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RE: Notice of Intent to Prepare an Environmental Impact Statement

Forest Supervisor Erickson,

On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to submit comments on the Custer Gallatin National Forest Plan Revision Proposed Action (Proposed Action).

Formed in 1919, NPCA's mission is to protect and enhance America's National Park system for present and future generations. NPCA gives voice to those who support the national parks and broader park adjacent ecosystems with over 1.3 million members and supporters, including nearly 7,000 in Montana. NPCA has a long history of advocating for the protection of national parks and park resources, both inside park boundaries and on adjacent lands by working to connect our national parks with the surrounding landscapes and maintaining habitat connectivity that is important for wide ranging wildlife species.

The Custer Gallatin National Forest (CGNF) borders much of the northern and western boundaries of Yellowstone National Park. Therefore, management decisions and activities on the CGNF have the potential to impact Yellowstone and park resources including wildlife, water and air quality, and visitor experience. With regard to the CGNF planning process, we are particularly interested in the future management of habitat for species and human activities on the forest. To that end, we urge the Forest Service to consider the following suggestions and concerns in order to strengthen protections within the CGNF Forest Plan. These comments address suggestions for these areas as follows:

- Bison
- Westslope and Yellowstone Cutthroat Trout
- Aquatic Invasive Species
- Lynx
- Wolverine
- Ungulates

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- Grizzly Bears
- Whitebark Pine
- Connectivity
- Recreation
- Timber
- Mineral Development
- Climate Change

Bison

Overview:

Millions of bison once roamed North American; today the species exist on only a minor portion of the species historic range. One of the few remaining wild herds is found in Yellowstone National Park and on limited adjacent land, including the Custer Gallatin National Forest. The CGNF is one of the only national forests that contains habitat currently occupied by bison; however, the species has not been restored to ecologically sustainable numbers in Montana. Bison fulfill a unique forest value for local residents, forest users, national park visitors, and tribes across the region. Management of Yellowstone bison is currently directed by the Interagency Bison Management Plan (IBMP), developed by an interagency committee that the CGNF participates in. On the CGNF, bison are currently found on limited habitat in the Madison, Gallatin and Henrys Lake areas, as well as the Absaroka Beartooth.

Recommendations:

Habitat Management: Yellowstone bison are currently managed by the IBMP, which as the result of a court settlement provides management strategies for bison. The IBMP outlines tolerance zones, which, as of 2015, includes year-round habitat west of Yellowstone on the CGNF from the Horse Butte area north to the Taylor Fork area, and allows bull bison north of the park to Yankee Jim Canyon. NPCA recognizes that the Forest Service defers to the IBMP when managing for bison tolerance on the CGNF. However, the Forest Service can and should manage for bison habitat within and beyond current tolerance zones. Specifically, bison habitat management strategies on the CGNF should apply to all areas where bison are currently permitted, as well as all identified bison habitat on the forest. Managing for bison habitat across the forest system is critical for future changes in the IBMP tolerance zones. Future opportunities to expand tolerance zones will depend in part on available suitable habitat. The Forest Service should ensure that forest activities do not compromise future bison habitat, and that vegetation management restores habitat to support bison in the future. In doing so, the Forest Service can play a leading role in bison management and expansion.

Recreation: A wide variety of recreation activities are available throughout current year-round bison habitat, winter range, and identified potential bison habitat. This creates the potential for conflict between bison and humans, as well as disturbance to bison. To reduce conflict between bison and humans, signage should be posted at parking lots, facilities, trailheads, and campsites to inform people about bison in the area and how to behave around bison to avoid conflict.

Grazing: We recognize that the CGNF, and all national forests, are managed for multiple uses, including grazing. Concern over the co-habitation of bison and cattle on public lands is one of the justifications that IBMP partners use to limit bison tolerance. The CGNF can alleviate this justification for not expanding tolerance by not establishing new grazing allotments in year-round, winter, or potential habitat. The CGNF should also work with willing current allotments holders to retire current allotments if the allotments are preventing increased bison tolerance.

