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Comments:

Comment draft plan - CGNF

May 28, 2019

Forest Plan Revision Team

PO Box 130

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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 more and more pressure on our public lands. It is critical that the new management plan get ahead of these threats by cementing our recreation footprint in place, protecting wildlife populations, and implementing strategies to better understand and adapt 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 and existing wilderness, and include enforceable climate change components.

I recommend the following revisions to the draft plan:

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 wildlife movement to areas beyond the National Forest. Habitat protections for grizzly bears must extend wherever population health is monitored and into areas important for connectivity. Grizzlies must also be designated as a Species of Conservation Concern.

Plan components must support a year-round self-sustaining bison population within tolerance areas on National Forest System lands. West Pine and Porcupine Buffalo Horn backcountry areas must mirror Cabin Creek Wildlife Management Area in wildlife protection and wild character plan components.

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

Manage existing wilderness areas in line with the 2020 Vision.

Given the uncertainties of climate change, monitoring questions for vegetation, invasive species, aquatic resources, fire, and more must explicitly assess the effects of climate change and guide adaptive management as required by the 2012 planning rule (219.12(a)(5)(vi)).

In addition to the 30 rivers recommended as eligible for Wild and Scenic designation, include Taylor Creek, Hellroaring Creek, and the South Fork of the Madison due to their outstanding wildlife values.

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

Respectfully,

Mr. Elihu Cohen
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