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First name: Darcie
Last name: Warden
Organization: The Greater Yellowstone Coalition
Title: Montana Conservation Coordinator
Comments: Please see the attached PDF for the Greater Yellowstone Coalition's full objections. We will also submit a CD of our objections plus those of our eligible supporters to the Bozeman CGNF office. Thank you for your consideration and for all of your work through the plan revision process!

September 4, 2020

Objection Reviewing Officer

USDA Forest Service, Northern Region

Building 26

Fort Missoula Road

Missoula, MT 59804

Submitted online at https://cara.ecosystemmanagement.org/Public//CommentInput?Project=50185

Re: Custer Gallatin 2020 Land Management Plan, DROD, and FEIS Objections

To whom it may concern,

Thank you for the opportunity to provide objections on the Custer Gallatin National Forest 2020 Land management Plan and Final Environmental Impact Statement (FEIS).

The Greater Yellowstone Coalition (GYC) previously submitted public comments on the Proposed Action on March 5th, 2018 as well as the Draft Revised Forest Plan and DEIS June 4th, 2019. These comments related to topics including areas of Tribal importance, recreation, vegetation, climate change, Wild and Scenic Rivers, watersheds and riparian areas, wildlife, the various designated areas within the National Forest, and the Gallatin Forest Partnership agreement. The following objections relate to the content of our previous comments. By objecting we hope to clarify our prior comments, point out remaining shortcomings in the planning documents, and provide practical solutions to aid in the creation of a robust, balanced, and effective final plan.

We were pleased by many aspects of the 2020 Land Management Plan, and we thank the Forest Service for reflecting aspects of our previous comments. We recognize that the plan adopts major aspects of the

Gallatin Forest Partnership agreement and we appreciate the explicit acknowledgement of the Partnership's work in the Draft Record of Decision. We are also glad to see the recommendation of 30 eligible Wild and Scenic Rivers, improved monitoring for human-wildlife conflict, area-specific Tribal plan components, partnership goals to address the uncertainties of climate change, and more. We thank the Forest Service for its work up to this point and strive to support you as you wrap up the plan revision process.

There remain several issues touched on in our previous comments that we feel the Forest Service either failed to address or insufficiently addressed. We therefor offer the following objections and management recommendations to improve the final plan.

Gallatin Forest Partnership Agreement

Objection: The 2020 Plan fails to incorporate key aspects of the Gallatin Forest Partnership (GFP) Agreement, which were essential factors that won the agreement unprecedented community support.

There are many aspects of the GFP agreement incorporated into the 2020 Land Management Plan, and we are pleased to see that adjustments were made to incorporate some of the GFP[rsquo]s comments on the Draft Revised Forest Plan. We are also grateful for the Forest Service[rsquo]s explicit acknowledgement as [ldquo]the most compelling[rdquo] proposal for the future of the Gallatin Range (DROD p15). We believe the collaborative approach and area-specific focus of the GFP agreement benefits the most to achieve resolution in areas like the Gallatin Range, and we are pleased that the Forest Service sees the value in this work.

Therefore, we feel it is important that the new Forest Plan accurately reflect the pieces of the GFP agreement that allowed such diverse supporters to find agreement. Some of these, like new recommended wilderness protecting the heart of the Gallatins, are straightforward and obvious in their significance. Other aspects, like the subtle yet long-deliberated language balancing wildlife and recreation needs, were equally essential in our shared vision for the Gallatin Range.

GYC supports the full objections submitted by the GFP on the 2020 Land Management Plan and FEIS. The GFP[rsquo]s objections and corresponding recommendations are written to help the final plan accurately reflect the most important aspects of the GFP agreement and do not represent all nuances of the GFP agreement. We understand that the final plan will represent a compromise for all interested parties. Rather, the GFP[rsquo]s objections highlight only the issues that were centrally important during the years spent developing the agreement and those that remain equally critical today. By incorporating them, the Forest Service will ensure that the Gallatin components of the final plan receive the same overwhelming, diverse community support that the GFP agreement has generated. In particular, the major issues are as follows:

[bull] The Hyalite Recreational Emphasis Area fails to live up to the vision proposed by the GFP.

[bull] The 2020 plan fails to recommend wilderness in key areas in the Gallatin and Madison ranges.

[bull] The 2020 plan fails to fully protect the Buffalo Horn Backcountry Area as envisioned by the GFP agreement.

[bull] The 2020 Plan fails to provide adequate protections for wildlife in the face of growing recreation pressure in the Gallatin Range.

[bull] The 2020 Plan includes inconsistent and confusing direction that requires clarification.

Management Recommendations:

[bull] Fully incorporate the remedies suggested in the Gallatin Forest Partnership[rsquo]s objections in order to accurately reflect the critical components of the agreement.

Grizzly Bear

As one of the last remaining intact temperate zone ecosystems on the planet, the GYE hosts important habitat for a variety of important and iconic wildlife species. The CGNF encompasses much of the Montana portion of the GYE. With large amounts of wild, secure land, the CGNF hosts crucial core habitat for a wide variety of native species and provides the doorstep for wildlife connectivity to other ecosystems in the Northern Rockies.

Our supporters have a strong interest in management that affects wildlife of the GYE. We advocate for

thriving populations of grizzly bears, wolves, and ungulates in Greater Yellowstone and work to maintain important ecological processes like migrations and long-distance dispersal. Our work blends policy advocacy with on the ground projects that reduce conflicts with wildlife, remove barriers to wildlife movement, and build public support for the iconic species of Greater Yellowstone.

Our focus for this objection remains on adequate habitat protections for grizzly bears outside of the Recovery Zone/Primary Conservation Area (RZ/PCA), due to the important role the CGNF can play in ensuring connectivity between the GYE and other grizzly bear recovery areas. It is our goal to ensure that the GYE population remains robust and eventually connects to the Northern Continental Divide Ecosystem (NCDE) and other populations as part of one large interconnected Northern Rockies grizzly bear metapopulation. Montana is home to the two largest grizzly populations in the lower-48 and large landscapes characterized by open space. The opportunity to see the conservation vision for connected grizzly populations to fruition is an issue unique to Montana that science-based management of CGNF lands will help facilitate.

Objection 1: The CGNF must extend habitat protections that limit road density, developed sites, and prevent livestock conflict beyond the RZ/PCA to include all forest land within the Demographic Monitoring Area (DMA), in order to ensure the forest provides for a stable population of grizzly bears over the long-term.

We are disappointed the CGNF has still not addressed our previous concerns regarding habitat protections for grizzly bears in lands outside of the RZ/PCA. As we mentioned in our comments on the proposed action, we believe this is taking the bare minimum approach to grizzly bear conservation. GYE grizzly bears occupy roughly 45,000 sq. km (~17,000 sq. mi), and the RZ/PCA only comprises 23,853 sq. km (9,210 sq. mi), barely half of the currently occupied habitat. On the CGNF, 56% of currently occupied grizzly habitat sits outside of the RZ/PCA but within suitable grizzly bear habitat (Page 26, CGNF Assessment Wildlife Report).

The 2016 Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem (CS) commits

to managing for a stable GYE population within the DMA. The CGNF must incorporate plan components that will ensure adequate habitat protections for meeting this goal. Yet despite this requirement the final CGNF plan is still lacking in specific assurances for grizzly bears outside the RZ/PCA. As we note in our comments on the Proposed Action, [ldquo]Expanding the habitat standards, which are designed to protect grizzly bears, to the area that grizzly bears are counted towards the population and recovery criteria is logical and necessary to ensure a stable population into the foreseeable future, and to help ensure the Forest Service meets connectivity and at-risk species persistence requirements under the 2012 Planning Rule.[rdquo] We included an extensive review of the science supporting the role of secure habitat, developed sites, potential for conflict with people, and potential for conflict with livestock on grizzly bear survival in our comments on the Proposed Action and DEIS.

