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Comments: We opposing "SPLAT", and demand the kind of, careful, environmental impact analysis, and, concern that "Yellowstone" 's wildlife, merit!

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. Our family members implore the "Custer Gallatin" to withdraw the "SPLAT"!

This is a, massive, road building, and, logging, project! It is 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". 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", 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, 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! 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, not continuing to create, new, death traps!

According to the "Park Service", the, total, number 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 does NOT 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 - does NOT 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 MUST 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"!