

Data Submitted (UTC 11): 4/2/2025 6:41:14 PM

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Organization: Conservation Congress

Title: Director

Comments: What about the needs of wildlife? More logging, fuels reduction, old growth removal. You can't build habitat and this project sorely misses the mark for the wildlife that call this area home.

1. Thinning 2,541 acres of forest will allow more sunlight and wind to reach the forest floor, drying out the vegetation and increasing the rate at which fire spreads, according to Firesafe Montana and other research documents.
2. While you don't intend to build any permanent new roads, you nonetheless propose to log and/or "reduce fuels" on 109 acres of Inventoried Roadless Area, 135 acres of streamside zones, and 12 acres of old growth forest. Standing and fallen wood, alive and dead, is critical to the function of forest ecosystems and the sequestration of carbon. It should not be removed under the guise of "fuels reduction." Thank you for not proposing fuels reduction in the exceptional hemlock forests of Krause Basin!
3. Many of the roads to be used for the proposed thinning and logging are closed to motor vehicles and yet are routinely trespassed by them. Thinning trees increases the ease with which motor vehicles detour around road closure devices and should not occur in those areas. Furthermore, while you state logging use of these closed roads would likely occur "during the grizzly bear winter denning season," you fail to use the shorter January 1 - February 15 denning dates determined by numerous grizzly bear experts and the U.S. District Court in Missoula.
4. Your proposed logging "would result in six new even age openings over 40 acres," the maximum recommended by the National Forest Management Act. This would create large zero-age areas devoid of trees, unacceptably reduce essential hiding cover for wildlife, and create big eyesores on this scenic backdrop to the Flathead Valley!
5. Your intention to use a Categorical Exclusion from the preparation of an Environmental Assessment means "this would be the only comment period for the project," even though your staff has yet to conduct "an analysis of potential environmental effects in the coming months." Moreover, you would not allow the public to formally Object to any portion of the project. Please instead prepare an EA, if not an Environmental Impact Statement, under normal procedures so the public can read and comment on the environmental effects that you find and try to reach some common ground where there are disagreements.