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Title:

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Dear Sirs and Madams:

I could not find any information about exactly what the BNSF proposes to do regarding elk habitat except for trying to reduce thermal cover by cutting more trees. My understanding is that you are saying that elk do not require the deep thermal cover that we once thought they needed except in extreme weather conditions.

My reading of the US Global Change Research Program's Our Changing Planet and The Fourth National Climate Assessment that was put out by 13 government agencies and departments including NASA, Department of Interior and Department of Agriculture indicates that extreme weather conditions will become much more common. We all know that elk can do well in hot conditions like Arkansas, yet we should also be aware that animals that have the ability to move to cooler areas suffer less stress. If we reduce the density of mature trees in an area of good thermal cover it is not likely to become good thermal cover again for many decades. Projections are that we will have a lot more heat extremes during this time period.

No logging should occur near recently burned areas as these areas generally have very limited thermal protection. Large-scale thinning projects render habitats virtually unusable to elk (Devoe, et al 2019). All logging projects should be small. This proposal to treat the whole Forest on the west side of the valley should be re-evaluated.

The federal reports mentioned above also indicate that fires will be more frequent in the coming decades. As demonstrated by the Roaring Lion fire, no amount of thinning can prevent homes from burning during an extreme weather event. With the certainty that fires will be more frequent in the future and the knowledge that the composition and structure of the homes built in the WUI is more important than thinning, let's not go overboard and thin the whole forest. We do not want a "raked" Forest. Of the habitable land on Earth, only 2% is left in a wild state. Our wildlands are the envy of the world and are where many of the Earth's remaining wildlife live. Only 3% of the animals on Earth are wild.

New Roads should not be built. Roads fracture ecosystems. We know so little about forest ecosystems. Yes, we know more than we did but there is so much more to learn. For example, forest managers used to remove all Alder trees because they had no commercial value. Now we know that the Alders are nitrogen fixers and are very important to forest health. Some forest managers are not even aware of this now.

Roads, old and new reduce elk habitat and security for all animals. Gated roads no longer offer much protection for animals as technology offers ease of access to these roads via high-tech mountain bikes, E bikes and who knows what else in the future. Mechanized travel on any closed roads should be prohibited. Currently many roads are closed during the rifle season but open during archery season. These roads should be closed during archery season as well due to the significant increase in bowhunting since 1987. Increased extreme weather events will make all roads much more likely to fail than they have been. Blowouts like what happened up Willow Creek will be more common. We cannot afford to maintain the roads we have.

Weeds are also a very big problem. I've never seen a logging project that does not introduce weeds. Sometimes the weeds are poisoned out, but that is at the expense of native plant communities and soil health. Spraying for weeds can be as bad or worse than the weeds themselves and spraying further fractures habitat by destroying root connectivity and mycorrhizal interactions etc. We should try to keep our footprint as small as possible.

As you know, it is difficult to comment on the forest plan amendments when one does not know what changes are proposed. I would suggest that BNSF come up with some specific changes and then have a discussion. What does BNFS want to change regarding Elk habitat objectives?

Thank you for taking the time to read my long letter. Please also take the time to read the federal publications: The US Global Change Research Program's Our Changing Planet and The Fourth National Climate Assessment. You may have them on hand in your office but if not, they can be easily obtained for free at the following website: <https://www.globalchange.gov/nca4>

Sincerely,

Andy Roubik