

Custer Gallatin National Forest
cgplanrevision@fs.fed.us

To The Forest Plan Revision Team

I respectfully submit these comments to the Forest Plan Revision Team at the Custer Gallatin National Forest (CGNF) concerning their Proposed Custer Gallatin Forest Plan. Please include me (telechele@hotmail.com) on the mailing list for the duration of this forest plan process.

I have lived in Western Montana for 33 years. 10 of those years were spent in the Gallatin Canyon and Bozeman areas. I have fantastic memories of time spent in the Custer Gallatin National Forest enjoying the peace and solace that only untouched, wild nature can provide. I consider the area an invaluable treasure because of its wide array of contiguous roadless areas that have remained wild and are home to grizzly bears, lynx, wolves, elk, moose, mountain goat, probably wolverine and genetically pure Yellowstone and West Slope cutthroat not to mention pika and countless other creatures.

These unique, rarely travelled areas demonstrate the character of our rustic and untamed Montana. It is these wild areas that make Montana unique to the rest of the United States and the world. I still return to the Gallatin area to enjoy its unique wild lands. Countless others do the same supporting a multi-billion dollar tourist industry. Most don't travel into the wild lands, but the idea that they are there, untamed and filled with grizzlies and lynx, bring these tourists to Western Montana.

I understand that there is substantial political pressure to supersede science with measures that would increase recreation, logging, mining, grazing and drilling on our public lands. The forest service must be immune to political pressures. That was the intent of Teddy Roosevelt, when he created legislation and agencies to protect our wild and beautiful areas. The best available science should be used to manage the forest, not fear, not political pressure, not budgetary pressures, nor powerful lobbyists. The forest service is obligated to use the best available science to preserve the land and the wildlife that have no voice or political might.

Crafting this plan is crafting the future of the forest. The Custer Gallatin National Forest top priority should be to provide for high quality wild lands in perpetuity and thus protecting the forests, our clean water supply, and our ecosystem.

WILDERNESS

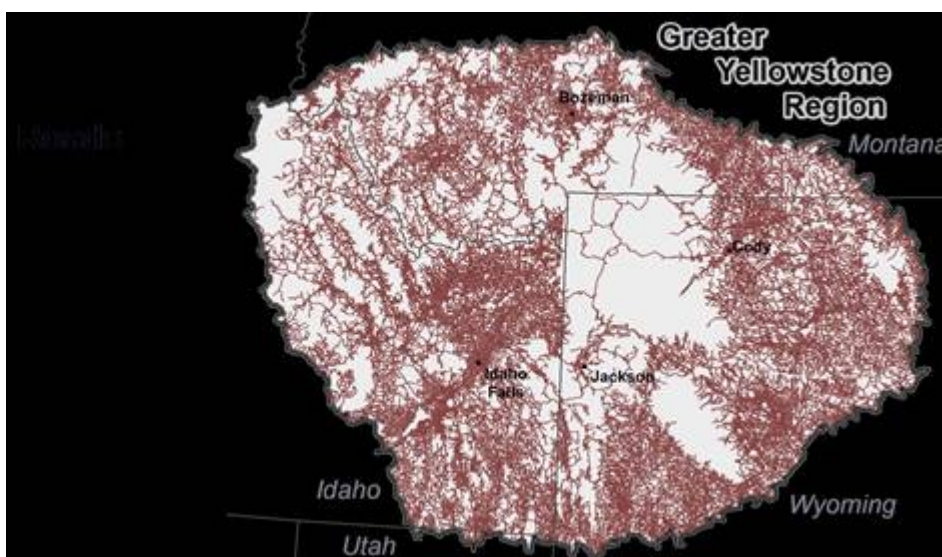
I will begin with wilderness designations. Wilderness is the best way to preserve the forest, allow wildlife to thrive, and protect our water supply. As the human population grows, so does its need for clean water. It also puts pressure on forest managers to increase recreation as we have seen in this forest planning process. Recreation should take second place to clean water and pristine rivers. The Forest Service budget is dwindling and will continue to diminish at least for the next three years, hopefully not seven. There is no money to increase trails and recreation and there is no money to maintain roads. Right now the Forest Service has a 5.2 billion dollar problem in deferred maintenance and repairs needed to bring roads to BMP's according to a forest service statistics brochure *see attached* FS-905. It cannot afford more recreational impact at this time or long into the future. Neither can wildlife.

