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Submitted via email to [cgplanrevision@fs.fed.us](mailto:cgplanrevision@fs.fed.us)

Dear Supervisor Erickson,

Thank you for the opportunity to comment on the *Draft Revised Plan and Draft Environmental Impact Statement* for the Custer Gallatin National Forest. The Custer Gallatin National Forest (CGNF) is situated in the Greater Yellowstone Ecosystem (GYE), which is amongst the most ecologically intact places on the planet and a recognized biological hotspot. This imposes a great responsibility on the forest service to elevate protection of the wildlands, roadless and unroaded areas remaining on the CGNF for the benefit of wildlife, waters, ecological sustainability, and ecosystem integrity, above all other interests and values.

At the end of the day the Custer Gallatin's management plan must transcend any personal interests, societal desires, or other insatiable demands of a rapidly growing population. Rather it must be rooted in the critical role the CGNF plays in maintaining the health of the Greater Yellowstone Ecosystem and its world-class wildlife and fisheries including grizzly bears, elk, gray wolves, Canada lynx, gray wolves, wolverine, Greater Sage Grouse, Westslope cutthroat trout, and an array of others including bison.

As I write these comments three judges from the Court of Appeals on the Ninth Circuit are deciding how to proceed on the lawsuit of Juliana v United States, otherwise known as the Youth Climate Case. This case and an escalating international climate action movement spearheaded by 16-year old Greta Thunberg promise to change everything.

This past September, Judge Christensen vacated the Final Rule delisting the Greater Yellowstone Ecosystem grizzly bear in good part for three major issues: delisting the Yellowstone bears without showing how the rest of the grizzlies in the Lower 48 states would be affected or how the six recovery areas might be linked together for genetic diversity. The court made it clear we need a meta-population that's connected in order for the grizzly to be recovered. Importantly the GYE grizzly bear must be provided quality habitat connected to the Northern Continental Divide Ecosystem as well as the Selway Bitterroot and Cabinet Yaak. The principle of connectivity applies to other wide roaming species as well.

Detailed in the 2012 planning rule, Section 219.8 Sustainability (a) (1) Ecosystem Integrity the

plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account: (i) Interdependence of terrestrial and aquatic ecosystems in the plan area. (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area. (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area, and (iv) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change.”

In order to provide connectivity for grizzly bear and other wide roaming species and refugia for wildlife and fisheries in the face of impending climate change, the CGNF must maintain or restore all its remaining intact wildlands and rivers. For these reasons I support Alternative D, strengthened.

#### Human Population Growth and Increased Recreational Demands are Core Issues

Gallatin is the fastest growing county in Montana and amongst the fastest in the nation. In recent years growth is estimated to exceed four percent annually. The numbers alone do not adequately identify the problem. Groups such as the Gallatin Forest Partnership, which popped up following the disbandment of the Gallatin Community Collaborative, appear to have undue political influence and access. Accommodating the housing needs and infrastructure alone will put additional pressure on achieving connectivity and the possibility of securing linkage areas for grizzly bear recovery and other wide roaming species.

Accommodating the industrial recreational demands of a range of user groups carries this pressure into wildlands and impedes connectivity and refugia for wildlife. The plan must identify and cap recreational use in critical areas. Increased recreational use can harm a range of focal species that are indicators of ecosystem health. It is important that the forest plan prohibits mechanized and motorized use in recommended wilderness and other vulnerable wildlands. The speed and quiet nature of mountain bikes is increasingly recognized as harmful to wildlife. Summer and winter motorized have long been known to be harmful to wildlife. Even quiet recreation such as hiking and skiing could have an adverse effect depending on the level of activity and this must be known and addressed in the plan. A rapidly emerging mountain bike community is vocal, well organized with growing political access, and has the backing of dealers where they purchase expensive equipment. But even amongst this group there are many who strive to avoid impacting ecological integrity of wildlands. The rest need to learn. Education, enforcement, and monitoring of recreational use must be a priority in any recreational program.

