Montanans for Gallatin Wilderness

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Mary Erickson, Supervisor

Custer Gallatin National Forest

Dear Ms. Erickson,

 Please accept these comments on the Draft Assessment and Draft Need for Change for the Custer Gallatin Forest Plan Revision. I am submitting these comments on behalf of Montanans for Gallatin Wilderness, an informal group of citizens concerned with protection of the wild Gallatin Mountain Range as well as surrounding public lands. We have advocated for full Wilderness protection for the roadless portions of the Gallatin Range since 2007. We remain committed to a goal of a 546,000 acre Gallatin Range Wilderness in the Custer Gallatin National Forest and Yellowstone National Park.

With great uncertainty surrounding public lands under the Trump administration, it is time the Forest Service step up and strive for sustainable, ecological management of national forests. After all, Forest Service people may be out of a job if public lands (God forbid) get transferred to states. Forest Plan Revision is necessary but in the bigger picture will it do any good? How about standing up for these lands while we still have them? There is no time like the present to state that these lands MUST remain in public hands. Turning our public lands heritage over to the states is the first major step toward privatization and commercialization of these lands. One only need look at Big Sky and the Yellowstone Club to see what the results would be.

The Forest Service should anticipate substantial population growth in the Gallatin Valley and elsewhere around the Custer Gallatin, which will only increase the value of wild, primitive landscapes and the solace and renewal they can provide for beleaguered humans. Recreation pressure can only increase meaning all forms of recreation need to be managed wisely to reduce and minimize related impacts on the land, wildlife and waterways.

 In regard to what you folks call “timber” (trees and forests), I note that the original Custer NF Plan (1986) set a goal of 6.4MMBF long term sustained yield capacity (LTSYC), with an ASQ of 3 MMBF.

The Gallatin NF Plan (1987) Gallatin set a LTSYC of 27 MMBF, which was to be the eventual ASQ over time. The current Gallatin ASQ is 21 MMBF. The total timber sold from the combined forests has not exceeded 13 MMBF since 1993. Clearly those early timber targets were over-ambitious, and did not take into account the trend on national forests away from logging and toward recreation and resource protection. The LTSYC in the new Forest Plan should be adjusted downward to reflect the reality of timber sales and harvest and market conditions, and the way that national forests are now used.

Also, “regeneration harvest” (clearcutting) has not been used on the Custer Gallatin since 2009 which is a good trend. Clearcutting should be permanently phased out and no longer considered as an option for forest management in the new Forest Plan.

In regard to forest disturbance and natural ecological processes, I note that 809,759 acres has burned since 1985, most of it in the Custer. Mountain pine beetle has had the greatest impact on forests and affected approximately 1,103,428 acres, while spruce budworm had the second greatest impact and affected approximately 1,023,232 acres. The new Forest Plan should recognize that insect infestations are inevitable and natural, though they are probably being exacerbated by climate change.

The Forest Plan should also do a better job of incorporating the best available science on the ecological role of fire and recognize that logging (“fuels treatment”) is a poor and ineffective way to manage fire, especially given the increasing frequency and severity of forest fire.

In the Designated Areas report, the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area is incorrectly listed as 55,000 acres – it is actually (about) 155,000 acres!

Roadless Areas and Wilderness Study Areas should be Recommended Wilderness in the new Forest Plan and managed as Designated Wilderness, as is the case on the Beaverhead-Deerlodge National Forest. We request that the following areas receive Recommended Wilderness status: Beartooth , Black Butte, Burnt Mountain, Chico Peak, Dry Canyon, Fishtail Saddleback, Gallatin Fringe, Hyalite-Porcupine-Buffalo Horn Wilderness Study Area, Line Creek Plateau, Lionhead, Madison, North Absaroka, Red Lodge Creek Hellroaring, Reef, Republic Mountain, West of Woodbine, Bridger, Box Canyon, Crazy Mountain, Lost Water Canyon, Cook Mountain, King Mountain and Tongue River Breaks.

