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Comments: 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.

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.

I urge the Custer Gallatin to withdraw the SPLAT.

Thank you