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Organization:

Title:

Comments: I oppose Stop commercial logging in Chalk Buttes on Custer Gallatin National Forest and ask the agency to respond to each of the following issues in the record:

I have a son who lives and hunts in that area and I am very concerned that the Forest Service is essentially ignoring its own studies and rules in approving commercial logging of 1,643 acres, and additional thinning (mechanical and hand) of 4,354 acres and burning in a prescribed manner 3,106 acres. As I understand it, a large part of the justification for doing this is wild fire reduction in addition to 'realizing the commercial value' of the timber.

My opposition is first because of the impact on the Elk populations that will come about with the destruction of their secure habitat that will be the result of this agency action. The secure habitat in the project area is already at 19 percent, well below the recommended 30 percent and yet the Forest Service approves it without explaining why it's ok to go below the already deficient baseline. No data or analysis is provided even for the 19 percent baseline let alone what might be left post logging.

In addition to the impact on the elk, there are other animals, plants and soils in the project area that will be affected or placed at risk - the northern long eared bat is on the endangered species list and will be impacted as will the oval leaf milkweed and Visser's buckwheat, which are both listed as species of concern and may be in the project area -- The EA references a Biological Assessment in the project record but says nothing about whether formal consultation has been completed, whether a Biological Opinion has been issued, or whether an incidental take statement is in place. These need to be done first before moving ahead with this project.

The agency must provide a quantitative site specific justification of why 19 percent secure habitat is adequate and why the further lessening of the available secure elk habitat is still acceptable. An EIS should be done to fully analyze the impacts.

As for wildfire reduction, the document states that crown fire potential is often underestimated due to limitations in the fire modeling and yet bases the FONSI on that very model and issues a finding of no significant impacts.

Without providing any information or supporting studies back this up. Why a FONSI and not an EIS?

As for the FONSI, it remains unsigned with no responsible official named, no title and no date. None of the certifying statement checkboxes are checked, though the document instructions direct that every box must be checked. Obviously the agency has not formally certified that the EA thoroughly considered NEPA-mandated factors, reflects expert judgment, or contains analysis adequate to inform the decision. This certification must be completed prior to moving ahead.

I oppose this project on the grounds that commercial logging and large-scale thinning would permanently alter thousands of acres of Custer Gallatin National Forest and the Forest Service has is moving ahead without properly studying the impacts or providing adequate time or notice to the public to understand the scope of what's being proposed or enough time to provide their feedback.