

Montanans for Gallatin Wilderness

205 North 24th Ave.

Bozeman, MT 59718

April 27, 2023

Reviewing Officer

Northern Regional Office

Attn: SPLAT

26 Fort Missoula Road

Missoula, MT 59804

Objections to the South Plateau Project Timber Sale

Montanans for Gallatin Wilderness is an informal but dedicated group of individuals who care deeply about the future of the Custer Gallatin National Forest. We have been working for the protection of wilderness and wildlife here since 1986. Some of us filed an appeal of the previous Gallatin Forest Plan. So we know our territory.

We filed 21 pages of comments with Amanda Williams on the 2022 proposal.

We (Montanans for Gallatin Wilderness) object to the whole premise of the South Plateau Project. Our national forests have been over logged and abused for far too long. Since 1986 we have worked with hundreds of people to oppose and scale back industrial logging on our national forests. Yet the roads and stumps keep proliferating. The latest buzzword is “resilient forests” as if all our tinkering somehow makes them healthier. It does just the opposite – we have created sickly, declining forests on our public lands.

The US Forest Service, including the Custer Gallatin National Forest and the Hebgen Lake Ranger District, seems to lack a basic empathy and insight into the overall web of life, the urgency of the climate and extinction crises, and the implications of human pressure on the environment. You don’t seem to grasp that young people see the climate and extinction/biodiversity crises as existential threats. Then you wonder why the federal government is unpopular.

It would be a miracle to read something from the US Forest Service acknowledging that “yes, we have over cut your national forests and put in way too many roads. We realize that the Earth’s biosphere is collapsing and that we need to change our ways and give the land and the wildlife a break.”

Instead we have yet another mega-boondoggle called SPLAT, or the South Plateau Project. 5500 acres of clearcuts! 56.8 miles of new roads! 15 years of industrial logging! Right next to Yellowstone and the Continental Divide! In critical habitat for grizzly bear, moose, lynx, wolverine, elk, whitebark pine, and pine martens! Headwaters of the Madison River! In a critical wildlife migration corridor! In mature forest that will take 100 years to grow back, if it grows back at all! In what should be a forest carbon storage reserve! All at a major loss to the taxpayer! \$3.2 million loss in fact. Unbelievable.

We object to you wasting our tax money clearcutting and roading some of our nation's finest public lands. This has got to STOP. All your jargon and rationale do not justify the resulting degradation of the land.

This entire absurd SPLAT project should be scrapped. You have prepared only a minimal analysis of a mega-project. Failure to reveal and analyze detailed plans violates the National Environmental Policy Act. This project deserves an Environmental Impact Statement. The National Environmental Policy Act (NEPA) clearly requires the preparation of an EIS for an action with significant impacts. The SPLAT project will directly impact over 16,000 acres; will extend for at least 15 years with no further environmental analysis; will require nearly 57 miles of new roads; will clearcut 5500 acres and thin over 9,000 acres; will take place in critical occupied habitat for the Threatened grizzly bear and will affect grizzly bear use of the area; will occur in an important biological corridor; will take place in critical habitat for the endangered Canada lynx; will impact summer range for elk and summer and winter range for moose; will impact human use of a popular public land recreation area; will involve complex and unknown risks associated with carbon sequestration and climate change; and will involve potentially much higher impacts from logging due to avoidance of winter logging in favor of summer logging to protect winter recreation and wintering wildlife.

The justifications for SPLAT are very suspect: To prevent a stand-replacing fire (which could not be stopped unless you clearcut everything) and stop the insects and disease. In other words, replace all natural processes with industrial logging. Mow down and sell off the public's timber under the guise of restoring forest health. Cut the trees down before they get native mistletoe or beetle infestations. Feed the timber industry that has just shut down one of the two sawmills within reach of reasonable transport distance.

Our comments were not taken seriously, nor anyone else that spoke out against the SPLAT project. Nothing changed between the proposal and draft decision notice. In fact apparently you think this project will have nearly zero impact.

I did not see any response to my concerns over the regional impacts of this project on roads, highway safety and roadkill. If you have driven the roads in this region, especially between Bozeman and Big Sky,

this is a serious concern. Dumping thousands of log trucks onto these crowded highways will lead to disaster.

All the logs are likely to go to Sun Mountain Lumber in Deer Lodge since RY Timber in Livingston just closed its mill. My concerns remain over the impacts of this endless line of log trucks. And now they will all be concentrated on one route.

You claim that this project adheres to President Biden's Executive Order 14072 "Strengthening the Nation's Forests, Communities and Local Economies". The Draft Decision cites ways you will protect old growth forest but not mature forest which is generally defined as 80 years old. Stakeholder input regarding the inventory of old growth and mature forest suggested 80 years old as a criteria for defining mature forests. That applies to much of the lodgepole pine that is slated to be clearcut – 9 square miles of it. You are in direct defiance of the President's Order.