Secure habitat

In our comments on the Proposed Action, we emphasized the importance of maintaining and promoting secure habitat throughout the DMA to maintain a stable population and noted that any decrease in secure habitat within the DMA could potentially impact population stability. Page 422 of the FEIS states, [ldquo]There are no specific plan components that would preclude reductions in secure habitat outside the recovery zone. However, given the existing restrictions in designated wilderness areas, plus a variety of restrictions on new motorized transport for other resource reasons outside the recovery zone, it is reasonable to expect that future reductions in secure habitat outside the recovery zone over the life of the plan would be minor.[rdquo] While this conclusion of minor future reductions in secure habitat outside of the RZ/PCA over the life of the plan may have merit due to other land designations, the reality is that there are substantial portions of the CGNF outside of the RZ/PCA where habitat is already no longer secure (Figure 28, Page 408, FEIS). It is true that current conditions have been adequate to facilitate grizzly bear expansion well beyond the RZ/PCA, however it is also the case that any further reduction in secure habitat in heavily used portions of the forest could negatively impact grizzly bear survival through increased potential for conflict with people, especially considering the rising recreational demand and use occurring on the forest. For these reasons, the CGNF should commit to no additional reductions in

secure habitat in areas outside the RZ/PCA but within the DMA that are not otherwise protected from other land management designations. The Conservation Strategy for the Grizzly Bear in the Northern Continental Divide Ecosystem (NCDE) establishes zones of habitat management outside of the PCA. Zone 1 and the PCA collectively form the DMA, and management direction for this area states, [ldquo]Here, habitat protections will focus on managing motorized route densities within levels specified in current Federal, State, and Tribal land use plans because these are known to have been compatible with a stable to increasing grizzly bear population.[rdquo] This habitat direction was incorporated in the Flathead Forest Plan as part of the recent forest plan revision process and concurrently added to management direction for the Helena, Kootenai, Lewis and Clark, and Lolo National Forests as part of the Forest Plan Amendment to integrate the NCDE Grizzly Bear Conservation Strategy into forest plans. At a minimum, the CGNF should be striving for consistency with NCDE management direction in order to achieve the stated desired condition of grizzly bear connectivity. There should not be a disparity in management approach between forests critical for grizzly bear conservation within the same Forest Service region.

Developed Sites and Recreation

We also recommend habitat protections related to human activity and associated potential for conflict with grizzly bear throughout the DMA. Page 431 of the FEIS states, [ldquo]Designated wilderness areas account for 44 percent of National Forest System lands outside the recovery zone, in which no new developed sites would be allowed. Land use allocations in the revised plan alternatives for recommended wilderness areas, backcountry areas, and key linkage areas would also limit new developed recreation sites and other developments outside the recovery zone (FW-STD-RWA 01-06; FW-STD-BCA 01-07; FW-GDL-WL 03, 04). [rdquo] However, page 430 of the FEIS also acknowledges (in reference to increased sanitation and attractant storage efforts at developed sites on the CGNF), [ldquo]As a result, bear-human conflicts have shifted away from developed sites, and are now more frequently associated with surprise encounters in back-country scenarios (Frey and Smith in (van Manen et al. 2019)).[rdquo] Rising recreational demand associated with growth in communities surrounding the CGNF will

only exacerbate this potential for conflict between grizzly bears and people. Regardless of restrictions associated with land designations like Wilderness and Recommended Wilderness, there are going to be more people showing up in secure grizzly bear habitat. Similar to our recommendations regarding secure habitat, the CGNF must commit to no increase in developed sites in areas within the DMA not otherwise protected by other designations, even if the portion these areas comprise of the total DMA are small. Rising visitor use will continue to increase potential for conflict and limiting increase in developed sites in all portions of the DMA is key to mitigating that potential. Given occurrences of backcountry conflicts are increasing, the CGNF must also include more specific management direction that will ensure maintaining high quality, secure grizzly bear habitat is a priority throughout the DMA in the face of rising recreational demand. The majority of grizzly bear mortalities are human-related; in 2019 32 of 45 known and probable mortalities in the DMA were human-caused (https://www.usgs.gov/data-tools/2019-known-and-probable-grizzly-bear-mortalities-greateryellowstone-ecosystem). The CGNF could commit to monitoring recreational use intensity. This could prove useful in making management decisions that might prevent conflict, thereby enhancing human safety and protecting grizzly bears.

Livestock grazing

Finally, we hope the CGNF will consider additional protections for grizzly bears in relation to potential livestock conflict within the DMA. Page 433 of the FEIS states, [ldquo]The primary difference in plan alternatives for use of domestic sheep or goats for weed control outside the recovery zone is that there would be no requirement for management actions to favor grizzly bears over livestock in the event of a conflict outside the recovery zone.[rdquo] The CGNF must manage for habitat conditions that contribute to a stable population of grizzly bears for the foreseeable future. Given sustainable mortality thresholds for grizzly bears are fairly low, it is not a stretch to consider that management removals resulting from conflict with sheep and goats outside the RZ/PCA and within the DMA could be detrimental to the goal of population stability. We strongly encourage the CGNF to adjust this language regarding use of domestic sheep or goats for weed control outside the recovery zone to convey management direction in

favor of grizzly bears in conflict incidences within the DMA.

Management Recommendations

[bull] Provide additional protections outside the RZ/PCA vital to ensuring a stable GYE population over the long-term through:

o Including a standard for no reduction in secure habitat in lands outside the RZ/PCA and within the DMA

o Including a standard for no increase in developed sites in lands outside the RZ/PCA and within the DMA

o Monitoring recreational use intensity within the DMA to obtain important information for future management actions that could prevent bear-human conflict during high risk time periods

o Expanding livestock grazing standard regarding use of domestic sheep and goats (FWSTD-WLGB 07) to the entire DMA

Objection 2: The CGNF should provide more specific management direction around roads and recreational use that will ensure secure habitat is conducive to grizzly bear occupancy in important connectivity areas.

GYC previously expressed concern over the 2016 delisting rule and CS failing to adequately address the lack of connectivity between grizzly bear recovery areas as a threat to the long-term persistence of grizzly bears in the lower-48 (Appendix A). The best available science indicates functional connectivity between isolated grizzly bear populations would restore the metapopulation structure that historically characterized grizzly bear presence within the intermountain west (Merriam 1922, Picton 1986, Craighead and Vyse 1996). Restoring a metapopulation structure will be important to the long-term persistence of grizzly bears in the United States (Proctor et al. 2005) because it will address genetic isolation which may pose a threat to GYE grizzly bears (Haroldson et al. 2010) and will likely create resiliency to environmental changes (Breitenmoser et al. 2001, Hedrick 1996, Hedrick and Gilpin 1996).

Therefore, as a threatened species in the contiguous lower 48 states under the U.S. Endangered Species Act (ESA) (40 Fed. Reg. 31,734 (July 28, 1975), grizzly bears should be recovered and managed as a large well-connected Northern Rockies meta-population. The premise of the CGNF approach to developing grizzly bear specific plan components is that incorporation of the habitat protections defined in the CS is adequate. However, the reality is that the CS failed to address GYE grizzly bear recovery within the larger context of the species as a whole. The CGNF is required by the National Forest Management Act (NFMA) 16 U.S.C. [sect] 1604(g)(3)(B) to manage for diverse plant and animal communities and maintain viable populations. Ultimately, viability for the species will depend on functional connectivity (i.e. dispersal and occupancy) between recovery areas. Section 7 of the ESA also requires that the Forest Service consider effects of forest plan components on the viability of GYE grizzly bears within a broader context, given the viability of lower 48 grizzlies depends on connectivity between populations that are currently isolated (https://www.fws.gov/endangered/lawspolicies/section-7.html).

