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Comments re: Custer Gallatin Forest Plan Proposed Action

Dear Ms. Erickson,

Thanks for this opportunity to comment on the Proposed Action for the Custer Gallatin Forest Plan.

I am submitting my comments supporting Alternative D.

In my 12 years here in Montana, I have spent most of my recreational time in the Custer Gallatin National Forest, of late, mostly in the Crazy Mountains. I have hiked, hunted, fished, camped, foraged, cross country skied, researched, and advocated for public access to our public lands. Through my Enhancing Montana's Wildlife & Habitat conservation work I have learned much of the history of the CGNF, the science of the species and environment, the history of the multiple uses of people through decades, a person could spend a lifetime and still be learning about the CGNF and its connection with the Great Yellowstone Ecosystem.

Despite all the awesomeness of the CGNF, Climate Crisis is getting worse, increasing faster than models project, now is the time to advocate for the diversity of wildlife (esp endangered and threatened), greater wildlife corridors, habitat diversity and watersheds, to preserve this amazing forest for future generations that you are tasked with.

BioPolitics:

Our public lands and public access is increasing under attack by privatization, especially under this Trump administration: abuse by mechanized recreational use that does not abide by Forest rules, continuing to encroach upon the Forest and by exploitation for natural resources. A strong, science-based, rule-of-law (regulations and policy) defended and conservation-oriented Custer Gallatin Forest Plan could defend against this intentional anti-conservation agenda and be a model for wise forest management.

Montana is the Treasure State and the Custer-Gallatin's best treasure are our wildlands and an invested public who care about these wild places, the life that depends on the land and water- clean water that issues from our breathtaking mountains. These treasures should not be exploited or taken for granted.

I am concerned the Forest Service Proposed Action favors motorized use, which gets an overall 43% in summer and 46% in winter while nonmotorized only gets 23% in summer and 20% in winter. Motorized recreation has a scientifically proven adverse impact on the land and

wildlife compared to nonmotorized. Your own 2018 Forest Service study, Elk responses to trail-based recreation on public forests, showed the disruption to radio-collared elk herds, with mountain bikes as disruptive as atvs. Foot traffic and horse having the least disruption on ungulate habitat security. Other studies have shown the adverse effect on the terrain.

I support limiting disturbance by a recommendation that 230,000 roadless acres of Wilderness protection be implemented by the CGNF; with seasonal closures within that Wilderness, to limit access to sensitive areas that wildlife need for giving birth to young, or for foraging just before denning (wolverine, grizzly). A management directive to limit all types of human intrusion in the Porcupine Buffalo Horn area during certain seasons would be appropriate. Again, I reference the Elk responses FS study.

Diversity/Habitat:

Please identify, map, analyze and disclose the true risks associated with planned management, especially when considered cumulatively with natural events, according to habitat type, not cover type, in the EIS. Inappropriate decisions are being made, often on a massive scale, when habitat type is either deliberately ignored or simply overlooked. Proper identification and mapping of habitat type should appear in the EIS and in every project level analysis after the ROD is signed, with no exceptions.

Where are the appropriate management standards that will protect aquatic ecosystem function and watershed health, native fish protection, connectivity and species viability; or the standards that will protect inventoried and un-inventoried roadless areas and wildlife linkage corridors from destruction; or the standards to protect habitat effectiveness by limiting road densities and promoting road obliteration/reclamation; or old-growth forest habitat standards that will protect old-growth-associated species viability? Standards are replaced with non-discretionary goals and objectives. These inadequate regulatory mechanisms will fail to implement Congress's intent to protect diversity.

Recommended Wilderness:

The revised Forest Plan violates NEPA by removing inventoried roadless areas without notifying the public. The revised Forest Plan subjectively disqualifies portions of uninventoried roadless areas and unroaded areas less than 5,000 acres for no apparent reason.

