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Comments: As the son of a USFS ranger, I am familiar with the FS's all too frequent approach to forests as crops, hence, its unfortunate inclusion in the Dept of Agriculture, which must be reconfigured. This organizational, existential flaw also comes at great expense to wildlife.

Your SPLAT #57353 must not be implemented. This 23 square MILES of tree cutting, road building and burning will do serious damage to all manner of wildlife habitat for wolverines to grizzlies. Wildlife have already experienced a massive population loss in the area of 80% over the last half century. And this project will make that even worse.

This clearly demonstrates yet another major systemic issue for the USFS, namely the subsidizing of logging companies via the inappropriate prices paid for national forest timber. Logging companies pay far more for timber harvested off of private lands than they do for timber that the USFS puts up for sale. And YOU build roads, etc. for them. This is the essence of corruption.

You are not planning to conduct EIS. You must change your process to include one. You must take into account the traffic on local highways, which already produce an unacceptable number of accidents and wildlife fatalities. You are planning to burn grass along these roads, which attracts bison to the new grass. Obviously, you must take into account the impact of this sale on climate change, both in regard to carbon released and carbon not sequestered. We are reaching a tipping point on catastrophic climate change. We can no longer count on the rainforests of the Amazon to solve the carbon sequestration we need. You must be part of the solution instead of part of the problem.

Specifically:

- \* Wildlife biologists need to evaluate how logging, building roads, and prescribing fire near highways in Hebgen Basin affects migratory buffalo.

- \* Fire can be beneficial for habitat in the range of migratory buffalo, but it needs to be used in a manner that doesn't draw buffalo onto or across highways.

- \* The Custer Gallatin's analysis - CUMULATIVELY logging 30+ square miles of habitat and building OVER 70 miles of road on the South Plateau and North Hebgen determined to be somehow beneficial to wildlife species - is utterly ridiculous and simply doesn't pass muster.

- \* The Custer Gallatin needs to conduct an EIS of all logging and road building already underway and planned in Hebgen Basin, including in the South Plateau and North Hebgen.

- \* Cumulatively logging over 20,000 acres (over 30 sq mi) of habitat and building 71 miles of roads is a major action and significant long-term harm to wildlife, soils, and water quality.

- \* World class scenic views and visitors hiking the trails along the Continental Divide will also be harmed.

- \* More roads should be REMOVED - not built - to provide secure habitat for grizzly bear, moose, and elk, and reduce sediment running into creeks and rivers in Hebgen Basin.

Resiliency, the oft-repeated purpose of SPLAT, also means the ability of wildlife species to withstand systematic

pressures, random perturbations, and harmful events. According to Shaffer & Stein, *Safeguarding our Precious Heritage* (Oxford University Press 2000), "resiliency is also essential for the long-term survival of species."

The size, degree, and duration of the Custer Gallatin's logging and road building projects impairs the resiliency for wildlife species and the ecosystem in Hebgen Basin.