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First name: Steve

Last name: Kelly

Organization: Council on Wildlife and Fish

Title:

Comments: September 13, 2023

Mary Erickson

Forest Supervisor

Custer Gallatin National Forest (CGNF)

Re: Goose Creek fuel break (CE)scoping comments

Dear Supervisor Erickson,

Please accept the following public comments on the proposed Categorical Exclusion for the Goose Creek fuel break project behalf of the Council on Wildlife and Fish, Native Ecosystems Council, the Alliance for the Wild Rockies, and Center for Biological Diversity.

These comments are being sent/submitted via email, and we request confirmation of receipt via email to troutcheeks@gmail.com.

This is an inappropriate use of the categorical exclusion (CE). Fuel breaks cause permanent, irreversible and irretrievable damage to the landscape. The forestwide (programmatic) adverse, cumulative impacts to wildlife are more catastrophic than wildfire.

Please analyze and disclosed to the public how the CGNF selected specific sites for these [lsquo]fuel breaks.[rdquo] Fuel breaks on ridgetops ignore the importance of ridgetops for wildlife travel and migration. This is a major wildlife linkage corridor. What were you thinking? Where is the programmatic wildlife impacts analysis?

Please analyze and disclose how and where the CGNF Forest Plan has developed programmatic constraints to limit the role and scope of direction pre-fire vegetation management projects.

It appears there is neither an accurate programmatic description of the scope (gross acreage/forestwide aggregate acreage). The unlimited increase in potential for vegetative management projects is [ldquo]significant new information[rdquo] that requires a Forest Plan amendment to establish an amended/updated management direction (standards and guidelines) that was unforeseen, and never analyzed, in the current CGNF Forest Plan. The Forest Plan amendment process must incorporate the new programmatic impacts (direct, indirect and cumulative) as a result of new laws that have resulted in significant changes that must be analyzed and disclosed to the public.

Whitebark pine is a listed species that seems to be in the crosshairs of these projects in general, and this one in

particular. Is there a [take] permit? Are you just going to build [temporary] roads over top of whitebark stands, and then mow down what's left? BTW, there is no such thing as a [temporary road]. It can, and will be reopened and used, as [needed] to reenter the area and to [maintenance] on the same project area as soon as the vegetation grows back. Don't you need to consult with the U.S. Fish and Wildlife Service? I'm pretty sure you do or stand in violation of the ESA.

The programmatic cumulative effects of these fuels management projects, combined with new, massive burning projects, plus all the miles of roadbuilding far exceeds the cumulative effects analysis anticipated in the Forest Plan. This is precisely why, and when (now), a new programmatic environmental analysis is required.

This is a violation of both the NEPA and the National Forest Management Act (NFMA). This [piecemealing] constitutes a violation of the NEPA and the Administrative Procedures Act (APA).

And, finally, please disclose to the public evidence of original (absolute) title to these lands, in order to clear up any question of the illegitimacy/legitimacy of the federal government's claims of clear ownership/possession.

Sincerely,

Steve Kelly, President

Council on Wildlife and Fish
P.O. Box 4641, Bozeman, MT 59772; 406-920-1381 and;

Sara Johnson, Director, Native Ecosystems Council, PO Box 125, Willow Creek, MT 59760; phone 406-579-3286; sjjohnsonkoa@yahoo.com. and;

Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-459-4936; wildrockies@gmail.com. and;

Kristine Akland, Center for Biological Diversity, PO Box 7274, Missoula, MT 59807; phone 406-544-9863; kakland@biologicaldiversity.org.