



February 12, 2021

Ronald E. Hecker, District Ranger
Custer Gallatin National Forest, Ashland Ranger District
P.O. Box 168
Ashland, MT 59003

Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=58396>

Re: South Otter Landscape Restoration and Resiliency Project

Dear Ranger Hecker:

Thank you for this opportunity to comment on the South Hecker project.

The Center for Biological Diversity is a non-profit environmental organization with more than 81,000 members, and 1.7 million members and online activists nationwide who value wilderness, biodiversity, old growth forests, and the threatened and endangered species which occur on America's spectacular public lands and waters. Center members and supporters use and enjoy the Custer-Gallatin National Forest for recreation, photography, nature study, and spiritual renewal.

Our comments at this preliminary stage focus on the scale and duration of the project. The scoping notice indicates that the proposed action will cover a huge area, 450+ square miles, and will result in decades logging, burning, and other activity on the Forest.

This project may include treatment of up to 293,000 acres of forested and non-forested areas with prescribed fire, approximately 22,660 acres of commercial thinning with regeneration patches and seed trees, and 4,655 acres of improvement cuts. Regeneration patches within commercial thinning areas would vary in size up to 40 acres but maintain an average of 20 acres.

Request for Comments (Jan. 13, 2021) at 7. "Project implementation would be ongoing and could span 10 to 20 years." *Id.* at 10.

The vast scale and duration of the project indicate that this project is likely to have significant environmental impacts. Impacts can be considered significant even if they are beneficial. We therefore request that the Forest Service consider preparing a full environmental impact statement.

Please place me on your mailing list to receive updates about this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'E B Zukoski', with a stylized flourish at the end.

Edward B. Zukoski, Senior Attorney
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