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First name: Kyle

Last name: Martin

Organization:

Title:

Comments: I oppose this action as proposed, and I ask the agency to weigh the specific harms below.

The Biological Opinion's own Species Status Assessment finding is that whitebark pine's rangewide resiliency is already 'greatly diminished' by various factors, yet the Opinion still concludes the proposed 20-year program will not jeopardize the species without ever explaining how much additional mortality a species in decline can absorb before the cumulative effect becomes jeopardy. The agency should be required to tie its no-jeopardy finding to an explicit resiliency threshold derived from the SSA rather than just saying the added mortality is small.

The entire limit that the no-jeopardy conclusion rests on (a 1.5 percent annual cap per Forest Service region) explicitly excludes activities on non-federal lands that the Forest Service admits it cannot track, even though those same non-federal acres (4.9 percent of modeled habitat, or 850,767 acres) are funded, authorized, or carried out by the Forest Service and are folded into the cumulative effects math elsewhere in the document. The agency should explain how an unenforceable cap on nearly 5 percent of the affected habitat can support a rangewide no-jeopardy finding, and should require the same FACTS-based tracking used on Forest Service lands.

The document repeatedly justifies thinning and fuel-break treatments as beneficial because they increase whitebark pine vigor and resin-duct defenses, but research is also cited that the agency accepts as valid showing that tree vigor does not predict beetle resistance in whitebark pine and that faster-growing, higher-vigor trees are preferentially selected by mountain pine beetle. The agency should reconcile these contradictory conclusions before relying on vigor-based benefits to offset the direct mortality caused by heavy equipment, thinning, and fuel breaks.

The consultation history shows the process began immediately after Executive Order 14225 directed 'Immediate Expansion of American Timber Production' and was compressed into roughly two months from draft assessment to initiation of formal consultation for a wide-sweeping action. The agency should disclose whether the compressed timeline driven by the Executive Order affected the depth of the effects analysis and should extend the review period to allow full independent evaluation.