The 196-87 Custer-Gallatin Forest Plans recommended a paltry 35,780 acres for Wilderness, while around 679,000 acres were deemed suitable for timber production. This clearly shows the bias of the Custer Gallatin Forest toward resource extraction over stewardship. It’s time the Forest Service recommended some substantial Wilderness acreage, especially on the Custer, which is sorely underrepresented. One place to start would be Lost Water Canyon in the Pryors.

The Custer-Gallatin should re-launch their road reclamation project, which made substantial progress at closing and reclaiming logging roads in the Gallatin Range under hydrologist Mark Story. Since Mark’s retirement this highly effective program has languished. I spent 3 fall seasons monitoring camera traps (for a nonprofit that had a permit to do so) on reclaimed roads in Moose and Swan Creeks, and it was amazing to see the wildlife return as soon as the motor vheciles were excluded. I even caught a grizzly sow with 2 cubs on camera in Moose Creek.

Wildlife:

The spectacular array of wildlife still found on the Gallatin and Custer should never be taken for granted. Without wildlife it is just land. This is where some of our most important wildlife species have made a last stand and a comeback – elk, bighorn sheep, grizzly bears, bison…imagine the land without them. It almost happened, and could happen again if we are not vigilant.

In general, the new Forest Plan should implement and expand on the wildlife movement and connectivity program laid out in the Gallatin Travel Plan of 2006. Wildlife corridors such as the route north from the Gallatin Range into the Bridgers and Big Belts should be recognized, designated, and enhanced. The amazing migration of Mule Deer in Wyoming, from the Red Desert to Jackson Hole and back, shows that wildlife are resilient and determined, if given a chance. They know the land and how to use it.

Forest Plan direction must be consistent with long term conservation of grizzly bears, lynx, wolverines, wolves and other threatened, endangered and sensitive species. Wild areas such as the Gallatin Range must be recognized as essential refugia for these species in the face of climate change and exploding human population.

Grizzly Bears: The Forest Plan must recognize and designate wildlife travel corridors not only to the Northern Continental Divide Ecosystem but also the Greater Salmon Selway. The Forest Service should work with USDOT and state Highway departments to create safe passages for wildlife crossing busy roads such as I-90 and Highway 191. The expert report on grizzlies claims that “secure habitat for grizzlies has increased over time” (page 44 of the Wildlife report). How can this be true? With more and more humans on the landscape secure habitat is going to decrease. Granted, the closure of some roads and trails to motorized use has helped.

Bison: Given that “there is forage for 1,177 bison year round or 2,354 bison for 6 months in the Madison, Gallatin and Absaroka Mountain Ranges” (Wildlife report) 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 closely examine how to restore bison to the Taylor Fork, upper Gallatin, and possibly even upper Slough Creek/Pebble Creek areas. Montanans for Gallatin Wilderness members and supporters greatly value the presence of wild bison on the landscape and where better than the iconic landscapes of the Custer Gallatin?

Lynx: Even though no lynx have been detected on the Custer-Gallatin since 2009, it is imperative that critical habitat be preserved and lynx given a chance to survive and return. Lynx are in the Wyoming Range and areas in Northern Montana and could certainly repopulate the Custer Gallatin. Trapping should be eliminated in critical habitat to avoid any “incidental” take of lynx.

Bighorn Sheep: Bighorns are under so much pressure on so many fronts and are ultimately rather fragile. Two key populations – the Hellroaring and Monument Peak herds – are listed in the Wildlife report as under threat from snowmobile incursion into Wilderness. Now this is one threat that could be managed and eliminated if the Forest Service took Wilderness patrols seriously. Threatening the survival of native wildlife for the sake of ephemeral motorized thrills is inexcusable behavior, and motorized trespassers in Wilderness should be prosecuted.

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

For Gallatin Wilderness

Phil Knight