Now is the time to set aside WSA's and other recommended wilderness areas as wilderness so they protect necessary wildlife corridors, our rivers and our clean water supply.

I commend you for setting aside a high elevation rock and ice corridor as wilderness, but it does not go far enough. Our rivers and our animals pass through lower elevation areas as well and those areas need to be set aside and protected. Few places have the undisturbed landscapes and wildlife found in the CGNF. With so little secure habitat left, it is the duty of this forest to preserve and maintain what they have.

The Forest Service is expected to protect and use the forest resources. However, times are changing. It is not what can be extracted from the forest, but what can be preserved that is driving the economy. According to studies done by Headwaters Economics, rural counties with more than 30% of public lands protected have seen an increase in jobs by 345%. Compare this to an increase of 83% for areas without neighboring protected public lands. A final statistic worth noting is that for every 100,000 acres of protected public land, the per capita income is \$4,360 higher. (see West Is Best: Protected Lands Promote Jobs and Higher Incomes DECEMBER 2012 / SERIES at <https://headwaterseconomics.org/economic-development/trends-performance/west-is-best-value-of-public-lands/>) Creating highly protected public lands will boost the economy much like the timber industry did in the 1960's when timber brought a decent price at the mills. Times are changing and the CGNF needs to recognize this change and manage the forest accordingly. Federally protected lands are essential to the economic future of the West. Wilderness is the best protection for wild lands as human populations, mechanized recreation and global temperatures increase.

You will receive pressure from mountain bike groups who feel they have a right to ride anywhere regardless of the consequences to our ecosystem. The map below shows quite clearly in red that they have a multitude of roads and trails outside of the GYC and the WSA's and Roadless areas that need to be preserved and protected. If mountain bikers thought about the ecosystem and the ability of their grandchildren to enjoy clean drinking water, fish in a clear stream, see a grizzly bear outside of a zoo, find a good paying job close to home; I would hope these mechanized recreationists would sacrifice a few trails and support more wilderness designations.



Conservation Biology principles promote larger protected areas over smaller patches of habitat. Adding wilderness protection to roadless areas and nearly roadless areas that are contiguous to existing wilderness is the best way to enhance the conservation value of the

CGNF. This also promotes connected wildlife corridors necessary for species management and support. Therefore, I recommend the following wilderness designations in the CGNF.

GALLATIN RANGE

The total amount of roadless area in the Gallatin range that extends south into Yellowstone National Park (YNP) comprises over 546,000 acres. Only 251,700 acres were identified in the FS Wilderness Inventory. This includes the highly important Hyalite-Porcupine-Buffalo Horn WSA, an essential elk migration route.

Your plan has disqualified many areas using “purity” as the disqualification measure. If you consider wilderness as a place for animals, a cabin, or highway noise has little to do with habitat. It would be better to look at what these areas offer and why they should be protected rather than toss them out because of a structure or two. The Gallatin Range roadless area stretches to YNP allowing elk, bison, grizzly and other wildlife a corridor to expand and connect with other populations for future genetic vigor. The areas that are not being considered for wilderness designation offer exceptional habitat including the winter home of thousands of elk in the Porcupine-Buffalo Horn drainage. How will you protect elk security and hunting opportunity if you open this area to recreation?

How will you guarantee the genetic vigor of the GYC grizzly population if you open these roadless areas to recreation thus cutting off a necessary connectivity to the Northern Rockies populations? The GYC Grizzly delisting is being rethought after a court case concerning wolf delisting in Michigan. This plan should treat grizzlies as protected by the Endangered Species Act (ESA) and continue to create protected areas of connectivity regardless of whether the CGNF calls it confusing. It is not confusing. Grizzlies especially females need to be able to travel between GYC and the Flathead Lolo Forest in the Northern Rockies and Glacier and Canada. They do not travel well or do well around people, roads and trails. Neither do Lynx, wolverines nor many other endangered or soon to be endangered species. Roadless areas between these two grizzly populations should be protected to the highest degree: Wilderness designation.

