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Comments: Jan. 7, 2026

Re: Proposed Granite-Moccasin Project

Dear Ranger Davies,

We appreciate this opportunity to provide public comments on the proposed Granite-Moccasin Project.

Please accept the following public comments on behalf of the Council on Wildlife and Fish, Alliance for the Wild Rockies, Native Ecosystems Council, and Friends of the Wild Swan.

Steve Kelly, Pres.

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January 7, 2026

Rob Davies, District Ranger

Hungry Horse Ranger District,

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Emergency? What Emergency?

There is no actual forest emergency? This description of the current condition - i.e., baseline condition - has not changed significantly in many decades and is pure computer-generated fiction (simulacra)!

NEPA Hard Look

The Flathead N.F. must take a "hard look" (NEPA) and accept meaningful public comments. This applies in this instance. A critical first step in the NEPA's "hard-look" process is to: "Determine the scope and the significant issues to be analyzed in depth in the environmental impact statement." See: [sect]1508.25.

By jumping immediately without any analysis whatsoever, this was not even considered.

A Forest Plan amendment is necessary when finding that a proposed Project, or significant portion of a site-specific project, is found to be "non-conforming" to the information, assumptions, analysis, standards, or guidelines, and/or non-disclosure of substantive, non-discretionary, Plan components and processes.

Scoping? What Scoping?

The Public Notice was too short and fails to meet the primary objectives of meaningful public participation before a decision is made.

Scoping is required for all Forest Service proposed (programmatic and site-specific) actions in an EA or an EIS.

The significance of the Project, as determined by the EA requires proper scoping notice, and sufficient time for public review and comment. Instead, we, the concerned public, are demeaned and insulted with an 'emergency' classification (which everyone knows on its face is totally bogus), in defiance of NEPA's plain statutory and regulatory language, and with no physical connection to any specific real emergency within the original Project area boundary.

Scoping is supposed to happen at the 'earliest possible time' in the NEPA process. Its purpose is to determine the scope of issues to be addressed in an EA or EIS and is meant to help a federal agency figure out what issues it will study in depth and what issues it can leave out of the EA or EIS.

Scoping explains to the public at large the proposed action and asks for input from the public and others about what issues it should study and which alternatives it should evaluate, well before issuance of a DN/FONSI. Often, the scoping process will include one or more public meetings. None of these bedrock NEPA elements were followed, just a surprise, "truncated" comment period. This is unprecedented, simply wrong, and unlawfully dismissive of the Purposes of the NEPA.

The scope of the Project will likely have significant individual and cumulative adverse impacts on the environment. Please analyze and consider alternatives and take a hard look at the multiple significant issues and direct, indirect and cumulative effects of the proposed Project. The impacts of these issues were simply not analyzed or disclosed as required when significant issues and impacts arise in NEPA analysis. We request an EIS for the Project.

Language

In the end, if all of legal fiction and language were to be destroyed,

we must realize that nothing in Nature, nothing in Reality, and

therefore no man would actually be harmed. The rabbit would

carry on in its ambiguous substance as if the word rabbit never

fictionally existed. And the Law of Nature would be untouched,

for Its True, self-Existence never required anything of man, no

names or titles, and certainly no language arts.

Clint Richardson, Strawman, p. 1140.

What does restore forest stands and enhance forest resiliency from their current condition towards desired conditions mean? Please disclose this term of art, their origin, definition, and meaning in the context of conforming to the Flathead Forest Plan and proposed Project, and the bogus Emergency classification.

The root word for "resilience" is the Latin word "redilire," which means to "rebound" or to "spring back." Spring back to what, from what, exactly? Additionally, it is derived from "resilientia," which also conveys the ability to recover quickly from difficulties.

There is nothing evident in the forest ecosystem's current form or function which could possibly trigger such radical vegetative "treatments." The forest is not currently in need of recovery. There is no difficulty from which to recover.

So, let me summarize: There is no emergency, no dis-ease, no event or series of

real events (stochastic or man-made) at this point in 3-dimensional time and space that truly exists. Not so? Show me!

All this meaningless verbiage is hype to rationalize/justify spending inordinate amounts of tax revenues on 100% made-up (fabricated) current conditions (ecological baseline). How do I know this?

Because there is not a shred of analysis or disclosure surrounding the global warming issue. Why is not drought, warming air, heating land, and water deliberately excluded from the familial relationship wildfire has to all these orphaned elements, working in harmony in Nature, in the ecosystem and simultaneously in the Project area today - and into the future ad infinitum.

