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Comments:

Comment draft plan - CGNF

May 9, 2019

Forest Plan Revision Team

PO Box 130

Bozeman, MT 59718

Dear Revision Team,

Thank you for the opportunity to comment on The Custer Gallatin National Forest's Draft Management Plan. Specifically, I am commenting on the Absaroka Beartooth and Madison, Henrys Lake and Gallatin geographic areas. These areas provide valuable wildlife habitat, headwater streams and diverse recreational opportunities within the Greater Yellowstone Ecosystem.

Booming urban growth, advances in recreation technology, and climate change related impacts are putting increased pressure on our public lands. It is critical that the new management plan get ahead of these threats by permanently preserving an expanded area for recreation, protecting wildlife populations from senseless slaughter and human intrusions, and implementing strategies to better understand and adapt our public lands to a changing climate.

I support the full incorporation of the Gallatin Forest Partnership (GFP) Agreement into the plan for the Gallatin and Madison ranges. However, while alternative C incorporates parts of that agreement, it does not accurately reflect the GFP's recommendations for wildlife protections or recreation monitoring. Looking outside the GFP agreement, it is also critical that we protect and enhance other areas, including wildlife linkage areas with existing wilderness, and include enforceable climate change components.

I recommend the following revisions to the draft plan:

1. Ensure wildlife connectivity in portions of the Madison, Henrys Lake, and Gallatin Geographic Area that aren't otherwise protected by the grizzly bear recovery zone. The Madisons are critical for protected wildlife movement to areas beyond the National Forest;
2. Habitat protections for grizzly bears must extend wherever

population health is monitored and into areas important for connectivity. Grizzlies must also be protected by their designation as a Species of Conservation Concern;

3. Plan components must support a year-round self-sustaining bison population within tolerance areas on National Forest System lands;

4. West Pine and Porcupine Buffalo Horn backcountry areas must mirror the Cabin Creek Wildlife Management Area in its wildlife protection and wild character plan components;

5. Recreational use must be monitored more extensively by area, and standards must ensure that increasing recreation is balanced with wildlife protection;

6. Manage existing wilderness areas in line with the 2020 Vision;

7. Given the uncertainties of climate change, continued monitoring of vegetation, invasive species, aquatic resources, fire, and erosion must explicitly assess the effects of climate change and guide adaptive management, as is currently required by the 2012 planning rule (219.12(a)(5)(vi)); and,

8. In addition to the thirty (30) rivers recommended as eligible for Wild and Scenic designation, you must also include Taylor Creek, Hellroaring Creek, and the South Fork of the Madison due to their outstanding and unique wildlife values.

I am pleased to see the Custer Gallatin National Forest taking a fresh look at the adjoining area ecosystems and the many plant and animal species that depend on them. The Draft Plan and DEIS includes many strong points, and with some needed revisions the resultant management plan will be an important and invaluable tool to guide decades of sustainable forest management. Thank you for your good work on this vitally important issue.

Respectfully,

Mr. H. Dennis Shumaker
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