

Data Submitted (UTC 11): 11/6/2022 12:53:08 AM

First name: Dorothy

Last name: Filson

Organization:

Title:

Comments: Public Comment on the South Plateau Treatment Project # 57353

Planet Earth is currently in Anthropocene, the 6th Mass Extinction, caused by human activities. At this time, unless extreme changes are made regarding the reduction of global warming gas emissions and the preservation of carbon sequestering sources (like trees), life as we know it on this planet will end. We are beyond the 11th hour. This is a state of critical mass for the survival of the planet and most species. Biodiversity of some kind might survive this phase of global extinction, but it will likely not have any resemblance to what currently lives here and thrives on the planet.

This is our last chance to have any hope of reversing this trend or making a significant impact on the destructive path that currently exists. There will be no "do-overs", no habitable living conditions for future generations or other species unless we act now.

Therefore, it is astounding that the Custer Gallatin National Forest (CGNF) is proposing a project that will do immense harm to an area that provides habitats to myriad fragile species that inhabit that area, and remove vast stands of timber that provide valuable "carbon sinks" so critically necessary at this time.

I am a 5th generation Montanan whose ancestors settled in Broadwater County in 1864. So, with their knowledge and experience of the flora and fauna of Montana and what I have observed myself, I have over 150 years of knowledge and experience of the Montana landscape. That can be both a blessing and a curse as I am acutely aware of the species that lived here just a generation or two ago, but are now absent or rarely seen.

I have met people from all over the planet who are captivated at the biodiversity that still exists when they visit Montana. It has been decimated long ago from most parts of the planet. And yet the CGNF seems so willing to sign off on the destruction of a huge swath of this prime treasure. With global warming, there is no guarantee that conditions would exist for seedlings to survive to replace the trees that are proposed to be cut down. And, the disturbance to animal species whose habitats would be disrupted and destroyed would likely result in them never coming back.

It seems quite obvious that the ultimate goal is to supply the timber industry with lumber and biomass for timber products. But, at what cost? Do we want Montana to be just another wasteland of vast expanses of dry, fire and flood-prone conditions?

I will focus on some of the endangered and fragile species that would be impacted.

Grizzly Bears, currently protected as a threatened species under the Endangered Species Act will be negatively impacted by this project.

From the EA: Draft Revised EA SPLAT.pdf pg. 59

"The proposed project would result in a temporary reduction in the amount of available denning habitat or denning habitat quality in the affected Subunits, but effects are expected to be negligible at the scale of the analysis area due to the amount of suitable denning habitat that would continue to be available in the vicinity. The proposed project would adversely affect grizzly bears by temporarily reducing secure habitat".

My objection: The EA includes no scientific evidence upon which to base this conclusion of "negligible impact" or that grizzly bears would return to a previous denning area that has been destroyed.

Canada Lynx, currently protected as a threatened species under the Endangered Species Act will be negatively impacted by this project.

From the EA: Draft Revised EA SPLAT.pdf pg. 56

"In the context of the Lynx Analysis Unit, this level of impact would be relatively large in the short term.

Accordingly, the proposed project may affect, and is likely to adversely affect lynx".

My Objection: The EA acknowledges that harm will occur to lynx, a threatened species. There is no justification offered for these threats. Apparently, it is assumed that Canada Lynx, a protected species, will just have to survive somehow while the federal protections they have in place are violated.

Wolverines will be impacted by this project. Wolverines have yet to be federally protected under the Endangered Species Act. However, efforts have been underway for two decades to federally protect wolverines in the lower

48 states due to their low population numbers and where climate change threatens their future.

From the EA: Draft Revised EA SPLAT.pdf pg. 67

"There are no established thresholds for these indicators that are used by the Forest as a target level for which to manage (Wolverine)".

My Objection: CGNF is conveniently, for their benefit, electing to not use scientific recommendations for wolverine management even though guidelines for wolverine management have been proposed by the USFWS.

From the EA Draft Revised EA SPLAT.pdf. pg. 67

"The Proposed Action may displace wolverine from the project area through disturbance of both individual wolverines and their prey (outside of winter), but wolverines would be able to alter their travel routes into adjacent areas to avoid project activities and, in the context of the analysis, the disturbance from this project would be relatively minor."

My objection: The EA does not offer any proof that the disturbance would be "minor". A "treatment area" of nearly 40,000 acres which will be fragmented by numerous clearcuts and more than 56 miles of roads hardly seems "minor".

The South Plateau landscape is an area abundant in wildlife of rich ecological biodiversity, grizzly bears, Canada Lynx, moose and wolverines. The healthy survival of a species relies on genetic diversity which depends on connectivity with other populations. This was not mentioned in the EA. Connectivity was mentioned only 11 times with 10 of those referencing Canada Lynx. Logging and road construction will exacerbate the fragmented ecosystem, impacting the well-being and survival of Canada Lynx, wolverine, grizzly bears and many other species.

The implantation of this project will be a barrier if not a violation of the Endangered Species Act by disrupting grizzly bear habitat and their corridor routes, habitat and ability to move freely on the landscape.

Our forests play a vital role in mitigating climate change. Until that is acknowledged and forests are protected and preserved, not just used as wood for construction, peril to the planet is imminent. With soil conditions and an increasingly warming planet, it is concerning that lodgepole forests would even grow back. Mature and old growth forests are more efficient in storing carbon. And white bark pine is an especially favored food source for grizzly bears. The clear cuts around Hebgen Lake are proof of the devastation on wildlife habitat and the unlikelihood of regrowth.

This forest plan seems indifferent to utilizing the best scientific evidence available for sound forest management and wildlife preservation.

It is also a violation of President Biden's directive, Executive Order 14,072 to conserve mature and old-growth forests for their wildlife, carbon storage and water protection values.

I am requesting that this project be withdrawn and an EIS prepared.

Grizzly bears, Canada Lynx, moose, wolverine and pine marten must be given priority in the Greater Yellowstone Ecosystem. It is one of the few places left on the planet where they still exist and the future viability of their species' survival must be protected.

Respectfully submitted.