe outdated management direction provided in the Lynx Amendment, and theremapping of lynx habitat in the Red Lodge Mountain landscape by the ForestService, lynx persistence in this landscape is in jeopardy, which is a significantadverse impact that requires an environmental impact statement (EIS).Regards,Sara Johnson, Director, Native Ecosystems CouncilMike Garrity, Director, Alliance for the Wild RockiesJason Christensen, Director, Yellowstone to Uintas Connection