



PO Box 200701  
Helena, MT 59620-0701  
(406) 444-3186  
FAX: 406-444-4952  
Ref: DO129-19

June 6, 2019

Custer-Gallatin National Forest  
Attn: Forest Plan Revision Team  
PO Box 130  
Bozeman, Montana 59771

RE: DRAFT CUSTER GALLATIN FOREST PLAN REVISION AND DRAFT ENVIRONMENTAL IMPACT STATEMENT- COMMENTS

Dear Forest Plan Revision Team Leader:

Montana Fish, Wildlife and Parks (FWP) thanks you for the opportunity to provide comments on the Custer Gallatin National Forest *draft Forest Plan Revision* (draft Plan). FWP fisheries, wildlife, and parks staff have been closely following the forest plan revision process. We submitted comments on an earlier version of the draft Plan on March 5, 2018.

On reviewing the current draft Plan and comparing it to the previous draft, it appears that few of our original comments were incorporated into this version. Some of those comments were simply correcting factual errors (e.g., removing the Gallatin River from the list of waters in the Absaroka-Beartooth Mountains). Observing these same factual errors in the current draft Plan leads us to request a careful consideration of our comments. We are resubmitting many of our earlier comments for this reason, as well as several additional comments. We hope that you will consider them in detail during the development of the final Forest Plan. To be clear, while some of our comments address factual errors, others offer more substantive content, such as including elk security to which the USFS and FWP have recently co-developed habitat management recommendations with several Forests involved, including the Custer and Gallatin.

FWP appreciates the work of the Forest Plan Revision Team and encourages continued collaboration and partnering with the U.S. Forest Service (USFS) on issues that could impact fish and wildlife and their habitats, and recreational opportunities. FWP staff is happy to meet early and often on topics we can be of assistance on, as well as to learn about multi-use USFS planning. With several USFS planning efforts under way, we are also interested in and advocate for joint FWP-USFS discussions that might reasonably leverage or restate collaborative efforts and products from one Forest Plan into another.

We look forward to continuing our productive working relationship with local USFS staff. Please contact Linnaea Schroeer, at (406) 444-3378 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martha Williams", with a long, sweeping horizontal line extending to the right.

Martha Williams  
Director

cc: Mary Erickson, Supervisor, Custer-Gallatin National Forest  
Mark Deleray, Supervisor, FWP Region 3  
Barb Beck, Supervisor, FWP Region 5  
Brad Schmitz, Supervisor, FWP Region 7

## **GENERAL COMMENTS**

- A. Montana's State Wildlife Action Plan (SWAP; 2015) should be consulted regarding Species of Greatest Conservation Need (SGCN), Community Types of Greatest Conservation Need (CTGCN), and Focal Areas. *The MTFWP Statewide Fisheries Plan 2013-2018* was recently updated by the *MTFWP Statewide Fisheries Management Program and Guide 2019-2027* and provides management objectives of fish including those on Forest Service lands. These documents provide guidance on management of waters and watersheds which specifically relate to the draft Plan.
- B. Montana's Statewide Comprehensive Outdoor Recreation Plan ([SCORP](#)) should be consulted. SCORP is the state's guide for outdoor recreation and conservation management. It creates a recreation roadmap for improving the quality of life for residents with consideration of sustained economic benefits and opportunities to communities, balanced with ensuring that there are functioning fish and wildlife habitats, now and into the future. The 2019-2024 SCORP report is currently in the process of being drafted and should be available by December 2019.
- C. We believe that many of the Desired Conditions are not described in terms specific enough to understand when they are achieved. Per the U.S. Forest Service's (USFS) 2012 Planning Rule: "Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined ...."
- D. The draft Plan does not provide enough details on how the Forest will pursue and use comprehensive planning to effectively manage recreation and potential impacts to wildlife security and habitat. This is particularly an issue in the Bozeman area, a growing community with high participation in year-round front and backcountry recreation. The Gallatin and Bridger mountain ranges are the most heavily impacted, and the Crazy and Absaroka-Beartooth mountains are also seeing impacts to wildlife security from increased user days and recreational activity in remote areas year-round. Backcountry recreation in particular has high potential to impact habitat security and survival for ungulates, including bighorn sheep and mountain goats in alpine areas, as well as elk and deer in the mid and lower elevations. FWP recommends the CGNF address how they will manage the competing priorities of providing recreational opportunities and maintaining a diversity of wildlife on the landscape.
- E. More detail is needed on how the Forest will respond to and manage new and emerging types of recreation, such as the use of drones, tracked motorcycle conversions, and fat-tire bikes.
- F. Funding: We understand that there are many funding limitations for public land management agencies; however, we encourage the CGNF to continue finding ways

to fund the maintenance and development of recreation opportunities in the forest and will continue to serve as a partner.

