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Comments: Please accept these comments on the Custer Gallatin National Forest (CGNF) Draft Plan and Draft Environmental Impact Statement (DEIS). The Pew Charitable Trusts aims to preserve ecologically and culturally diverse publicly owned lands and waters through congressionally designated wilderness and wild and scenic rivers, and administrative protections. Consistent with these goals, we have an interest in the implementation of the Forest Service's 2012 planning rule, particularly as it applies to the identification and management of Recommended Wilderness Areas (RWAs), eligible Wild and Scenic Rivers, and the utilization of management tools that best maintain and enhance big game habitat and migration corridors.

Summary of recommendations

The Pew Charitable Trusts supports a variety of land use designations that are contained within Alternatives A, B, C, and D, with appropriate management direction. Pew generally supports the Wild and Scenic river eligibility findings within the Draft Plan and DEIS. We recommend eligibility for all 30 of the stream reaches that were identified as eligible in the draft, with the inclusion of modifications to the findings for six of those reaches. We also recommend that the Forest reconsider its finding of ineligibility for six additional reaches identified below and identify them in the final Plan as eligible for inclusion in the National Wild and Scenic Rivers System. Finally, Pew recommends that the Forest adopt the management direction outlined in Alternative C in order to best protect habitat connectivity for migrating big game and improve big game winter ranges and migration corridors.

Recommended wilderness areas and other land use designations

The 2012 planning rule requires the Forest Service to determine whether to recommend areas for wilderness designation during the plan revision process (36 CFR 219.7(c)(2)(vii)). Chapter 70 of the 2015 Planning Directives provides specific guidance for the wilderness inventory and evaluation process. Pew recommends that the final Plan incorporate the following land use designations:

Land use designations in Alternative C

Alternative C incorporates the Gallatin Forest Partnership's (GFP) collaborative proposal for the Madison, Henry's Lake, and Gallatin Mountains Geographic Area, which offers a balance of conservation, recreation, and other land uses, while addressing watershed health, wildlife habitat, and connectivity. It represents a mix of recommended wilderness areas, backcountry areas, recreation emphasis areas, and lands identified as suitable for timber production. The Pew Charitable Trusts generally supports the land use designations and management direction identified in the GFP proposal, and recommends that they be included in the final Plan.

Land use designations identified in other Alternatives

Pew supports the following additional and/or expanded land use designations and management direction identified in Alternatives A, B, and D.

* Recommended additions to the Absaroka-Beartooth Wilderness that preserve the current boundaries of existing Recommended Wilderness Areas: Line Creek Plateau, Red Lodge Creek/Hellroaring, Mystic Lake, Burnt Mountain, and Republic Mountain (Alternative A).

- * Additional Recommended Wilderness Areas in the Absaroka-Beartooth Geographic Area: Red Lodge Creek, East Rosebud to Stillwater, West Woodbine, Chico Peak, Emigrant Peak, and Dome Mountain (Alternative D).
- * Retaining and expanding the existing Lost Water Canyon Recommended Wilderness Area in the Pryor Mountains (Alternative D).
- * Recommended Wilderness Areas in the Big Pryor, Bear Canyon, and Punch Bowl areas of the Pryor Mountains (Alternative D).
- * Recommended Wilderness Areas in the Tongue River Breaks, King Mountain, and Cook Mountain areas of the Ashland Ranger District (Alternative D).
- * Recommended Wilderness Areas in the Crazy Mountains (Alternative D).
- * The Backcountry Area in the Bad Canyon area of the Absaroka-Beartooth Geographic Area managed with no motorized or mechanized recreation (Alternative B).
- * The Backcountry Area in the Chalk Buttes Area of the Sioux Ranger District (Alternative D).

Management of recommended wilderness areas

Pew strongly supports the management direction in Alternatives C and D that deem motorized uses and mechanized means of transport unsuitable in those areas that are recommended for wilderness designation. The 2012 planning rule for land management planning requires the Forest Service to provide for [ldquo]management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo] [36 CFR 219.10(b)(1)(iv)i.] The management direction in Alternatives C and D restricting motorized and mechanized transport is consistent with this requirement.

By the same rationale, CGNF should reject management direction found in Alternative B that would permit the use of non-conforming uses in recommended wilderness. Such management direction would be wholly inconsistent with the planning rule[rsquo]s requirement that wilderness characteristics be maintained in RWAs. Non-conforming uses such as motorized and mechanized use would be strictly prohibited in these areas should Congress act to include them in the National Wilderness Preservation System. Motorized use and mechanized transport diminishes several wilderness characteristics that are expressly defined in the Wilderness Act (16 U.S.C. 113(c)3): [ldquo]primeval character,[rdquo] [ldquo]outstanding opportunities for solitude or a primitive and confined type of recreations,[rdquo] and ecological and scientific values.

