CGNF Forest Plan Proposal – Comments

Don Bachman

3910 Sourdough Rd.

Bozeman, MT 59715

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Forest Plan Revision Team

Custer Gallatin National Forest

10E. Babcock, P.O. Box 130

Bozeman, Montana 59771

Forest Plan Revision Team:

The following comments are in response to the CGNF Proposed Action – Revised Forest Plan – January 3, 2018. Please incorporate into the Proposed Action comments my earlier comments on the Plan elements, as submitted on December 8, 2016 and September 14, 2017. I am pleased to participate in this process and look forward to the continued revision work that you will engage in, leading to a Forest Plan which will guide the administration of this very special place in the Nation’s public land inventory.

Under Plan Content – Distinctive Roles and Contributions within the Broader Landscape, this informative section should include the presence and role of the CGNF in the public land management of the Greater Yellowstone Ecosystem (GYE) as defined by The USGS Rocky Mountain Mapping Center and/or the Yellowstone Resources and Issues Handbook – 2017 pg. 53. There are occasional references to the GYE in this document, but no definition. This is especially important for mention in the Forest Plan, because the CGNF hosts the Greater Yellowstone Coordinating Committee which is devoted to the interagency administrative role within this unique geographic region.

Under Suitability of Lands, pg. 10, I’d refer you to my comments of September 14, 2017 – paragraph 2.

I recognize that the Hyalite timber stand may be suitable for the local stud mill, but I am concerned that disturbance associated with its utilization will conflict with the sustainability of scenic integrity objectives and wildlife habitat and connectivity.

I believe that the absence of bison, as a Species of Conservation Concern (SCC) by designation, is a serious omission in the development of the Wildlife Goals (FW-GO-WLSAR) on pg. 46. Efforts to expand bison range on to suitable habitat beyond Yellowstone National Park are ongoing. The CGNF provides suitable habitat for the movement and by doing so, contributes to the integrity of the GYE. The Forest’s role in the Interagency Bison Planning Plan (IBMP) highlights this responsibility. While Designation of a SCC rests with the Regional Forester, she acts upon input provided by the Forest in it’s assessment document of February, 2016. That input should have confirmed SCC eligibility. Because of management policy imposed by the State of Montana, bison have been constrained from utilizing CGNF habitat. There appears to be suitable habitat on much of the National Forest contiguous with YNP. Aa the state-imposed tolerance zone is potentially expanded in and beyond the Year Around Bison Tolerance Area and recognizing the presence of bison already in the Gardiner (Northern Bison Tolerance Area) and Cooke City area, designation as an SCC is appropriate. This designation implies a cooperative role that the CGNF is responsible for establishing, especially given the long-term mandate of the plan.

This recognition of habitat suitability and bison species scarcity is also acknowledged the Scientific Report: Wilderness, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area by the Craighead Institute; Lance Craighead, PhD – November 2015 – pg. 118.

The relationship between management priorities and Grazing Allotment Status illustrates the conflicts that can arise. As allotments are vacated, they should be closed or modified. The Lion Creek allotment used to be grazed by steers-only as the permittee, Hank Rate understood the potential for disease transmission even though it was a remote consequence. He has since relinquished his permit, and this allotment should be withdrawn. On-dates of active allotments should be changed to July 15 in recognition of disease transmission as a seasonal manifestation. The probability of transmission from elk is very likely to increase over the years and unless a more effective cattle vaccine is developed, the possibility of all public land grazing being terminated is very real and should be mentioned in the Plan Revision.

Under Scenery, on pg. 85, the following statement is made: “The Forest’s scenery provides for public enjoyment of the landscape’s varied ecological regions, in relation to viewing contexts and expectations for highly valued viewsheds, across its broad geographic expanse from the mountains and valleys in the Greater Yellowstone Area to the eastern pine savanna raised uplands, rolling hills and grasslands”. This acknowledgement of the CGNF position in the GWA should also be stated under General Wildlife (WLGEN) in the context of the role federal lands play in connectivity, between habitats through migratory and geographic range-expansion instinct.

The section on recommended wilderness areas is best considered with reference to Appendix D of the proposed action – Polygon Number: Gallatins\_28. The most questionable portion of the Summary is the statement: “Management for wilderness character would be difficult where there are 19,435 acres of ‘outstanding subsurface mineral rights’. Impacts resulting from mineral actions outside the purview of the Forest could take place in these split estate situations, thereby detracting from existing wilderness characteristics”. The only further reference to mineral activities is in Table 56 where the information is stated as: “10 recorded abandoned mine lands”. It is also unclear where and what are the “2 mineral reservations covering 17,447 acres”. Please clarify these statements and indicate where the nearly 37,000 thousand acres of potential contention is located. The research I’ve done on this issue indicated there are no outstanding subsurface mineral rights as referenced by the following website: <http://www.mylandmatters.org/Maps/ClaimsMt/GetMap>. Further in the “USGS Mineral Reserve Study for the Gallatin National Forest” Professional Paper #1654: <https://pubs.usgs.gov/pp/2005/1654/pdf/P1654.pdf> there is no indication that any locatable minerals are of interest in the Gallatin Range. Thus, the objection for wilderness management on the 37,000 acres of outstanding mineral rights appears to not be an issue. I do agree with the constraint of the Big Sky Snowmobile trail and would endorse a modification of the WSA boundary to bring the boundary of the recommended wilderness area to the east a suitable distance to maintain scenic and audible noise values. However, the remaining management constraints are mostly self-inflicted though preveous travel management plan decisions, which can be rescinded by a different process, after the Record of Decision has been made. I believe that the significance of the HPBH WSA is confirmed by the Craighead Report, citied above when it concludes on pg. 133 that “By all these criteria (*referencing the study)* that the HPBH WSA certainly qualifies for wilderness designation.” Please include this recommendation as a preferred alternative in the upcoming revision process.

I look forward to the development of the full range of Forest Plan Revision Alternatives that are required under the National Environment Planning Act (NEPA). While this formal Proposal by the Forest Plan revision team reflects in the most part the need for change and purpose of this Land Management Plan under the 2012 Planning Regulations, it does fall short as indicated, in some key areas of consideration: wildlife, suitability, large landscape (GYE) position and Wilderness designation. I look forward to receiving and reviewing the NEPA scoping documents leading to a DEIS and the opportunity to review and comment on the full range of revision alternatives.

Sincerely,

Don Bachman