



To: Beaverhead Deerlodge National Forest
Re: Greenhorn Project
Date: August 8, 2022

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

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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



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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



EXHIBIT 1

From: Glenn Hockett [<mailto:glhockett@bresnan.net>]
Sent: Wednesday, May 09, 2018 4:53 PM
To: Future-West; Jennifer Boyer
Cc: Paul Griffin
Subject: FW: Gravelly Landscape Collaborative notes & events

Jennifer:

I just took a quick look at this and notice a couple of omissions. On page 4 I on behalf of GWA did express concerns about exploring options in the Tobacco Roots as expressed at the meeting. It says incorrectly all were in favor of this next step. This is one of the reasons I/we would like to participate on the Planning Committee. We have concerns about what is being proposed. Also I am not listed as expressing an interest in the Planning Committee. GWA would like a seat at that table.

I will need more time to review the rest of the document and I am leaving for Minnesota very early in the morning so I will not be able to get back to you until late next week. Please hold off on sending these notes out until the changes above are made and I have time to review these notes in more detail.

Paul (cced here) may also have some comments.

Thanks,

Glenn Hockett
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Working to Protect Habitat and Conserve Fish & Wildlife

On Jul 31, 2018, at 1:25 PM, Glenn Hockett <glhockett@bresnan.net> wrote:

Jennifer:

I just want to reiterate my interest in being a part of the Gravelly Landscape Planning Committee as I want to ensure GWA's interest are represented. The notes below indicate the Planning Committee was intending on meeting in May/June. I didn't get any notice. Has the Planning Committee been meeting without me? What is the resistance to my participation?

Thanks,

Glenn Hockett
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From: Jennifer Boyer <boyerfarm51@gmail.com>

Subject: Re: Gravelly Landscape Collaborative notes & events

Date: August 2, 2018 at 2:43:10 PM MDT

To: Glenn Hockett <glhockett@bresnan.net>

Cc: John Meyer <John@cottonwoodlaw.org>, Darcie Warden <dwarden@greateryellowstone.org>, Kris Inman <kinman@wcs.org>, KKSuzuki <kksukimt@gmail.com>, Dan Durham <ddurham@ranchresources.net>, John Anderson <jack@3rivers.net>

Dear Glenn,

We welcome the opportunity to clarify the GLC planning committee composition and process.

The PURPOSE of the planning committee is to explore previous and current opportunities to enhance watershed and forest function and resilience in the Tobacco Roots. The goals of potential management activities are consistent with those of the Greenhorn project and support forest health, fish and wildlife habitat and resiliency for climate change while maintaining diverse uses including recreation opportunities, timber harvest and grazing. These diverse goals and interests have been at the heart of the GLC since its inception.

The PROCESS of the planning committee is to hold a few meetings with resource specialists (USFS) to coordinate how best to present the current resources found in the landscape, start compiling challenges/concerns within the landscape and how can the information best be brought to the GLC as a whole for discussion. The planning committee is a small group representing diverse disciplines who are COMMITTED TO WORKING COLLABORATIVELY AND SEEKING CONSENSUS. This commitment is part of our charter. The Gallatin Wildlife Association and Cottonwood Law have not demonstrated a commitment to collaboration and the give and take required for consensus, as shown in the continued lawsuits and opposition to management actions that include grazing. For this reason GWA is not eligible to be invited as a planning committee member.

As the GLC explores opportunities for management that supports forest health, resiliency and the shared goals of the collaborative, public meetings will serve to advise and develop best approaches and locations. GLC public meetings are designed to offer opportunity for ALL public interests to participate and provide input, including of course GWA and Cottonwood. No decisions or actions will take place outside of these public forums, just as in the Greenhorn project development.

I hope this provides a clear explanation. Let me know if you have any unanswered questions.

We will be announcing a full GLC meeting in September (September 19 or 20 are target dates, to be confirmed) soon.

Thank you,

Jennifer Boyer

boyerfarm51@gmail.com

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