Vegetation Management: The Proposed Action includes guidelines aimed at improving bison habitat through vegetation management, but these guidelines could better support bison habitat and bison management. Specifically, FW-GDL-WLBI-01 states that “Within bison tolerance zones, vegetation management projects that could improve bison habitat near residential or high-use areas are designed to minimize conflict.” The definition of “high-use” is vague and lays the framework for a human-first management strategy. Rather, this guideline should be rewritten as “vegetation management projects that could improve bison habitat near residential or high-use areas will be conducted in coordination with outreach, education, and increased monitoring to minimize conflict.” These changes will ensure a “wildlife-first” approach and preserve important habitat for bison now and in the future.

Human Conflict: The Proposed Action recognizes the potential for bison-human conflict as bison expand into available habitat on the forest. FW-GDL-WLBI-02 states that “Except to minimize human conflict, management won’t limit bison expansion into unoccupied habitat within state zones.” As written, this guideline is vague and potentially limits the potential for bison to expand into all identified habitat. Recreation opportunities—and therefore human conflict opportunities—exist throughout year-round and winter range areas. The guideline inadequately protects bison habitat and the ability for bison to access available habitat on the forest. The guideline could be restated as “bison expansion into unoccupied habitat in state zones will be monitored and accompanied by increased outreach, education, and monitoring to minimize conflict.” The Forest Service should take steps to manage bison alongside human use, and focus on education and monitoring to ensure safety, rather than attempts to separate humans and bison on the forest.

Species of Conservation Concern: Bison are a native species that continues to persist but has not been restored to ecologically sustainable numbers in Montana. Bison are regarded as a *Species of Greatest Conservation Need* in Montana (Montana Fish, Wildlife and Parks), *Near Threatened* (International Union for Conservation of Nature), and *Near Critically Imperiled* (MT and WY). The 2012 Planning Rule acknowledges that the Forest Service may lack the authority or the ecological capability to maintain a viable Species of Conservation Concern (SCC) population on its lands; in those cases, the Forest Service is required to develop plan components and work with other parties to contribute to the viability of the species across its range. As an IBMP partner, we appreciate the Forest Service’s contributions to bison management, but suggest the Regional Forester lists bison as a SCC to provide consistency across the board for management of this species, as intended by the Interagency Bison Management Plan and this 2012 Planning Rule guideline.

Additionally, the SCC designation applies to native species that are not included in federal categories but have declining populations, habitat threats, restricted habitat range or other factors

of concern and for which the best available scientific information indicates substantial concern about the species' capability to persist over the long term in the plan area. Designating bison as a SCC is justified as bison are facing threats to populations and habitat due to current management plans and tolerance zones, declining in population and habitat without the ability to utilize the full extent of their historic range, and facing restricted habitat within the planning area due to boundaries determined by the IBMP. We encourage the Forest Service to act upon its ability and responsibility to contribute to bison conservation by utilizing opportunities beyond the IBMP, and designating bison as a SCC. It is not valid to rely on the IBMP as a surrogate for forest plan area persistence, discussed below.

In addition, the Forest Service should reconsider what it found to be “best available science” in deciding not to list bison as a SCC. The planning rule requires the application of best available scientific information in determining SCCs. The U.S. Fish and Wildlife Service (USFWS) recently made a negative 90-day finding on bison regarding a proposal to list them under the Endangered Species Act. The Forest Service “reviewed and accepted” the USFWS decision as best available science “indicating that none of the factors present substantial concern to long-term persistence in the plan area, since the same population of bison occur in both areas.” However, a court recently remanded the 90-day finding to USFWS because of a failure to appropriately consider best available scientific information, contrary to what the Forest Service argues in their rationale. The Forest Service will need to address this issue moving forward.