Legalese is the king's language. To the legal societies and

Religious sects, illiteracy is merely a lack of juristic and scriptural knowledge, and this publicly imposed ignorance and trickery is the

tool of their general control over we, the common people. Thus, the

common or general language of the common people bounded and

burdened by public citizen-ship is viciously twisted and turned into

a language of fraud and deceit in direct opposition to Life, Law, God, and Nature Itself. This magical spell (the spelling and construction of words) therefore must first be realized as a state of despotic dualism[hellip] Ibid.

The proposed Project purports to restore forest stands, riparian habitat, lynx, wolverine and grizzly bear habitat and enhance forest and ecosystem resiliency from their current condition towards undefined, and undisclosed site-specific desired conditions as outlined in the Flathead Forest Plan.

These highlighted terms of art are not sufficiently defined to have real meaning to a lay commoner (average American citizen).

1) Resiliency is not defined in the Forest Plan - this term does not appear anywhere in the guiding programmatic document.

2) Restore appears numerous times in the Plan but offers no clue how these 'aspirational goals' will be implemented.

American democracy rests on two foundational assumptions:

1) First, that there is a clear and visible distinction between sham and reality, between the lies a demagogue would have us believe and the truths which are there all the time.

2) Second, that the people tend to prefer reality to sham, that if offered a choice between a simple truth and a contrived image, they will prefer the truth.

Neither of these any longer fits the facts. The Image, p. 36, Daniel Boorstin, [copy]1961.

Thus the pseudo-event makes the 'original' of any event impossible to trace, 'reshaping[hellip]our very concept of truth' (p. 205), in producing 'new categories of experience [hellip] no longer simply classifiable by the old common sense test of true-false (p. 211). Baudrillard and the Media, p. 55, William Merrin, [copy]2005.

So, IMHO, this is just another 'cookie-cutter,' model-generated (with no reference to anything original or Real), make-work government project masquerading as a problem in our public forests that needs 'fixing.'

(Habitat) Type Conversion

NFMA (the National Forest Management Act) was written to prevent the very type of "type conversion" being proposed. NFMA, Section 6(g)(3)(B) has three (3) complementary meanings in the context of programmatic timber planning:

1) [hellip]bring timber production into balance with wildlife and ecological values.

2) [hellip]limits 'forest conversions' only where conversion benefits non-timber resources.

3) [hellip] it prohibits monoculture.

When taken together these three policy principles require the Forest Service to take a hard look at the forest as an ecological whole and to ensure that the forest is not converted into a "tree farm," i.e. plantation.

Bingo! This proposed Project is precisely a classic example of what Congress was trying to prevent.

What is the clear intent if not a giant tree farm where a natural forest once stood. Wildfire risk, <1% chance, is no excuse for violating the intent and bedrock purposes of NFMA.

To deliberately shift species composition away from natural succession and native species, toward (allegedly, with no in depth study or peer-reviewed ecological scientific rationale) more grass for cows, and some mythical fire and drought-tolerant vegetative condition, free of insects and disease. The U.S. Senate in April, 1976, when NFMA was enacted, attempted to resolve the conflicts between multiple-use policy and "type conversions." This historical message is obviously either unknown, summarily disregarded, or scoffed at by the Forest Service in the 21st century.

(Pfister et al.) Old Growth Habitat Types/ 2012/2015 NFMA Planning Rule

The 2012/2015 Planning Rule requires that: Ecosystem diversity. The plan must include plan components, including standards or guidelines, to maintain or restore the diversity of ecosystems and habitat types throughout the plan area. In doing so, the plan must include plan components to maintain or restore;[hellip](ii) Rare[hellip]terrestrial[hellip] animal communities[hellip]" See also: 36 C.F.R. [sect]219.9 (a)(2). Emphasis added.

Generally, compliance with this 36 C.F.R. [sect]219.9[hellip]is intended to[hellip] support the persistence of most native species in the plan area. Old growth is the ecosystem upon which the rarest "terrestrial animal community" on the Forest is found.

Mandatory, non-discretionary growth forest standards in the 1982 (Regs) Forest Plans protected old growth associated/co-dependent wildlife species.

