



Sent via Email to: cgplanrevision@fs.fed.us

January 6, 2017

Custer-Gallatin Forest Plan Revision Team
P.O. Box 130
10 E. Babcock
Bozeman, MT 59771

Re: Custer Gallatin Forest Plan Revision: Draft Assessment of Existing Conditions and Draft Preliminary Need to Change

Dear Forest Plan Revision Team,

Thank you for the opportunity to comment on the *Draft Assessment of Existing Conditions (Assessment)* and *Draft Preliminary Need to Change (Need to Change)* documents associated with the Custer Gallatin Forest Plan Revision.

We submit these comments on behalf of more than 2,000 Sierra Club members in Montana and 2.4 million members and supporters nationwide. Our members spend significant time on the Custer Gallatin National Forest (CGNF) in a variety of pursuits and are deeply interested in its management. Sierra Club plans to fully engage in all phases of the revision of the Custer Gallatin Forest Plan.

As noted in the Assessment, the CGNF plays a significant role in the entire National Forest System, in particular to its outstanding cultural resources, large swaths of remaining intact wildlands, iconic native wildlife, and its contributing role in the overall health of the Greater Yellowstone Ecosystem, the most intact temperate ecosystem in the northern hemisphere. We appreciate the CGNF's acknowledgement of these special qualities and the critical need to protect them for the wild species that depend on these intact wildlands as well as for future generations of people.

Overall, we believe that CGNF has done a good job of identifying why the Forest Plan needs to be updated, namely to incorporate new science particularly in regard to climate change, as well as to comply with regulations and policies enacted since the last Forest Plans were implemented, and to ensure consistent management approaches across what were two separate forests. We trust that there will be additional opportunities to address issues throughout the plan revision process; as noted in the Need to Change, the document is preliminary and therefore may be further revised as additional issues are brought forward in the planning process.

We further understand and appreciate the need to update existing planning documents to reflect current forest planning standards as well as the recent administrative consolidation

of the former separate Custer and Gallatin National Forests. As noted in the review documents, this consolidation has created an administrative unit of substantial size and great ecological diversity, impacted by very divergent environmental, political, and public use pressures. We appreciate and support the need for administrative consistency in the management of CGNF lands; at the same time, however, we trust that the remaining steps in the planning process will recognize the combined forest's diversity, and offer nuanced planning and administrative solutions for different forest regions, reflective of specific ecosystems and the specific pressures they face.

We recognize the apparent efforts by the CGNF to make the Assessment summary accessible to the general public in its presentation. In the short time allowed since release of the Assessment/Need to Change, we were not able to review all of the associated specialist reports, which reflect, in part, the CGNF's exceptional geographic and resource diversity. We note that the level of detail varies greatly among these reports, and while we appreciate the professional efforts that have gone into the creation of this work over the years, we believe that in at least some instances, the level of information gathered to date may potentially be insufficient to render fully-justified analyses of all topics that future planning documents will need to address. The Draft Recreation Settings, Opportunities, and Access Report, for example, does not appear to contain the level of location-specific detail needed to adequately address current visitor use impacts, or to assess how those impacts are likely to escalate in the future. Similarly, information about the current and expected future impacts of climate change is scattered among multiple documents and may lack the detail needed to consider management changes to respond appropriately. Again, we trust that the continued planning process will recognize this, and call for the completion of additional scientific study as needed, to ensure that future planning decisions have a strong scientific basis. We recommend that future draft documents be prefaced with a stronger identification of the data gaps that may underlie the analyses, and propose methods for accumulating and documenting the necessary information.

As noted throughout the planning documents, portions of the CGNF are focal points of increasing human activity – changes that are likely to greatly impact areas of the Forest throughout the lifespan of the final planning documents. These changes include rapidly increasing population density and growing visitor use in much of the former Gallatin National Forest, and non-renewable resource development pressures in portions of the former Custer National Forest. Based on our partial review, it appears that there may be insufficient baseline data in the specialist reports to adequately address the likely future impact of some of these conditions, reducing the efficacy of the final planning documents and potentially placing significant forest-managed resources at risk during the Forest Plan's lifespan. We recommend that the Forest consider the development of additional baseline data to more strongly address this.

Finally, the Need to Change document (p. 3) notes the acquisition of some 73,000 acres of federal land in the CGNF. We are concerned that some or all of this additional land may have been in private ownership during preparation of the Forest's baseline data, and thus not adequately evaluated or reviewed. The total acreage involved is substantial

enough that this deficiency may have the potential to materially impact analyses of roadless areas, wildlife habitats, or other qualities. If this is a deficiency, it should be addressed.