Westslope and Yellowstone Cutthroat Trout

Overview:

The Proposed Action acknowledges declining populations of Westslope cutthroat trout and Yellowstone cutthroat trout throughout the montane portions of the CGNG. Westslope cutthroat trout currently occupy only 9% of their historic range, and Yellowstone cutthroat trout occupy 46% of their historic range. The most significant threats to these species are hybridization, aquatic invasive species, habitat alteration, and climate change. Because Westslope cutthroat trout occupy such a small portion of their historic range, it is essential that the final CGNF plan includes adequate habitat management measures to better ensure Westslope cutthroat trout are able to resist impacts from these three factors.

Recommendations:

In-Stream Flows: The final plan should go further to include standards and guidelines aimed at in-stream flows preservation. In-stream flows will continue to be an essential resource for native populations of cutthroat trout to remain resilient to climate change. NPCA recommends a proactive approach to securing additional in-stream flows over the life of the CGNF plan to reduce the severity of climatic changes threatening both Westslope cutthroat trout and Yellowstone cutthroat trout.

Conservation Watershed Network: NPCA applauds the Forest Service for including a section on Conservation Watershed Networks in the Proposed Action, to connect watersheds supporting Westslope cutthroat trout and Yellowstone cutthroat trout populations. If or when restoration projects are completed with new populations of Westslope cutthroat trout or Yellowstone

cutthroat trout in coordination with the state of Montana, NPCA recommends the addition of new stream reaches into the conservation watershed network subwatersheds.

We also urge the Forest Service to commit that no irreversible harm will occur in stream reaches with native cutthroat trout, which are listed in the watershed conservation network. As stated in the Proposed Action, riparian and wetland vegetation types represent less than 3% of the plan area. It is imperative that this habitat is conserved for generations to come. In addition, if continued reduction in historic range, NPCA recommends the Regional Forester to review the possibility of Westslope cutthroat trout as a Species of Conservation Concern.

Species of Conservation Concern Determinations: NPCA recommends the Regional Forester to review the possibility of Westslope cutthroat trout and Yellowstone cutthroat trout as Species of Conservation Concern. As stated in the Proposed Action, some local populations of Westslope cutthroat trout could be susceptible to further hybridization, isolation, and other stressors such as habitat degradation and climate change. Although the Proposed Action acknowledges that local populations of Westslope cutthroat trout are being secured through habitat improvement projects, there is no evidence that all remaining populations are secure at this current time and provides no assurance that these habitat improvement projects will continue to be implemented without a Species of Conservation Concern determination. It is critical that the Forest Service take the current conditions and remaining subpopulation security of Westslope cutthroat trout and Yellowstone cutthroat trout into consideration when concluding that these two species are not eligible as a Species of Conservation Concern. Both species are socially and systematically valuable to the Custer Gallatin National Forest.

Aquatic Invasive Species

Overview:

The Proposed Action establishes desired conditions, standards, and objectives for watershed and aquatics at the forest-wide planning level. Aquatic Invasive Species (AIS) may reduce the amount of water delivery, increase water temperatures during critical periods, and reduce spatial connectivity. However, the Proposed Action should include additional actions to address AIS. The proposed management approaches and possible actions section defer management approaches for AIS to the Guide to Preventing Aquatic Invasive Species Transport by Wildland Fire Operations (GPAIS) (Invasive Species Subcommittee of the Equipment Technology Committee/National Wildfire Coordination Group, 2017). Because of the threats stemming from AIS, NPCA urges continued compliance with the GPAIS.

Recommendations:

AIS Spread Control: The final plan should acknowledge all methods and opportunities for mitigating the spread of AIS. This could be accomplished by incorporating standards and guidelines for all watersheds within the planning area that aim to prevent the introduction of AIS from transportation channels, and prevent AIS from spreading into critical stream reaches, especially those with native salmonids present including Westslope cutthroat trout, Yellowstone cutthroat trout, and native aquatic invertebrates.

