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Mary Erickson, Forest Supervisor
Custer Gallatin National Forest
Forest Supervisor's Office
10 East Babcock
Bozeman, MT 59715

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND THE DRAFT REVISED FOREST PLAN FOR THE CUSTER GALLATIN NATIONAL FOREST

Hello,

Native Ecosystems Council (NEC) and the Alliance for the Wild Rockies (AWR) would like to submit the following comments on the proposed Revised Forest Plan for the Custer Gallatin National Forest.

1. Fire and Fuels

The proposed alternatives proposed removing fuels on from 4,000 to 7,000 acres. There is no indication in the RFP of FEIS that these projects will remove from 4,000 to 7,000 acres of wildlife habitat. The understory vegetation is an essential component of forest environments. This proposed removal will have devastating impacts on most forest wildlife species. The rationale for this is never defined in the RFP. The RFP should clearly state that the priority management is to reduce fuels and reduce wildlife habitat.

2. Carbon Storage

The RFP has completely ignored the problem that forest management creates in increasing carbon in the atmosphere, and exacerbates climate change. The long-term impacts of climate change on forest environments and wildlife that will be exacerbated by the proposed logging/ burning program for the Forest needs to be addressed as per the National Environmental Act (NEPA) as part of the rationale for developing various RFP direction/goals.

3. Weeds

Noxious weeds are an ever-growing problem on public lands, in part due to disturbances caused by vegetation treatments. The proposed logging/burning program will most surely create huge increases in noxious weeds. Currently the agency budgets are limited for weed treatments, which is why weeds continue to increase on these forests. The connection between disturbances and increases of weeds is never made in the RFP when massive treatment programs are being proposed by alternative. This is a violation of the NEPA. The RFP should clearly state that weeds will drastically increase in this new planning period.

4. Shrubs and Woodlands, and Riparian

The RFP states that conifers are a threat to grasslands and riparian areas, without providing any overview as to what the level of grasslands are that are threatened, and why there are too many conifers, both in shrublands and riparian areas. The RFP needs to identify briefly what the adverse impacts on conifer removal will be to the public as a part of this program, instead of implying that all effects are beneficial. For example, why don't wildlife use conifers in riparian and ecotone areas? Why don't conifers provide shade and coarse woody debris in riparian areas? What are the benefits that these programs are striving to achieve that are more important than the adverse impacts?

This section implies that wildfire destroys the structural complexity of forest ecosystems. This is a ludicrous claim used to justify management intervention. And the usual "mix of seral age classes in sagebrush" appears in this section. When will the agency stop using this claim, which has no biological merit, but instead is based on increasing forage for cows?

This section makes it rather difficult for the public to understand what the agency's agenda is in regards to various shrubs, which is to get rid of them to make more grass for cows. It does not, however, ever indicate to the public why shrubs are bad and need to be removed. And there is that tireless term the agency constantly uses, or "resilient." Why is burning shrubs in grasslands and ecotones make it more resilient? What does this mean?

The section that is most objectionable is the plan to clear trees out of ecotones, including juniper and limber pine. These are highly valuable trees

for wildlife, and the RFP does not identify this or why they are creating problems for wildlife that need to be addressed. Simply stating what the proposed program is does not satisfy the requirement to define what the basis of the program is.

As for aspen and willow, the RFP ignores the severe impact that cattle are having on this priority species. How can you implement a management program when the major problem is not even going to be addressed? We should also note that mixed conifer/aspen stands have high diversity and provide high quality wildlife habitat. The benefits for removing conifers is unclear. Management of aspen and willow requires utilization limits from grazing, not logging and burning.

We note that the RFP allows new roads in aspen stands and riparian areas. This is typical of the wide-ranging "loopholes" that are in the RFP. There can always be some excuse to justify roads in these areas. Why shouldn't this just be a standard?

5. Riparian Management

There are no standards for this key habitat. What is most disturbing is the allowance of "restoration" activities, including logging, burning, snag removal, pesticides, livestock trailing, new roads, fire lines, stream crossings, skid trails and landings in riparian areas. Nor are there any desired conditions for wildlife, even though riparian areas are key wildlife habitat, including dense old growth with many snags. Riparian areas are also essential for fisheries, including shade and coarse woody debris. It is not clear how logging fits in with maintaining snags, old growth and logs in the stream. The RFP clearly does not protect riparian areas if agency plans logging activities, including salvage. Although the RFP states that riparian areas are classified as "unsuitable" for timber, it is also noted that logging is okay if there are wildlife benefits (i.e., "enhance" habitat). It does not actually mention what these benefits will be. If all this information is supposed to be provided at the project level, then what is the purpose of the RFP? The RFP needs to provide specific criteria for what constitutes restoration of wildlife and fisheries habitat in riparian areas, so that the public can understand how this will be implemented.

6. Conservation Watershed Network (CWN)

In this section, it is never made clear why stream crossings can improve the ecological function of streams. The public needs to know exactly what this means.

7. Terrestrial Vegetation

This section leaves out two important "at risk" tree species in addition to whitebark pine. These are limber pine and aspen. Limber pine is vulnerable to vegetation treatments in ecotones, with it already being impacted by pine beetles Aspen is being destroyed by livestock. Why isn't there any recognition about the problems these 2 species are facing? Also, the science behind proposed treatments for whitebark pine is not really clear. And the RFP does not really protect whitebark pine if other actions are preferred. It can be burned, logged, and have fire lines built through it. How have previous treatment projects for whitebark pine worked? Is the RFP being built on past successes or past failures?

8. Forested Vegetation

The age-old recommendation that there be seral age classes for diversity is of course provided in this section. The importance of this to wildlife is never addressed, including fragmentation and the loss of the most essential, productive older forest habitat. The RFP should not make claims that diversity is important without saying why. What is also disturbing is the term "natural range of variation." This is a meaningless term that the agency is using to justify all the proposed management objectives for logging. This term has no meaning to the public. And if it were even remotely actually used, where is the historical levels of old growth ranging from 20-50% mentioned? If the agency is striving for RNV, what about old growth?

