

Re: DRAFT Revised Forest Plan and Draft EIS for the Custer Gallatin National Forest (CGNF)

Dear Custer Gallatin Forest Planning Team,

Thank you to the CGNF planning team for your considerable efforts to identify options for improving the plan for the CGNF. We support the current Alternative D, or some close version thereof that includes the highest level of conservation for the wildlife and wildlands of these very unique lands. Below we note our reasons for this, with a focus on the Madison, Henrys Lake, and Gallatin Mountains Geographic Area. In addition, we also provide select questions and comments relating to individual elements of the plan. We are interested in your response to them and hope that these will serve to improve the Custer-Gallatin Forest for current and future generations of wildlife and human visitors.

Alternative D provides the highest level of habitat protection for the multitude of native organisms and the processes they perform across the Forest's varied landscapes, when compared against Alternatives A, B, C, and E. Most natural communities are being degraded in the USA and around the planet due to threats from fragmentation, invasive species, conversion, mismanagement, overuse, exploitation, changing climatic conditions, and a host of other factors. Locally, this trend is expected to increase as more people move to the Bozeman area with consequent greater use of the CGNF resources. At the same time, the Greater Yellowstone Ecosystem serves as one of the largest remaining nearly intact temperate ecosystem in the world. This unique area is anchored on its northern boundary by the Madison, Henrys Lake, and Gallatin Mountains Geographic Area and its neighbor in the Absaroka-Beartooth Mountains. The National Forest lands furnish essential habitats that complement those in the Yellowstone Park core, serving as seasonal and permanent habitats for many wildlife species, while providing uncommon and unique habitats for others. In addition, these most northerly lands in the ecosystem, containing some of its highest mountains, have the potential to serve as critical future habitats and refugia for a wide range of organisms as the Earth's climate changes. **Hence, the lands in these Geographic Areas can best serve the natural heritage of this globally important ecosystem by containing an extensive, diverse mix of inter-connected wilderness areas encompassing all habitat types and elevations in this area.** Alternative D (or conditions close to it) allows us to say, as the current stewards of these resources, that we are doing all that we can to recover rare species, keep common species common, allow natural processes to continue, and provide future generations with a rich natural heritage that they too can enjoy and experience. For these reasons, we strongly encourage you to adopt Alternative D.

Should Alternative D fail to become the central goal of the Forest Plan in favor of an alternative closer to C, we would strongly recommend that the following areas be designated as Wilderness Areas to complement those currently under Alternative C:

- 1) **Cabin Creek North and South Wilderness Areas** (as shown in Alt. D) as they would help to connect the Lee Metcalf Wilderness Areas adjacent to Yellowstone NP, thus offsetting the extensive summer and winter motorized trail networks in the Cabin Creek Recreation and Wildlife Area.
- 2) **The Porcupine - Buffalo Horn** area, as these lands would provide valuable lower elevation valley and riparian habitat for Yellowstone wildlife species, while enhancing connectivity between Yellowstone NP and the Lee Metcalf WA.

As a last focal comment, the Draft EIS (3.21.4) mentions the following in regard to the extremely important Cabin Creek Recreation and Wildlife Management Area: "Recreation management allows for current uses as long as they do not adversely impact grizzly bears and big game, or create other unacceptable levels of resource damage." This statement is certainly well-intentioned and laudable, but the reality is that adverse impacts due to recreation management would be extremely difficult to determine in the absence of a dedicated study, especially for a rare species like grizzly bear, a purported focal species of this management area. Published research (Creel et al. 2002 Conservation Biology 16:809-814) showed a stress response to snowmobiles by wolves and elk, and it is likely that other species would likewise be impacted by recreation activities. **Given that it is unlikely that adverse impacts will be detected unless there is a dedicated study, we recommend that the prudent management approach would be to provide strong measures to limit recreation levels and ensure that recreation use does not increase over time.**

In addition to our recommendations noted above, we note the following questions and comments (and the associated section # of the Draft Forest Plan) for your consideration:

2.2	The last sentence of the vision statement speaks to the outstanding scenery, opportunities for solitude, and primitive recreation in the National Forest lands comprising the Greater Yellowstone Area. Nothing is mentioned about these lands providing critical native habitats that help to maintain the health, function, and resilience of the biodiversity of this highly significant Greater Yellowstone ecosystem. This seems like a gross omission and we would encourage some mention of this role in the vision statement.
2.3.1	Biodiversity is mentioned 11 times in the plan. In this section it is stated that "...", the intent of the plan components is to collectively provide for the full suite of native biodiversity across the Custer Gallatin." Overall, the plan focusses on plants (Plantae) and animals (Animalia), neglecting substantive mention of how the bulk of nature (Bacteria, Archaea, Protozoa, Chromista, and Fungi) are to be protected. If these are captured under "Biodiversity", then a) the definition of biodiversity in the Glossary should state this [or at least note the presence and importance of these organisms; the difficulty in identifying and tracking most of these species; and that by protecting more obvious plant and animal communities, along with water habitats, that it is hoped that these organisms will be protected too; and, b) the plan should reiterate the goal of protecting and enhancing the function and populations of all organisms in the NF. It is important to at least acknowledge the presence and importance of these organisms in the function and resilience of natural systems, and the need for forest managers to consider possible impacts to them when proposing actions in the forest.
2.3.9, 2.3.10	These two sections speak to protecting and enhancing habitats containing "at-risk-plant species" and the need to "maintain and enhance ecological integrity, diversity, function, and resiliency" of the Forest's vegetation communities. Given these goals, why not also provide protection / conservation efforts for Plant Associations and Ecological Systems that occur across the CGNF? Global and State rankings currently exist for these two vegetation classifications, and assuming that the information exists to map these areas, then it seems prudent to afford G1-G3 communities added protection given their "at-risk" status and larger sizes ("coarser" habitat) contributions to biodiversity conservation and ecosystem function.
2.3.10	Tables 8&9 speak to existing and desired snag densities x size across four snag analysis groups. Section 4.4.1 notes CWD as a monitoring indicator. Why are there no tables like 8&9 that are devoted to existing and desired CWD if this material is to be used as a monitoring

	indicator? CWD does not appear to be mentioned anywhere else in the DRAFT plan.
2.3.10	Table 11. Why in all but dry pine savanna are the smaller patch sizes (<1000 ac) a large percentage of the desired condition (across the seral states)? Do these reflect historic conditions? Smaller patch sizes in forests often result in reduced ecological integrity/function.
2.4.18	Several of the Objectives under the various Forest-wide Directions seem to be either rigid or counter to the goals of particular Alternatives. For example, Alternative D on p99 seems to suggest that there is no "objective to eliminate existing unauthorized motorized travel incursions per decade." Yet, other Alternatives speak to eliminating existing, unauthorized motorized travel incursions. In general, some Objectives need to be reevaluated and removed / rewritten where they are found to be unnecessary, misleading, or counter to the overall goals of specific Alternatives.
4.4.1	Does MON-WL-02 allow for / include an evaluation of human use activities on wildlife (e.g., biking, motorized activities)?