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April 18, 2024

Forest Service, Shoshoni National Forest Wind River Ranger District

Attn: Tanner Shaler PO Box 186

Dubois, Wyoming 82513

RE: JOINT COMMENTS ON THE PROPOSED GREEN UNION PROJECT DRAFT ENVIRONMENTAL ASSESSMENT

Hello,

Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish, and the Center for Biological Diversity would like to submit the following comments on the draft Environmental Assessment (EA) for the proposed Green Union Project on the Wind River Ranger District of the Shoshoni National Forest. Please note that these joint comments include one attachment, #1. This attachment includes hard copies of various reports and/or publications that have been cited in these comments.

1. This project is a violation of the implementation of an Emergency Situation Determination (ESD) as per Public Law 117-58 of the Infrastructure Investment and Jobs Act.

Use of a ESD to implement this project is a violation of the Public Law 117-58 because the requirements for this law are not being met. First, the project has to occur within the Wildland Urban Interface (WUI). The WUI has been defined by the Healthy Forest Restoration Act (HRFA) as a community "at- risk" within a mile of the forest boundary. A community at-risk is defined by a "interface" or "intermix" density of people. An interface population has a population density of at least 250 people per square mile, while an intermix community has a population density of28-250 people per square mile, as described in the January 2001 Federal Register Notice. The Green Union draft EA did not provide a map of the WUI that encompasses the proposed treatments of9,683 acres within the 105,816 acre project area. Without demonstrating the proposed project occurs within a WUI as per the

HFRA, the agency has failed to meet the requirements to apply an ESD for this project.

Implementation of an ESD also requires that that no activities are planned within an Inventories Roadless Area. The proposed Green Union Project includes burning of 970 acres within an IRA. This is a violation of the ESD requirements.

Implementation of an ESD also requires the agency to adhere to all Land Management Plan direction. There are multiple violations of the 2015 Shoshoni Forest Plan direction in the proposed project. These violations address not only Forest Plan standards and guidelines, but the stated Desired Conditions and "Management Approach." Although not direct standards or guidelines, the latter are actions the agency has stated to the public that will direct management of these public lands. The following include Forest Plan violations that will be triggered by this project:

-No demonstrations were provided that the Forest Plan requirement of 10% old growth will be met in the Green Union Project Area.

-No demonstration was made to show that the minimum 30% elk security, areas of 250 or more acres, will be maintained in the project area.

-No demonstration was made to show that elk calving and mule deer fawning habitat will be protected from burning activities on 3,000 acres during the spring calving/fawning period from 5/15 to 6/30.

-No demonstration was made to show that goshawk nesting areas in the project area will be protected by a 0.25 mile buffer.

-The requirement to provide well-distributed habitat to sustain Management Indicator Species as the Brewer's Sparrow and the Ferruginous Hawk were not addressed, even though 3,000 acres of their habitat will be burned.

-Crucial winter range for moose will be destroyed on 6,540 acres of mature and old forest habitats.

-Crucial winter range for elk and mule deer will be destroyed on 3,000 acres of sagebrush burning.

-No demonstration was provided to show that the requirement for ongoing mapping of Region 4 sensitive species habitat (goshawks, boreal owls, pine marten) has occurred in the project area.

-The desired condition to have healthy cone-bearing stands of whitebark pine to provide habitat for the Clark's Nutcracker will not be met with the logging of whitebark pine stands.

-There was no demonstration that the 1998 baseline condition for grizzly bear security within the Warms Springs Bear Analysis Unit will be maintained.

-There was no demonstration that a stated Forest Plan management approach to improve migration corridors of at least 30% security will be met in the mule deer migration corridor.

-The stated Forest coordination with the state of Wyoming as per the Wyoming Mule Deer Initiative, the Strategic Habitat Plan, and the State Wildlife Action Plan for management of wildlife within the Green Union Project Area was never identified.

2. The Forest Service is violating the National Environmental Policy Act (NEPA), as well as Public Law 117-58 and application of an ESD, by failing to provide "high quality" and accurate information on project design and expected impacts to wildlife and whitebark pine so that the public can understand how the project will be implemented and what expected impacts are to wildlife resources.

The proposed project includes treatments on almost 10,000 acres of wildlife habitat within the Green Union project area of 105,816 acres. However, the on[shy] the-ground implementation of this project, other than treatment units, was essentially non-existent. As well, expected impacts to wildlife resources had almost no specific information. The most serious NEPA violation was the false claim that logging whitebark pine forests will "restore" and promote viability for this threatened species. The following are examples of these NEPA failures:

-There was no map of the WUI, as noted previously.

