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Comments: South Plateau Project Comments11-5-2022
I am Nancy Schultz from Bozeman Montana. I've lived in Montana since 2000. I have a MS from Western Washington State University. I have worked as a a public school teacher for 30 years and as a park ranger in Mount Rainier National Park,

I have spent countless hours recreating and exploring lands throughout the Custer Gallatin National Forest, and have a keen interest in the ecology of Southwest Montana. I am on the board of Gallatin Wildlife Association and I put a great deal of effort into observing and understanding the physical and biological processes that are at work in the Greater Yellowstone Ecosystem. I have a long-standing pursuit of reading peer-reviewed scientific literature in the fields of forests, wildlife, fire management, human impacts, and climate change, to name a few - particularly those that focus on the GYE.

On October 14-15, 2022, I went on four wheeler and checked out the South Plateau project. I followed the roads on figure 8, a map of the Gallatin County Community Wildfire Protection Plan defined Wildland Urban Interface and fuels priority areas in the South Plateau Project area and figure 2 of the timber harvest and fuels reduction treatments. My purpose was to ground truth the forest service stated needs for the South Plateau project.
Forest Service stated needs for the project
Fuels management, road management, forest product and the need to do intermediate and regeneration harvest to reduce the risk or extent of and increase the resiliency to insect and disease infestation while providing wood product to loacl mills and to reduce fuels to increase fire suppression effectiveness and safety.
History of the area
The context of the area is important. The elevation is 6700' and the soil is volcanic, ryolite and obsidian, which is why only lodgepole grows there. The soil does not hold moisture and that is why only lodgepole can grow there. It was clearcut in the 60's. The lodgepole forest is uniform. A site will have trees that are 4-8 inches in diameter. We found one tree that was 18 inches, which ages it at about 90 years old. The small size of lodgepoles in SP make me question the timber value of the project.
Looking at aerial photos of the area, which borders Yellowstone NP, show the forests look the same. I also compared South Plateau with YNP along hwy 191 and saw the same vegetation pattern, lodgepole. This is what the volcanic soil supports.
The fire history of lodgepole forests is once every 200-300 years.
Both maps 8 and 2, show areas of treatment, 19,630 acres and the 56 miles of news roads. Figure 8 is the best example of the extent of roads building.
I found very common, uniform age trees, all lodgepole until we got close to the continental divide and then a mixed forest. The forest floor is uniform cover of short grasses. At a representative sample, I found the average diameter to be 5.8 inches. What would the timber value of that be? Or would the majority of the south Plateau end up in debris piles like I have seen on other CGNF treatment sites.

Fuels Management and fuel reduction areas are to be logged
Fuels management takes place in fuels priority areas in Figure 8. Figure 8 shows fuel removal for an excessive number of acres along the highway. Our observations showed small developments along the highway. These developments should have mitigation measures that have been proven to be the most effective.
After the vegetation treatment, what happens to the piles? Do they get hauled away and used for a good purpose? Burned, releasing CO2? I have photographed debris piles at forest service projects. The piles are not small; many are 300 feet long and 10 feet tall. Who will pay to remove the piles, or will they be burned?
Road Management
The roads I traveled on in an ATV were on were in good condition

Providing wood products to local mills

The forest service often says timber jobs for local mills. In Gallatin County, .2% of jobs are timber related, 99.8% are non timber jobs.

There are no local mills. Forest products go to mills in Deer Lodge or Livingston, both about 120 miles away.

The economic value to the local economy seems negligible.

The need for intermediate and regeneration harvest to reduce the risk or extent of and increase the resiliency to insect and disease infestation

The forest service says they need to harvest trees to reduce the risk of insect and disease. We covered 63 miles of the project area and we saw no insect infested or diseased trees. I question the need for this project.

Reduce fuels to increase fire suppression effectiveness and safety

Many projects seem to fall into this category and many projects deserve a much closer analysis to determine merit.

Reduce fuels to increase fire suppression, the object should be to increase safety and that is best done by mitigation areas around dwellings. The nearest town, west Yellowstone is buffered on the west by the old airstrip, to the north Rainbow Point has been treated and the south does not have vegetation up to the edge of town.