During the 2019 legislative session, SB 24, one of the first broad-based recreation funding measures in the state of Montana was passed. It will create a state trails program (termed Made in Montana) to support additional outdoor recreation infrastructure and trail-related needs. Additionally, HB 355, which was also passed in this most recent session, will establish a summer motorized recreational trail grant program and a recreational trail pass for residents while also revising non-resident temporary use snowmobile permit fees and trail pass fees. We are in the process of determining our role as it pertains to implementation, outreach and education of these opportunities. Federal agencies are eligible for grants under SB 24 and NGO partners are eligible to receive grants for work on federal land under HB 355.

- G. Access to natural landscapes, outdoor recreation, and time spent in open space have all been documented to provide numerous health benefits, including: improved physical and mental health; greater awareness of environmental concerns and stewardship principles; and, improved community interactions between residents, neighbors, and visitors. We support the Forest Service's effort in striking a balance between promoting outdoor recreational opportunities and time outdoors with concerns centered around protecting and preserving fish and wildlife and their habitats.

## **Specific Comments on Revised Forest Plan**

### **CHAPTER 2. PROPOSED FORESTWIDE DIRECTION**

#### **2.3.4 Watershed, Aquatic, and Riparian Ecosystems; p.21**

**Comment:** As in our previous comments, we respectfully ask that you reconsider listing Arctic Grayling and Yellowstone and Westslope Cutthroat Trout as Forest Service Species of Conservation Concern. These are state Species of Concern (SOC) and are included in Montana's State Wildlife Action Plan (SWAP) and FWP's Statewide Fisheries Management Plan (2013) as SOC. They have been included as sensitive species in past working documents within the USFS. Although many miles of historic habitat are occupied by cutthroat, very little area is secure from anthropogenic and natural threats. A Memorandum of Understanding (MOU; FWP 2007) is in place for current management with partners including the USFS. Past collaborative efforts with those partners, including USFS, have improved conditions but the stability of populations has not risen to levels indicating their status should be changed. Habitat enhancement within the CGNF is critical to improve conditions for Yellowstone Cutthroat Trout in the Upper Shields, Beartooth, and Pryor Mountains.

Furthermore, in the document it is stated "The most prevalent negative effect on montane watersheds were nonnative species displacement of native salmonids." The current and continued displacement of native salmonids by nonnative species further warrants their listing as species of special concern.

**Comment:** We recommend including reptile and amphibian species that are identified as Species of Greatest Conservation Need (SGCN) in SWAP. Management activities and habitat management guidelines should also be included for these species and species groups.

**Comment:** Add planning considerations for the newly included western pearlshell mussel. The decline in cutthroat populations has likely contributed to declines in western pearlshell populations. The draft Plan should reference the working plans, MOU, and recovery strategies (e.g., Spoon and Canfield 1999) for the western pearlshell.

**Comment:** Specifically mention the importance of popular sportfish recreational opportunities provided by mountain lakes and streams. FWP manages fisheries, mostly notably salmonid fisheries, within the boundaries of the Forest. Fish are indicators of ecosystem health, and as such, habitat should be conserved for all species of fish.

**Comment:** The *Montana Fish, Wildlife & Parks Statewide Fisheries Program and Guide* outlines future management of native and nonnative fisheries. This document should be referred to for general fisheries management.

### 2.3.5 Watershed and Aquatics (WTR)

Desired Conditions p. 23

**Comment:** Add language to the effect of: Ecosystems should be kept free of invasive species and their impacts. Species include bullfrogs, zebra mussels, quagga mussels, Eurasian watermilfoil, New Zealand mud snails, and illegal introductions of other aquatic species.

Desired Conditions 09 p. 23

**Comment:** Add that engineered devices be encouraged on roads and culverts to prevent beaver damage rather than lethal removal.

Goals 01 p. 23

**Comment:** We are pleased to see the acknowledgement of the importance of working with other agencies to reintroduce native species on the Forest. We would request that additional language be added addressing cooperation with

other agencies to also conserve existing populations of native species on the Forest.

Objectives p. 23

**Comment:** This objective is to increase habitat for at-risk species. This supports listing cutthroat and Arctic Grayling as at-risk species in the CGNF and elsewhere and for reviewing the projects with FWP and other principal agencies.

Standards 02 p.25

**Comment:** We would like to see the language of this standard changed to exclude "unless site conditions or lack of resource values preclude the installation of a structure that size". Stream form and function are an important resource value to not only the immediate area but to downstream waters and should be used as justification to install appropriate structures and not allow under-sized crossings to be installed. Under the same reasoning, we request that this standard be extended to non-fish bearing streams as well, given that these waters almost always eventually flow to and support fish-bearing waters.