-There was no map of old growth forests in the project area.

-There was no summary of current and planned acres of old growth forests in the project area.

-There was no map of whitebark pine stands, including those already logged and those planned for logging.

-There was no map of goshawk nesting areas to be protected by Forest Plan direction.

-There was no map of occupied habitat for the Brewer's Sparrow and Ferruginous Hawk, Region 4 sensitive species.

-There was no map of mule deer and elk fawning and calving areas, areas that require protection from burning in the spring.

-There was no map of the Sheridan Pass IRA where burning is planned on 970acres.

-There was no map of roads to be used for the project, or for the 43 miles of new roads planned for the project.

-There was no map of current and proposed elk security in the project area.

-There was no analysis of the expected reduced population level and carrying capacity of grizzly bears in the Warm Springs BMA due to the increased mortality that will result from a huge increase in active motorized routes and habituation of bears to humans, and reduced nutritional potentials due to displacement of bears from activities planned on almost 10,000 acres of this BAU.

-There was no analysis of how logging of whitebark pine forests will eliminate availability of whitebark pine cones to grizzly bears due to the loss of red squirrels.

-The agency provided false claims that logging mature whitebark pine stands will ensure long-term persistence in the project area, which is contrary to the current best science.

-The agency did not support claims of restoring white bark pine via logging with any monitoring data from all the previous logging "restoration" activities that have occurred in whitebark pine stands in this project area.

-There was no analysis as to what the expected average annual increase in summer temperatures will be in the project area on wildlife due to forest thinning/burning, and how this will impact carrying capacity of wildlife as a result.

-There was no analysis of how destruction of 6,540 acres of crucial moose winter range due to logging will impact local moose populations.

-There was no analysis as to how destruction of 6,540 acres of crucial moose winter range with logging will impact winter/spring food resources for the threatened wolverine.

-There was no analysis of how logging 6,540 acres of forest will impact the Management Indicator Species the Red-breasted Nuthatch, and the roughly 24 bird species dependent upon snag forests for viability.

-Claims that the Forest Plan direction ensures habitat management for the Red-breasted Nuthatch and associated species is false.

-There was no summary of snag habitat conditions within all past harvest units, for 7 different projects in the project area on 11,154 acres, to demonstrate effectiveness of the Forest Plan snag standard in this project area.

-There was no analysis of project and cumulative impacts on 67 species of western forest birds from past logging on 11,154 acres, and planned logging on another 6,540 acres, in the project area.

-The agency did not provide the public with any specific information as to why the Green Union Project Area has been identified as a wildfire crisis emergency, which requires the elimination of public involvement activities (objections) so that emergency actions can be implemented quickly; the conditions in this project area that are different and unique from other areas of the Shoshoni National Forest, and what exactly are these conditions, were never defined to the public, in violation of the NEPA; removal of public involvement opportunities requires the agency to provide "high quality" information to the public as to why this removal action is necessary to promote public lands management overall, and the conservation of threatened species, including the grizzly bear, Canada lynx, wolverine and whitebark pine; the expected death of threatened species from wildfire was never identified as a need for emergency action; the expected death to humans without emergency action was also not identified; given that the proposed emergency treatments will degrade threatened species habitat and populations, the agency failed to clarify specifically why these adverse impacts from emergency action will be compensated somehow with eventual benefits to threatened species.

-The agency is using speculative damage to wildlife habitat from fire, including for threatened species as the grizzly bear, Canada lynx, wolverine and whitebark pine, as a basis for removing habitat/populations of these threatened species; the agency assumes that the damage of habitat/populations from fire will occur, and that this damage will be less than damage from logging and burning; however, there was no actual analysis provided in the Green Union draft EA as to how the agency determined that severe fire is both likely and may occur soon in the project area, or that the impacts of fire on wildlife will be more severe than that being proposed for fire prevention (9,683 acres of treatment); this information is required for comparison of the no action and action alternative.

3. The Forest Service would violate the Endangered Species Act (ESA) and the NEPA by adversely impacting the recovery of the grizzly bear, Canada lynx, wolverine, and whitebark pine.

