June 5, 2019

Attn: Forest Plan Revision
Custer Gallatin National Forest
10 E Babcock, P.O. Box 130
Bozeman, MT 59771
cgplanrevision@fs.fed.us

Re: Custer Gallatin National Forest Draft Revised Forest Plan

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Custer Gallatin National Forest Draft Revised Forest Plan (Plan). The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. The majority of wild free-ranging elk in the United States spend a portion of their lives on National Forests and Grasslands. Maintaining and enhancing elk country benefits a wide variety of wildlife including big game, upland game, waterfowl, song birds, and many aquatic species, as well as resources beyond wildlife.

RMEF's 234,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forests. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.4 million acres of North America's most vital habitat for elk and other wildlife, including over 850,000 acres in Montana. As such, RMEF has an interest in ensuring the future productivity of elk and other wildlife in Montana.

RMEF recognizes that the Forest Plan Revision Process under the 2012 planning rule is designed to emphasize restoration of natural resources to make our National Forests more resilient to climate change, protect water resources, and improve forest health. We request that the following recommendations be incorporated into the draft Revised Custer Gallatin Plan and in subsequent project design and implementation:

Inclusion of elk and elk habitat in planning efforts

- Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, and cultural and economic goals of the Forest. Because of this, RMEF suggests that elk and elk habitat be considered a focus for management planning efforts, rather than lumping elk into a general 'big game' category (Section WLBG). Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Custer Gallatin (viewing, hunting, etc.). While elk and other big game currently meet population objectives across much of the geography, history has shown the importance of maintaining those populations and including language in the Plan to support populations going forward.

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

- The draft EIS recognizes, 'In summer, nutritional value of forage is particularly important to elk, especially for females with young under the high nutritional demands associated with lactation,' and 'Optimal summer nutrition areas for elk are relatively rare on the Custer Gallatin…' However, the Plan has no focus on providing quality summer forage for elk. RMEF recommends use of recent research (Rowland et al. 2018) to develop Desired Conditions, Goals and/or Guidelines for increasing and maintaining summer nutrition areas on the Custer Gallatin.

Actively managed landscapes

- Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, lack of dependable water sources, and many others. RMEF supports use of the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Quigley and Wisdom 2015). More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Wisdom et al. 2018), and elk security (Ranglack et al. 2017, Wisdom et al. 2018) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes be incorporated into the Plan.
- Early seral forest provides important habitat for elk and other wildlife, and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early successional stages across the National Forest System. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees which provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but can help reduce the threat of catastrophic wildfire in the future. RMEF supports this work which complements Forest Service efforts around fire, fuels, and vegetation management.
- RMEF supports balanced use of timber production and encourages consideration of wildlife habitat enhancement through timber production activities. All Alternatives presented in the Plan seem to have similar acreages that are suitable for timber production. RMEF supports opportunities for timber production, which can provide greater flexibility in using the full array of active vegetation management activities to more effectively achieve desired vegetative conditions.
- The majority of recommended wilderness area and backcountry area allocations across the Alternatives appear to fall within higher elevations on the Custer Gallatin. Elk and other big game tend to utilize higher elevations during the warmer summer seasons and transition to lower elevations during the winter. Wilderness designation presents a concern, as these acres are not eligible for various active management activities. RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. As such, RMEF supports the management direction within Alternative E, for no acres in wilderness designation. In addition, the draft EIS indicates that land allocations proposed in alternatives B through E would help maintain habitat connectivity within and between the

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

Custer Gallatin, which would support Montana Fish Wildlife & Parks' (FWP) priority big game winter range from Yellowstone to the Paradise Valley. However, FWP's State Action Plan for priority big game corridors and winter range (Montana FWP 2018) identifies fragmentation of private lands, noxious weeds, and wildlife collisions as the risks/threats to this priority area. Thus, wilderness designations would not improve or maintain this priority winter range area.

