

June 5, 2019

Custer Gallatin National Forest
Forest Plan Revision Team
P.O. Box 130
Bozeman, Mt. 59771

Dear Forest Plan Revision Team:

Thank you for allowing the public to comment on the Draft Environmental Impact Statement (DEIS) for the Draft Revised Forest Plan (DRFP) of the Custer Gallatin National Forest. The comments below are representative of myself and my wife. We are very concerned over the survivability and the future of our Nation's forests as they face all sorts of assorted threats from society and climate change. The Custer Gallatin National Forest (CGNF) is certainly no exception in that regard. As I prepared comments for the Gallatin Wildlife Association, I learned a lot during the compiling and researching of documentation. I strongly feel we are at a crossroads for the future of the CGNF. The public and the Forest Service are supposed to be focusing on what management practices are to be employed to protect and preserve the natural resources while at the same time fulfilling mandates as stipulated under the Multiple Use-Sustained Yield Act. You have to do all these things as well as adhere to other federal stipulated laws and regulations. Not an easy task.

I could tell by reading the DEIS that considerable amount of time and manpower was employed in its compilation. The Forest Service should be proud of that work and effort. However, I was not so pleased with the product of the DRFP. I found that it is slanted to favor the users of the forest. Only one alternative, Alternative D, comes closest to supporting the ideals and actions necessary to protect the forest integrity, biodiversity, wildlife health, habitat and connectivity. Alternative D is not perfect, but it does encompass an overall better solution for the future threats that lie ahead of us. We feel there definitely needs to be a paradigm shift from forest practices of old to a new approach. The old ways cannot help deliver us from the onslaught of population growth and climate change, plus the fact that everyone wants (or rather, demands) their own piece of the pie. There needs to be a huge education and outreach program to help

educate the public about the need of resource protection with what we have left. Americans in particular have become spoiled with the old attitude of the West which prevailed during the westward expansion. Living in the 21st century, we need to be wiser and more scientifically informed about the consequences of our actions.

Our overall concerns focus on several issues that we have noticed over the years on the CGNF. Wilderness, wildlife connectivity and quality of habitat, climate change, the pressures of greater recreational use, and forest health issues are to name a few. Since so much of my time was spent on GWA's comments, I will briefly summarize those concerns here.

Wilderness:

To begin with, the finalization of the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA) must come to fruition. Over 40 years have passed since this idea began as a glimmer of hope. A lot of hard work since that time had been done by citizens, environmentalists, and personnel of the U.S Forest Service to make that dream become a reality and we still have not reached finality. Now we are facing recreational demands where we want to utilize these public lands as our own personal amusement park. These lands are widely known as the best intact ecosystem in the lower 48, and it is widely recognized as one of the last remaining and best functioning temperate ecosystems in the world. These lands, this forest, our wildlife deserve better than that. To sacrifice this quality of wildlife habitat over recreational emphasis is unconscionable.

The Gallatin Range is the only mountain range which begins within Yellowstone National Park that does not have some sort of wilderness protection. We support the wilderness recommendations in Alternative D of the Revised Draft Forest Plan. The entire 230,000 roadless acres of the Gallatin Range should be Recommend Wilderness. Wilderness character is much more conducive to wildlife connectivity than any other land-use designation. But the Gallatin Range is not the only mountain range facing pressures to support wilderness. Alternative D extends wilderness potential to the

Bridgers, Crazies and the Pryors as well, not to mention making a few additions to already existing wilderness areas such as Lee Metcalf and Abasaroka-Beartooth.

The Greater Yellowstone Ecosystem (GYE) must be kept intact. Home to abundant wildlife, with many of those being endangered or threatened and several more species needing to be labeled as such, places even more responsibility upon our shoulders to do the right thing. The wilderness recommendations in Alternative D of the DRFP offer the best protection for the Gallatin Range and other critical wildlife habitat across the Custer Gallatin National Forest. The removal of the Porcupine Buffalo Horn portion out of the HPBH WSA is a tragic mistake. More on this will be stated below, but this cuts into known grizzly bear habitat as well as other endangered or “should be” endangered species.

The new land use designations of Backcountry Areas should not be used as a replacement for wilderness values. Therefore, the use of motorized and mechanized uses is not compatible with wilderness or areas that are recommended wilderness. Backcountry areas do not hold the same protection as wilderness.

