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Comments: Please accept this objection on the Greenhorn Vegetation Management Project. Cottonwood has been involved in the collaborative component of this project since the beginning. We cannot support the project because it violates NEPA, NFMA, FACA, and MUSYA. Cottonwood incorporates all of its previous comments during the NEPA process by reference.

The project violates the Federal Advisory Committee Act. Cottonwood and Gallatin Wildlife Association sought to become members of the Gravelly Landscape Collaborative but were told we were not allowed to join because we file lawsuits and might not reach consensus. Exhibit 1.

The Greenhorn project violates NEPA. The Beaverhead Deerlodge needs to revise its Forest Plan to include management direction that addresses climate change. The project is invalid to the extent it relies on the Beaverhead Deerlodge Forest Plan, which does not contain management direction to address climate change. Forest management actions such as this cannot move forward unless, and until, the Forest Service has Plan direction to address climate change. The Custer Gallatin National Forest has acknowledged it needed to revise its Forest Plan to address impacts that are reasonably certain to occur because of climate change. Management direction comes at the Forest Plan level, not the site-specific level. Site-specific analysis only says what the impacts of the action are and how the project is going to meet the standards contained within the Forest Plan. The Forest Service needs standards in place for addressing climate change.

The site-specific analysis fails to address the fact that the Forest Plan is inadequate to address climate change. Cottonwood previously provided science that indicates logged forests may not grow back after logging because of climate change. E.g., Schoennagel, ADAPT TO MORE WILDFIRE IN WESTERN NORTH AMERICAN FORESTS AS CLIMATE CHANGES, Proceedings of the National Academy of Sciences (2017).

The Forest Service did not address at the Forest Plan level how it is going to satisfy the Multiple Use Sustained Yield Act if trees do not grow back.

The NEPA analysis does not seem to address the cumulative impacts of all logging projects such as this and how they exacerbate the climate change problem-from losing carbon stores to trees not growing back and not being able to sequester any more carbon, these are significant impacts that were not examined, and can only be examined at the Forest level. The level of allowable cumulative impacts is set at the Forest level, which again underscores why the Forest Plan needs to be revised and why the Forest Service cannot move forward with this project until the Plan is revised.

The Forest Service should prepare new NEPA analysis for the Allotment Management Plans that fall within the project area. The NEPA analysis does not discuss the cumulative impacts of logging, prescribed fire, and grazing. The NEPA analysis does not seem to discuss cattle grazing in the proposed action area. Is the prescribed fire to benefit the cattle? When will the cattle be allowed back into the project area? When was the AMP for the cattle grazing completed and when is the next round of NEPA scheduled for it?

Cottonwood and Gallatin went to most of the collaborative meetings and helped design the project to benefit bighorn sheep. The NEPA analysis does not seem to mention how the project would impact bighorn sheep or their habitat. NFMA regulations require well-connected populations and this project was originally supported by Cottonwood to help provide linkage corridors for bighorn sheep populations to connect and create a viable

population. There does not appear to be any analysis of how this project would impact bighorn sheep viability. The NEPA analysis does not seem to show where the proposed treatment units are located.

Please withdraw the Greenhorn Project.

/s/ John Meyer
JOHN MEYER