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Comments: I submit the following comment as part of the administrative record for the Granite Moccasin Project proposed by the USDA Forest Service, Flathead National Forest, Hungry Horse Ranger District. The agency's project summary indicates the purpose is to reduce fuels in areas where wildfire on National Forest System lands threatens communities and assets and to provide protection to communities and essential infrastructure, with an expected Environmental Assessment under emergency action authorities (2021 Infrastructure: Emergency Actions). (US Forest Service)

I am generally supportive of targeted hazard mitigation where wildfire risk to lives and infrastructure is demonstrably imminent. However, this area is not anywhere near meeting that criteria, bordered by wilderness, a wild and scenic river corridor and a national park. I strongly oppose broad commercial logging, road construction, and mechanized treatments in areas that are not immediately adjacent to the wildland-urban interface (WUI) or where past Forest Service analysis has already documented severe, ongoing environmental harm.

I also note the maps made available for public review, including a vicinity map of the Granite Moccasin Project and Project Area Map #1 (links included below). To participate meaningfully in this process, I request the Forest Service clearly annotate on these maps all proposed treatment units, all proposed road construction/reconstruction activities, and all existing routes identified for maintenance or expanded use. I further request that the agency explain, in its NEPA documentation, the selection rationale for each represented treatment area.

Map references (please include with the project record):

*Vicinity map of project area: <https://usfs-public.app.box.com/v/PinyonPublic/file/2089160951732>

*Project Map #1 (closest to West Glacier): <https://usfs-public.app.box.com/v/PinyonPublic/file/2089150725483>

For example:

1. Pinnacle Creek Watershed: Exclude Logging and Roads

The Forest Service's own documentation from past analysis demonstrates that existing roads in the Pinnacle Creek watershed increased sediment yield almost 12-fold, and that roads will continue to generate sediment indefinitely absent restoration to a pre-road condition. Timber harvest and new or reactivated roads will predictably exacerbate sedimentation and watershed degradation.

Requested action:

Exclude the Pinnacle Creek watershed from commercial timber harvest and from new road construction or reconstruction. Prioritize restoration of existing routes to reduce sediment delivery to streams.

2. Skyland Area: Instability and Off-Corridor Treatment Concerns

The Skyland area is far from the Highway 2 WUI corridor and proposed critical infrastructure protection. It also has a documented history of unstable soils, road slumps, and culvert failures that heighten the risk of chronic erosion and costly maintenance problems.

Requested action:

Remove the Skyland area from the scope of commercial logging and road construction, and limit treatments there to those that do not rely on road access or create new surface disruptions.

3. Wildfire Risk Claims Must Be Balanced with Fire Ecology Reality

While reducing the risk of trees striking power lines is a narrowly defined benefit, overarching claims that broad logging and thinning will reduce wildfire risk across tens of thousands of acres are not sufficiently supported without site-specific fire behavior modeling. Logging and thinning can create drier, windier stand conditions that elevate flammability and spread potential if not narrowly prescribed and justified.

Requested action:

Provide quantitative fire behavior modeling for each proposed treatment type and location, demonstrating how each treatment will measurably reduce, rather than potentially increase, wildfire spread and intensity.

4. Forest Plan Amendment Before Intensive Treatments in Recommended Wilderness and Roadless Areas

The agency promised a Forest Plan amendment in 2022 to clarify what activities are allowed in areas recommended for addition to the National Wilderness Preservation System. That amendment must be completed before planning mechanized, motorized, or road-dependent actions in or adjacent to these sensitive areas.

Requested action:

Delay mechanized or motorized prescriptions - including road construction/reconstruction, maintenance beyond existing routes, and heavy equipment use for prescribed burning or restoration - until after the Forest Plan amendment is finalized and publicly available.

5. Emergency Authority Is Discretionary: Prepare a Draft EIS and Provide a 90-Day Comment Period

Emergency authority under 2021 Infrastructure: Emergency Actions does not require the Forest Service to minimize environmental review or public involvement, particularly for a landscape-level project encompassing over 67,000 acres with multiple activities. Past regional EIS work shows significant watershed and road legacy issues that remain unresolved and merit full analysis rather than expedited treatment. (Flathead Beacon)

Requested action:

Prepare a full Draft Environmental Impact Statement (DEIS) with explicit evaluation of all direct, indirect, and cumulative effects of the proposed actions. Provide a 90-day public comment period on the DEIS before any decision is finalized.

