

Date submitted (Mountain Standard Time): 6/6/2019 7:15:48 PM

First name: Michael

Last name: Tranel

Organization:

Title:

Official Representative/Member Indicator:

Address1: P.O. Box 435

Address2:

City: Red Lodge

State:

Province/Region: Montana

Zip/Postal Code: 59068

Country: United States

Email: MTRANEL66@HOTMAIL.COM

Phone: 4066790422

Comments:

Thank you for the opportunity to comment on the Draft Revised Forest Plan for the Custer Gallatin National Forest. I urge you to select all or most of the components from Alternative D for the following reasons:

1. Land Management Purposes: As stated on page 12, the mission of the US Forest Service is "to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." Meeting this purpose requires a very conservative (in the sense of protecting land as designated wilderness, for example) approach because of climate change, population growth, and overall increased impacts of human activity.

2. Regional Context: As some organizations have noted during the review process, the Custer Gallatin National Forest forms the northern border of the Greater Yellowstone Ecosystem, which is among the largest intact temperate zone ecosystems in the world. The "island ranges" such as the Pryor and Crazy Mountains are also unique in Montana and the contiguous 48 states. Under this general topic area I would also encourage forest managers to think about the cultural and historic resources of the Custer Gallatin. This is discussed beginning on page 73, but the text in the draft plan does not include the most important point: cultural and historic landscapes that exist today will grow exponentially in value as more of the surrounding lands are intensively used and developed. For example, with wilderness designation and high levels of land protection, it will still be possible 30 years from now to see the land as it appeared during the travels of the Nez Perce in 1877. And it will feel the same in those areas as well.

3. Anticipated changes based on scientific analysis of trends: If the plan is to be in place for up to 30 years, as has been the case in the past, then it must anticipate significant changes. These changes are not difficult to predict based on scientific information and trend analysis. For example, visitor use in the Beartooth Mountain Range and in Yellowstone National Park has increased up to 85 percent in the past three decades. Based on this, we can expect significant additional visitor use over the life of this plan. It must provide for a range of opportunities, erring on the side of land protection, so that the purpose of meeting the needs of future generations can be met. We can expect that the value of protected lands, especially designated wilderness but even those in the multiple use category, will increase exponentially. The baseline changes over time, so that sustainable use and multiple use may have different definitions and contexts 30 years from now. Protected landscapes will be invaluable, and people will not be making statements in 2050 about "I wish they had done more logging 25 years ago."

4. Socio-economic changes moving further away from a resource extraction economy: Related to #3 above, we can expect that Montana will continue to move further away from a resource extraction economy and more into a tourism and "desirable place to live" type of economy. The greater economic values over the life of this plan will clearly come not only from outdoor recreation and tourism, but also from people choosing to live within the region in which the Custer Gallatin is located. These residents bring economic value in the sense of spending money in the local areas in which they live, and they also help the economy through non-labor sources such as dividends and retirement spending. Land values near protected areas, especially designated wilderness, will continue to increase. There are numerous studies that show this to be the case throughout the western US over the past 20-25 years. Related to these facts is the vision statement on page 15 that includes language such as "enhancing the quality of life for those who use and depend on the Custer Gallatin for life-enriching activities and livelihoods."

5. Ecosystem services: The value of the lands within the Custer Gallatin for ecosystem services can be expected to increase exponentially in the next three decades. This analysis, beginning on page 70 of the draft document, is limited in that it doesn't take into account values such as clean air and water. If these and related values are taken fully into account, there is a clear need to designate additional wilderness areas and reduce resource extraction and motorized use.

6. Climate change: The potential impacts of climate change are not thoroughly addressed or even acknowledged in the plan. This is inconsistent with the directive on page 13 to use the best available science. If climate change impacts were acknowledged, there would be a clear need to protect more wilderness area, which assists with carbon sequestration, and reduce the areas zoned for resource extraction and motorized use, which encourage climate-damaging activities. I believe the language on page 51 about Carbon Storage and Sequestration is too limited in scope since it focuses mainly on forestry practices.

While the analysis in the draft plan is very thorough in certain areas such as wildlife and vegetation, I believe it could be more robust in the areas listed above, especially ecosystem services, climate change, and socio-economics.

A suggested edit: replace the term "game" with "wildlife" throughout the document. The subtitle "Big Game" on page 59 will sound even more outdated 30 years from now as it does today. This is an 18th century term originating in a clear bias towards hunting, whereas "wildlife" is modern, correct usage. In Montana, the department is "Fish, Wildlife, and Parks" not "Fish and Game."

People will argue in favor of less designated wilderness and lower levels of protection for the lands in the Custer Gallatin with statements about "locking up land" and the need to provide more motorized access. However, the vast majority of public lands in Montana are already open for motorized access at some level. And in regards to a land "lock up," the only true lock up is using land in non-sustainable ways such as mining. Protecting lands through wilderness designation is essentially putting those lands in the bank as an investment for future generations. As well known South African conservationist Ian Player stated, "Protected areas don't lock up land; they unlock the human spirit." The Custer Gallatin can only have a successful role in that if there is significantly greater wilderness designation.

Thank you again for the opportunity to comment, from a Red Lodge father who grew up exploring and enjoying the Beartooths and who wants to share that with his children and grandchildren.