Comments on specific topics follow.

I. Visitor Use & Recreation

We appreciate the information provided in the Assessment in regard to visitor use, which for the CGNF, rivals that of Yellowstone and Grand Teton National Parks (Assessment p. 109). As noted, “...*national forest use is rising faster than expected and recreational demands are becoming more varied and intense due to population growth and social changes*” but “*Management is also challenged as communities expand closer to the national forest....funding has fallen, reducing the ability to properly manage recreational resources as they currently exist, let alone if they change or if new recreational demands arise.*” (Assessment p. 113).

The CGNF cannot be all things to all people. As the Assessment notes, “recreational demands must be balanced with other resource obligations, such as fish, water and wildlife.” (Assessment p. 113) Sierra Club appreciates the CGNF’s recognition that “*The resource that draws people to the Custer Gallatin is not infinite. As visitors’ expectations, needs and perceptions change, desires must be balanced with resource capabilities. Not all desired uses or future recreation trends may be accommodated or appropriate on the Custer Gallatin National Forest.*” (Draft Recreation Settings, Opportunities and Access Report p. 38) We urge the CGNF to ensure that the integrity of the CGNF’s irreplaceable remaining wildlands and rivers remain intact and are given the highest protection possible, and that restoration of adversely impacted areas is a high priority. We agree that “*There is a need for plan direction to guide the management of new and emerging technologies that may affect recreation opportunities*” but are concerned about ambiguous language regarding the CGNF’s desire to “*build in enough flexibility in the Forest Plan that new technologies can be addressed.*” (Need to Change p. 5)

As noted above, greatly increased visitor use is evident in much of the CGNF, particularly in those portions of the forest within the Greater Yellowstone Ecosystem. We are concerned that the level of baseline data may not be sufficient to allow for a full analysis of this growth, and its likely future impacts on the ecosystem, which is already under considerable pressure from visitor use. We feel that it is crucial for the planning process to be based on a full understanding of these visitor use pressures, so that resultant planning decisions will properly protect the region’s outstanding natural qualities.

We are also concerned that the review documents and accompanying baseline material may not adequately address the need to address and respect traditional Native American use patterns in portions of the forest, particularly the Pryor Mountains area and the Ashland Ranger District. It is crucial that the planning process include both collaboration with the region’s Native American groups, and a baseline outreach to them for additional information that may be relevant to the planning process.

II. Designated Areas

A key area of interest for the Sierra Club is recommendation of additional wilderness on the CGNF. We realize that this step comes later in the process through the wilderness evaluation inventory and subsequent steps. As the Designated Areas Report notes, “...*the development of the need for change in the context of the existing and desired future condition will also play a very informative role in understanding the potential need or opportunities for additional designations.*” (Draft Existing Designated Areas Report, p.4)

As part of the Assessment, we recommend that the CGNF consider relaunching the Forest’s road reclamation project, which made substantial progress on closing and reclaiming logging roads in the Gallatin Range under hydrologist Mark Story, and has languished since his retirement.

We note an error in the acreage of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area in the Assessment on page 8 – the correct acreage is 155,000 acres.

III. Wildlife

Grizzly Bears

Connectivity between the Greater Yellowstone and Northern Continental Divide Ecosystems is critical for true recovery of grizzly bears in the lower 48 states. Some information is presented on this topic in the Assessment and associated Draft Terrestrial Wildlife Report (Wildlife Report), but more detail and data is needed. The Wildlife Report cites research that identified the Bridger and Big Belt Mountain Ranges as the most important corridor for connectivity. In regard to the Bridger Range, which as noted is in the plan area, “*Grizzly bears would have to cross Interstate 90, a frontage road, and railroad tracks, plus intermingled private development to get from currently occupied habitat in the plan area to the Bridger Range and vice versa.*” The Wildlife Report should include a much more detailed analysis of existing conditions on the ground that hinder, help, or could be improved in order to facilitate connectivity.

Regarding the existing status of the grizzly population in Greater Yellowstone, the analysis virtually ignores information from independent scientists that challenge certain research findings and conclusions of the Interagency Grizzly Bear Study Team (IGBST). The Wildlife Report bases its complete reliance on IGBST conclusions on the reasoning that they are based on “methods that are critically reviewed and evaluated.” (Wildlife Report p. 39) and dismisses research of Doak and Cutler, as one example. However, Doak and Cutler’s research was also peer-reviewed and also represents best available science, and the Assessment should therefore not summarily dismiss it as was done in the Wildlife Report.

