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Comments:

Forest Fuels Reduction and Timber Production

We favor plan components that maximize forest fuels reduction and timber production. In on our own experience, our timber harvesting improved forest resiliency by salvaging dead and insect-threatened trees, reduced forest fuels, provided increased growing space so that trees can better resist insect attack, and lowered wildfire mortality risk. Additionally, wildlife habitat was improved and economic benefit to the local community was realized.

Wilderness Areas

Generally, we favor fewer new designated wilderness areas to preserve flexibility needed to manage the forests. In our own experience, our timber harvesting improved forest resiliency by salvaging dead and insect threatened trees, reduced forest fuels, provided increased growing space so that trees can better resist insect attack, and lowered wildfire mortality risk. Additionally, our actions improved wildlife habitat and realized economic benefit to the local community.

Bison and Bighorn Sheep as Species of Conservation Concern or Focal Species

We do not think bison should be designated as a "species of conservation concern" and a "Focal Species".

Yellowstone bison populations are above targeted numbers and continue to increase at healthy rates.

Additionally, quarantine facility utilization is increasing the movement of genetically pure bison populations beyond the Yellowstone Park ecosystem. Designation of bison as a "Focal Species" appears inappropriate.

Bighorn sheep are most visible in the Gardiner Basin during the winter months where I live. Judging from my observations of two bighorn groups, identification of them as a "species of conservation concern" or a "focal species" seems unnecessary. These groups appear healthy, well populated and thriving. Monitoring of populations, and health is an important criterion.

Bison

We wish to comment on the proposed Forest Service proposal for "a year-round self-sustaining bison population on the national forest" as it relates to the Gardiner Basin along the Yellowstone River. This proposal creates difficulties for the private property owners along the river valley. Forest Service holdings do not run continuously along the river but alternate with private lands which will be affected year-round. Geographically, the basin north of Gardiner along the river is relatively narrow. Bison favor lands along the river especially during winter and early spring, and their river presence affects much of the basin. While we appreciate this is a programmatic document at a planning-level scale, it leaves open significant questions regarding impacts, how bison population increases will be managed, costs of management, assignment of management responsibility, bison habitat improvements and long-term effects of the increased bison fencing which will likely be necessary, among other concerns. Given that bison are managed through the IBMP, we expect this proposal to be thoroughly evaluated prior to implementation. Until a proper evaluation is conducted, we do not support a year-round self-sustaining bison population in the Gardiner Basin along the Yellowstone River. Any Forest Service actions related to bison must comply with the IBMP. We object to the "no exceptions" provision related to bison management on Forest Service lands contrary to the IBMP.