The 2009 Forest Plan seems to have removed any trace of these quantifiable standards, replaced them with nothing or a plethora of vague, meaningless narratives defined as "desired (future) condition" and a suite of "squishy" highly subjective (arbitrary), unenforceable guidelines that give priority to commercial values over all other multiple-use values. This new hierarchy of forest values is incredibly biased in favor of increasing clearcut logging, thinning and prescribed burning, or in other words, a radical expansion/inflation of "active management" for commerce, over against wildlife, water, wilderness and other non-commercial values.

How can we not be struck by the simultaneity of the annihilation of certain forests of the Greater Yellowstone ecosystem, and the clearcutting of the mental forest?

How can we help but conclude that the resulting rupture of the great ecological balance corresponds to a comparable rupture of the great balance of sensibility in which our thought continued to find sustenance? The Reality Overload, p. 10, Annie le Brun, [copy] 2000.

Within old growth stands, timber harvest or other vegetation management activities should not be authorized if the activities would likely modify the characteristics of the stand to the extent that the stand would no longer meet the definition of old growth (see glossary for old growth definition).

Nothing kills (murders) old growth forest faster than heavy machinery looking for sawlogs to liquidate into cash. Logging in old growth is totally unnecessary. Succession and natural disturbance perpetuate old growth, it seldom replicates the industrial exploitation that has reduced old growth to its present "rare" status. It is rare due to logging, not natural processes.

This Project is no exception. Management has never "provided" for an increase in old growth quantity or quality, it has consistently destroyed it. Emphasis Added.

Old growth is naturally resilient to impacts that might result in the loss of old growth characteristics, such as insect infestations, wildfire, and drought. And let us not forget loss associated with logging, thinning and prescribed burning.

Old growth contains dynamic components that contribute to high quality habitat, including large or very large live trees with rot or broken tops, snags, downed woody material, and a diversity of tree size classes and multi-layered canopies. Emphasis added. Old growth is not a thing, it is a series of interdependent relationships, of in other words, an ever-changing ecological process. Old growth is not static.

Each of these components which contribute to old-growth habitat must be analyzed for past, present and foreseeable future actions, and natural events. Each component must be subjected to a "hard look" (NEPA) of

habitat quality and quantity will continue to decline. Baseline conditions for very large live trees, rot, broken tops, snags, downed woody material and size and age classes and canopy condition are needed to properly assess and analyze the old-growth patch size, connectivity, and habitat capability now and in the foreseeable future (post-project).

Please list plant and animal species present in old growth in the Project area. Please map habitat areas and estimate population size, health and connectivity within individual stands, and between old growth stands.

All this is site-specific analysis is necessary because the forest-wide existing condition(s) (baseline) shown is the mean percent of old growth (See: Forest Plan glossary) with the 90 percent confidence interval shown in parenthesis. Source is Northern Region Summary Database, Forest Inventory and Analysis (FIA) data, updated in 2015. Can you see the problem? FIA data is one plot per >6,000 acres and is over 10 years old. This is in serious need of an upgrade - greater resolution and more recent data.

Old Growth Habitat/Wildlife: FS Goals, Objectives, Standards and Guidelines

Removing hazardous fuels within old growth stands is allowed if conducted in a manner that meets this requirement. This requirement does not apply to hazard tree removal and other public safety needs.

There are no meaningful forestwide old growth standards or guidelines.

There are no meaningful forestwide old growth habitat standards or guidelines.

Make up pseudo-events and terms of art as we do, I suppose.

Before this Project can proceed, and meet/'pass' NEPA "muster," a massive field survey effort must be conducted to evaluate all the characteristics of old growth, old-growth habitat and all the species co-dependent/associated with old growth stands of varying patch size, and varying security and connectivity. Migratory songbirds, pileated woodpecker, Northern Goshawk and Great Gray Owl, and pine marten would be a good place to start. A failure to gather viable data and conduct credible is a failure to follow NEPA procedures, which will undoubtedly result in significant adverse ecological and biological impacts to the human environment.

Maintaining diversity in old growth is about relationships, from underground to the tops of ancient trees, and elevation matters, and the air above and around. Logging fragments, breaks relationships and connectivity in old growth forests. Analyze and disclose the damage being proposed, NEPA requires this, at least.

We are in Rome, and so we must learn Rome's language or be helpless under its deception. This is the realm of legalese [mdash] the legal language [mdash] where fantasy and Reality collide to create the jurisdiction of legal law that so entraps all good men as one body politic under false names (nouns).

Strawman, pps. 55,56.

