



June 6, 2019

Custer Gallatin National Forest  
Attn: Forest Plan Revision Team  
P.O. Box 130 (10 E Babcock Ave)  
Bozeman, MT 59771  
cgplanrevision@fs.fed.us

Re: Comments on the Custer Gallatin National Forest DEIS and Draft Plan

Dear Virginia and Members of the Forest Plan Revision Team:

American Rivers<sup>1</sup> would like to thank you for the opportunity to submit comments on the Custer Gallatin National Forest's Draft Environmental Impact Statement (DEIS) and Draft Forest Plan. These comments are the most recent in a series of comments that we have submitted to the Forest on March 5, 2018; August 11, 2017; February 27, 2017; and November 2, 2016; as well as comments submitted by the Gallatin Forest Partnership, in which American Rivers is a founding member. The scope of our comments will cover stream resources on the Forest as well as the full range of management topics in the Gallatin Forest Partnership's agreement covering the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (WSA), the greater Gallatin Range and a portion of the Madison Range.

### **Wild and Scenic Rivers on the Forest**

We would like to thank the Forest for maintaining its Wild and Scenic eligibility determinations for 31 stream reaches in its DEIS and Draft Plan. We strongly support all 31 of these streams as eligible for designation under the Wild and Scenic Rivers Act, and ask that the Forest add the streams detailed below to this list as well.

In addition to the 31 streams found eligible in the DEIS and Draft Plan, we request that the Forest add the following five Wild and Scenic eligible streams to its eligibility inventory and Final Environmental Impact Statement (FEIS). They are all free-flowing, possess at least one Outstandingly Remarkable Value (ORV)<sup>2</sup>, and are conservation

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<sup>1</sup> American Rivers is a national nonprofit conservation organization which protects wild rivers, restores damaged and degraded rivers, and conserves clean water for people and nature. Since 1973, American Rivers has protected and restored more than 150,000 miles of rivers through advocacy efforts, on-the-ground projects, and our annual America's Most Endangered Rivers® campaign, most recently including Wild and Scenic East Rosebud Creek, Montana's first new Wild and Scenic River in 42 years. We have over 275,000 members and supporters throughout the country, including over 3000 members in Montana who care deeply for the rivers running through the Custer Gallatin National Forest. Our offices in Montana are located in Bozeman and Victor. American Rivers is a founding member of both Montanans for Healthy Rivers (MHR), whose goal is to permanently protect western Montana's best remaining free-flowing rivers; and the Gallatin Forest Partnership (GFP), a place-based partnership composed of a broad group of stakeholders which submitted a balanced set of consensus recommendations addressing pervasive conflicts in the Gallatin and Madison ranges.

<sup>2</sup> Rare, unique or exemplary within the region of comparison.

priorities for American Rivers and MHR. The Taylor Fork River in particular stands out as qualifying as eligible under the Wild and Scenic Rivers Act, and continues to be a glaring omission in the Forest's eligibility inventory. It is free-flowing, and possesses exemplary scenery, fisheries, wildlife and recreation ORVs.

We are also excited by the designation of East Rosebud Creek as Montana's first new Wild and Scenic River in 42 years, and we look forward to working with the CGNF on the creation of a Comprehensive River Management Plan (CRMP) in the next three years. We ask the Forest to create and publish a proposed timeline for creation of the CRMP, and state a goal for when it aims to have the plan completed.

The following list details Wild and Scenic eligible streams that we request the Forest add to its inventory in the FEIS. All arguments are made within the CGNF's Region of Comparison for each ORV, using criteria used by the U.S. Forest Service within Region 1 and/or nationally:

1. Buffalo Creek, Absaroka Mountains - Home to a thriving population of native Yellowstone cutthroat trout, a Forest Service "sensitive species", the scenic, undeveloped Buffalo Creek valley is one of few such valleys of considerable size north of Yellowstone National Park. This lower-elevation, core wildlife habitat supports an important wildlife migration corridor and is important to the long-term ecological integrity of the unique Greater Yellowstone Ecosystem (GYE).

ORVs:

- Fisheries - Yellowstone cutthroat trout, and angling via hiking and horsepacking
- Scenery - large, wild, roadless, lower-elevation valley in the Absarokas
- Wildlife - migration corridor and core habitat

2. Hellroaring Creek, Absaroka Mountains – Hellroaring Creek is a rare stronghold for genetically-pure, native Yellowstone cutthroat trout. The creek is also home to an exemplary, remote and challenging whitewater paddling trip through spectacular scenery, with Class IV-V whitewater that is one of the best in the region. Unique bedrock falls and cascades punctuate meadow systems, forest, and vistas of high peaks. Situated north of Yellowstone National Park, the Hellroaring Valley is home to a diverse array of wildlife species including elk, moose, gray wolves, wolverines and grizzly bears. Like Buffalo Creek, this valley is integral to the ecological integrity of the GYE.