**Comment:** Reference and validate the long-standing agreement whereby the USFS follows the State of Montana 124 permitting process for review of stream bed and bank projects. The process can continue to inform planners of proposed projects and site-specific concerns related to sensitive species or aquatic habitats. Past annual meetings among FWP and USFS staff helped facilitate 124 review and should be established again.

Guidelines p. 25

**Comment:** Include actions to inform users how to prevent movement of aquatic invasive species. Address management actions that will be taken if detections occur. Include guidelines for movement of water and equipment for firefighting, ensuring any staging of fuel or other chemicals follow Best Management Practices (BMPs) to prevent spills.

**Comment:** Include a specific timing restriction (May 1-July 15, unless otherwise noted in the SPA 124 Permit) for activities that could impact cutthroat spawning and incubation.

### 2.3.6 Riparian Management Zones;

Table 3 page 27

**Comment:** In table 3, there is no outer riparian management zone for Category 2: perennial and intermittent non-fish-bearing streams. We request that an outer riparian management zone be provided for non-fish bearing streams at the same distances for fish bearing streams. Protection of riparian areas are important

regardless of the presence of fish. Non-fish bearing waters typically connect to fish bearing waters and can provide many benefits to downstream waters, especially considering current climate and flow changes. RMZ boundaries should be set based on stream function and not fish presence. Cumulative effects analyses have demonstrated good management of all riparian areas is important to support aquatic health, regardless of species presence or absence. This concept is supported by Desired Conditions 01 and 02 on page 26 and Desired Conditions 01 and 03 on page 71.

Riparian areas serve as filters and can store water. Diverse vegetation in these areas provide shade that can keep water temperatures cool. These functions are extremely important in late summer when clean, cool water can be in short supply in the lower reaches of watersheds. Protection of these areas allows for succession of plants, providing long-term persistence. Functional riparian areas can provide bank stabilization, reduce erosion, and limit sedimentation, thus reducing the potential of having to address total maximum daily load (TMDL) issues. At a minimum, the outer riparian management zone for non-fish-bearing streams should be placed at 50 feet to meet the protections provided to Category 3 and 4 waters.

Standards 04 p.28

**Comment:** We request that for Standard 04, clarification be added to include the exclusion of oil and gas extraction from riparian areas as well.

Guidelines p.28

**Comment:** We request that an additional Guideline be added to this section. We recommend a guideline addressing improvements to existing roads and crossings to reduce sediment inputs from these existing sources.

### **2.3.7 Conservation Watershed Network (CWN) p.29. See also Appendix C**

Objectives 01 p.29

**Comment:** While we agree with addressing sediment sources from the roads system in Conservation Watershed Networks, we request the inclusion of addressing sediment sources from grazing practices as well.

### **2.3.14 Invasive Species (INV)**

Guidelines (FW-GDL-INV-02); p. 54

**Comment:** Add a guideline to read as follows: The MT FWP Bighorn Sheep Conservation Strategy (FWP 2010; p. 53) regarding the use of domestic sheep/goats for weed control should be consulted prior to implementation.

### **2.3.15 Wildlife (WL) p.55**

**Comment:** We recommend using the MT SWAP (2015) or the Montana Natural Heritage Program to identify Species of Greatest Conservation Concern (SGCC) in Montana and including these in the list of the Forest Service's Species of Conservation Concern. For example, there are multiple reptile and amphibian species including the western toad, western hog-nosed snake, milk snake, and Great Plains toad that are identified as SGCC and have been observed on the CGNF.

**Comment:** Does the USFS use Forest Indicator Species still? If so, Northern Goshawk and American Marten should be addressed.

Desired Conditions (FW-DC-WL) p.56

**Comment:** Add the following Desired Conditions:

- a. Population numbers of wildlife species are within state wildlife agency management objectives and within traditional population ranges. The social, economic, and ecological value of large ungulates on public land is too complex to be managed simply for "diversity". Multiple research projects have been conducted in partnership between FWP and the USFS over the past decade and they provide specific guidance and management recommendations for many species. The insights and recommendations gleaned from those documents should be incorporated into this plan and in future management decisions.
- b. Elk and other big game species are available on CGFS lands to hunters during both the archery and rifle hunting seasons. Suitable secure habitat, forage, cover, and areas devoid of open motorized routes are available to maintain species presence and distribution on CGFS lands during increased human use (i.e., during the archery and rifle seasons).
- c. Management of habitat for native ungulates (elk, deer, moose, bighorn sheep, and mountain goat) is consistent with management of similar habitat on adjoining state or federal land, where such management aligns with population management goals for these species set out by state wildlife agencies.
- d. Native and desired non-native species are available on CGNF for a variety of nonhunting recreational opportunities such as viewing and photography.
- e. Diverse opportunities exist for hunting, trapping, wildlife viewing, fishing, and other fish and wildlife-related recreation on CGNF lands.
- f. Levels and types of hunter or trapper access is balanced with desired conditions for wildlife populations and habitat security.



