

**Custer Gallatin Working Group  
128 South Main St.  
Joliet, Montana 59041**

**Comments Submitted by June 6, 2019  
DRAFT REVISED FOREST PLAN-CUSTER GALLATIN NATIONAL FOREST  
March 2019 Draft**

The following comments on the Custer Gallatin National Forest (CGNF) 2019 Draft Revised Forest Plan (Draft Plan, Plan) are respectfully submitted by the Custer Gallatin Working Group.

The CGWG thanks the CGNF for considering our comments submitted on March 5, 2018, and for incorporating a number of these comments into the March 2019 Draft Plan. While we are disappointed that more of our previous concerns were not addressed, we understand that the initial draft document has received many comments, and that the CGNF has necessarily attempted to balance the various and conflicting philosophies and interests represented by a wide range of commenters. Accordingly, while we have not repeated our earlier comments in this iteration of review, we have restated a small number of concerns about which we feel strongly, and hope that the CGNF will weigh these concerns appropriately.

Riparian Management Zones (RMZ)

The Riparian Management Zone section addresses important management around sedimentation, ground disturbance, chemicals and flora and fauna. The Custer Gallatin Working Group would also like to see an additional point for suitability addressing buildings and structures in the Riparian Management Zone. Our suggested language is: 03 In order to minimize impacts, new buildings or other structures associated with developed sites are not suitable within inner RMZs.

Conservation Watershed Network (CWN)

Thank you for including maps of the conservation watershed network to support the explanation of the network included in Appendix C of the draft revised forest plan as requested in our scoping comments. We support the concept of a conservation watershed network to protect native fish and help maintain healthy watersheds and river systems.

However, the CWN section of the plan (2.3.7) only contains three Plan components: one desired condition, one objective, and one guideline. We are concerned this may not provide adequate safeguards to ensure that the CWN fulfills its intended purpose. Presumably, the Plan's protective designations (Inventoried roadless areas, designated wilderness, etc.) provide adequate protections for these watersheds, but there is no analysis to indicate this is the case. We suggest the Forest Service conduct an additional GIS analysis to evaluate the extent to which CWN watersheds fall within these

designations and are protected by their Plan components. If there are gaps in protection revealed by this analysis, additional Plan components should be developed for this subset of CWN watersheds

### Fire and Fuels

We repeat our previous comment that FW-DC-FIRE 02 should insert the underlined text, to read:

“Vegetation conditions (composition, structure and function) support natural fire regimes except in municipal watersheds, the wildland-urban interface and adjacent to infrastructure where vegetation conditions support low-intensity fire where necessary in order to reduce negative impacts to values at risk.”

As an amended restatement of another previous comment, FW-GO-FIRE 02 should insert the underlined text, to read:

“The Custer Gallatin National Forest coordinates fire management actions with State, local, tribal and adjacent Federal agencies. Additionally, the Forest Service has an obligation to work with impacted communities and forest service users (ie: grazing permittees) to minimize adverse impacts in localized areas”

Similarly, FW-STD-FIRE 01 should insert the underlined text, to read:

“All wildfire shall have a management response that considers risk to life and safety, taking into account the costs and effects to resources and values at risk, including those of permitted stakeholders.”

Also, FW-GDL-FIRE 02 should insert the underlined text, to read:

“To reduce the negative impacts of wildfires to values at risk, improve fire control opportunities, or decrease risk to fire personnel and the public, fuels treatments, including grazing, should be designed to remove or rearrange the live and dead vegetation as necessary to reduce fire intensity.”

FW-GDL-FIRE 03 should insert the following text:

“Minimum Impact Suppression Tactics (MIST) should be utilized generally as a best practice where applicable.” This requirement would remain qualified under the existing “exceptions” language.

In general, given the extensive history of fire suppression on the CGNF, we are concerned that the Plan is overly focused on maintaining status quo resource conditions. While we understand that the Plan is programmatic in nature, and is not intended to present specific resource plans for each geographic component covered by the Plan, we believe that the CGNF should contain a stronger emphasis on fuels management through managed fire, mechanical treatment, and other approaches that may be appropriate for each targeted management area. We do believe, however, that the Plan’s emphasis on fuels management is appropriately directed toward the Wildland-Urban Interface, while allowing more natural conditions to prevail in backcountry ecosystems.