#### Climate Change is a Core Issue Across the Landscape

Climate change is a significant factor influencing the CGNF with projected increases in temperature and changes in amount and timing of precipitation including dwindling snowpack and earlier spring snowmelt. These will affect the forests ability to support rare and imperiled species particularly those that are snow dependent, including lynx, wolverine, as well as grizzly bear that hibernates in winter. Climate change is accelerating more quickly than previously

thought and effects will undoubtedly become apparent over the life of the plan, including drought, fire, impacts to food sources and other vegetation, and elevated stream temperatures and changes in flow amount and timing. These changes will affect wildlife, fisheries and other resources.

According to a report by The Craighead Institute, “We now know that intact, roadless areas of secure habitat are critical for maintaining healthy ecosystems, particularly in the face of our rapidly changing climate. Intact, functioning ecosystems are our best hope for removing carbon dioxide from the atmosphere and sequestering it, and for buffering the impacts of climate change. Intact areas with wilderness characteristics are essential for maintaining the fish and wildlife populations that provide Montanans with a quality of life that has disappeared from most other states.”<sup>1</sup>

As stated in the Assessment for the Flathead National Forest, Part 2, page 249, “Climate change will likely effect physical and biological processes and attributes within wilderness” and “fundamentally compromise the degree to which effected areas function as a refuge from the effects of an expanding civilization.” Amongst the adverse ecological impacts cited is, “Amplifying the adverse effects of fragmentation by increasing the need for some species to migrate”. I strongly urge the CGNF to address this threat to ecosystem function by including as recommended wilderness, any potentially suitable lands that serve to secure functioning habitat for migrating species. Under the pending threats of climate change, absence of pristine quality should not limit protection of areas that can be restored/rewilded. Results of a FS evaluation of RACR, “highlight the value of inventoried roadless areas toward maintaining a representative network of relative undisturbed areas that function as conservation reserves supporting a diversity of plant and animal species.” In particular roadless protection could protect biologically valuable low-elevation roadless areas and compliment existing protected areas.<sup>2</sup>

The Gallatin Range, with its location directly north of Yellowstone National Park, is critical in providing potential refugia to wildlife impacted by climate change. The high elevation of the Madison, Absaroka, Beartooth and Crazy Mountains also provide critical refugia as the climate warms in the coming decades. Except for the Crazy Mountains, significant portions of these ranges are protected as designated wilderness. I encourage you to protect all suitable areas protect areas as detailed below to buffer wildlife and fisheries from the effects of climate change.

### Wildlife Habitat and Connectivity

Under the 2012 planning rule cited above and associated directives, the Forest Service is required to consider, plan and manage for ecological connectivity, including explicit requirements for maintaining and/or restoring connectivity on national forest lands as well as facilitating connectivity across varying land ownerships. The 2012 planning rule requires that the development of plan components must consider habitat and habitat connectivity (§ 219.9 (a)(1)). (ii) Contributions of the plan area to ecological conditions within the broader landscape

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<sup>1</sup> The Craighead Institute. 2015. Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area: A Report for the Lee and Donna Metcalf Foundation. Frank Lance Craighead, PhD. November 2015

<sup>2</sup> Turner, James Morton, 2006. Conservation Science and Forest Service Policy for Roadless Areas. Conservation Biology V. 20, No. 3, 713-722. June 2006.

influenced by the plan area. (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.

I encourage the CGNF to pursue (4) Opportunities to coordinate with neighboring landowners to link open spaces and take into account joint management objectives where feasible and appropriate. However, despite a key finding in the Final Terrestrial Wildlife Report (WR) developed for the Assessment, pointing out the importance of working within and across administrative boundaries to ensure connectivity, maps provided on the website almost invariably stopped at the forest boundary, with the exception of the general vicinity map. I had a difficult time trying to piece together the various areas with adjoining Helena Lewis and Clark National Forest. I can only hope the CGNF is working with the Helena-Lewis & Clark National Forest to ensure that key areas in the Crazy Mountains, which span both jurisdictions, and other opportunities for connectivity including those described below, are protected.