- g.** Winter range for ungulates and other wildlife species that are sensitive to human disturbance is relatively free of human disturbance during the periods and areas in which those species are active.
- h.** Nest sites, den sites, and other birthing and rearing areas for terrestrial wildlife species (including avian species) are relatively free of human disturbance during the period they are active in those sites/areas.

Goals (FW-GO-WL) p.56

**Comment:** Add the following goal: Cooperative meetings among Forest Service and Montana FWP biologists occur annually, to evaluate management direction for wildlife and habitat on NFS and adjoining lands, and to recommend potential adjustments to management in order to maintain or improve wildlife habitats.

**Comment:** Add the following goal: In order to create security areas on public lands during archery season, manage for areas with  $\geq 13\%$  canopy cover that are  $\geq 2760$  m from motorized routes and identify and manage for areas of high nutritional resources within these areas. During the rifle season, manage for areas with  $\geq 9\%$  canopy cover that are  $\geq 1535$  m from motorized routes and are at least 5000 acres. Lastly, given increased elk avoidance of motorized routes with higher hunter effort and in order to maintain elk on public lands, we recommend increasing the amount of security habitat in areas that receive high hunter effort (Ranglack et al. 2016a).

Standards (FW-STD-WL) p.57

**Comment:** We recommend adding the following standards:

- a.** Elk summer habitat management recommendations on public lands should be included in the draft Plan. The following recommendations are found in Ranglack et al. (2016b).
  - The current elk summer habitat management paradigm based on managing motorized route density to maintain elk habitat effectiveness (Lyon 1983) should be expanded to also consider nutritional resources.
  - Managers should use, as an assessment tool, time integrated NDVI to identify areas of optimal nutrition (i.e., values  $\geq 66$ , free access at [http://phenology.cr.usgs.gov/get\\_data\\_250w.php](http://phenology.cr.usgs.gov/get_data_250w.php)). This product is also available through the FWP mapper system.
  - Managers should assess the relationships between time integrated NDVI and existing vegetation mapping products (e.g., R1VMAP) to determine the types of areas within their jurisdiction that contain optimal NDVI values (i.e., values  $\geq 66$ ). High values should be evaluated with respect to fire, grazing, weed treatments, etc. to help

managers understand the relationships between management actions and summer range elk nutrition.

- Managers should continue to provide consideration for maintaining low open motorized route densities on elk summer range, especially in areas of poor nutritional resources (as indexed by time integrated NDVI values  $\leq 46$ ).
  - Habitat management recommendations should be based on regional models constructed from multiple populations and should use caution when extrapolating resource selection inferences based on a single study population to other populations.
- b. In order to influence elk distribution on USFS lands, management actions should not reduce the amount of elk security available during the archery and rifle hunting seasons over the long-term (generally ten or more years). Spring and summer management of elk habitat and elk forage are equally important to maintaining elk on public lands as fall management.
- c. Elk security should be defined and applied at a scale that is informed by interagency recommendations if available, knowledge of the specific area, and the best available scientific information. Elk security may be achieved through actions such as restrictions on motorized access, maintaining or improving hiding cover, adjusting domestic livestock grazing, or other methods as determined by site-specific analysis. This approach is consistent with, and supported by, the best available scientific information.
- d. Techniques for managing habitat for elk and other big game species outlined in the 2013 document coauthored by the USFS and FWP will be utilized (FWP and USDA Forest Service 2013). This provides a collaborative overview and recommendations for elk habitat management specific to the CGNF. This document specified that management actions be analyzed at the scale of the Elk Analysis Unit (EAU).
- e. Management activities that occur on winter range during the winter period should concentrate activities in time and/or space to reduce impacts to native ungulates. Timing restrictions should be based on the best available information, as well as on site-specific factors (e.g., topography, available habitat).
- f. New fencing installation or reconstruction should be sited and designed to minimize hazards to wildlife and barriers to wildlife movements, and old fencing should be removed.
- g. New or reconstructed water developments or impoundments should be designed to prevent animal entrapment and to facilitate animal escape.