Permitting non-conforming uses in RWAs before Congress has had an opportunity to act would permanently degrade the wilderness character of these areas, and is inconsistent with the USFS[rsquo] obligation to preserve and protect the wilderness character of RWAs. The Forest Service has an affirmative responsibility to protect and preserve the wilderness character of RWAs, and adopting an alternative or management direction that would permit such uses in these areas would conflict with this responsibility.

Eligible wild and scenic rivers

The Custer Gallatin National Forest includes numerous natural-condition streams that warrant protection under the provisions of the Wild and Scenic Rivers Act of 1968 (P.L. 90-542: 16 U.S.C. 1271-1287). The 2012 planning rule requires the Forest Service to identify rivers eligible for inclusion in the National Wild and Scenic Rivers System (36 CFR 219.7(c)(2)(v) and (vi)). The CGNF[rsquo]s updated inventory of eligible rivers found 30 stream

reaches to be eligible for designation under the Wild and Scenic Rivers Act in its Draft Plan and DEIS. While Pew generally supports the eligibility determinations for all 30 stream reaches, we recommend that the Forest modify the eligibility findings for six of those reaches as follows:

* Bear Creek, Pryor Mountains: Pew recommends that the eligibility determination for this reach be expanded to 7.5 miles to include its full headwaters; classify the stream as [ldquo]wild[rdquo] in recognition of the fact that it is currently only accessible by trail; and incorporate additional scenery, recreation, and cultural outstandingly remarkable values (ORVs) that recognize the canyon[rsquo]s visually striking limestone character, incredible hiking and birding opportunities, and cultural importance.

* Big Creek, Gallatin Mountains: Pew recommends that the eligibility determination for this reach incorporate additional recreation and scenery ORVs to acknowledge the exemplary hiking, hunting, and horsepacking recreation along the creek, as well as the visually striking limestone cliffs and water-carved canyon draining the Gallatin Range.

* Cabin Creek, Madison Mountains: Pew recommends that the eligibility determination for this reach incorporate additional recreation, scenery, and geology ORVs in recognition of this popular trailhead, and the rare, visually stunning reef-like scarp and fault zone that was the epicenter of the 1959 earthquake that created Quake Lake.

* Slough Creek, Absaroka Mountains: Pew recommends that the eligibility determination for this reach incorporate additional recreation and wildlife ORVs in recognition of the importance of the drainage to horsepackers and hikers, as well as grizzly bears, wolverines, and migrating deer and elk herds.

* West Boulder River, Absaroka Mountains: Pew recommends that the eligibility determination for this reach incorporate additional fisheries and scenery ORVs in order to recognize the important trout fishery and regionally stunning setting that draws anglers from afar.

* Yellowstone River, Absaroka, Sawtooth and Gallatin Mountains: Pew recommends that the eligibility determination for this reach incorporate additional fisheries ORV to acknowledge that the free-flowing Yellowstone River provides core habitat and the critical fish migration corridor that connects every tributary in the upper watershed, both inside and outside of Yellowstone National Park.

Additional rivers recommended for wild and scenic eligibility

The DEIS and Draft Plan describe a valuable list of stream segments wholly deserving of Wild and Scenic eligibility designation. In addition to the 30 streams proposed to be found Wild and Scenic eligible, we recommend that the USFS revisit its eligibility determination for the six stream reaches described below. All six streams are free-flowing, free of impoundments, and possess at least one rare, unique or exemplary Outstandingly Remarkable Value (ORV). They variously provide essential habitat for riparian vegetation, including rare plant communities; habitat for diverse wildlife that are essential to the dynamic ecological health of the forest, including big game, birds, rare and common fish species, invertebrates, and insects; clean water for municipal and agricultural uses; unique recreational opportunities; and inherent scenic and natural values. Pew recommends that all six of these streams be found eligible for inclusion in the National Wild and Scenic Rivers System:

Bear Creek, Absaroka Mountains: This scenic creek north of Yellowstone National Park combines beautiful scenery with Montana[rsquo]s mining history and important wildlife habitat, all threatened by a proposed gold mine. Jardine, a unique ghost town on the forest, is an old mining community along Bear Creek that provides a sense of history to visitors. The beautiful setting along Bear Creek showcases the Absaroka Mountains upstream and the Yellowstone Plateau downstream across the Yellowstone River. Above Jardine, the valley provides occupied wildlife habitat for wolverines, core habitat for grizzly bears, and a migration corridor for deer and elk. Recommended ORVs:

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- * History (ghost town)
- * Scenery (ghost town, wild valley views)
- * Wildlife (wolverine and grizzly bear habitat, elk and deer migration routes)

Buffalo Creek, Absaroka Mountains: Home to a thriving population of native Yellowstone cutthroat trout, a Forest Service [ldquo]sensitive species.[rdquo] This lower-elevation, core wildlife habitat supports a migration corridor and is important to the long-term ecological integrity of the unique Greater Yellowstone Ecosystem (GYE).

Recommended ORVs:

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- * Fisheries (sensitive species, and angling via hiking and horsepacking)
- * Scenery (large, wild, roadless, lower-elevation valley in the Absarokas)
- * Wildlife (migration corridor and core habitat)

Hellroaring Creek, Absaroka Mountains: Hellroaring Creek is a rare stronghold for genetically-pure, native Yellowstone cutthroat trout. The creek is also home to an exemplary, remote and challenging whitewater paddling run through spectacular scenery, with Class IV-V whitewater that is one of the best in the region. Situated north of Yellowstone National Park, the Hellroaring Valley is home to a diverse array of wildlife species including elk, moose, gray wolves, wolverines and grizzly bears. Like Buffalo Creek, this valley is integral to the ecological integrity of the GYE.

Recommended ORVs:

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- * Fisheries
- * Recreation (whitewater paddling)
- * Wildlife (core habitat)

Porcupine Creek, Gallatin Range: Porcupine Creek drains the southern end of the Gallatin Range, and provides outstanding, diverse recreational opportunities in all seasons, including exemplary mountain biking, hiking, hunting, cross-country skiing and horseback riding. The stream has also carved a large valley that provides critical winter range for elk in a Wildlife Management Area, and habitat for wolves, grizzly bears and others. The scenery is stunning, showcasing the Gallatin Range above a wildflower-studded valley in the spring.

Recommended ORVs:

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- * Recreation (biking, hiking, hunting, skiing and horsepacking)
- * Scenery (verdant valley framed by Gallatin Range)
- * Wildlife (elk winter range)

South Fork Madison River, Hebgen Basin: The South Fork Madison River is home to a population of Westslope cutthroat trout, and is projected to provide cold water refugia for salmonids over the next 30 years. It is also unique in its healthy wetlands and riparian areas, featuring beaver dams and willow thickets which provide fish and wildlife habitat for moose, grizzly bear and trout alike.

Recommended ORVs:

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* Fisheries (native cold water refugia)

* Wildlife (unique habitat).

Taylor Fork River, Madison Mountains: The headwaters of the Taylor Fork are home to one of the only native Westslope cutthroat trout fisheries in the Madison Range. The Taylor Fork is not only popular with horse-packers, hunters, anglers, backpackers and wildlife photographers, but also provides an exemplary, road-accessible Class II-III packrafting and whitewater kayaking run through a beautiful valley, perfect for the beginning creek-boater and loaded with wildlife viewing opportunities. The stream flows over a colorful bed of stones with incredible

clarity in late Summer. Home to the densest population of grizzly bears in the Lower 48 states, the Taylor Fork also supports robust ungulate and bird populations. There are few other places on the Forest that feel as wild and beautiful as the Taylor Fork Valley, whether in the road accessible lower reaches or the roadless upper reaches draining the stunning Taylor Peaks.

Recommended ORVs:

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* Fisheries (native fish stronghold for Gallatin River)

* Recreation (paddling, hiking, wildlife viewing, angling)

* Scenery (water clarity, immense peaks, verdant valleys)

* Wildlife (habitat, viewing, migration corridors)

Big Game Winter Range and Migration Corridors

The 2012 Planning Rule requires consideration of ecological connectivity at multiple scales to provide landscape linkages that facilitate the movement of species (FSH 1909.12). New technologies, such as GPS-enabled collars that allow biologists to track animal movements in real time, have dramatically enhanced knowledge about the movement characteristics of large ungulates such as mule deer, elk, and pronghorn, including length and location of migration routes in the Custer Gallatin National Forest.

The study of movement corridors has shed light on how land uses such as roads, energy development, and residential encroachment can impede important populations of big game and other species. Blocked or altered migrations can affect access to food sources, movement to hospitable elevations when seasons change, or breeding behavior. Additionally, the increase in motorized recreation is also having an impact on animal behavior.

A recent study evaluating trail-based recreation effects on elk revealed that displacement of elk from forest roads open to motorized traffic often exceeded 0.5[ndash]1.5 km.¹ This avoidance response by elk to open road

density, has been documented consistently and overwhelmingly in many studies conducted over the past decade. Avoidance by elk to recreation trails and recreationists represents a form of [ldquo]habitat compression.[rdquo] This can ultimately lead to large scale population shifts by elk from public forests to private lands, thus eliminating hunting and viewing opportunities on public lands (Proffitt et al., 2013).