Other meaningless term is "resilience." This suggests that the only way forests can survive is via logging and burning, or otherwise they would all be gone. Not clear how forests ever got here in the first place in the last 10,000 years since the last ice age. The terms resilience and RNV are a violation of the NEPA because they cannot be quantified to the public to define how they are being used in management proposals. Instead, they are smoke screens used to give the appearance that logging and burning programs are valid actions. Why doesn't the RFP provide a brief summary as to why logged forests are resilient while unlogged forests are no resilient,

in order to provide some demonstration to the public as to what this program is based on?

Table 6 at 35 does not include old growth as a successional stage. A few large trees are not old growth. What is the purpose of having a range of tree densities for wildlife? Why should forest stands be resistant to insects and disease? In other words, why should forests lack dead trees? How does this fit with wildlife management? Also, how does this range of tree densities fit with habitat types? It looks like habitat types information has been thrown out in order to justify logging.

In Table 7 in regards to canopy cover, again there is no information as to how these targeted canopy densities relate to wildlife. These various density classes will require massive thinning programs, but the rationale as to why these are required for wildlife is never provided.

This section of the RFP basically claims that in order for the Custer Gallatin National Forest to be healthy and resilient, it will require massive intervention to change existing conditions across much of the Forest. However, the reason why existing conditions are creating huge problems that will require massive intervention to correct are never identified. What are the specific wildlife problems that need to be addressed, and how has this been determined? If wildlife is not the underlying rationale for massive treatments and huge changes in forested ecosystems, then what is? As an example of the massive intervention apparently required, the Warm Dry Montana forests could go from the existing 45% of the landscape down to 5% of the landscape., or almost be eliminated. The Cool moist habitats could be reduced by half, or go from 60% down to 30%. It was never made clear as to what the specific rationale for massive changing in the existing forest conditions was. Simply referencing RNV does not provide any information to the public about why such massive intervention is needed. This is one of the major flaws of this RFP. It looks like RNV is some vague rationale that is being used, along with fire prevention, to justify to the public why wildlife habitat will have to be extensively removed in the upcoming planning period.

9. Snags and Old Growth

There are no actual snag guidelines in the RFP, even though at least 25% of forest birds require snags at some stage of their life cycle, as do many of the

bats that occur on the Forest. The agency shows its complete lack of commitment to snag management and these many species by using a snag strategy that was identified as invalid 20 years ago. Management recommendations for snags has clearly demonstrated that snags are required within forest stands, and for many species, the snags have to be in dense forest stands. A conservation program that makes it optional that a few snags be left somewhere in the project area does not address conservation of this large suite of species. The current best science clearly demonstrates that "woodpecker management areas" need to be provided across the landscape, and be large enough to allow natural processes, such as bark beetle epidemics, to occur over time without intervention by humans. Bark beetle epidemics as well as wild fire are both essential processes in snag management, and neither process is noted in the RFP. These processes are essential in providing the high number of snags that are required to ensure that at least some are suitable (i.e. 100 or more per acre).

The RFP was not very clear on the exclusion of lodgepole pine forests to be included in snag management. This is a disturbing action, as old growth lodgepole pine, or young stands infested with pine beetles, are essential for many cavity-nesting birds. The exclusion of snag management in lodgepole pine stands appears to be based on the expectation that these stands will be heavily clearcut to "restore" forests.

This raises the issue of old growth. The glossary and the RFP both note that old growth is being defined as a few trees, or the minimum number of trees identified to be included in old growth stands by the Region 1 criteria. If old growth is going to be defined as just a forest type, and not wildlife habitat, then this definition would be suitable. However, the RFP needs to clarify that the proposed definition, and allowance of extensive treatments in old growth, will not maintain any old growth species.

The snag management program does not require a long-term maintenance of snags, just a few snags after logging. How is this a conservation plan for wildlife? What will they do when the snags left after logging fall over?

Tables 8 and 9 in the RFP at 37 are a violation of the NEPA. It will be impossible for the public to understand how many snags are going to be managed for. Any project area will meet these desired conditions, they are so minimal – at least 1 snag per acre averaged across the landscape. It is not

clear how these desired conditions provide proxies for snag-associated species.

10. Fire again

Table 10 at 38 is also a violation of the NEPA. There is no way the public can understand what this means for a management program. It does, however, demonstrate that the Forest Service is planning a massive prescribed burning program, which will be a massive elimination program for wildlife habitat. Fuels are in fact wildlife habitat! The impacts could be catastrophic. For example, in the Warm Dry Pine Savanna type, the existing percent of area burned is 9%, but it could go up as high as 75% in the RFP. Low severity fire in warm Dry-montane habitats currently occurs on 3% of the area, but could be increased to 15%.

The burning program is expected to reduce contiguous patches of mid-sized closed canopy forest, but the reason why this is needed for wildlife is not mentioned. It is also not clear why wildlife need an increase in early seral forest stages. Nor is it clear why old growth is going to be managed for "future old growth," instead of current old growth via burning.

In regards to patch size, the RFP indicates that clearcuts have the same habitat values to wildlife as areas burned by wild fire, which is apparently the reason that openings up to 1,000 acres are planned. Again, Table 11 is a violation of the NEPA by making it impossible for the public to understand what the proposed management program is. Nor is there any supporting information in the RFP as to how these desired patch sizes up to 1,000 acres are needed by wildlife.

Table 12 talks about "large tree structure," without identifying what the basis for the desired conditions are. This is not old growth, as it could be a stand with just 5 trees per acre, which is essentially a clearcut. The RFP indicates that these desired conditions are based on RNV. Again, RNV is being used to justify desired objectives for forest management that remain undefined to the public. What is clear that the agency once again is claiming that the habitats on the Forest are severely altered from natural conditions, and thus need massive intervention to correct the problems. As with other sections of the RFP regarding requirements for massive intervention, there is no connection made between wildlife habitat needs and these restoration needs.

Table 13 supposedly defines desired conditions for old growth forests. There are no desired levels of old growth by vegetation types. Thus the RFP fails to require any level of this key habitat for wildlife. Some old growth types are clearly very low, such as in Douglas-fir forests at 4%, and warm dry-pine savanna (3%). The level recommended by the current best science (20-25%) is not being met on the Forest, nor in 2 of the lower elevation vegetation types so important to wildlife, although it is at better levels in lodgepole pine vegetation types. Since no protections exist in the RFP for wildlife old growth habitat, and no desired levels are even identified in Table 12, one can see that old growth wildlife species are going to be adversely impacted by implementation of the RFP.