Functional connectivity between the GYE and other recovery areas will require conditions that facilitate occupancy by male and female grizzly bears. Slow reproduction and establishment of female home ranges close to a mother[rsquo]s home range mean that range expansion occurs slowly for grizzly bears (McLellan and Hovey 2001, Schwartz et al. 2003). For male grizzly bears, dispersal over the distances between currently occupied ranges would likely take place over a year or even several (Peck et al. 2017, Proctor et al. 2004, McLellan and Hovey 2001, Blanchard and Knight 1991). At a minimum, dispersal for male grizzly bears requires conditions suitable for seasonal occupancy. To reiterate our comments on the DEIS and Proposed Action, [ldquo]Motorized access management in linkage areas between occupied habitats is an important component of maintaining genetic and demographic connectivity, and thus healthy and sustainable grizzly bear populations (Proctor et al. 2018). Demographic connectivity areas to the Cabinet-Yaak (CYE) and Bitterroot (BE) Ecosystems require no increase in road density using conditions that have allowed for female occupancy in zone 1 as the baseline.[rdquo] And, [ldquo]The Forest Service

must consider that roads (permanent or temporary, open or closed) and site development will increase

human-bear conflicts and grizzly bear mortality and affect the potential for connectivity through important linkage areas. Both roads and development significantly contribute to habitat deterioration and fragmentation and are the two strongest predictors of grizzly bear survival/mortality on the landscape (Mace et al. 1996, Schwartz et al. 2010). Road density is also strongly related to secure habitat, which is critical to the survival and reproductive success of grizzly bears (Mattson et al. 1987; IGBC 1994; Schwartz et al. 2010) and is primarily achieved through motorized access management.[rdquo] Despite the science that indicates occupancy will likely be an important element of connected populations due to the incremental nature of grizzly bear range expansion, the CGNF acknowledges that due to the large amount of human use, the Bridger key linkage area is not suitable for long-term or residential grizzly bear use and argues that managing the area as a movement corridor for dispersing grizzly bears is adequate (page 437, FEIS and appendix F, FEIS). Given the Bridger key linkage area may have a, [ldquo]low likelihood of sustaining resident grizzly bears free of conflict situations and subsequent management actions[rdquo] (Appendix F, page 191, FEIS), the CGNF must demonstrate that adequate habitat protections conducive to occupancy are in place in other areas of the forest important for connectivity. The CGNF points out that other potential connectivity areas are in large part protected by designated Wilderness, recommended wilderness, or backcountry area designations due to land use restrictions that limit development (page 438, FEIS). However, this logic does not account for potential stressors to grizzly bears associated with rising recreational demand, and it incorrectly assumes that proposed protections in key linkage areas and backcountry areas provide adequate protections to ensure grizzly bear occupancy over the long-term. While we appreciate the additions made to key linkage area plan components, we believe additional protections in key linkage areas and backcountry areas, as well as commitment to monitoring recreational intensity will be important for achieving the Forest[rsquo]s desired condition for GYE grizzly bears to connect with other ecosystems. The NCDE Grizzly Bear Conservation Strategy and Flathead National Forest Plan identify two Demographic Connectivity Areas at the northwest and southwest corners of zone 1, where the goal is to support female occupancy. Specifically, the areas are protected from no net increase in motorized route miles or density. Again,

the CGNF should be striving for consistency in management direction within Region 1 of the Forest Service that is likely to achieve the stated goal of connecting the GYE and NCDE populations.

Management Recommendations

[bull] Revise FW-DC-WLGB-02 (recommended additions underlined): Outside the recovery zone/primary conservation area, grizzly bears occur where habitat is biologically suitable and grizzly bear occurrence is socially acceptable. Availability of secure habitat contributes to habitat connectivity and occupancy, which facilitates grizzly bear movement between the Greater Yellowstone Area and other grizzly bear ecosystems. Human development is configured in a manner that strikes a balance between management needs to accommodate administrative and public use and habitat protection that allows for grizzly bear occupancy and human co-existence.

[bull] Establish plan components that will strengthen the likelihood that FW-DC-WL-07 (In key linkage areas, human disturbance does not limit habitat connectivity for wildlife, particularly wideranging species) is actually achieved. We recommend enhancing key linkage areas through:

o Expanding FW-GDL-WL-03 to include no increase in road infrastructure and explicitly limiting any increase in motorized access routes for any purpose in key linkage areas.

o Strengthening FW-GDL-WL-04 to state that there will be no net increase in permanent facilities within key linkage areas.

o Monitoring recreational use intensity within key linkage areas to obtain important information for future management actions that could prevent bear-human conflict during high risk time periods.

[bull] Strengthen protections in all backcountry areas of the forest to more accurately reflect the wildlife values of those areas through:

o Adding a desired condition to all backcountry areas similar to that of the Cabin Creek Recreation and Wildlife Management area: (MG-DC-CCRW 01 Big game and grizzly bear habitat provide foraging and security to allow wildlife to coexist with human use of the

area).

o Adding guidelines to all backcountry areas that new recreation special uses should not take away from wildlife protection and wild character.

o Restricting new permitted livestock grazing in backcountry areas.

o Identifying the current trail network (both system and non-system) in all backcountry areas and committing to no new trail construction thereafter (with the exception of a new trail proposed by the GFP in the West Pine BCA. We have committed to this trail as part of the GFP).

Objection 3: The Regional Forester must identify grizzly bears a Species of Conservation Concern (SCC) if or when they are removed from the federal list of threatened and endangered species.

As stated in our Assessment letter and re-emphasized in our comments on the Proposed Action and DEIS, [ldquo]The 2012 Planning rule (p. 36) states that species in the following categories must be considered for SCC designation (emphasis added):

[bull] [ldquo]Species that were removed within the past 5 years from the Federal list of threatened or endangered species, and other delisted species that the regulatory agency still monitors.[rdquo]

Grizzly bears are an umbrella species and a [ldquo]conservation reliant[rdquo] species, in that they will perpetually require efforts to conserve them on the landscape (Scott et al. 2005). Arguably, this reliance, the current genetic isolation of the Yellowstone population, and the relatively limited occurrence of bears within their historic range in the lower 48 calls for additional caution and therefore protections. These factors should warrant designation and the accompanying protections as a Species of Conservation Concern.[rdquo]

Management Recommendations

[bull] Identify grizzly bears as a Species of Conservation Concern if or when they are removed from the federal list of threatened and endangered species.

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Wolverine

Objection: The CGNF has not adequately addressed impacts of non-motorized and dispersed winter recreation on wolverine habitat availability.

As we stated in our Assessment letter, the wolverine is an imperiled species facing loss of habitat from climate change and recreational disturbance. Small populations are increasingly isolated. The U.S. Fish and Wildlife Service is currently re-evaluating whether listing of wolverine as threatened on the Endangered Species Act is warranted. Recent research suggests non-motorized dispersed recreation negatively impacts wolverine habitat use, resulting in loss of a substantial amount of high-quality winter habitat for females (Heinemeyer et al. 2019). We pointed out in our comments on the Proposed Action that recreational use is increasing on the forest and previously undisturbed areas are now supporting recreational pursuits that overlap with occupied wolverine habitat (Heinemeyer and Squires 2012, IDFG 2014).

The reality is that both winter motorized and non-motorized activities can potentially negatively impact wolverine and their use of natal denning areas (Heinemeyer et al. 2019, Copeland et al. 2007, Krebs et al. 2004 May et al. 2006, Rowland et al. 2003, Carroll et al. 2001). The CGNF acknowledges female wolverines react to both motorized and non-motorized winter recreation on page 472 of the FEIS and

identifies recreation uses such as skiing and snowmobiling as a key stressor for the species (page 463, FEIS). The CGNF even points out the science that indicates a likely increase in overlap between recreational use and wolverine distribution as snow cover declines (page 472, FEIS). Yet the CGNF also states on pages 204 and 205 of Appendix F (response to comments), [ldquo]As noted previously, large proportions of wolverine primary and maternal habitats are located within designated wilderness areas, where motorized over-snow use is not suitable. Although non-motorized winter recreation occurs in designated wilderness areas, these areas provide a high degree of protection from winter recreation impacts, since people simply cannot cover as much ground as quickly by non-motorized means as they can by motorized means.[rdquo] In this response, the CGNF fails to account for the best available science, which is well documented in the FEIS, that non-motorized recreation is likely to pose a threat to female wolverines. The statement on page 462 of the FEIS that the majority of maternal wolverine habitat is not expected to change due to its location within designated wilderness completely contradicts previous statements within the FEIS that acknowledge the potential for increasing overlap between nonmotorized recreational users and wolverine as areas of persistent snow cover decline. We encourage the CGNF to account for the best available science in any identification of important wolverine habitat and associated management actions.