Wildlife and Wildlife Side Issues:

According to the Montana Natural Heritage Program, there are:

“600 species of mammals, birds, reptiles and invertebrates recorded on the Custer Gallatin, according to the Montana Natural Heritage Program in 2018.”

Yet many of these species will be facing significant, harmful and deadly futures unless special measures are put in place to stop the whirlpool of extinction from their lives. Even now we have learned during this comment period that the United Nations has come out with a projection of up to one million species of plant and animals may face extinction in our lifetime. We must provide the habitat in order for these species to survive. Hoping that all of these societal demands won't take a toll is a chance to great to take.

At the very least, WSA lands in the HPBH WSA should not be removed from the Grizzly Bear Recovery Zone and be designated away for other uses such as mountain biking interest, or for those in favor of Alternative B or C. This is prime grizzly bear habitat as well as for other more sensitive species. With these lands being removed from prime habitat, connectivity will never be achieved.

Without going into each species individually, there are at least two issues of wildlife that need to be addressed: wildlife connectivity and wildlife species of conservation concern.

Wildlife Connectivity: There has been great effort spent on trying to establish land-use designations in order to facilitate connectivity from the GYE to the Northern Continental Divide Ecosystem (NDCE) to the north and west. Wilderness designation is the best way to ensure lands are available for connectivity, yet Alternatives B, C and E stand in the way of this progress. The CGNF has set up two “key linkage areas”, both on either side of I-90 between Bozeman and Bozeman Pass. We support this effort, but we also see the need to protect these areas so wildlife is not deterred by increased recreational activity, noise and other human intrusions upon the landscape.

There should be language and understanding in the final revision plan that I-90 should not become an impermeable barrier to wildlife. Wildlife must be able to overcome this obstruction, and there are and will be efforts to establish overpasses and underpasses along this and other highways and interstates. When these opportunities arise that pertain to Forest Service lands, they must be able to work and facilitate completion of that work.

We are also concerned about the lack of wilderness determination in Alternatives B and C as the removal of wilderness potential in these areas will open up lands for increased recreational use. The fact that these areas are well within the Grizzly Bear Recovery Zone would be a tragic mistake. Not to mention this would increase the potential of grizzly bear/human conflict. It would or could remove and restrict the activity of grizzly bears, thereby hampering the opportunity for connectivity.

Species of Conservation Concern: There has been a drastic change from what the Gallatin National Forest once considered “sensitive species” to those species now determined and established by the 2012 Planning Rule as “Species of Conservation Concern”. Upon searching science and knowledge of species on the landscape, it was disappointing to learn how much we (the land and wildlife management agencies) don’t know. There needs to be a serious attempt to conduct assessment reports on many species of wildlife; moose, bighorn sheep, swift fox and others just to name a few. These species are assumed to be in “okay” status, but moose and bighorn sheep in particular are undergoing severe stress upon the landscape, stress from climate change, disease and loss of habitat to name a few.

The current list of species of conservation concern as designated by the Regional Forester is severely underrepresented on the CGNF. Moose, bighorn sheep, bison, wolverine and others should be considered for this determination. The Interagency Bison Management Plan has become an impediment for bison to exist in CGNF lands and has become obsolete. Bison have been shown to migrate onto and off the landscape as part of their seasonal behaviors, but they don’t stand a chance as they are killed as soon as they leave Yellowstone National Park. Zone 2 either needs to be expanded or removed completely in order for bison to be allowed on the landscape of the CGNF.

Forest Integrity:

Issues of forest health, timber, climate change, and fuels and fires are all related in forest dynamics. In reviewing the DEIS and DRFP, we must take issue with the concepts and precepts that the Forest Service is mandated to follow, which is why we have a problem with most of the Alternatives as listed. Alternative D is the closest policy that can help alleviate some of the problems brought about because of climate change, but even Alternative D needs improvement. To begin with, we don’t understand why Alternative D has more acreage forecasted to undergo vegetation treatments than either Alternative B or C. We totally resist the notion that the forest needs man’s intervention to make it healthy. We have not done a very good job over the past century and a half

and from what we've seen, there are no signs of the Forest Service or the CGNF willingness to change.