The information provided on old growth in the RFP is a violation of the NEPA and the NFMA. The landscape scale is too large, even if old growth were summarized by these areas. The distribution and amounts of old growth habitat need to be defined by a reasonable area of the landscape, the type of old growth quantified, and mapped so that the public can understand how old growth levels will change or be impacted in the future.

The objectives for forest vegetation have no basis. What is disturbing is the claim that various vegetation projects (2-8, including from 600-800 acres) will be done to benefit wildlife. The RFP and DEIS do not provide any science indicating that vegetation projects are needed for any wildlife species, so the rationale for these objectives is unknown. This is a significant violation of the NEPA in that the agency is claiming that many acres of the forest need intervention for wildlife, without providing any supporting documentation in the draft EIS.

The guidelines for vegetation management indicate that logging is needed to restore old growth, which is implausible since logging will destroy old growth characteristics needed by wildlife. The guidelines also claim that logging of old growth is needed to prevent insects and disease, when in fact these are important features of old growth. Finally, science has demonstrated that natural, dense stands of older forest habitat are more resistant to fire than logged stands, where the understory dries out earlier in the summer, and wind speeds will be much higher. Logging of old growth is clearly being misrepresented as a need to save old growth when in fact it will destroy/degrade it. Once again, this false assessment is a violation of the NEPA.

This section also repeats the extremely outdated snag management direction, which is to have 4 snags per acre "somewhere" in the area of a project. Since this is not a standard, there is actually no requirement to provide snags in harvest units, including clearcuts. Live trees can be substituted for snags. So in effect, there is no specific level of snags required, so it is impossible for this direction to serve as a "proxy" for associated species. The DEIS does not actually define how this proxy ensures a diversity of species associated with snags.

11. Wildlife

As noted previously, the term RNV has no meaning for wildlife. The claim that maintaining the RNV will maintain a diversity of wildlife certainly needs documentation. And this could apparently include a wide range of vegetation conditions, none of which has been identified in the draft RFP or DEIS. The science for historical ranges of old growth are from 20-50%, and for forest stands over 100 years in age, range from 36-71%, depending upon the fire cycles in various vegetation types. So if the agency was really going to maintain the RNV, then the forest would have large significant tracts of real old growth and older forest habitats. There is nothing like this that will be provided in the RFP. So the claims that RNV is guiding the massive interventions proposed in the RFP are false.

The objectives for wildlife at the draft RFP at 57 state that there will be from 1-12 projects per year, depending on the alternative, to "restore" or "improve" wildlife habitat. There are no examples of what constitutes restoration or improvement of wildlife habitat. There are no indications, as well, as to how problems with wildlife have been identified so that these can be fixed. It is a long standing practice by the agency to claim that wildlife habitat needs to be improved so that logging and burning programs can move forward. Forest Plan direction needs to be based on science. Proposing to implement many projects to improve wildlife habitat without providing the public with any supporting information is a violation of both the NEPA and the NFMA.

The guideline for habitat connectivity lacks any criteria as to what constitutes a barrier to wildlife movement. In many cases, habitats create impediments to travel, not barriers, which means there are still adverse impacts. There needs to be some specific criteria as to what creates adverse

impacts to connectivity, and what limits are going to be imposed in the draft RFP.

The standard claim that raptor nests will be avoided ONLY during the nesting season, means that these important nest areas will not actually be maintained. This should be disclosed in the draft EIS as the possible eventual elimination of raptor nesting in order that vegetation treatments can be completed. Also, since surveys are not required, this claim that nests will be avoided during the nesting season is just window dressing, since it is highly unlikely that any nests will ever be located prior to vegetation treatment projects. What is the probability that any and all raptor nests will be located during projects?

For bats at draft RFP 59, we have the same issue. Claims are made that mitigation for bats in vegetation treatment projects will include protection of hibernacula and roosting sites, including maternal roosts. Yet there are no requirements (standards) that bats will be surveyed for in proposed project areas where logging will occur. This mitigation measure is a violation of the NEPA because it is unlikely to ever ensure protection of bat habitat, including for the threatened Northern Long-legged Myotis.

For big game (draft RFP at 59), there will be no management for habitat effectiveness, security, or winter ranges. There is not a single standard to manage big game habitat. The DEIS did not identify how habitat for this large suite of species can be maintained as a result. The ongoing problem of elk displacement to private lands in the hunting season will clearly not be addressed by the draft RFP, so what is the purpose of this plan, if it does not address major ongoing problems? The DEIS did not define why this problem will not be addressed in forest management. The DEIS did not show that this problem will continue to get worse with the proposed management of the draft RFP. This is a NEPA violation for failure to disclose likely impacts of the draft RFP.

The draft RFP indicates that big game security does not require hiding cover. Of course roads have a huge impact on security, but clearcuts do not hold elk during the hunting season even if there are no active motorized routes within half a mile of the clearcut. Failure to use the correct definition of habitat security is a NEPA violation. There is no published science that reports that hiding cover does not influence elk fall habitat use.

The draft RFP claims that big game winter range will be improved by habitat projects. We are not aware of any published science that has reported that management of big game winter ranges has increased big game populations. The science indicates that energy conservation in the winter is the most important survival strategy for big game in the winter, yet there are no standards for hiding and thermal cover on big game winter ranges. Without any standards, how can "improvement projects" be designed?

The draft RFP at 59 states that a goal will be to development management strategies and monitoring approaches for big game management. There is plenty of science available for big game security, habitat effectiveness, and management of winter ranges to develop management approaches. This is just an excuse for the agency to violate the requirements for forest planning by claiming that planning for big game habitat will be done at some future date. This is a violation of the NFMA.

For big horn sheep, the goal is to reduce the risk of disease. The problem of disease transmission from domestic sheep to big horns is well established. However, there is nothing in the draft RFP that will ensure active protection of big horns from this problem. The DEIS does not identify that big horn sheep populations will continue to be threatened due to this lack of proactive management.

