

Data Submitted (UTC 11): 3/21/2018 6:00:00 AM

First name: Jerry

Last name: Jacobs

Organization: Yellowstone Radio Club

Title:

Comments: Thank you for allowing me to submit follow up comments in behalf of the Yellowstone Radio Club pertaining to the Custer Gallatin National Forest Plan Revision.

As I explained, the Yellowstone Radio Club here in Billings has been involved in a recent FS exchange between the FS and Grizzly Peak, owners of the Red Lodge Ski Area Resort. The exchange, which will be completed shortly, will result in a radio communications repeater site owned by the Yellowstone Radio club, coming under the jurisdiction of Grizzly Peak, and not the FS where we held a valid permit for over 40 years. As of Monday, March 19, we signed an agreement with the Grizzly Peak folks which will allow us to keep our communications site on "their" land when the exchange is completed..

As the exchange was moving forward we commented on the EA during the various stages of the FS planning process. During one of the comment periods Jeff Guildhouse, the FS Recreation/Lands person in Red Lodge, asked us to submit our comments to your office which we did. Jeff also received a copy of all of our comments. One of the reasons Jeff asked us to send our comments to you was that we asked the FS to address the availability of a FS communications site referred to as the Grizzly Peak site located on FS lands above the town of Red Lodge, Mt . According to Jeff this particular communications site was in use many years ago, but the use had been terminated. Our interest in the Grizzly Peak site is predicated on the unknown tenure we will have with the Grizzly Peak folks. Simply stated, we are concerned that we, and other communication site users, may have their permits terminated by Grizzly Peak in the future. Because our repeater and communication site is critical in assisting local, city, state and Federal agencies during emergency or disaster events, it is imperative that we seek alternative communications sites on FS land to protect our long-term interests.

Anyway, when we asked to have these concerns addressed in the Grizzly Peak Exchange EA your office refused stating that this matter would be addressed in the upcoming Custer Gallatin National Forest Plan Revision document. Even though we missed the March 5th deadline for commenting on the revision, our previous comments, which you should have a copy of in your files, are of permanent record with the FS, and must now be entertained in the Forest Plan Revision. Our request is that you incorporate those comments into the current revision document with no penalty for having missed the March 5 comment deadline.

Thank you for your time and consideration. If you have any questions, please contact me at your earliest convenience.

Jerry Jacobs, Secretary, Yellowstone Radio Club

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\_\_\_\_\_ Attached as part of previous submission for reference \_\_\_\_\_

From: tomrichmondmt@gmail.com [mailto:tomrichmondmt@gmail.com]  
Sent: Monday, July 18, 2016 6:10 PM  
To: Gildehaus, Jeff S -FS <jgildehaus@fs.fed.us>  
Cc: jschmidt@redlodgemountain.com; Kelly, Virginia -FS <vkelly@fs.fed.us>  
Subject: Comments on Red Lodge Mountain Exchange- Environmental Assessment: RLM LEX 06-23-2016

July 18, 2016

Mr. Jeff Gildehaus, Team Leader

Beartooth Ranger District

6811 HWY 212 South

Red Lodge, Mt. 59068

RE: Comments on Red Lodge Mountain Exchange- Environmental Assessment: RLM LEX 06-23-2016.

Dear Mr. Gildehaus:

Please consider the following comments pertaining to the Red Lodge Mountain Exchange Environmental Assessment.

First, you should be aware that on July 12, 2016, we met with Mr. Jeff Schmidt, General Manager for the Red Lodge Mountain Resort. He informed us that it is the intent of the Red Lodge Realty Holdings (AD/JMA) to allow the Yellowstone Radio Club (YRC) to continue to use its current amateur radio facilities located within the Palisades Electronics Site by granting a use authorization similar to the lease we have with the USFS. As we mentioned in our meeting with you, also on July 12, 2016, you have our permission to send a copy of our current USFS Lease, BEA 95, to Mr. Schmidt for his review.

We agreed in our meeting with Mr. Schmidt that AD/JMA and YRC would work together to sign a use

authorization document, agreeable to both parties, before the Red Lodge Mountain Exchange is consummated. As an indication of their good faith, Mr. Schmidt also agreed to send YRC a "Letter of Intent" or other suitable document, confirming the intent of AD/JMA to continue to authorize our facilities. We mentioned to Mr. Schmidt that whatever authorization AD/JMA is willing to issue, and the terms therein, should not be less favorable than what is currently authorized in our USFS Lease. It was noted in our discussions with Mr. Schmidt that Ad/JMA has no current plans to develop the Palisades Electronic Site.

Regarding the Environmental Assessment (EA), section 4.3.1.3 minimizes the potential impacts associated with the YRC losing its use authorization after the exchange is consummated. The impacts are more than the simple statement of "loss of services or increased costs to service recipients." As mentioned in our March 15, 2015 e-mail to Ms. Traute Parrie, District Ranger, our .360 repeater provides emergency and disaster communications to the Billings Community including local hospitals, National Weather Service, law enforcement agencies, city, State and Federal governments. Our radio communications extend not only to Billings, but also to the towns of Custer, Harlowton, and Big Timber, Mt., an area roughly encompassing a 100 mile radius. Basically, when all other forms of communication fail, the .360 repeater, and it's ancillary facilities, are the last resort to provide communication to, from and within these local communities. Certainly, the importance of this repeater cannot be underestimated.

The impacts associated with not having the .360 repeater available for these communities includes the potential for loss of life and property, reduced law enforcement capability, reduced and/or loss of effective weather reporting services, ineffective communications at Red Cross shelters and hospitals, and loss of contact with outside responders needed to assist in emergency and disaster events. These adverse and direct impacts to the above communities need to be stated in the EA. You should also discuss the hardship and negative impacts that would be forced upon YRC to physically relocate its current facilities to another suitable site. This is especially true since we are a small volunteer organization with limited funds, manpower, and equipment that would be needed to relocate our facilities to a secure, topographically elevated site that has access and power available.

Additionally, the EA is silent regarding alternative sites for communication purposes that may be available on USFS lands. In regard to this concern you mentioned that a potential alternative communication site may be available on Grizzly Peak in T.7S., R.19E, Section 35, NW1/4. Although you stated that this was an abandoned communication site that would likely be addressed in a future USFS planning document we believe it is important to explore this potential alternative in the EA, and we request that you do so.

Thank you for the opportunity to comment.

Sincerely,

Tom Richmond, President

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Electronic cc to the following:

Mr. Jeff Schmidt, General Manager

Red Lodge Mountain Resort at: jschmidt@redlodgemountain.com

Ms. Virginia Kelly, Forest Plan Revision Team Leader

U.S. Forest Service, Custer/Gallatin Forest at: vkelly@fs.fed.us