The CGNF plays a key role in facilitating wildlife movement and connectivity for wide-ranging species such as grizzly bears, wolverine and others. It could and should play a key role in connectivity for GYE bison.

The Wildlife Report emphasizes the importance of several of the CGNF's ranges for wildlife connectivity: (1) Big Belt, Bridger and Gallatin Mountains; (2) the Boulder, Tobacco Root, Gravelly and Taylor-Hilgard Ranges; and (3) the Selway-Bitterroot, Lemhi, Centennial and Madison ranges. Each of these routes involves some portion of the Custer Gallatin National Forest plan area. Smaller ranges north of I-90 in the Central Linkage Region will become even more important for wolverines and other species due to a warming climate and changes to their historic habitat. Inventoried and other suitable roadless and unroaded areas should be recommended for wilderness as a means to protect the wilderness character and connectivity value of these lands.

### Species of Conservation Concern

I support the Forest Service's designation of Greater sage-grouse and prairie dogs as species of conservation concern. As required by law and policy, grizzly bears should be fully evaluated as a potential species of conservation concern per the Final Conservation Strategy and the Final delisting rule for Yellowstone grizzly bear. The Forest Service must fully evaluate grizzly bears as a potential species of conservation concern. Grizzly bears face significant threats, primarily from human-related causes and loss of key historical food sources, which affect their ability to persist in the plan area. Specific standards should help ensure connectivity between the GYE and NCDE.

The stressors of increased population growth including landscape fragmentation and recreation demands on the CGNF, as well as that of climate change continue to pose a serious threat to grizzly bear. Delisting of the GYE grizzly bear compounds these stressors. Grizzly bear within the GYE are at risk both within the national forest and on private and other lands adjacent to the CGNF and within the broader landscape, which connects geographic areas and adjoining national forests. The responsible official must consider grizzly bear as a species of conservation concern in context of the broader landscape. We urge you to do so and to document your

rationale as required by § 219.9(2) and 219.14(a), as well as coordination with Tribal and other entities.

I also encourage and support Regional Forester Leanne M. Marten listing American bison as a species of conservation concern in Region 1. The American bison must be listed as a species of conservation concern, reintroducing fire as a natural force in expanding habitat, removing barriers to migration, and securing habitat connectivity.

## **Wilderness Management**

### Non-conforming Uses of Recommended Wilderness

Sec. 4 (c) of the 1964 Wilderness Act states in part that

“...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of **mechanical** transport, and no structure or installation within any such area” (emphasis added).

Subsequently, Forest Service regulations and policy have defined bicycles as a form of mechanical transport and they are prohibited in all national forest wilderness areas.

### Traditional Skills and Tools Program

To be consistent with the Wilderness Act Section 4(c), I request a standard requiring traditional skills and tools for all work on infrastructures in Wilderness Areas and recommended wilderness, including but not limited to trails, bridges, crossings and airstrips.

I fear omission of a standard will result in acceptance and expansion of non-conforming uses pertaining to motorized saws and other tools in wilderness and recommended wilderness. The Forest Service has been a leader in maintaining the traditional skills and tools needed to guarantee work performed in wilderness and other protected areas are accomplished without motorized or mechanized tools, as required by section 4(c). Requirements for minimum tools support the funding and viability of this program and would assure a workforce with the skills necessary to comply with this conforming use. The Forest Service has a rich and proud history in ‘traditional skills’, one that is more than capable of supporting all necessary work consistent with the Wilderness Act. Please don’t diminish Wilderness or this history. Projects using traditional skills and tools are also popular with volunteers and partnering organizations.