### Invasive Species

FW-GDL-INV should be relocated as new FW-STD-INV 06, with “should” amended to “shall”.

We repeat our previous comment that FW-OBJ-INV 01 should specify at least 4,000 acres of inventoried acres, rather than the previous “4,000 acres” or the current “2,500 to 4,500 acres”, and restate our recommended objective of “minimum of 4,000 acres”. The Custer Gallatin Working Group recognizes that the range of acres treated doesn’t limit the Forest Service from treating more acres above the 4,500 but we want to encourage at least 4,000 acres treated. Further, we recognize that costs are a factor, as are impacts to other areas of work being done in the forest. We would like the Forest Service to work with the Custer Gallatin Working Group to weigh the costs and benefits of additional weed treatment in the forest.

#### Wildlife

While FW-DC-WL 08 addresses the “risk of disease transmission between domestic animals and wildlife”, there is no acknowledgment of the potentially serious risk to wildlife from chronic wasting disease or other prion-related diseases.

The Plan should also focus more attention on the nexus between wildlife security and pressures associated with increasing recreational demands on the Forest. Both recreation and resource management activities can also have significant impacts on habitat connectivity.

FW-DC-WL 08 should also note that the Forest Service will consider and, where possible, address grazing permittee concerns regarding fencing and disease issues related to the presence of bison in adjacent allotments.

#### Permitted Livestock Grazing (GRAZ)

In our previous comments, we recommended the insertion of FW-GO-GRAZ 03: “Livestock grazing will not be reduced to provide additional forage for wildlife when the wildlife population is determined by the Montana Department of Game and Fish to be over target levels.” We repeat this comment.

#### Timber (TIM)

Table 15 should include the number of acres in the Wildland Urban Interface, and how many acres of Forest lands suitable for timber production are in those areas.

#### Energy, Minerals, and Geologic Areas of Interest (EMIN)

We repeat our recommendation to add new section: Suitability (FW-SUIT-EMIN) 01 Areas with a ROS classification of primitive and semi-primitive are not suitable for new mineral or energy management activities, subject to existing rights.

#### Administrative Facilities (FAC)

We repeat our recommendation to add FW-DC-FAC 04 Facilities are constructed and maintained in accordance with the Recreation Opportunity Spectrum.

#### Inventoried Roadless Areas (IRA)

The FS should acknowledge that grazing is an allowable use in Inventoried Roadless Areas where it is currently permitted.

#### Research Natural Areas (RNT)

We repeat our recommendation to add FW-SUIT-RNA 03 New oil and gas leasing is not suitable within RNAs.

#### Special Areas (SA)

We repeat, with slight change in reference, our recommendation to add FW-SUIT-SA 01 New oil and gas leasing is not suitable within SAs.

#### National Recreation Trails (NRT)

The mileages of NRTs listed in Table 26 need to be validated, as the mileage for the Big Sky Snowmobile Trail alone appears to be inaccurate. Further, DEIS Table 178 (which contains parallel information) should also be validated, both for mileages and for the changes to uses by alternative.

#### Recommended Wilderness Areas (RWA)

We repeat, for consistency with our comment on Designated Wilderness, our recommendation to add FW-STD-RWA 07 Opportunities for new commercial filming and still photography may be considered so long as these activities do not conflict with or detract from desired conditions.

#### Backcountry Areas (BCA)

The FS should acknowledge that grazing is an allowable use in backcountry areas where it is currently permitted.

#### Recreation Emphasis Areas (REA)

We repeat our recommendation that the Plan needs objectives in this area, for example: objectives tied to monitoring use and conflict between people and wildlife; monitoring how wildlife is impacted by human uses; monitoring resource damage; adequate parking; and maintenance.

Thank you for the opportunity to comment on the Revised Draft Forest Plan.

A handwritten signature in black ink that reads "John E. Prinkki". The signature is written in a cursive, flowing style.

John E. Prinkki, Chairman

Custer Gallatin Working Group