- Noxious and invasive plants are slowly replacing native forage for elk and other species. RMEF encourages the Forest Service to actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remains a critical component of effective weed management (Westbrooks 2004); RMEF encourages this collaborative approach for prompt containment and treatment of noxious and invasive plants. Native plant communities provide the highest nutritional value, thus RMEF encourages the use of native plant seed mixes. Given that there is a greater area needing treatment than resources available, prioritization of weed treatments should occur with consideration for elk and other wildlife habitat.
- Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the Forest Service to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.

Resource management across land ownership

- Public lands are where the majority of the public hunts and otherwise enjoys elk. In some places a growing portion of elk are using private land. Where elk populations are at or over population objectives, RMEF suggests considering elk occurrence specific to USFS lands. In many situations the geographic units used to monitor elk population objectives are comprised of varying amounts of private ownership. The numbers may not reflect elk use of USFS lands. An area can be over objective, with relatively low occurrence of elk on National Forests. RMEF recognizes that some factors affecting elk distribution off of Forest Service lands are not due to Forest Service management.
- The draft EIS indicates that '…elk winter range is a limited extension of primary winter range in the valley bottoms, the majority of which is often on private land,' and 'In some areas of the Custer Gallatin, big game (most notably elk) distribution has become a management concern, as elk are spending significant amounts of time on private lands.' While multiple factors can affect distribution of elk and other big game across public and private lands, RMEF recommends inclusion of Desired Conditions that emphasize coordination between Custer Gallatin National Forest, FWP, and private landowners to provide habitat conditions that support year-round presence of elk and other big game on the Custer Gallatin.

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

- Each year, our National Forests become more critical to elk and other wildlife due to habitat loss on private land. When privately owned wildlife habitat within or immediately adjacent to the National Forest becomes available for purchase, we urge the Custer Gallatin National Forest to work with RMEF and other national and local conservation groups to acquire parcels, enter into land exchanges, or obtain conservation easements to secure more elk habitat for the future.

Management of motorized and non-motorized recreation

- Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. Research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports Plan components that maintain secure habitat for big game and adjusts management activities in order to help reduce displacement of ungulates during crucial times (in Guidelines FW-GDL-WLBG). However, while timing and routes for management are considered, the Plan does not provide (and RMEF recommends) a strategy for addressing potential recreational impacts to big game during stages when animals are more vulnerable to disturbance (i.e., elk calving or while on winter range). This is especially important in the Gallatin and Bridger mountain ranges as well as Absaroka-Beartooth and Crazy mountains with increasing year-round recreation in the backcountry.
- While RMEF supports the management direction provided in Alternative E for no acres in wilderness designation, a balanced approach among Alternatives is recommended regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round, and RMEF recommends the Custer Gallatin provide access to the Forest for those seeking varied experiences (primitive and roaded). However, RMEF recommends inclusion of Desired Conditions, Goals, and/or Guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic).

Public access and hunting heritage

- For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. The Forest Plan should provide for the continuation of public-land hunting, fishing, trapping, and recreational shooting as a valid and vital component of the recreation spectrum.
- RMEF encourages public land access and hunting heritage for inclusion in Forest Plan Revisions. Executive Order 13443, "Facilitation of Hunting Heritage and Wildlife Conservation" (2007), directs federal agencies to emphasize the enhancement of hunting opportunities on federal lands. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable MOU between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the parties at all levels for planning and implementing mutually

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

beneficial projects and activities related to hunting, fishing, trapping and shooting sports conducted on federal land.

- RMEF appreciates recognition of hunting, trapping, and fishing as contributing to local economies, as well as the well-being and quality of life of Custer Gallatin users (in Desired Conditions FW-DC-SUS). RMEF recommends inclusion of shooting sports as an important recreational activity on the Custer Gallatin

RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in forest plans and project design, we recommend that current and future forest planning efforts are coordinated with state wildlife agencies and that state agency goals for elk are integrated into the plan.

Sincerely,

Blake L. Henning
Chief Conservation Officer

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG