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Comments: Regarding the U.S. Forest Service provided public notice of the Revised Draft Environmental Assessment (EA) of the South Plateau Landscape Area Timber (SPLAT) Project of the Custer Gallatin National Forest (CGNF), I write in opposition of the finding of no significant environmental impact.

The very rationale for the treatment is significant environmental impact! Our difference is that you may think the impact is good because historically the USFS got its political clout from keeping the logging and wood products industry happy, but I see negative results across the range of impacts on wildlife, wildlife habitat, native plants, soils, surface water, and nature's carbon storage capability.

There will be fragmentation and loss of habitat. That's what logging does. Crashing bird populations alone argue against this. Birds need naturally diverse habitat niches, including old growth, medium growth, young growth, understory plants and litter. The natural secession forest is much better than a single-age replacement plantation! Of course, hunters love game animals in clearings, but creating such clearing to support hunters is not an environmental conservation measure. There are plenty of game animals protected by hunting regulation. Birds, insects, fungi, native ground cover are necessary for biodiversity, for resilient and healthy habitat.

Logging, aka treatment, and the accompanying roads and heavy equipment compaction of soil, you would also contribute to aridification, already a severe problem throughout the West. And severe wildlife corridors and habitat connectivity. Wildlife need wildlands, not permanently scarred terrain inviting mechanized recreation to further tear up the native plants and soils. Runoff from the compacted soil would also negatively affect surface water.

Endangered and threatened species do not understand a signing pointing go-around this logging wasteland or tree plantation. They require undisturbed habitat, not more human- and machine-introduced stressors. Grizzly bears are the big and popular example. Wolverine are an important example, as one was spotted on the north end of the North Beach Peninsula, north of Oysterville, Washington, far out of its native territory in 2020, unlikely to find a mate or a snowy winter, but searching for territory in which to live. The subject land is more appropriate and natural habitat for the wolverine, but logging disruptions would only push the species far away. Canada lynx, wolves, and pine marten are other mammals of concern.

But mostly ignored are the crashing bird and insect populations, many not yet processed through the Endangered Species Act but obviously qualifying. Yellowstone National Park lists threatened and endangered birds of the area: peregrine falcons, bald eagles, and whooping cranes (<https://yellowstonenationalpark.com/birds.htm/>). The State of Montana lists amphibians, birds, fish, mammals, reptiles, and invertebrates of concern as well as threatened and endangered (<https://fwp.mt.gov/conservation/species-of-interest/>). Here the lesser known LeConte's Sparrow, Chestnut-collared Longspur, Mountain Plover, Black-billed Cuckoo, Boblinks, Pinyon Jay, Cassin's Finch, Clark's Nutcracker, and other bird species get recognized for their population declines. Please do not think that you can remove via treatment fragile habitat and not significantly add stress to already stressed species. Birds are just an example. As president of the 400-member Sacajawea Audubon Society serving this area, I use birds as an example, but only an example of what is not adequately protected under the proposed plan.

Rather than rant on about the disregard for conservation of this wonderful habitat, I will fully endorse the attached comments previously submitted by Clinton Nagel on behalf of the Gallatin Wildlife Association.

Sincerely,

Anne Millbrooke

