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Comments: Attached and printed [ndash] these are my review comments on the draft documents showing preliminary need to change the existing CGNF Forest Plans and the assessment report.

I will also mail a hard copy.

These reports are a good start to this Forest Plan Revision Process.

Don

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Forest Service

Attn: Forest Plan Revision

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Forest Plan Revision Team:

Please consider these review comments when finalizing the following documents: Draft Preliminary Need to Change the Existing Custer and Gallatin Forest Plans; and Draft Assessment Report of Ecological, Social and Economic Conditions of the Custer Gallatin National Forest.

The [ldquo]Need to Change[rdquo] document points to the [ldquo][hellip]vast landscape with dramatic differences between montane and pine savanna ecosystems with corresponding differences in species assemblages and habitat need.[rdquo] The proposed assessment and resulting plan will emphasize a consistent management approach and direction. This is a challenging goal which can be achieved with the enlightened planning and administrative team of the CGNF. However, a future Forest Service management efficiency examination may conclude that the Ashland and Sioux Ranger Districts could be best administratively managed, given logistics and ecotype, through consolidation with the Black Hills National Forest under overall supervision of USFS Region Two. The need to change document could reflect this future option.

In general this need to change report is well presented and accurately reflects the changing conditions of the past 30+ years and the increased understanding of the Forest Service responsibility toward the public trust obligations the agency assumes under the laws and administrative orders. However, a few comments are necessary in this review.

The document correctly identifies a need to develop plan direction related to areas which are known or suspected to contain naturally occurring geologic hazards, in noting that much of the western portions of the forest are in an active seismic area; acknowledging the 1959 Earthquake Lake event. Utilize US Geologic Survey definitions of geologic hazards thus avoiding inclusion of snow avalanches which are sometimes considered such. However, the Forest Plan should note the public service administrative role the CGNF provides in hosting the USFS National Avalanche Center and the Gallatin National Forest Avalanche Center at the CGNF Supervisors Office.

Plan direction for utility right of way and communication sites (cell towers, etc.) is important for future planning and administrative response. Power line corridors must not compromise designated Wilderness or Wilderness Study Areas. Inventoried Roadless and other sensitive Areas are compromised by corridor development which must be judged by need and values lost.

The 2012 forest planning requirements are a welcomed revision especially in the area of landscape recognition and ecological process. New information and science application for forest assessment and planning purposes is crucial in the development of the forest plan outcome. Further examples of new information needs to guide the revised plan, in addition to the comprehensive list you have provided, is the corridor identification and

connectivity potential for wildlife between the Greater Yellowstone Ecosystem and areas to the north and west of the Gallatin portion of the CGNF. An example of this would be from the Gallatin Range through the Bridger Range and into the Big Belt Mountains of the Lewis and Clark National Forest; or westward into the Madison, Tobacco Roots, Gravelly and Centennial Ranges of the Beaverhead Deer Lodge National Forest.

The need for plan revision to guide timber harvest activities primarily in lodgepole pine, is evident from viewing timber stand conditions in the Hyalite drainage. The post war cutting activities visually illustrate the flawed concept of sustained-yield which now must be reexamined and redefined. Suitability at the time was based upon the volume and access. Rotational time cycles were over-estimated and now defy prediction. It appears that the clear-cuts of the past will not regenerate to an economical volume within a century time span, despite silvicultural treatment such as replanting and thinning to stimulate growth release. Changing climate should also inform suitability of further production and current criteria must be examined to determine if it is applicable to predicted conditions. Forest Management criteria must be carefully reexamined in context with the ecological services provided by forested lands, such as wildlife habitat, watershed protection, soil fertility and scenic values. It appears that few lands on the Custer Gallatin National Forest, at least the west portion of the forest are suitable for timber production on a sustained yield basis and that timber harvest based upon other criteria must be carefully examined for need, fiscal responsibility and suitability.

