

Date submitted (Mountain Standard Time): 5/18/2019 12:00:00 AM
First name: Ramona
Last name: Ehnes
Organization: Form - 5 Grouped (Alternatives, Timber, Facilities, Livestock, Burned)
Title:
Official Representative/Member Indicator:
Address1: 622-13th Ave So
Address2:
City: Great Falls
State: MT
Province/Region:
Zip/Postal Code: 59405
Country: United States
Email:
Phone:
Comments:
Comment on Custer Gallatin Forest Plan DEIS

The Forest Service failed to provide a "No Action" alternative.

The Forest Service failed to provide a "Preferred" alternative.

Page 89 of the DEIS. Objectives (FW-OBJ-RT) 03. All alternatives (B, C, D, E) propose to close additional miles of roads which further limits access. No alternative was provided for comment which increased access opportunities.

Page 94 of DEIS. Objectives (FW-OBJ-REC) 01. All alternatives (B, C, D, E) propose to "Remove or relocate existing recreation facilities including dispersed sites. The "specialist report" recommended expanding camping and recreation facilities yet. No alternative was provided to the public which would have increased these recreation opportunities.

I request the Forest Service provide a "No action" and a "Preferred" alternative. I request the Forest Service provide alternatives that increase road and trail access. I request the Forest Service provide alternatives that increase recreation and camping facilities.

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The Forest Service failed to provide a "No Action" alternative.

The Forest Service failed to provide a "Preferred" alternative.

Livestock grazing is an effective way of reducing risk to wildfire. Livestock grazing also benefits wildlife habitat and provides soil nutrients increasing forage productivity. Section 2.4.5, pages 74-78 of the DEIS, Permitted Livestock Grazing has no mention of the benefits of livestock grazing. I request the Forest Service include information on the benefits of livestock grazing.

Page 77, Guideline (FW-GDL-GRAZ) 02 states: "should have end of season stubble height of hydrophilic vegetation along the greenline be at least 4-6 inches". This is an unrealistic forest wide requirement and I request the Forest Service insert language to allow more site-specific requirements on end of season stubble heights. The Custer portion or eastern part of the Custer Gallatin provides 81% of livestock grazing and this area is dry grass land. Much of this area does not produce stubble heights of 4-6 inches without grazing.

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The Forest Service failed to provide a "Preferred" alternative.

Page 50, Objectives (FW-OBJ-FIRE) 02 suggest a minimum of 37,500 acres burned annually. While on page 81, Objectives (FW-OBJ-TIM) 03 alternatives B, C, D and E suggest vegetation management treatments on 5 to 8 thousand annually. Vegetation treatment is superior to fire as smoke from both wildfire and prescribed burns produce toxic chemicals which according to Montana DEQ website can cause "premature mortality". According to reports the people in Seeley Lake are still experiencing reduced lung function nearly a year after the fires in 2018.

I request the Forest Service increase the annual vegetation treatment acres in an effort to reduce fire severity, reduce toxic chemical emissions, and increase available timber resources to support local mills and communities.

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The Forest Service failed to provide a "Preferred" alternative.

Page 79, Table 15, Lands suitable for timber production of approximately 500 to 600 thousand acres while annual treatment acres on page 81, alternatives B, C, D and E reflect a mere 5 to 8 thousand acres treated annually. This very limited amount of treatment (<1% of suitable) will never effectively treat what is needed.

Page 79 and 80 of the DEIS states: "Both the projected wood sale quantity and the projected timber sale quantity are limited by the projected fiscal capability...[hellip]". The DEIS failed to include mention of an increased capacity based on the statutory appropriation of the Montana Legislature to the Good Neighbor Authority which will increase funding for planning and implementation of timber sales and increased sale quantities. I request the Forest Service increase projected timber sale quantities based on the State's contribution to this effort.

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The Forest Service failed to provide a "No Action" alternative.

The Forest Service failed to provide a "Preferred" alternative.

As stated on page 84 2.4.8, Code of Federal Regulations 228, "Citizens are guaranteed the right to prospect and explore minerals reserved from the public domain and open to mineral development. The disposal of these minerals is non-discretionary." Yet the last line of "Leasable minerals" on the same page states: " the disposal of these mineral resources is discretionary." Please explain this discrepancy in statements.

The DEIS under 2.4.8 does not discuss in FW-GO-EMIN, FW-STD-EMIN, FW-DC-EMIN, or FW-GDL-EMIN the protection or guaranteed right to access these minerals. I request the Forest Service include language reflecting the rights protected under 36 CFR 228 and the Mining Law of 1872 in the Standards and Guidelines section of the DEIS and also in the language of the new Forest Plan.