Management Recommendations

[bull] Work with scientists to develop and apply more rigorous models of wolverine maternal and foraging habitat (based on habitat selection within individual home ranges) to the Custer Gallatin National Forest.

[bull] Create opportunity for winter closure areas in vital maternal and foraging habitat during the denning season to be warranted as part of future travel planning through:

o Revising FW-DC-WLWV 01 (recommended addition italicized and underlined): Forest and alpine habitat characterized by persistent snow cover and cooler temperatures provide high quality reproductive habitat, denning and foraging opportunities for wolverines.

High elevation habitat and associated micro-climates provide refugia and habitat connectivity for wolverines in the face of changing climates and increasing winter recreational use.

o Strengthening FW-GDL-WLWV by not precluding other forms of recreation management that might enhance secure habitat for wolverines during the reproductive denning season (I.e. allow the opportunity for evaluating the merits of winter closure areas in a future travel management planning effort).

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Bison

We provided substantive comments regarding bison in our Custer Gallatin Assessment Letter (pages 43-49), a joint letter for the Proposed Action (PA), and for the DEIS (pages 54-60) and raise similar concerns in the objections below. Our previous comments make a science-based rationale for why the Forest Service should have reconsidered bison as a Species of Conservation Concern (SCC). We are disappointed that bison were not included on the SCC list by the Regional Forester and continue to recommend that plan components support an arguably [ldquo]at risk[rdquo] species deserving of SCC status, and

provide the ecological conditions necessary to maintain and contribute to the long-term viability and persistence of bison.

Specifically, we want to see forest plan direction that will adequately promote a free ranging bison population that is broadly distributed both seasonally and year-round throughout existing tolerance areas outside YNP on CGNF system lands. We applaud the Forest for including a standard for habitat improvement projects, as well as some commendable guidelines and desired conditions for bison access to suitable habitats, adequate connecting corridors between suitable habitats, educational efforts and year-round presence of bison on the Custer Gallatin. However, we are concerned that the final plan weakened previous language and creates ambiguity that results in a plan that is unenforceable, lacks actionable steps to meet the desired conditions, goals, and guidelines for bison on CGNF lands, and fails to provide the ecological conditions necessary to maintain and contribute to the long-term viability and persistence of bison.

In our previous comments, we supported bison direction that would actively provide for bison habitat and promote access to year-round forage and presence on National Forest System lands as included in the DEIS Alternatives B and C, in addition to direction supporting a year-round self-sustaining bison

population on the CGNF as supported in the DEIS Alternative D. We also asked for clarifications of specific plan components and provided recommendations for additional components in response to the DEIS that were largely ignored in the revised plan. We strongly opposed the plan components in Alternative E of the DEIS which did not seek to facilitate bison habitat improvement projects and aimed to minimize impacts to livestock operations at the expense of supporting native bison within tolerance areas. The revised plan (Alternative F) appears to [ldquo]strikes a balance[rdquo] between Alternatives D (that we supported) & E (that we opposed). Plan component language that we supported in the DEIS has been changed and now either weakens the direction, is unclear, or is altogether concerning. For example, the Forest Service notes (p. 547, Vol. I FEIS) that [ldquo]Alternatives D and F go a step further than the other alternatives by including a desired condition for bison presence on the Custer Gallatin National Forest year-round with sufficient numbers and distribution to provide a self-sustaining bison population (FWDC-WLBI 04).[rdquo] While this is a commendable desired condition (DC) as written, the selected Alternative F adds language to this DC, that sufficient bison numbers and distribution be considered in conjunction with bison in Yellowstone, rendering it meaningless (see below). Furthermore, a [ldquo]desired condition[rdquo] for bison on the Custer Gallatin in no way ensures actionable steps are taken to facilitate expansion of bison into unoccupied, suitable habitat, nor does it represent a [ldquo]proactive management approach to facilitate bison expansion on the Custer Gallatin[rdquo] as is the stated intention of Alternative F (FEIS, p. 559). Though the single actionable [ldquo]standard[rdquo] calls for one habitat improvement project every three years in/or for the purpose of creating or connecting bison habitat, the language in this standard lacks enforceable direction that ensures facilitated expansion of bison on the forest or the habitat necessary to support an at-risk species on the landscape with sufficient distribution to be resilient to stressors, adaptable to changing conditions, and contributing to stable and increasing genetic diversity.

As we[rsquo]ve previously argued, though Yellowstone bison now have access to ~380,000 acres of land outside the Park, they are only using a small fraction of this area. The Interagency Bison Management

Plan is not meeting its goal of supporting a wild free-ranging bison population. This significantly constrained distribution of bison within the CGNF planning area not only raises concerns over the resiliency, adaptability and persistence of the planning area population, and therefore its population viability (see Appendix D in our DEIS comments), it also further perpetuates the significant management issues surrounding this population (i.e. dependence on the unacceptable practice of shipping bison to slaughter, unsafe and inhumane hunting in overcrowded small patches of land, etc.). While we realize constraints on their current distribution are due in part to current and past management actions and hunting, there is much more the forest should do, from a habitat perspective, to facilitate dispersal and use throughout current tolerance areas. Indeed, [ldquo]the key role of Custer Gallatin National Forest relative to bison is to provide and improve suitable habitat[rdquo] (emphasis added, Forest Plan Revision Assessment, page 134). Currently, there is a lack of contiguous suitable habitat providing effective corridor areas for bison to migrate and disperse farther out on the landscape and into suitable habitat areas in the Taylor Fork and Upper Gallatin within the west side tolerance area (Figure 18 from the Terrestrial Wildlife Report). Plan components must ensure that clear actionable steps are taken to identify, create, and manage for suitable bison habitat and corridor/migration routes for bison migrating from the Park to facilitate dispersal into areas within tolerance zones.

Our goal in this objection process is to offer a specific set of remedies (i.e. [ldquo]solutions[rdquo]) to strengthen and clarify the language of specific plan components. These remedies ensure plan direction is enforceable and will result in the Forest meeting the presumed intent of the desired conditions and selected alternative, and more specifically, that plan direction will ensure wild bison have access to suitable habitat and adequate connecting corridors to support bison expansion and broad distribution throughout existing tolerance areas to support both migrating bison and a self-sustaining year-round bison population on Forest lands.

Objection 1: Language in the Desired Condition FW-DC-WLBI-02 in the revised plan has been weakened and is no longer sufficient to support an arguably at-risk species deserving of SCC

status, as previously argued in our joint letter for the Proposed Action (PA).

[ldquo]FW-DC-WLBI-02 Suitable habitat supports a year-round bison presence on the Custer Gallatin National Forest. Habitat accommodates bison migrating out of Yellowstone National Park in winter, as well. Adequate connecting corridors exist between suitable habitats to facilitate bison movement and distribution to increase resilience to stressors, adaptability to changing conditions, and contributing to stable and increasing genetic diversity.[rdquo] (2020 LMP, Emphasis added).

