Data Submitted (UTC 11): 2/5/2024 7:00:00 AM
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Comments: Re: Comments on the Granite Goose Landscape Restoration Project #63507 Draft Environmental AssessmentThe Granite Goose Project on the Payette National Forest proposes a mishmash of activities in a 39,000-acre landscape. The activities range from small scale, and seemingly innocuous, recreation-related actions, to a massive timber harvest proposal. The proposed watershed restoration activities appear discretionary, any benefits are unclear.The Granite Goose Project Draft Environmental Assessment (EA) fails to support the purpose and need for the project; provides a totally inadequate analysis lacking in any reference to Best Available Science (BAS); and violates law, regulation, and policy.Most of my career, I worked for the USFS as a biologist, ecologist, and planner. I am now retired and submit the following comments as a private citizen. Underlined comments highlight my concerns and issues to be addressed in the final EA.Bear Basin Winter ClosureThe Granite Goose (GG) Project includes one minor, but important action: the designation of the Bear Basin area for non-motorized use in winter."2.2.4.4.2 Bear BasinA winter closure to over-snow vehicle use near the Bear Basin Nordic Ski area that includes the Payette Lake Ski Club permit boundary (approximately 1,269 acres) is proposed (see map 20 in appendix A). The closure would not affect over-snow use permitted for operation and maintenance of the Nordic ski area. This action would close the area to over-snow vehicle use to reduce user conflict, increase safety, and reduce impacts to permittee investments in Bear Basin. The proposed closure boundary would be offset from the National Forest System boundary on the south, and the highway on the west to allow for over-snow vehicle access to the groomed over-snow vehicle routes. (p. 24)"This designation is long overdue. The Payette National Forest (PNF) began a comprehensive winter travel management plan nearly 20 years ago. The plan proposed a number of areas to be open or closed to various types of winter recreation. This effort was shelved, in part to gather information on the effects of winter recreation on wolverine. Subsequently, a major study on the topic was completed (Heinemeyer et al. 2019).Unlike many of the other activities proposed in the GG Project, decisions for winter recreation that do not impact wolverines should move forward. The Bear Basin area is outside wolverine habitat. Scores of recreational users of the PNF lands support the closure. Make that key decision and move on. Activities that Affect Winter Recreation in Wolverine HabitatAny activities that would increase winter recreation use and potential impacts to wolverines and wolverine habitat must be fully analyzed and disclosed, including Best Available Science (BAS) to support any decision. The Granite Goose Project could impact wolverines by 1) increasing recreation use through an expanded snowmobile parking lot, 2) building roads for timber harvest that subsequently provide additional winter recreation use (by snowmobilers and backcountry skiers), and 3) thinning and clearcutting forests, thereby allowing for expanded winter recreation use in wolverine habitat. Items 2 & 3 are discussed in greater detail later in this comment letter.A potentially significant addition to winter recreation use is proposed under other Recreation Improvements (p. 23): "Expand the Gordon Titus winter parking lot by up to 3.5 acres." When the original parking lot was analyzed it garnered a substantial environmental analysis - all to itself. Now the PNF proposes to double the size of the parking lot, with no consideration of how a larger lot might affect recreation use levels in wolverine habitat. There also is no consideration of effects to wetlands or other forest resources. I use snowmobiles to access the backcountry for skiing and recognize that the Gordon Titus parking lot is often full, but it should not be expanded without due consideration of effects.One solution to item #1, is for the PNF to complete a comprehensive winter travel plan., as directed by the Travel Management Rule and subsequent 2015 Over-snow Vehicle Rule. As noted above, the PNF began a comprehensive winter travel management plan nearly 20 years ago. The plan was sidetracked, in part, because some groups argued there was insufficient scientific research to support high elevation closures for wolverine conservation. Subsequently, a landmark study was completed on this topic supported by the PNF and other forests in Idaho (Heinemeyer et al. 2019.) This study informed the recent decision by the USFWS to list the wolverine as threatened (87 FR 71557.)Without that plan, the PNF must at least fully consider how winter recreation and travel activities in the Granite Goose Project would affect wolverine.The EA fails to justify the large scale timber harvest and fuels treatments and fails to meet NEPA requirements for analysis and disclosureCondition Based Management Analyses Do Not Meet the Requirements

