



BUFFALO FIELD CAMPAIGN

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Buffalo Field Campaign comments on the South Plateau Landscape Area Treatment Project (SPLAT)

To Forest Supervisor Mary Erickson and District Ranger Jason Brey,

Buffalo Field Campaign objects to the Custer Gallatin National Forest logging wildlife habitat and building more roads in Hebgen Basin as proposed in the South Plateau Landscape Area Treatment Project (SPLAT).

Buffalo Field Campaign objects to the Custer Gallatin's plan for logging 14,658 acres – extracting 83 million board feet of timber – and building over 56 miles of roads impacting 7,764 acres of roadless wilderness in the South Plateau. The Custer Gallatin also intends to burn 1,804 acres, including in the vicinity of highway 20.

The SPLAT is in addition to the North Hebgen Multiple Resource Project, a 5-year project underway on the Custer Gallatin National Forest to log 5,670 acres and build over 15 miles of roads in the buffalo's calving grounds and winter range on Horse Butte peninsula, from Fir Ridge to Red Canyon, and Duck Creek to Cougar Creek.

Together, the Custer Gallatin's logging and road building projects in Hebgen Basin are a significant long-term ecological impairment requiring a comprehensive Environmental Impact Statement.

"Protecting the Last Wild Bison"

The Custer Gallatin's SPLAT analysis does not mention buffalo or bison. Buffalo, a migratory species, have a keen sense of smell and will seek out new grasses in burned forest the following spring.

As depicted on your map (Figure 2), the Custer Gallatin is proposing several prescribed burns near highway 20. Fire is likely to draw buffalo towards the new grasses — and vehicles traveling at high speeds on highway 20. Clearly, the Custer Gallatin has completely failed to address how buffalo will be affected by your actions.

The Custer Gallatin's revised Environmental Assessment for SPLAT does not sufficiently address and analyze the cumulative long-term harms and disturbances to numerous wildlife species, soils, and water quality. As the Custer Gallatin noted, cumulative effects "will likely last between 15 and more than 100 years."

Habitat for Canada lynx, grizzly bear, wolverine, moose, elk, and 14 migratory birds is present and will be significantly harmed by the SPLAT. In addition to the harmful impacts of SPLAT, the North Hebgen Multiple Resource Project is also harming the habitat of grizzly bear, Canada lynx, wolverine, peregrine falcon, wolf, moose, goshawk, nesting eagles and migratory birds.

Cumulative effects lasting for over a century require an Environmental Impact Statement. The public is best served by performing an analysis responsive to the significant ecological impacts expected from the Custer Gallatin's logging and road building projects.

- Wildlife biologists need to evaluate how logging, building roads, and prescribing fire near highways in Hebgen Basin effects migratory buffalo.
- Fire can be beneficial for habitat in the range of migratory buffalo, but it needs to be used in a manner that doesn't draw buffalo onto and across highways.
- The Custer Gallatin's analysis — cumulatively logging nearly 32 square miles of habitat and building 71 miles of road on the South Plateau and North Hebgen is somehow beneficial to wildlife species — doesn't pass muster.
- Cumulatively logging 20,328 acres of habitat and building 71 miles of roads — the equivalent of building a road from West Yellowstone to Ennis, Montana — is a major action and significant long-term harm to wildlife, soils, and water quality.
- The Custer Gallatin needs to conduct a comprehensive Environmental Impact Statement of all logging and road building underway and planned in Hebgen Basin, including in the South Plateau and North Hebgen.
- World class scenic views and visitors hiking the trails along the Continental Divide will also be harmed.

- More roads should be removed — not built — to provide secure habitat for grizzly bear, moose, and elk, and reduce sediment running into creeks and rivers in Hebgen Basin.

Resiliency, the oft-repeated purpose of SPLAT, also means the ability of wildlife species to withstand systematic pressures, random perturbations, and harmful events. According to Shaffer & Stein, *Safeguarding our Precious Heritage* (Oxford University Press 2000), “resiliency is also essential for the long-term survival of species.”

The size, degree, and duration of the Custer Gallatin’s logging and road building projects impairs the resiliency for wildlife species and the ecosystem in Hebgen Basin.

Buffalo Field Campaign urges the Custer Gallatin to withdraw the SPLAT.

Sincerely,



James L. Holt, Sr.
Executive Director



Darrell Geist
habitat coordinator