Though this is a commendable DC at first glance, the language in the last sentence has been weakened (see underlined) from the previous version (in the DEIS) that we supported and should be strengthened. Specifically, the last sentence in the previous version of FW-DC-WLBI-02 read: [ldquo]Adequate connecting corridors exist between suitable habitats to facilitate bison on the landscape with sufficient distribution to be resilient to stressors, adaptable to changing conditions, and contributing to stable or increasing genetic diversity.[rdquo] [ldquo]Sufficient distribution[rdquo] has been removed and the language changed from [ldquo]distribution to be resilient[rdquo] to [ldquo]distribution to increase resilience[rdquo]. This is the difference between contributing towards resiliency versus ensuring a resilient population, the latter being measurable and enforceable language. Simply contributing to resiliency is too vague and does not go far enough to ensure that sufficient bison distribution on the landscape is resilient to stressors, adaptable to changing conditions, and contributing to stable and increasing genetic diversity.

Management Recommendation

[bull] We recommend the forest change the above desired condition to read:

FW-DC-WLBI-02 Suitable habitat supports a year-round bison presence on the Custer Gallatin National Forest. Habitat accommodates bison migrating out of Yellowstone National Park in winter, as well. Adequate connecting corridors exist between suitable habitats to facilitate bison movement and sufficient distribution to be resilient to stressors, adaptable to changing conditions, and contributing to stable or increasing genetic diversity.

Objection 2: Language has been added to the Desired Condition FW-DC-WLBI-04 in the revised

plan that weakens plan direction.

[ldquo]FW-DC-WLBI-04 Bison are present year-round with enough numbers and adequate distribution to support a self-sustaining population on the Custer Gallatin National Forest in conjunction with bison herds in Yellowstone National Park.[rdquo] (2020 LMP, Emphasis added).

The last part (underlined) of the above DC is new language. This significantly weakens this DC by saying that the population is self-sustaining on the forest in conjunction with YNP bison herds rather than a stand-alone year-round bison population on CGNF lands with adequate numbers and distribution to be self-sustaining. Arguably, any year-round bison herd on the Forest regardless of their numbers and distribution could be considered self-sustaining if it is considered part of the herds in Yellowstone National Park. This new language deems the DC meaningless and unenforceable and should be changed back to its original version.

Management Recommendation

[bull] The forest should strive to support one or more year-round self-sustaining bison herds on the Forest and therefore we recommend removing the above added language and restoring it to the original version to read:

FW-DC-WLBI-04 Bison are present year-round with enough numbers and adequate distribution to support a self-sustaining population on the Custer Gallatin National Forest.

Objection 3: The single bison objective (FW-OBJ-WLBI-01) is vague, unclear, and lacks explicit direction facilitating bison expansion into/throughout suitable habitat areas within existing tolerance zones.

[ldquo]FW-OBJ-WLBI-01 Complete three projects within, or for the purpose of creating or connecting, suitable bison habitat every three years, one of which is a habitat improvement project.[rdquo] (2020 LMP).

Objectives must be concise, measurable, and time specific (FSH 1909.12, section 22.13. First, it is unclear what is meant by the other two projects if they are not habitat improvement projects. These [ldquo]projects[rdquo] could be anything, including a project that is detrimental to bison. The intent of the other two projects needs to be clarified, and if they are not bison habitat improvement projects they should be identified as

other projects aimed to benefit bison on the forest in some way, such as conflict reduction work with private landowners, education projects to increase social tolerance, or projects to improve public and tribal hunting efforts. In addition, this objective requires further clarification ensuring that the one habitat improvement project is for the purpose of creating, improving, or connecting habitat for [ldquo]bison[rdquo] explicitly. Also, stating [ldquo]or for the purpose of creating or connecting, [hellip][rdquo] only makes it an option to create bison habitat rather than a requirement, which is measurable and time specific. Both the type of projects and their intent should be specified, and the habitat improvement project must be clearly defined as a [ldquo]bison[rdquo] habitat improvement project. In other words, as written, this objection does not actually meet what we had hoped was the Forest[rsquo]s intent (complete a bison habitat improvement project every three years) nor is it enforceable.

The Forest should also include a guideline (or additional objective) to identify and manage for corridor/migration route areas for bison migrating from the Park to the Forest to facilitate dispersal throughout new and existing tolerance areas. Specifically, routes to the Taylor Fork and Upper Gallatin tolerance area should be identified in the forest plan, and habitat improvement projects implemented to provide a contiguous pathway of suitable habitat to facilitate the restoration of native bison to this area.

Management Recommendation

[bull] The new forest plan should include actionable direction that specifically promotes bison dispersal into, connectivity between, and broad distribution throughout suitable habitat areas within tolerance zones. Again, facilitating dispersal and restoring connectivity throughout tolerance areas is the necessary ecological condition that the Forest should provide to contribute to bison viability. We ask that the objective language be changed to read:

FW-OBJ-WLBI-01 Complete three projects supporting bison use on the Forest every three years, one of which is a bison habitat improvement project for the purpose of creating, improving, or connecting

suitable bison habitat.

[bull] The Forest should also add the following guideline:

The Forest Service will work with state, federal, tribal, and NGO partners to identify, and manage for, suitable habitat and potential corridor areas linking suitable habitat to facilitate bison dispersal into and throughout tolerance areas and to help guide habitat improvement projects under FW-OBJ-WLBI-01.

Objection 4: New and existing language in Guideline FW-GDL-WLBI-03 is confusing and inappropriate.

[ldquo]FW-GDL-WLBI-03 To facilitate bison expansion into unoccupied, suitable habitat in the area that coincides with the grizzly bear primary conservation area, management actions should not create a barrier to bison movement unless needed to achieve interagency targets for bison population size and distribution.[rdquo] (2020 LMP, Emphasis added).

The above (underlined) grizzly bear PCA language is new and is both unnecessarily confusing and potentially concerning. What is the Forest[rsquo]s intention behind including this added language? First, the Forest should not tie bison expansion to grizzly bear recovery/policy. These two species have independent management plans and different biological and social issues concerning their viability. Second, locations that have suitable bison habitat and an interest in seeing bison restored, such as the Dome Mt. Ranch/WMA area and other state sections, fall well outside of the PCA. Furthermore, as mentioned in our DEIS comments, the last portion of this guideline is also problematic. Because IBMP population objectives and tolerance zones are subject to change over time and are currently based on an outdated and unacceptable plan, we believe it is inappropriate for the Forest to include plan direction that could in any way restrict bison use of the landscape, impede connectivity, or affect population abundance. The Forest has an obligation outside of the IBMP to support a viable population of wild bison on Forest System lands and to contribute to the broader restoration of this species as a whole.

Management Recommendation

[bull] As previously suggested, a more straightforward and appropriate guideline would be:

[ldquo]To facilitate bison expansion into unoccupied, suitable habitat within current tolerance areas, management actions should not impede bison movement.[rdquo]

Objection 5: The Forest Service did not include our previously suggested guideline.

The Forest ignored our previous suggestion to include a guideline to 1). Allow for the phase-out of grazing allotments if there are willing permittee(s) both within and adjacent to current tolerance areas, 2). Consider the acquisition of private lands/conservation easement opportunities as those opportunities arise, and 3). Collaborate with other agencies to facilitate safe highway crossings for bison (and other wildlife). Specifically, the voluntary phase-out of grazing allotments to the northwest and west of the Park both within and outside tolerance areas could have significant benefits to bison restoration on Forest lands including the potential to adjust current tolerance zones to allow for bison dispersal into new areas of the Forest, including areas where they are currently allowed but have no way to access given current tolerance boundaries and existing conflicts with cattle.

Management Recommendation

[bull] We ask that the Forest reconsider including the above guideline as a critical part of facilitating bison dispersal into currently unoccupied suitable habitat on the Forest.

Objection 6: The monitoring question and implementation indicators are inadequate to measure progress toward achieving the desired conditions and goals of the new plan.

[ldquo]The FEIS monitoring question (MON-WL-07) is: What management actions have occurred to improve / facilitate bison movements and avoidance of human/bison conflicts?[rdquo] (2020 LMP)

The new Forest Plan should include direction that specifically promotes bison dispersal and distribution throughout suitable habitat areas within tolerance zones. The required 2012 Planning Rule Monitoring Plan should reflect this as well. By simply asking what management actions have occurred [ldquo]to facilitate bison movements[rdquo] is vague and unmeasurable. Movements to where and for what purpose? The monitoring language should be explicit to reflect these goals and desired conditions.

