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Organization:

Title:

Comments: Amanda Williams, NEPA Team Leader

South Plateau Area Landscape Treatment Project

Custer Gallatin National Forest, West Zone

Dear Ms. Williams,

I appreciate the opportunity provided to comment on the South Plateau Area Treatment Project (SPLAT).

I've been traveling with my parents in the Yellowstone area, including the parcel of land to be 'treated', since I was 5 years old. I attended Montana State University for the sole reason of its inclusion in the greater Yellowstone ecosystem. Upon graduation, in 1977, I have made Montana my home and raised my family traveling throughout the ecosystem. We hike, camp, and greatly enjoy glimpses of the rare collection of wildlife that the ecosystem supports.

When reading through the Environmental Assessment what struck me was the scope of treatment (tens of thousands of acres), the fifteen years the project would entail, what appears to be a lack of consideration of 'treatment' impact on wildlife and a lack of assessment of the treatment's impact on the ecosystem over time. A 30-day review period for an EA covering a project of this magnitude, with so few actual details regarding what is planned, the lack of alternatives and no indication as to how evidence-based decisions were reached appears to violate the National Environmental Policy Act. For something that will damage habitat, is ongoing for the next 15 years, that borders Yellowstone National Park, occurs in endangered species grizzly bear habitat along with critical habitat for endangered Canada lynx, takes place within a wildlife migration corridor, and will impact not only summer range for elk and year-round range for moose but present a damaging environmental impact on a number of other species, I question whether an EA is an adequate measure of cumulative impact or includes geographic context. A determination of FONSI would be highly questionable.

The rationale that logging is needed for potential forest problems (mistletoe, bark beetle, WUI fire impact) seems premature. The lack of actual locations where the problems exist is troubling. Estimates of infestation are not specific. The area is sparsely populated unless there is unmentioned planned development in the works. Perhaps the emphasis on recreation is the reason for allowing roads along with logging to mar the landscape and drive off wildlife. The semantics (logging company PR?) of suggesting logging as "treatment" equates to killing the patient just in case they become sick. Were these infestations to occur, the "treatment/logging" solution ignores the value of downed wood and the historic value of fire to habitat.

Fire prevention by using clear cutting has been refuted in the literature and by observers of recent fires. Climate change brings years of drought and record-breaking heat. One of the noted impacts of clear cutting, road building and wheeled recreation includes leaving landscapes vulnerable to establishment of invasive species, many of which burn readily and fuel fast moving fires along with the lack of trees to serve as windbreaks or offer precious cooling & humidity. Logging simply damages habitat and landscapes, it offers no solution to climate change.

I see no evidence that your team has had a chance to review the Greater Yellowstone Climate Assessment. The SPLAT plan does not integrate the assessment's findings into its plan. With the warming changes now occurring and predicted to continue, there is no guarantee, or even reasonable assumption that the forest will be able to grow and return to its current state. While looking through your Carbon Storage/Sequestration references there is no mention of any information more recent than the 2007 Intergovernmental Plan on Climate Change and you quote the EIS from the 2022 Custer Gallatin Forest Plan. More current outside studies are needed to justify your choices.

On a global scale, industrial logging is a significant source of global greenhouse gas emissions although its climate impact remains largely unacknowledged and unregulated. The clearcutting of climate-critical forests around the world, particularly in countries in North America, which includes the Northern Rockies and of which the Greater Yellowstone ecosystem is included, is incompatible with meeting global climate targets and achieving commitments under the Glasgow Leaders' Declaration on Forests and Land Use.

I have taken the liberty of attaching some documents that support my comments.

Thank you for your work on this project. Please let your decision be based on science and not economics.

Sincerely,
Linda Healow