

Data Submitted (UTC 11): 4/27/2023 8:54:51 PM

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Comments: Custer Gallatin National Forest

Forest Supervisor Mary Erickson

Northern Regional Office

26 Fort Missoula Rd

Missoula, MT. 59804

Re: SPLAT Project Objection

Supervisor Erickson,

The health and integrity of the Yellowstone ecosystem is increasingly being challenged through development, recreation and roading. This in turn threatens Yellowstone National Park itself. Can we realistically believe a warming climate, drought and increased human-centered activity will not harm the treasure that is Yellowstone? Previous submissions by myself and so many concerned citizens regarding the South Plateau Landscape Area Treatment Project (SPLAT) provide strong evidence including scientific evidence, supporting reasons to withdraw/stop the South Plateau project. I submit the following observations in an attempt to persuade the U.S. Forest Service and Custer Gallatin Forest Service in particular, to conclude this project benefits few, produces threats to the most iconic national park on the planet and disregards current science.

I use wood products and live in a wood-framed home. I will never deny that humans need wood for many uses as well as livelihoods. However, logging, especially clear-cut logging in sensitive, critical or impactful areas such as the South Plateau, is incongruent with a vital, healthy Yellowstone National Park and Yellowstone ecosystem. 5500+ acres of 'scattered clearcuts', realistically with a perimeter of associated post-logging fall down in excess of those 5500 acres, is unsuitable and unacceptable. The additional 11,000 acres proposed to be thinned and/or "treated", further moves this landscape toward a monoculture environment with subsequent reduction in integrity of the area and the ecosystem. In this era of a warming, drying climate, it makes no sense to log 'high', notoriously dry country where even replanted trees take decades to regrow to any harvestable age. The South Plateau area doesn't qualify by most standards for optimal wood production regrowth. Shouldn't we humans pursue our need for wood products from areas supporting faster regrowth potential?

Fire science has shown that almost NOTHING will stop certain forest fires in this era of hotter temperatures, increased wind events, increased wind velocity and abnormally dry fuels. The science has shown that clear cutting, thinning, landscape 'resilience treatments' have little ability to stop or slow fires. Some studies have shown forest 'treatments' sometimes actually increases fire potential. As part of its plan, if the Forest Service wants to help prepare the community of West Yellowstone, area summer homes and infrastructure to be more resistant to fires, there are other protective and preventative methods to pursue. Using less flammable building materials, creating defensive spaces with low flammable fuel loads surrounding the community/homes must be seriously considered if not mandated.

Outside of the town of West Yellowstone, individuals who build in the urban interface, in most cases, have built with the knowledge that they have built in a fire-prone environment. I see so many homes built with lack of attention to creating a safety zone or with an unwillingness to build with appropriate materials. Why should we, the public, wreck environmental havoc so close to Yellowstone to protect properties in which landowners refuse to do take advised precautions?

The Forest Service acknowledges the SPLAT project would impact habitat for "some" animals. A representative

remarked that "elk can find secure habitat in the Henry Mountains". This is a remarkably short-sighted statement: rather like telling people they can move to Ft. Collins (CO) if they don't like Denver. This project almost certainly impacts grizzly bears and flies in the face of recent decisions regarding logging in grizzly habitat. I also understand an estimated 4600 acres of moose habitat in the form of winter range will be affected. Given the tremendous negative impact a warming climate has on moose, this project seems to be throwing moose "under the bus". Moose are so intolerant of heat that it's absurd to add yet another stressor to their survivability. Rationalizing clear cutting, thinning or treating this area for habitat improvement or forest treatment is an absurd idea when in reality the impacts of this project will be to fragment this extraordinary habitat, making a vast area of habitat unusable for many animals.

Old growth trees are invaluable to the health of a forest. Without old growth, the forest loses an important component of habitat and its associated species of plants and animals. As important is the carbon contained in these trees. At a time when we all should be very, very concerned about a warming climate, are we so foolish to think that the carbon contained in these trees shouldn't be left in place instead of logged with subsequent carbon emissions? Finally, I'm perplexed that a Custer Gallatin spokesperson indicated that old growth tree numbers would be increased during the SPLAT project. What? Age and age alone defines "old growth". One doesn't "make" old growth by removing the oldest trees in a stand/forest, thus making younger trees instantly become the oldest in a stand.

This project will require 56+ miles of road to be built. Decommissioning and reconditioning these roads means they will still be "roads". Ungulates and carnivores use roadbeds to travel to different areas but so do poachers, bikers, motorcyclists, ATVs and other recreationists. These roads, even "decommissioned", will provide easy access to and are no deterrent to the forest and Yellowstone's furred and antlered inhabitants. Furthermore, "decommissioning" a road by regrading/reseeding by either the Forest Service or a logging company, would be too costly and wouldn't be done. Berms as a deterrent simply don't work as a 'closing' mechanism of roads. Roadbeds last for years as is evident in many national forests or parks.

I'm not a NIMBY (Not In My Back Yard). I realize we need wood and wood products. I simply believe we have to find and cultivate forests where wood production will be optimal and where we don't create harm to the environment, its inhabitants or to an area of international recognition (Yellowstone National Park). This is a request to do what is best for our treasured national park, the surrounding ecosystem, grizzly bears, moose and elk and our environment. This is a request to do what is right. There are other U.S.F.S. areas that meet requirements of sustainability and quicker regrowth and that will meet our human needs for wood products. Please withdraw the South Plateau (SPLAT) project for the good of Yellowstone and this unique ecosystem.