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Comments: I have several comments on the supplemental EIS, both substantive and procedural.

*The FS is on dubious legal ground in deciding to proceed with a Supplemental EIS. The initial EIS for the GRLA project was dismissed by the Courts. A new EIS is required to proceed.

*The FS is on dubious legal ground in proceeding to maintain the sale boundaries, prescriptions planned and contracts let during the dismissed EIS. This is particularly the case when the sales have been modified since initially planned and assessed. For instance, trees initially marked after consultation with adjacent landowners in the Upper Red Lodge Creek drainage were subsequently modified - 'unmarked as leave trees', removing the bulk of the tree patches - resulting in less visual, wildlife and soil erosion buffer. This action and others of its ilk further erode public trust.

*Neither the initial EIS nor the supplemental EIS sufficiently outline and assess road and transportation plan impacts and alternatives. This is particularly the case when plans directly impact adjacent private landowners.

*Since the initial EIS was conducted, and dismissed, the State of Montana has conducted substantial vegetation treatments on their block immediately to the east of the Upper Red Lodge Creek area. This 1200 acre set of treatments provides a new significant and effective fuel break, obviating the purpose and need as outlined in the initial EIS.

*The majority of visitors to the National Forest do so for recreation (hiking, walking, skiing, snowshoeing, camping, fishing, horseback riding, bike riding, running sled-dogs, hunting), for non-commercial timber products (teepee poles, firewood, post and pole, Christmas tree). All of these highly valued and valuable activities would be negatively impacted by current plans that will result in increased weeds and non-native species (conditions the USFS consistently acknowledges they have no future funds and ability to address), increase erosion and sediment to streams, decrease visual and recreational quality, and increased wildfire start potential.

*Neither the dismissed initial EIS nor the Supplement adequately address and mitigate impacts to Threatened and Endangered Species - lynx, grizzly bear, northern goshawk, wolf among them.

*Both documents claim to be addressing hazardous fuels in the Wildland Urban Interface (WUI). This does not pass the 'red face' test on several fronts:

oUnless one is willing to define any vegetation as hazardous fuels, there are no hazardous fuels in the area. There are fuels, but only those well within ecological bounds. The area is ecologically complex mix of inter-digitated sagebrush grasslands and riparian areas with mid elevation mixed conifer and lodgepole pine stands. Hazardous fuels are generally determined to be those having missed more than one fire rotation. The only ecological communities meeting this definition in the GRLA area - at least the Upper Red Lodge Creek area - might be the sagebrush grasslands.

oTo cast the Upper Red Lodge Creek area as 'WUI' is ludicrous.

oSimilarly, any thought to 'assist' climate change by deliberately changing the species mix is mis-guided. This north-facing slope of the Beartooths is consistently modeled as retaining lodgepole pine under various climate change scenarios. As such, the Custer-Gallatin should be seeking to maintain and encourage this climate-threatened vegetation type.

*The Beartooth Face is a fire environment. The only way to eliminate wildfire threat to private lands is to remove all vegetation and maintain a ¼ - ½ mile or more zone of non-vegetation adjacent to other landowners. That, of course, is also ludicrous. Homes burn not because fires happen, but because embers fall on receptive surfaces. It is each homeowners responsibility to ensure their property is sufficiently mitigated.

*The FS has few enough dollars to spend. Put them where there is actual social and ecological need. Don't waste them on this unnecessary - ecologically and socially deleterious - project in the Upper Red Lodge Creek drainage. Put them to work closer to the actual WUI around Red Lodge, or elsewhere in Region 1.

*Please incorporate my comments from all prior GRLA comment periods.

The Custer-Gallatin needs to focus its efforts on areas of actual need. Spending scarce resources on an area that does not need - and does not meet appropriate definitions for - treatment is not a wise use of taxpayer funds.

It is an abdication of responsibility to sustainably manage our national forests.

Let's be clear: there is only one reason for the Custer-Gallatin and Region 1 to pursue this project and that reason does not appear in the Forest Service's mission statement. It is an attempt to meet current Administration demands for at least doubling targets on timber and hazardous fuels. However, the result is a below-cost timber sale that will degrade ecosystem and visitor experience now and into the future.

The USFS can, should, and needs to do better.

Respectfully submitted,