ORVs:

- Fisheries – Yellowstone cutthroat trout stronghold, multi-day backcountry angling
- Recreation – expedition whitewater paddling and packrafting, horsepacking
- Wildlife - core habitat and migration corridor

3. Porcupine Creek, Gallatin Range – Porcupine Creek drains the southern end of the Gallatin Range, and provides outstanding, diverse recreational opportunities in all seasons, including regionally exemplary mountain biking, hiking, hunting, cross-country skiing and horseback riding. The stream has also carved a large valley that provides critical winter range for elk in a Wildlife Management Area,

as well as important habitat and a migration corridor between Yellowstone National Park and the Gallatin and Madison ranges for wolves, wolverines, grizzly bears, mule deer and other species. The scenery is stunning, showcasing the Gallatin Range above a wildflower-studded valley in the spring.

ORVs:

- Recreation - biking, hiking, hunting, skiing and horsepacking
- Scenery - verdant valley framed by Gallatin and Madison ranges
- Wildlife - elk winter range and critical wildlife migration corridor

4. South Fork Madison River – The South Fork Madison River is home to a population of Westslope cutthroat trout, and is projected to provide cold water refugia for salmonids over the next 30 years. It is also unique in its healthy wetlands and riparian areas, featuring beaver dams and willow thickets which provide fish and wildlife habitat and connectivity for moose, grizzly bear, river otters and trout alike.

ORVs:

- Fisheries – Westslope cutthroat trout, cold water refugia for native fish in a world-renowned fishery, rare wetland ecosystem feeding the Madison River, climate resilience
- Wildlife - unique wetland habitat and connectivity corridor

5. Taylor Fork River, Madison Mountains - The headwaters of the Taylor Fork are home to one of the only native Westslope cutthroat trout fisheries in the Madison Range. The river is not only popular with horse-packers, hunters, anglers, backpackers and wildlife photographers, but also provides an exemplary, road accessible Class II-III packrafting and whitewater kayaking run through a beautiful valley, perfect for the beginning creek-boater and loaded with wildlife viewing opportunities. The stream flows over a colorful bed of stones with incredible clarity in late Summer. Home to the densest population of grizzly bears in the Lower 48 states, the Taylor Fork also supports robust ungulate and bird populations. There are few other places on the Forest that feel as wild and beautiful as the Taylor Fork Valley, whether in the road accessible lower reaches or the roadless upper reaches draining the stunning Taylor Peaks. If there is just one river to be added to the Forest's eligibility list for the FEIS, we would ask that it be the Taylor Fork.

ORVs:

- Fisheries – rare native fish stronghold for Gallatin River, cold water refugia, climate resilience
- Recreation – rare, easy creek boating and packrafting opportunity with a bike shuttle, hiking, wildlife viewing, hunting and angling
- Scenery – exemplary water clarity over multi-colored stones, immense peaks, verdant valley, wildlife
- Wildlife – important habitat, wildlife viewing and birding, migration and connectivity corridor, rare undeveloped riparian grizzly habitat. Wildlife habitat and connectivity is a river-dependent value, especially when taken within the context of the arid Intermountain West. Though less than 5% of Montana's landscape, rivers, streams and wetlands support more than 75% of Montana's

wildlife, fish and plant diversity. 89% of the species of greatest conservation concern are found in the riparian and wetland and community type, and are essentially associated with it.<sup>3</sup>

### **Mineral Withdrawal for Wild and Scenic Eligible Rivers**

American Rivers wholeheartedly supports the mineral language contained in Standard FW-STD-EWSR-01 on Page 127 of the Draft Plan, stating:

*Standard (FW-STD-EWSR) 01 Extraction of saleable mineral materials shall not be allowed.*

Under the Wild and Scenic Rivers Act, new sale and entry for mineral extraction is withdrawn in designated and eligible stream corridors classified as *wild*. We support the Forest extending this mineral withdrawal language to all classifications of designated and eligible Wild and Scenic Rivers. We believe that this is necessary to protect headwaters streams for people and wildlife, reflecting the cumulative effects of development surrounding the Forest and the best available science predicting a severely climate altered world.

### **Protective Designations in CGNF Plan Components**

We thank the Forest for its thoughtful use of protective designations in the Draft Plan and DEIS (particularly in Alternative D) in order to protect water quality, water quantity, wildlife habitat, fish and wildlife migration corridors, as well as to adapt to a changing climate and a warmer, drier world. In particular, we support Recommended Wilderness without nonconforming uses, maintenance and protection of Inventoried Roadless Areas, protection and restoration of Priority Watersheds in the Watershed Condition Framework, maintaining and enhancing Key Linkage Areas, and the protection of designated and eligible Wild and Scenic Rivers. For American Rivers, well-protected watersheds contribute essentially to healthy, sustainable, resilient, connected rivers, streams, creeks, lakes and wetlands.

