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**RE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE STONEWALL VEGETATION PROJECT**

Hello,

Native Ecosystems Council (NEC) and the Alliance for the Wild Rockies (AWR) would like to provide the following comments regarding the draft environmental impact statement (DEIS) for the proposed Stonewall Vegetation Project.

**1. General Comments:**

This document is far too large for the very limited amount of analysis data that is actually present. **It is a violation of the National Environmental Policy Act (NEPA) by creating a massive document that is full of meaningless, undocumented assumptions.** This DEIS could have been 20% of the size and still provided the same amount of information that was in it. **The Forest Service has made public involvement on this project very difficult, and the size of the document will likely discourage many publics from commenting.**

**2. Aspen Management**

**The DEIS suggests that aspen will be enhanced with forest thinning because aspen is being limited by conifer invasion and a lack of fire. The current best science does not support the claim that a lack of fire is causing aspen decline.** Aspen and conifers instead cycle in abundance on suitable sites with aspen being more prominent after fires, and conifers being more prominent until the next fire cycle moves through. **In addition, the DEIS did not actually provide any monitoring data on the level of conifer encroachment in stands proposed for treatment. It is not clear how serious encroachment is at**

A-Lack of  
Fire

B-Conifer  
Encroachment

**this time per stand.** Across the west, the most severe problem for aspen is destruction of shoots by cattle grazing. This is likely the problem in the Stonewall Project Area as well. Yet **there was no information provided on the impact of livestock grazing, even though one purpose of the project is to improve aspen.** You can't fix a problem if it is not correctly defined. **The current literature on aspen also notes that any activities that increase sprouting need to be fenced so that new aspen trees are not destroyed by cows.** The treatment of aspen in the Stonewall Project is likely a death sentence for aspen, as they will be stimulated to regenerate and this regeneration will be destroyed. **Any aspen areas treated need to be fenced from livestock.**

C-Livestock  
Grazing

### **3. Forest Plan Amendment**

**The use of a Forest Plan amendment for wildlife standards 3 and 4(a) requires a separate environmental analysis with alternative development and analysis of cumulative effects of failure to meet these standards across the Helena National Forest. Only 5 of 27 EHUs meet 4(a) and 10 of 27 meet standard 3. Failure to look at the chronic violations of these wildlife standards across the Forest indicates the agency has failed to take a hard look at amending the Forest Plan for this project. In addition, amending these 2 wildlife standards for the Project is not consistent with the best available science, and the amendments will authorize a project that violates elk habitat effectiveness and elk security.**

A-Elk  
Security

**The analysis of Forest-wide effects of the chronic failures to meet Forest Plans standard 3 and 4(a) need to include an assessment of elk vulnerability, including the percentage of bull harvest that occurs in the first week of the hunting season.**

B-Elk  
Vulnerability

**Also, it is not clear how this proposed site-specific amendments relate to the agency's travel planning where this portion of the Forest is proposed for a programmatic amendment to 3 and 4a. For example, the proposed Forest Plan programmatic amendment for the Blackfoot travel planning area would not allow elk security to decrease below 30%, and not be reduced any lower if the 30% is not being met. It is not clear how the Stonewall Project will affect elk security, as the analysis in the DEIS is flawed. However, it appears that the Project would violate the proposed Forest Plan Amendment for the Blackfoot Travel Plan.**

C-Elk  
Security and  
Blackfoot  
Travel Plan

#### 4. Elk Analysis

- A-Analysis in Violation **The DEIS analysis of elk and project impacts was so flawed and lacking in analysis that it is a violation of the NEPA, the NFMA and the APA.**
- B-Analysis differs from Blackfoot Travel Plan **The agency implies that logging will increase forage, and that this is needed to increase the local elk populations because they are below recommended levels. Yet the Blackfoot Travel Planning DEIS claims that elk numbers have been steadily increasing, with the benchmark level of 6400 identified in the Plan being actually 13,075 elk. Elk are at or near the 2004 population objectives of the MFWP.**
- C-Bull Elk **There was no analysis of bull elk vulnerability for the Project Area. Is the first week bull elk harvest objective of less than 40% being met? What is the trend of branch antlered bulls in the population? How were these issues considered in the decision to amend 4(a) and 3 for the Project for the Beaver Creek and Keep Cool EHUs?**
- D-Elk Security **The analysis of project impacts on security seems flawed. How can a considerable number of currently closed roads (closed year long) that will be needed for the Project not reduce elk security? How can cover removal of 1,169 acres not affect elk security? The current best science defines elk security as blocks of contiguous forest cover. The agency needs to analyze elk security by the current best science.**
- The DEIS needs to map elk security areas before, during and after logging and burning.**
- E-Roads and Elk Habitat Effectiveness **The same problem exists for habitat effectiveness. The DEIS failed to define the miles of currently closed roads that will be used for the Project. It seems impossible that habitat effectiveness can remain unchanged during project implementation. Please define the mileage of all road categories that will be used, including year-long closures as defined in the Blackfoot Travel Plan DEIS.**
- Also please evaluate open road density during logging by the average size of an elk home range, so that direct effects of the Project can be identified to the public.**

F- Big Game Hiding Cover and Thermal Cover

The definition of hiding cover requires it to be at least 40 acres in size. It does not appear that this Forest Plan standard was applied to the Project.

The DEIS claims that all thermal cover has already been lost due to the pine beetle, so logging will not affect it. Where is the documentation for this? We believe that logging of any forest cover on big game winter ranges is a Forest Plan violation. Even if the stands do not currently provide thermal cover, they will regain thermal cover much more quickly that if these areas are logged.