I support focused actions where wildfire risk is concretely tied to imminent threats to life and critical infrastructure within the WUI, but I do not support extensive logging, road building, or mechanized work outside those parameters. The Forest Service's NEPA documentation must be robust, transparent, and grounded in empirical analysis rather than accelerated process alone.

FORMAL ADMINISTRATIVE OBJECTION

Granite Moccasin Project - Flathead National Forest

I. INTRODUCTION AND STANDING

I submit this formal administrative objection to the Granite Moccasin Project, including the Forest Service's reliance on emergency authority and its intent to analyze the project through an Environmental Assessment rather than an Environmental Impact Statement.

I have standing to object as a member of the public with demonstrated interests in the management of National Forest lands in Flathead County, Montana, including watershed protection, wildlife habitat, old-growth forests, roadless and recommended Wilderness areas, and the congressionally designated Middle Fork Flathead River corridor. This objection incorporates my prior written comments and is submitted to preserve all procedural and substantive issues for administrative and judicial review under NEPA and related statutes.

II. SUMMARY OF OBJECTIONS

The Granite Moccasin Project is legally deficient because it:

- 1 Improperly relies on emergency and Executive Order-based authorities to bypass full NEPA review;
- 2 Fails to prepare an Environmental Impact Statement despite clear significance;
- 3 Ignores documented, unresolved watershed damage from roads, particularly in the Pinnacle Creek watershed;
- 4 Proposes road-dependent logging in geologically unstable terrain (Skyland area);
- 5 Misrepresents wildfire risk reduction benefits of broad logging;
- 6 Advances scientifically unsupported claims that logging improves wildlife diversity;
- 7 Fails to analyze impacts to the Middle Fork Flathead Wild & Scenic River corridor;
- 8 Fails to identify, disclose, or protect old-growth forests; and
- 9 Omits reasonable, less-damaging alternatives.

Each deficiency independently violates NEPA. Collectively, they preclude lawful approval of the project as proposed.

III. SPECIFIC OBJECTIONS

A. Improper Use of Emergency and Executive Order Authorities

The Granite Moccasin Project is a large, planned, landscape-scale project (67,536 acres) involving commercial timber harvest, roads, fuels treatment, and restoration. These are routine forest management activities, not unforeseen emergencies. Executive Orders and emergency authorities do not supersede NEPA, NFMA, or the Wild & Scenic Rivers Act, nor do they authorize elimination of public participation or environmental disclosure.

Requested remedy: Withdraw reliance on emergency authority and comply fully with NEPA.

B. Failure to Prepare an Environmental Impact Statement

The project's scale, connected actions, effects on sensitive watersheds, proximity to Wilderness and Wild & Scenic River corridors, unresolved road impacts, and substantial scientific controversy require preparation of an Environmental Impact Statement under NEPA. An Environmental Assessment is legally inadequate.

C. Unresolved Road-Caused Watershed Damage (Pinnacle Creek)

A prior Forest Service EIS found that roads in the Pinnacle Creek watershed increased sediment yield nearly 12-fold and would continue to generate sediment indefinitely unless restored. The current proposal fails to resolve these impacts and instead contemplates additional road-facilitated activity.

Requested remedy: Exclude Pinnacle Creek from commercial logging and new or intensified road use and analyze road decommissioning and restoration alternatives.

D. Road-Dependent Logging in Unstable Terrain (Skyland Area)

The Skyland area has a documented history of unstable soils, road slumps, and culvert failures. Proposing road-dependent logging here presents foreseeable environmental harm that must be avoided.

Requested remedy: Remove Skyland from road-dependent treatments and analyze non-road alternatives.