According to Montana Fish Wildlife and Parks (MFWP), the Mol Heron, Tom Miner, and Rock Creek drainages support Yellowstone Cutthroat trout. They all flow from the Gallatin Range and should be protected as wilderness. At this time pseudo-science is coming up with ways to justify logging in watersheds even when it is highly known that the roads and damage done by logging is highly detrimental to the Endangered Cutthroat. How will you continue to protect this population from mechanized travel and road sedimentation if you do not designate these drainages as wilderness? How will the forest plan protect watersheds from alteration and damage?

The largest petrified forest in the world is found at the top of the Porcupine, Rock, Tom Miner, and Buffalo Horn drainages. It has already been highly compromised by collectors of all varieties. Wilderness designation would stop the devastation of a natural gem in the Hyalite. How will you protect this petrified forest from damage with a dwindling budget if you do not designate it as wilderness?

Since 1977 approximately 155,000 acres have been protected as The Hyalite, Porcupine and Buffalo Horn Wilderness Study Area, but really there are at least 230,000 acres that could be protected as wilderness. CGNF only recommends 85,000 acres and sadly recommended the Buffalo Horn drainage as a recreation area. The Buffalo Horn drainage is a tremendous habitat

area and might be the savior of grizzlies, lynx, and other listed and should be listed species. How will you uphold ESA recovery programs without this essential drainage?

For the sake of the grizzlies, the lynx, the fisher, wolverine and all other endangered species, species of concern and soon to be species of concern, I would recommend all roadless drainages to be recommended for wilderness. And please explain in your EIS how you will protect wildlife that cannot tolerate, propagate or thrive around roads without designating the highest protections for the remaining roadless areas.

MADISON RANGE

111,000 acres in the Cabin Creek Recreation and Wildlife Management Area is situated near Taylor Fork and Hebgen Lake. It is sandwiched between the Monument Peak area and the main crest of the Madison Range. This area is critical grizzly bear habitat. One would have to really manipulate science to delist a single part of the grizzly population considering the wolf case in Michigan. These bears will be further endangered due to global warming and dwindling food sources. This area must be protected as wilderness to keep this prime habitat pristine. How will you protect and bolster the grizzly population if you do not guarantee protections of this area with wilderness designation? This area would also be suitable for Bison, a species of concern, as the courts have recently ruled. This area also supports West Slope Cutthroat trout. There is ongoing biking and snowmobile use in the area, but this is not a reason to leave this area without protections. Wilderness has the ability to protect species of concern and endangered species by providing connective habitat for grizzly, bison et al. This area should be added to the Lee Metcalf Wilderness.

Grizzlies are also occupying and ranging in 43,000 acres of roadless area between Big Sky and Taylor Fork including Buck Ridge. I lived in Big Sky for a few years and know this beautiful area well. It should be protected within the Lee Metcalf Wilderness. How will you make sure grizzlies are not further endangered if you do not designate this area for wilderness?

Probably the most important area in the Madison Range is the 17,000 acres of roadless in the upper Cherry Creek and Spanish Creek drainages. This area would connect the Madison Canyon and Spanish Peaks as one continuous unit. This is connectivity of habitat. These are two more drainages that would preserve future drinking water. This area contains some of the best lower elevation big game habitat, and is used by several thousand elk. How will you promote elk security and hunting opportunity if you do not protect this area?

PRYOR MOUNTAIN RANGE:

The Pryor Mountain area is part of a larger roadless area that could be expanded and connected to Bureau of Land Management and Park Service lands. The more federal land management services can connect roadless areas, the better wildlife and valuable water resources will be served.. The FS recommends 6804 acres in Lost Water Canyon for wilderness. This designation could be extended in the Pryor Range with the closure of a few roads. Connecting roadless areas is essential to the future of our ecosystem. How will you preserve habitat, water and our ecosystem if you do not recommend wilderness designation here?

