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Comments:

Comment draft plan - CGNF

Jun 5, 2019

Forest Plan Revision Team

PO Box 130

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Dear Revision Team,

Forest Managers:

Founded in 1983, Bear Creek Council is a local, all-volunteer, grassroots organization working to conserve and protect the integrity of our environment and community at the north entrance to Yellowstone National Park.

We currently represent over 50 members who live in the communities of Gardiner, Jardine, and the Paradise Valley, among other places, and our members continue to have a strong investment in forest management issues in our area. We value the forest resources in our area because they are linked inextricably to our lifestyles, and to our prosperity as a tourism economy.

Thank you for the opportunity to comment on The Custer Gallatin National Forest's Draft Management Plan. We like Alternative D for its wilderness emphasis, but prefer Alternative C, overall, for its emphasis on inclusion of all forest users/values.

We would like to make further suggestions. We are commenting on the Absaroka Beartooth and Madison, Henrys Lake, and Gallatin geographic areas. These areas, close to home, provide valuable wildlife habitat, headwater streams, and diverse recreational opportunities within the Greater Yellowstone Ecosystem.

We endorse the full incorporation of the Gallatin Forest Partnership (GFP) Agreement into the plan for the Gallatin and Madison ranges. While alternative C incorporates parts of that agreement, it does not accurately reflect the GFP's recommendations for wildlife protections or recreation monitoring. Looking outside the GFP agreement, it is also critical that we protect and enhance other areas, including wildlife linkage areas and existing wilderness, and include enforceable climate

change components. Specifically, we would like to see wildlife connectivity in portions of the Madison, Henrys Lake, and Gallatin Geographic Area that aren't otherwise protected by the grizzly bear recovery zone. The Madison range is critical for wildlife movement to areas beyond the National Forest.

Habitat protections for grizzly bears must extend wherever bears occupy the forest, and those should extend into areas important for connectivity. Grizzlies must also be designated as a Species of Conservation Concern. Their future is uncertain in the era of climate change and their conservation must receive the highest priority in forest planning.

Plan components need to support a year-round self-sustaining bison population on National Forest System lands. Restoring connectivity for bison needs to be a priority for the new forest plan.

The USDA stated in 2006, "there are two primary requirements for habitat connectivity. The first is that suitable habitats are present for species of interest, and the second is that there are no barriers to movement." There is ample suitable habitat for bison available.

We need to remove barriers to connectivity for bison on the Custer Gallatin National Forest, including these segments of fencing (1) 695 feet of electrified fencing to "maintain a bison corridor fence" with the Royal Teton Ranch, (2) 900 feet of jackleg fencing along the Yellowstone River near Yankee Jim Canyon and cattle guards on HWY 89 to stop bison from migrating beyond Gardiner Basin, and (3) jackleg fencing and cattle guards on HWY 287 in Hebgen Basin to prevent bison from migrating further west, toward the Madison Valley.

Cattle allotments are a barrier to year-round access to habitat for bison, and managing for cattle also displaces bison on the National Forest and at the same time brings grizzly bears into conflict with cattle, which results in dead bears. Previous permitting decisions represent substantial barriers to restoring connectivity for these species.

In terms of other wildlife priorities, West Pine and Porcupine Buffalo Horn backcountry areas must mirror Cabin Creek Wildlife Management Area in wildlife protection and wild character plan components.

Recreational use must be monitored more extensively by area, and standards must ensure that increasing recreation is balanced with wildlife protection.

Manage existing wilderness areas in line with the 2020 Vision.

Given the uncertainties of climate change, monitoring questions for vegetation, invasive species, aquatic resources, fire, and more must explicitly assess the effects of climate change and guide adaptive management as required by the 2012 planning rule (219.12(a)(5)(vi)).

We strongly support the eligibility of the Yellowstone River from the park boundary at Gardiner through Yankee Jim Canyon. In addition to the 30 rivers recommended as eligible for Wild and Scenic designation, also include Taylor Creek, Hellroaring Creek, and the South Fork of the Madison due to their outstanding wild character.

Thank you for your work on this important issue.

Respectfully submitted,

Nathan Varley, PhD  
President, Bear Creek Council

Respectfully,

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