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I am writing to submit comment on the revision of the Forest Management Plan for the Custer Gallatin National Forest.

1. Forest Management Area G needs to be reevaluated.

-The goals of Management Area G have largely been met by past forest management and forest sections under this designation, specifically the Burnt Mount/Red Lodge creek drainage, are exhibiting healthy diversity, old growth characteristics, pathogen resistance, watershed protection, and critical wildlife habitat.

-The National Forest system should not be managed for commercial wood product mills as their motivations are in direct conflict with the stewardship goals of the Forest Service. Local economies are better served by management aimed at providing firewood gathering, Christmas tree harvesting, post/pole permits, teepee pole harvest, grazing, and small scale non-commercial harvests.

-The Burnt Mountain/Red Lodge creek drainage is directly affected by the recent MT state land timber harvest and classifications for this area should take into account the landscape changes associated with this harvest. Viewshed, watershed protection, wildlife habitat, recreation, forest diversity, etc… are all impacted by this management and therefore the designation should be changed to reflect this.

-The Burnt Mountain/Red Lodge creek drainage’s proximity to Management Area’s H & I should preclude commercial activity that will compromise the integrity and buffer this area currently provides.

-The recent judicial decision to require a more thorough evaluation of lynx habitat affecting the Greater Red Lodge Area Vegetation Management Project indicates that this type of commercial management is no longer appropriate, in line with stewardship guidelines, or legal.

-Management Area G needs to be revised to reflect the Forest Service’s own requirements under the “Need for Change”:

“New information and science has been developed in the 30 years since the current plans were adopted. Examples of new information and science needs to guide the revised plan include: • There is a need to be consistent with the best available science and the most current understanding of ecosystem process and function. • There is a need to address impacts reasonably expected to occur as a result of new information regarding climate change. • There is a need to update the soils guidance in the revised Forest Plan. The current plans provide limited direction that does not reflect current science. • There is a need to incorporate best available ecological and restoration concepts, such as metapopulation dynamics; headwater and prairie stream, riparian, and groundwater ecology; and invasive species. • There is a need to provide updated management direction for the protection, maintenance, and restoration of riparian and wetland vegetation and channel morphology reflecting current science. • There is a need to provide direction on the sustainable management of groundwater, springs, wetlands, riparian areas, and intermittent and perennial waters and their interconnections, reflecting current science. • There is a need to incorporate multi-species and/or habitat-based plan components that are consistent with current science; for example, hiding cover and habitat security.”

Thank you for your consideration.

Henry Dykema