Section 7(a)(l) of the ESA requires the agency to implement valid conservation measures for threatened species, such as the grizzly bear, Canada lynx, wolverine and whitebark pine. However, the Green Union project will adversely impact all 4 of these threatened species. The rationale for these adverse impacts is to remove/degrade habitat for these species in the event that such may potentially burn at some time in the future. A direct loss of habitat for these 4 species is claimed to benefit these species because their habitat/populations may potentially be destroyed with fire. The potential for habitat/population loss from fire was not identified, nor compared to the actual planned habitat/population loss from the Green Union Project. Thus the rationale for destroying/degrading threatened species habitat is speculative, and a violation of the ESA and the NEPA. Actual comparisons of impacts on threatened species between the no action and proposed action need to be completed in the draft EA for the Green Union Project in order for the agency to demonstrate compliance with the ESA.

4. The following are brief summaries of information that was required to be presented to the public in the Green Union draft EA to meet the requirements of the NEPA and the ESA.

GrizzlyBears

The proposed project would occur in the Warm Springs Bear Analysis Unit (BAU). This BAU consists of 183 square miles, which is 117,120 acres. The Green Union project area is 105,816. Thus this project encompasses 90% of the Warm Springs BAU. The 1998 baseline condition for security was about 30% in 2012. What the current security level was not provided in the Green Union analysis. Management in BAUs does not actually require bear management as per the current best science. Thus these areas can be managed as "population sinks" for grizzly bears. The current best science calls for grizzly bear source habitat to have a mile of less of active motorized routes per section, 60% security areas in BMUs, and a minimum size of security areas of 2500 acres (Proctor et al. 2020; Proctor et al. 2023). Active motorized routes believed to impact grizzly bears have from 10-20 vehicle trips per day (Mace et al. 1996; Northrup et al. 2012). The agency did not provide information on any of these 3 habitat criteria for grizzly bears that measure habitat quality. The active motorized route density in grizzly bear habitat has been further defined by Bader and Sieracki (2022) by mortality levels for grizzly bears. Table 8 in this report defines survival rates and population growth rate by active motorized routes; zero routes have a 100%, positive growth rate; 1 mile per section of such routes has a 95% static growth rate; 1.2 miles per section has an 85" survival rate and negative growth rate; a 1.4 density of active motorized routes is projected to have a 75% survival rate with a rapid population decline. The agency did not provide the active motorized route density that currently exists, or is planned during the Green Union Project. This information is key to providing the public with valid information as to how this project will impact grizzly bears, as is required by both the NEPA and the ESA.

There was also no analysis as to the expected impacts of either open or total roads on grizzly bear habituation. As was noted in the 1983 Recovery Plan, the recommended level of active motorized routes in grizzly bear habitat is a mile per section. This document also noted that closed roads can be detrimental to grizzly bears by providing a false sense of security from humans. Although there are no requirements for total and open roads to be restricted in BAUs, this information is still required by the NEPA and the ESA to be provided to the public. The agency needs to define how proposed management in the Warm Springs BAU compares to recommended levels for population maintenance of grizzly bears, including open roads, total roads, and security habitat. If this BAU is to be managed as sink habitat for grizzly bears, the rationale for this determination also needs to be provided, as well as demonstration as to why this is consistent with the ESA's requirement to promote recovery of a threatened species.

Another project impact on grizzly bears that was not addressed in the Green Union draft EA is the loss of whitebark pine cones to grizzly bears due to logging whitebark pine stands to remove other conifer species. This will degrade and/or remove red squirrel habitat. Red squirrels are required to make whitebark pine cones available to grizzly bears. Thus logging whitebark pine stands is a direct removal of a key food resource for grizzly bears (Reinhart and Mattson 1990; Mattson and JonkeI 1990). Also, logging whitebark pine stands to increase growth of whitebark pine trees is likely to increase their susceptibility to pine beetles in the future, due to increased growth (Six et al. 2014; Six et al. 2021).

Overall the direct and long-term adverse impacts to grizzly bears from the Green Union Project are clearly substantial, impacts not disclosed by the agency. In addition, management of this BAU as sink habitat for grizzly bears is a violation of the ESA, where recovery is not being promoted.

Whitebark Pine

The Shoshoni Forest Plan includes management direction to clearcut whitebark pine, or implement seed tree, shelterwood, or group selection cuts in whitebark pine (page 73, Table 13). This is the proposal for the Green Union Project as well. There would be 2,749 acres of whitebark pine logging, which is 6.5% of the total 43,931 acres of whitebark pine in this project area. Past logging included 11,154 acres of whitebarkpine logging, so a total of the modeled whitebark pine acre will have been logged with the Green Union Project, or almost 32% of this population. As per the draft EA, the destruction of whitebark pine, which would include vast numbers of seedlings and sapling, would exceed over a million acres. This is clearly an adverse impact on whitebark pine, an impact that was not disclosed in the draft EA, in violation of the NEPA. This massive destruction of whitebark pine will also trigger a violation of the ESA, as recovery of whitebark pine is being hindered, instead of promoted.