To properly inventory and categorize wilderness attributes the FS must utilize the Forest Service Handbook (2007). The handbook provides guidance for inventorying and identifying potential wilderness, including criteria that must be met. To qualify, the area must be either: 5,000 acres or more and contain no forest roads or "permanently authorized roads," or if it is less than 5,000 acres, it must be self-contained or contiguous to existing wilderness, and also contain no roads. "Wilderness characteristics" must still be used as the basis for analyzing roadless and unroaded areas. Today's definition, however, seem to have changed from the original "wilderness characteristics" so clearly defined in the Wilderness Act.

Where is the proper inventory of roadless areas? The purpose of revision is to take a fresh look, a "hard look" (NEPA), at portions of the forest that may be subject to irreversible and irretrievable loss due to "management." Simply accepting, with no new programmatic analysis, the 2001 "Roadless Rule" inventory, is unacceptable and wrong. A fresh, new

mapping effort, based on ground-truthed surveys is necessary.

Please also include (disclose) the congressional maps and analysis of the proposed designations in the Northern Rockies Ecosystem Protection Act (NREPA). This is currently the only active ecosystem/wilderness legislation addressing undeveloped forest areas being considered by the U.S. Congress for inclusion into the National Wilderness System. The bill is currently being considered in the U.S. House (HR 2135; 54 co-sponsors) and Senate (S. 936; 9 co-sponsors).

Two critical areas have been excluded from your recommendation – the Pryor Mountains and the Crazy Mountains. While I understand the checkerboard land issue,, there have been land consolidations, increasing the contiguous FS acreage of land with wilderness characteristics.

The Northern Rockies Ecosystem Protection Act (NREPA) of 2017, which I signed onto and advocated for, lists 159,000 acres in the Crazy Mountains, while the FS plan only documents 82,088 roadless acres; and this CGNF Proposed Action recommends no wilderness at all for the Crazy Mountains.

Likewise, the Bridger Roadless Area lists 44,945 in the Existing Designated Areas Report, yet no recommendation.

NREPA lists 48,000 acres in the Lionhead, but the FS recommendation of 17,983 acres in the new Forest Plan is less than half, yet the 1987 Forest Plan recommended 22,800 acres. Why the difference?

Cowboys Heaven should also get RW status, with about 39,300 acres unprotected roadless country.

Lost Water Canyon in the Pryor Mountains only gets 6,804 acres of Recommended Wilderness while the actual roadless area is 9,248 acres.

Madison Range

Cowboy's Heaven, a 17,000 acre roadless portion of the Madison Range provides necessary connectivity between the Beartrap Canyon and Spanish Peaks units of the Lee Metcalf Wilderness, this should be added to the Wilderness. I support the Recommended Wilderness addition of 4,466 acres to the Taylor Hilgard wilderness unit.

Gallatin Range

229,000 acres. Hyalite-Porcupine-Buffalo Horn Wilderness Study Area has protected about 155,000 acres since 1977. There are about 229,000 acres of potential wilderness, yet the CGNF has only recommended about 85,000 in two units.

Crazy Mountains

The CGNF recommended no wilderness in the Crazy Mountains despite identifying 90,690 acres as roadless. I ask that at least 90,690 acres be recommended for wilderness, pursuing potential land trades or purchases of inholdings. The Northern Rockies Ecosystem Protection Act of 2017 lists 159,000 acres in the Crazy Mountains.

Standards (FW-STD-GRAZ) I support in the Crazy Mountains, Alternative D: Use of targeted

grazing by domestic sheep or goats for weed control shall not be allowed. The Crazy Mountains are home to a significant Mountain Goat population, which could be jeopardized by the livestock diseases carried by domestic sheep and goats, such as the lethal *Mycoplasma ovipneumoniae*.

Standards (FW-STD-RECOG)

I support for the Crazy Mountains, Alternative D: Use of pack goats under new special use permits shall not be permitted. See above comment on livestock disease vector to Mountain Goat population.