First, the Forest Service has got to stop exacerbating the effects of climate change by increasing the amount of cut timber. I sincerely urge the Forest Service to read and research the article by Dr. John Talberth, "Destructive Timber Sale Program Loses Nearly \$2 Billion a Year" by Center for Sustainable Economy. We must understand that live trees are more valuable than cut trees. The problem of carbon sequestration needs to be fully understood and policies implemented. Another reason is that we have a philosophical problem with thinking that man has a better idea of what a healthy forest or a productive forest looks like. Why can't a forest be a forest without man manipulating the resource. The act of vegetative treatments disturbs the landscape, disturbs wildlife, hurts the availability of the forest to sequester carbon, and can dry out a forest, affecting the overall local biomass and forest integrity. We could even be losing genetic value of trees that would be more fire resistant.

The amount of dollars spent on wildfire mitigation efforts and firefighting within the Forest Service has increased greatly over the last several decades largely as a result of climate change. The Forest Service needs to direct their attention on mitigation efforts in the wildland urban interface and not on fire fighting efforts in the depths of wilderness or on large landscapes on other forest lands. We would like to refer you to a pilot assessment program in the Sierra National Forest by Joe Scott entitled "Examining alternative fuel management strategies and the relative contribution of National Forest System land to wildfire risk to adjacent homes – a pilot assessment on the Sierra National Forest, California, USA". We do not support any alternative under Fires and Fuels in the DRFP. We do not support fuel mitigation efforts on the forest as we believe this is part of the natural process and man's intervention can only interfere with that process.

Climate Change:

We were disappointed in the lack of discussion on climate change. The effects of global warming are and will be extreme and harsh on many species of the CGNF. Moose, bighorn sheep, wolverines and other species are facing a conglomeration of threats and climate change is exacerbating those threats. The Forest Service needs to curtail the degree and amount of forest thinning and timber harvesting to help in carbon sequestration. These processes will allow the forest to dry out faster and become warmer, thus changing the biota of the forest floor.

We urge the CGNF to read and become familiar with a Forest Service publication, General Technical Report PNW-GTR-812 of June 2010 by Michael Furniss. In this report, he lays out several steps to help watersheds fight climate change. Without going into detail here in this format, the most striking comments are to allow the watershed to remain forested and in good condition, and maintain well shaded riparian areas and limiting ground-water withdrawals. The third step is to disconnect road drainage from stream networks. There are more, but these comments will remain somewhat limited at this point in time.

There needs to be a full discussion of climate change with its own series of guidelines and standards, both of which could list mitigation efforts. Climate change is the major driving force upon the forest and needs to receive the attention it deserves as it will affect what the CGNF will look like in the years to come.

Conclusion:

There is much more to be said, but after spending time writing the GWA comments, I'm burned out and time is running out. I ask that you please refer to those comments by GWA as they represent mine as well as those of GWA. Overall, my wife and I support Alternative D in regards to wilderness and the emphasis of natural processes, but we do not support the vegetative treatments of Alternative D.

There needs to be the approval of Alternative D in terms of wilderness and especially the original HPBH WSA boundary. There should be no removal of lands for mountain

biking or motorized use from known wildlife habitat. The key linkage areas need protection from alternative land use designations such as Recreational Emphasis areas. The CGNF needs to be willing to facilitate the construction of overpasses and underpasses.

The DRFP needs to have more attention paid to climate change and the assessment of species that are sensitive to it. Mitigation efforts need to be put in place and policies need to reflect the seriousness which this threat deserves. The Forest Service needs to change their emphasis on forest thinning and timber harvesting and refocus their attention to a new paradigm shift of forestry management. Fires and fuels and carbon sequestration could easily be made into a new policy to fight climate change.

Finally, there needs to be a refocus on species of conservation concern. Species such as moose, bighorn sheep, bison and wolverine need to have an assessment of species health and population. Attention needs to be given to species of conservation concern and develop policies to facilitate species recovery and management. No lands within the Grizzly Bear Recovery Zone should taken out of wilderness recommendation and turned over to recreational opportunities such as motorized or mechanized use.

We want to thank the CGNF for the opportunity to comment. The CGNF did a magnificent job in the compilation of the DEIS and the science to support that effort. The plan itself falls way short of what the DEIS supports. Although not perfect, Alternative D comes closest to the ideals of natural processes.

Sincerely,

Clint Nagel