Wildland Urban Interface (WUI)

What is the baseline wildfire risk today? What is the Mean Risk to Structures, and what is the Mean Probability of Ignition? This is the 'baseline' risk.

What percentage of risk will be reduced (net change), and/or, "protected" (post-Project) from fire impacts in the wildland urban interface (WUI)? What will be the net reduction in risk if everything goes according to plan?

Please provide the WUI definition, and the source of that definition, being used, specific to this Project.

Please cite examples of where, in similar habitat types, a "coordinated risk management approach to promote landscapes that are resilient to fire-related disturbances and preparing for and executing a safe, effective, and efficient response to fire" has produced the results you are expecting in this Project area.

Please refer generally to:

Montana Wildfire Risk Assessment: Methods and Results; Prepared by:

Julie W. Gilbertson-Day, Kevin C. Vogler, Jim Napoli,

April Brough, Chris J. Moran, Joe H. Scott

Prepared for: Montana Department of Natural Resources and Conservation

Forestry Division; May 8, 2020

See also: A2.1 Mean Risk to Structures

The Mean Risk to Structures for counties and communities is displayed as a scatterplot of Mean Burn Probability versus Mean Conditional Risk to Structures (Figure A.2).

Commercial logging and roadbuilding on ultra-steep, north facing slopes does not reduce the threat of wildfires. What best available science supports the action alternatives?

The project fails to meet the stated Purpose and Need of the proposed Project.

This proposed Project is based on the usual scientific misrepresentations and omissions that often create "falsification of the scientific record" according to recent forest and wildfire studies funded and/or authored by the U.S. Forest Service. A falsified narrative is generally depicting a habitat type that doesn't exist in the Project area - deliberately misrepresenting historical facts on tree densities, low-severity fires, wildfire event intervals, all to "trick the public" into believing a false narrative to brainwash and/or gaslight the public into supporting current forest mismanagement and wildfire policies - all to generate maximum BUGDGET. As a quasi-military outfit, it is not surprising at all that the agency uses psy-op tactics to maximize agency budgets. But in the end, a lie is a lie.

Historical wildfire severity was mixed and naturally included a substantial component of high-severity, stand-replacing fire events, which creates essential snag forest habitat for diverse native wildlife species, and an essential component of old-growth forests conditions and old-growth habitat.

The 9th Circuit Court of Appeals has ruled that the Forest Service must follow the plan language of the WUI definition found in the Healthy Forest Restoration Act.

What is the expected effective duration of the proposed 'treatments'?

And, when do you expect re-treatment to be necessary? This is a 'foreseeable' action.

Does the WUI in the project area follow the plan language of the Healthy Forest Restoration Act?

The 9th Circuit Court of Appeals has ruled that the Forest Service must follow the plan language of the WUI found in the Healthy Forest Restoration Act.

Did the Flathead County Community Wildlife Protection Plan (2021) go through NEPA? If not, it must.

The revised forest Plan requires nothing less than utilization of Best Available Science. Moreover, NEPA requires more than aspirational statements, it requires accurate data, data analysis, and full public disclosure after taking a hard look.

As it stands, the Project is in violation of NEPA, NFMA and the APA.

Lynx Suffer From Arbitrary Expansion of WUI

The Forest Service (BA) and USFWS must accurately analyze the "environmental baseline," which includes the past and present impacts of all Federal, State, or private actions and other human activities in the action area.

Cumulative effects analysis must anticipate, and are defined as "those effects of future State or private activities, not involving Federal activities, that are reasonably certain to occur within the action area of the Federal action subject to consultation." 50 C.F.R. [sect]402.02.

All proposed Federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of State or private actions which are contemporaneous with the consultation in process must be considered.

The consequences to listed species or designated critical habitat from ongoing agency activities or existing agency facilities that are not within the agency's discretion to modify are part of the environmental baseline."

By illegally expanding the WUI, the FNF also illegally reduced ESA protections and fails to contribute to recovery for threatened lynx populations.

The Forest Service prioritized fuels reduction treatments over lynx recovery on significantly more acres than are authorized by the Revised Forest Plan.

Arbitrarily expanding the definition of the WUI exempts most of the Project area from Lynx Assessment conservation measures. This WUI definition is not supported by the plain language of the statute or case law.

It seems clear that the FNF has deliberately and improperly defined and mapped lynx habitat in the Project EA, without proper NEPA review.

Take a hard look at the Project's impacts to lynx and lynx Critical Habitat or suffer the consequences of violating NEPA, NFMA, the Revised Forest Plan, the ESA and the APA.