Guidelines (FW-GDL-WL) 05 p. 58

**Comment:** Add: Consult National and State recommendations for temporal and seasonal restrictions.

**Comment:** Add: Consult National and State recommendations for bald and golden eagles.

**Comment:** Breeding season of raptor species should be referenced here.

Golden Eagles – January through August

Bald Eagles- February through August

Burrowing Owls – March 15-July 31

Most other Raptors – March 1 through July 31

Bats (WLBAT)

Guidelines (**Guidelines (FW-GDL-WLBAT) p.59**)

**Comment:** Northern Long-eared Bat guidelines should reflect that FWP captures lactating females in August. The breeding season should therefore be changed to June 1-August 31.

**Big Game (WLBG)**

Desired Conditions (FW-DC-WLBG) p.59

**Comment:** Add additional Desired Condition: Big game harvest opportunities on CGNF lands support FWP's population and harvest objectives.

**Comment:** Add new Desired Condition: Big game species remain on NFS lands throughout the archery and rifle hunting seasons at levels that support FWP recommendations regarding big game distribution, population size and composition, harvest levels, and harvest opportunity.

**Goals (FW-GO-WLBG)**

**Comment:** Remove the phrase "high quality hunting experiences". This phrase has many different, often contradictory, meanings to different people and is not defined in this document. Replace with "hunter harvest".

Guidelines (FW-GDL-WLBG) 03 p.60

**Comment:** Replace existing guideline with the following: Prior to management actions that would increase or change the location, timing, mileage, or density of wheeled motorized routes open during the archery and rifle hunting seasons, FS biologists should coordinate with FWP biologists to identify possible management actions that may reduce the potential for displacement of big game species from

NFS lands during the archery and rifle hunting seasons. Possible management actions may vary on a project-specific or local basis, and should be based on the best available scientific information (such as that described in the *U.S. Forest Service and Montana Department of Fish, Wildlife and Parks Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests*, 2013 or subsequent versions; see also Appendix C, section titled "Elk and Other Big Game Species").

### **Bighorn Sheep (WLBHS) p.60**

Desired Conditions (FW-DC-WLBHS) p.60-61

**Comment:** Add new Desired Condition as follows: Maintain hunting opportunities that support FWP management goals and recommendations of population numbers, distribution, and harvest opportunity.

### **Grizzly Bear (WLGB) p. 64**

**Comment:** FWP supports the desired conditions, objectives, standards and guidelines pertaining to secure habitat, developed sites, livestock grazing allotments, and key food sources that apply the Primary Conservation Area (PCA)/Recovery Zone (RZ) and have been formally adopted in the updated 2016 Yellowstone Grizzly Bear Conservation Strategy.

### **Objectives (FW-OBJ-WLGB); p.65**

**01** FWP is supportive of the objectives outlined in Alternatives B and C regarding grizzly bear relocation sites.

### **Standards (FW-STD-WLGB); p. 67**

**06** FWP is supportive of the standards outlined in Alternatives A, B and E in the use of targeted grazing by domestic sheep or goats for weed control and the associated stipulations regarding grizzly bears.

### **Wolverine (WLWV)**

Guidelines (FW-GDL-WLWV) p.70

**Comment:** We recommend adding the following guideline: Management actions in maternal habitat for wolverines should avoid disturbance during the wolverine reproductive denning season (mid-February through mid-May).

## **2.4 Benefits to People: Multiple Uses and Ecosystem Services**

### **2.4.5 Permitted Livestock Grazing (GRAZ) p.74**

**Comment:** Risk assessment of areas that currently do not have bighorn sheep should be used to consider and map the habitat potential for bighorns to be

present in the future, either from natural colonization or transplant. Where that habitat potential exists, the risk assessment should determine if introduced domestics would essentially preclude any opportunity for separation to be an available management option if bighorns colonized or were transplanted into the area. This approach is consistent with the Montana Bighorn Sheep Conservation Strategy as it speaks to honoring and respecting existing allotments and also how FWP should “vigorously” defend against recognized threats to bighorns or their habitat. Risk assessments should be further clarified as to how they would be conducted and by whom, what they would consider, and where in overall process they would be conducted.

#### Standards (FW-STD-GRAZ)

**Comment:** *The Montana Bighorn Sheep Conservation Strategy (FWP 2010)* should be consulted and recommended actions be put into place to evaluate and monitor any domestic sheep/and or goat grazing in the CGNF. There is no discussion of domestic sheep or goat grazing in occupied grizzly habitat in this section.

**Comment:** The Western Association of Fish and Wildlife Agency publication *Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat 2012* should be used to develop Best management Practices for domestic sheep and goat management in wild sheep habitat.

#### Guidelines (FW-GDL-GRAZ)

**Comment:** Develop a measurable target value that is biologically defensible for all riparian areas subject to livestock grazing. These targets may be similar to allowable activities and disturbance listed in RMZ setbacks. FWP supports grazing as an allowed activity within riparian zones, provided it is monitored and issues are addressed.

