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Comments:

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April 23, 2025
Forest Service
District Ranger
3710 Fallon Street, Suite C
Bozeman, MT 59718
RE: SCOPING COMMENTS ON THE PROPOSED HYALITE COTTONWOOD HAZARDOUS FUELS REDUCTIOIN PROJECT
Hello,
Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish, and Center for Biological Diversity would like to submit the following scoping comments for the proposed Hyalite Cottonwood Hazardous Fuels Reduction Project. We have included a map of the Bozeman Municipal Watershed Project, and a summary of vegetation acres treated in that project, along with these comments.
1. Cumulative effects analysis of the Hyalite Cottonwood and Bozeman Municipal Watershed Project
As indicated the map we have included for the Bozeman Municipal Watershed Project, the Hyalite Cottonwood project is not only immediately adjacent to this previous project, but there is actually an overlap of the project areas. For

example, the Bozeman Municipal Watershed project had units logging units (#120, fuel break treatments, and a prescribed burn unit (#19) in section 31, just east of Langhor Campground. A portion of the proposed units for the Hyalite Cottonwood project are located as well in section 31. Actually, it appears that all the units from the Bozeman Municipal Watershed project in section 31 will be treated again, including prescribed burned. The question is at what landscape scale is fuels reduction sufficient to control wildfire hazards? Apparently the landscape scale for the combined Hyalite Cottonwood and Bozeman Municipal Watershed acreage is not considered adequate to protect the Bozeman landscape from fire. Please provide an analysis of the criteria being applied to design fuels treatments projects as per landscape impacts, which are severe for all other resources, including wildlife. What is the basis for determining that this large combined landscape requires massive fuels reduction efforts to effectively protect the Bozeman community from wildfire? Is there any limit to the size of a specific landscape that requires treatment to control wildfire impacts to humans? For example, the Bozeman Municipal Watershed project planned on fuels management activities on 4,675 acres. The Hyalite Cottonwood project proposes treatment on 5,496 acres. This. is a combined fuels treatment area of 10,171 acres within these 2 adjacent watersheds. For the affected landscape, these are fuels treatments on over 50% of the landscape. What is the limit of localized impacts for fuels management that can be implemented while still meeting the requirements of the Forest Plan, and for maintaining a diversity of wildlife? Please provide this information in your upcoming analysis.

2. Much of the roughly 8000 acres Hyalite Cottonwood project area will be burned; please provide an analysis of the expected number of larger Douglas-fir and spruce trees that will be killed in prescribed burning.

It is clear that many of the large trees retained in logging units are subsequently killed in the prescribed burning of units, due to heavy duff layers around these trees that burn for long periods of time and kill the tree's cambium. Please provide a summary of the current data on the Custer-Gallatin National Forest (CGNF) as to this cumulative impact on large tree mortality from combined

logging and prescribed burning. What is the actual expected number of larger trees to remain in treatment units as a result of prescribed burning mortality?

3. The scoping notice indicates this project will be implemented as an emergency action; please define specifically why this is an emergency, as is required by the National Environmental Policy Act (NEPA).

Simply telling the public this is a fire emergency action does not meet the requirements of the NEPA. Please define what specifics create this emergency. For example, what is the expected savings in human life this project will create? What is the estimated loss of property this project will prevent? What levels of loss of human life and property loss trigger a need for emergency action? Also, why hasn't the Bozeman Municipal Watershed significantly reduced the potential for loss of human life and property for the city of Bozeman?

4. The CGNF Revised Forest Plan has a variety goals and objectives for Desired Conditions (DCs) for vegetation; please define how the Hyalite Cottonwood project will meet these DCs, and why emergency fuels treatments and vegetation DCs are one and the same.