of the NEPAIn comment letters, many people have focused on the (very minor, but valid) Bear Basin portion of the project, and have "not seen the forest for the trees."The GG Project proposes to treat up to 36,000 acres with prescribed fire and thinning and 10,000 acres with timber harvest, based on the purported need to reduce risk of wildfire. The majority of the treatments would occur in higher elevation forest types. All this with virtually no supporting analysis or BAS information. I could provide pages of examples of how the GG Project EA is inadequate, insufficient, contrary, vague, and unsupported by any research data. Due to exhaustion, I'll limit myself to some examples below.Most of the proposed activities in the GG Project are poorly described and substantiated. The PNF appears to be using the "condition-based management" approach in the GG Project. In the past few years, the U.S. Forest Service (USFS) has attempted to use condition-based management (CBM) in which agencies put off evaluating or disclosing the "where," "when," and "how" of projects until after the agency has approved them. Environmental analyses completed using CBM have been determined to be insufficient and in violation of federal law.Under the National Environmental Policy Act (NEPA), federal land management agencies (such as the USFS) must analyze and disclose to the public the impacts to forest lands before approving project activities such as logging and road building. Condition-based management could be useful, after the full range of conditions, treatments, and effects are fully disclosed and analyzed using BAS in an environmental analysis. Instead, recent USFS environmental analyses have avoided providing any specific information or supporting research. This is certainly the case with the GG Project EA.The CBM approach makes it impossible for the public or agency decision-makers to understand how our public lands will be affected by the proposed actions. This severely hampers the public's ability to respond to, and the agency's ability to understand, project impacts. The NEPA is clear that details must be available before actions are taken to allow for informed decision-making. The NEPA requires the USFS to fully analyze and consider the specific impacts of the GG Project (including the cumulative impacts of other forest projects, as well as a variety of reasonable alternatives.)As evidenced by the Draft GG Project EA, the CBM approach fails to meet the requirements of the NEPA because the agency never takes the requisite "hard look at the environmental consequences' and on "the environmental effects of proposed agency action." Vague statements and conclusions about the environmental impacts of a project that is predicted to last for more than 30 years and deferring decisions on treatments to the future with no additional NEPA review violates NEPA.The Need and Effectiveness of Proposed Treatments in Higher Elevation and/or Moister Forests, with historically longer fire return intervals, is Not SubstantiatedDuring my career, I oversaw the analysis and documentation for many projects designed to reduce wildfire risk. Substantial research and management have shown that treatments, such as thinning and prescribed fire, can reduce risk in dry, lower-elevation forest types, particularly ponderosa pine forests. There is a far less clarity on the effectiveness of treatments in higher-elevation forests that burn infrequently (150+ yrs), at larger scales, and with greater intensity (see Bradley et al. 2016.)conditions within the project area. This project would implement vegetation and fuels treatments to address hazardous fuels to reduce the risk of uncharacteristic wildfire, respond to insect and disease outbreaks, and promote whitebark pine (Pinus albicaulis), aspen (Populus tremuloides), and meadow conservation in the project area." Laudable goals, but the devil is in the details. The majority of the proposed harvest treatments would occur in higher elevation potential vegetation groups (PVGs):'The lack of wildfire within the project area has resulted in similar stand structures. In potential vegetation groups PVGs 6, 7, 8, 9 and 10, which represent 76 percent of the project area's vegetation, there is over-representation of the large tree size class."As anyone knows whose been following USFS projects and forest management for the past 50 years: "over-representation of large trees," often results in timber harvest with subsequent habitat loss for wildlife species that depend on older and more dense forest conditions.The project proposes more than 10,000 acres of timber harvest through commercial thinning (4,670 acres), sanitation/salvage (1,030 acres), and regeneration (aka "clearcutting")(3,330 acres) (Table 3, p. 9.)About 1,900 acres would be treated for whitebark pine restoration - a supposedly beneficial activity using treatments described in Tombeck et al. 2022. But the draft EA fails to acknowledge that whitebark pine restoration is experimental and that monitoring is necessary to validate or disprove restoration actions (Tombeck et al. 2022.) The publication states: A monitoring plan must be developed in concert with restoration project planning[hellip].Furthermore, assessment of the effectiveness of a restoration project requires clear, measurable management objectives that are identified in the project planning phase."Nor can we assess whether these treatments have been agreed to in consultation with the Fish and Wildlife Service (FWS) in a Biological