Back to Budget/Climate Change

Billions of dollars are being wasted based on perpetuating a false logging industry narrative. These are funds that could be used to prepare communities for more climate-driven wildfires using proven fire safety measures that harden homes and clear flammable vegetation immediately around structures.

We urge you to: 1) Protect forests from logging so they can absorb more carbon dioxide from the atmosphere and moderate fire behavior, and 2) harden homes using common sense measures to adapt to the present climate-driven wildfire era.

Please take a hard look at the effects of the project on climate change. Please take a hard look at how the project effect the carbon storage of the project area and how the project effects climate change. The federal district court of Montana recently

Roads/Grizzlies, elk, mule deer, moose and other displaced wildlife

Among the chief threats to grizzly bears and other wildlife species in the sights of legal hunters and illegal poachers are roads (past, present and foreseeable) that have already encroached in their once-secure habitat, plus proposed roads in future management actions that have priorities other than wildlife security.

Let me help the USFS-USDA remember, right here, right now, the purpose of the Endangered Species Act (ESA) is to [hellip]protect and recover imperiled species of fish, wildlife, and plants, and the ECOSYSTEMS UPON WHICH THEY DEPEND. It aims to prevent extinction and promote the recovery of species facing threats to their survival. The ESA also includes provisions for interagency cooperation to avoid harming listed species and their habitats. Emphasis added.

Roads and associated human use displace grizzly bears (and other 'shootable' wildlife) and increase grizzly mortality risk from poaching and conflicts with humans during the bears' non-denning season.

Displacement occurs because wildlife, especially grizzly bears form negative association[s] with roads (adverse conditioning) aris[ing] from the fear of vehicles, vehicle noise, and other human-related activities around roads, as well as from human scent along roads and hunting and shooting along or from roads.

As a result, grizzly bears (elk, moose, etc.) avoid roads, adjusting their habitat use patterns in part according to the density of open and closed roads in an area. Emphasis added. Crucially, a well-documented and longstanding body of scientific evidence demonstrates that this impact extends to low-use (even 'administrative-only use') and even closed roads.

Given the preponderance of evidence that roads displace, harm, kill and 'take' wildlife, especially grizzly bears, it is critically important to properly inventory all roads, map all roads, and analyze and disclose; 1) total miles/square mile of roads and trails, 2) same for open roads and trails, and 3) analyze the results in the context of the best available science as described above. In other words, calculate the loss of habitat effectiveness, estimate the displacement effect, describe the loss of connectivity within a project area, and looking at the loss of connectivity ecosystem-wide and between ecosystems.

Where "roads [are] closed to public travel, researchers have documented bear "avoidance of high total road densities areas."

The USFWS has acknowledged that grizzly bears learn quickly to avoid the disturbance generated by roads and may not choose to use these habitats even long after road closures. Once conditioned to avoid the disturbance and annoyance generated by roads, grizzlies may not change this resultant avoidance behavior for long periods after road closures and lack of negative reinforcement.

The impacts of high road density especially injure ("harm) female grizzly bears by significantly disrupting normal behavioral patterns, including breeding, feeding, and/or sheltering. In particular, high road density impairs female grizzly bears' "inherent reproductive potential" because displacement and disturbance impact(s) mean females may fail to breed at their potential frequency or they would fail to complete gestation due to decreased fitness.

Thus, according to seminal research by biologists Richard Mace and Timothy Manley in the Flathead Forest in the 1990s, "if unroaded habitats are reduced in quantity or size, the number of adult females will eventually decline," harming the grizzly bear population (Singular, Lower 48 population) as a whole.

Conclusion

This Project requires an EIS. Without significant changes in favor of wildlife and the quality of wildlife habitat, especially grizzly bears and other T & E species, the proposed Project violates the Forest Plan, violates NEPA, the ESA, violates the NFMA and its planning regulations, and the APA regarding old growth, wildfire risk assessment and analysis of the loss of biodiversity (NFMA) at both the programmatic and site-specific level.

Thank you for considering our issues and concerns.

Sincerely,

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Attachments:

int_gtr034 Pfister et al. (1977).pdf

Mace_and_Waller1997.pdf

Range_of_natural_variability_Applying_the_concept_.pdf

elk coordinatimgelkt1985lyon.pdf

Fire probability .00021%.docx

finney_quantitative_risk_analysis_wildlandfire_FEM_2005.pdf

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