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First name: Colin

Last name: Cooney

Organization: Trout Unlimited

Title: Montana Field Coordinator

Comments: Please accept the attached comments from Trout Unlimited (TU) and Montana Trout Unlimited (MTU) on the Draft Plan/Draft Environmental Impact Statement (DEIS) for the Custer-Gallatin National Forest (CG) plan revision and comments on the Species of Conservation Concern (SCC) list. We offer our comments after reviewing the documents and supportive information. Please contact me with any questions.

Thank you,

Colin Cooney

Please accept the following comments from Trout Unlimited (TU) and Montana Trout Unlimited (MTU) on the Draft Plan/Draft Environmental Impact Statement (DEIS) for the Custer Gallatin National Forest (CG) plan revision and comments on the Species of Conservation Concern (SCC) list. We offer our comments after reviewing the documents and supportive information.

Trout Unlimited represents 300,000 members and supporters nationwide and remains one of the nation's oldest coldwater fisheries conservation organizations. The mission of Trout Unlimited is to conserve, protect and restore coldwater fisheries and their watersheds. In Montana we have 4,500 members and 13 local TU chapters that have a passion for the conservation of coldwater fisheries located on the Custer Gallatin National Forest. Additionally, TU is an active participant in regional land and fisheries management planning issues, both on and off the Forest. Trout Unlimited has participated in the plan revision process for the CG National Forest since the beginning, providing review comments on the assessments, need for change, and scoping recommendations. With these comments, we wish to thank the CG National Forest for creating a strong plan revision that attempts to meet the challenges and management opportunities for this forest over the next 15-20 years.

We have a few concerns with the DEIS/Draft Plan, outlined below and discussed in further detail in this letter:

1. Trout Unlimited is concerned with the lack of species representation for aquatic habitat ecology in the SCC list. The 2012 Forest Rule identifies protecting watershed health and clean water as

its primary purpose, a high priority and in taking proactive approaches in maintaining and restoring aquatic ecosystems.

1. There is a distinct lack of discussion and management approach in the DEIS for the Yellowstone cutthroat trout (YCT), westslope cutthroat trout (WCT) and Arctic Grayling. Since it has not been included in the SCC list, TU recommends that discussion on management opportunities and conservation actions for YCT, WCT and Arctic Grayling be further explored in the Final Plan.
2. The DEIS/Draft Plan has identified 536 possible abandoned and inactive mine sites on the Custer Gallatin Forest. The Final Plan needs to include better analysis for the significant problems associated with these sites. The draft EIS/draft Plan appears weak in terms of how better management approaches for protecting watershed and terrestrial habitat will be addressed.

#### General DEIS/Draft Plan Discussion

In addition to our organizational comments, Trout Unlimited and Montana Trout Unlimited supports and has endorsed the Gallatin Forest Partnership Agreement. The GFP is a coalition of partners coming together to create a shared vision for public lands within parts of the Bozeman, Yellowstone and Hebgen Ranger Districts. This Agreement has identified ecological, economic, recreational, social and wilderness character values and has proposed management recommendations for each.

#### Specific Issues Discussion

1. Lack of species representation for aquatic habitat ecology on the SCC list. The 2012 Forest Planning Rule has adopted the Species of Conservation Concern list as a way manage habitat conditions for various sensitive species and prevent the potential federal listing of certain species. This is in addition to the Regional Forester Sensitive Species list (RFSS). We were dismayed to see that aquatic environment was not considered in any form on the SCC. With the significant role of rivers and streams in the CG Forest and the occurrence of three native salmonid species (Yellowstone cutthroat trout, Westslope cutthroat trout and Arctic Grayling) on the forest, we believe the Forest should reconsider the list and add an aquatic ecology component to the Final EIS. The draft Plan states [ldquo]A decline in westslope and Yellowstone cutthroat trout numbers in the montane portion of the planning area has occurred during the past several decades due primarily to invasive species, habitat alteration, and changes in climate. Westslope cutthroat trout and Yellowstone cutthroat core or conservation populations currently occupy approximately 9 percent and 46 percent, respectively, of their historic range within the plan area.[rdquo] We are concerned that the Forest does not find these issues serious enough to include those fish species on the SCC list. Loss of habitat, declining numbers and climate stressors more than qualify WCT and YCT to be elevated from the RFSS list to the SCC list.

According to the State of Montana, Arctic Grayling are a status (S) 1 Species of Concern due to extremely limited and/or rapidly declining population numbers, range and/or habitat, making it

highly vulnerable to global extinction or extirpation in the state. Additionally, the State of Montana ranks WCT and YCT as S2 Species of Concern because of very limited and/or potentially declining population numbers, range and/or habitat, making it vulnerable to global extinction or extirpation in the state.<sup>1</sup>Based on the numerous science-based studies on WCT, YCT and Arctic Grayling population genetics and population viability cited in

biological evaluations for the forest by previous fisheries biologists, we suggest the CG reconsider not including them on the SCC

list. We fear that without those fish species or even native trout habitat on the SCC list, it will be too easy for them to not receive the same level of emphasis and protection and responsibility for future conservation efforts—and these efforts will fall on outside agencies and organizations. This is evident already in the DEIS and Draft Plan, as the management objectives for native trout are lacking sufficient description and consideration.