Assessment (see p. 58, bold added): "6.1 Endangered Species Act - Consultation with the U.S. Fish and Wildlife Service is ongoing. A biological assessment will be submitted and will include determinations for whitebark pine, Canada lynx, wolverine,[hellip]." While Biological Assessments and consultation are generally completed along with the final EA, it is ludicrous for the PNF to propose a project ostensibly focused on the restoration of an endangered species without input from the FWS.The Purpose and Need section (pp 3) states weakly: "Therefore, these late seral vegetation conditions may (emphasis added) be more at risk to stand replacing fires and insect or disease outbreak." No supporting documentation is provided, as is the case throughout the analysis.Wildlife habitat is mentioned on p. 4 of the Purpose and Need section: "There is a need to maintain and promote dry, lower elevation, large and medium tree size class for the associated wildlife species (Forest Plan: WIOB07)." But, the vast majority of timber harvest treatments would occur in wet PVG 6 and higher elevation PVGs 7, 8, 9 and 10, where any purported benefits to wildlife are unsupported. One species of great concern is the wolverine which was recently listed under the ESA (88 Fed. Reg. 83,726 (Nov. 30, 2023). I'll address this issue later in my comment letter.It is unfortunate that a key method to reduce fire risk was vetoed by Idaho Dept. of Lands (p. 6.) In Idaho, where many private lands are adjacent to state lands, the difference in valid treatments on state and NFS lands has great implications for protection of private property from wildlife fire risk. Please explain why the Granite Goose EA proposes to spend Wyden funds on state lands if the proper treatments cannot occur."1.5.1 Vegetation and Fuels Management ChangesIn consultation with the Idaho Department of Lands, shaded fuelbreaks and infrastructure protection treatments were removed from state lands as they do not align with the state's management objective."Even more unfortunate is the addition of non-incidental timber harvest in IRAs, with dubious ecological veracity in roadless areas (p. 6). The EA must fully explain and substantiate why and how the speculative treatments are necessary in roadless areas."1.5.2 Vegetation Treatments in Idaho Roadless AreasIncidental timber removal was proposed during scoping for the implementation of whitebark pine restoration treatments, non-commercial thinning, shaded fuelbreaks, meadow encroachment, aspen treatments, and prescribed fire. Nonincidental timber removal in Idaho roadless areas was added to the proposed action to maintain or restore the characteristics of ecosystem composition, structure, andprocesses by addressing the insect and disease outbreaks in the Idaho roadless areas and to reduce the risk of uncharacteristic wildland fire effects to an at-risk community and municipal water supply system."The alternatives description continues with a lack of specificity. This does not meet the requirements of NEPA to support an informed analysis:2.2.1.4 Implementation Plan for Vegetation and Fuels ManagementTreatment proposals (table 3 and table 4) were developed using on-the-ground and remote sensing data but ground validation would be necessary to finalize treatment locations and treatment arrangement. Final treatment type or location may differ from what has been proposed (map 7 in appendix A). To guide treatment selection and to ensure that the appropriate treatments are applied, an implementation plan was developed. The implementation plan presents information on what conditions would be evaluated to assign various treatments to achieve the desired conditions.The implementation plan would provide flexibility while ensuring that treatments align with conditions on the ground. Refer to the implementation plan in appendix EOf particular concern is the assurance that an implementation plan would "ensure that the appropriate treatments are applied." A review of the plan and checklist (Table 38 in Appendix E) is not reassuring. The information to be gathered to inform implementation should have been obtained and analyzed before the environmental analysis was started. It is hard to believe that the PNF resource specialists will have the time and funds to do a sufficient job afterwards.Road and Trail Management (p. 19) adds 19.4 miles of unauthorized routes to the NFS. "The planning team determined that 19.4 miles of additional National Forest System Roads are needed in the project area. The added roads result from 16.5 miles of added existing routes and 5.2 miles of new construction." This is contrary to USFS direction that encourages a minimal road system.After making grandiose plans in the purpose and need section, the EA proceeds to describe the Affected Environment (Chapter 3) in 7 pages! I worked for many years as a planner for the USFS and agree that many of our environmental analyses were too long and cumbersome, but to propose a project of this scope and scale and pretend the Affected Environment can be adequately described in 7 pages is incomprehensible and fails to meet requirements of the NEPA.The 1/2 page description of the vegetative conditions, even for someone familiar with the PNF PVGs, is confusing and totally inadequate. The numbers in Ch. 3 also don't match numbers presented in Tables 39-45 in Appendix G. The only hint we are given in this section that tables with numbers exist is the following statement (p. 25): "For greater detail on the existing and desired species composition conditions within