The agency did not address the loss of genetic diversity that will result from the killing of thousands and thousands of whitebark pine seedlings, saplings, and young trees, as well as potentially mature trees that would be damaged from logging activities. The genetic diversity that is provided by these younger trees, that has accrued over hundreds of years, given that whitebark pine can live up to 1,000 years, will surely have severe population consequences for this tree in the Green Union project area. This severe impact was not disclosed by the agency, in violation of the NEPA. This impact would require completion of an Environmental Impact Statement (EIS), along with the severe impacts it will have on the grizzly bear and Clark's Nutcracker.

The draft EA also did not consider new science in that thinning whitebark pine stands to increase their growth will possibly increase their vulnerability to bark beetles in the future (Six et all. 2014; Six et al. 2021). As was noted in the Standing Analysis for whitebark pine (USDI 2023), succession of whitebark pine stands to subalpine fir may take 500 years or more. This analysis also noted that seedling and sapling whitebark pine may tolerate long periods of suppression in the understory, and still release, possibly sporadically, when canopy openings occur. As such, these understory whitebark pine are essential to the long-term viability of whitebark pine stands, even though the Green Union project objectives are to destroy these recruitment trees. The draft EA did not define how the loss of existing whitebark pine recruitment will be compensated with masses of new seedling/sapling trees, although this in itself would not address the loss of genetic diversity provided by hundreds of years of various-aged recruitment trees. However, suggestions that stand opening will increase whitebark pine regeneration has not yet been documemted (Keane and Parsons 2010).

The whitebark pine standing analysis also noted that whitebark pine is highly vulnerable to death from fire. Thus on top of the proposed logging of whitebark pine and trampling/slashing of the understory, surviving smaller whitebark pine trees will be killed with fire.

In conclusion, the Green Union project will clearly create severe adverse population impacts to whitebark pine,

impacts that were falsely defined as restoration, in violation of the NEPA. As well, this project is a violation of the ESA as recovery of whitebark pine is not being promoted. It is also unclear why this project would comply with the 4(d) rule released by the USFWS. This rule allows limited mortality of whitebark pine when other management objectives are more important. The claim by the Forest Service that there is an emergency to log whitebark pine to prevent a wildfire crisis was never supported with any analysis, including why the Green Union project area has unique features that make it an emergency fire hazard. Nor did the agency define what the probability is for whitebark pine stands to be destroyed by fire versus logging and loss of decades/hundreds of years of recruitment (analysis comparison of the no action and proposed action alternatives, which is required by the NEPA.

Wolverine

The draft EA did not provide a valid assessment of project impacts on the wolverine, in violation of the NEPA. First, moose crucial winter range will be destroyed, which will reduce winter forage resources for the wolverine (Scrafford and Boyce 2018). Moose are highly dependent upon climax, dense mature forests in the winter in the Greater Yellowstone Ecosystem (Tyers 2003). Logging moose winter range will remove both the key understory forage provided by subalpine fir, but increase both snow depths and crusting, to the detriment of moose. Increased snow depths will also hinder wolverine travel (Wright and Ernst 2004b). Logging of mature older forest will also reduce the availability of food caching sites for wolveri8ne (Wright and Ernst 2004a).

The agency did not address how the proposed activities and road activities, as well, will impact wolverine. Wolverine are known to be highly sensitive to both roads and human activities, including logging (Scrafford et al. 2018; Fisher et al. 2013; Stewart et al. 2016). Nor did the agency address how logging 6,540 acres of mature forest would impact habitat suitability for the wolverine due to temperature increases. This species is noted to be highly sensitive to heat stress (Parks 2009). Opening 6,540 acres of currently dense forests will result in an undefined average temperature increase for wolverine, including in early spring habitat when wolverine seek prey on big game winter ranges and elk/deer calving/fawning habitat.

Even though the agency did not address the severe impacts the Green Union project will have on the threatened wolverine, these adverse impacts are a violation of the ESA as recovery of the wolverine is not be promoted within this landscape. Also, the severe adverse impacts this project will have on a threatened species require completion of an EIS, as is also required for the grizzly bear.