The area will become a recreation emphasis in the latest plan on the CGNF and this project ensures it. The CGFS said that this area does not qualify for wilderness because it is too small, there is a dense network of existing roads and trails and the popularity of snowmobiling. These factors limit the opportunities for solitude, however the area needs to be protected for wildlife

The forest service does not adequately evaluate the impact on ESA listed species like the grizzly and lynx. The 56 miles of roads will have an impact.

The forest service does not adequately evaluate the lack of wildlife connectivity. The best connectivity route is the Continental Divide, which has been identified by the forest service. However, this route will now be a log hauling road and be logged. The forest service says that the effects will be "temporary", whatever that means. For wildlife it means what? The forest service gives no guideance even though scientists say it will have negative impacts, which the forest service needs to address.

Maps of the project show how little of south plateau will be undisturbed, which will have huge impacts to wildlife including ESA listed species and many, many Species of Concern mammals, network of existing roads and trails and the popularity of snowmobiling. These factors limit the opportunities for solitude, however the area needs to be protected for wildlife

Bonneville Power Line

The Bonneville power line will be logged ½ mile on each side of the already existing cleared corridor with an access road that has a dedicated road by the power line. The additional miles of treatment will be a huge habitat problem for wildlife. Why do this? When I travel around Montana I look at power corridors and I do not see vegetation removal that extends ½ mile on each side. What are the Bonneville guidelines?

Communication Tower

The communication tower on the Continental Divide also gets a ½ mile treatment in Montana. Why do this for a metal tower? When I travel around Montana I look for similar clearing for communication towers, and I find none. What are the tower owner's requirements? Is a ½ mile treatment being done in Idaho? Or, only Montana? If only Montana, how does this project make sense?

National Continental Divide Trail One of Our National Treasures

Treatment, "logging" will go up to within a football field distance from the Continental Divide Trail and the "trail" will be used for a log hauling road.

In the 1996 plan had much of the area and along the continental divide managed for wildlife and winter range. This project will have an impact. How can these changes not impact wildlife? When other factors like climate change, population increases in the GYE area, increased recreation use are factored in the changes in the forest service plan for the South Plateau area make no sense for wildlife especially.

Questions

*What is the forest service definition of WUI, and why does it use the Gallatin County definition?

*Does the plan use the latest science on climate change, regeneration under senarious of future climate and fire? I do not see climate change addressed in this project.

*What is the carbon omission evaluation? How much will be produced in all phases of the project? If the forest is left intact, how much CO2 will it absorb? What is the current level of the forest CO2 absobtion vs what it will absorb after the project?
*The economics do not make sense, how will this pencil out? What is the value of the small timber present? Does the sale cover the project? What is the cost of transporting the timber, is that factored in? after the project, there will be a great deal of debris, how will that be treated? What is the cost? The bottom line for the economics is that less than 1% of Gallatin County are forest related jobs.
*What will the area look like after the project, will it support wildlife? Will there be adequate cover for wildlife? Will winter range be preserved? Will the connectivity corridor remain effective (along the continental divide to connect YNP to wildlife areas to the west? What will be the effect of 56 more miles of roads?
*The biological opinion says that lynx are likely to adversely affected. In the same opinion, critical habitat for the lynx is likely to be adversely affected.
*The biological opinion says that grizzly are likely to be adversely affected.
*The forest service says that wildlife will be displaced, but only temporarily, and the biological opinion says the grizzly is likely to be adversely impacted, as is the Canada Lynx.
*How can the forest service move forward with the South Plateau, knowing what the biological opinion states?

This project and the conversion of the West Yellowstone area to recreation emphasis fails to show how wildlife will be adequately protected, especially a threatened species like the grizzly, lynx and wolverine.
I feel that the forest service is at risk of misrepresenting the viability of its intended management for resilience, ecological integrity, and desired future conditions. This affects wildlife, especially threatened wildlife and the habitats that they require to be sustainable for the long term