There are 10,421 acres in the Lost Water Crooked Creek area that is inventoried roadless. I support this area to be designated wilderness. This has already passed the House of Representatives in the Pat Williams' Wilderness bill in 1994. The Punch Bowl / Dryhead Creek

Canyons RWA could be converted to wilderness by closing a few miles of road. As many WSA's and wilderness areas were illegally and legally encroached upon in the past, it seems OK to close a few roads to gain wilderness and the protection of our future water supply and ecosystem in the wake of global warming. 12,000 acres of the Big Pryor RWA could be converted with the closure of a rarely used motorized trail. Finally, the Bear Canyon RWA would add another 10,000 acres to wilderness. There are no roads in this area.

CRAZY MOUNTAINS

It is a crime that the Crazy Mountains aren't filled with wilderness designations. Yet at this time there are none and the proposed plan does not recommend any wilderness for this unique and beautiful area. The Crazy Mountains are well known for high peaks, glaciers and a geological radiating volcanic dike system. The range is considered sacred to the Crow Tribe and the Crazy Mountains have been included in previous wilderness bills. Yet, no designation in this plan.

Part of the reasoning behind not recommending wilderness in the Crazies is that there are a few inholdings in the area. 90,690 acres are identified as roadless, considerably less than the 135,500 acres identified by the Forest Service as roadless in the 1980's. At least the 90,690 acres should be designated wilderness and really the full 135,000 acres identified in the 1980's as roadless should be designated wilderness.

ABSAROKA BEARTOOTH WILDERNESS (ABW) ADDITIONS

The Custer Gallatin National Forest encompasses portions of Absaroka-Beartooth wilderness as well as the Lee Metcalf. Now is the time to add to these amazing areas by designating connected roadless areas as wilderness. This will expand habitat security and migration corridors. I suggest adding the 32,983 acres of the 10,000 foot Line Creek Plateau that spills into the Shoshone National Forest. There is already a special designation for 16,000 acres of the area identified as the Line Creek Research Natural Area. Why not add wilderness protections around and in this special natural area? There is no time like the present.

I also recommend the following areas near the ABW for wilderness. (1) The 34,640 acres in the West Fork and Lake Fork of Rock Creek by Red Lodge and the Beartooth Front from Red Lodge to East Rosebud drainage adjacent to the existing ABW. The West Fork of Rock Creek is the municipal watershed for Red Lodge. Once again wilderness designations protect water for generations to come. (2) The 25,000 acre East Rosebud to Stillwater Roadless area along the Beartooth Front. (3) To the North, the 129,000 acre Deer Creek drainage between the Boulder and the Stillwater rivers which house Yellowstone Cutthroat Trout. (4) The 5,000 acre Mount Rae area between the Boulder and West Boulder Rivers is another wildlife mecca. (5) The 8,000 acre Tie Creek/Mission Creek/Livingston Peak including the north face of Shell Mountain which is part of the Livingston watershed. Little Mission and Mission Creek both harbor genetically pure cutthroat trout. (6) The 13,000 acres of roadless from Deep Creek to Strawberry Creek along the Absaroka Front. (7) Chico Peak, Emigrant Peak and Dome Mountain enjoy 56,000 acres of roadless area from Cedar Creek to Passage Creek in the Mill Creek drainage. Except for existing mineral claims, the entire area should also be added to the AB Wilderness. These lands are critical migration corridors and winter range for elk and bison moving north from Yellowstone as well as important grizzly bear habitat. Six Mile Creek has pure Yellowstone Cutthroat trout populations. If you want to prevent the extensive litigation and public outcry of a mine in Emigrant Gulch, designate the area as wilderness.

BRIDGER RANGE

The Bridger Range is an important wildlife corridor between the GYC and Central Montana. Connected Corridors are the only way to truly protect grizzlies from extinction. Without genetic vigor, they are lost. The range supports important winter deer habitat at lower elevations and its streams hold genetically pure West Slope Cutthroat trout and Yellowstone Cutthroat trout. 45,000 acres is roadless and surprisingly the FS did not recommend a single acre for wilderness. The area around Blacktail Peak in the northern Bridger Range has about a third of this roadless component and should be recommended for wilderness.

