

## Custer Gallatin Comments on Draft Forest Plan:

Dear Forest Planning Team,

Please accept my comments on your draft forest plan for the Custer Gallatin National Forest. I would like to include my initial comments and attachments to this comment and as reference.

I have lived in Montana for over 30 years. Much of that time was spent in Big Sky and Bozeman, so I am familiar with the area and have spent many hours hiking and biking in the Custer and Gallatin National Forests. It is a stunning place that should be highly protected and preserved as a resource for wilderness, wildlife habitat, wildlife linkage corridors, carbon storage, and clean water. With global warming looming, we must make sacrifices to preserve what pristine wild places remain on our landscape.

I support Alternative D because it features the most recommended Wilderness in the Custer Gallatin Forest. However, it does not go far enough. I recommend a total of 230,000 acres of recommended Wilderness in the Gallatin Range and even designating all Inventoried Roadless Areas as Wilderness would still be lacking in the light of global warming. It is time to make bold moves to protect our world and this forest plan could be the beginning of great change if land managers in the Custer Gallatin have foresight.

I understand that there is substantial political pressure to supersede science with measures that would increase recreation, logging, mining, grazing and drilling on our public lands. The forest service must be immune to political pressures. The best available science should be used to manage the forest, not fear, not political pressure, not budgetary pressures, nor powerful lobbyists. The forest service is obligated to use the best available science to preserve the land and the wildlife that have no voice or political might.

I am concerned that the Gallatin Forest Partnership (GFP) has been given an inordinate amount of importance in this planning process. Please do not mistake hand-picked collaborative groups with collaboration. The GFP is stacked with mountain bike representatives. Mountain bikes comprise only 34% of bike sales in the US and bike sales in the US are merely 2.2 percent of GDP. Since the forests are owned by the entire US population, it seems this “collaborative” is far from representative. Please do not put too much power into the hands of 15 people. They do not represent nor do they speak for the public that owns these lands.

### **Wilderness**

I go into more detail in my scoping comments (pg.3-6) but will list the areas that should be recommended as Wilderness in the Custer Gallatin Forest. Alternative D is the closest to the ideal, but should also include a full 230,000 acres of recommended Wilderness

1. The high elevation rock and ice corridor that the FS has recommended as Wilderness

2. The entire Hyalite Porcupine and Buffalo Wilderness Study Area which is an essential elk migration route
3. South Cottonwood, Hidden Lakes and West Pine in the Gallatin
4. Drainages connected to existing Wilderness in the Absaroka-Beartooths including Line Creek, West Fork/Lake Fork of Rock Creek, Mill Creek, East Rosebud, and Main Fork Rock Creek.
5. The area south of the Taylor Hilgard Wilderness in the Madison range
6. Near the Lee Metcalf, Cowboy's Heaven
7. 23,000 acres in the Lionhead as recommended in the past forest plan.
8. In the Pryors: Big Pryor Mountain 12,737 acres, Punchbowl 7766 acres, Lost Water Canyon 12,992 acres and Bear Canyon 10,366 acres
9. In the Bridgers, please recommend the roadless areas near Blacktail Peak and North Cottonwood.
10. Polygons 36 and 37 and the roadless area in between in the Crazy Mountains
11. I believe it would behoove the forest service to recommend all roadless areas in the Custer Gallatin Forest as Wilderness.

Certainly, a cabin or other small structures should not degrade an area so important to wildlife, our clean water supply, and carbon sequestration. Please be generous and recommend as much as possible as Wilderness. If you do it will be the most far sighted Forest Plan of this decade.

It is time to resist pressure from timber, mining and recreation and preserve our lives by preserving our ecosystem. According to the recent report by the UN on species, "Negative trends in nature will continue to 2050 and beyond in all of the policy scenarios explored in the Report, except those that include transformative change – due to the projected impacts of increasing land-use change, exploitation of organisms and climate change, although with significant differences between regions. (see attachment 1) Please let the Custer Gallatin Forest Plan be a part of "transformative change."

According to the recent UN report (see attachment 1), "Nature plays a critical role in providing food and feed, energy, medicines and genetic resources and a variety of materials fundamental for people's physical well-being and for maintaining culture." Please be a part of the solution not the problem by recommending all of the Custer Gallatin National Forests Roadless areas for Wilderness.

## **Wilderness Protections**

The Wilderness Plan was appended to the most recent forest plan, so when the new plan is approved, it will disappear. Two things should be done in the current plan to assure protections for Wilderness and Recommended Wilderness.

First, the Wilderness protections within the Forest Plan need to be more vigorous in language, more specific and enforceable. It should provide clear and measurable standards to protect, track and mitigate changes in Wilderness character. The draft plan does not go far enough. It must include enforceable standards to assure Wilderness character in these precious places.

1. Chainsaws should never be allowed in Wilderness or Recommended Wilderness except in the circumstance of possible loss of life.
2. A standard that prohibits all forms of mechanized transport including mountain bikes from Wilderness and Recommended Wilderness should be included in the plan and this must be enforced to prevent further degradation of Wilderness character.
3. Zone 1 Wilderness designation needs a standard that does not allow any system trails. This is the most pristine zone and should be protected at the highest level.
4. The “backcountry areas” designation, a large compromise for a small group of recreationists, does not have sufficient protections for habitat. It is not a suitable substitute for Wilderness. The “backcountry area” designation promotes recreation not ecosystem preservation.
5. The draft plan has little direction for administering the Absaroka-Beartooth and Lee Metcalf Wildernesses. The current wilderness management plan allows destructively large groups of up to 25 head of stock (horses and mules) and 15 people in most areas. Research shows that impacts increase significantly when group-sizes exceed eight head of stock and 12 people. The Forest Service should reduce group size limits accordingly.
6. The forest plan should put an end to ecologically destructive fish stocking in naturally fishless wilderness lakes. This practice significantly alters natural conditions.
7. The plan must also address the issue of human and pack animal feces which contaminate lakes and streams on the Beartooth Plateau in the Absaroka-Beartooth Wilderness.

Second, a robust Wilderness Plan should be revised concurrently with the Forest Plan or should be completed within 2 years and this should be stated in the Forest Plan as an enforceable standard. This will preserve and protect existing and recommended Wilderness.

### **Native American Heritage**

There are sacred areas in the Crazy Mountains, the Pryors and the Beartooths. These areas should be preserved. No mining or the building of any new roads should be allowed. No new recreation sites should be allowed. A standard should be created that guarantees the preservation of these sacred areas and respects the heritage of Native Americans.

The Custer Gallatin National Forest must fulfill its responsibilities and trust obligations that safeguard treaty rights, sacred species, sacred sites, and traditional cultural places of significance to native peoples.

### **Endangered Species and Species of Concern (Dieterich comments pg 8)**

1. Steps should be in place in the forest plan that re-establish a self-sustaining bison population in the Custer Gallatin Forest as is stated in Alternative D. Bison should be listed as a Species of Conservation Concern by the forest and strong protections should be in place in this forest plan.
2. The grizzly is not only an icon of our Montana heritage, it is also currently protected under ESA. This forest plan should reflect that with robust standards to protect grizzlies and their habitat including minimal roads using the moving prism method of calculation. I would recommend .5 miles/square mile. All corridors creating connection to the Bitterroot Ecosystem and eventually the Northern Continental Divide Ecosystem and Canada should be preserved at the highest standard allowable. Standards should be established in the plan that would minimize grizzly/human conflict including food storage requirements, road and trail closures and the reduction or elimination of mountain bike trails in grizzly habitat. As a former member of the IGBC Chris Servheen states, mountain biking is “a recreational activity that involves increased risk and danger of surprise encounters with bear.” (see attachment 2). Mountain bikes do not have a place in grizzly habitat. Studies have also shown that animals are startled by bikes and avoid trail areas further reducing habitat.
3. Enforceable forest-wide amendments should be included to protect key linkage areas, habitat connectivity and food security for grizzlies.
4. A forest wide standard should be included that restores habitat connectivity for bison, allows them to roam freely, and preserves their viability.
5. A standard should close and not permit cattle grazing allotments in American bison range.
6. A standard should be adopted to keep domestic sheep grazing out of bighorn sheep range to protect the viability of native bighorn sheep populations.
7. A forest wide standard should be created that requires “let-down” fencing and removes barriers that impede migration of native species.
8. The plan should include a blueprint for restoring wetlands, creek banks and pond edges.

**Grazing** (Dieterich comments pg 8)

1. As allotments are vacated, they should be closed or modified.
2. The Lion Creek allotment used to be grazed by steers-only as the permittee, Hank Rate understood the potential for disease transmission even though it was a remote consequence. He has since relinquished his permit, and this allotment should be withdrawn.

3. On-dates of active allotments should be changed to July 15 in recognition of disease transmission as a seasonal manifestation. The probability of transmission from elk is very likely to increase over the years and unless a more effective cattle vaccine is developed, the possibility of all public land grazing being terminated is very real and should be mentioned in the Plan Revision.

### **Reduce Road Densities** (Dieterich comments pg 6)

A policy that focuses on creating a minimum sustainable future road system should be included in the plan revision. Please consider the 5.2-billion-dollar backlog in road maintenance (see FS-905) and budgetary constraints, as well as directives in the Forest Lands Management Act and the 2012 Planning Document.

Consider using standards in Amendment 19 in the previous Flathead Forest Plan. Please also use the moving prism method for measuring road densities for a more accurate assessment of road densities.

### **Climate Change**

Preserving the most possible areas for Wilderness designation will protect carbon sequestration on the forest and reduce intense wildfires. Climate change also intensifies the adverse impacts of roads on the landscape, reducing road densities will mitigate this affect. Landscape connectivity is also more necessary due to climate change.

### **Old Growth** (Dieterich comments pg 9)

A specific protection for old growth forests and old trees should be in place in the forest plan for any restoration project or alteration of the forest of any kind. Old growth forests and old trees are vital to wildlife and the natural processes of the forest ecosystem. They should be left untouched. Even diseased old trees should be left to become snags and vital habitat. These trees should be defined as over 120 years old and should be documented and inventoried on the forest for future protection. Andrew Larsen of University of Montana Forestry department recommends leaving all old trees in any forest restoration project. They cannot be replaced. Once they are gone, they are gone. They must be considered a vital part of the forest and an endangered part of the forest to be cherished and protected.

I hope that you consider these comments and create a groundbreaking vision for forest planning in our changing climate. Only strict standards and forest protections will preserve our planet, our lives and the lives of our children and grandchildren.