It does not seem likely that the CGFP goals and objectives for vegetation DCs are the same as would occur in emergency fuels treatment areas. How could these 2 different management purposes have the same DCs for vegetation? If not, then how do emergency fuels treatments implement the CGNF RFP? This plan does not identify any locales where the vegetation DCs will not be applied in order to do emergency fuels reduction actions. It remains unclear as to how emergency fuels treatments can be consistent with CGNF RFP goals and objectives for vegetation DCs. Please define specifically how the RFP vegetation DCs are being implemented in the Hyalite Cottonwood project area. We note that emergency actions are still required to comply with Forest Plan direction.

5. Please define how CGNF RFP direction for old growth habitat will be met in the Hyalite Cottonwood project area.

The RFP notes that old growth forests will be maintained and/or increased, with specific levels identified for potential vegetation groups, such as cool moist, cold and warn dry and warm montane. Please define and map the current old growth in this project area, including for potential vegetation group, as per Green et al. (1991), including acres of each. If any of these old growth acres are planned for any types of treatments, the agency also needs to provide the documentation that these treatments will maintain habitat values for over 20 bird species associated with old growth forests. Also please provide a cumulative effects on old growth that includes the Bozeman Municipal Watershed project area. This analysis needs to include the goal of meeting Historical Range of Variation (HRV), which for old growth in the Northern Rockies, ranged from 20-50% of the landscape.

6. Please provide an inventory of the snag densities in the Hyalite Cottonwood

project area, noting as to whether the DCs for snags in the CGNF RFP are currently being met, and will be met after project implementation.

Given the heavily-logged conditions of this project area, it is unclear if the DCs for snags in the RFP are being met. Please provide a valid inventory of snag densities and sizes in the Hyalite Cottonwood project area. If RFP DCs are not being met, how can further losses be consistent with the RFP?

7. Please provide an analysis of project impacts on over 20 forest birds that depend upon snags as breeding/foraging habitat.

The DCs for snags in the RFP has no relevance to most wildlife species that require snags as nesting habitat, since these species require the entire breeding habitat

(e.g, thermal cover, hiding cover, foraging cover) not just a nesting cavity. There is no such analysis of the effects of logging and prescribed burning that kills large trees on forest birds in the RFP Final Environmental Impact Statement (FEIS). This FEIS also includes no analysis as to why numbers of snags left in harvest units provides a valid proxy for bird population levels. Overall, there is no means of measuring project impacts on these snag-associated wildlife species, in violation of both the NEPA and the National Forest Management Act (NFMA). The CFNF cannot legally continue with practices that destroy snag habitat for a variety of forest birds without completing a revision of the RFP that identifies this impact, and proposes valid measures to ensure long-term persistence of snag-associated wildlife.

Also, please estimate the loss of forage to various forest birds from the reduction of insect pests due to logging and fuels reduction. Pest reduction likely include bark beetles and wood boring larvae, as well as spruce budworm larvae. Activities that try to eliminate dead and diseased trees will at the same time remove important insect forage for various forest birds, such as woodpeckers, species that are essential to create nesting cavities for other forest birds. Thus management of insect pests is a key factor in sustaining populations of western forest birds. What is the strategy in the Hyalite Cottonwood project area for sustaining forage resources for woodpeckers?

8. Please provide an analysis of project and cumulative impacts of impacts to 20 or more bird species that rely on conifer seeds for persistence.

The effects of timber production and fuels reduction is to reduce the density of mature conifer trees that in turn create food resources for a large number of forest birds and other wildlife. Please provide an estimate of the reduction in the average and total number (by weight) of conifer seeds that will be lost with the proposed logging and burning. What level of a loss of conifer seed production is considered a significant adverse impacts on populations of western forest birds, and why will this project avoid that impact? Also, what is the estimated loss in

production of conifer seeds due to the adjacent Bozeman Municipal Watershed Project? That project individually will have created significant drops in populations of western forest birds due to a loss of forage.

9. The CGNF RFP fails to meet the requirements of the 2012 planning rule by including measures to sustain big game habitat on forest Service lands.

