

Data Submitted (UTC 11): 11/6/2022 4:07:39 AM

First name: Robyn

Last name: Lauster

Organization:

Title:

Comments: I understand this is a 15-year project, the first one released under the new forest plan with over 16,000 acres involved.

1) Up to 56.8 miles of "temporary" roads will be built. Where will these roads be built? What are the long-term results of building these roads, which will obviously not just disappear after the logging. It leaves the whole area vulnerable to more encroachment.

2) 5,551 acres of clearcuts -- have we learned nothing about how damaging clearcutting is?? Think about the possible erosion, the loss of habitat!

3) 6,951 acres of commercial "thinning" -- which I believe means the old growth is taken, leaving younger trees to struggle without nurse trees and changing the nature of the forest completely for its inhabitants.

4) "Will likely adversely affect" ruling for grizzly bear and lynx. It would be 15 years before forest will grow enough for snowshoe hare to return to feed lynx, or longer since there is no plan to replant. Plan is to clearcut the maximum allowed within a Lynx Analysis Unit - 4600 acres! I object on behalf of the lynx.

5) You acknowledge that clearcut lodgepole pine will take 90-100 years to fully grow back. Since forty years yields a 3-inch diameter tree in past drought-free conditions, this is an optimistic prediction for the known future of drought (you HAVE heard of climate change...?)

6) It will cost taxpayers at least \$3.2 million. And what do we get for this? Degraded areas no longer supportive of the natural inhabitants?

7) The analysis of carbon storage is very weak, merely assuming that carbon will be stored in wood products. However, up to 80% of carbon is lost when forests are turned to lumber. There will also be a lot of slashing, piling, mulching, burning etc., all of which release carbon. Go back to the drawing board and include these figures.

8) You say 51% of the area is Wildland Urban Interface (WUI). This is according to the 2020 Gallatin County Wildfire Protection Plan. That "Plan" lists most of Gallatin County as Wildland Urban Interface, which indicates that no analysis of true WUI boundaries was ever done. Forest personnel acknowledged that treatment within 1/2 mile of structures is important, but as we have seen here in Bozeman on the BMW logging project, logging occurs up to six miles away from town.

9) Of course we are to believe you are saving the forest from beetles, fire and mistletoe. By cutting it down? EA repeatedly assumes logging will reduce wildfire risk with nothing to back it up. Does the forest need to be saved from fire? The Yellowstone fires of 1988 showed us that the forest recovers, and that fire is inevitable.

Have you considered any of the emerging knowledge about how trees communicate and cooperate across landscapes? Are the impacts of 15 years of truck traffic on area roads addressed? Where will the logs go? 83 million board feet of lumber would likely come out of there - over 10,000 truck loads. This will cause some damage that should be considered in the analysis.

I personally believe that these trees are worth more to humanity, Montanans, and wildlife as they stand. I object to the plan in general and in many specific ways, as noted above.

Thank you for the opportunity to comment.