LIONHEAD

The 32,000 acre Lionhead roadless area is a critical corridor that links the Yellowstone Park area to the Lee Metcalf Wilderness. The CGNF has recommended nearly 18,000 acres as wilderness, though their 1986 Forest Plan had recommended 22,000 acres for wilderness. Thank you for including 18,000 acres in the Lionhead but this should be enlarged to the entire 32,000-acre roadless area.

REDUCING ROAD DENSITY

A policy that focuses on creating a minimum sustainable future road system should be included in the plan revision. Please consider the 5.2 billion dollar backlog in road maintenance (see FS-905) and budgetary constraints, as well as directives in the Forest Lands Management Act and the 2012 Planning Document.

It makes great sense to limit road building to the bare minimum by reducing or eliminating commercial logging projects and the road construction both temporary and permanent involved. I am concerned about language of “timber suitability” of the Hyalite timber stand. Yes the logs might be suitable for the mill, but the disturbance of logging in Hyalite will compromise scenic integrity and wildlife habitat and connectivity. As I stated earlier in these comments, the economics do not support continuing with timber harvesting. Neither does science or fire prevention. It is time to use tax dollars to improve habitat, protect watersheds, and practice true restoration to protect forests and habitat for future generations to enjoy, and to provide for the economic growth of nearby towns. Please stop misusing tax dollars to subsidize timber companies. Please explain how any timber project can actually pay for itself considering the current economy.

The CGNF needs a comprehensive plan to decommission, re-vegetate and remove roads from the system in order to lower the total motorized road density TMRD. Best available science shows that roads cause significant adverse impacts to National Forest resources. *See, e.g., 66 Fed. Reg. at 3208* (“Scientific evidence compiled to date [2001] suggests that roads are a significant source of erosion and sedimentation and are, in part, responsible for a decline in the quality of fish and wildlife habitat.”). Erosion, and compaction, associated with roads impair water quality and Cutthroat and other species viability. Roads disturb and fragment wildlife habitat and interfere with feeding, breeding, and nesting. This creates a loss of biodiversity. Roads facilitate increased human intrusion into sensitive areas, resulting in poaching of rare plants and animals, human-ignited wildfires, introduction of exotic species, and damage to natural resources like the petrified forest at the top of the Porcupine, Rock, Tom Miner, and Buffalo Horn drainages.

Climate change intensifies the adverse impacts associated with roads. As the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience. *See 2014 Literature Review at 9-14. See also USDA, Forest Service, National Roadmap for Responding to Climate*

Change, at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf> (recognizing the importance of reducing fragmentation and increasing connectivity to facilitate climate change adaptation). We will see more severe climate effects in the future putting more stress on roads that are not up to BMP standards.

Once again recommending the areas listed above for wilderness will assist in creating a minimum sustainable road system that complies with the Roads Rule (also referred to as “subpart A”) 36 C.F.R. §§ 212.1-212.21 (Administration of the Forest Transportation System), 66 Fed. Reg. 3206 (Jan. 12, 2001). The rule directs each National Forest to conduct “a science-based roads analysis,” generally referred to as a travel analysis report. 36 C.F.R. § 212.5(b)(1).¹ Based on that analysis, forests must: (1) identify unneeded roads for decommissioning or to be considered for other uses, 36 C.F.R. § 212.5(b)(2); and (2) identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest system lands, *Id.* § 212.5(b)(1).

The components of a minimum sustainable road system must be designed “to maintain or restore the structure, function, composition, and connectivity” of terrestrial, riparian, and aquatic ecosystems, *id.* § 219.8(a)(1) & (a)(3)(i); must take into account stressors including climate change, and the ability of ecosystems to adapt to change, *id.* § 219.8(a)(1)(iv); and must implement national best management practices for water quality, *id.* § 219.8(a)(4). The rule also requires the Forest Service to establish riparian management zones for which plan components “must ensure that no management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment that seriously and adversely affect water conditions or fish habitat shall be permitted.” *Id.* § 219.8(a)(3)(ii)(B). Please take all this into consideration as you create the plan that will develop the future of the CGNF.

