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Comments: Please see attachment.

Thank you for the opportunity to comment on the Custer Gallatin National Forest Plan Revision (FPR) documents. My comments are specific to the Wild and Scenic Rivers Eligibility Study Process (Draft EIS, Section 3.22.3, Page 835). As a Custer Gallatin National Forest employee, I participated in the initial FPR Team discussions regarding this process back in January 2017.

Per DEIS, Page 836, [ldquo]all named and free flowing streams/rivers within the Custer Gallatin NF boundary were considered.[rdquo] It is my belief that the FPR Team missed one specific named and free flowing stream that being Black Sand Springs. I brought up Black Sand Springs during the initial meeting, but my comments were immediately dismissed because Black Sand Springs was not a named stream per the Forest generated list. It is definitely free flowing for over a half mile. A spring by definition is a point at which water flows from an aquifer to the earth[rsquo]s surface. Assuming the spring is not captured similar to nearby Whiskey Springs, a spring is considered free flowing. Black Sand Springs is named on the current USGS 7.5[rsquo] quad and CGNF maps. If it is free flowing and it is named, why wasn[rsquo]t it analyzed during the eligibility study? The answer to this question is because it didn[rsquo]t show up on the CGNF[rsquo]s GIS layer.

Black Sand Springs is an amazingly unique and diverse aquatic system. It is one of the few spring creeks within the Greater Yellowstone Area. There are a couple similar spring creeks that drain the Yellowstone Plateau but they are located on the Caribou-Targhee National Forest. At the spring, nearly 20 cubic feet second of crystal-clear water gushes from beneath the earth[rsquo]s surface. This is bigger than 90% of the other streams discussed within the eligibility analysis. The stream channel widens to over 80 feet with very shallow glide habitat and smooth laminar flow making it incredibly easy to observed the aquatic life beneath. Hence the name, the substrate consists of black obsidian sand and gravel. The stream meanders its way for approximately a half mile before joining the South Fork Madison River.

The FPR Team did discussed Snow Flake Spring but eventually dismissed this spring because it fell within the half mile wide corridor being discussed along the upper Gallatin River. If Snowflake Springs can be discussed, why can[rsquo]t Black Sand Springs be discussed?

I am asking that the FPR Team discuss and document the Outstanding Remarkable Values (ORV) for Black Sand Springs. Please don[rsquo]t dismiss its eligibility because of a naming rule. Also, not all appropriate resource specialists were present during the initial FPR Team meeting. Only one the of the many resource specialists in attendance had ever laid eyes on Black Sand Springs including the several long-tenure CGNF employees. To dismiss Black Sand Springs because of a GIS issue and lack of institutional knowledge is a major process flaw that needs to corrected before your eligibility list is finalized.

The Draft Plan on Page 177 describes Black Sands Spring in the following manner, [ldquo][hellip]. high quality wetlands, riparian, associated upland communities and aquatic ecosystems and its geologically unique spring source origin.[rdquo] If I am not mistaken, this statement includes several resource specific conditions that are considered ORV[rsquo]s.

If you agree with my logic on why this named free flowing stream should be discussed and considered, I have included why I believe each of the resource specific ORV[rsquo]s apply to this unique and diverse stream:

Scenery

The scenery around Black Sand Springs (BSS) is incredible and ever changing throughout the year. There is a scenic overlook located just above the springs. With the smooth crystal-clear waters, people enjoy watching the large lake run rainbow and brown trout spawning in the shallows. These large trout attract other predator and scavenger wildlife like bald eagles, osprey, king fishers, otters, and grizzly bears that people also enjoy watching.

Black Sands Spring is one of the few open waters in Hebgen Basin during the winter. As a result, wildlife are attracted to these open waters like waterfowl, trumpeter swans, moose, otters, etc.

Pairs of tree cavity nesting ducks call BSS home during the nesting season.

Black Sand Springs meanderers through reference condition riparian vegetation with snow cover Kirkwood Ridge as a back drop.

The explosion of yellow monkey during the summer and the steam rolling off the earth warmed waters in the winter are impressive.

The beauty of BSS is endless and ever changing.

Geology

There are only a handful of springs that drain the Yellowstone Plateau, but there are only a couple that flow through the obsidian sand outflow of Hebgen Basin. Nowhere else do we have obsidian sand outflow on the Custer Gallatin National Forest.