### Timber (TIM)

#### Standards (FW-STD-TIM) p.81

**Comment:** Timber harvest should consider the presence of bald and golden eagle nests, and follow all recommendations pertaining to spatial and temporal buffers for those species. The benefits of leaving snags and woody debris should be addressed.

### 2.4.8 Energy, Minerals, and Geologic Areas of Interest (EMIN)

#### Desired Conditions (FW-DC-EMIN) 05 p. 85

**Comment:** More detail is needed to reiterate safe practices and decontamination procedures for bats and white-nosed syndrome. Follow all recommendations related to bat winter security during hibernation.

Guidelines 02 p. 87

**Comment:** This guideline directs the protection of water and riparian resources as part of mineral development. This is an important issue and not only deserves a guideline but a standard as well to protect these valuable resources.

## **2.4.9 Infrastructure—Roads, Trails, Facilities, Airfields, and Dams**

### **2.4.10 Roads and Trails (RT)**

**Comment:** We offer the following general observations and recommendations regarding Roads and Trails:

- **Tracking and monitoring:** We support the Forest Service's efforts to track and monitor recreational demands related to the CGNF area to enable making informed adjustments to travel plans that are consistent with fish and wildlife resource needs.
- **Visitation impacts:** In just the Gallatin county area alone, the CGNF will likely see thousands of additional residents in search of hiking trails, equestrian trails, interpretive sites, camping and picnicking opportunities, trail and mountain biking, rock climbing, off-road use and hunting opportunities. In the winter, there will be an increased need for cross-country skiing, snowmobiling, and ice-climbing. In addition, there will be those residents that look to the forest for serenity, bird watching, photography, and other non-consumptive activities.
- **Comprehensive planning:** As such, we support and encourage the Forest Service in having a comprehensive and mixed-use plan to effectively manage and respond to these additional demands.

Desired conditions (FW-DC-RT) 01 p.88

**Comment:** We recommend making the following change: The transportation system and its use have minimal impact on resources included threatened and endangered species, species of concern, and critical seasonal ranges for mule deer, elk, bighorn sheep, and grizzly bears.

Objectives (FW-OBJ-RT) p.89

**Comment:** we are supportive of the following alternatives:

- Objective 01 (FW-OBJ-RT) – *Annually maintain high clearance vehicle roads.*

- Objective 02 (FW-OBJ-RT) – *Annually maintain passenger vehicle clearance roads.*
- Objective 03 (FW-OBJ-RT) –Where there are no significant impacts to fish or wildlife and their habitat, we would encourage the Forest Service to consider alternative uses for the identified unneeded system roads; or, re-routing such roads where deemed appropriate and in alignment with visitor usage trends and fish and wildlife and their habitat.
- Objective 04 (FW-OBJ-RT) – *Annually maintain trails to standards, emphasizing areas of higher use.*
- Objective 05 (FW-OBJ-RT) – *Annually maintain trails.* Additionally, we support opportunities for creating more trails where there is merit per demand and there are no significant impacts to fish and wildlife and their habitat. Working closely with FWP biologists can help in suitability assessments.

Standards 01 p.89

**Comment:** We recommend that the term "indirectly" be added to this standard so that it reads "During dust abatement applications on roads, chemicals shall not be applied directly or indirectly to watercourses, water bodies (such as, ponds and lakes), nor wetlands. "

**Comment:** We recommend adding "seasonal road closures maintain or enhance wildlife use of critical seasonal ranges."

Standards 04 p. 89

**Comment:** We request that "or significantly impact the streams or riparian areas in the short term" be added to the end of this standard.

Objective 01 (FW-OBJ-FAC) p.91 *Annually maintain administrative facilities.*

**Comment:** We support this objective.

## 2.4.12 Airfields, Aircraft Landing Strips (AIRFIELDS)

Standards (FW-STD-AIRFIELDS) p.92

**Comment:** Are there restrictions on aerial sightseeing tours? If so, they should be addressed here. FWP provided comments in the past regarding potential disturbance of wildlife (e.g. elk calving areas, grizzly bears, nesting raptors).