Adopting road density thresholds for particular parts of the landscape or forest matrix is one of the most effective strategies for achieving an ecologically sustainable road system. *See* 2014 Literature Review at 6-8 & Att. 2 (summarizing best available science on road density thresholds for fish and wildlife). Road density thresholds are critical to protecting important watersheds, migratory corridors and other key wildlife habitat. There is a direct correlation between road density and various markers for species abundance and viability. *See* 2014 Literature Review at 7-8; *see also* FSH 1909.12, ch. 10, § 12.13 & Ex. 01 (identifying road density as one of the “key ecosystem characteristics for composition, structure, function, and connectivity” used to assess the “status of ecosystem conditions regarding ecological integrity”). Plan components should incorporate road density thresholds, based on the best available science, as a key tool in achieving a sustainable minimum road system that maintains and restores ecological integrity. *See* FSH 1909.12, ch. 20, § 23.23l(2)(a) (desired condition for road system may describe desired road density for different areas). In doing so, it is critical that the density thresholds apply to all motorized routes, including closed, non-system, and temporary roads, as well as motorized trails. *See* 2014 Literature Review, Att. 2 (describing proper methodology for using road density as a metric for ecological health).

In addition to route density, scientifically credible, landscape-scale measures of risk to aquatic integrity include miles of road connected by direct surface flow to streams and the number of road or stream crossings by subwatershed. *See* USDA Forest Service (2012). Travel Analysis Process: A Guidebook. Guidance for Region 5 Forests to Complete Travel Analysis.

Available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5435022.pdf. The revised plan should include plan components focused on restoring aquatic and terrestrial habitats and habitat connections by, in part, reducing stream crossings.

WILDLIFE SECURITY

The January 2018 court ruling that USFWS illegally denied ESA protections for the Yellowstone National Park Bison population must change the findings of the CGNF and reinstate the Bison as a species of concern and all of the protections this would entail including habitat security and connectivity so Bison can roam out of the park and expand populations. This is in direct controversy with grazing allotment management plans.

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.

GYC Grizzly bears have recently been taken off the ESA list, but the Humane Society vs. Zinke case has brought that decision into question. All precautions to protect grizzly food sources and habitat connectivity should be maintained in this plan as if the GYC Grizzly population is under ESA protections. Once again, recommending more wilderness designations will assist in this matter, as will reducing and refining the road system.

Federal Land management plays a vital role in protecting and creating connectivity between habitats. This is a win win situation because in the plan under “scenery” you state, “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” (see pg 85). Creating habitat connectivity will preserve these scenic viewsheds for the public enjoyment for years to come. Please include this statement or acknowledge its importance in the wildlife management section of the plan.

The plan should also describe a plan to maintain healthy habitat for Lynx. This would mean reducing roads and alterations to the landscape, protecting old growth, and recommending wilderness designation for as much land as possible.

Healthy streams that support Cutthroat, Bull trout and spawning species should be a priority of the plan as it supports a clean water system. Both the trout are protected as well as our clean drinking water.

Finally wildlife security especially elk security are a major concern to the CGNF because under the multiple use mandate, you must preserve hunting opportunities. How will you maintain hunting opportunity and elk security with a large lower elevation recreation area? Recreation, especially that of the motorized and mechanized variety, cause elk to move to more secure areas in the high country at an earlier time, reducing hunting opportunity.

OLD GROWTH

A specific protection for old growth forests and old trees should be in place in the forest plan for any restoration project or alteration of the forest of any kind. Old growth forests and old trees are vital to wildlife and the natural processes of the forest ecosystem. They should be left untouched. Even diseased old trees should be left to become snags and vital habitat. These trees should be defined as over 120 years old and should be documented and inventoried on the forest for future protection. Andrew Larsen of University of Montana Forestry department recommends leaving all old trees in any forest restoration project. They cannot be replaced. Once they are gone, they are gone. They must be considered a vital part of the forest and an endangered part of the forest to be cherished and protected.

Thank you for reading my comments. I look forward to being a part of your continued planning process.

Sincerely,

A handwritten signature in dark ink on a light brown background. The signature is cursive and reads "Michele Dieterich".

Michele M Dieterich

Attachments:

FS-905

Best of the West: Headwaters Economics

FS Water Climate Change and Forests

TWS A Literature Review May 2014