NPCA would also like to see additional preventative measures outlined in the final plan to mitigate for the possibility of AIS from a range of forest uses, including wildland fire operations and recreational and motorized use across the planning area. In addition, NPCA recommends a rapid response strategy for quick management action if AIS is detected when not related to wildland fire operations. In addition, expanded educational materials should be available to the public across the planning area, in a variety of means and languages, to reduce unintentional trans-watershed spread of AIS.

Adaptive Management: The final plan should also include adaptive management commitments to address AIS across the forest. For example, if AIS are detected on a stream reach with close proximity to, or with the potential to reach, native salmonids, the CGNF should list that stream reach as a priority watershed to ensure the appropriate resources are directed at minimizing potential harm to the critical watershed or subwatershed. We also suggest that if any new stream in the planning area presents Westslope or Yellowstone cutthroat trout populations, then it is identified as a high priority aquatic resource.

Continued Collaboration: NPCA supports continued collaboration with other state and federal agencies and non-government organizations, as well as multi-agency management plans such as the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (MFWP, 2007), to protect and enhance native cutthroat trout habitat. Working across agency borders will ensure habitat-wide protection for Westslope and Yellowstone cutthroat trout habitat, as well as habitat for other sensitive aquatic species such as fluvial Arctic Grayling. In addition to holding each party accountable, working across agency borders has proven to increase communication throughout the broader landscape, promoting a more cohesive habitat for all species.

Lynx

Overview:

Lynx are currently managed on the CGNF via the Northern Rockies Lynx Management Direction (2007) (NRLMD). The Proposed Action contains goals, standards, and guidelines for managing lynx on national forest land. We understand that if the NRLMD plan changes or lynx management changes as a result of recovery guidelines or other developments, then plan components could change through amendments. The Proposed Action currently recognizes lynx habitat as outlined in the NRLMD, although the NRLMD states that if and when lynx occupy formerly unoccupied habitat on national forests, the NRLMD will then be applied to those occupied areas:

“When National Forests are designing management actions in unoccupied mapped lynx habitat they should consider the lynx direction, especially the direction regarding linkage habitat. If and when those National Forest System lands become occupied, based upon criteria and evidence described in the Conservation Agreement, the direction shall then be applied to those forests. If a conflict exists between this management direction and an existing plan, the more restrictive direction will apply.”

Recommendations:

We commend the Forest Service for outlining lynx management and committing to the NRLMD assurance that identified new lynx habitat will be managed by NRLMD standards. However, we are concerned that the Proposed Action does not also include an assessment of current snowshoe hare habitat, or outline strategies for managing snowshoe hare habitat as part of a broader strategy to manage lynx on the forest. Snowshoe hare are lynx main prey, and there is a strong correlation between these species' habitat. We recommend that the Forest Service uses information on snowshoe hare range, habitat condition, and density to help guide management of potential current and future lynx habitat, beyond what is provided for in the NRLMD. Including an assessment of snowshoe hare habitat in the final plan is also important given the lack of clear understanding on the benefits and negative impacts of prescribed burns on snowshoe hare habitat. In addition to a forest-wide habitat assessment, has the Forest Service reviewed data on these benefits and impacts? We recommend an assessment of the positive and negative impacts to snowshoe hare habitat, to ensure future burns do not harm, or are targeted in areas where burns could benefit, snowshoe hares—and by proxy, lynx. Further, an additional desired condition could state that if future research demonstrates a clear correlation between the impact of prescribed burns on snowshoe hare habitat, then the plan will be updated to reflect best practices of prescribed burns in snowshoe hare habitat. In addition, given the strong association between snowshoe hare habitat and the presence of lynx, we recommend the Forest Service adopt a desired condition that if habitat maps change or research shows a change in snowshoe hare habitat due to climate change or other factors, then the final plan and associated management strategies will be updated to apply to new identified habitat.

Wolverine

Overview:

The wolverine is the largest member of the weasel family, and thrives in cold, high elevation alpine habitat. Wolverine in the CGNF naturally occur at low densities, as their habitat is patchily distributed across the plan area. Their persistence in this naturally fragmented habitat may be dependent on the dispersal of individuals amongst habitat islands to facilitate gene flow between subpopulations. The Proposed Action includes a desired condition that blocks of optimal wolverine habitat are available, both in areas where wolverine are currently found and in areas that may become future habitat refugia in the face of climate change.