PVGs 5 to 8 (which are the dominant potential vegetation groups within the project area), refer to table 39 in appendix G."The 1/2 page description of fuels - the main driver for the purpose and need for the project - is so meager it couldn't pass muster as a grade school report. Broad statements are made: "Thus, 40 percent of the project area (16,043 acres) is moderately or highly departed from historic vegetation conditions," with no supporting documentation, analyses, or references.The botany section is slightly better. Here we learn that of the 5,500 acres of suitable habitat for whitebark pine (restoration of which is also a main driver for the project), "fiftynine percent of habitat is typed as replacement fire regime". And the project implies that prescribed fire might occur on these highly-flammable acres (recall that the proposal is for prescribed fire on all acres in the project area.)The wildlife section provides a table (13) that purportedly displays the amount of habitat for MIS and sensitive species, but gives no account of how these numbers were determined.Recreation, another supposedly big driver for the project, is described in 2 paragraphs and fails to mention the large nordic skiing community or the avid backcountry skiers that use the project area.The effects analysis is a key part of an environmental assessment. Unfortunately, Chapter 4 Environmental Consequences of the Alternatives continues with the woefully inadequate analysis. Where is the use (or recognition) of Best Available Scientific information, Forest Plan direction, or description of the analyses? I've tallied the number of scientific references by section: Vegetation = 0, Fuels = 0, Botany = 1, Soils = 4, Hydrology = 10, Wildlife = 0. How can the public provide meaningful input without knowing the supporting scientific research. Hugely important decisions, (Like dealing with climate change or protecting rare species) have been sidelined due to "lack of research," yet the GG Draft EA proposes many controversial activities with no use of best available, or any, science.In the Vegetation section, we are suppose to feel good and informed with statements such as "it is expected" (emphasis added). And: "For greater detail on desired, existing, and expected post-treatment percent canopy cover class and acres of canopy cover class within the large tree size class within PVGs 5 to 8, refer to table 45 in appendix G." But Appendix G provides only numbers (not always consistently) and no greater detail.It appears the effects analyses for Vegetation and Fuels (pp. 32-38) focused on the benefits of treating the most acres identified. Although, a reader must seek out Appendix G to find these numbers. It is burdensome and confusing to force the reader to refer to appendices for any specifics on the project. Likewise project design features are relegated to an appendix (Appendix C). There is no analysis of the effectiveness of these design features and the wording makes some of them discretionary.The Fuels analysis (p. 35) appears to only consider the benefits of prescribed fire and thinning, and not timber harvest, on the proposed 36,000 acres. It is unclear then, how harvest contributes to the fuel reduction goals. The EA states: "modeling methods were used to assess the impacts of prescribed fire and thinning treatments on wildfire flame length, rate of spread, and crown fire activity." Without any analysis of the effects of treating fewer acres than intended (i.e., another alternative), it is unclear how flame lengths would change or how well the treatments will actually do what is intended. Despite the potentially high risk of much of the forests in the project area to wildfire, the project proposes up to 36,000 acres of prescribed fire (p. 14) with 500-10,000 acres "treated" annually. It takes some math to determine that forest vegetation covers only 26,000 acres in the project area. Does the PNF propose to burn 10,000 acres of grass and scrublands without any consideration or disclosure of the risk of spread of noxious and invasive species? Also not clearly disclosed is the amount of NFS lands in the project area (33,000 acres of the entire 39,000 acre project area) or how the vagaries of working on state and private lands could change the effects analyses.The EA (p. 3) states "Infestation by balsam woolly adelgid, a non-native insect, has greatly impacted the subalpine fir and grand fir, the primary host species for balsam woolly adelgid. Balsam woolly adelgid has resulted in stand level mortality of both over- and understory fir[hellip]" The EA then argues that forest stands are too heavily composed of subalpine fir and grand fir, so they should be "treated." But since these species have been heavily impacted (i.e, killed?), it appears many treatments would be salvage logging. Although the document fails to clearly display that.But of far greater concern, is the lack of support for management of balsam woolly adelgid in natural ecosystems. In fact, the only cases where management might be effective seems to be in tree farms or other highly managed environments.A USFS guide for management of balsam woolly adelgid states the following: "Infestations appear to be permanent (so long as host trees remain), because it takes only one surviving individual to maintain or start a colony." This guide notes: "A stand severity rating developed by Hrinkevich et al. (2016) for subalpine fir and grand fir may be useful for assessing stand level-impacts of balsam woolly adelgid and the likelihood of adverse effects." Have stand severity ratings been completed? Even if they have, the guide says: "Currently there are no ways of