Objective 01 (FW-OBJ-ROSP) p.98 – *Sign areas of wilderness and recommended wilderness boundaries near adjacent motorized settings at an appropriate rate of replacement to better inform visitors of motorized restrictions within this primitive setting.*

**Comment:** We support this objective.

Objective 02 (FW-OBJ-ROSP) p.99-*Eliminate existing unauthorized motorized travel incursions as they are detected.*

**Comment:** We support this objective

Objective 01 (FW-OBJ-ROSSPNM) p.99- *Eliminate existing unauthorized motorized travel incursions as they are detected.*

**Comment:** We support this objective

Objective 01 (FW-OBJ-ROSRN) p.100 – *Improve accessible designs at sites, such as toilets at trailheads or interpretive opportunities at an appropriate rate of replacement for damage or message adjustment.*

**Comment:** We support this objective

*Objective 01 (FW-DC-LAND) p.135 – When opportunity arises, acquire new roads or trail rights-of-way that are needed as high-priority access or would fill a gap in existing access to public lands.*

**Comment:** We support this objective

## **Pryor Mountains Geographic Area**

Goals (PR-GO-WHT) 02 p.154

**Comment:** We recommend changing this section to read as follows: The Forest Service coordination with the Bureau of Land Management and other Federal and State agencies will continue to maintain or enhance wild horse numbers in a manner that is compatible with maintaining or enhancing wildlife habitat and population numbers.

## **3.5 Absaroka Beartooth Mountains Geographic Area**

3.5.1 General Overview p. 155

**Comment:** The Gallatin River does not flow through the Absaroka Beartooth Mountains Geographic Area and should be removed from the list of waters that do.

3.5.2 Ecological Characteristics p.156

**Comment:** Our earlier concerns with the brevity and lack of detail for this section were unaddressed. The Absaroka-Beartooth Mountains contain an exceptionally diverse assemblage of wildlife species and that is not reflected in this section.

**Comment:** The ecological characteristics section is not consistent between geographic areas—there is no mention of important wildlife species for many of these areas (e.g. Bridger, Bangtails, Crazy Mountains).



### 3.5.7 Plan Components–Stillwater Complex (SWC) p.163

**Comment:** We recommend adding the following language to the introduction: “The Stillwater Complex supports significant winter range for a native bighorn sheep population, a migratory mule deer population, and year-round range for a large elk herd. Additionally, the area supports critical grizzly bear habitat.”

#### Desired Conditions (AB-DC-SWC)

**Comment:** We recommend adding a Desired Condition 03: “Healthy rangeland supports healthy populations of bighorn sheep, mule deer, elk, and grizzly bears.”

#### Goals

**Comment:** We recommend adding the following goal: The Forest Service will continue to maintain or enhance wildlife habitat and population numbers.”

#### Guidelines:

**Comment:** We recommend adding the following guideline: “To avoid stressing wildlife during critical periods (e.g. calving, fawning, hyperphagia, use of winter/spring range), exploration activities should be scheduled and located so as to minimize disturbances.”

## 3.7 Madison, Henrys Lake, and Gallatin Mountains Geographic Area

### 3.7.2 Ecological Characteristics p.172

**Comment:** Our earlier concerns with the brevity and lack of detail for this section were unaddressed.

**Comment:** The Plan states that “all of the native animals still roam free....” This statement is incorrect as the area is not entirely a bison tolerance zone.

### 3.7.8 Plan Components–Cabin Creek Recreation and Wildlife Area (CCRW)

#### Introduction p.178

**Comment:** Emphasize the high wildlife value of this area. Wolverine are found here as well. Snowmobiling in this area could conflict with the guideline from page 70.

**Comment:** Add trapping to the list of popular activities.

#### Guidelines: (FW-GDL-WLWV) 01

**Comment:** Management actions in maternal habitat for wolverines should avoid disturbance during the wolverine reproductive denning season (mid-February through mid-May).

### 3.7.14 Plan Components–Hebgen Lakeshore REA (HLREA) p.185

**Comment:** FWP has provided comments here and under Airfields (page 92) previously regarding sightseeing tours and wildlife disturbance and they have not been addressed in this plan.

#### **CHAPTER 4. MONITORING PLAN**

**Comment:** Continue to include FWP in collaborative monitoring activities, surveying and inventorying aquatic species and habitats, as well as working on restoration projects. We look forward to continuing that relationship as outlined in the Monitoring Table.

#### **Definitions to add to Glossary:**

**Elk Analysis Unit:** the portion of an Elk Herd Unit that is on NFS lands.

**Elk Herd Unit:** *[use FS 2013 analysis guidance (Canfield et al., 2013)]*

#### **Appendix A. Management Approaches**

**Comment:** The Plan suggests beaver reintroductions with the support of partners (p.6). Partners need to be identified and must include state wildlife management agencies.

#### **Comment: Insert into p. 33**

"The amount and distribution of big game (elk, deer, and moose) security can be a primary factor determining whether big game will use or remain on NFS lands during the big game archery and rifle hunting seasons. Security areas are large blocks of big game habitat that are some distance from wheeled motorized routes open to the public during the big game archery and rifle hunting seasons. The appropriate scale at which to analyze the need for and to manage big game security areas is the Elk Analysis Unit (EAU) (Montana Fish, 2013). Specific characteristics of security areas, including size, distance from wheeled motorized routes open to the public, and the proportion of an EAU that is recommended to be in a secure condition will all vary by EAU depending on the combination of topography, vegetative cover, number and location of motorized routes, and other factors."

