

**GALLATIN WILDLIFE  
ASSOCIATION**

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The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters, anglers and other wildlife advocates in Southwest Montana and elsewhere. Our mission is to protect habitat and conserve fish and wildlife. GWA supports sustainable management of fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. We support the Montana constitution which states: "the opportunity to harvest wild game is a heritage that shall forever be preserved" and that "the legislature shall provide adequate remedies to prevent unreasonable depletion of natural resources."

April 22, 2019

Leanne Marten, Regional Forester

U. S. Forest Service

26 Fort Missoula Rd.

Missoula, MT 59804

Dear Ms. Marten:

We were disappointed with the results of our pre-scheduled meeting with you on April 8 to discuss issues relating to species of conservation concern, as proposed in the draft revision of the Custer/Gallatin Forest (CGNF) long-range Plan. Your inability to spend significant time with us left many concerns unaddressed, as indicated below.

We are very concerned that the CGNF Plan is replacing 29 vertebrate species listed as sensitive on the Forest, with only 2 vertebrate species of conservation concern. This is an unprecedented step backwards from wildlife conservation by the Forest Service. Since the Regional Forester is responsible for accepting or rejecting species for listing as "of conservation concern" we are appealing to you for more information.

First, we note that a "desired condition" for the CGNF is that "a complete suite of native species is present, with sufficient numbers and distribution to be adaptable to changing conditions for long-term persistence." (Draft plan, p. 56). We find much in the wildlife section of the draft plan to indicate that these are hollow words.

Since the 2012 planning rules require that a species may not be listed as of conservation concern unless the species is known to be present in the plan area, we note that extirpated species are left with no specific categorical emphasis. In this respect, we are concerned about the failure to list plains bison as a species of conservation concern. While *known to occur* on the CGNF, bison are completely extirpated from about 99% of their native range on the Forest. Excepting a few individuals, bison occur only seasonally on a tiny fraction of their native range. They are essentially extirpated as a year-round population. While Forest Service policy seems to abdicate its responsibility for such wildlife to the states, the legality of this abdication is questionable, and there is no requirement to avoid clarifying concern for such species in Forest Service planning.

Regarding bighorn sheep, we have submitted abundant information – peer-reviewed as well as expert opinions – related to the inadequate numbers and distribution of bighorn on the CGNF due to habitat constraints. We find very little recognition of this information in CGNF assessment or planning documents. Moreover, the Assessment of Species Evaluated as Potential Species of Conservation Concern (Appendix A, p. 179) fails to mention the numerous negative effects of small isolated populations including genetic degradation, or habitat loss due to forest and brush encroachment as processes responsible for small or declining and unproductive bighorn herds on FS lands. Rather, the FS merely states “numerous” small populations persist in suitable habitat as rationale not to identify bighorn as a potential species of conservation concern. The 2010 Montana Bighorn Sheep Conservation Strategy lists 12 herds on the CGNF with none greater than 200 animals, 10 less than 100 animals and one extirpated. We left you a table summarizing this information, with two letters on April 8, 2019. We have attached them here again for your review and response.

Regarding habitat concerns for bighorn sheep, we note that the most resilient populations of bighorn use 6 seasonal ranges connected by habitually used migration corridors. On many FS lands, including the CGNF, forest encroachment has contributed to declining bighorn populations and habitat abandonment. As a result, it is common today for bighorn herds on FS lands to use fewer than 6 seasonal ranges, with bighorns concentrating at lower elevations on Forest edges where they are exposed to domestic sheep and goats, with their diseases. Many seasonal ranges, such as lambing and rutting areas are unknown. We contend that a desired future condition for bighorn sheep on the CGNF will require vegetation management to improve or reestablish some seasonal ranges and migration corridors in the interior of FS lands. The difficulty and need for this activity is a threat to long-term persistence of bighorn sheep on CGNF.

How should we proceed? We have not heard back from you and we do not feel our concerns have been fairly or adequately considered. We suggest, for both bighorn sheep and bison, convening Science Reviews of the identification and use of Best Available Science Information to inform the assessment and planning process (FSH

1909.12, Chapter Zero Code, p. 32). Something similar was done for bighorn sheep in the Rocky Mountain Region (Beecham et al. 2007).

In the absence of such reviews, we request all documentation and communications regarding the decisions not to list bison and bighorn sheep as species of conservation concern on CGNF. We seek information used to document adequate distribution, lack of threats to long-term persistence, and lack of negative trends in habitat availability and use, as noted in the planning handbook (p. 35, Chapter 10 and elsewhere); and what information was accepted and what was rejected as Best Available Science Information for this purpose.

We also request an explanation, including all documentation and communications, regarding the Regional Forester's rejection of western toad, Arctic grayling, Yellowstone cutthroat and westslope cutthroat as species of conservation concern.

Please explain why greater prairie-chicken, wolverine, moose and swift fox were not included in the assessment of species for consideration as species of conservation concern.

Sincerely,

Glenn Hockett, Volunteer President  
Gallatin Wildlife Association

Jim Bailey, Board Member  
Gallatin Wildlife Association

#### Literature Cited

Beecham, J.J., P.C. Cameron, and T. D. Reynolds 2007. Rocky Mountain Bighorn Sheep (*Ovis canadensis*): A Technical Conservation Assessment. Prepared for USDA Forest Service, Rocky Mountain Region, Species Conservation Project by TREC, Inc., 4276 E. 300 North Rigby, Idaho 83442. Online at:  
<http://www.fs.fed.us/r2/projects/scp/assessments/rockymountainbighornsheep.pdf>