

The Summit Lighthouse and Church Universal and Triumphant

Legal and Corporate Affairs

September 8, 2020

Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130 (10 E Babcock)
Bozeman, MT 59771

RE: Objection to Draft Revised Forest Plan Custer Gallatin National Forest #50185

Dear Forest Plan Revision Team:

This is to submit an objection based on unresolved or unaddressed concerns stated in our public comments (enclosed), including but not limited to potential impacts to our adjoining lands and rights from Recommended Wilderness Area (RWA) designation (p. 123) of public lands to the immediate south of our Royal Teton Ranch.

Our enclosed public comments include:

- March 5, 2018 comment letter from Valerie McBride, President
- June 5, 2019 comment letter from Valerie McBride, President
- June 6, 2019 comments submitted by Alan Shaw, Business Manager, letter id 50185-2788-8640

I will be serving as the lead objector.

Sincerely,



Gregory Bodwell
General Counsel

/gb
Enclosures

The Summit Lighthouse and Church Universal and Triumphant

OFFICE OF THE PRESIDENT

March 5, 2018

Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130 (10 E Babcock)
Bozeman, MT 59771

RE: Comment on Custer Gallatin Forest Plan Revision

Dear Forest Plan Revision Team:

Thank you for the opportunity to comment on the Custer Gallatin Forest Plan Revision.

Our organization appreciates our long history of mutual support and cooperation with the Forest Service, including our conservation easements assigned to the Forest Service for public benefit. We deeply value the unspoiled quality of this region by the Yellowstone River in which we have been blessed for over thirty years to manage our operations, steward the land, and contribute back to the community. We contribute energetically to maintenance of the ecosystem, including most recently through our fuels reduction and insect mitigation programs in our forests. We desire to see this area retain its natural beauty for continued public enjoyment of the varied recreational opportunities we offer, directly or through licensed providers, including trail rides, hiking, camping, responsible hunting, vacation rental homes, geothermal waters, and our quarterly conferences.

Continued enjoyment by the public of this most special place requires a balanced partnership between dedicated institutions and agencies fostering conservation and the private landowners like ourselves who play a key role in making the benefits of the land practical and available to people through services we offer.

We are concerned that designations such as Wild and Scenic Rivers and Wilderness not create harmful restrictions on management of lands that might interfere with these offerings. We join other concerned voices in requesting, at minimum, a reasonable buffer between any wilderness designated area and neighboring private lands, and due consideration and respect for private property rights, as these serve a necessary role in allowing community benefits to flourish.

We are always open to dialogue with the Forest Service on matters of mutual interest.

Thanks again for the opportunity.

Sincerely,



Valerie McBride
President

:gb

The Summit Lighthouse and Church Universal and Triumphant

OFFICE OF THE PRESIDENT

June 5, 2019

Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130 (10 E Babcock)
Bozeman, MT 59771

RE: Comment on Draft Revised Forest Plan Custer Gallatin National Forest

Dear Forest Plan Revision Team:

This is to add to our comment submitted in the previous comment period.

Regarding Wild and Scenic Rivers (WSR) eligibility for the Yellowstone River, the Draft EIS states "*As this river eligibility study does not apply to privately owned lands, there are no direct effects on those lands.*" Indirect impacts to privately owned lands, however, promise to be significant, including through local zoning as encouraged under WSR to further its purposes. We believe a Suitability Study is needed as a part of this Forest Plan, which may well result in a finding that the Yellowstone River is not suitable for WSR designation:

1. The geographic narrowness of the Gardiner Basin heightens the impact of the initial WSR ¼-mile river boundary, encompassing nearly all existing occupied and developable lands north of Gardiner.
2. WSR designation has the potential to inhibit the recreational, tourism and other economic activities of Park County and the State of Montana by limiting future growth of the Gardiner Basin—services needed to support public enjoyment of the land. It may have the effect of moving development growth north of Yankee Jim Canyon. Although it's argued that WSR designation may help the economy by fostering the attraction of a unique and special place, this area along the Yellowstone River we must agree is already such an attraction. We need to support and not restrict the small businesses and vendors that make visiting this area possible and the pleasure that it is.
3. WSR designation will likely impact the ability of the Gardiner Basin to support visitors of YNP.
4. One of the primary goals of the WSR Act is to maintain a free-flowing river. The Yellowstone River is free-flowing and not likely ever to be dammed. It would be prohibitively expensive relative to the benefits. There are no water resource projects active or likely in the future on this stretch of river.
5. U.S. Hwy. 89 is the only road access to Gardiner and the YNP North Entrance, which continues to serve record numbers of visitors. A WSR designation could likely limit future needed transportation options such as light rail or highway improvement. Park County Commissioners have shown an interest in having the former railroad route available for emergency access in the event of blockage of US 89.
6. Given the tourism, recreation and agriculture-based economy of the Gardiner Basin, protection of Outstanding Remarkable Values (ORVs) will continue to be accomplished in partnership with private property owners dependent on the area's conservation values for their livelihood, as they have been for some time. Recreation ORVs continue to flourish and are not threatened.
7. Benefits of WSR designation are limited relative to what may be accomplished through other means.
8. Restrictions through zoning in conjunction with WSR designation could affect Church Universal and Triumphant's use of our land and waters that, according to our religious beliefs, we hold sacred. Disruption of land use improperly burdening our religious expression and practice would run afoul of religious freedom guarantees vouchsafed by the First Amendment to the U.S. Constitution.
9. There is a growing grassroots opposition within the Gardiner Basin and Park County to WSR designation for the Yellowstone River.

We appreciate this opportunity to comment on the referenced plan.

Sincerely,



Valerie McBride
President

Custer Gallatin Forest Plan Revision #50185

Thank you for Your Comment.

Your comment has been received by our system on 6/6/2019

Your letter ID is **50185-2788-8640**. Please save or print this page for your records.

Regards,

The Custer Gallatin Forest Plan Revision Team

Forest Fuels Reduction and Timber Production

We favor plan components that maximize forest fuels reduction and timber production. In our own experience, our timber harvesting improved forest resiliency by salvaging dead and insect-threatened trees, reduced forest fuels, provided increased growing space so that trees can better resist insect attack, and lowered wildfire mortality risk. Additionally, wildlife habitat was improved and economic benefit to the local community was realized.

Wilderness Areas

Generally, we favor fewer new designated wilderness areas to preserve flexibility needed to manage the forests. In our own experience, our timber harvesting improved forest resiliency by salvaging dead and insect threatened trees, reduced forest fuels, provided increased growing space so that trees can better resist insect attack, and lowered wildfire mortality risk. Additionally, our actions improved wildlife habitat and realized economic benefit to the local community.

Bison and Bighorn Sheep as Species of Conservation Concern or Focal Species

We do not think bison should be designated as a “species of conservation concern” and a “Focal Species”. Yellowstone bison populations are above targeted numbers and continue to increase at healthy rates. Additionally, quarantine facility utilization is increasing the movement of genetically pure bison populations beyond the Yellowstone Park ecosystem. Designation of bison as a “Focal Species” appears inappropriate.

Bighorn sheep are most visible in the Gardiner Basin during the winter months where I live. Judging from my observations of two bighorn groups, identification of them as a “species of conservation concern” or a “focal species” seems unnecessary. These groups appear healthy, well populated and thriving. Monitoring of populations, and health is an important criterion.

Bison

We wish to comment on the proposed Forest Service proposal for “a year-round self-sustaining bison population on the national forest” as it relates to the Gardiner Basin along the Yellowstone River. This proposal creates difficulties for the private property owners along the river valley. Forest Service holdings do not run continuously along the river but alternate with private lands which will be affected year-round. Geographically, the basin north of Gardiner along the river is relatively narrow. Bison favor lands along the river especially during winter

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and early spring, and their river presence affects much of the basin. While we appreciate this is a programmatic document at a planning-level scale, it leaves open significant questions regarding impacts, how bison population increases will be managed, costs of management, assignment of management responsibility, bison habitat improvements and long-term effects of the increased bison fencing which will likely be necessary, among other concerns. Given that bison are managed through the IBMP, we expect this proposal to be thoroughly evaluated prior to implementation. Until a proper evaluation is conducted, we do not support a year-round self-sustaining bison population in the Gardiner Basin along the Yellowstone River. Any Forest Service actions related to bison must comply with the IBMP. We object to the “no exceptions” provision related to bison management on Forest Service lands contrary to the IBMP.