We ask that the Forest ensure that there are sufficient plan components in the Hyalite Creek, Bozeman Creek and Shields River Priority Watersheds based upon the Watershed Condition Framework. In particular, we would like to see attention given to the importance of roadless and protected areas to watershed health within the Forest Plan, and components that detail the Forest's plans to restore and protect watersheds that are classified as "at risk."

### **Eight Stream Reaches, Classifications and ORVs Requiring Edits**

Based upon field observations and input from our partners, members and affiliates, we request that the Custer Gallatin National Forest make the following edits to its Wild and Scenic Eligibility Inventory in the FEIS:

1. Bear Creek, Pryor Mountains – Please extend the reach to include the full headwaters: 7.5 miles. Thank you for reclassifying the stream as "scenic" earlier, but

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<sup>3</sup> The Governor's Task Force for Riparian Protection, State of Montana, 2012.  
See: <http://water.montana.edu/riparian/>

please change it from “scenic” to “wild,” considering that it is currently only accessible by trail. The legacy “road” that appears to be within the river corridor is actually on the rim above, and recognizing the Forest’s standard that “A few existing roads leading to the boundary of the area are acceptable.” Add scenery, recreation, and cultural ORVs, recognizing the canyon’s exemplary, visually striking limestone character, incredible hiking and birding opportunities, and unique cultural importance.

2. Big Creek, Gallatin Mountains – Add recreation and scenery ORVs in order to acknowledge the exemplary hiking, hunting and horsepacking recreation along the creek, as well as the stunning limestone cliffs and water-carved canyon draining the Gallatin Range.

3. Cabin Creek, Madison Mountains – Please add recreation, scenery and geology ORVs in recognition of this popular trailhead, and rare, visually stunning “reef-like” scarp and fault zone, epicenter of the 1959 earthquake that created Quake Lake.

4. Crooked Creek, Pryor Mountains – Please reclassify as “wild.” The road that appears to be within the river corridor is actually on the rim above the stream, and does not provide access to it.

5. Lost Water Creek, Pryor Mountains – Classify the upper reach as “wild.” The noted faint, closed “roads” 2308g and 2308g2 do not appear in the travel plan and are neither system roads nor reserved for administrative use.

6. Slough Creek, Absaroka Mountains – Add recreation and wildlife ORVs in recognition of the importance of the drainage to horsepackers and hikers, as well as grizzly bears, wolverines and migrating deer and elk herds.

7. West Boulder River, Absaroka Mountains – Add fisheries and scenery ORVs in order to recognize the important trout fishery and regionally stunning setting that draws anglers from afar.

8. Yellowstone River, Absaroka, Sawtooth and Gallatin Mountains – Add a fisheries ORV to acknowledge that the free-flowing Yellowstone River provides core habitat and a critical fish migration corridor that connects every tributary in the upper watershed, both inside and outside of the park. It also draws anglers from around the world.

### **The Gallatin Forest Partnership Agreement**

We thank the Forest for making a good-faith effort to incorporate the GFP’s recommendations into management direction for the greater Gallatin Range in Alternative C of the Draft Plan. Please reference further comments submitted by the GFP - which American Rivers helped craft - in order to more faithfully represent the interests of the GFP’s many and diverse members and endorsers. The Forest got a lot of the agreement right in Alternative C, but mischaracterized, changed, or omitted some details contained in the GFP agreement. We trust that this was accidental, and reflects the difficulty of translating the tone, tenor and details of a community agreement into

goals, standards, guidelines, thresholds and management direction. As such, we ask that the Forest carefully read the GFP comments, and then attempt to fully replicate the agreement in the FEIS. If there are any questions of ambiguities contained in our GFP comments, please do not hesitate to reach out to any of the partners, including American Rivers.

As a founding partner in, and signatory to, the Gallatin Forest Partnership (GFP) Agreement, American Rivers wholeheartedly supports the recommendations made in therein. We believe that a more connected and better protected Gallatin Range and Madison Range will ensure healthier headwaters for the Yellowstone, Gallatin and Madison rivers, as well as secure source-water for the cities of the region and local agriculture. This broadly-supported, common-sense agreement is also the best chance that our community has to move past decades of conflict and to prepare our incomparable region for a more crowded, climate altered, and ecologically constrained future. Please insert the recommendations made by the GFP into management direction for the greater Gallatin Range in the FEIS and Record of Decision (ROD).

### **Conclusion**

Thank you for considering these recommendations. We hope that the Forest will take a hard look at the information that we have provided, while at the same time accepting our gratitude for including the 31 streams that it has already found to be Wild and Scenic eligible in the Proposed Action, and for a good faith effort at incorporating the GFP's Partnership Agreement in Alternative C in the DEIS and Draft Plan.

As always, we would be happy meet to discuss the edits and additions that are contained in this letter. We look forward to working with the CGNF during the creation of the Comprehensive River Management Plan (CRMP) for the recently designated Wild and Scenic East Rosebud Creek.

Sincerely,



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