For bison no proactive strategies were identified to promote this species on forest lands. It appears to be a given that livestock will take priority over bison, although it is not clear why. One curious factor in this section is the suggestion that habitat improvement projects may be implemented for bison. What these may entail was never identified, so the pubic has no idea as to what habitat improvement for bison is. Habitat improvement would certainly include expansion of bison range onto forest lands.

The management of lynx will be based on the Northern Rockies Lynx Management Direction (NRLMD), which was incorporated into various forest plans, including on the Custer Gallatin National Forest. The problems with the NRLMD include its extremely outdated nature, with many new science publications on lynx habitat that define habitat needs of this species much different than the NRLMD. And the monitoring for the NRLMD is a violation of the NEPA, the NFMA and the ESA, since the acres allowed for habitat exceptions is the proxy for lynx population trends. There was never any analysis provided to demonstrate that lynx populations will remain

stable or increase as long as the exception acres are not exceeded. This proxy for monitoring lynx populations is clearly invalid, which makes the NRLMD invalid as well. Overall, there is no doubt that the NRLMD jeopardizes the conservation and recovery of the lynx, and continued implementation of this management direction is a violation of the ESA. To date, we have no seen any efforts by the agency to identify ongoing population trends for lynx on the forest even as the NRLMD has been implemented now for 10 years. The public needs assurances that it is working, including in the draft RFP where continued use of the NRLMD is being proposed.

For sage grouse, there are no standards required for their habitat management. The forest plan amendments for sage grouse management on national forest lands in Montana allow continued degradation of sage grouse habitat, including burning of sagebrush to create a "diversity of sagebrush age classes" (this is defined as a variety of sagebrush communities). To date, there is no science that demonstrates that fragmentation of sage grouse habitat with burning benefits this species, so why is this allowed in the draft RFP? This is just continued use of sagebrush burning to increase forage for livestock. As a monitoring requirement, the ongoing population trends of sage grouse on the forest need to be provided yearly to the public, so the public can understand if claimed conservation measures are working for this species.

One of the rationales used to save the sage grouse is burning of sagebrush/juniper habitats. The literature on the benefits of juniper removal, however, do not include burning of sagebrush, only removal of juniper trees. Juniper and small conifers are being used as an agency excuse to continue the long-standing practice of burning sagebrush. In addition, the removal of juniper trees is done where there has been demonstrated lack of "open space" nesting habitat for sage grouse. The benefits of juniper removal for sage grouse have to be weighed against the high importance of juniper to many other species, including mule deer and big game winter ranges. There is nothing in the draft RFP that identifies the high value of juniper to wildlife, or the long burning rotations in juniper of up to and over 400 years. There were no focal species identified for juniper. So this important tree species will be targeted for removal without any indicator (focal) species being monitored to determine population impacts, which is a violation of the NFMA and NEPA.

Two serious impacts of livestock grazing management on sage grouse will not be addressed in the RFP and associated amendments for sage grouse. These include the relentless increase in water developments, which bring in a key predator on sage grouse nests and nestlings, or ravens. Also, the impact of endless miles of fences on sage grouse will never bee addressed, including where additional fencing is planned. It is clear that the draft RFP has severe deficiencies for sage grouse management. Yet the DEIS does not indicate that sage grouse populations are likely to continue their declines due to the failure of the RFP to protect habitat.

The management proposal for grizzly bears is a violation of the ESA, as the conservation strategy designed in 2003 is to be implemented. This does not use the current best science for grizzly bear management. For example, many of the habitat protection measures are based on the 1998 base levels of security. Since that time, the grizzly bear population has expanded its range by 40%, without any population increases for the last 17 years, with possible declines since 2007, or the last 10 years. Security based on 1998 levels is no longer valid. In addition, there is strong science that indicates that not only security, but the road densities outside security, as mutually important to grizzly bears, since they must travel through roaded areas between security areas. The failure of the conservation strategy to manage open and total road densities outside of security area means that there will be unlimited take of grizzly bears over the period of the plan.

Another significant factor that makes 1998 baseline management targets is the huge change and decline in grizzly bear food resources in the Yellowstone Ecosystem. This is clearly the reason why the population has expanded its range by 40% without any actual population increases. Security areas will have to be larger to accommodate these changes in density. In addition, the areas required for security are not based on any existing science. The recommended size of security areas in the Yellowstone Ecosystem is thousands of acres, or even larger than what is recommended in the Northern Continental Divide Ecosystem.

There is abundant science that open roads create significant mortality and avoidance impacts on grizzly bears. As well, closed roads increase mortality risk to bears due to hunters. In addition, the conservation strategy does not require actual mitigation of new roads, since closing the road, or decommissioning, is all that is required. Management of grizzly bears

with trees, so that it does not look like a road to some grizzly bears.The conservation strategy and thus the draft RFP allow unlimited miles of roads outside of grizzly bear security, which does not address conservation needs of this threatened species.

The section on livestock use in grizzly bear habitat lacks any actual conservation value to the grizzly bear as it will allow removal of bears that get into conflicts (eat) livestock. In recent years, the expansion of grizzly bears out from the core of the Yellowstone ecosystem is resulting in a huge increase in the use of livestock by bears as a replacement for loss of other foods. If bears are going to be removed due to conflicts with livestock on public lands, then this needs to be identified as a population drain and taking permits are required.

The standards for security allow loss and degradation with logging projects and roads. It is unlikely that roads will revegetate with trees once the area is claimed to be security again. Over time, security areas will be fragmented with any number of "decommissioned roads" which reduce security. Also, replacement of security areas if one if used for projects does not have to ensure equality, especially as per elevation and all seasonal needs of bears. Good bear habitat could easily be replaced withy marginal or poor habitat. This replacement strategy also does not address the pattern of home range use of female bears. It should not be assumed that bears can easily switch to new habitats if they are not experienced in using these other areas.

It is not clear how roads can be built in the winter when projects are planned in security areas. It is also not clear why snowmobile use is assumed to have no adverse impacts on grizzly bears, including in the shoulder seasons of hibernation, as well as during hibernation. Does the science exist for this management strategy? Also, what science is available to indicate that winter logging in security areas will not impact grizzly bears. Will the science and surveys be available so that den sites are known?

