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Organization:

Title:

Comments:

To Forest Supervisor Mary Erickson and District Ranger Jason Brey,

I am writing to object to the Custer Gallatin National Forest logging wildlife habitat and building more roads in Hebgen Basin as proposed in the South Plateau Landscape Area Treatment Project (SPLAT).

I object to the plan for logging 14,658 acres - extracting 83 million board feet of timber - and building over 56 miles of roads, impacting 7,764 acres of roadless wilderness in the South Plateau. The Custer Gallatin also intends to burn 1,804 acres, including in the vicinity of highway 20.

The SPLAT is, in addition to the North Hebgen Multiple Resource Project, a 5-year project underway on the Custer Gallatin National Forest to log 5,670 acres and build over 15 miles of roads in the bison's calving grounds and winter range on Horse Butte peninsula, from Fir Ridge to Red Canyon, and Duck Creek to Cougar Creek.

Together, the Custer Gallatin's logging and road building projects in Hebgen Basin are a significant long-term ecological impairment requiring a comprehensive Environmental Impact Statement.

The Custer Gallatin's SPLAT analysis does not mention buffalo or bison. Bison are migratory and have a keen sense of smell. They will seek out new grasses in burned forest the following spring.

The Custer Gallatin is proposing several prescribed burns near highway 20. Fire is likely to draw bison towards the new grasses - and vehicles traveling at high speeds on highway 20. Clearly, the Custer Gallatin has completely failed to address how bison will be affected by your actions.

The Custer Gallatin's revised Environmental Assessment for SPLAT does not sufficiently address and analyze the cumulative long-term harms and disturbances to numerous wildlife species, soils, and water quality. As the Custer Gallatin noted, cumulative effects "will likely last between 15 and more than 100 years."

Recent collisions on Highways 20 and 191 have resulted in the deaths of 4 bison, 4 moose, and 1 grizzly bear, according to BFC Communications Director Tom Woodbury. "What the public deserves is to have the 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."

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.

Habitat for Canada lynx, grizzly bear, wolverine, moose, elk, and 14 migratory birds is present and will be significantly harmed by the SPLAT. In addition to the harmful impacts of SPLAT, the North Hebgen Multiple Resource Project is also harming the habitat of grizzly bear, Canada lynx, wolverine, peregrine falcon, wolf, moose, goshawk, nesting eagles and migratory birds.

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.

Cumulative effects lasting for over a century require an Environmental Impact Statement. The public is best served by performing 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 bison.

- * Fire can be beneficial for habitat in the range of migratory bison, but it needs to be used in a manner that does not draw bison onto and 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 review.

- * Cumulatively logging 20,328 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.

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

- * 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 stated purpose of SPLAT, also means the ability of wildlife species to withstand systematic pressures, random perturbations, and harmful events.

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.

The original population of the bison is estimated to have been around 60 million but after years of massacre, it was reduced to about one thousand by the end of the 19th century.

Planet Earth belongs to all species and governments should stop supporting the expansion of human activities that are putting other species in danger of extinction. It is also time to start returning land to the Native Americans that was forcibly taken from them. Native Americans and bison have suffered more than enough since the white colonization of their homeland.

I lived in Australia from 1970 to 1992. Since I did not wish to be part of a country that is the result of genocide against indigenous peoples and in which the large-scale killing of native animals, logging of forests and destruction of the environment continue to take place, I returned to my country of origin and encourage others to do the same. To further reduce my ecological impact, I am vegan and live in high-density housing that is located near public transport.

I urge the Custer Gallatin to withdraw the SPLAT.

Sincerely,

Simon Validzic

