

Data Submitted (UTC 11): 4/28/2023 4:07:20 PM

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Organization:

Title:

Comments: SPLAT OBJECTIONS

To:

Reviewing officer

Northern Regional Office

Attention South Plateau landscape Area Treatment objection

26 Fort Missoula Road

Missoula, Montana 59804

SUBJECT: Glenn Monahan's objection on the South Plateau area landscape treatment project

FROM: Glenn Monahan

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April 29, 2023

Introduction

I am Glenn Monahan from Bozeman Montana. I've lived in Montana since 1974. I have a BS from Montana State University with a major in geology and a minor in biology. I have worked as a geologist, a public school science teacher, a park ranger in both Yellowstone National Park and Mount Rainier National Park, and as a member of a forest thinning crew.

I have spent countless hours recreating and exploring lands throughout the Custer Gallatin National Forest, and have an intimate knowledge of the flora, fauna, geology, and ecology of Southwest Montana. Frequently I combine my recreation time with my scientific training to both observe and understand 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.

Specific Objections to SPLAT

I herein assert that CGNF is employing Abuse of Discretion on many counts.

CGNF is choosing positions that are based on facts and science of its own choosing, although other science exists which does not support numerous aspects of this project.

In choosing to cherry pick scientific information for the purpose of forcing this project, CGNF is intentionally deceiving the public whom it serves, and this represents an egregious dereliction of duty.

CGNF practice of cherry picking science invalidates the entire project, since the public can not trust a single word of the supporting documents. As an example (and this was discussed in detail in my previously submitted comments on SPLAT) CGNF portrays Mistletoe as a dangerous, destructive plant whose existence is a threat to a functioning forest. In reality, Mistletoe is a native plant, that has many beneficial functions, particularly for wildlife, including birds and - particularly in winter - ground-dwelling herbivores, the latter which in turn, provide food for carnivores. And yet there is no acknowledgment of Mistletoe's benefits. Instead CGNF focuses only on its impacts to timber production.

Specifically:

1. Grizzly Bear. CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- a) support logging and road building in critical grizzly bear habitat
- b) support logging and road building in critical grizzly bear migration lands
- c) support logging and road building that will impact grizzly bear denning
- d) support logging and road building that will impact grizzly bear social structure

2. Wolverine. CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- support logging and road building in critical proven wolverine habitat
- support logging and road building in critical wolverine migration zone
- support logging and road building in rodent habitat that is crucial hunting area for wolverine year-round.
- support logging and road building that will impact wolverine social structure

3. Lynx. CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- a) support logging and road building in critical proven lynx habitat
- b) support logging and road building in critical lynx migration zone
- c) support logging and road building in rodent habitat that is crucial hunting area for lynx year-round.
- d) support logging and road building that will impact lynx social structure

3. Pine Marten. CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- a) support logging and road building in critical proven pine marten habitat
- b) support logging and road building in critical pine marten migration zone
- c) support logging and road building in rodent habitat that is crucial hunting area for pine marten year-round.
- d) support logging and road building that will impact pine marten social structure

4. Lodgepole Pine (*Pinus contorta*). CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- a) Condemn lodgepole forests for being a monocultural forest
- b) Predict extreme degrees of infestations of mountain pine beetle
- c) Predict extreme degrees of infestations of mistletoe
- d) Ignore the numerous benefits of mistletoe as a natural component of a healthy, functioning forest.

5 Wolves. CGNF is engaging in Abuse of Discretion by narrowly cherry-picking science to:

- a) support logging and road building in critical proven wolf habitat
- b) support logging and road building in critical wolf migration zone
- c) support logging and road building in rodent habitat that is crucial hunting area for wolves year-round.
- d) support logging and road building that will impact wolf social structure