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October 12, 2023

Lolo National Forest
Christopher Gauger, Ninemile District Ranger
Martin Jacob, Westside Ninemile project lead
20325 Remount Road
Huson, MT 59846

RE: Westside Ninemile Wildfire Resiliency Project

Submitted via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64799>

Dear Mr. Gauger and Mr. Jacob:

Thank you for the opportunity to submit a comment on behalf of Footloose Montana and our thousands of supporters in Montana. Footloose Montana is a nonprofit organization dedicated to the protection of all wildlife, including predators, with a special focus on ending trapping on Montana's public lands.

We believe that there should be an Environmental Assessment (EA) prepared and that this proposed project should not be categorically excluded from environmental analysis under NEPA.

Having just submitted our comments on FWP's proposed recreation strategy for the Fish Creek area, which could potentially impact several forest carnivores such as grizzlies, who depend on this linkage zone when they travel through the Ninemile Divide to the Selway-Bitterroot Mountains, we are very concerned about the fact that the FS's scoping letter does not even mention any potential detrimental impacts on wild animals such as grizzlies, black bears, and wolves along with many other wild animal species.

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The proposed project area is significant in size (2,838 acres), is located within the Ninemile Demographic Connectivity Area for many wildlife species, and there is a likelihood of impacts on the habitat of these wild animal species. The proposed project involves clearcuts and “openings” of areas greater than 40 acres, which will occur on 544 acres, nearly a square mile. In addition, 892 acres in one area will be commercially thinned which will involve extensive clearing of ground cover leaving a few large diameter trees and very few small trees. Another 1,402 acres will be thinned and burned, reducing ground cover and shrubs even further.

This project will most certainly have significant long-term impacts to grizzly bear habitat security through its purposeful, extensive reductions of cover which will expose grizzly bears to higher mortality risk and/or displace them from productive habitats—this may constitute a violation of the Endangered Species Act.

Furthermore, your scoping letter states that the FS has already applied to the *Secretary of Agriculture for an Emergency Action Determination, per section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58)*. ” This may be convenient for the FS since this would prohibit scrutiny and likely challenges from the public but all actions within the Lolo Forest and Ninemile District should be seen as connected actions and analyzed as such under NEPA.

In closure, we question the proposed process and necessity for this planned project, particularly since there is no evidence of recent fire, windstorms or insects and disease attacks within the project area. Because it has the potential to detrimentally impact grizzly bear use and migration from the NCDE to the Bitterroot ecosystem, this project requires ESA and NEPA review.

Sincerely,

Anja Heister, PhD on behalf of the Footloose Montana Board