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Comments: Please see the attached PDF to view our formal comments

Please consider the below comments submitted by the Theodore Roosevelt Conservation Partnership (TRCP) on the Custer Gallatin National Forest (CGNF) draft forest plan (DFP) and draft environmental impact statement (EIS). The TRCP is a national conservation organization working to guarantee all Americans a quality place to hunt and fish and we represent more than 90,000 individual members, including 2,700 members within the state of Montana.

First, we want to express our appreciation for the work that you have done to pull together diverse stakeholders and develop a draft forest plan that attempts to balance competing interests over challenging natural resources issues. We realize that this is no easy task and we commend your efforts. As an organization we strive to find common ground and workable solutions, while still doing the right thing for our natural resources. Our comments are framed from that perspective.

Gallatin Forest Partnership

The TRCP would like to express our support for the Gallatin Forest Partnership and its efforts to develop a landscape scale approach to conservation recommendations in the Gallatin and Madison Ranges.

As part of this process, diverse stakeholders have come together for many years to put their differences aside and focus on creating land management solutions for these areas that benefit all. We support this process and believe that broad-based agreements like these should be given special consideration.

2.3.10 Forested Vegetation (VEGF)

The TRCP supports responsible active management that benefits fish and wildlife habitat and ecological integrity, diversity, function, and resiliency. We support management objectives and guidelines that are focused on habitat improvement and climate resiliency.

2.3.15 Wildlife (WL).

We appreciate the DFP's attention to landscape patterns and connectivity and we generally support the desired conditions, goals, objectives, standards and guidelines for wildlife.

We ask that in addition to connectivity, the forest plan add specific conservation measures for big game migration corridors. As you may be aware, recent efforts spearheaded by the US Department of the Interior in February of 2018 through the issuance of Secretarial Order 3362, [Idquo]Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors,[rdquo] has resulted in an increased focus by state and federal agencies on the mapping and conservation of migration corridors.

Through this effort, individual states, including Montana Fish, Wildlife, and Parks (FWP), have received resources to analyze fine-scale GPS collar data of ungulates to drastically improve their understanding of big game movements, which is being done with technical assistance provided by the Wyoming Migration Initiative. The intent of this project is to help individual states gain a more complete and precise understanding of the exact location of individual migration routes, including stopover areas and bottlenecks.

We ask that you consider the accompanying map (Appendix - below) of known elk migration routes created by the Wyoming Migration Initiative and that you develop and include desired conditions, goals, objectives,

standards and guidelines for the conservation of elk, mule deer, pronghorn, and bighorn sheep migration routes in the final plan.

This could be done for wildlife species commonly enjoyed by the public under 219.9 of the planning rule or by establishing [ldquo]management[rdquo] areas under 219.7 wherever big game migration corridors have been mapped by the state wildlife agencies. We believe that the proposed desired conditions, goals, objectives, standards and guidelines developed for connectivity in the draft EIS could be modified to apply to identified migration corridors, although they would need to be applied at a finer level given the precise locations and inelastic nature of migration routes in comparison to connectivity zones. As a result of this, we believe standards should be applied in addition to guidelines to safeguard mapped corridors. Finally, because new science continues to be collected on the exact location of wildlife migration corridors, we believe that the CGNF plan should be adaptive and plan for/consider migration corridors that could be mapped after the forest plan is complete.

We expect refined maps for corridors to become increasing available to land managers and the public in the coming year and we hope that the CGNF final forest plan includes measures aimed at conserving these vital habitats.

Big Game (WLBG)

We appreciate the focus given to big game in the DFP and request an increased emphasis be given to the restoration and enhancement of winter range, including addressing conifer encroachment and noxious weeds.

In regards to the below guideline, not only should disturbance be minimized when big game are utilizing winter range, but management actions should be designed to enhance or improve habitat conditions for native ungulates whenever possible. We request that you add this direction to your guidelines.

To avoid stressing wildlife when energy demands are high, management activities should be located and scheduled to minimize disturbance of wild ungulates on winter ranges during the winter and in known calving, fawning, lambing, or kidding areas during the reproductive season. Exceptions may occur when needed for protection of other resources as mandated by law, regulation or policy. In such cases, management actions should be concentrated in time or space to reduce impacts to native ungulates.

2.4.38 Inventoried Roadless Areas (IRA)

TRCP appreciates the explicit direction in the plan to manage IRAs consistent with the 2001 Roadless Area Conservation Rule, as well as the language under suitability in the DFP that recognizes that

[ldquo]Inventoried roadless areas are suitable for restoration activities that can be accomplished consistent with the 2001 Roadless Area Conservation Rule.[rdquo]

2.4.45 Recommended Wilderness Areas (RWA)

The TRCP support wilderness as a management tool for the highest-value areas with wilderness characteristics. We believe that areas with outstanding opportunities for primitive and unconfined recreation that also are resilient and have little need or potential for active vegetation management for the purposes of wildlife habitat or community protection should be proposed for inclusion in the wilderness preservation system. Wild areas, or subsets of larger areas, that deserve protections but also need continued active stewardship to maintain habitat function, such as big game winter range, are potentially most suitable for the backcountry area concept. We believe that recommended wilderness and backcountry areas could fit together similarly to the way wilderness and conservation management areas fit together on the Rocky Mountain Front in the Lewis and Clark National Forest.

2.4.46 Backcountry Areas (BCA)

TRCP supports the backcountry area concept and management approach and the strong standards tied to the management of these areas. These areas should provide for high-quality dispersed hunting and fishing opportunities. We appreciate that backcountry areas are suitable for purposes of restoration or wildlife habitat enhancement and see these as a good fit for wild country with long-term habitat restoration and enhancement needs.

2.4.49 Land Status and Ownership, Access (LAND)

A loss of access is commonly cited as a reason hunters stop hunting. In 2018, the TRCP partnered with onX on a report titled, "[dquo]Off Limits, But Within Reach[rdquo]" that identified 1.52 million acres of federal public lands within the state of Montana as entirely inaccessible, including 76,000 acres managed by the US Forest Service. We ask that the CGNF prioritize future fee title and easement projects to open these and other difficult to access national forest lands to the public for outdoor recreation. This should not only include working to resolve some of the current access conflicts in the Crazy Mountains, but looking to areas where access conflicts could arise in the future because access easements have not been secured.

Coldwater Fisheries

We request that the CGNF final forest plan include a more complete discussion and specific management approaches for Arctic Grayling, Yellowstone cutthroat trout (YCT) and westslope cutthroat trout (WCT). WCT and YCT currently occupy approximately 9 percent and 46 percent, respectively, of their historic range within the plan area and are considered Status 2 Species of Concern by the state of Montana 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. Arctic Grayling are considered Status 1 Species of Conservation Concern by Montana 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. We urge the CGNF to elevate those species to the SCC list and for the Final Plan to have a more thorough discussion that provides mitigation requirements and monitoring approaches to ensure Arctic Grayling, WCT and YCT receive the necessary focus, maintaining their long-term status in the CGNF.

Conclusion

Thank you for your consideration of our comments and for your service on behalf of America[rsquo]s public lands. We stand ready and willing to offer additional input as you work towards the completion of the Custer Gallatin National Forest plan.