Recommendations:

While we appreciate that the Forest Service addresses wolverine habitat in the Proposed Action, the final plan could go further to acknowledge current uncertainty around the impact that human activity has on wolverine dispersal. A potential new desired condition could state that large, undisturbed blocks of forest and alpine habitat characterized by persistent snow cover and cooler temperatures are present to provide high quality reproductive habitat and denning and foraging opportunities for wolverines. High elevation habitat and associated micro-climates will provide refugia for wolverines in the face of climate change. In addition, the CGNF should take a more precautionary approach to wolverines in regard to winter use, until best available science can demonstrate the response of denning female wolverines to winter recreation. To this end, another

desired condition could state that areas of habitat suitable for denning are prioritized based on suitable habitat and opportunity for connectivity to other habitat in the CGNF and other forests.

Ungulates

Overview:

While there is no specific mention of ungulates, ungulate habitat, or ungulate habitat management in the plan, several species of ungulates are found in the CGNF, many of which move from Yellowstone to reach habitat or forage in the CGNF. Despite the absence of a component dedicated to managing ungulate habitat within the CGNF, we appreciate that the Proposed Action includes a desired condition to ensure that except in specific instances, bison management actions should not create barriers for wide-ranging species, including ungulates. In addition, the Proposed Action includes a desired condition that new fences and reconstructed existing fences should prevent barriers to wildlife movement.

Recommendations:

To facilitate long-term ungulate dispersal and support successful migration across the forest, we recommend the Forest service include a desired condition to remove unused fences across the forest. In addition, has the Forest Service considered committing to a standardized guideline for wildlife-friendly fences when constructing or modifying fences? We also recommend that new or modified fences are constructed using the Montana Fish, Wildlife, and Parks guide: “A Landowner’s Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind” (Second Edition, 2012) to ensure consistency across the region and ensure that new or modified fences facilitate ungulate movement.

Grizzly Bear

Overview:

The Proposed Action formally adopts habitat standards from the Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem into the Custer Gallatin Forest Plan (Conservation Strategy). Desired conditions and guidelines for grizzlies focus on habitat inside the Primary Conservation Area (PCA), as outlined in the Conservation Strategy. While we understand the importance of coordinating with and referring to external management plans when managing for grizzly habitat inside the forest, the Proposed Action can and should go further than the Conservation Strategy. It is important that local forest and land managers utilize the best available science and manage grizzly bears in the most conservative way possible. While the Conservation Strategy is a good baseline, the final plan should take greater steps to manage the forest to conserve grizzly bears. The CGNF manages land that is important for the connectivity of the Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) populations. The CGNF should evaluate and implement management that promotes the movement of bears between the Greater Yellowstone Ecosystem (GYE) and the Northern Continental Divide Ecosystem (NCDE), not only in the connectivity areas that land managers think that bears should move, but in the connectivity areas that bears are currently utilizing. The CGNF can promote connectivity by evaluating opportunities to

improve habitat security, reduce bear mortality, reduce human-bear conflict and reduce the impact that highways have on grizzly bear movement. NPCA recommends that the CGNF coordinate with the Helena-Lewis and Clark and the Beaverhead Deerlodge National Forests to ensure that there is consistent management throughout existing and potential migration corridors.

Recommendations:

Identify Potential/Priority Locations for Highway Crossings: In areas where the CGNF or other federal land managers manage land on both sides of an interstate or highway, studies should be undertaken in conjunction with Montana Department of Transportation (MDT) to identify the best locations for crossing structures. These highway crossings should be built to allow for grizzly bear passage and include approach habitat management standards to make it as easy and safe as possible for grizzlies to utilize the crossing structures.