2.4.40 Special Areas (SA) I support the inclusion of the Crazy Mountains in the Botanical and Paleontological Special Area for research and education.

2.4.41 National Natural Landmarks (NNL) I support Standard (FW-STD-NNL) 02 Extraction of saleable mineral materials shall not be allowed.

Suitability (FW-SUIT-EWSR) I support eligibility of Wild and Scenic Rivers of Big Timber Creek, as not suitable for timber production.

Absaroka Beartooth Wilderness Additions

Line Creek Plateau, 30,000 acres. The CGNF has recommended only 801 acres. 16,127 acres of high country is designated as the Line Creek Research Natural Area.

The West Fork and Lake Fork of Rock Creek and the Beartooth Front, 34,640 acres of roadless lands adjacent to add to the existing AB Wilderness T

The East Rosebud to Stillwater Roadless Area along the Beartooth Front, 25,000 acres.

Deer Creek drainage, 129,000 acres, including lands surrounding the East Boulder, Lower Deer Creek, Upper Deer Creek and Bridger Creek.

Chico Peak, Emigrant Peak and Dome Mountain, 56,000 acres.

Mount Rae, 5,000 acres

Tie Creek/Mission Creek/Livingston Peak/ Shell Mountain, 8,000 acres

In Paradise Valley, Deep Creek to Strawberry Creek, 13,000 acres.

Bridger Range

The Bridger Range, 45,000 acres in two pieces. The Bridger Ridge is beautiful high limestone ridge hosting migrating raptors and mountain goats. Bighorn Sheep have also been trying to cross into the Bridgers. It is a critical corridor for wildlife migrating between Greater Yellowstone and the Glacier/Bob Marshall ecosystem.

Blacktail Peak in the northern Bridger Range has about a third of this roadless component and should be recommended for wilderness.

Road Reclamation Priority:

The CGNF should re-launch their highly effective road reclamation project, which made substantial progress at closing and reclaiming logging roads in the Gallatin Range, but has not been as effective lately. There are 1,450 miles of roads across the forest, including 85 road bridges - some roads could be identified as superfluous and reclaimed.

Wildlife:

The CGNF Plan should implement and expand on the wildlife movement and connectivity program laid out in the Gallatin Travel Plan of 2006. Wildlife corridors, connectivity should be recognized, designated, and enhanced. Recent migratory data, such as the migration of Mule Deer in Wyoming, from the Red Desert to Jackson Hole and back, shows that wildlife are resilient and determined. With Climate Crisis, providing these corridors will be more critical to their survival.

Connectivity would involve establishing safe migration corridors for wildlife to and from different mountain ranges across highways and settled valleys, which has been implemented in other parts of Montana and the world with beneficial results. The 2012 Transportation Act, "Moving Ahead for Progress in the 21st Century" provides funding for mitigation measures to reduce wildlife-vehicle collisions via such structures as wildlife over and under passes.

The CGNF Plan should be consistent with long term conservation goals for wolverines, wolves, grizzly bears, lynx, and the increasing other threatened, endangered and sensitive species.

I feel it is short-sighted that the CGNF Proposed Action lists a handful of Species of Conservation Concern (others should be added): 25 plants, 3 animals and only 1 mammal (white-tailed prairie dog). The 2012 Planning Rule required the FS provide the ecological conditions (habitat) necessary to maintain a viable population of each SCC within the Plan area.

The Forest Service is required by the 2012 Planning Rule to plan for connectivity for wildlife habitat and to work across jurisdictions and ownerships to do so.

The best way to limit conflict between humans and wildlife and mitigate human disturbance of wildlife habitat is to limit human travel to non-mechanized, only foot and stock traffic. The Craighead Institute 2015 report stated, "Disturbance due to human activities reduces the amount of habitat available for us by wildlife, increases stress, and depletes energy reserves, thus reducing the carrying capacity of the habitat; the best habitat for wildlife is found in areas with the least human disturbance."

Concerning Elk, the same report also stated, "Elk increased their travel time during most during disturbance, which reduced time spent feeding or resting. Elk travel time was highest during ATV exposure, followed by exposure to mountain biking, hiking, and horseback riding. Elk reacted negatively to ATV traffic at distances of up to 1,000 meters and had a high probability of fleeing if they were near an ATV trail when ATVs were detected. It appeared that elk would habituate to horseback riding, but not to mountain biking."

The new Forest Plan needs to incorporate a plan to monitor recreation impacts on current and future wildlife areas and corridors starting with an overall monitoring effort to establish

baselines re recreation and wildlife patterns. Burying your head in the sand to avoid seeking answers to questions many have been asking is not management, it is irresponsible avoidance.

Bison should also be on the list of Species of Conservation Concern. They not have designated habitat in the Taylor Fork and the Upper Gallatin River. That would include the Tepee Creek on the Gallatin side, an obvious choice for bison restoration. Since, “there is forage for 1,177 bison year round or 2,354 bison for 6 months in the Madison, Gallatin and Absaroka Mountain Ranges”; and that most livestock grazing allotments have been phased out and closed (most of the remaining allotments in potential bison habitat are for horses) the new Forest Plan should consider restoring bison to the Taylor Fork, upper Gallatin, and possibly even upper Slough Creek/Pebble Creek areas.

Bighorn Sheep

Bighorns are under hellacious pressure on many fronts, needing protection as they cannot adapt to the threats posed by the livestock industry and mechanized recreation encroaching on their habitat. Two key populations – the Hellroaring and Monument Peak herds – are listed in the Wildlife report as under threat from snowmobile incursion into Wilderness. This is a threat that can easily be eliminated if the Forest Service seriously took Wilderness patrolling.

Wolverine

Wolverine are a Species of Concern in Montana and should be a Species of Conservation Concern for the CGNF. They are listed as “warranted but precluded” for Endangered status under the Endangered Species Act by US Fish and Wildlife Service. There are only 250-300 wolverines in the lower 48 states.

The Wildlife Conservation Society, in the 2006 Madison Valley Wildlife Assessment, found that protecting wolverine habitat also protected habitat for 151 other species.

According to the Wolverine Foundation, wolverines are probably not present in the Bridger Range, due to the relatively small size of the Bridgers which would provide a home range for only one male (pers. communication January 2018). But they were there in the 1990s-early 2000s (I tracked and photographed them) and may have since abandoned the range, perhaps due to intensifying recreational use. Wolverine habitat there should be protected.

There have been wolverine and their tracks sighted in the Crazy Mountains. Other parts of the CGNF provide habitat for wolverine which should be treated as a priority. They are most likely sensitive to climate change partly due to female denning requirements for deep snow in mid to late spring. Wolverines are also vulnerable to “incidental” (non-target) trapping for wolves and martens. The Gallatin Range and Bridger Range constitute part of the least-cost dispersal/migration corridor for wolverines going north to Glacier Park and Canada.

Climate Crisis:

The Forest Service has failed to analyze and disclose the effects of climate crisis in the CGNF. Forests currently store a considerable amount of carbon, which in turn offsets a percentage of the nation’s carbon dioxide emissions.

The actions outlined in the proposed alternative definitely will not store more carbon in

forests. All forest projects should be designed to remove atmospheric carbon. It is critical that the actions conform to rigorous scientific principles, that increases of stores be monitored and verified. We must also make sure that cumulatively, agency actions increase the role forests play in storing carbon.

Unfortunately, the revised CGNF Plan seems to not take the climate crisis into consideration. The Forest Service did not follow the best available science relating to the climate crisis, in violation of NEPA, NFMA and the APA.

All analysis should be scientifically-based, leading to sound management decisions that cause the least habitat damage, cost the least in taxpayer support and protect our public lands & waters, fish & wildlife and their habitat for future generations.

Thank you for the opportunity to comment on this FS Plan Revision.

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