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Comments: West Yellowstone, MT. In the newly proposed South Plateau Landscape Area Treatment Project (SPLAT), the U.S. Forest Service is proposing to punch 56 miles of roads into the Hebgen Basin in order to log, bulldoze and/or burn 23 square miles of prime wildlife habitat, extracting over 80 million board feet of timber. That amount of logging would require about 25,000 logging trucks to haul out of the forest.

"This is a massive road building and logging project," according to Darrell Geist, Buffalo Field Campaign's habitat coordinator. "It's in Hebgen Basin where migratory buffalo roam the National Forest, and where the Custer Gallatin is undertaking another project to log nearly 9 square miles of wildlife habitat and plow over 15 miles of roads into the buffalo's winter range and spring calving grounds." Yellowstone's bison are a candidate species for listing as threatened under the Endangered Species Act.

In addition to impacting wild bison - which are nowhere mentioned in Forest Service's sparse documentation of the proposal - the roadbuilding, logging, and burning will occur in or near habitat for a wide diversity of threatened wildlife species, including grizzlies, lynx, and wolverines. According to a recent report, wildlife populations have already been reduced by an average of 80% in just the past 50 years, in large part due to habitat destruction and degradation like SPLAT.

This staggering decline in wildlife populations is, in part, attributable to mismanagement of public wildlands by agencies like the Forest Service. As Nez Perce environmental scientist James Holt, who serves as BFC's Executive Director, points out: "According to the Forest Service - who we must remember are paid by our tax dollars, and not by the timber industry - this intensive logging, burning and road-building of 32 square miles of habitat in the Yellowstone Ecosystem, some of the best wildlife habitat in the world, is insignificant and will not give rise to any adverse environmental impacts for the public to be concerned about!"

The Forest Service is not planning to prepare an Environmental Impact Statement to examine the cumulative impacts of the two projects, which is what federal law requires anytime a project has the potential to adversely impact wildlife, water quality, soils, the climate, or the human environment.

Prescribed burns proposed in SPLAT are of particular concern to the Buffalo Field Campaign, according to Geist. "The Custer Gallatin intends to use fire near Highway 20, where a buffalo was killed just last week in a vehicle collision. What we have learned from 25 years in the field," Geist continued, "is fire draws buffalo to new grass the following spring, during calving season. The National Forest appears unaware it is creating a hazard for buffalo and drivers alike by burning along highways."

Recent collisions on Highways 20 and 191 have resulted in the deaths of 4 bison, 4 moose, and a grizzly, according to BFC Communications Director Tom Woodbury. "What the public deserves is to have our Forest and Park Service experts spending their time and resources devising strategies for diverting wildlife away from death traps," Woodbury said, "not continuing to create new death traps."

BFC is encouraging people to send comments to the Forest Service opposing SPLAT, or at least demanding the kind of careful environmental impact analysis and concern that Yellowstone's wildlife merit.

According to the Park Service, the total amount of large mammals struck inside the Park from 2017-2021 was 241. Outside the Park, according to insurance statistics, Montana is the worst state for animal collision fatalities, with 24.6 animal crash deaths per 1 million vehicles, and 43 human fatalities from animal crash deaths between 2009 and 2018. According to the Montana Department of Transportation, there were 10 fatalities in animal

involved crashes in 2020, the latest year such statistics are available.

Summary of BFC Comments on SPLAT

As such, an Environmental Impact Statement is required to provide the public an analysis responsive to the significant ecological impacts expected from the Custer Gallatin's logging and road building projects.

* Wildlife biologists need to evaluate how logging, building roads, and prescribing fire near highways in Hebgen Basin effects 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 nearly 32 square miles of habitat and building 71 miles of road on the South Plateau and North Hebgen is somehow beneficial to wildlife species - doesn't pass muster.

* The Custer Gallatin needs to conduct an Environmental Impact Statement of all logging and road building underway and planned in Hebgen Basin, including in the South Plateau and North Hebgen.

* Cumulatively logging over 20,000 acres of habitat and building 71 miles of roads - the equivalent of building a road from West Yellowstone to Ennis, Montana - 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.

Buffalo Field Campaign urges the Custer Gallatin to withdraw the SPLAT.