# Custer Gallatin Land Management Plan Revision Objection Template

**Objector’s name**:      Nike Stevens

**Address**:      15300 Horse Creek Road, Bozeman, MT 59715

**Phone # or email**:            stevenswildlife@ earthlink.net

**Name of lead objector (if more than one)**:

**Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester’s list of species of conservation concern (SCC) by checking the applicable box:**

**X Land Management Plan**

* **Regional Forester’s List of SCC**

**Statement of issues and/or parts of the plan revision to which the objection applies:**

Lack of protection of Wilderness Study Areas. Lack of Wilderness recommendations for deserving Wilderness areas. Lack of acknowledgement of the Custer Gallatin National Forests’ history of disregarding legal requirement to protect Wilderness values. Inadequate protection of wildlife habitat especially wildlife movement corridors. Use of Backcountry designation which is legally meaningless and is misleading. The Backcountry designation sounds like it is keeping areas wild when in reality the designation offers no real protection.

**Concise statement explaining the objection and suggestion how the proposed plan should be improved:**

* **The reasons for this objection are**: A strong belief that the current proposed Forest Plan does not adequately protect wilderness and wildlife habitat within the Custer Gallatin National Forest and that if it is adopted as proposed it will result in decline of the Forest’s ability to support species sensitive to human disturbance and species whose long term genetic viability depends on connections between the Custer Gallatin National Forest and other wildlands. Disappointment at the lack of consideration of the role that uncut forested ecosystems have in mitigating our global warming crisis by storing carbon.
* **Proposed Solution:** Adopt Wilderness recommendations in Alternative D to remedy the deficits evident in the current proposed Custer Gallatin Land Management Plan. I specifically urge recommendation of the entire Hyalite Porcupine Buffalo Horn WSA as designated Wilderness because of its unique important as habitat for sensitive species such as Grizzly, wolf, and bighorn sheep and a link to wildlands to the north and west. I recommend the proposed Plan adopt the wilderness acreages recommended in Alternative D in the Lionhead, Crazy Mountains, Bridger Mountains, Pryor Mountains and additions to the Lee Metcalf Wilderness including the Cowboy Heaven area and additions to the Absaroka and Beartooth Wilderness. Many of these areas have been preserved through sacrifice of other areas to development at Big Sky and other places and have been part of earlier Wilderness legislation that failed to pass by some political quirk despite wide support locally and nationwide. They all have true Wilderness quality and the potential to buffer sensitive wildlife populations from the threats of increasing human recreation pressure and human caused climate change in the future. It is an unfortunate circumstance that mountain bikers and motorcyclists have been allowed to run rampant over WSAs and that the Forest Service has failed in its legal requirement to protect the wilderness character of some of these areas – however now is the time to remedy those mistakes not to enshrine them within the new Forest Plan. If you continue with the proposed Forest Plan you are committing to loss of Wilderness quality landscapes that will be sorely needed by humans for peace, beauty and tranquility and by sensitive wildlife for survival in the future.

The Custer Gallatin National Forest Land Use Plan must recognize that only through strong legal protection as designated Wilderness can wild landscapes and habitat for sensitive wildlife be maintained in the future given the intense pressure of ever increasing human recreation on these landscapes. Any door that you open now will increase use 2X, 5X, 10X in the future.

I also want to state that theGallatin Forest Partnership and its predecessor the Gallatin Community Collaborative do not represent me or most other people even locally. The group was set up in a way that excluded anybody with a job a family or any significant time commitment. From the get go it ignored science basically divided people in groups of wants ie motorheads, mountain bikers, resource developers or Wilderness advocates. What was lacking was a voice for wildlife and data on what were the most unique and important resources the Forest offered and in what areas. The Forest Planning team needs to recognize the limited relevance of the Partnership.

I also believe that the list of sensitive species is ridiculously short excludes all of the large wilderness reliance species that reach in some cases their southernmost range in Greater Yellowstone ecosystem of which the Custer Gallatin makes up a large segment and that by being inadequate it wrongly and probably illegally limits the proposed Forest Plan.

As a wildlife biologist who has worked on bighorn sheep I believe that disease risk in bighorn sheep should be directly addressed in the Forest Plan. The Custer Gallatin includes large areas of excellent bighorn habitat only some of which is currently occupied. Outstanding occupied and unoccupied bighorn habitat within the Custer-Gallatin NF such as the Beartooths, Gallatins and Pryors should be managed to maintain their value for bighorn sheep. Pack goats, domestic sheep and vegetation management using goats or sheep should not be permitted in bighorn sheep habitat or anywhere near (buffers of 20 miles are recommended). Most domestic sheep and goats carry *Mycoplasma ovipneumoniae,, Mannheimia hemolytica* and other pneumonia bacteria that transmitted to bighorn cause significant all age mortality and often depress lamb survival for decades. It is critical to minimize the risk of contact as much as possible since there is no available vaccine or treatment for wild bighorn sheep. One nose to nose contact between a bighorn and a domestic sheep or goat can spread disease to the bighorn sheep and then back to the bighorn population and their linked herds causing declines that will last decades.

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**Statement demonstrating the link between objection and prior formal comments: I submitted comments in earlier comment periods – including in June, 2019. I attended a week of meetings of the Forest Collaborative until I was bored stiff and convinced that only those who were paid to attend could afford to spend the enormous amount of time required. It was also clear that the Collaborative was ignoring the science regarding the importance of wildlife habitat in the Hyalite Porcupine Buffalo Horn Wilderness Study Area. I also attended at least one public meeting near the initiation of the process.**

**Signature:              Nike G Stevens**

**Send written objections to:** USDA Forest Service, Objection Reviewing Officer, Northern Region, 26 Fort Missoula Road, Missoula, MT 59804.

Office hours are Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding Federal holidays. Given current health and safety guidelines an appointment must be made in advance.

**Send objection online at: https://cara.ecosystem-management.org/Public//CommentInput?Project=50185** Electronic submissions must be submitted in a format that is readable with optical character recognition software (e.g., Word, PDF, Rich Text) and must be searchable. An automated response will confirm that your electronic objection has been received.

**Send faxed objections to:** (406) 329-3411.

The fax coversheet must include a subject line with “Custer Gallatin Land Management Plan Objection,” or “Custer Gallatin Species of Conservation Concern” and should specify the number of pages being submitted.

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8:00 a.m. and 8:00 p.m., Eastern Standard Time, Monday through Friday.