

*Nancy Schultz states Objection on the
South Plateau Area Landscape Treatment Project*

April 24, 2023

Nancy Schultz
[REDACTED]
[REDACTED]
[REDACTED]

Subject: On March 15, 2023, the Custer Gallatin National Forest reinitiated the opportunity to object to the South Plateau Area Landscape Treatment Project. The Gallatin Wildlife Association (GWA) would like to take advantage of this opportunity. The following objection pertains to the decision by the Custer Gallatin National Forest (CGNF) to accept the Proposed Action Alternative in order to conduct vegetative treatments on the South Plateau area west of Yellowstone National Park. The Environmental Assessment of 2022 only presented two alternatives: the No Action alternative and the Proposed Action alternative. The latter was chosen with a "Finding of No Significant Impact."

Responsible Official:

Leanne Marten, Regional Forester, Northern Region, Region 1, U.S. Forest Service.
Project to be completed on the Custer Gallatin National Forest, Hebgen Lake Ranger District.

Standing:

Original Comments on the revised EA release were submitted November 5, 2022.

Rationale:

In matters pertaining to the South Plateau Landscape Treatment Project on the Custer Gallatin National Forest, GWA will state our objections as a result upon the agency's "finding of no significant impact" (FONSI) of the Proposed Action. We cannot understand how that finding was derived when one considers the many issues we have raised of biological integrity and biodiversity.

I Object Because:

I object to the FONSI as I have several misgivings about the Proposed Alternative.

I agree with the statements made by Gallatin Wildlife on Climate Change. To not take documented climate change data into this enormous vegetation management project is unacceptable.

The science is out there. I do not support the automatic harvesting or thinning of trees simply because it was the practice of the last century. The Custer Gallatin National Forests needs to look for new alternatives.

I object that more aspects of the Vegetative Treatments have not been evaluated.

Vegetative Treatments:

I object to the premise that thinning and harvesting are proper ways to manage a forest. This seems to be the methodology that is in play in today's society.

- I believe that the context of the area is important and should be the deciding factor.
- The elevation is 6700' and the soil is volcanic, ryolite and obsidian, which is why only lodgepole grows there.
- The soil does not hold moisture and that is why only lodgepole can grow there.
- It was clearcut in the 60's, and what we see now is what has grown back in 60 plus years
- The lodgepole forest is uniform.
- We spent two days at South Plateau and sampled the size of the lodgepole, the average was 5.8 inch diameter.
- The small size of lodgepoles in SP make me question the timber value of the project.
- The wood processing facility in Livingston, MT was burned and closed recently; now where will the timber go? At what environmental cost?
- How much timber can be produced from a 5.8 inch tree? One 2x4?
- The fire history of lodgepole forests is once every 200-300 years.
- I found very common, uniform age trees, all lodgepole until we got close to the continental divide and then a mixed forest.
- The forest floor is uniform cover of short grasses.
- would the majority of the south Plateau end up in debris piles like I have seen on other CGNF treatment sites?
- The forest service often says timber jobs for local mills. In Gallatin County, .2% of jobs are timber related, 99.8% are non timber jobs.

I object that there has not been more emphasis on the effects to wildlife from this project and the CGFS plan to make this area recreation emphasis.

- The area will become a recreation emphasis in the latest plan on the CGNF and this project ensures it; however the area needs to be protected for wildlife
- The forest service does not adequately evaluate the impact on ESA listed species like the grizzly and lynx.
- The 56 miles of roads will have an impact.
- The forest service does not adequately evaluate the lack of wildlife connectivity. The best connectivity route is the Continental Divide, which has been identified

by the forest service. In [fseprd595911.pdf](#), Ecological connectivity withing and around Custer Gallatin National Forest: An analysis to inform forest planning.

- The forest service gives no guidance even though scientists say it will have negative impacts, which the forest service needs to address.
- Maps of the project show how little of south plateau will be undisturbed, which will have huge impacts to wildlife including ESA listed species and many, many Species of Concern mammals, network of existing roads and trails and the popularity of snowmobiling.

I Object that the negative affects of this project on the Greater Yellowstone Ecosystem have not been evaluated

The importance of the area for the Greater Yellowstone Ecosystem has been known for decades. An assessment done in 2002 titled, A Multicriteria Assessment of the Irreplaceability and Vulnerability of Sites in the Greater Yellowstone Ecosystem published in Conservation Biology, August 2002 states that the area around West Yellowstone a tier 1 site (the most important) that contributes the most to conservation goals. All of the South Plateau vegetation management project is designated tier 1.

I object that wildlife, threatened and endangered species are not evaluated more thoroughly

I agree with all of the comments that Gallatin Wildlife makes on the effects to wildlife, endangered and treated species. A couple of recent studies are pertinent and the findings incorporated in a more thorough evaluation

A recent study; An Inconvenient misconception: Climate change is not the princial driver of biodiversity loss; Conservation Letters 2022 states that climate change is highly relevant, but it is habitat loss is the greatest threat. This project will result in a huge amount of habitat loss.

Another study; Enhanced regional connectivity between western North American national parks will increase persistence of mammal species diversity; Scientific Reports 2023 states "Linking the Yellowstone-Glacier assemblages by eliminating barriers to movement in identified mammal dispersal pathways and by incorporating adjacent wildernesses areas and known ungulate migratory routes in a protected area network would greatly enlarge available habitat. " This is especially significant for threatened, endangered and species of concern.

The Proposed Solution:

I fail to understand how CGNF or any entity can review the science before them, with the proposed actions, and determine the SPLAT Project would have a "finding of no significant impact" to wildlife. I disagree with that finding. In the alternatives presented before the public, I believe the better solution would be the "No Action" Alternative.

The link between Objection and prior Formal Comments:

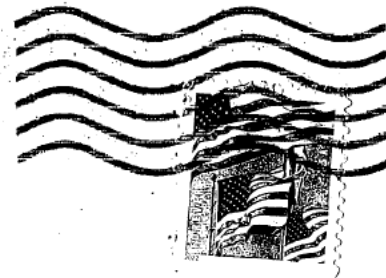
These comments of today are similar if not identical to those of my original position. My position, rationale, and the science I use have not changed. If anything, there is additional science that reinforces my reasoning.

Nancy Schultz

N Schults
420 N 10th Ave
Bozeman, MT
59715

BILLINGS MT 591

24 APR 2023 PM 2 L



RECEIVED

APR 25 2023

R1 RO MAILROOM

APR 25 2023

RECEIVED

Reviewing Officer

Northern Regional Office

Attn: South Plateau Area
Treatment Objective

26 Fort Missoula Road

59804-770425

Missoula, MT 59804