Nancy Hilding President Prairie Hills Audubon Society P.O. Box 788 Black Hawk, SD 57718 nhilshat@rapidnet.com 605-787-6466 June 6th, 2019

Mary C Erickson, Supervisor Custer Gallatin National Forest 10 E Babcock (P.O. Box 130) Bozeman, MT 59715 406-587-6735 cgplanrevision@fs.fed.us

Comments on the Custer-Gallatin National Forest Draft Revised Plan, Draft Environmental Impact Statement (DEIS) for the Draft Revised Forest Plan and associated documents

Prairie Hills Audubon Society,

We incorporate by reference and by permission the comments of Western Watersheds Project, on the Custer-Gallatin National Forest Draft Revised Plan, the DEIS for the Revision & associated documents, which Western Watersheds were planning to send in today.

Draft Plan Revision Comments

Comments on specific paragraphs in the Draft Plan Revision:

1.5.1 Distinctive Roles and Contributions within the Broader Landscape - Social and Economic Characteristics Page 9 in the third paragraph - add [scenic beauty] "In addition to timber, rangelands, and minerals, popular species and biological diversity & <u>[scenic beauty]</u> on the forest contributes to the economic sustainability of communities through ecotourism, wildlife viewing, hunting, and fishing."

2.3.2 Air Quality (AQ)

Page 17-18: Should this section include a discussion of risks of inhalation of radionuclides at abandoned uranium sites, or in sediments deposited downstream? Please discuss if SD air quality laws are sufficient on radio-nuclides.

2.3.3 Soils (SOIL)

Page 19, "Desired Conditions for 04 Coarse woody debris" This needs a clause, requiring that sufficient woody debris, to meet wildlife habitat needs, will be provided.

3.2.6 Other Resource Emphasis Areas

Recreational Opportunity Spectrum

Table 32.

Page 141

We find it unfortunate that only Alternative D has any non-motorized ROS classed area and that it is only 2,235 acres. We hope in the preferred alternative you will provide some non-motorized ROS classed acres for Sioux Ranger District and that Alternative D would have more acres. People in SD, who value primitive non-motorized settings need some place to go, where they are assured of a quiet and undisturbed visit.

Scenic Integrity Objectives

Table 35.

Page 142

There does not seem to be any difference between alternatives on the Scenery Management System (SMS) values. We believe some of the rock features in Slim Buttes to be lovely & we question how the SMS values were chosen. It is not clear enough in the DEIS, which refers to a report from 2017. We hope in the preferred alternative you find some "very high" SIO values & some variation in SIO values between alternatives.

Comments on DEIS

The document should have greater discussion of the existence of the lake chub in Custer National Forest (CNF) and nearby HUCs. This fish is at risk of extirpation from SD and CNF location(s) may be all that is left in SD & thus more special. It is a sensitive species in Region 2, I don't know about Region 1.

Please discuss whether Sioux Ranger District Units could support resident or breeding mountain lions, if state(s) did not allow such aggressive hunting of them.

Please discuss if SD water quality laws on radionuclides are sufficient to protect water downstream of abandoned uranium mines in SD.

Thanks for the opportunity to comment,

Nancy Hilding

Norm Shed

President Prairie Hills Audubon Society