

January 6, 2017

Attn: Forest Plan Revision,
Custer Gallatin National Forest,
10 E Babcock, P.O. Box 130,
Bozeman, MT 59771

Dear Forest Plan Revision Team;

Please accept these comments from me on the Draft Assessment of Existing Conditions and Draft Preliminary Need to Change document on behalf of the Alliance for the Wild Rockies and Native Ecosystems Council.

The 1998 Interagency Grizzly Bear Taskforce report requires the development of motorized access management standards for grizzly bears for each and every individual grizzly bear recovery zone. More specifically, the 1998 Interagency Grizzly Bear Taskforce report and the best available science require quantitative standards that (1) conserve a percentage of habitat as "core" or roadless habitat, (2) place a limit on the percentage of an area with open motorized routes over 1.0 mile/square mile, and (3) place a limit on the percentage of an area with total motorized routes over 2.0 mile/square mile.

Forest Plan Amendment 19 and the biological opinion for Amendment 19 specifically acknowledge that the requirement applies to the Gallatin National Forest.

The agencies have developed forest plan motorized access management amendments for the two other occupied grizzly recovery zones in the country: the Northern Continental Divide Recovery Zone and the Cabinet- Yaak/Selkirk Recovery Zone.

The agencies have failed to complete these amendments for the Yellowstone Grizzly Bear Recovery Zone.

The agencies failure to complete and implement these standards violates the ESA, NFMA, NEPA and the APA. Without these standards included as a Forest Plan amendment, the agencies do not have in place a legally and scientifically adequate biological assessment, biological opinion, and incidental take statement for grizzly bears for the Forest Plan for the Custer Gallatin National Forest.

Thank you for your time.

Sincerely yours,

Michael Garrity
Executive Director
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P.O. Box 505
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and for

Sara Jane Johnson, PhD
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