We note that the population estimate quoted for 2015 is in error; the grizzly bear population estimate for 2015 was 717; the 2014 population was estimated to be 757. The Assessment should note this decline.

Canada Lynx

We support the Wildlife Report's conclusions that much more study of Canada lynx, lynx prey, and habitat conditions are needed in the plan area and, more broadly, the Greater Yellowstone Area. As noted, *"Within the plan area, secondary lynx habitat is found in the Gallatin, Madison, Henrys, Bridger, Bangtail and Crazy Mountain Ranges. Of these, all but the Madison and Henrys Mountains have had recent surveys, with no detections of lynx. Additional survey efforts in the Madison and Henrys Ranges could provide information on availability of snowshoe hare habitat, hare presence and/or abundance, and potentially, presence of lynx. Such information would inform an assessment of the contribution of these ranges to lynx habitat conservation. Finally, as per the Northern Rockies Lynx Management Direction, continued monitoring may be needed in the Bridger/Bangtail/Crazy Mountain landscape, which is currently identified as "secondary, unoccupied" lynx habitat, to determine whether any of these areas becomes occupied by lynx in the future. At the very least, these areas should be monitored for suitability and hare production, in order to serve as possible connective habitat for lynx."* (Draft Terrestrial Wildlife Report pp. 54-55). Thirty-eight percent of the plan area provides boreal forest conditions preferred by lynx and snowshoe hares; it is critical that this habitat be preserved in order to give this threatened species a chance to return and repopulate the CGNF.

Bison

As noted in the Draft Terrestrial Wildlife Report, in 2015 Governor Bullock made a historic decision to allow bison access to year-round habitat in Montana outside of Yellowstone National Park. A large portion of the new habitat on the west side of the Park is located in the Upper Gallatin/Taylor Fork drainage. We appreciate that the CGNF has undertaken a habitat baseline study in the Gardiner Basin in 2015 and has plans to do a similar analysis on Horse Butte in 2017-18, and we urge the CGNF to also undertake an analysis of the Taylor Fork area, which we recognize will require additional resources.

Wolverine

Sierra Club is concerned about the following statement in the Wildlife Report: *"Wolverines are considered a furbearer in Montana, and although the trapping season is currently effectively closed, it could be re-opened under the right circumstances.* (Draft Terrestrial Wildlife Report p. 71) We seriously question the meaning of this statement, and its appropriateness in the Assessment. The Wildlife Report itself notes that *"There is no doubt that wolverine populations can be affected by human persecution through trapping and predator control, and it appears that no other human activity has the same potential to limit wolverine populations (Ruggiero et al. 2007; Copeland et al. 2010)"*

(Draft Terrestrial Wildlife Report p.71) Though regulated trapping was highly limited in the past, Sierra Club believes that any regulated or incidental trapping is detrimental to the extremely small and vulnerable wolverine population in the lower 48.

IV. Timber

As noted in the Draft Timber Report on page 19, “*Current forest plan direction addressed forest health objectives but the assessment indicates that forest resiliency to disturbance agents such as wildfire, insects, and disease has decreased and therefore the forest health objectives have not been effective.*” The Assessment/Timber Report should provide more detailed analyses and information regarding the ineffectiveness of existing measures in meeting the forest health objectives.

The Draft Timber Report also states that “*There is a need to reanalyze the lands designated as tentatively suitable for timber production. Suitability analysis was not completely mapped across both the Custer and Gallatin National Forests during the 1987 forest plans. Further, the Gallatin National Forest acquired approximately 72,721 acres during the 1990s that were not included in the suitability analysis.*” (Draft Timber Report p. 19) We agree with the need for a new analysis, and assume by the Report’s statement that timber suitability will be addressed in this Forest Plan Revision but it was unclear from our reading of the documentation whether this will in fact occur.

In conclusion, we appreciate the public engagement opportunities thus far in the Buster Gallatin plan revision process. We ask that the concerns and information/analysis gaps which we have outlined above be addressed, and look forward to continuing to engage with the Forest Service and other stakeholders throughout the process to protect this unique and spectacular landscape.

Sincerely,

Bonnie Rice, Senior Representative
Greater Yellowstone-Northern Rockies Campaign

Mark Hufstetler
Greater Yellowstone-Northern Rockies Campaign Volunteer Co-Lead

Phil Knight
Greater Yellowstone-Northern Rockies Campaign Leadership Team Member
MT Chapter Sierra Club Conservation Committee Member