1. There is a distinct lack of discussion and management approach in the DEIS for Arctic Grayling, Yellowstone cutthroat and westslope cutthroat. The 2012 planning rule includes strong requirements for maintaining and restoring watersheds and aquatic ecosystems, among other items, in the planning area. While the DEIS and Draft Plan included priority watersheds and conservation watershed networks, the discussion on how Arctic Grayling, WCT and YCT will be protected is lacking. The draft Plan states [ldquo]Forest streams drain into the Madison, Gallatin, and Yellowstone Rivers; major Missouri River tributaries. Many streams contain native Yellowstone or westslope cutthroat or arctic grayling; some with particularly important conservation populations.[rdquo] Additionally, the draft Plans Desired Condition under the Conservation Watershed Network, it states, [ldquo]Conservation watershed networks have high quality water and habitat and functionally intact ecosystems that support native fish, aquatic, and other riparian-dependent species and contribute to conservation and recovery of westslope and Yellowstone cutthroat trout, arctic grayling, native prairie fish assemblages, and aquatic species of conservation concern.[rdquo] While we appreciate the plan noting the importance of these species and their conservation, we believe there needs to be additional guidelines and goals specific to their conservation and recovery.

For example, it is mentioned in Volume 2, Appendices, the BLM Billings Field Office 2015 RMP Aquatic and Fisheries goal includes [ldquo]Yellowstone Cutthroat Trout bearing waters and associated riparian habitat will be managed to protect all ecological values necessary to maintain or enhance Yellowstone Cutthroat Trout populations (using guidelines outlined in the Conservation Strategy for Yellowstone Cutthroat Trout in the States of Idaho, Montana, Utah, Nevada, and Wyoming).[rdquo] We believe The Conservation Strategy for YCT in Montana would be a great strategy for the CG Forest to adopt forest wide and would be a great goal to add into the Final Plan.

We request a more thorough discussion in the Final Plan that provides mitigation requirements and monitoring approaches for making sure Arctic Grayling, WCT and YCT receive the necessary

focus for maintaining their long-term status in the CG Forest. This is particularly important considering increased fires, warmer water temperatures brought on by climate change factors, and potential impacts from industrial activities and significant loss of habitat. We believe the Final EIS and Plan needs to elaborate further on the impacts that Arctic Grayling, WCT and YCT are currently challenged with, the protection efforts that will be needed to maintain connectivity, resiliency and habitat integrity, and the actions the CG Forest will take to address all these factors.

1. The DEIS/Draft Plan needs to include better analysis for the significant problems associated with the hundreds of abandoned mines throughout the forest. As the DEIS/Draft Plan mentions, the CG National Forest has a significant mining activity history. These activities threaten coldwater ecology, water quality and quantity, riparian habitat and terrestrial habitat. According to the draft EIS, 12 stream segments in the Absaroka- Beartooth are listed on the 303(D) list of impaired streams due to mining activities and abandon mines. These impacts also harm downstream users such as those communities dependent upon drinking water, agricultural enterprises, and recreational pursuits. Trout Unlimited recommends the Final Plan provide more management objectives for cleaning up abandoned mine and preventing current and future impacts from mining activities. The current actions discussed in the DEIS/Draft Plan fail to adequately cover how the forest will protect its future.

While we appreciate the draft Plan setting guidelines that new mineral development operations should minimize adverse effects to aquatic and riparian resources, we believe the Forest can also provide stronger management objectives and protective measures in the Final EIS/Final Plan for watershed protection. Currently as written, it fails to do this. We urge the CG Forest to incorporate stronger stipulation measures that better guide mining activities on this forest.

These include stronger requirements for pipeline construction, surface disturbance and road impacts. They can also include requirements for water quality monitoring where mining projects are proposed. A stronger monitoring and reporting process can also be incorporated into the plan's objectives and strategies. In other words, the CG Forest should not be complacent just because there are so few federal regulatory protections for mining on national forest lands. The planning process is where stronger management direction can be provided and TU requests that the Final EIS and Plan incorporate those measures.

1. Riparian Management Zones need to make specific exemptions for restoration work and projects. We appreciate how much detail the forest put in Riparian Management Zones (RMZ). TU believes RMZs are an extremely important tool to protect riparian corridors, wetlands, intermittent streams, and other areas near surface water that are critical for maintaining the integrity of aquatic ecosystems. However, one addition we would like to see in the Final Plan under RMZs is more specific wording allowing structures, boat ramps and access points in RMZs that ultimately protect the majority of the riparian area, also called designated sustainable river access points. A lot of the stream bank and riparian area restoration work TU does involve

projects that enhance river access opportunities for a broad group of river-users, while protecting the natural characteristics of the river corridor. Riparian areas are protected by focusing river access to designated sustainable locations while hopefully keeping people off rest the riparian vegetation. We believe this meets the guideline of land use activity preformed in an RMZ while riparian and aquatic conditions are maintained, restored,

or enhanced, and would appreciate it being specifically mentioned in the Final EIS and/Plan.

1. The Forest Service's assessment of conditions on the Custer Gallatin Forest, the agency routinely cites grazing as the most wide-spread management activity that influences the health of stream habitats. We appreciate the draft Plan Guidelines stating, "[New or revised allotment management plans should be designed to maintain stream habitat and water quality by minimizing sediment delivered to watercourses and degradation to streambank stability from livestock grazing in riparian]", however nowhere in the draft Plan does it mention the need to end existing grazing practices that are degrading streams and restore streams that have been impacted by grazing. We believe in order to put the new grazing guidelines into practice, the areas already effected by grazing need to be recognized and have a restoration plan in the final plan.

## Conclusion

Despite the above five items of concern we have addressed, we do believe the DEIS/Draft Plan has been thoughtfully developed and support the CG's efforts in providing a document that will guide the forest for the next 15-20 years. We appreciate all the work that has gone into this planning effort.

We remain committed in our efforts to participate in this planning process.