Proposed management approaches and possible actions p.39

**Comment:** Where there is potential for domestic and bighorn sheep to be on the same landscape, separation should be considered the goal. In this context, habitat features, herders, dogs, confinement, and other actions are not mitigation ends but only means to the goal of separation. As such, any mitigation strategy should assess how effectively or even if various habitat features or actions would accomplish separation and not simply if those means exist or could be applied. The Western Association of Fish and Wildlife Agencies

(WAFWA) *Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat 2012* should be consulted and followed.

Table C-6 p.66 in Appendixes

**Comment:** 6<sup>th</sup> level watersheds rated in each condition class....Bridger, Bangtail, and Crazy Mountain classifications of 24+ 11 don't total 25.

### **Priority Watershed Network Appendix C**

**Comment:** Add the following watersheds to the Priority Watershed Network: Dry Head in the Pryor Mountain GA; Soda Butte, Upper Boulder, Buffalo Fork of Slough Creek, and Upper Mill Creek in the Absaroka Beartooth Mountains GA. Consider adding Slough Creek, Bad Canyon, Woodbine Creek, Picket Pin Creek, Iron Creek, and Upper Deer Creek in the Absaroka Beartooth Mountains GA for conservation watershed networks.

**Comment:** Convene a discussion between FWP and USFS fisheries staff to review the proposed inclusions to determine the appropriate class for each stream.

### **APPENDIX F. VEGETATION CLASSIFICATIONS**

A. Natural Range of Variation:

**Comment:** It is unclear how the NRV model works in relation to scale on the landscape. There is reference to broad vegetation type grouping at the beginning of Appendix F, but it is not clear in the discussion of the NRV model what special scales are used in the model, or if multiple models are used, or one model for the entire forest.

### **LITERATURE CITED**

Canfield, J., Pengeroth, D., Tomasik, E., Dibenedetto, J., Northern Region Geospatial Group, Taylor, S., . . . Conway, L. (2013). *Custer, Gallatin, Helena, and Lewis and Clark National Forests. Framework for project-level effects analysis on elk.*

Lyon, L. J. 1983. Road Density Models Describing Habitat for Elk. *Journal of Forestry* 81:592–596.

Montana Fish, Wildlife & Parks. (2013). *U.S. Forest service and Montana department of fish wildlife and parks collaborative overview and recommendations for elk habitat management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests.*

Montana Fish, Wildlife & Parks. 2007. Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat and Yellowstone Cutthroat Trout in Montana. 37 pp. Available at <http://fwp.mt.gov/fishAndWildlife/management/westslopeCT/>.

Montana Fish, Wildlife & Parks. 2010. Montana Bighorn Sheep Conservation Strategy. Montana Fish, Wildlife & Parks, Helena, Montana. 313 pp.

Montana Fish, Wildlife & Parks. 2018. Montana's Statewide Comprehensive Outdoor Recreation Plan (SCORP). Available at: <http://stateparks.mt.gov/about-us/scorp.html>

Montana Fish, Wildlife & Parks. 2013. Montana Statewide Fisheries Management Plan, 2013-2018. Montana Fish, Wildlife & Parks, Helena, Montana. 478 pp.

Montana Fish, Wildlife and Parks. 2015. Montana's State Wildlife Action Plan. Helena, Montana. 441 pp.

Montana Fish, Wildlife & Parks and USDA Forest Service. 2013. U.S. Forest Service and Montana Department of Fish Wildlife and Parks Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests. Unpublished paper on file at: U.S. Department of Agriculture, Forest Service, Gallatin National Forest Supervisor's Office, Bozeman, MT. 36 pp.

Ranglack, D., B. Garrott, J. Rotella, K. Proffitt, J. Gude, and J. Canfield. 2016a. Security areas for maintaining elk on publicly accessible lands during archery and rifle hunting seasons in southwestern Montana. 38 pp.  
<http://fwp.mt.gov/fishAndWildlife/diseasesAndResearch/research/elk/default.html>

Ranglack, D., B. Garrott, J. Rotella, K. Proffitt, J. Gude, and J. Canfield. 2016b. Evaluating elk summer resource selection and applications to summer range habitat management. 36 pp.  
<http://fwp.mt.gov/fishAndWildlife/diseasesAndResearch/research/elk/default.html>

Spoon, R. and J. Canfield. 1999. Elkhorn Mountains Westslope Cutthroat Trout Restoration Program – Mountain Range Programmatic Environmental Assessment. April 28, 1999. 34 pp.