A map of the Hyalite Cottonwood project area indicates that there is currently a massive road density in this project area. Please define each of these roads as per length by numbers provided on the map, along with their current use. The scoping notice still claims that yet more roads will be required to implement this project. Given that elk habitat effectiveness requires no more than 2 miles of

active motorized routes per section in order to maintain a reasonable amount of elk use, it seems apparent that the Hyalite Cottonwood project area will far exceed this 50% HE level with project implementation, if it is not already exceeded. Please define the active motorized route density that will occur during this project, including as per recommendations of the Collaborative Recommendations of the USFW and MFWP (2013) for elk management, including on the Custer-Gallatin National Forest. If the 50% level will be exceeded, why would this project not have significant adverse impacts on elk?

Also, please define elk security for the Hyalite Cottonwood project area, as well as the adjacent Bozeman Municipal Watershed landscape. Please define it by the current best science, which requires that security include contiguous blocks of hiding cover. How can these combined areas, or even individually, provide 30% of the landscape as security?

Please also address the issue.of elk vulnerability as related to elk security. What is the current population level of elk in these 2 landscapes, as per Hunting District, and what do these levels indicate about elk vulnerability? If population levels exceed MFWP objectives, it would appear security on public lands is insufficient.

If existing security is impacting elk populations, why wouldn't this current project, as well as in combination with the Bozeman Municipal Watershed Project, exacerbate and existing problem that is significant?

10.Please define how the CGNA RFP can be met for maintaining connectivity of lynx habitat for the individual Hyalite Cottonwood project, and as well, in combination with the Bozeman Municipal Watershed Project; also please define the Wild land Urban Interface (WUI) as defined by Interface and Intermix communities, and how this overlaps with lynx habitat; also please use the current best science to evaluate project impacts on lynx, rather than the outdated Lynx Amendment.

The Northern Rockies Lynx Management Direction (hereafter "Lynx Amendment") requires that lynx habitat connectivity is maintained in areas where vegetation treatments occur. It seems highly unlikely that the Hyalite Cottonwood project can maintain habitat connectivity for lynx, given that almost all types of vegetation treatment areas are avoided by lynx for decades. Please map all suitable connectivity areas (mature and regeneration forest) in the project area, define the acreage these provide for connectivity, and define what the connectivity level will be after project implementation. And as noted above, please provide a valid analysis of the WUI to address exemptions and exceptions for lynx multistory and regeneration habitat. Finally, since the Lynx Amendment is based on science and recommendations for management of lynx that are 25 years old, this amendment cannot provide a valid assessment of project impacts on lynx. The CGNF RFP needs to be amended so that the current best science is being applied to lynx conservation.

11. Please evaluate project impacts on birds of conservation concern.

As per Table 37 in the Cooke City Fuels Reduction Project scoping letter, the following birds are either Montana Species of Concern (SOC) or U.S. Fish and

Wildlife Birds of Conservation Concern (BCC) for Bird Conservation Region 10 of the Northern Rockies:

Norther Goshawk, Black-backed Woodpecker, Broad-tailed Hummingbird, Brown Creeper, Calliope Hummingbird, Cassin's Finch, Evening Grosbeak, Golden Eagle, Great Gray Owl, Olive-sided Flycatcher, Rufous Hummingbird,

