



November 15, 2022

Mary Erickson  
Forest Supervisor  
Custer Gallatin National Forest  
130 E. Babcock Ave.  
Bozeman, Montana 59771  
Delivered via email

Dear Ms. Erickson:

Montana Wildlife Federation (MWF), the state's oldest and largest organization of hunters and anglers respectfully submits the following **formal request** for consideration in addition to a preface to our formal comments on the **South Otter Restoration & Resiliency Project**.

MWF understands the public comment process for the **Draft EA South Otter Restoration & Resiliency project** has been set for 30-days ending November 26, 2022 but reserves the opportunity to submit more detailed comments within this time frame if this **formal request** is denied in a timely manner.

**This MWF request is for an additional, formal 30-day period for public comment after the initial November 26, 2022 deadline. We ask the U.S. Forest Service to consider the justifications that follow.**

MWF believes that the release of the draft plan during the fall hunting season, with a 30-day comment period, conflicts with the activities of a greatly impacted constituency – public land hunters, many of whom are in the field. MWF also believes the existing comment period does not allow enough time for adequate analysis by the hunting public particularly during the Thanksgiving holiday. MWF has heard from Montana sportsmen and sportswomen who have said that they have not had the time to analyze the documents because they are in the field, the documents are lengthy, and/or they deep into big game and bird hunting.

MWF also believes

1) the scoping for this project does not facilitate or meet the intent of NEPA. To our knowledge only one document was offered to the public, the January 13, 2021, *South Otter Public Scoping Notification letter*. Since that time, we and our members are not aware of any public meetings, discussions or any other form of communication about

this project until the letter dated October 26, 2022, announcing the initiation of this 30-day comment period.

2) As a proposal using the new CFR 218 subpart B, Provisions Specific to Project-Level Proposals Not Authorized Under Healthy Forest Restoration Act, where a large-scale project such as this 318,000-acre project is not subject to an EIS, we believe additional communication and public engagement, other than a project initiation letter is necessary and required. We note that other projects with less complexity, scope, scale and duration on the Custer Gallatin are afforded more appropriate public engagement than what is offered here and as such, are truly perplexed as to why public engagement has been limited to a project initiation letter and a conclusionary 30-day comment letter on this project.

3) The scope, scale and duration of this project is huge; 318,000 acres. Of that the project envisions 184,150 acres of prescribed burning, 26,350 acres of commercial harvest, 11,165 acres of noncommercial harvest and close to 40,000 acres of reforestation. The unfathomable, 588 miles of travel ways that are to be built, reconstructed, modified or upgraded requires more than a 30-day review. Further the "minor modification" the EA describes for route designations on 291 miles of trails open to motorized travel as designated in the Ashland Travel management Record of Decision, to roads, is in itself an action of profound and interconnected effects and requires more than a 30-day comment period.

4) With this level of activity on over half the total acreage of the Ashland District for a duration of upwards of 10 years, we are adamant that the public deserves a fair opportunity to understand and comment on this project. We are challenged by the idea that no or minimal effects will occur to critical hiding and thermal cover within the few islands of green stands that have survived repeated massive fires on the Ashland Ranger District and need additional time to understand these conclusions.

Thank you for considering our request for an additional 30-day public comment period and considering our concerns. We look forward to your response.

Respectfully,



Frank Szollosi  
Executive Director  
Montana Wildlife Federation  
(406)-417-9909

Cc: Affiliated organizations of Montana Wildlife Federation  
Native Ecosystems Council  
Center for Biological Diversity