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Comments:

See attached.

The Board of Sweet Grass County Commissioners (hereafter "SGCC") appreciates this opportunity to submit the County's comments on the Custer Gallatin National Forest Draft Plan and associated documents. The documents, appendices and various assessments are voluminous and we are cognizant of the substantial time and effort the Forest Service has put into the creation of these documents. As a preliminary matter, we note that it is very difficult to comment given the scale of this plan. We have reviewed thousands of pages of documents and still do not believe that they are specific or consistent enough to allow us to analyze the parameters of any given proposed alternative.

When Sweet Grass County re-wrote its growth policy in 2014, the Growth Policy included language that would allow the County to become a cooperating agency on federal land use planning endeavors in the County. SGCC did so with the hope that this would give the County and its citizens more voice and input into federal land use plans that have significant impacts to County residents and businesses. Therefore, when the Forest Service decided to update/rewrite the Custer Gallatin National Forest Plan, Sweet Grass County Commission requested cooperating agency status. As a part of that process, SGCC undertook a brief compatibility review of the County growth policy with the Draft Custer Gallatin National Forest Plan. Of course, this is very difficult to do as the Forest goals are so broad that little guidance in a goal is given to the actual plan chosen and whether an alternative would be compatible or incompatible with the County Growth Policy. This compatibility review would be more appropriate for a specific plan or alternative. However, our Growth Policy contains certain objectives that inform and guide our comments on this plan. Those objectives are set forth in the review of the Growth Policy in Appendix E, but include the following: protection of the agricultural base of the county and its agricultural resources; support for agricultural producers in their efforts to maintain brucellosis-free status; support for wildlife management and techniques that minimize conflict with agricultural operations; no net loss of private lands; control and containment of noxious weeds and coordination of noxious weed efforts with other governmental agencies and wildfire mitigation. A controlling principle is that Sweet Grass County's heritage of agriculture, mineral activities, timber, and tourism provides economic benefits and that the administration of natural resources should ensure the utilization and availability of the natural resources, in conjunction with sustainable preservation of the resource.

As part of our decision to elect cooperating agency status, SGCC has attended a number of Forest Service meetings on the plan, listened to webinars, received comments via email and telephone and held 4 of their own meetings in Sweet Grass County to solicit comments and input from the county residents and users of the National Forest. In addition, SGCC has set aside time on meeting days for concerned persons to drop by and tell the Commissioners their thoughts on the plan.

At the outset of these comments, Sweet Grass County would note that there are unique socio[shy] economic and heritage considerations at play in the two National Forest areas that are of primary interest to the County. Those areas are the Absaroka Beartooth Range and the Crazy Mountains, both of which have substantial lands that form a part of Sweet Grass County. National forest lands account for approximately 24% of Sweet Grass County's land base, Sibanye Stillwater Mine operates the East Boulder mine in Sweet Grass County and represents approximately 41% of the county's tax base as well as 20% of employment in the county; agriculture remains the dominant use in the remainder of the county as it has been, historically, and heritage ranching occurs on private lands surrounding the national forest as well as private inholdings within the national forest and particularly on checkerboarded lands in the Crazy Mountain range. Grazing allotments, outfitting, historic guest ranches, the Crow Tribal history and opportunities for dispersed and primitive or semi-primitive recreation exist in the Crazy Mountains while the Boulder river drainage provides outstanding fishing, recreational cabins, church camps, outfitting and guide services, varied recreational use and the largest platinum palladium mining complex in the United States. These uses co-exist and each adds to the economy of Sweet Grass County. We do not believe that the Socio-Economic Impacts of the various alternatives has been adequately addressed in this Draft Plan or the Assessment.

As the Commissioners reviewed the plan, listened to stakeholders and interested parties, we believed it beneficial to have a basic understanding of the laws which address management of national forest lands. We realize these are diverse but a certain theme seems to run through those laws that would make the Forest Service management distinct from other agencies such as the National Park Service which has more of a primary or dominant focus. We understand that the original purpose for which the Forest Service was established was to provide water and timber for the nation. In 1960, the Multiple Use and Sustained Yield Act added to these objectives, but directed the Forest Service to manage for multiple uses and sustained yields in renewable resources, and to assist and cooperate with state and local governments, private landowners and others to benefit non-federal rangelands and watersheds to improve those conditions in rural areas. In 1964, the Wilderness Act passed through a compromise that recognized and protected livestock grazing, gave further guidance to the Forest Service. We appreciate your efforts to comply with all these laws, as well as others not touched upon. SGCC believes that the multiple use concept is practical and necessary here in Sweet Grass County.

