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Comments: I am writing to raise two fundamental issues associated with the South Plateau Landscape Area Treatment Project Draft Revised Environmental Assessment (Draft EA) and project concept itself.

While there are multiple other issues that I could address, the paucity of described Project detail precludes informed, detailed public analysis or comment. In addition, the cavalier decision to move forward with a Project that would "would add to overall mortality risk to (grizzly) bears across the Subunits (Bear Management Subunits)" is unacceptable and based on the wishful thinking that bears will just avoid disturbance in treatment areas. As such it is an impediment to the protection of a threatened species (*Ursus arctos horribilis*) under the Endangered Species Act, and represents a decision that could result in litigation.

First, to echo the concerns outlined in submitted comments made by the United States Environmental Protection Agency (EPA) NEPA Branch, the Project Draft Environmental Assessment lacks the project specificity necessary for members of the public to engage in informed comment. To quote from the EPA submitted comments:

"The Draft EA lacks site-specific information about existing conditions, analyses of impacts, and mitigation measures.....Given this, we were unable to evaluate the likelihood that significant effects will be avoided for the EA and FONSI. NEPA requires a "hard look" at potential environmental impacts of a proposed action and public disclosure of those impacts prior to implementation.

The Draft EA does not contain the actual locations of the timber sales and harvest units or where the temporary roads will be built and therefore it cannot disclose, analyze, or describe the localized impacts that can potentially occur. Individual treatment project design and impact assessment will occur post-FONSI, years after the public comment period on this Draft EA. This lack of site-specificity hampers informed decision-making as part of the NEPA process, and therefore meaningful public participation on the individual treatment projects, both important for understanding the potential for significant impact and determining mechanisms for avoiding them."

To be clear, it is not possible to confidently analyze or model landscape-scale impacts of a proposed action without detailed, specific knowledge of what the constituent actions entail and how they potentially spatially and temporally interact with one another. This includes earth surface and hydrologic processes, ecosystem disturbance, and adverse impacts to biological components, including flora and fauna. I say this as a researcher with a doctorate in earth system science.

Given the location of the proposed South Plateau Project area in an ecosystem of international significance (Greater Yellowstone) adjacent to the crown jewel of National Parks, and in an area of important ecological connectivity and one vital to the threatened Yellowstone grizzly bear population, it is imperative that at a minimum, an Environmental Impact Statement outlining the details of the proposed activities be prepared.

In fact, the EPA comments question the entire approach and rationale of the Draft Revised EA:

"It appears the Forest is implementing a programmatic (vs. site-specific) approach and analysis that would authorize multiple non-commercial thinning, commercial logging, and prescribed fire projects without requiring future, site-specific project NEPA analyses. Given the lack of site-specific information and analysis, and potential for significant water quality, air quality and ecological impacts, it is unclear how the EA and FONSI will ensure significant impacts will be avoided for this project. We recommend the Forest develop this as a programmatic NEPA document that commits to tiered, site-specific NEPA analyses that provides opportunities for public involvement and comment on individual treatment projects."

This raises the question that if the EPA cannot assess the potential for future significant impacts of this Project, then how can the general public be expected to be able to comment in an informed manner on this?

Second, the same inherent lack of project specificity makes meaningful assessment of the impact on grizzly bears a difficult if not impossible task. As the Interagency Grizzly Bear Study Team (2019) concludes, a "substantial" number of grizzly bears of all ages use the South Plateau area during all seasons, and that there is "frequent, consistent and long-term use of the area by grizzly bears of all cohorts".

Indeed, the Draft Revised EA acknowledges that the South Plateau Project will "cumulatively, add to overall mortality risk to bears (grizzly)" associated with road building and human activity, with additional negative impacts to denning, resting, hiding and foraging habitat during project phases. Nonetheless, the EA goes on to conclude that bears will be minimally affected and can always move elsewhere in their assigned Bear Management Subunits (BMS) to avoid any disturbance. This latter assertion is not assessable given that the EA contains no site-specific information useful in cumulative impacts assessment regarding the location or timing of proposed thinning and clear-cutting projects or road construction.

The South Plateau Project Draft Environmental Assessment fails to provide the knowledge necessary for informed public input regarding the potential for ecological and biological impacts in anything other than a nebulous and superficial manner. In addition, it introduces unnecessary and negatively impactful actions to both grizzly bears and grizzly bear habitat in an area of connectivity significance within the designated Yellowstone grizzly bear Recovery Zone. Both of these shortcomings should lead to this entire project being withdrawn.