## **Alternative D:**

Thank you for providing Alternative D. It goes a long way to protecting the ecological integrity of the Custer Gallatin National Forest, which is a primary criteria for our wildlife and other conservation values and in helping secure their survival during climate change in the coming years. I support Alternative D Wilderness recommendations and the emphasis on natural

processes and restoration. It would recommend wilderness for portions of the Lionhead, Cowboy's Heaven, Crazy Mountains, Bridger Range, Pryor Mountains, and Tongue River Breaks in eastern Montana as well as key additions to existing wilderness such as Emigrant Peak, Dome Mountain, Tie Creek, Deer Creek, Rock Creek, Line Creek Plateau, etc. to Absaroka Beartooth Wilderness, and additions to the Lee Metcalf Wilderness.

I request Alternative D be strengthened as follows:

- The entire 230,000 roadless acres in the Gallatin Range should be included in order to best protect critical habitat and linkage areas. The Hyalite Porcupine Buffalo Horn WSA is an essential wildlife corridor from Yellowstone National Park to the Northern Continental Divide Ecosystem (NCDE).
  - The Porcupine Buffalo Horn area is a critical component of the Primary Conservation Area for grizzly bears, and is some of the most important wildlife habitat in the WSA. It deserves long-term protection.
  - The West Pine/Dry Creek area, the northeastern section of the HPBH WSA provides an important corridor for wildlife moving north across I-90 to the Bridgers and beyond. This area should be recommended for wilderness and the boundary drawn to allow the small incursion of current mountain bike use on the West Pine/Dry Creek trails.
  - The upper part of the South Cottonwood Creek drainage is wild and scenic, why it was included in the HPBH WSA decades ago. It should be recommended for wilderness.
  - The Hyalite area should have a standard specifying no new trails. This habitat and linkage zone is too important to wildlife not to be permanently protected as wilderness.
  - Currently many of the wilderness qualities of the HPBH WSA are being eroded due to increasing demand for recreational experiences and technologies. As the population grows these pressures will increase. Including the entire crest would limit these uses and better protect the wilderness qualities of this amazing area.
- The Lionhead roadless area provides excellent habitat for grizzly bears, lynx and elk, among other species. The full 23,000 acres should be included. Mountain bike use has proliferated in the Lionhead over the years. As a non-conforming use in recommended wilderness, such use should not disqualify this area for Recommended Wilderness. Mountain biking should not be allowed to continue.
- The draft revised plan does not go far enough to protect Wilderness it should include specific standards with direct enforceable language that protects the 5 qualities of Wilderness
- The Wilderness management plans for the Absaroka-Beartooth and Lee Metcalf require stronger standards in the plan to protect these areas and an objective to create management plans either concurrently or within two years of the final forest plan.
- Limit large groups to 8 head of stock and 12 people in Wilderness areas. Zone 1 which is the most pristine zone in Wilderness should have a stand alone standard stating, "There shall be no system trails within zone 1."
- The "Backcountry Areas" designation is weak and inadequate. These areas should prohibit uses as stated in the Wilderness Act. Enforceable forest-wide amendments

should be included to protect key linkage areas, habitat connectivity and food security for grizzlies.

- Adopt a standard that does not allow domestic sheep grazing permits in bighorn sheep range. All grazing permits should require "let-down" fencing and remove barriers that impede migration of native species.
- Recommend wild and scenic designation for the 30 eligible rivers to protect riparian ecosystems. Please protect indigenous rights by preserving sacred areas in the Crazy Mountains, Pryor Mountains and in the Beartooth Mountains.
- A standard should close current allotments and not allow future cattle grazing in American bison range. Please make it a goal of this plan to retire grazing permits as they expire to protect and restore riparian areas.
- Create a forest-wide standard to protect habitat connectivity for American Bison

Thank you for the opportunity to comment. The Custer Gallatin National Forest is an American treasure.

Respectfully,  
*/Claudia Narcisco*