minimizing the long-term effects of balsam woolly adelgid upon native ecosystems." https://apps.fs.usda.gov/r6_decaid/views/ balsam_woolly_adelgid.htmlThe state of Montana also says: "In fact, no method to control the effects or manage the spread of this species at the stand or forest level currently exists. (https://fieldguide.mt.gov/speciesDetail.aspx?elcode=IIHOM21020)Utah State University Extension says: "Completely removing BWA from western ecosystems is not likely, as they are widespread and wind dispersed. Therefore, management focus primarily on prevention[hellip].Don't move firewood." https://issuu.com/usuextension/docs/invasive_pests_of_landscape_trees_in_utah/s/ 17692128In the Botany section we (finally) find recognition that "The proposed action, however, may also affect and is likely to adversely affect whitebark pine" (see previous comments on FWS consultation.) But someone can't count acres. The project proposes up to 36,000 acres (33,352 acres of NFS land) of prescribed fire treatments, but the botany section states: "Exposure to proposed treatments would occur on a maximum of approximately 4,492 acres, which represents 81 percent of the 5,517 acres of whitebark pine habitat within the Granite Goose project area." How did we get from a proposal to treat all NFS lands with prescribed fire to the assertion of a maximum treatment of whitebark pine on 4,492 acres?The wildlife section is inadequate, with no references or supporting information, except "More detailed information and analysis for each species is provided in the Terrestrial Wildlife Report in the project record." Without any links or access to this report there is no way for anyone (let alone a professional wildlife biologist) to understand the effects of the proposed actions. The USFS must provide analyses for how the project will change the amount of habitat for species of concern (i.e., MIS, Sensitive or Species of Conservation Concern, TES) in the project area, and cumulatively across the PNF. This is particularly important, because the PNF failed to complete a Wildlife Conservation Strategy that could be used to inform the analysis of effects of large-scale timber projects, such as proposed by the Granite Goose Project.The Project Would Impact Wolverines and Wolverine HabitatAs I mentioned previously, any activities that would increase winter recreation use and potential impacts to wolverines and wolverine habitat must be fully analyzed and disclosed, including Best Available Science (BAS) to support any decision. I am fully versed in the requirement to provide sufficient research to support NFS activities, for example, winter travel plans that would include areas of protection for wolverines. The GG Project Draft EA not only fails to disclose any research to support decisions on winter travel, it also fails to discuss the potential impacts to wolverine and other wildlife species from thousands of acres of vegetation treatments.The FWS recently made the important decision to list the North American wolverine in the contiguous U.S. as threatened (Federal Register Vol. 88, No. 229). This decision had too long been hampered by bias and misinterpretation of the research. The recent listing was based on a thorough updated research review, as documented in the 2023 Addendum to the Species Status Assessment (2023 ASSA). This updated review led to the correct determination that winter recreation could cause detrimental impacts to wolverine.The PNF was involved for many years in research on this topic. With the recent listing, it is important for National Forests, and specifically the PNF, to complete comprehensive winter travel management plans to adequately address this new information.As an essential and scientifically indisputable change from previous ESA determinations, this rule acknowledges that climate change (specifically loss of spring snowpack), is influencing the health and viability of the wolverine population in the contiguous U.S.The FWS is considering comments on exemptions for incidental take under the ESA, Section 4(d). I recently commented to the FWS that the proposed exemption for "forest management activities for the purposes of reducing the risk or severity of wildfire" may result in actions that continue to contribute to the decline of the species and continued listing under the ESA. The Granite-Goose Project is an example of these types of projects that may adversely affect the wolverine.I submitted many of the following comments to FWS, which I have modified for consideration by the PNF in relation to the Granite Goose Project EA.[bull] The FWS proposed exception to "take" for forest management is extremely general, and could include almost any forest management action that can ostensibly link to fuels reduction. Given current funding mechanisms focused on wildfire reduction, almost all forest management projects now include some version of "reducing wildfire risk" in the purpose and need description.[bull] Wolverines use a variety of habitats. The body of literature on wolverine habitat broadly associates wolverine with the transition zone above and below treeline in subalpine and alpine habitats, but research has found a notable use of forested habitats (Hornocker and Hash 1981, Copeland at. 2007.)[bull] The FWS stated "[hellip]most wolverine breeding habitat in the contiguous United States occurs at high elevations in rugged terrain that is not conducive to intensive forms of silviculture and timber harvest" (Fed. Reg. 83768-