Prairie dogs at page 69 implies control is ongoing, but there is no specific information as to when control will be implemented, including lethal control. How is prairie dog control related to livestock grazing on public lands? If control is being done on adjacent private lands, are these same private folks allowed to graze on public lands? There are so many wildlife species that benefit from prairie dogs that much more management

information is required for this section, including intensive surveys for species at risk in areas where lethal control is being considered.

The section on wolverine at 70 is the standard inference that this proposed species only requires habitat above timberline, so amazingly, there is no need to manage forest habitats for this species. The failure of the draft RFP to identify key habitats for this species, including big game winter range, forest habitats with suitable prey as snowshoe hares, and the avoidance of developed landscapes, including harvest areas and roads, shows the agency's complete lack of commitment to ensure this species is conserved on public lands.

It is unclear in the draft RFP is the species discussed in the wildlife section are to be "focal species." These species are never specifically identified anywhere in the draft RFP. Why is this? It is a requirement of the planning regs, so this information needs to be in the RFP. These focal species are similar to the previous function of management indicator species, to demonstrate how management impacts are affecting wildlife. We specifically request that there be focal species for the following habitats, including species that can be inventoried relatively easily, including:

Old growth forests per timber compartment so that it is well distributed and can actually be measured (e.g., brown creeper, goshawk, pine marten, great gray owl, pileated woodpecker, Canada lynx, northern flying squirrel, moose).

Large blocks of dense, undisturbed older forest with abundant snags per timber compartment (woodpecker management areas) (e.g., three-toed woodpecker, red squirrel, crossbills, mountain chickadee, pine grosbeak, red-breasted nuthatch, Hammond's flycatcher, golden-crowned kinglet, winter wren, varied thrush, hermit thrush, gray jay, ruby-crowned kinglet, solitary vireo, and Stellar's jay).

Ecotone areas with sagebrush, juniper, Douglas-fir and limber pine (e.g., Loggerhead shrike, pinyon jay, Cassin's finch, jackrabbits, merlin, lark sparrow, flammulated owl, goshawk, cottontail rabbits, and mule deer.

Security habitat during the hunting season per hunting district: elk (population trends, bull age structure, bull/cow ratio).

Aspen habitats per watershed (utilization levels and age structure to demonstrate regeneration); good regeneration indicated by yellow warbler.

Sagebrush habitats: (i.e., Brewer's sparrow, sage thrasher, white-crowned sparrow, Loggerhead shrike, black-tailed jackrabbit).

Unroaded habitats at least by timber compartment, defined as areas where any old roads have completely grown in with trees so that they no longer fragment the landscape, (wolverine, grizzly bear).

Ungrazed reserves well distributed within watersheds across the forest for wildlife species that are intolerant of grazing: (e.g., sage grouse, meadow vole).

Riparian areas free of livestock grazing but not fenced with barbed wire that creates huge hazards to wildlife, both game and nongame species.

There is a simple way to manage for these different species and their habitats, which we would like to recommend as one alternative. This is that 50% of each watershed or timber compartment be managed in its natural condition, with no vegetation treatments, roads, fuels management, and some percentage of willow/aspen areas and grasslands that are free from livestock grazing as well as free from barbed wire fences. Areas in adjacent compartments and/or watersheds could be combined Over time, grazing allotments could be retired to develop the ungrazed reserves, including riparian/aspen areas. This is the only way that the agency can actually manage for wildlife and public recreation in order to provide the vast areas required of natural forests processes for all wildlife species, from nongame to game species. This strategy would also address climate change, since dense forests take up the most carbon, while logging creates huge releases of carbon. Dense forests also are less likely to burn. However, in these wildlife management areas, fires would be left to burn, with no salvage allowed.

12. Livestock Management

The draft RFP notes at page 75 that "vegetation treatments" will occur on livestock allotments. Of course this is burning sagebrush and juniper. The draft RFP needs to provide some amount of explanation to the public as to why livestock management is going to have priority over wildlife on grazing allotments, which is the purpose of vegetation treatments. As per our ideas above on providing habitat diversity for wildlife intolerant of grazing, a target in the RFP should be progressive development of these areas by closing out allotments when the opportunities arise. This would also be beneficial for species impacted by endless fences and water developments, including sage grouse and numerous forest and grassland birds that drown in

water tanks and are killed by fences. Currently, there is no strategy in the RFP to address these long-standing problems. Areas free from grazing would also address the ongoing problem of cowbird parasitism on various bird species. There is no mention of this resource issue in the draft RFP.

In regards to the AUMs, how can these numbers be predicted without any analysis of wildlife needs, from sage grouse to other species harmed by grazing, including small mammals (species that feed most wildlife predators) that are relatively intolerant to grazing. The RFP is supposed to address problems in resource management, not set permanent grazing levels that make addressing wildlife issues over the coming planning period impossible.

The grazing section of the draft RFP did not address a serious ecological crisis, which is the inability of aspen stands to regenerate due to livestock use. There is no information provided on this problem, and no solutions developed. There should be an inventory of aspen stands across the forest so that the impact of livestock damage can be clearly noted. There is the same problem with willow species in riparian areas. The loss of wildlife carrying capacity due to damage in riparian areas needs to be identified, since this is an ongoing resource problem. There needs to be utilization limits established for willow species in riparian areas, as well as target densities of riparian songbirds.

13. Timber Management

It is quite amazing that there are basically no standards for hundreds of species of wildlife on the forest, yet there are many standards for timber (at least 11). The draft RFP is extremely unprofessional in this section, as it is suggested that even without a single habitat standard for forest wildlife, that timber harvest can sustain ecosystems and contribute to ecosystem health. Apparently wildlife is not included in "forest health." The agency should simply say that the purpose of the RFP is to manage the forests as a tree farm, and wildlife will have to survive in spite of no habitat standards.

There is no tie to wildlife for the objectives for logging, including from 6-15 million board feet per year, and logging from 5,000 to 8000 acres per year. Where is the analysis that demonstrates that wildlife can persist with these levels of logging? This is a violation of the NFMA, because forest plan direction should be based on science.