In February 2018 Secretary of the Interior Ryan Zinke issued Secretarial Order 3362, [ldquo]Improving Habitat Quality in Western Big-Game and Migration Corridors.[rdquo] The order calls on the agency to work with state and tribal wildlife managers to improve the habitat quality for the winter range of western big game and provide migration corridors that will allow these animals to safely undertake their seasonal travel.³

In response to this Secretarial Order, Montana Fish Wildlife and Parks (MFWP) have identified the area from Yellowstone National Park to Paradise Valley as a priority big-game winter range and migration corridor. This corridor hosts multiple iconic wildlife species and connects the world-renowned Yellowstone National Park with the adjacent Paradise Valley. Since the 2000[s]s, several GPS collaring studies have documented Northern Yellowstone elk movement and migration patterns. MFWP[s] own analysis of this data has revealed specific migratory routes using Brownian bridge movement models and revealed a high level of fidelity especially by elk to their winter ranges, summer ranges, stopovers and migration corridors covering much of the Absaroka

1. Elk responses to trail-based recreation on public forests Michael J. Wisdom, Haiganoush K. Preisler, Leslie M. Naylor, Robert G. Anthony, Bruce K. Johnson, Mary M. Rowland

2. *ibid.*

3. Secretarial Order 3362 [ldquo]Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors[rdquo]

Beartooth Mountains Geographic Area, and parts of the Madison, Henrys Lake, and Gallatin Mountains Geographic Area.⁴

This data also reveals that the Northern Yellowstone elk wintering area outside of Yellowstone National Park is centered around Dome Mountain Wildlife Management Area and surrounding private ranchlands.⁵ However, in making their journey to this crucial winter range, there are important stopover locations in the Gallatin Mountains Geographic Area where additional protective designations would best contribute to the protection of habitat connectivity for migrating big game, in a manner that would be complementary to the state priorities for improving big game winter ranges and migration corridors. Two unique management tools listed in the DEIS that best serve to protect this priority migration corridor as well as other priority big game migration corridors include backcountry

areas and key linkage areas.

Key Linkage Areas

In the DEIS, a key linkage area has been identified near the Custer Gallatin National Forest boundary in the Bridger Mountains north of Bozeman and near Bear Canyon and Trail Creek southeast of Bozeman, where wildlife movement is desirable for genetic exchange between blocks of public lands. Components in the revised plan alternatives require that management activities in key linkage areas include design features to restore, maintain or enhance habitat connectivity to facilitate daily and seasonal movements.⁶

Backcountry Areas

In the DEIS, backcountry areas would be maintained as generally undeveloped or lightly developed, meaning they would typically have no roads, or a few primitive roads. With an emphasis on low development, backcountry areas would have lower disturbance from noise and human disturbance than non-designated areas. Backcountry areas provide a higher degree of protection from human disturbance than non-designated areas.⁷

Recommendation

The 2012 Planning Rule requires this revised plan to address connectivity. In order to best protect habitat connectivity for migrating big game in a manner that would be most complementary to MFWP state priorities for improving big game winter ranges and migration corridors, Pew recommends that the Forest adopt the general management direction outlined in Alternative C.

The management direction of Alternative C represents a collaborative agreement between multiple stakeholders with the goal of striking a balance between protecting the remote backcountry that defines the region and accommodating the recreation passions of growing communities nearby. This balanced approach protects current diversity and abundance of wildlife species in the Gallatin and Madison Mountain Ranges while also being the most viable option to best maintain and enhance habitat connectivity in the forest. Notably, Alternative C consists of plan components for key linkage areas to further protect potential wildlife migration areas that have been identified in scientific literature (Walker and Craighead 1997, Claar et al. 2003, Western Governors[rsquo] Association 2008, Cushman et al. 2009, Wade et al. 2015), as well as Custer Gallatin connectivity modeling results as important for wildlife movement between intact ecosystems.⁸

1. Montana State Action Plan, DOI Secretarial Order 3362, page 4

5 *ibid.*

6 Draft Environmental Impact Statement for the Draft Revised Forest Plan [ndash] Custer Gallatin National Forest page 595 7 Draft Environmental Impact Statement for the Draft Revised Forest Plan [ndash] Custer

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Conclusion

We commend the planning team for its hard work, appreciate this opportunity to comment on the Custer Gallatin National Forest Draft Plan and Draft EIS, and look forward to continuing our engagement in this important planning effort. If you have any questions about these comments, please feel free to contact us.