The Commissioners were unable to wholly support any alternative, instead highlighting elements from the various alternatives that Sweet Grass County does or does not support. Therefore, the issues are addressed as follows:

1. Wilderness: SGCC does not support further recommended wilderness areas, at this time.

1. SGCC doesn't feel that there has been adequate assessment of existing wilderness and its benefits or impacts, nor a demonstrated need for more wilderness. There are presently more than 30 recommended wilderness areas in Montana, seven of which are on Forest Service lands but Congress has not exercised its authority to designate those RWAs as wilderness. It was particularly noteworthy to us that, of the people who contacted the Commissioners or attended meetings and responded to the County's efforts to garner feedback,

not one expressed support for further wilderness designation. As noted in the Draft plan, a substantial portion of the Absaroka Beartooth geographic area is already wilderness. Comments received from the Sweet Grass

Recreation Association, landowners with inholdings or adjacent to the Forest, and permittees were not supportive of additional wilderness.

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1. In reviewing the criteria utilized by the Forest Service in their own assessment of recommended wilderness areas, SGCC does not believe that the Crazies are suitable for wilderness designation given the checkerboarded land ownership, the amount of land in grazing allotments, the outstanding mineral interests, and the fact that the Forest Service lacks boundary control in the Crazies. In fact, the Wilderness Assessment acknowledges grazing allotments in excess of 70,000 acres and approximately 38,000 acres or more of "outstanding subsurface mineral rights" in Crazies polygon 36, 37 and 38. In addition, the private land ownership within these boundaries would "make for excessively difficult management" as noted in the Forest Service assessment. While Wilderness designation is not supposed to result in reduction in livestock grazing, which is afforded some protection in the Wilderness Act and further addressed in the Congressional Grazing Guidelines, potentially impacted landowners and the SGCC are cognizant of efforts to eliminate livestock from wilderness areas and to challenge or change laws, as well as the practical effect that such a designation would have.

2. SGCC County supports a Stillwater Complex designation and has noted above the importance of mining activity and specifically the East Boulder Mine in analyzing socio-economic impacts to the County. As noted in the Minerals Resource Report, the Stillwater Complex "is a globally unique geologic feature contains significant amounts of commercially important locatable minerals which include platinum, palladium, gold, silver, copper, chromium, and rare earth minerals. Many of these minerals have been classified as strategic to the national interest and defense. The area is currently being mined for platinum and palladium mineral resources." On April 22, 2019 we attended a meeting hosted by the Forest Service. In discussing the alternatives, the Forest Service noted that mining would still continue under Alternative D. This is not clear in the draft plan and is misleading for the general public. Of course, a wilderness designation, as well as other designations could impact mining, but unless congressionally designated, we understand that the right of mineral entry still applies. The plan documents do not make this clear.

3. While the plan suggests that a wilderness designation doesn't affecting mineral interests or valid existing rights, in practice we know that it does. We have seen the loss of grazing leases and outfitting leases in the AB range, at least in part due to wilderness designation, grizzly bear recovery areas, and increasing bureaucracy.

4. Much of the Crazies are presently inventoried roadless areas. The private land ownership surrounding the Crazies and checkerboarded ownership pattern have preserved much of that range in a fairly untrammled condition. This is done without the designation of wilderness and the benefits of the natural environment, non-motorized and non-mechanized recreational use as requested by the Crow Tribe, primitive and semi-primitive experiences, and a habitat supportive of wildlife can co-exist with the historical grazing, outfitting and private land ownership that is an integral part of Sweet Grass County's history and heritage. Finally, SGCC is concerned with the impact of any wilderness designation on the issues of timber harvest and fuels reduction, and noxious weeds. These two issues are noted below as over-arching concerns with every alternative, as we believe they are not adequately analyzed or addressed in the Draft Plan.

2. Bison Management: It is our understanding that the interagency bison management plan, which was developed by state and federal agencies, sought to create a plan that (1) reduced the risk of brucellosis transmission from bison to cattle by keeping the animals away from each other; (2) maintained a wild, free-ranging bison population and (3) protected the economic interest and

viability of Montana's livestock industry. We do not believe that bison acres should be included in the Crazy Mountains or even areas of the Absaroka Beartooth planning area, unless these objectives can be maintained and the bison can be kept away from livestock. The distribution of grazing allotments throughout the Crazy Mountains should preclude bison in the Crazies as that separation cannot be obtained.

1. Wild and Scenic River Designations: SGCC would need more detail on the effects of any Wild and Scenic River designation. We are unaware of the risks that would be mitigated by the designation. SGCC also notes that the watershed area discussion in the draft plan identifies impacts from mining on the Boulder River and DEQ maintains a portion of the Boulder River on its TMDL list. Thus, the designation of a portion of the Boulder River should end at the present existing wilderness boundary; otherwise, such a designation seems incompatible and not warranted based on existing conditions, valid existing rights and anticipated use.

2. Bighorn Sheep: The County Commission does not have a thorough understanding of the issues surrounding Bighorn Sheep, which would affect the Absaroka Beartooth Range but not the Crazies, as we understand it, since there are no Bighorn Sheep found in the Crazies. With regard to the alternatives, we believe that grazing of sheep and outfitting and recreational packing of goats should undergo the same sort of risk management assessment. The use of sheep grazing for weed control should be allowed, subject to risk assessments and mitigation measures.

3. Grizzly Bear Recovery: It is unclear from the mapping where the boundaries are of "Secure grizzly bear habitat," "recovery zone", "bear management units and subunits" and "bear analysis units". As noted in the DEIS, the grizzly bear population in the Greater Yellowstone Ecosystem is "stable to increasing" and the bear has been proposed for delisting by USFWS. We are concerned by the statement in the DEIS that "although there is no estimate of the number of grizzly bears currently using portions of the Custer Gallatin National Forest, grizzly bears are present and well distributed ...". It seems that an estimate of the number would be a precursor to determining how the various geographic areas relate to the conservation and recovery goals, and how each area is managed. As the bears seem to be recovering well under the existing plans, Sweet Grass County supports Alternative A as it relates to Grizzly Bear recovery.

4. Backcountry areas: SGCC understands that the backcountry designation is new, and its practical impacts and benefits are not yet known. SGCC did hear feedback during its meetings that expressed concern the backcountry designation could simply be a pre-cursor to a future wilderness designation, which is not supported as discussed above. If backcountry areas protect current uses, allow for fuels reduction, timber management and weed control measures, preserve/enhance more primitive and non-motorized recreation use and tribal use of cultural and spiritual locations, and are in keeping with the operations and existing rights of checkerboarded private landowners and permittees, then perhaps such a designation might be appropriate for portions of the Crazy Mountains. However, SGCC questions the need for such a designation. This sort of use/management pattern already exists but with any designation there appear to be restrictions or exceptions, which make it difficult to understand exactly what the resulting management would look like or the associated benefits and impacts.

5. Areas of Tribal Importance: SGCC has read the letter from the Crow Tribe with regard to the Crazies and notes that the Tribe doesn't actually request wilderness designation but rather restrictions on mechanized and motorized recreational access. Whether wilderness designation would benefit or impair tribal interests is not clear. There is discussion of creation of a "Traditional Cultural Landscape District", but no explanation of what that means. SGCC would

be interested in meeting with the Forest Service, Tribal representatives and private landowners in the Crazyes to work together on this issue or any other that affects their respective interests.