The standard on opening size of clearcuts is very misleading to the public, and can not actually be called a standard as it does not limit the size of openings. Table 17 identifies a "new" maximum size of openings which includes openings up to 80 acres. It is not clear how this is consistent with the NFMA on clearcutti8ng size limitations. What is clearly misleading, and a violation of the NEPA, is the footnote for this table that claims that clearcuts can be over 40 acres because fires can burn more than 40 acres at a time. Where is the data that demonstrates that clearcuts are the same as burned areas, including for wildlife? Actually, crown fires can be thousands of acres in a block, so why isn't the clearcut size allowed up to thousands of acres. Where did the 80 acres come from?

We have a strong objection to the claim that pine beetles create natural openings, and as a result, there would be no limit to the opening size. Where is the data that pine beetle areas are the same as clearcuts? We note that in the 2013 elk management guidelines (USDA MFWP 2013), it is claimed that dead trees in pine beetle areas provide cover for big game. The claim that burned and beetle-killed forests have the same wildlife values as clearcuts is a violation of the NEPA, as the agency is required to provide high quality information to the public.

The 60 day public review requirement for openings that exceed 40 acres is nothing more than a standard procedure that allows any size of clearcuts. This 60 day review is never even actually a review, just a process that approves any size of clearcut openings.

The standards for timber include harvest of unsuitable timber. This requires that there will be a wildlife benefit. The draft RFP did not cite any examples of where logging will benefit wildlife. Why was this harvest of unsuitable lands included as a proposed action if there is no verification anywhere, including in the DEIS, that wildlife will benefit? For example, fuels management is identified as a reason to log unsuitable lands. However, there is no science that we know of that has currently defined fuels management as wildlife habitat improvement. It is unclear what the draft RFP direction is based on.

The guideline on salvage harvest means that a few mitigation measures for wildlife is all that is needed, even though burned forests have a high value to wildlife. Why will a few clumps of burned trees maintain habitat birds

associated with burned forests, such as the sensitive black-backed woodpecker. Why wouldn't a certain percentage of burned forest areas that provide suitable black-backed woodpecker habitat be a standard?

14. Road and Trails

The section of road management is completely devoid of mitigation measures for wildlife. Apparently the agency has science to indicate roads do not impact wildlife, so no road standards for wildlife are needed. However, management of big game, wolverine and grizzly bears, for example, are strongly tied to open and total roads. How can the draft RFP provide management direction without any standards of road densities for wildlife/

There also needs to be a recognition in the section on roads and trails that closed roads still impact wildlife, including by creating access for hunters. There needs to be some limit on the density of nonmotorized trails for wildlife, something that is not included in the draft RFP.

15. Inventoried Roadless Areas

We could not find a reasonable map displaying these IRAs on the Forest. Why is the public expected to go find some other map to know where these areas are? The RFP clearly needs to provide large-scale, good quality maps of all IRAs on the Forest. We have a concern that the draft RFP claims that restoration activities are allowed in IRAs. As before, there is no information provided on what type of restoration activities may occur, and how it was determined at this time that restoration will be needed. As we have noted many times previously, the agency needs to provide a scientific basis for proposed actions in the RFP. What information is currently being used to determine that restoration is needed in IRAs?

16. Recommnended Wilderness Areas.

Of course Alternative D is the preferred action for wildlife. It is unclear what the basis is for Alternatives B and C for eliminating the majority of recommended wilderness areas. What was the basis for these different alternatives in regards to wildlife. There will be a huge difference for wildlife between these alternatives that should be at least briefly identified in the RFP in tabular form. One example are levels of human disturbance. And

another example is the degradation of wildlife habitat due to fuels management and logging. There needs to be some type of analysis as to how more development of these currently undisturbed areas will impact wildlife, and how these adverse impacts affect cumulative impacts on wildlife across the forest due to management activities outside of protected areas. The basis for these different alternatives is never identified, especially the huge difference in areas that would be retained as wilderness between alternatives. What is the wildlife strategy for these various alternatives, including why they are so different?

There needs to be a map in the FEIS showing all the recommended wilderness areas in Table 28 at page 129.

Alternative B is a violation of the requirements to manage these recommended wilderness areas as nonmotorized.

The plan to do restoration activities in recommended wilderness is never supported with any information as to why specifically restoration is needed to maintain ecological features of these areas, including wildlife. As we have noted many times before, this is putting the cart before the horse. Without any actual data to indicate there are problems in recommended wilderness areas, how can the agency determine that intervention is needed?

17. Backcountry Areas

The RFP needs to include good high quality maps in an appendix for the backcountry areas identified in Table 29 at 132.

18. Proposed Geographic Areas

The 1986-87 forest plans for the Gallatin and Custer National Forests provided far better designation of geographic areas, identified as Management Areas, that what is being proposed for the RFP. These areas are extremely large, and prohibit any meaningful information being provided to the public on wildlife habitat conditions. The agency needs to include reasonably-sized landscapes where wildlife habitat conditions will be identified and monitored over time, such as timber compartments and/or watersheds. The large 6 areas being proposed makes measurement of wildlife habitat conditions impossible during the upcoming planning period, which defeats the purpose of having a forest plan. If the public cannot see

how public lands are going to be managed in the forest plan, then this plan is a violation of the NFMA.

The visions for these 6 geographic areas are based on rhetoric that is meaningless to the public, including "resilient ecosystems." What are these, and why aren't ecosystems currently resilient?

The maps displaying plan allocations for designated areas are not being provided to the public in hard copy. They are supposed to print these out at their own expense. This process makes it very difficult for the public to see where these areas are being delineated. Such maps are key to public information, and need to be provided as good quality available information to the public for their input.

There are many areas in the 6 geographic areas that are not included in any designated areas. So these areas do not have any specific management identification in the forest plan. How is the public supposed to understand how these large landscapes are going to be managed? There are many projects and expansive logging and fuels reduction projects and programs planned across the forests, the public should know where these actions are planned. This is important for an "overview" of the proposed actions, instead of just letting the public guess where these may occur.