Bear Attractants: The CGNF is necessary for the dispersal of grizzly bears across the GYE and should be managed in a way that facilitates connectivity. While the Proposed Action includes a standard that “[f]ood storage structures and management must be in place and all other factors resulting in potential detrimental impacts to grizzly bears will be mitigated as identified for developed sites other than temporary work camps,” the final plan should incorporate more robust food storage requirements. Insufficient food storage protocol could result in increased bear-human conflicts, particularly in areas where forest users are not used to or expecting bears. One of the best ways to prevent grizzly bear/human conflict is to require the storage of any bear attractants in a secure way, which prevents grizzly bears from becoming habituated to humans and to potentially hazardous attractants. The CGNF should include attractant storage orders in the final plan for all areas within current or potential future grizzly habitat.

Habitat Replacement: The Proposed Action outlines guidelines for mitigating for permanent changes in secure habitat from roads, trails, and other developed features. Many guidelines require replacing habitat in the same subunit to account for lost habitat as a result of these features. The Proposed Action provides that replacement habitat must be in place before project implementation. Guidelines also outline requirements that replacement habitat must be in place for ten years before it can be replaced. However, these guidelines do not limit the number of projects that can occur within a single subunit during a calendar year, and therefore do not limit the amount of habitat displacement or human disturbance within a subunit within a specific timeframe. The Forest Service should consider a guideline that replacement projects within a subunit are limited on a calendar basis, to ensure long-term habitat stability for grizzlies. Within the Proposed Action, there are no standards for habitat outside of the PCA, but the plan recognizes that bears move outside of the PCA to reach critical habitat and move across the broader ecosystem to reach bears in other regions and in other forests. The final plan should expand standards and guidelines to apply to all current and potential future habitat, inside and beyond the PCA, including habitat corridors to connect bears to other habitat, such as the High Divide, Gravelley, and Madison Ranges. Establishing management guidelines for grizzly habitat across the forest will become critical as ecological disturbance and habitat alteration as a result of climate change, human activity, or other factors force bears to move into habitat beyond the PCA. The Forest Service should also include guidelines and standards that if the Conservation Strategy updates the PCA boundaries to reflect changes in grizzly habitat and movement, the

plan will apply management to these new areas. By outlining and managing potential future grizzly habitat in the plan, using current bear movement data and models of predicted habitat, the plan can successfully designate, manage for, and ensure habitat for grizzlies over the long-term.

Whitebark Pine

Overview:

Whitebark pine is considered an at-risk species based on the 2012 planning rule criteria, since being identified as a candidate for listing under Endangered Species Act. Whitebark pine is a critical food source for grizzly bears and an array of other species, and plays an important role in the forest ecosystem services.

Recommendations:

While we commend the Forest Service for including a desired condition to support the recovery and persistence of whitebark pine, this plan should go further to ensure long-term protection and restoration of this keystone species. The Forest Service should consider an additional desired condition that whitebark pine is present in the Grizzly Bear Conservation Strategy PCA, as well as potential future grizzly bear habitat, and is restored where not present but historically located across the forest system.

General Connectivity

Overview:

Connectivity is not a plan component; however, this planning process is an opportunity for the Forest Service to preserve habitat corridors across the forest, including corridors that cross interstates or highways. In addition, connectivity is required as part of the 2012 Planning Rule. The Rule states:

“The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity (§(219.8(a)(1)).”

Roads, and their associated traffic, are known to affect wildlife connectivity, distribution and abundance. Some wildlife, including grizzly bears and wolverine, avoid roads. These species’ populations can be reduced through loss of effective habitat. Protecting these habitat corridors now is crucial for future connectivity, even if highways are a current barrier.

