



BUFFALO FIELD CAMPAIGN

April 29, 2023

Objection Reviewing Officer
USDA Forest Service, Northern Region
Attn: SPLAT
26 Fort Missoula Road,
Missoula, Montana 59804

SPLAT Project Objection

Dear Reviewing Officer,

Buffalo Field Campaign hereby files our objection to the Custer Gallatin National Forest's Decision Notice and Finding of No Significant Impact on the South Plateau Landscape Area Treatment Project.

Buffalo Field Campaign objects to the Custer Gallatin logging wildlife habitat and building more roads in Hebgen Basin.

Custer Gallatin's plan for logging 14,658 acres and building over 56 miles of roads impacting 7,764 acres of roadless wilderness in the South Plateau is in addition to the North Hebgen Multiple Resource Project, a 5-year project underway to log 5,670 acres and build over 15 miles of roads in the bison's calving grounds and winter range on Horse Butte peninsula, from Fir Ridge to Red Canyon, and Duck Creek to Cougar Creek.

Our primary objection is the cumulative environmental effects that "will likely last between 15 and more than 100 years," according to your analysis.

The lack of a proper cumulative environmental effects analysis is evident in the statements made in the Custer Gallatin's Land Management Plan Consistency Table (at 114-115) finding many of the components apply for bison but claiming: "Bison generally do not occur in the project area and area south of Highway 20."

Buffalo Field Campaign specifically asked the Custer Gallatin to perform a cumulative effects analysis of the South Plateau Landscape Area Treatment Project and North Hebgen Multiple Resource Project, and any other foreseeable logging and road building project in the basin.

"Protecting the Last Wild Bison"

Instead, the Custer Gallatin ignored our comment and performed an incomplete and disconnected analysis, and failed to analyze the cumulative effects of logging and road building projects underway, and planned for the foreseeable future in Hebgen Basin.

The Custer Gallatin's reasoning that 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 is false. Draft Decision Notice and FONSI at 19 (Forest Service biologist Endangered Species Act determination of "likely to adversely affect" the grizzly bear and lynx).

"The beneficial effects of the action do not bias my finding of no significant environmental effects." Draft Decision Notice and FONSI at 13.

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 with significant long-term environmental effects.

As depicted on your map (Draft Revised Environmental Analysis Figure 2 at 6), the Custer Gallatin is proposing several prescribed burns near highway 20 which is likely to draw bison to the growth of new grasses and result in collisions with vehicles traveling at high speeds.

Simply stating that bison are not allowed to be there because managers have drawn an arbitrary boundary excluding bison from their National Forest range and habitat, that the SPLAT covers but a small area of the "tolerance" zone and is seldom used by a few bulls, and therefore there will be no effects on bison, is false (see attached photos).

The Central herd bison is also not secure and has not recovered from a severe loss in population from 3,553 to 1,432 (2005–2022) with a low of 847 counted in 2017. Geremia, Status Report on the Yellowstone Bison Population to the Superintendent, at 5–6 (Sept. 29, 2022).

A portion of the Hebgen Basin is designated as a year-round tolerance zone for bison, but the project area does not overlap this zone. . . Based on the low historic use of the project area combined with the fact that the bison population is secure in the planning area, I have determined the project has a very low potential to impact bison.

Draft Decision Notice and FONSI at 11.

Seasonal use of the corridor along Highway 20 is in most years non-existent, and in others extremely low . . . Given the historic use of the portion of the seasonal tolerance zone in the South Plateau project area and the fact that the bison population is secure in the planning area, it was not analyzed under this project.

Comment Consideration and Response 243 - Wildlife/Animal #33-3 at 123.

The project area includes zero acres of the year-round tolerance zone. A small portion of the project area totalling 1,784 acres, generally lying north of the South Fork Madison River and 6973 Road and west of the town of West Yellowstone, lies within a seasonal tolerance zone for bison. . . While use of the Highway 20 corridor by a small number of bison (generally bulls) does occasionally occur, it would not be considered a migratory pathway into or out of the Park.

Comment Consideration and Response 243 - Wildlife/Animal #33-5 at 123.

Approximately 1.8 miles of temporary road and 1,077 acres of potential treatment are situated within that portion of the seasonal tolerance zone in the project area.

Comment Consideration and Response 243 - Wildlife/Animal #87-3 at 124.

That portion of the project area lying within the tolerance zone for bison is very small and receives very little and intermittent use, typically by lone bulls moving along the Highway corridor.

Comment Consideration and Response 243 - Wildlife/Animal #154-1 at 125.

Bison do not read Forest Service documents; the wildlife species is scoping the landscape and migrating in response to a changing environment and that includes prescribed burning within their range and habitat.

When the south side of the Madison River burned in 2008, bison, including matriarchal groups, responded the following spring by foraging on the new grasses through the spring calving season into August (see attached photos).

Creating conditions that will bring bison into conflict with vehicles is exactly what we want to avoid. This Forest Service created condition will become unavoidable if it is not on the Custer Gallatin's radar of analysis and recognized in the agency's decision taking precautionary actions to avoid such harm.

Buffalo Field Campaign urges the Custer Gallatin to withdraw the agency's SPLAT decision. In the alternative, prepare an Environmental Impact Statement commensurate with the long-term effects expected from the U.S. Forest Service's road building and logging program in Hebgen Basin.

Sincerely,

A handwritten signature in blue ink that reads "James L. Holt, Sr." in a cursive style.

James L. Holt, Sr.
Executive Director

A handwritten signature in black ink that reads "Darrell Geist" in a cursive style.

Darrell Geist
habitat coordinator



Female bison and calves near Highway 20 (May 2009). Darrell Geist photo.



Female bison and calves on the south side of the Madison Arm of Hebgen Lake (August 2009). Darrell Geist photo.



Female bison and calves on the south side of the Madison Arm of Hebgen Lake (August 2009). Darrell Geist photo.