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To Whom It May Concern:

A thirteen-year resident of Billings, Montana, I have been lucky to experience the Custer Gallatin National Forest as a hiker, camper, birdwatcher, and natural history buff. Before moving to Billings in 2006, I lived in Powell, Wyoming (1991-95), and when I returned to the area I was overjoyed to find that my old haunts in the Pryor and Beartooth Mountains hadn't appreciably changed in eleven years. I commend the Forest Service and the local citizenry for their good care of these sacred places.

Unfortunately, there are more and increasing pressures coming to bear on Montana's forestlands. In light of this, I am particularly distressed that, despite its thoroughness in many areas, the Custer Gallatin Draft Revised Forest Plan gives short shrift to two topics of worldwide concern and a third of local interest: the decline of invertebrates and other non-charismatic wildlife species, climate change, and urbanization in Montana. In fact, the term "mass extinction" or "sixth extinction" is not to be found. Page 43 deals briefly with pollinators and page 58 takes white-nose bat syndrome (WNS) into account, and white-bark pine receives more mention earlier, but that's about all the focus there is on world-altering rates of extinction and catastrophic population declines in often overlooked wildlife species. It is unfortunate that the Plan, in general, treats wildlife and wild flora as collections of individual species rather than as communities of interrelated beings. Perhaps this is the result of legalistic, political, and scientific exigencies.

Similarly, I count one mention of the importance of "Carbon Storage" (p. 51) and some mention of wildfire, but the Plan as a whole reflects no more urgency concerning global warming than it does mass extinction. "Climate change" appears just eight times in the Plan, with half of those references in the glossary. This omission has implications for the viability of the Plan itself. For example, the Plan notes that "Smoke from wildfires is considered a natural part of the landscape and background conditions, and thus is exempt from national ambient air quality standards violations." While this may be true on its face, increasing wildfires due to climate change will adversely affect people downwind. I know from personal experience that on some days in late summer, the air quality in the mountains seems just as bad as it is at the CHS Refinery in Laurel. I would like to know what the Forest Service's scientists will do in regard to this serious problem. Is forest thinning in order? Is pine bark beetle infestation something that should be fought or left to take its natural course? What exactly is "resilience"? If it refers only to "The capacity of a (plant or animal) community or ecosystem to maintain or regain normal function and development following disturbance," what happens when conditions change so much that "maintaining" or "regaining normal function" becomes impossible? How will "normal function" be defined twenty years from now? How will more frequent forest fires change the ecology of the Custer Gallatin? Where, exactly, is the preparation? (On a side note, the Plan deals with ski resorts, but does not mention what will happen if winter snowfall gives way to spring rain. For that matter, since the Custer Gallatin supplies water for many communities, how will changing patterns of precipitation affect the timber industry, mining, and other water-intensive/water-affecting usage?)

Since these two pressing issues of mass extinction and global warming are not addressed in any depth, it would appear that, to some extent, this Plan is already obsolete. It's hard to imagine its relevance thirty years from now.

As far as urbanization, particularly in Bozeman and Billings, there doesn't seem to be much forward-thinking in regard to the growth trends of these two areas and what that will mean to the Custer Gallatin. Specifically, increased recreational pressure from Billings on the Pryor Mountains could completely change the character of that part of the National Forest. City residents might expect more hiking opportunities, for example, than their more rural counterparts. And, in combination with projected rural depopulation, current uses of the landscape (ORVing, hunting) could give way to more "modern" pursuits (mountain biking, zip lines, backpacking). However, if ORV use were to expand appreciably, could the Pryors sustain such pressure and still retain their value as an ecological, botanical "hotspot"? Can we assume that indigenous reverence for the land can coexist with mountain biking, motorized trails, motorized off-road use, and damage that may be incurred with the presence of more recreationists (of all types) in the Pryors? And what impacts will changing human populations have on migratory birds, bears, and big game animals? To answer these questions, I could not find any detailed discussion of demographic change in the Plan.

Thinking in the long term, however, leads me to make the following suggestions about places and creatures I love.

Alternative D seems the best in its visionary outlook concerning wilderness. How better to preserve species, hedge against a changing climate, and protect resources from overuse than to designate as much wilderness as possible? I can personally vouch for the wilderness and ecological characteristics of these areas: Big Pryor, Bear Canyon, Punch Bowl, Line Creek Plateau, West Fork Rock Creek, Crazy Mountains, East Rosebud to Stillwater, Mystic, and Red Lodge Creek. I don't quite understand, however, why Bear Creek in the Pryors would be limited to 1.8 miles of scenic designation. The whole canyon system is a gem and rarely traveled, if at all, beyond the point where the trail peters out into a tangle of burrs and brambles. Climbing up the hillside to the southeast at this point leads to a panoramic view of the canyon and reveals its wildness. It is also possible to climb along the northwest rim, which allows the hiker to look down on an impossible garden of cottonwoods, lazuli buntings and yellow-breasted chats, and high cliffs. (I have been to Bear Creek when it was a wonderland of pools, rivulets, and butterfly gardens-a wet year!)

Alternative D is also correct in its conclusion that "Landing strips are not suitable anywhere in the National Forest" (page 93).

In terms of specific wildlife species, Alternatives B, C, and D seem equally effective. But I am disappointed that forestwide desired conditions include (page 85) keeping caves "open for the use, enjoyment, and provision of benefits" rather than closing them to protect roosting bats from exposure to white-nose syndrome. True, another way of looking at bat conservation involves working with cavers, and the Plan could mention this. While WNS has not, according to the Plan (page 58), been detected in the Custer Gallatin as of 2019, it is only a matter of time before it sweeps through our region. It has already infected and decimated bat populations from coast to coast. More aggressive measures to protect and, if necessary, restore colonies that will probably succumb to the virus should be prepared. As the Bat Conservation website notes, "WNS has proven unstoppable. Bats have spread it rapidly across an entire continent since 2008, killing millions of cave-hibernating species." However, bat specialist Merlin Tuttle notes that colonies are rebuilding. It would be useful if Custer Gallatin National Forest had some plan in place to 1) work with cavers to identify caves that could be sites for eventual recolonization and 2) identify alternative hibernacula that have been previously overlooked or unknown and may function as reservoirs of vulnerable species.

To summarize, while I am disappointed at the fairly limited scope of the Custer Gallatin Draft Revised Forest Plan, I commend the staff for creating a readable document with some worthy goals. I wish that there hadn't been a "feast or famine" approach to Recommended Wilderness Areas, where Alternative D is the only viable option. Still, Alternative D is the only viable option. Backcountry Areas simply leave too much administrative flexibility and seem designed more to appease those who object to the mention of "wilderness" than to protect the ecological communities that define wilderness. In fact, the Plan's wilderness recommendations, even those in Alternative D, are fairly modest and should be adopted if not expanded.