Canada Lynx

The Green Union project area occurs in lynx critical habitat. The basis for management of this habitat is the Northern Rockies Lynx Management Direction, or Lynx Amendment. This amendment is based on outdated science, including Holbrook et al. 2017a, Holbrook et al. 2017b, Holbrook et al. 2018, Holbrook et al. 2019, and Kosterman et al. 2018. As just one example, the Lynx Analysis Units (LAUs) identified in the Green Union project area are 6-8 times the size of the average lynx home range of about 17,000 acres (Olson et al. 2021). Thus the agency's analysis, that impacts to the LAUs will be minimal, are false. Impacts could easily impact a lynx home range, including lynx core habitat which is key to productivity (Kosterman et al. 2018; Holbrook et al. 2019). The Lynx Amendment is a violation of the NEPA because it allows local impacts to be "washed out" by measuring these impacts at an inappropriate scale.

The Lynx Amendment also does not have any criteria for maintaining habitat connectivity. The Green Union Project will clearly violate the Lynx Amendment by creating a long, massive travel barrier for lynx across almost

all the entire 105,816 acre project area. Any vegetation treatments have been documented to create avoidance by lynx for a minimum of 10 years, but likely for even longer than 40 years in some instances (Holbrook et al. 2018). The barrier impact of the Green Union project on lynx and lynx critical habitat will be highly adverse, an impact not disclosed by the agency.

The agency also did not evaluate the impact of the project within what would be individual lynx home ranges of roughly 17,000 acres. The current best science notes that productive lynx habitat in home ranges consists of no more than 5% openings, and at least 50% mature forest habitat. Mature forest habitat is defined in Holbrook et al. (2018) as undisturbed, dense older forests with both a high overstory canopy (56%) and 1500 seedling/saplings in the understory. These conditions will not be met if the stands are logged, including clearcut, in the Green Union Project.

This project is a violation of the Forest Plan for maintaining connectivity of lynx habitat, and a violation of both the ESA and the NEPA for failing to use the current best science in management of lynx critical habitat, and promoting recovery of a listed species.

Old Growth Forests

The Shoshoni National Forest has one management indicator species, the Red[shy] breasted Nuthatch, as well as three sensitive species as per Region 4, that are associated with old growth (USDA 1990 by Warren; USDA 2018). These include the pine marten, Boreal Owl, and Northern Goshawk. Recommended levels of old growth for the goshawk are 20% (Reynolds et al. 1992). Recommendations for the Red-breasted Nuthatch, a forest bird, ranges from 20-25% (Montana Partners in Flight 2000). In the Northern Rocky Mountains, there are at least 30 species of forest birds that are associated with old growth, including the following:

Black-backed Woodpecker, Boreal Owl, Brown Creeper, Chestnut-backed Chickadee, Flammulated Owl, Golden-crowned Kinglet, Hairy Woodpecker, Hammond's Flycatcher, Hermit Thrush, Lewis's Woodpecker, Northern Goshawk, Pileated Woodpecker, Pine Grosbeak, Red-breasted Nuthatch, Swainson's Thrush, Three-toed Woodpecker, Townsend's Warbler, Varied Thrush, Varux's Swift, White-breasted Nuthatch, Winter Wren, Williamson's Sapsucker, Pygmy Nuthatch, and Great Gray Owl.

There was no analysis in the Green Union draft EA as to how old growth management is affected the population levels of these 30+ bird species. This analysis is especially critical at this time given the ongoing losses of North American landbirds (Rosenberg et al. 2019); this includes a decline of 64% of 67 species of western forest birds, and would include many of the 30+ species associated with old growth forests.

The agency also did not evaluate how old growth management is affecting 2 other Region 4 sensitive species, the Boreal Owl and pine marten. As noted previously, the Boreal Owl has been identified as associated with old growth forests (USDA 1990; USDA 2018). Also, the pine marten has been noted to be highly dependent upon old growth forests as winter habitat (Sherburne and Bissonette 1994; Buskirk et al. 1989). Thus, just as old growth habitat for gosahawks needs to be distributed approximately every 6000 acres, old growth for pine marten also needs to be distributed with their territories, which are generally only several thousand acres. within several thousand acres of their territory as winter habitat. Old growth for songbirds needs to be distributed within roughly every 10,000 acres (USDA 1990). The Green Union draft EA has no information to demonstrate old growth is distributed to meet these wildlife needs, including for Region 4 sensitive species and Shoshoni National Forest MIS.