Varied Thrush, Veery, and Williamson's Sapsucker.
Please provide an analysis of project impacts on these species of conservation concern. Where is their habitat currently in the project area, and how much of this habitat will be impacted by the project? What will be the impact on the populations of these species of concern? How do these impacts indicate landscape impacts from the adjacent Bozeman Municipal Watershed Project?
12.How does this project comply with management of up to 70 species of western forest birds, 64% that are currently in decline?
It is unclear how the Hyalite Cottonwood project can provide habitat management for up to 70 species of western forest birds that depend upon public forests for viability. Given their documented ongoing declines since the mid-1970s, the agency needs to define how this project addresses maintaining these species. If declines are expected, what level of declines is considered an insignificant impact? What is the combined effect of this project and the adjacent Bozeman Municipal Watershed on these western forest birds? How can habitat management be implemented for this huge number of forest birds without any actual habitat objectives? The CGNF RFP never defines how the DCs for vegetation can provide habitat for these 70-plus bird species. How can this be done?
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13. How will the agency adhere to the Migratory Bird Treaty Act in this project?
Please estimate the number of neotropical migratory birds that will be killed by the various vegetation treatments. How is this mortality being addressed with the implementation of "beneficial practices" identified by the U.S. Fish and Wildlife Service to mitigate impacts so that incidental take of birds is allowed? What are these beneficial practices going to be, and what is their expected effectiveness in reducing/mitigating mortality to birds? How will smoke toxicity also be addressed for mortality to birds? Also, what BCCs have the USFWS identified as being present in this project area, which requires conservation measures?
14.Please define why reduction/elimination of stand replacement fire is an objective for this landscape for western forest birds.
There are many western forest birds that benefit from stand replacement fire. So it is not clear why this fuels reduction program targets reduction/elimination of this essential habitat for western forest birds. The benefits of stand replacement fire are even more essential in heavily-logged forests where natural snag habitat is extremely rare. Please define where in this overall landscape that stand replacement fire will be provided for as essential habitat for many western forest birds. How much of this landscape needs to provide stand replacement fire for these birds, and where will this be provided?
15.The CGNF RFP states that known raptor nesting/fledging areas will be protected from disturbances; are valid surveys going to be done, or is this just "window dressing?"
There are a considerable number of forest raptors that may be present in the Hyalite Cottonwood landscape, in what remains as suitable habitat from past
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logging. These include the Western Screech Owl, Great Gray Owl, Great Horned Owl, Northern Pygmy Owl, Northern Saw-whet Owl, Boreal Owl, Cooper's Hawk, Northern Goshawk, Red-tailed Hawk, Sharp-shinned Hawk, American Kestrel, Golden Eagle, and Peregrine Falcon. Have any surveys been done yet? What level of surveys were done, or will be done, including for forest owls which nest quite

early in the year. If no surveys are planned, how are the impacts to these species going to be measured? What type of cumulative impacts on these forest raptors occurred form the adjacent Bozeman Municipal Watershed Project? Overall, what is the expected loss of breeding activity of these forest raptors, and what measures define significant adverse impacts?

16.What are the CGNF RFP monitoring requirements for wildlife for this landscape?

We could not actually determine what wildlife species are being monitored by the RFP. What are the focal species, or new management indicator species? What type of monitoring of past activities is being used to evaluate wildlife impacts for this current project? Please provide the most recent monitoring reports for wildlife in the project record so the public has easy access to these.

17. Please define how the Hyalite Cottonwood project, along with the Bozeman Municipal Watershed Project, will cumulatively change the climate in this landscape to create adverse habitat conditions for almost all wildlife species, including the threatened wolverine.

Please evaluate how forest thinning will increase overall landscape temperatures for wildlife in these 2 project areas, and the extent to which population persistence of all these species will be reduced due to heat stress, increased exposure to severe weather events (strong winds, heavy precipitation or snows), a.nd reduced foraging opportunities, including those provided by pollinators. As one example, the wolverine Is noted to be sensitive to heat stress. Also, several forest owls are known to be sensitive to heat stress. How can these species be managed in a large fuels reduction program, which requires massive forest

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thinning and as such, significant temperature increases for the long term? Also, please define why increasing the potential of this landscape for increased fires due to treatments (e.g., drying out of vegetation in thinned areas, increase of wind speeds in thinned areas and along developed open roadways), why do these thinning activities reduce, instead of increase, the potential for severe wildfire?

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* BOZEMAN MUNICIPAL WATERSHED PROJECT

Alternative Six

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