The agency did not complete Forest Plan amendments for violating management area direction for T-1 and T-3 for 50% hiding cover and 25% thermal cover. Also, cover cannot be removed adjacent to past harvest units that still do not contain cover. Provided some level of cover between past and proposed units does not qualify as Forest Plan direction, as hiding cover much be at least 40 acres in size (T-3). The T-1 MA standard that logging must enhance winter range was never verified as well. What data and/or current science has documented increased elk numbers on treated winter range, including treatments that reduce thermal cover? How can violation of a Forest Plan standard (25% thermal cover) be considered habitat improvement for elk?

In regards to T-3 where hiding cover must exist in past harvest units prior to additional logging adjacent to the unit, the agency cannot use the definition of hiding cover (hides 90% of an elk at 200 feet), since you are already using the 40% canopy cover definition. You have to stay consistent with the definition that you pick for the analysis. Please define how old an old clearcut has to be to provide a 40% canopy cover. What height does the stand have to be before it is hiding cover? This is not defined in the Forest Plan definition, but is clearly important in regards to clearcuts and regeneration.

G-Mule Deer Habitat

The current best science has documented that the optimum mule deer habitat is older growth mid-elevation and low elevation forest. The Project will clearly degrade mule deer habitat. Since the mule deer is a Forest MIS, the cumulative effects of logging impacts on mule deer across the Forest need to be included in the analysis to address Forest-wide viability.

Mule deer do not use large security blocks like elk. Please discuss mule deer vulnerability as per current and projected levels after project implementation.

H-Burning Sagebrush

It is not clear why sagebrush will be burned, and why this isn't degradation of both elk and mule deer spring, calving/fawning, and winter habitat. Why would key habitat for 2 Forest MIS be destroyed with burning? Sagebrush has about 12% protein in the winter, while grass has about 3% protein. Burning sagebrush will not improve forage for deer or elk.

I-Big Game Winter Range

There was no monitoring or science provided to define why the treatments on big game winter range will improve habitat for elk and/or mule deer. Specifically, what forage plants will increase, why are these plants important to big game, and what science or monitoring shows that big game populations have increased as a result of these winter range treatments?

## 6. Treatment of Inventoried Roadless Lands

A-Roadless Rule

The Forest Service will violate the 2000 Roadless Area Conservation Rule by severely degrading inventoried roadless lands with slashing and prescribed burning. The impacted IRA is being used as a "jobs program" for the Forest Service, instead of being managed by natural processes. The

B-Burning-

violation of the Roadless Area Conservation Rule also triggers a NEPA violation because the agency is providing false claims as to why the IRA needs to be managed, including with burning and thus forest destruction. There are extensive burned areas adjacent to the Project Area as per the

C-lack of fire

Snow Talon fire. Why is it determined that there is a lack of natural fire on this landscape, in order to justify more burning, especially in the Bear-Marshall-Scapegoat-Swan (BMSS) IRA? The smaller alternative 3 would burn 3,565 acres!

D- vegetation composition

The proposed burning in the IRA is justified by claims that prescribed fire and tree slashing will promote ecological restoration of a mix of vegetation composition and structure. This has no meaning to the public, since the desired mix of vegetation structure and composition was never defined.

Also, what is wrong with the current mix of vegetation structure and composition that needs to be restored? This claim is clearly a NEPA violation, as the agency is provided vague, undefined rationales as to why IRAs need to be burned. The agency also claims that burning will reduce severe wildfire, will maintain scenic qualities, and will have long term

benefits to naturalness. It is not clear what these claims are based on. Why is spot slashing and extensive burning considered natural, while wild fires are not considered natural.

E - wildlife  
habitat

There will be a lot forest burned with the proposal. This includes 5-10 acres patches of burned forest in low burning areas (326 acres), 10-20 acres burned patches in mixed severity burning (36 acres), and 30-75 acre burned patches on 3,265 acres also with mixed severity burning (Alternative 3). The specific reason why these forests need to be burned to restore ecological restoration was never provided in the DEIS. This is a curious claim, as every species of wildlife evaluated in the DEIS will have habitat removed for the short or long term with burning. This includes the threatened lynx, sensitive fisher, MIS pine marten, goshawk, pileated woodpecker, and many songbirds. Please define why restoration in IRAs requires the removal of habitat for a host of vulnerable wildlife species. What science is this based on?

F - lynx  
habitat

In particular, the slashing/burning of IRAs will remove lynx habitat, both current and future habitat. The DEIS at vii notes that the current condition in these areas is moving towards Douglas-fir, subalpine fir and spruce, and away from early seral species as loegepole pine, ponderosa pine, aspen, and western larch, and at viii that lodgepole pine is becoming mixed species of alpine fir and spruce.. The recent research on lynx in the adjacent Seeley Lake area notes that lynx habitat contains a mix of species, but subalpine fir and spruce are key. So why would IRAs need to have lynx habitat removed to be restored?

G- fisher  
habitat

The sensitive fisher is also dependent upon older forest habitats with dense, complex understories. Older climax conditions with spruce and alpine fir will provide high quality habitat for the fisher, and the proposed burning will degrade fisher habitat. Natural processes are restoring fisher habitat from old fires, while prescribed burning will eliminate fisher habitat. Why isn't the fisher also considered in restoration needs?

There is a natural restoration of lynx and fisher habitat from natural succession in the IRA to be treated. Since this is the best action for restoration, why isn't it included in an action alternative?

H-core  
grizzly bear  
habitat

Core grizzly bear habitat will be burned in the project, including almost 2,000 acres. Grizzly bears will be displaced from this activity, which defeats