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Comments: I'm glad to see the Forest Plan amendment to EHE standards is being analyzed separately from the Mud Creek Timber Project. However, I have the following concerns:

1. That much of BNF does not meet Forest Plan EHE standards is no reason to relax those standards. That's like saying "we can't stop poaching, so let's just open the hunting season year round".

2. The reason given to amend the Forest Plan EHE standards appears to be driven by the desire to make it easier to build more logging roads. With over 3000 miles of them already, the last thing BNF needs is more logging roads.

3. Supporting evidence for the amendment is weak. FWP reports increasing elk numbers and increasing harvest numbers, but that doesn't mean that more protections wouldn't further increase these numbers. And that fact that "hiding and thermal cover are difficult to measure" does not mean that they should be disregarded. Perhaps elk do not need as much thermal cover as previously thought, but what about other wildlife? (see point 4 below).

4. You talk as though elk are the only species that matter, or that will be affected. But BNF Wildlife Biologist Dave Lockman has previously commented that EHE is used to protect habitat of many other species: "The EHE standard results in areas of secure habitat for a range of species including grizzly bears". (p. 10, Gold Butterfly Biological Assessment; p. 9 DLL 2 BA). In fact, EHE standards provide the only limits on road density in the forest. Roads detrimentally affect ALL wildlife. Therefore, the amendment's effect on other species also needs to be analyzed.

The proposed EHE Forest Plan amendment appears to be driven by a desire to more easily build new logging roads and to lessen the chances of litigation of logging projects. It is not supported by wildlife science, and needs to be analyzed in an EIS, for it will surely have a significant impact on wildlife and the quality of our public lands.

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