

Jim Steitz
849 Glades Road #1203
Gatlinburg, TN 37738

October 26, 2022

RE: 'South Plateau Vegetation Management' Project

Mary Erickson, Supervisor
Custer Gallatin National Forest
P.O. Box 130
10 East Babcock Avenue
Bozeman, MT 59771

Dear Supervisor Erickson,

I urge you to withdraw the 'South Plateau' project, which epitomizes the malign timber habits of a previous generation of Forest Service timber sales. The project also brazenly defies the public commitment by the Biden Administration to spare remaining old-growth forest on public land.

The conifer forests to be clearcut are mostly mature stands, in **no need of 'treatment' or 'regeneration,'** but rather representing a climax forest type that is increasingly rare and precious, especially in conjunction with the Yellowstone National Park whose boundary defining the legally sacrosanct Park respects no actual decline in ecological value on the National Forest side. Moreover, semi-arid conifer forests are at risk of not even regenerating after logging disturbance due to the heating and drying climate of the northern Rockies. **The project would increase, rather than decrease, hazard of high-intensity fire, and would likely yield not a forest with 'increased resilience'** to insect infection, but no recognizable forest at all.

The Forest Service appears unmoved by the executive order from earlier this year that timber sales would avoid old-growth forests. The order appeared to recognize that which has become evident to scientifically and ethically literate people, that these forests left standing are precious beyond description. By contrast, the lumber and pulp into which they would be transmuted are cheap commodities that will serve people once, in a frivolous and easily replaceable manner, before permanent landfilling. Rather than acknowledge these needs, the **Forest Service has attempted to ret-con its old timber program into the marketable paradigm of 'forest health' or 'fire prevention,' notwithstanding an absence of empirically real connection between the two,** and the 'South Plateau' project appears to be the latest installment in this ~~series~~.

The Yellowstone ecoregion is the last stronghold of a pre-settlement assemblage of megafauna in contiguous America, and several of these are staring a bleak future as climate change desiccates their tree cover, vanishes their food sources, and forces them up elevations with a narrowing and finite apex. Meanwhile, human avarice gobbles and lacerates their homes for houses, roads, and hydrocarbons. For the Forest Service to pile onto this peril by carving out another 4,000 acres of wounds and creating 57 miles of sediment-bleeding, animal-blocking roads would defy your obligation to attend to the larger ecological and social context in which the Gallatin exists. **If the 'need for action' was first identified in the 1987 Forest Plan, as your notice asserts, that need has vanished** under a torrent of biodiversity collapse, climate crisis, and numbing national waste of wood and paper products.

Sincerely,



Jim Steitz

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