19. Wilderness Study Areas

These areas need to be mapped in an appendix in the RFP so that the public can understand where they are, and how they will be treated in the planning process. We note that "restoration" activities will be allowed in these WSA, although it is unclear what these activities entail, where they may be planned, and the science and monitoring used to determine that current conditions are unnatural. The acreage that is expected to be "restored" also needs to be identified per alternative. These acreages also need to be mapped, since there is apparently information available to identify currently unnatural areas in these WSAs. It is noted that restoration activities may include motorized equipment, a use that is counter to the purpose of WSAs.

20 Monitoring

We could not find a listing of what the "focal species" are for monitoring resource management activities in the upcoming planning period. Where is this important information provided? The draft RFP at 190 notes that the required 2012 planning rule requires monitoring of the status of focal species to assess the ecological conditions required under 36 CFR 219.9. Monitoring also needs to address species of conservation concern. It should be noted that old growth forests are a key characteristic of terrestrial ecosystems, that would require monitoring.

In Table 69, there is a notation at page 195 that land bird species assemblages associated with forested vegetation are an indicator for forested vegetation. However, the species this includes, or how they will be monitored, is never defined. This section also indicates that old growth forests will be monitored on a forest-wide basis and by potential vegetation type. This will be a meaningless monitoring effort, as old growth habitat within local watersheds is what is important to wildlife, like the pine marten, brown creeper, goshawk and moose. Forest-wide levels of old growth will have no meaning as per population levels of these and many other associated with old growth. This monitoring item is a violation of the NFMA because it will not generate any meaningful information. The same problem exists for land bird monitoring. Apparently the agency is just going to use regional population monitoring for various land birds, which will not provide any information to forest-specific habitat impacts for all these species.

The monitoring program includes the acres/number of habitat improvement projects completed for wildlife. However, it is unclear as to how this is a proxy for wildlife habitat diversity. And as noted previously, there is no actual data and science ever provided, including in the DEIS. to indicate that wildlife populations can be increased with management actions. These number of projects is not an indicator of population levels of wildlife, and is an invalid monitoring method as per the NFMA.

A similar monitoring item includes the numbers/acres of projects that reduce conifer encroachment in ecotones. Again, there is no actual proxy that ties acres of conifer removal to wildlife populations. All this monitoring item does is measure achievement for projects identified in the RFP. This again is an invalid monitoring approach to measure vegetation treatment impacts on wildlife in ecotones. It is likely that all such projects reduce wildlife

populations. Yet these impacts will not be measured, in violation of the NFMA. The purpose of monitoring is to measure real impacts, not measure acres treated. The land bird assemblages that are focal species for the removal of conifers in ecotones is never identified, so the public does not know what species are supposed to increase with conifer removal.

The monitoring of fuel treatments results in the same failure of this monitoring program to meet the requirements of the NFMA – that valid proxies are provided if wildlife impacts are to be measured by habitat rather than populations themselves. Fuel treatments will create severe impacts to most wildlife species, especially for those dependent upon understory forest conditions that are extensively removed in fuels treatment projects. One example is the snowshoe hare, a key prey species for many other forest species. This species is highly dependent upon the understory vegetation that will be removed in fuels projects. Simply measuring the acres of fuels treatment projects will not provide a proxy for wildlife populations, although acres treated can be generally expected to reduce wildlife populations in treated areas.

What is missing from the monitoring of fuels treatments is any information on effectiveness of these in controlling the spread of wild fire. In many cases, forest thinning will increase wind speeds, as well as increase mid-summer drying of vegetation. In addition, thinning will result in return no understory vegetation within several decades. The long-term effectiveness of these treatments needs to be monitored so that management into the next planning period can be improved.

For wildlife, the monitoring requirements include measurement of projects and acres that result in improvement of wildlife habitat. Since there is no requirement that habitat improvement projects really improve habitat for wildlife, or increase populations, or restore unnatural, degraded habitat conditions for wildlife, again this monitoring item has no actual value for project impacts on wildlife. Also, monitoring of the various vegetation treatments planned in the RFP in both forested and nonforested habitats have no value in indicating population and habitat levels for wildlife. So again, the "proxy" for wildlife habitat and populations is invalid, and a violation of the NFMA.

The monitoring information indicates that detection of fungus in bats will be implemented, but there are no standards in the RFP that this will be done.

There are actually no survey requirements for any bat species in the RFP. So this monitoring item is most likely never going to be implemented.

For big game, the acres of vegetation treatments is supposed to be a proxy for big game populations, although it is not clear what this is based on. The known habitat conditions that impact big game, including security, habitat effectiveness, thermal and hiding cover, are not included in any monitoring. So there will not actually be any monitoring for big game habitat levels. The only monitoring item will be big game populations levels at the region level. It is unclear why this would not be done at the forest level, since this is where habitat management impacts would be demonstrated.

For lynx, the monitoring item, or acres of exceptions used, is another invalid proxy for lynx population trends. The assumption that lynx populations will not decline until the exception acreage limit is exceeded is never supported with any science. The current best science has provided well defined habitat criteria needed by lynx, and this needs to be used for monitoring the impacts of management actions. In this respect, fuels reduction activities that involve the removal of forest understories will have severe impacts on lynx by removing habitat for their key prey species. These acres in lynx habitat need to be monitored as an adverse impact on lynx in occupied habitat. The increase in unsuitable habitat will clearly impact lynx, but the limits allowed in the NRLMD are much higher than occurs in actual habitat areas used by female lynx that successfully reproduce. This monitoring item needs to be reduced to the normal level of unsuitable habitat that occurs in female lynx home ranges, since this would be an indicator of the level of adverse impacts in general that are occurring in lynx habitat.

For greater sage grouse, the number of occupied leks does not tell the whole story about population trend, since attendance could decline drastically while a lek still continues to be used. Population level at leks is also an important monitoring item. The second monitoring item in this section cannot actually be understood. The number of acres that change in general and priority habitat is in itself meaningless, unless these changes are a measure of degraded habitat conditions, such as burning sagebrush. More information about this monitoring item needs to be provided.

