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Organization:

Title:

Comments: USFS:

I am writing to voice my strong opposition to the USFS proposal to construct 56 miles of invasive and destructive roads into the Hebgen Basin, an important habitat for wildlife, including our national mammal - the endangered American buffalo. This massive project is named the South Plateau Landscape Area Treatment Project (SPLAT), a dangerous endeavor that would entail logging, bulldozing and/or burning 23 square miles of prime wildlife habitat, extracting over 80 million board feet of timber -- an amount of logging that would require about 25,000 logging trucks to haul out of the sensitive forest ecosystem.

This area is 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 and are America's National Mammal. Yet the protection of these magnificent animals is nowhere mentioned in the proposal, and ignores the negative impacts such a project would wreak on other wildlife like 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, mainly due to habitat destruction and degradation such as the SPLAT proposal would cause. Such mismanagement of our public wildlands by agencies such as the Forest Service, which is resulting in a shocking decline in wildlife populations, must not be authorized as it would result in significant, adverse impacts on this environment, contrary to the agency's claims. The loss of some of the best wildlife habitat in the world for the sake of pandering to a small group of special interests is unacceptable!

The Forest Service is funded by taxpayers, NOT the timber industry.

Furthermore, the Forest Service has no intention of preparing an Environmental Impact Statement (EIS) to analyze the cumulative impacts of the two projects, which federal law requires whenever a project has the potential to adversely impact wildlife, water quality, soils, the climate, or the human environment. Not only must there be an EIS, but wildlife biologists must also evaluate the negative affects logging, building roads, and prescribing fire near highways in Hebgen Basin would negatively affect migratory buffalo.

Particularly concerning is Custer Gallatin's plan to use fire near Highway 20, where a buffalo was killed recently in a vehicle collision. This incident illustrates how fire draws buffalo to new grass the following spring, during calving season. The National Forest fails to grasp its complicity in creating a hazard for both buffalo and drivers by proposing to burn along highways.

Although fire can be beneficial for habitat in the range of migratory buffalo, its use must not draw buffalo onto or across highways.

Recent collisions on Highways 20 and 191 have led to the senseless deaths of 4 bison, 4 moose, and a grizzly. To avert such tragedies, Forest and Park Service experts must dedicate their time and resources devising strategies for diverting wildlife away from death traps, not creating new ones.

The Custer Gallatin's analysis that this project would somehow be beneficial to wildlife species does not ring true.

A detailed EIS of all logging and road building activities -- current and planned in Hebgen Basin, including in the South Plateau and North Hebgen must be conducted, including serious consideration of the welfare of Yellowstone's wildlife in the targeted area.

The cumulative logging of over 20,000 acres of habitat and building 71 miles of roads is a massive action which would result in significant long-term harm to wildlife, soils, and water quality. Not to mention the harm such actions would do to the unique scenic views and visitors hiking trails along the Continental Divide.

Such planned environmental destruction that would so adversely impact wildlife and the public cannot be taken lightly.

If anything, more roads should be removed, not built, to protect 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. 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 greatly impairs the resiliency of wildlife species and the ecosystem in Hebgen Basin.

For the preservation of the Hebgen Basin ecosystem and the protection of its unique wildlife, especially our nation's last remaining endangered American Buffalo, I strongly urge the Custer Gallatin to withdraw the SPLAT proposal.

Thank you for your consideration.

Sincerely,