Recommendations:

To this end, we suggest the Forest Service takes a “wildlife first” approach to management and activities on either side of US 191 and Interstate 90. The Forest Service has an important opportunity to plan now for potential crossing in the future. These roadways currently bisect habitat corridors for grizzly and wolverine, as well as migratory ungulates—all of which would benefit from habitat connectivity measures in these locations. Taking a “wildlife first” approach

would ensure that, when crossing opportunities arise, there is suitable habitat to connect wilderness, other national forests and public lands, and accessible routes between habitats and ecosystems. Areas to prioritize include the Cabin Creek Wildlife Management Area, and Porcupine-Buffalo Horn Wilderness Study Area. Further, an additional desired condition could state that if habitat connectivity maps change or research shows a change in habitat corridors due to climate change, then the plan and associated management strategies will be updated.

In addition, we suggest the CGNF works with MDT on road projects bisecting seasonal migration corridors for big game species on the CGNF to reduce or mitigate wildlife-vehicle collisions and facilitate connectivity between seasonal habitats. Future partnerships with MDT could facilitate improved connectivity across highways and interstates. The Forest Service should plan for these corridors now, to preserve them for future multi-partner efforts.

Recreation

Overview:

The Proposed Action describes recreation types, areas, restrictions, and opportunities across the forest. The plan outlines multiple types of recreation, from primitive to rural, as well as summer and winter uses for each recreation type, including areas where motorized recreation is permitted and not permitted.

Recommendations:

Condensed Use: While the plan recognizes the anticipated increase in recreation on the forest in coming years based on current trends, the plan does not provide sufficient guidelines for managing increased use across the forest. NPCA is concerned about the idea that “if you build it they will come.” While an existing desired condition provides that developed recreation corridors containing multiple facilities will keep visitor use concentrated rather than shifting development to other areas, this condition could be expanded to state that new recreation development or facilities will be prioritized in areas with existing facilities, to reduce recreation sprawl across the forest system.

Wildlife-First: The Forest Service should also update the recreation component to provide for recreation opportunities for all user types while protecting other forest uses and resources from the impacts of increased recreation. As the forest sees an increase in the volume of recreation, changes in visitor demographics, and changes in types of recreation, recreation management should continue to prioritize wildlife, habitat, and resources. We cannot anticipate now what future recreation demands will be placed on the forest, or how recreation will change over time, and this plan could be in place for decades. Ensuring a “wildlife-first” approach in the plan will protect wildlife and resources for the life of this plan, regardless of how recreation changes as a result of technology, shifting values, and changes in recreation numbers.

Planning for future recreation on the Custer Gallatin can be improved in a number of ways. A current desired condition, FW-DC-REC-04, should be updated to say that “Existing developed facilities, roads, and trails for both summer and winter recreation activities are adaptable for new recreation demands *in ways that does not interfere with wildlife and habitat.*” This change and

others like it will ensure that wildlife and habitat remain protected as use changes across the forest over time.

Safety: With increased recreation and changes in visitation, safety becomes increasingly important. Recreation and use changes put forest users and wildlife at risk if they aren't managed in a coordinated manner. Has the Forest Service considered referring to Yellowstone National Park's 2016 Visitor Use Study (Yellowstone National Park Visitor Use Study, 2017), and Transportation Study (Transportation and Vehicle Mobility Study, 2017), to assess current changes and trends in Yellowstone visitation? This information could help predict likely changes in forest visitation and recreation. Using this information as a guide, the Forest Service can ensure public safety. For example, international visitors comprised of 17% of park visitors during the study period. Of those visitors, 49% came from Europe, 34% came from China, and 10% came from Canada. In addition, the West entrance saw the most traffic, and one of the highest use by international visitor access. Many of these park visitors either stayed in or passed through the CGNF on their way to Yellowstone.

From this, it can be reasonably inferred that visitor demographics in the CGNF are changing, likely in ways that align with changing visitation demographics in Yellowstone National Park. The CGNF can use this information to proactively manage for changes in recreation demographics. For example, installing signs in the languages of expected visitors will improve communication regarding wildlife, safety hazards, and resource protection. In addition, CGNF should consider updating signage at main facilities or popular trailheads to accommodate deaf and blind visitors, to ensure the safety of differently abled forest visitors.