You clearly do not take seriously the project's impacts on climate change. For most responses to public concern over climate change, you have a boilerplate answer – "The impacts of forest management on carbon sequestration and storage were quantitatively analyzed in the Land Management Plan Final EIS Volume 1 Section 3.8, which is incorporated via tiering into the Draft EA. Over the longer term, projects like this one that are consistent with the Plan are likely to increase carbon storage and reduce emissions, by reducing disturbance risk and storing carbon in wood products." This is pie in the sky projecting – we need answers to and mitigation for climate change NOW, not in some undefined future. And as I stated in my comments, only 15% of carbon from trees is stored in wood products, the rest is lost to the atmosphere during logging and processing and burning of slash or decomposition. Even more is lost when wood products are wasted and discarded during construction and remodeling.

In the Fire and Fuels Report (page 4) we find the statement "Adaptive strategies to mitigate climate change effects, as recommended in the CCVA, are to return fire regimes to natural conditions via prescribed burning and mechanical thinning where appropriate. Both activities are proposed in the South Plateau project. This statement is an oxymoron – you cannot return to natural conditions via human made processes.

We strongly object to the logging of 7,764 acres of "unroaded wilderness inventory areas" resulting in "temporary adverse effects to the wilderness attributes of Undeveloped Character and Opportunities for Solitude." On a planet swarming with over 8 billion humans, and more every second, every acre of unroaded wilderness is precious, whether "inventoried" or not.

We object to pushing forward a major logging project that carries a "may effect" ruling for Canada lynx. We object to the logging of 19% of the Lynx Analysis Unit snowshoe hare winter habitat in the South Plateau. We are to be assured that "over time, all the proposed treatment types will encourage the growth of understory vegetation that hare are dependent on..." This assumed that trees will grow back because you are not planning on planting any! It could be decades before suitable food has grown back in clearcuts. And yes you plan to clearcut the MAXIMUM ALLOWABLE ACRES – 4600 – in lynx habitat. This is playing with fire – let's see just how much the lynx can take. Or not, since in 20 or 30 years it won't be your problem.

We object to logging off large areas of wolverine habitat. With no more than 312 wolverines in the lower 48, wolverine do not need more stress and disruption of their habitat. Removing tree cover could lead to earlier snowmelt and diminish the value of the South Plateau as habitat for wolverines, which are a candidate species for listing under the Endangered Species Act.

We object to the lack of detail regarding your “design features” are that will assure temporary roads are effectively closed and rehabilitated. Such features are integral to the successful restoration of the area after logging to assure humans and all their impacts stay out. In flatter terrain like you find here it is easier to restore a road but harder to keep people from bypassing the gates or other barriers and using the new road that should not exist.

We support the closure and decommissioning of Road 478 and removal of 8.2 miles of road but submit that this alleged improvement in grizzly bear security will be offset by building 56.8 miles of “temporary” roads with no definitive plan for effective removal and closure of these new roads.

We object to logging of important migratory bird habitat. Migratory bird species dependent on old growth and snag-rich forest would suffer from the SPLAT project. Logging would take place in spring nesting season, possibly destroying nests and killing eggs and nestlings. Birds that do best in diverse older forest with fire and snag characteristics include Brown creeper, Clark’s nutcracker, Great Grey Owl, Williamson’s sapsucker, Olive-sided flycatcher, Pacific wren, Northern Goshawk, and Black-backed woodpecker.

We object to logging of important American Marten habitat. Martens thrive in undisturbed old growth forests with plenty of down woody debris. The SPLAT Project could pose a major problem for marten existing in the area. The increase in access that will occur due to all the new roads (which will be closed but could easily be used by trappers on foot) may increase trapping pressure on these spectacular animals. Logging will reduce down woody debris and upright trees that martens need leaving habitat devoid of those components that allow martens to thrive.

We also object to increased ease of access for other hunters and trappers which will increase disturbance and pressure on all kinds of wildlife in the South Plateau – moose, elk, wolves, black bear, grizzly bear, fox, coyote, bobcat, mountain lion, grouse, etc.

We object to your repeated assurance that endangered animals like lynx, wolverine, grizzly bear will simply move somewhere else while the logging and road building is underway – as if they have tons of secure habitat elsewhere and can just waltz away to greener pastures then come storming back once the trees have grown back – whenever that will be. This is lazy science and lack of analysis.

We object to your putting forth a project carrying a "may effect" ruling for grizzly bears. This is unacceptable. SPLAT lies in core recovery habitat for the Greater Yellowstone population of grizzly

bears, as well as right in a “least-cost” wildlife corridor. Grizzly bears are under increasing pressure from many human activities making secure areas like South Plateau all the more essential to their survival. We should err on the side of caution with species like grizzlies and set aside core areas like this one.

Most of our comments were not adequately addressed, so all of our original comments still stand.

For Montanans for Gallatin Wilderness

Philip Knight