Snag Habitat

The Shoshoni National Forest uses an outdate snag management strategy of leaving several snags per acre in harvest units. This strategy was identified as invalid may years ago by the U.S. Forest Service (Bull et al. 1997). Even before that publication, research on Black-backed and Three-toed Woodpeckers noted that these species require the retention of large blocks of old forests which also contain abundant snags (Goggans et al. 19899). There was no monitoring information provided for this project as to what the current snag levels are in past logging units. The Forest Plan monitoring has no information on how this snag direction has maintained dependent species. These include at least 24 species of forest birds, many of which are in decline:

American Kestrel, Barred Owl, Black-backed Woodpecker, Black-capped Chickadee, Boreal Owl, Brown Creeper, Chestnut-backed Chickadee, Downy Woodpecker, Flammulated Owl, Hairy Woodpecker, House Finch, House Sparrow, House Wren, Lewis's Woodpecker, Mountain Bluebird, Mountain Chickadee, Northern Flicker, Pygmy Nuthatch, Northern Pygmy-Owl, Red[shy] breasted Nuthatch, Red-naped Sapsucker, Northern Saw-whet Owl, Three[shy] toed Woodpecker, Tree Swallow, Violet-green Swallow, Vaux's Swift, Western Screech Owl, White-breasted Nuthatch, Great Gray Owl, and Williamson's Sapsucker.

The above species that occur in the Green Union project area may vary, but the majority of these species would likely be present. Currently, there was no analysis of these species for the Green Union Project, in violation of the NEPA. Analysis of the NEPA is not based on Forest Plan direction, but on actual science. The cumulative impacts on this large suite of birds in the Green Union project area due to past logging is likely quite significant, impacts that will be exacerbated by additional logging. These impacts require completion of an EIS.

Sagebrush-associated Wildlife

The agency did not evaluate how the burning of 3,000 acres of sagebrush will impact the Brewer's Sparrow and Ferruginous Hawk. Recommendations for the Brewer's Sparrow call for retaining large unfragmented blocks of sagebrush (Montana Partners in Fight 2000). Also, the Shoshoni Forest Plan directs for ongoing mapping of Brewer's Sparrow and Ferruginous Hawk habitat, which is stated to occur in the Green Union Project Area. The impacts of removing 3,000 acres of this habitat for these Region 4 sensitive species could eliminate such within the proposed burning areas, which likely contain most of the suitable habitat in those locales. The specific habitat management program that is being implemented for these 2 sensitive species needs to be defined to the public, so that the agency can demonstrate specifically how they are being managed in the Green Union Project Area. Claims that burns will occur "in a mosaic" have no meaning for management of either species.

The agency is also required to maintain and/or improve habitat for elk and mule deer on crucial winter range and in migration corridors, as per the Forest Plan. There was no information provided in the draft EA that defined by reducing sagebrush maintains or improves habitat for elk and mule deer. Sagebrush has been identified as important winter forage for both species (Wambolt 1998).

Elk Summer Habitat

Although the Shoshoni Forest Plan appears to have no specific requirements for managing elk summer habitat, the planned high open road density during project activities, along with existing open/administrative roads, may have significant displacement impacts to elk. An open road density of over 2 miles per section is stated to have significant displacement impacts to elk (Christensen et al. 1993). Roads with over 2-4 vehicle trips per 12 hours are noted to displace elk (USDA/MFWP 2013). The agency has violated the NEPA by failing to define project

roading impacts to elk, which the Forest Plan defines as a species of concern. The proposed action to build 43 miles of new roads needs to include an assessment as to how these new roads will affect elk habitat effectiveness in the summer, and whether these levels will remain above 50% as recommended for effective elk habitat.

Inventoried Roadless Lands (IRAs)

The agency proposed to burn 970 acres within the Sheridan Ridge IRA. The draft EA states that burning in IRAs is consistent with the Roadless Area Rule. However, the draft EA did not provide any analysis as to how this burning will impact 67 species of western forest birds. This is a violation of the NEPA, as the public is not being provided with the conclusions as to why burning in this IRA will "restore" wildlife populations that occur in these ecosystems. This analysis of impacts of burning on birds needs to be provided, including the number of birds that will be directly killed by burning activities and smoke toxicity, and how this will affect local bird populations and why benefits from these deaths will eventually occur.

Regards,

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For

Mike Garrity, Director, Alliance for the Wild Rockies

For

Steve Kelly, Director, Council on Wildlife and Fish

For

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