Management Recommendations

[bull] As we previously asked in our DEIS comments, we ask again that the Forest amend the monitoring question MON-WL-07 to read:

[ldquo]What management actions have occurred to improve/facilitate bison use of and broad distribution throughout new and existing tolerance areas?[rdquo]

[bull] Under the Implementation indicators (page 195, 2020 Land Management Plan), we asked and do so again here, that the first Bison management action be amended to read:

[ldquo]# and types, locations of actions that improve or facilitate opening corridors for bison movement and use of unoccupied suitable habitat.[rdquo]

Wild and Scenic River Eligibility

Objection 1: The Custer Gallatin National Forest did not entirely acknowledge and use its own definition of the Fisheries ORV regarding habitat on the national forest. Based on the agency[rsquo]s Fisheries ORV habitat definition, the Shields River, Mill Creek and Buffalo Creek should be eligible Wild and Scenic Rivers.

Appendix E from the 2020 Forest Land Management Plan defines the Fisheries ORV regarding habitat as:

[ldquo]Habitat: The river provides uniquely diverse and/or high quality habitat for native aboriginal population (s) or assemblage (s) compared to the region of comparison.

[bull] The habitat represents a pristine ecosystem relative to others in the region of comparison.

[bull] The habitat supports native aboriginal populations or assemblages of native fish with high conservation value.

[bull] Habitat is secure from invasion of non-native species.[rdquo]

Based on this definition, streams that have been identified by Montana Fish Wildlife and Parks and the Custer Gallatin National Forest for high-priority native fish conservation because of their existing habitat, and because of their high conservation value should be eligible Wild and Scenic Rivers. What[rsquo]s more, in three cases described below, these recommended eligible streams have existing projects in process to secure that habitat from non-native fish species for native fish population strongholds using augmented natural barriers or human-constructed barriers and chemical treatment. Three examples

include: Buffalo Creek, Mill Creek, and the upper Shields River.

Shields River and tributaries

A conversation with Custer Gallatin National Forest Ecologist, Jake Chaffin (phone call with Charles Wolf Drimal, 7/15/2020), reemphasized the importance of the Shields River and its tributaries for native fish conservation. The Forest Service and Montana Fish Wildlife and Parks have partnered on a ten-year project on the upper Shields River to create a 35-mile stronghold for Yellowstone cutthroat trout. This has included a barrier and eight aquatic organism passages so far, with four more to complete. The aquatic habitat and the Yellowstone cutthroat trout population secured above the barrier should qualify as [ldquo]outstandingly remarkable.[rdquo]

Management Recommendation

[bull] The miles of current and near-future secure native fish habitat of the Shields River system should be considered eligible Wild and Scenic Rivers based on the Forest Service[rsquo]s own definition of the Fisheries habitat ORV: [ldquo]The habitat supports native aboriginal populations or assemblages of native fish with high conservation value.[rdquo]

Mill Creek and tributaries

Based on a conversation with Custer Gallatin National Forest Ecologist, Jake Chaffin (phone call with Charles Wolf Drimal, 7/15/2020), GYC staff learned Mill Creek and its tributaries are the Forest Service[rsquo]s most immediate and pressing conservation opportunity for securing a Yellowstone cutthroat trout stronghold population from non-native rainbow trout. Although an old barrier installed near the Forest Service boundary has not fully prevented all rainbow trout from upstream travel, a new barrier near the confluence with Passage Creek, intended to be installed in 2021, will protect 17-27 miles from invasion of non-native species.

Management Recommendation

[bull] Because the habitat value is so high for native Yellowstone cutthroat trout conservation, we urge the Forest Service to recognize the Fisheries ORV related to habitat for Mill Creek and its upper

tributaries. The miles of current and near-future secure river miles should be considered eligible Wild and Scenic Rivers based on the Forest Service[rsquo]s own definition of the Fisheries habitat ORV: [ldquo]The habitat supports native aboriginal populations or assemblages of native fish with high conservation value.[rdquo] [ldquo]The habitat represents a pristine ecosystem relative to others in the region of comparison.[rdquo]

Buffalo Creek

Based on a conversation with Custer Gallatin National Forest Ecologist, Jake Chaffin (phone call with Charles Wolf Drimal, 7/15/2020), GYC staff learned Buffalo Creek and its tributaries are the Forest Service[rsquo]s strongest conservation interest in the Yellowstone Headwaters region for securing a Yellowstone cutthroat trout stronghold population from non-native rainbow trout. This project also has the support of Montana Fish Wildlife and Parks and the National Park Service. Yellowstone National Park is supportive because of the risk of non-native rainbow trout contaminating the genetic makeup of the Lamar watershed. Buffalo Creek flows into Slough Creek, an eligible Wild and Scenic River because of its habitat and population of secure native Yellowstone cutthroat trout. Once complete, the project will secure over 40 miles of stream for native fish. Like Slough Creek and Mill Creek, Buffalo Creek offers excellent habitat for the full life-cycle of Yellowstone cutthroat trout.

Management Recommendation

[bull] Buffalo Creek should be considered an eligible Wild and Scenic River based on the Forest Service[rsquo]s own definition of the Fisheries habitat ORV: [ldquo]The habitat supports native aboriginal populations or assemblages of native fish with high conservation value.[rdquo] [ldquo]The habitat represents a pristine ecosystem relative to others in the region of comparison.[rdquo]

Objection 2: In the agency[rsquo]s [ldquo]Appendix F Responses to Comments on the Draft Environmental Impact Statement,[rdquo] the Forest Service arbitrarily dismissed the Wildlife ORV on deserving eligible streams without acknowledging the science around ungulate migrations, best secure grizzly bear habitat, and best riparian habitat for moose. Not all wildlife habitat is created equal.

The Forest Service writes: [ldquo]The fact that any mammals, such as moose, beaver, river otter, or grizzly

bear at times use rivers and floodplain habitats is not an outstandingly remarkable value, but a part of their normal habitat. These examples did not meet the outstandingly remarkable value definition used for wildlife.[rdquo] (Appendix F Responses to Comments on the Draft Environmental Impact Statement, p.132)

The Greater Yellowstone Coalition[rsquo]s Report on Recommended Eligible Wild and Scenic Rivers on the Custer Gallatin National Forest made a strong case that not all wildlife habitat is created equal, and that based on scientific data and scientific modeling, it is clear that iconic species like elk, moose, and grizzly bear are prone to use particular, high quality habitat, and habitat that provides a critical link during the animal[rsquo]s annual cycles. The aforementioned GYC Report explains this in several ways on such streams as Taylor Creek and its tributaries, and Hellroaring Creek and its tributaries.

Taylor Creek (aka Taylor Fork)

Based on field data from the Wildlife Conservation Society, the Taylor Creek offers one of two moose migrations of conservation interest on the western side of the entire Custer Gallatin National Forest (the other moose migration is on the Madison River.

The Forest Service defines the Wildlife ORV for Habitat as: [ldquo]The river, or area within the river corridor, provides uniquely diverse or high quality habitat for wildlife of national or regional significance, and/or may provide unique habitat or a critical link in habitat conditions for Federal or State-listed or candidate threatened or endangered species, or species of conservation concern. Contiguous habitat conditions are such that the biological needs of the species are met, particularly where such habitats meet the year-round or important seasonal biological needs of the species.[rdquo]

The Greater Yellowstone Coalition finds that important wildlife migrations clearly linked to riparian habitat fit the agency[rsquo]s Wildlife ORV definition for habitat. This is not generic habitat that exists anywhere and everywhere on the forest. This is not just [ldquo]normal habitat.[rdquo] This is outstandingly remarkable habitat. The above map not only exemplifies the outstandingly remarkable wildlife habitat for moose on the Taylor Creek, it also shows the direct relation of the Taylor Creek and its headwaters (Alp Creek and Lightening Creek) to an elk migration of national significance that moves back and forth

from Yellowstone National Park, into the Taylor Creek watershed, and over into the Madison Valley where it winters. The habitat of these river corridors provides essential security for elk movement and is related to the river system. Again, this is not just [ldquo]normal habitat.[rdquo] This is outstandingly remarkable.