E. Mischaracterization of Wildfire Risk Reduction

The project relies on generalized claims that logging and thinning reduce wildfire risk. Peer-reviewed science shows that broad logging can increase wind penetration, fuel drying, and fire spread outside narrow WUI contexts. The project lacks treatment-specific fire behavior modeling demonstrating net risk reduction.

F. Unsupported Claims of Improved Wildlife Diversity

Claims that logging improves wildlife diversity are scientifically unsupported. Logging and roads reduce habitat for old-forest and interior species and favor generalist and edge species, resulting in ecological simplification-not true biodiversity. Presenting this claim without disclosure of adverse impacts violates NEPA's hard-look requirement.

(See attached Science Appendix.)

G. Impacts to the Middle Fork Flathead Wild & Scenic River

The project area lies adjacent to and upstream of the Middle Fork Flathead River. NEPA and the Wild & Scenic Rivers Act require analysis of direct, indirect, and cumulative effects to Outstandingly Remarkable Values, including water quality, sediment, scenic integrity, and wilderness character. The project fails to provide this analysis.

H. Failure to Identify and Protect Old-Growth Forests

The Forest Service has not adequately identified, mapped, or disclosed old-growth and mature forest stands within the project area, nor analyzed impacts to those forests or avoidance alternatives. Authorizing commercial harvest without an old-growth inventory violates NEPA and undermines stated resilience and biodiversity goals.

I. Inadequate Alternatives Analysis

The project fails to analyze reasonable alternatives, including:

- *a corridor-only WUI protection alternative,
- *a road-reduction and watershed restoration alternative, and
- *a non-commercial fuels alternative.

IV. CONCLUSION AND REQUESTED RELIEF

For the reasons stated above, I respectfully request that the Forest Service:

- 1Withdraw reliance on emergency authority;
- 2Prepare a Draft Environmental Impact Statement;
- 3Analyze and protect the Middle Fork Flathead Wild & Scenic River corridor;
- 4Identify and avoid old-growth forests;
- 5Exclude Pinnacle Creek and unstable terrain from road-dependent actions; and
- 6Provide meaningful public participation before any decision is finalized.

SCIENCE APPENDIX (For Granite Moccasin Project administrative record)

A. LOGGING AND WILDFIRE BEHAVIOR

Scientific consensus:

- *Broad-scale logging does not reliably reduce wildfire severity.
- *Thinning and canopy removal often increase wind speed, solar exposure, and fuel drying.

Key findings:

- *Fire spread is most strongly influenced by weather, topography, and ignition, not tree density.
- *Post-logging slash and surface fuels can increase short-term fire intensity.

Representative peer-reviewed sources:

- *Rhodes & Baker (2008) - logging did not reduce fire severity under extreme conditions
- *Schoennagel et al. (2017) - fuel treatments effective only in limited WUI contexts
- *Zald & Dunn (2018) - thinning can increase fire spread potential outside narrow prescriptions

B. LOGGING AND WILDLIFE DIVERSITY

Critical distinction:

Species richness ? ecological diversity.

Logging often increases edge and generalist species while eliminating habitat for:

- *Old-forest specialists;
- *Interior forest birds;
- *Large mammals sensitive to roads and fragmentation.

Road impacts:

- *Roads are among the strongest predictors of wildlife displacement, mortality, and invasive species spread.
- *Road density often has greater ecological impact than harvest intensity.

Peer-reviewed findings:

- *Franklin & Lindenmayer (2009) - logging reduces structural complexity essential for biodiversity
- *Hansen et al. (2013) - roadless areas are critical for wildlife persistence
- *Fahrig (2003) - fragmentation drives population decline even when habitat remains

C. WHITEBARK PINE AND "RESTORATION" CLAIMS

- *Whitebark pine restoration can be beneficial only when carefully limited, non-roaded, and non-commercial.
- *Using restoration as justification for road construction or broad logging undermines ecological goals.

D. SUMMARY FOR THE RECORD

The scientific literature does not support claims that broad commercial logging:

*Improves wildlife diversity;

*Reliably reduces wildfire risk; or

*Enhances long-term ecosystem resilience when roads are involved.

NEPA requires these realities be disclosed-not obscured-before decision-making.