

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.

Please follow the best available science on elk habitat, Christensen et al (1993), recommends elk habitat effectiveness of 70% in summer range and at least 50% in all other areas where elk are one of the primary resource considerations. According to Figure 1 in Christensen et al (1993), this equates to a maximum road density of approximately 0.7 mi/sq mi. in summer range and approximately 1.7 mi/sq mi. in all other areas.

Christensen et al (1993) state that if an area is not meeting the 50% effectiveness threshold of 1.7 mi/sq mi, the agency should admit that the area is not being managed for elk: "Areas where habitat effectiveness is retained at lower than 50 percent must be recognized as making only minor contributions to elk management goals. If habitat effectiveness is not important, don't fake it. Just admit up front that elk are not a consideration."

Christensen (1993) also recommends landscape level analyses cover areas that range from 30,000 to 150,000.

Christensen et al (1993) states: "management of winter range to improve thermal cover and prevent harassment may be as important as anything done to change forage quality or quantity."

Christensen et al (1993) recommends closing roads and avoiding disturbance on elk winter range: "Road and Other Disturbances. Disturbance and harassment result in tremendous energy costs to wintering animals. Selective road closures and restrictions on recreational use have proved effective in reducing these costs."

SNAGS

Please have Revised Forest Plan snag standards that ensure the viability of species dependent on snags and are follow NFMA, NEPA, and the APA. Please demonstrate that the revised Forest Plan will ensure that there enough snags across the landscape to ensure the viability of wildlife species dependent on snags.

Please have revised Forest Plan standards to ensure the viability of native fish and follow state and federal water quality laws and regulations. Please require that TMDLs for streams are standards instead of guide-lines.

Please consider managing all inventoried roadless areas administratively as wilderness.

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

Director, Native Ecosystems Council
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Willow Creek, MT 59760