83769) and "Forest management activities for the purposes of reducing the risk or severity of wildfire are generally not a threat to wolverines in the contiguous United States." To date, this has been the case for most fuel reduction treatments which have focused on lower-elevation dry pine forests.[bull] That is not the case with the Granite-Goose Project. which is a large-scale project in higher-elevation forests in occupied wolverine habitat. Because this project occurs in forest types that typically experience longer fire intervals under often stand-replacing conditions, it includes substantial thinning and removal of older-aged trees and, potentially, woody debris. It also proposes treatments are also driven by concerns about insect infestations. These treatments include regeneration prescriptions that would significantly reduce canopy cover and tree densities over thousands of acres.[bull] The argument that forest vegetation in wolverine habitat (to be clear - these are high elevation forests) "may burn catastrophically" only acknowledges how these forests have regenerated, in historic times. Some researchers argue that climate change is causing these fires to occur more frequently, but there are no data to show that "treating" these forests will reduce wildfire severity. At the same time, it is indisputable that if we log these forests we are removing important habitat not only for wolverine, but for many other listed (e.g., lynx) and USFS sensitive species (e.g., fisher, goshawk).[bull] Whether or not these type of treatments are ecologically necessary or will actually reduce wildfire risk, there is a potential impact to wolverine. Forest management (including clearcutting, selective harvest, understory thinning, and prescribed fire) removes habitat essential for wolverine denning and resting, and reduces habitat for wolverine prey and food caches.[bull] These treatments also open these areas to additional winter recreation - activities that the FWS acknowledged as impactive to wolverine survival. Opening forest stands provides easier access to snowmobiles and backcountry skiers, increasing opportunity for off-trail activity.[bull] Denning habitat has been a focus for wolverine conservation because wolverines have naturally low reproductive rates. Timber harvest and thinning reduce complex structure, affecting the quantity and quality of available denning habitat. This could also affect habitat used for other activities, such as resting, feeding, and food caching.[bull] Forest treatments typically include road construction for access. While some additional roads are temporary and subsequently removed, it could take several years for a project to be completed, leaving these roads open to travel and over-snow use in winter. Forest roads provide easier access for snowmobile use in winter, negatively impact wolverine distribution (88 Fed. Reg. 83,729: Heinemeyer et al. 2019, Evans Mack and Hagen 2022). This may exacerbate the negative effects of winter recreation on wolverine.[bull] The proposed exemption from take for forest management in wolverine habitat is not substantiated, as projects like the proposed Granite Goose Project exemplify. Hence, the FWS must remove this provision from the 4(d) rule or limit its extent to exclude elevations and locations where wolverines have been known to den. The appropriate mechanism to evaluate forest management activities, including those purported to reduce wildfire risk, is through Section 7 consultation, within which the FWS can offer recommendations or requirements to minimize impacts to wolverines.In summary, the Granite Goose Project Draft Environmental Assessment (EA) fails to support the purpose and need for the project; provides a totally inadequate analysis lacking in any reference to Best Available Science (BAS); and violates law, regulation, and policy.The document appears to have been prepared using the template of Condition Based Management Analyses. Such analyses do not meet the requirements of the NEPA.The EA fails to justify the large scale timber harvest and fuels treatments and fails to meet NEPA requirements for analysis and disclosure. In particular, the need for and effectiveness of the proposed treatments in higher elevation and/or moister forests, with historically longer fire return intervals, is not substantiated.Of great concern are the project effects to wolverines, recently listed as threatened under ESA. Any activities that would increase winter recreation use and potential impacts to wolverines and wolverine habitat must be fully analyzed and disclosed, including Best Available Science to support any decision. The Granite Goose Project could impact wolverines by 1) increasing recreation use through an expanded snowmobile parking lot, 2) building roads for timber harvest that subsequently provide additional winter recreation use (by snowmobilers and backcountry skiers), and 3) thinning and clearcutting forests, thereby allowing for expanded winter recreation use in wolverine habitat.The GG Project Draft EA not only fails to disclose any research to support decisions on winter travel, it also fails to discuss the potential impacts to wolverine and other wildlife species from thousands of acres of vegetation treatments.The proposed Bear Basin Winter Closure occurs outside of wolverine habitat and would not affect this species. This designation is long overdue and highly supported.References:Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?

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