The Craighead Institute also makes a case that not all habitat on the Custer Gallatin National Forest, or in other parts of the Greater Yellowstone Ecosystem, is created equal for grizzly bears. The Craighead Institute[rsquo]s modeling on best available core value habitat for grizzly bears shows that some of the best habitat on the national forest extends from the confluence of the Taylor Creek and the Gallatin River up to the headwaters of Taylor Creek, Alp Creek and Lightening Creek. This high-quality habitat follows the river corridors. In the words of the agency[rsquo]s wildlife ORV definition, Taylor Creek [ldquo]provides uniquely diverse or high quality habitat for wildlife of national or regional significance [grizzly bear], and/or may provide unique habitat or a critical link in habitat conditions for Federal or State-listed or candidate threatened or endangered species [grizzly bear], or species of conservation concern.[rdquo] One of the outstandingly remarkable values of the Taylor Creek watershed is that it offers incredibly diverse habitat [ndash] from sage brush to willow wetlands to montane forest to alpine lakes [ndash] in a short distance. The grizzly bear is a threatened species under the Endangered Species Act and is also a species of regional and national significance. The well-being of the species is dependent upon protecting high quality riparian habitat like the Taylor Creek.

One of the region[rsquo]s veteran specialists on grizzly bear conservation couldn[rsquo]t agree more. Chuck Schwartz, who oversaw the Yellowstone Interagency Grizzly Bear Study Team during the important Taylor Fork-Gallatin Land Exchange in the early 2000s, is on record saying:

"The Taylor Fork has the highest density of bears in the northern half of the greater Yellowstone ecosystem," Schwartz says. With plenty of elk calves, rodents, and a wide variety of native plants to eat, some grizzly bear sows have given birth to as many as four cubs in a litter, twice the usual number. "It's not just incredibly productive for grizzly bears," Schwartz says, "the Taylor Fork is a rich piece of real estate for a whole array of species." (https://www.tpl.org/magazine/make-waywildlife%

E2%80%94landpeople)

Kurt Alt, the former Montana Fish Wildlife and Parks regional wildlife manager, also explained, "The Taylor Fork is one of the most precious wildlife areas in the entire Yellowstone area." "Losing it [to development] would have been tragic. Saving it was a close call." (https://www.tpl.org/magazine/makeway-wildlife%E2%80%94landpeople)

On a Greater Yellowstone Coalition field visit to Taylor Creek that involved packrafting the creek from the Taylor Creek trailhead to the entrance of the canyon section about one mile from the Gallatin River confluence, GYC[rsquo]s waters conservation coordinator, Charles Wolf Drimal and Montana conservation associate, Ryan Cruz documented a male Harlequin duck sitting on a rock in the river corridor about a half mile from their take-out. A Harlequin duck sighting for many birder watchers is considered a life accomplishment because these birds are rare and elusive. The Custer Gallatin National Forest[rsquo]s Appendix C Species of Conservation Concern Plan Components, Sensitive Species List pg. 192 lists the Harlequin duck as a sensitive species linked to [ldquo]unique habitats: aquatic and riparian.[rdquo]

The Harlequin duck sighting on June 4, 2020, combined with essential moose and elk migratory habitat, and high value core grizzly bear habitat, adds to the justification of a wildlife outstandingly remarkable value of the entire Taylor Creek watershed.

Management Recommendation

[bull] Taylor Creek and its tributaries, Alp Creek and Lightening Creek, should be eligible Wild and Scenic Rivers with a Wildlife ORV.

Hellroaring Creek

With its relatively low elevation valley compared to sub-alpine drainages to the east, Hellroaring Creek supports an abundance of wildlife species including elk, moose, mule deer, grizzly bear and wolverine. Based on Wildlife Conservation Society data and tracking, a prominent mule deer migration follows Hellroaring Creek for miles up to its headwaters before crossing over into the Mill Creek drainage. While the Custer Gallatin National Forest[rsquo]s argues that [ldquo]this is part of their normal habitat[rdquo], it is clear that

places like Hellroaring Creek that draw a very defined ungulate migration that is not dispersed, do so because of habitat security afforded by the riparian vegetation. Without the presence of the creek, the habitat would not be there, and the mule deer population would not be attracted to it. Let[rsquo]s face it, there are mule deer in many parts of the national forest, but there are only select places like Hellroaring Creek where the mule deer consistently use a migratory route, year after year. The Greater Yellowstone Coalition finds Hellroaring Creek to be outstandingly remarkable for its wildlife habitat.

Management Recommendation

Hellroaring Creek should be an eligible Wild and Scenic River with a Wildlife ORV.

Objection 3: The Forest Service fails to recognize the unique scenic beauty of Taylor Creek.

Taylor Creek deserves a Scenery ORV.

The Custer Gallatin National Forest[rsquo]s response to comments from the public about additional rivers listed with a scenic ORV is ambiguous and insufficient. The Appendix H Response to Comments says: [ldquo]No additional rivers were found eligible after public comments were reviewed. Scenery was proposed as an outstandingly remarkable value for a long list of rivers that should be added to the list of eligible rivers. All comments and provided information was reviewed by the specialist based on the definition used.[rdquo] (pg. 131)

The Taylor Creek is remarkable and unique for its scenery alone. Nowhere else on the Custer Gallatin National Forest can you drive up an undeveloped valley for twelve miles and see only one guest ranch inholding surrounded by an open sage brush and grassland valley, and healthy willow stands leading up to alpine peaks capped with snow for most of the year. A couple of the scenery ORV definitions of the forest service refers to: Rock, land and water forms: Visually striking cliffs, canyons; Visually strong and easily discernible examples of geologic forms and processes; visually distinctive strata layers or differential erosion (Appendix E Forest Land Management Plan 2020 pg. 240). In entering the Taylor Creek watershed a visitor drives over a terminal moraine from an ancient glacier. Then, while on top of the moraine, that visitor can park and look down at the steep river canyon of the Taylor Creek to the north where only three years ago a giant rock formation collapsed from a canyon wall into the river and

has now created a brilliant waterfall in the middle of the canyon with a beautiful, placid pool behind the rock obstruction. While packrafting the Taylor Creek during its short runoff period in late May or early June, one finds a combination of massive meandering Class I waters followed by swift continuous splashy Class II for miles. And right before the entry into the Class II section, the creek splits in an open meadow north of the road and forms a 30-meter-wide waterfall that pours back on to itself. Hiking up the trail to the headwaters of Taylor Creek, one encounters massive alpine peaks with lakes strewn in the high country, only miles from an undeveloped, open sage valley below. For the Custer Gallatin National Forest, the Taylor Creek has outstandingly remarkable scenery.

Management Recommendation

[bull] Taylor Creek should be an eligible Wild and Scenic River with a Scenery ORV.

Objection 4: The Forest Service failed to acknowledge the [ldquo]unique, exemplary and rare[rdquo] recreational opportunities of Taylor Creek.

In Appendix E of the Custer Gallatin National Forest Proposed Action[mdash]Revised Forest Plan, the Forest Service explains that the Recreation ORV can include:

[ldquo]Unique/outstanding/exemplary recreation opportunities such as premier fishing, renowned rapids, or nationally designated trails related to the river corridor.

