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Comments:

Dear Sir or Madam:

I am writing to comment on the Draft Revised Forst Plan for the Custer Gallatin National Forest and its accompanying Draft EIS, both issued in March, 2019.

In general I find the plan and EIS very distressing. I think an objective look at the scope and writing of the plan show that recent years cuts in funding for the Forest Service have led to the Forest Service making decisions that have led to an unmanageable entity, the Custer Gallatin National Forest. It combines two National Forests of immense geographic scope and perhaps even greater environmental and management diversity. A quick reading shows that the compromises the Forest Service made to combine everything from rangelands to alpine forests, from lands in the Great Plains geographical province to the temperate Northern Rockies geography have combined to introduce errors of fact, and lack of serious consideration of the management problems and issues that have just as great diversity and complexity as the much too large administrative boundaries.

I mention two instances but I believe that there are many more. (1) The previous forest plan was oriented around ranger districts. Those districts contained a suite of natural features and management conditions that were geographically moderate, and contained biology and public interests that were common, and manageable and comprehensible. The present documents are organized around geographical units that sound logical, but in fact are so large that any single document cannot begin to address management complexities and public interests, and apparently are too large for the Forest Service to be accurate about the details of these geographies. Consequently management proposals are so general as to not be meaningful. One example: The Absaroka Beartooth Wilderness encompasses 68% of the Absaroka Beartooth Mountains Geographic Area, yet on p. 157 of the plan (the section entitled Distinctive Roles and Contributions [3.5.2], subsection Social and Economic characteristics), it gets exactly one sentence of 18 words generally describing the wilderness area. In contrast the Stillwater Mine, a part of the Stillwater Complex encompassing about 2% of the geographic area is featured in the lead paragraph in this subsection, with enough description to indicate its importance to the area and the nation. Shouldn't the social and economic feature of the geographic area covering 68% be the lead discussion on social and economic characteristics? (2) The document itself has apparent errors that are not connected to understanding or forming an opinion about a resource decision, but are errors making impossible for a reader to follow a particular presentation of fact and policy. One example here: In Section 3.5.7, Stillwater Complex, the discussion in Paragraph 2, page 163, there is a reference to a map in Appendix B, which should detail additional desired conditions. When examining Appendix B, the map does not exist and according to the note there, will not be prepared until the selected alternative management scheme is made in the final document. How does an interested party evaluate the Forest Service intentions and comment on a non-existent map, that is critical to the desired resource condition?

I am a resident of Stillwater County which is within the Absaroka Beartooth Mountains Geographic Area, so I naturally paid more attention to those components. If there are errors such as I pointed out in this section, it makes the entire document suspect. I recommend a thorough edit, and hope to be able to actually understand the management prescriptions in the final document.

I am particularly concerned with the Stillwater Complex proposed in this plan and EIS. It is a new designation to specifically address the Sibanye-Stillwater Mines in the Absaroka Beartooth Mountains Geographic Area. In

three alternatives a considerable acreage is set aside for the Complex. Yet I see no detailed analysis that would delineate expected activities, their impacts on the environment and what measures Forest Service would put in place to mitigate impacts. I believe a more detailed analysis is necessary to select any alternative other than Alternative D, which zeros out the Stillwater Complex Acreage. I also could not find any analysis of the effects of Forest Service decisions on adjacent private lands. Much of the rock and ore from these mines comes from deposits controlled by the Forest Service. Their authorization of mining creates huge amounts of waste rock, very large tailings deposits, as well mine ore separation facilities, all of which are located off the Forest Service lands. I believe NEPA requires the Forest Service to assess all the impacts of their actions, including those that occur outside the forest boundary. Please address this in the final EIS.

Sincerely,

Burton D. Williams