For grizzly bears, although the proportion of open and total roads is being monitored by the Interagency Grizzly Bear Study Team, there are no

standards in the RFP that are used as indicators of degraded habitat conditions. Without any actual standards, there will be no triggers that require actions to correct problems. So it is not clear that this is a valid monitoring element. It is also not clear that measures of open roads includes those used for project activities. If this measure does not include all active motorized routes, then this is an invalid measure for grizzly bear habitat. Disturbances also need to be measured for motorized activity levels on roads, and acres that will have logging activity and post-sale treatment acres. The impact of logging itself is almost always ignored, but it is not clear why logging activity does not displace grizzly bears.

For bear management outside the recovery area, as we noted previously, the breakdown of habitat within and outside the primary conservation area is invalid due to significant changes in both grizzly bear habitat and grizzly bear numbers since the conservation strategy was developed in 2003. Assumptions made in 2003 are no longer valid in 2019. Even though security habitat will be monitored outside the PCA, but within the demographic monitoring area, there are no actual standards for maintaining any level of this security. So there are no actual triggers that would require new management actions for this secure habitat, which means that the monitoring requirement is meaningless.\

Finally, as we noted previously, there is no requirement for measures of open and total road density outside of security areas in either the PCA or demographic monitoring area. This means that one of the most important factors affecting grizzly bear mortality and displacement is not going to be monitored. This means that the monitoring program will not be valid for measuring management impacts on grizzly bears, since the RFP indicates that management actions are planned to be extensive across the forests, including in wilderness study area and inventoried roadless areas.

For the wolverine, monitoring persistent snow cover has nothing to do with vegetation treatments that are planned across the forests during the next planning period. The impact of these actions, including in forested area that provide important prey for wolverine, for management of big game winter ranges that are key to winter survival for wolverines, and the impact of landscape development that displaces wolverine, such as timber harvest units and roads, is not being monitored for this species. This monitoring strategy therefore has no potential to indicate the impact of management activities on this species, in violation of the NFMA.

21. Draft Environmental Impact Statement

To our surprise, this DEIS does not include any analysis of vegetation treatments on old growth species, as the pine marten, goshawk, pileated woodpecker, or moose, or a variety of forest songbirds associated with old growth. It certainly cannot be claimed that the expansive acreage of various treatments will not impact old growth or old growth-associated species. The claim that a few trees is old growth was never substantiated in the DEIS, showing that forest thinning will not reduce populations and suitable for associated species. This is a severe flaw for the RFP, a complete failure to develop an old growth strategy. The DEIS did not explain why old growth management is not required as per the current best science.

As well, there is no snag management strategy based on current science in the RFP, and no analysis in the DEIS that a huge swath of wildlife will be adversely impacted by the failure of the RFP to maintain their habitat. The snag management strategy identified in the draft RFP is not even close to a valid conservation strategy, a problem that is was noted in the DEIS. It is clear that the DEIS was developed simply to promote the RFP, instead of to identify how the plan will impact various wildlife species.

The impact of treatment of ecotones was not even minimally addressed in the DEIS, as was the impact of management on big game displacement from public lands, the impact on big game population structure due to severe limitations on security, or the impact of vegetation treatments on big game winter range.

Overall, the DEIS for the draft RFP provides almost no valid information for the massive vegetation treatments that are planned, all of which will adversely impact some wildlife species.

We looked for a description of the focal species, but apparently these are just the species evaluated in the DEIS. It is not clear how these species represent all wildlife populations and habitats on the forest. This seems to be a huge problem that the agency never solved. What are the focal species for old growth habitat, older undisturbed tracts of forest habitat with high densities of snags, the very limited ecotone habitats, aspen habitats, riparian habitats, and juniper/limber pine habitats, for example? All of these habitats are key habitats on the forest that require special management. There is no management scheme for any of them, which is a violation of the NFMA.

22. Conclusions

This draft RFP has almost no protection and management for wildlife. It is nothing more than a logging program for the timber industry, and a jobs program for the forest service, especially fuels management and "habitat improvement projects" that are never defined. Also, this draft RFP is extremely complex in regards to vegetation objectives, the source of which is a complete mystery to NEC and AWR. It is actually the perfect design to thwart any public involvement, because the public will have no idea what is actually going on, including within the 6 geographic regions. This makes the draft RFP a violation of both the NFMA and the NEPA, as it prevents any reasonable level of public understanding or involvement of management actions.

It is rather surprising that almost the entire forest is unnatural, and requires massive intervention with logging and burning in order to be a healthy, functioning ecosystem. This claim in itself is a violation of the NFMA as well as the NEPA, because the agency is using invalid, unsubstantiated rhetoric in order to advance your own agenda. We note that the range of natural variation is never actually defined, including for old growth forests. And "resilience" is also an agency term used to justify management actions. The public is expected to believe that it is a miracle that the forests and their wildlife somehow managed to survive since the last 10,000 years from the ice age without logging and prescribed burning.

At this time, NEC and AWR would like to propose a very simply alternative that would be easy to tract and for the public to be involved:

Exactly one-half of each watershed across the forest should be managed only for wildlife, with no vegetation treatments or roads allowed for any reason (no exceptions). The other half can be where the agency implements management activities. These management areas would be mapped across the forest and readily provided to the public so they could actually monitor agency compliance. This strategy would ensure that wildlife habitat needs will be met in each watershed and thus distributed and maintained across the forests. This strategy is likely what is actually needed in order to ensure persistence of almost all forest species. For grasslands, the habitats in these wildlife watersheds would be targeted for removal of livestock when options become available. This would ensure that habitat for

species intolerant of grazing, and the long list of adverse impacts to wildlife from livestock allotments, including degraded riparian areas, unmeasured mortality impacts of fence strikes and drowning in water tanks, the displacement of wildlife by aversion to cows, the increase in ravens due to water developments and livestock carcasses, and the lack of nesting cover for sage grouse would be addressed in a meaningful manner in agency management.

Please add this alternative to another draft of the RFP, when the many deficiencies are corrected for a new version that meets the requirement of the NFMA, including monitoring requirements for focal species. Please identify what the focal species are and what key habitats they represent, and what habitat criteria they need for persistence.

`Regards,

Sara Johnson, Director
Native Ecosystems Council
PO Box 125
Willow Creek, MT 59760

Mike Garrity, Director
Alliance for the Wild Rockies
PO Box 505
Helena, MT 59624