Timber

Overview: Timber management is one of multiple uses provided for in forest planning, and if done in a conservation based approach could contribute to ecological restoration efforts, fire management, economic sustainability of the forest, and protection of municipal water supplies. While NPCA recognizes the historic and important role of timber management across the U.S. Forest System, we encourage the Forest Service to manage timber in such a way that does not interfere with wildlife, habitat corridors, and other resources.

Recommendations:

The Proposed Action provides a desired condition that no clearcutting will occur in habitat corridors, or in critical winter habitat. This desired condition could be expanded upon with further research to identify which species are most sensitive to clear-cutting, and the times of year that species are most impacted by timber activities. More research could also outline climate refugia areas across the forest and ensure limited timber harvest in these areas, to ensure long-term availability of habitat for wildlife as climate change causes ecosystems and habitats to shift.

Another desired condition could ensure no clearcutting, timber harvesting, new logging roads, or other timber-related impacts near Yellowstone. Activities beyond park borders can have significant and lasting impacts on park wildlife and resources. Where possible, the Forest Service

should consider alternative clearing methods, such as prescribed burns, in areas near Yellowstone.

Mineral Development

Overview:

Mineral development is another of the multiple uses that the Forest Service manages on Forest Service lands. Though mineral development is recognized as a multiple use on Forest Service lands, Section §219.8 of National Forest System Land Management Planning instructs the responsible official take into account multiple uses that contribute to the local, regional and national economies in a sustainable manner.

Recommendations:

The final plan should identify the 30,370 acres of land identified in the ongoing Forest Service Emigrant and Crevice Mountain Potential Mineral Withdrawal as “special emphasis” as the Forest Service has done in the past for other recreation areas, watersheds, and geographically defined areas of unique value and concern. With this identification should come the development and adoption of standards and guidelines that provide direction for managing these lands to represent the scenic integrity, important wildlife corridors, and high recreation values that the Forest Service has identified within the current mineral withdrawal review.

Climate Change

Overview:

The Proposed Action does not include a climate change component. Instead, it outlines opportunities for mitigating for climate change throughout the plan. However, more attention should be paid to potential impacts of climate change, including warming waters, habitat refugia, migration corridors, and shifting ecosystems. The importance of habitat corridors throughout the CGNF must be a consideration in facilitating wildlife dispersal in response to a changing climate. Climate change affects ecosystems, habitat, and wildlife populations by exacerbating the negative effects of habitat loss, degradation, and fragmentation, as well as fire patterns, drought and floods, precipitation, and temperature patterns. To survive these impacts, many species will need to adjust location and access new habitat ranges and different plant and terrestrial dynamics across the ecosystem. Therefore, maintaining landscape connectivity is essential to protecting biodiversity in the face of climate change.

Recommendations:

The impact of climate change on forests, ecosystem services, and biodiversity is well researched. The final plan should recognize the need to adapt to and mitigate current and anticipated future effects of climate change and identify and protect ecological connectivity for plants and animals and build resiliency on the landscape.

To this end, NPCA suggests the addition of a climate change plan component, to give appropriate acknowledgement of this forest impact and outline forest-wide strategies to adapt to

and mitigate climate change impacts. The Forest Service should do more to incorporate data on warming trends and the impact of these models on habitat, riparian habitat, fire regimes, and other factors into the final plan. In addition, areas of potential impact or areas of potential refuge should be prioritized throughout the plan. Similarly, if habitat models change or research shows a change in habitat needs due to climate change, then the plan should be modified, with updated habitat and dispersal maps for species found on the forest to facilitate dispersal between subpopulations. In addition, recognizing the influx of research on climate change impacts and future trends, this section of the plan should be routinely updated with current best available science.

Conclusion

NPCA supports many of the elements incorporated into the Proposed Action. However, we hope that you will consider the information that we have provided and analyze the concerns we raised in the final plan. Thank you very much for the opportunity to comment on the Proposed Action. We look forward to future involvement in the forest planning process. Please feel free to contact us with any questions or clarifications.

Best Regards,

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CC:

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