1. Land Use/Ownership/Access: Although the plan contains few details on these issues, Sweet Grass County is supportive of the private landowners adjacent to and with inholdings in the national forest, or those holding mining claims and mineral estate interests, and believes management plans must evaluate impacts of alternatives on these interests as such impacts often go to livelihood. The Commissioners believe that any additional access to national forest should be pursued through voluntary measures with willing landowners.
2. Boulder Corridor Recreation Emphasis Area: SGCC would be supportive of a recreation emphasis area, as long as it considers impacts to private interests and addresses obligations for infrastructure maintenance and facilities. Of course, an ongoing concern with new trails, roads or increased recreation is the Forest Service maintenance backlog. SGCC is aware that Forest Service budgets can literally be consumed by fire-fighting measures, although Congress has recently provided some relief . Any REA should include an agreement on how it is to be funded and managed.
3. Timber Harvest/Fuels Reduction/Wildfire: SGCC is concerned with the Forest Service ' s difficulty in actually permitting and completing timber harvest and fuels reduction. We understand that these issues are often tied up in litigation, but responsible land management dictates timber harvest and fuels reduction in order to create resilient and sustainable landscapes. Climate change is having a significant impact on the resource, with drought, beetle infestations, and increased intensity and frequency of fires. A US Department of the Interior blog post from 2017 recognizes that 90% of forest fires are human caused . "Research estimates that 90 percent of wildland fires in the United States are caused by people. Some human-caused fires result from campfires left unattended, the burning of debris, and intentional acts of arson. It can also be caused unintentionally by heat and sparks from vehicles and equipment." Therefore, it is incumbent on the land management agency to address and mitigate these risks.

The fire risk increases with additional recreational uses and mitigation measures are stalled by litigation or a desire to maintain a "natural environment." Air quality has been abysmal in recent fire seasons, and that impacts humans and wildlife. While we note that wildfire is considered a natural occurrence in this Plan, and thus exempt from air quality standards, the increased intensity and duration of forest fires and not engaging in fuels reduction begs the question of whether air quality standards should apply. The risks of catastrophic fires to private land are also exacerbated by the failure to manage public land risks. There needs to be much better cooperation and coordination among agencies (state, federal and local) on wildfire control measures and fuels reduction. Sonny Purdue, Secretary of Agriculture , has mentioned the importance of partnership and stewardship, including the "good neighbor authority," approved by Congress in 2014, which allows states to undertake forest management activities , including logging projects, on national forests with the Forest Service's permission . Perhaps it's time to really implement this idea.

1. Weed Control: Noxious weeds were of particular concern to SGCC and the issue that garnered comments from our own county employees, the County weed board member and private landowners. Weed control within the forest is seriously deficient. We have been reviewing thousands of pages of draft plans that give short shrift to the single issue that likely impacts all other considerations the most, including wildlife, ecology, grazing, recreation and so forth. In an article entitled Whats the Big Deal with Noxious Weeds, by John Councilman, retired US Forest Service employee who worked for decades in vegetation and wildlife management. He said "I

have seen landscapes recover from every major calamity except invasive species." His article noted that weeds "spread easily via cars, ATVs, motorcycles, dogs, heavy equipment, livestock, hiking boots, clothing, fishing waders, etc. and thrive in areas that are burned." This litany encompasses just about every alternative contemplated, as well as the risk of wildfire.

The idea that the Forest Service intends to treat only 4,000-5,000 acres per year, in a landscape of this size, is unjustifiable regardless of budget considerations. In reviewing the potential wilderness areas, private landowners noted the incredibly low numbers of noxious weed acres.

The Forest Service planning documents note that there has been no substantial noxious weed assessment. Again, this seems to be a precursor to any other plans and alternatives as every single alternative and landscape is impacted by this issue. Finally, SGCC expresses our concern that the consolidation of the Forest, budgetary constraints, the reduction of Forest Service offices and employees in rural areas and the focus on the desires of distant, larger populations has resulted in the loss of hands-on knowledge of areas to be managed. Our County Noxious Weed Board, Road Department, Volunteer Fire Departments and Law Enforcement have all noted that the closure of the local office has been detrimental to shared objectives and coordination of efforts. We would hope that the agency will work with state, local and private partners to address the issues of fire, fuel loads and weed control, which will have irreversible impacts to the Custer Gallatin National Forest.

Thank you again for the opportunity to comment and we hope that SGCC's comments will assist in determining alternatives or components of various alternatives, as you undertake the serious and significant decisions ahead.