Fisheries

By the Fisheries ORV, BSS does not meet the definition because it isn[rsquo]t occupied by native cutthroat trout. Several native non-game species (mountain whitefish, suckers, sculpins and possibly longnose dace) inhabit BSS during most if not all their life stages. Best of all, all aquatic species can be easily be viewed by casual observer within the crystal-clear and smooth waters.

Montana Fish, Wildlife and Parks recently made the decision of stop stocking Hebgen Lake to sustain the recreation fisheries and rely exclusively on natural reproduction. Past research has shown the BSS has the highest density of spawning lake run trout in Hebgen Basin. MFWP[rsquo]s decision makes the high-quality habitat along BSS just that much more important.

Recreation

Black Sand Springs is not a destination fishery but it is extremely important to sustaining one of the top 10 destination recreational lake fisheries in Montana. As mentioned early, MFWP relies exclusively on high quality habitat throughout Hebgen Basin to sustain this very important recreational fishery.

Not every stream has a drivable scenic overlook allowing easy access for those who want to enjoy the beauty and richness of this unique aquatic habitat. If BSS was located in nearby Yellowstone National Park, there would be a board walk along it. Because of these reasons, BSS is a tremendous teaching resource for schools of West Yellowstone. On many occasions, I found myself teaching grade school aged kids about fish/invertebrate

ecology and water quality while my co-workers were off in the nearby woods discussing fire and wildlife ecology. You can not find a better outdoor classroom for young students and adults.

Even one of CGNF[rsquo]s Forest Leadership Team members recently commented about his childhood memory of noodling for brown trout beneath the undercut banks.

Wildlife

As does the scenery, wildlife inhabiting BSS varies by the season. During the trout spawning seasons, predators and scavengers are attracted including osprey, bald eagles, otters, and occasional bears.

During the summer nesting season, pairs of cavity nesting waterfowl can be observed.

During the winter months when BSS is one the very few open waters in Hebgen Basin attracting moose, otters, waterfowl, and occasionally trumpeter swans.

Botanical (Other)

During the initial FPR Team meeting, neither an archeologist or botanist were assigned to the team providing input on their respective ORV[rsquo]s.

In the current Forest Plan, BSS is considered a Botanical Special Emphasis Area because of its diverse aquatic plant assemblage. For this reason alone, I believe the Botanical Special Emphasis Area most definitely meets the definition of the Botanical ORV described in DEIS. If nothing else, the explosion of wildflowers does meet the Scenery ORV definition.

Cultural/Historical

There are several archeological sites at and within the near vicinity of the springs. These sites were not discussed. Knowing the boot legging history of Hebgen Basin, there is a high likelihood that the clean, cold, and crystal-clear waters of BSS were used to distill whiskey.

As you have read, I am very passionate about Black Sand Springs as well as most of my fisheries co-workers regardless of their agency affiliation. Black Sand Springs is a world-class resource that needs long-term protection above and beyond the designated Botanical Special Emphasis Areas and existing temporary instream water rights. In my opinion, Black Sand Springs is the most threatened and at the same time most unique stream within the boundaries of the Custer Gallatin National Forest. Black Sand Springs should not be deemed eligible because it is threatened, it should be deemed eligible because of its unique and outstanding resource values.

In reading the Draft Plan direction (Section 3.7.7, Page 177), the are no protection measures listed within the Desired Condition, Goals, or Suitability sub-sections that directly address the biggest threat to Black Sands Spring; that being water withdrawal. I ask that FPR Team to consider including additional language in the Suitability sub-section that Black Sands Spring is not suitable for water withdrawals.

I am asking that the FPR Team, associated line officers, and steering team members please revisit their previous decision(s) not to include Black Sand Springs as an eligible stream. I ask that everyone please take the time for a few site visits throughout the year to see the ever-changing conditions and richness of wildlife. Please don[rsquo]t just stop at the overlook; get out and walk the entire half mile. If so, I think everyone will reach the same conclusion as I have over the last 35 years. Life-time memories are made at places like Black Sand

Springs!

If the FPR Team stills believes that Black Sands Springs is not eligible, I ask that additional protection measures be included in the Final Plan that addresses these real and future threats.