Optional Plan Components should include a statement as to the management integration of CGNF in the Greater Yellowstone Ecosystem. This would include participation in the Greater Yellowstone Coordinating Committee and relationship with other GYE agencies. Plan components should integrate with GYE goals and objectives to the extent possible and consider for example, such matters as providing bison habitat without current MT Department of Livestock zoning constraints.

Optional Plan Content should offer a statement on the role collaborative groups which have formed and dissolved or are active in matters of forest plan revision development, specifically the Custer Gallatin Working Group. This statement should also look at the role Farm Bill Legislation and State authority has in the management of the CGNF.

Finally, this report should discuss the establishment of Coarse Filter/Fine Filter planning approaches to the conservation of biological diversity in the Forest Plan Revision Process, since the original forest plans were developed in the [lsquo]80s.

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The Draft Assessment Report of Ecological Social and Economic Conditions is a very informative document. I have never seen a US Forest Service publication which has introductory quotes by such disparate individuals as Colin Powell, Claude Monet, David Brower and Ed Abby. Though 3 of those persons will never see the results of this effort, we who review the assessment should benefit from their wisdom. I[rsquo]ll respond topic by topic

where necessary.

Climate: Include whitebark pine decline and rise in invasive species.

Soils linked with Climate, Air Quality and Watershed: Anticipate rising dust pollution wind events from upwind exposed/denuded soil origins, and seasonal deposition on snow cover resulting in earlier melt and diminished water yield.

Terrestrial Wildlife Ecosystems and Species: The value of the CG wildlife is well stated as is the ecosystem linkage with Greater Yellowstone. Wildlife direction and challenges frame desired planning outcomes and should guide this all important management plan. The inclusion of bison as a species of interest is bolstered by the Draft Terrestrial Wildlife Report and illustrates how the CGNF recognizes the availability of suitable habitat for this animal.

Timber: The use of the jurisdictional classification of [ldquo]Gallatin County[rdquo] is confusing when estimating [ldquo]tentatively suitable[rdquo] acres for timber harvesting. The 14 percent cited can be interpreted to include the substantial acreage of private and school trust lands included in the county boundary[rsquo]s. Is that the case or are you estimating the amount within the National Forest portion of the county? Figure 16 is somewhat ambiguous in that respect, and it appears that the Hyalite Porcupine Buffalo Horn WSA and Cabin Creek is included in the estimate. As I stated on the Need to Change report, observation of the area south of Bozeman indicate the economic and ecological sustainability criteria, and shows the need for reevaluation on a forest-wide basis. The report states: [ldquo][hellip]there is now a better understand of how forest harvesting can be used as a tool to restore habitat and ecosystems.[rdquo] This assumption should not be the sole criteria to guide the process when developing managment guidelines.

Minerals: This section was accompanied by an excellent report by Pat Pierson who demonstrated his knowledge and experience from years as staff on the Forest. In the Assessment Report under conclusions, while health and safety implications of mineral extraction is listed, the addition of environmental degradation from mining activities would is needed. The identification of potential candidate mineral withdrawal areas to avoid this impact would be helpful; for instance, on the Emigrant and Crevice area proposals.

Existing Designated Areas: This informative section would benefit from an estimation of the percentage of designated Wilderness areas on the CGNF compared to other GYE, Region 1 and national system units. Now that land exchange efforts have consolidated most of the HPBH Wilderness Study Area it is appropriate for it to again be reviewed for suitability for preservation. The travel plan decision to allow mechanized use should be mentioned as it was for Cabin Creek, and suitability judged in the absence of this disturbance. It is appropriate for the report to mention the failure of the Gallatin Community Collaborative to reach a consensus

recommendation about the HPBH WSA. Despite 3 years of discussion, principally over travel management, boundaries and designation classification, this impasse illustrates the reliance we must place on federal agency responsibility for public land management decisions. Use the established and informed process to come to a management conclusion through suitability analysis preserves the public trust doctrine as it applies to federal land for all citizens.

Thank you for the opportunity to review these documents.

Sincerely,

Don Bachman