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Comments: ?I am writing to express my profound concerns regarding the scale, ecological impacts, and procedural mechanisms of the proposed Bear Palmer Forest Health and Biomass Project. While managing forest resilience is a valid goal, the current scoping document relies heavily on aggressive commercial extraction under the guise of restoration. This approach risks permanently degrading vital wildlife habitat and undermining the public trust.

?1. Failure to Conduct a Full Environmental Impact Statement (EIS)

?Given the massive scope of the commercial logging, the heavy reliance on clearcutting, the extensive overlap with Canada lynx critical habitat, and the high level of public controversy, this project clearly meets the threshold of "significantly affecting the quality of the human environment."

?Proceeding under a standard Environmental Assessment (EA) or a Categorical Exclusion is legally and ecologically insufficient. The Forest Service must prepare a full Environmental Impact Statement (EIS) to rigorously analyze the direct, indirect, and cumulative impacts of this project on water quality, soil compaction, wildlife corridors, and carbon sequestration.

?2. Excessive Scale of Commercial Logging and Clearcutting

?The proposal to conduct 2,126 acres of commercial logging, which includes a staggering 824 acres of clearcutting (clearcut with reserves), is entirely disproportionate to a legitimate "forest health" initiative. Clearcutting on this scale fundamentally alters forest structure, microclimates, and soil composition. It removes the very components that define a resilient, mature forest ecosystem.

?The Forest Service must disclose the scientific peer-reviewed justification for utilizing widespread clearcutting as a tool for ecological restoration in this specific project area. I urge the agency to substantially reduce the commercial logging footprint and eliminate large-scale clearcutting in favor of non-commercial thinning, prescribed fire, and targeted, small-diameter hazardous fuels reduction.

?3. Severe Impacts on Threatened Species and Critical Habitat

?The project area overlaps significantly with sensitive and protected wildlife habitat, most notably providing critical habitat for the Canada lynx. Approximately two-thirds of the project's analysis area consists of lynx habitat. The heavy machinery, canopy opening, and road-building associated with 2,126 acres of commercial timber harvest will directly degrade the dense multi-story conifer structures that lynx require for foraging, denning, and movement.

Furthermore, the extensive removal of large trees and snags threatens nesting and foraging grounds for snag-dependent forest owls and other avian species. Snags and coarse woody debris are not "fuel piles" to be liquidated; they are biological legacies vital to forest biodiversity. The Forest Service must implement strict, enforceable buffers around known nesting sites and mandate the retention of all large-diameter snags (≥ 15 inches DBH) unless they pose an immediate safety hazard.

?4. Misuse of the "Emergency Situation Determination" (ESD)

The decision to seek an Emergency Situation Determination (ESD) from the Chief of the Forest Service is highly

objectionable. By bypassing the standard pre-decisional administrative review process (the objection process), the agency severely limits meaningful public participation and administrative accountability.

?An "emergency" designation should be reserved for immediate, unforeseen threats to human life and critical infrastructure-not used as an administrative loophole to fast-track controversial, large-scale commercial logging projects. Rushing this process without an objection period strips the community and independent scientists of their right to hold the agency accountable.

?5. Cumulative Watershed and Soil Impacts

?The extensive extraction planned will inevitably require heavy machinery that compacts forest soils, reduces water infiltration, and accelerates erosion. This is particularly dangerous on steep slopes, where increased runoff can sediment local streams, degrading water quality and aquatic habitats. The EA must include a comprehensive cumulative impacts analysis that accounts for past, present, and reasonably foreseeable private and public land logging actions in the watershed.

?Conclusion

?The Bear Palmer project in its current form prioritizes commercial timber production over genuine ecological health. I urge the Forest Service to:

?Prepare a comprehensive Environmental Impact Statement (EIS).

?Withdraw the request for an Emergency Situation Determination and reinstate full administrative objection rights.

?Redesign the project to focus strictly on non-commercial fuels reduction, prioritizing the protection of Canada lynx habitat and snag-dependent species.

Thank you for considering these comments.