River-related recreation opportunities: such as rivers or corridors used for premier whitewater opportunities or destination ice climbing.[rdquo] (pg.8)

The Taylor Fork of the Gallatin River provides a unique Class II whitewater packrafting opportunity that cannot be found anywhere else on the Custer Gallatin National Forest. The experience is only available during two to three weeks of the year. This usually occurs during peak flows in May to early June when the run-off from snowmelt is highest. Putting in at the upper bridge by the Taylor Creek trailhead, one first encounters swift Class I+ paddling with lots of woody debris and braided channels to navigate. The river cuts through willow and patches of conifer forest. The paddle typically requires portages around log jams and some quick maneuvers to avoid obstacles. Meanwhile, the views of the upper Taylor Fork[rsquo]s

alpine peaks of the Madison Range, laced with meandering chutes, couloirs, and steep faces are world class. After crossing under the first bridge, the Taylor Creek then opens into a slower, broad and meandering plain with sage brush above the banks and views of a wider, lower elevation grassland valley. This mile or two of river includes a spectacular 30-meter wide waterfall that is formed by the creek splitting in two sections, and one of the braids then flowing back onto the main channel as a short, albeit wide waterfall. From here, the channel straightens and the current turns into continuous Class II splashy whitewater for several miles. These two sections combine for a fantastic entry level whitewater creek for packrafting. As the creek carves through an ancient terminal moraine in the last mile of the stream before the Gallatin River confluence, the Taylor Fork runs through an even narrower canyon section with a 10-15-foot waterfall that was recently created by a landslide a few years ago.

The quality of this recreation experience is hands down, world class. It is also outstanding, unique and exemplary on the Custer Gallatin National Forest. There is no place like it. And to add to the allure, like powder skiing or high-quality ice climbing, the flows required for paddling are only available for a limited time. It is important for the Forest Service to recognize the quality of this experience. The agency has placed its attention on the Recreation ORV where the quantity of recreation use is high. Examples include Hyalite Creek, one of the most popular recreation zones in Montana, and Pine Creek, one of the most popular hikes in Park County due to the waterfall and alpine lake. It is our interest to recognize and protect the quality of the recreation experience on the Taylor Creek. It is worthy of a Recreation ORV and Wild and Scenic Rivers eligibility status.

Management Recommendation

Taylor Creek should be an eligible Wild and Scenic River with a Recreation ORV.

Packrafting Taylor Creek June 7, 2020. Photo by Ryan Cruz. Greater Yellowstone Coalition

Additional Recommended Wilderness Areas

Objection 1: The 2020 Land Management Plan removes Recommended Wilderness status for Lionhead despite its existing wilderness character.

The omission of Lionhead from Alternative F[rsquo]s wilderness recommendations is deeply upsetting. As

stated in the DROD (p. 16), the Lionhead area [ldquo]been managed under the 1987 Gallatin plan as a recommended wilderness area for more than 30 years.[rdquo] However, during this time, mountain bikes have been allowed to use 18 miles of trails that access the core of the area. While the DROD acknowledges that the area is [ldquo]highly valued by wilderness advocates and enthusiasts [hellip] of quiet recreation[rdquo] and is [ldquo]not heavily used[rdquo] by mountain bikes, the Forest Service nonetheless chooses to drop its longstanding wilderness recommendation for Lionhead.

The DROD states that a Backcountry designation in Lionhead [ldquo]will protect the current character of the area[rdquo] and that existing uses (mountain biking) will [ldquo]continue as long as they do not degrade the character of the area[rdquo] (DROD p16). This second statement seems to refer to adaptive management, implying that uses would be disallowed should they degrade Lionhead[rsquo]s wilderness character. Yet we find no monitoring questions to detect this possible degradation nor plan components to substantiate this promise of adaptive management in the 2020 Land Management Plan. The only monitoring of recreational [ldquo]travel incursions[rdquo] will focus on motorized travel (MON-REC-02) and signage near designated wilderness and RWAs (MON-REC-02), not mountain biking in Backcountry Areas (LMP p. 200).

Aside from the possibility of mechanized uses degrading the area[rsquo]s wilderness character replacing the Lionhead RWA with a backcountry designation is problematic for several additional reasons. First, it would allow for timber harvest without plan components to protect the secure grizzly and wolverine habitat found there. It also sets a bad precedent for other areas in the forest, sending the message that, when non-wilderness uses take place in areas meant to be managed for potential entry into wilderness system, the area[rsquo]s chances of wilderness designation are all but eliminated regardless of its wilderness character. If the presence of non-wilderness uses effectively revokes an areas wilderness eligibility, then the allowance of those uses arguably circumvents the proper regulatory process for RWA status removal.

GYC has healthy partnerships with the mountain biking community in and around West Yellowstone,

including with the local shop Freeheel and Wheel, and we understand the significance of the rides that pass through Lionhead. That is why we have urged the Forest Service in our previous comments to opt for the designation suggested in the Proposed Action, which essentially combines the boundaries of Alternative B with Alternative C[rsquo]s language to disallow mechanized uses in RWAs. The Lionhead RWA boundary would recede northward to allow continued access for mechanized recreation along the Continental Divide Trail and Mile Creek trails and eliminating mechanized access along Sheep Lake/Creek trail to the north. This compromise would ensure continued mountain biking opportunities on arguably the more widely used of the two trails in question while maintaining the RWA and setting a more positive precedent for other RWAs in the landscape. Other groups including The Wilderness Society support this decision as well.

Management Recommendations:

[bull] Maintain the Lionhead RWA as recommended by the Proposed Action, combining the boundaries of Alternative B with Alternative C[rsquo]s component to not allow non-conforming uses in recommended wilderness.

Objection 2: The 2020 Land management Plan fails to designate the Dome Mountain or Chico-Emigrant Recommended Wilderness Areas as proposed by Outdoor Alliance Montana without clear reason.

In our public comments on the Draft Revised Forest Plan and DEIS, GYC voiced support for recommended wilderness in the Chico Peak, Dome Mountain, and Emigrant Peak roadless areas as mapped by Outdoor Alliance Montana. This recommendation was a slightly modified version of Alternative D.

These areas offer world-class recreation opportunities including hunting and backcountry skiing, yet they are only a 30-minute drive from Livingston. As a result, recreational use here has grown significantly in the past decade, particularly in the Emigrant Gulch area, and will likely continue to do so. Chico, Dome, and Emigrant also provide high quality habitat for wildlife including wolverine, elk, and

grizzly, and all three species have been regularly observed in these roadless areas. We therefor believe that this area presents a valuable addition to the Absaroka-Beartooth Wilderness.

Unfortunately, we find no response to this request in the FEIS response to comments, aside from a general discussion of recommended wilderness forest wide. We are therefore unclear why the Forest Service chose not to recommend this specific area for wilderness.

Management Recommendations:

[bull] Include the Chico Peak, Emigrant Peak, and Dome Mountain Recommended Wilderness Areas as defined and called for by Outdoor Alliance Montana.

Closing Remarks

Thank you for considering our objections. The Custer Gallatin National Forest[rsquo]s revised forest plan is critical to support the health of Greater Yellowstone[rsquo]s northern edge and rest of the ecosystem it is connected to. The Greater Yellowstone Coalition and our supporters thank you for the opportunity to participate in this process and we look forward to working through objection resolution meetings as an interested party. Climate change, growing recreational demand, conflicting user needs and more present new challenges to the forest every day. Through a robust planning process, the Custer Gallatin can be well equipped to tackle these issues.

GYC staff Ryan Cruz, Darcie Warden, Brooke Shifrin, Shana Drimal, Charles Drimal, and Joe Josephson contributed to this document. These objections will be submitted both electronically through the CGNF online portal, as well as physically at the Bozeman office. Our physical submission will also include objections from GYC[rsquo]s supporters that have standing.

GYC supports the Custer Gallatin National Forest in the pursuit of a healthy, resilient landscape. Please reach out to us with any questions regarding our objections or recommendations.

Sincerely,

Darcie Warden

Montana Conservation Coordinator

Greater Yellowstone Coalition

Ryan Cruz

Montana Conservation Organizer

Greater Yellowstone Coalition