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September 8, 2020

Re: Objections to the Custer Gallatin National Forest 2020 Land Management, Draft Record of Decision, and Final Environmental Impact Statement

Carbon County Resource Council (CCRC) submits the following objections in regard to the Custer Gallatin National Forest 2020 Land Management Plan (2020 Forest Plan), Draft Record of Decision (DROD) and Final Environmental Impact Statement (FEIS) on behalf of its members.

Carbon County Resource Council is a group of concerned citizens advocating responsible use of resources and finding solutions to problems that affect our unique quality of life. We mobilize citizens to take action on critical issues facing our community and actively participate in the public process.

Carbon County Resource Council believes that clean air, clean water, and healthy ecosystems are of vital importance to the sustainable outdoor recreation and agricultural economies in Carbon County.

Carbon County Resource Council commends the Forest Service Revision Plan Team on their robust analysis of the challenges facing the Custer Gallatin National Forest and is in agreement with much of the direction of the 2020 Forest Plan.

CCRC has participated in the Custer Gallatin Forest Plan planning process by attending public meetings and responding to the 2018 Proposed Plan (February 21, 2018) and 2019 Draft Environmental Impact Statement and Draft Custer Gallatin Forest Plan (June 5, 2019). CCRC's comments related to concerns of the effects of a changing climate, population growth, changing demographics and economics, increased outdoor recreation, energy and mineral development and other management activities on ecosystem processes and functions, soils health, water quality, wildlife habitat and outdoor recreation related infrastructure. With these concerns in mind, CCRC reviewed specific sections of the draft and final plan documents related to Soils, Watershed Aquatics and Riparian Ecosystems, Energy Minerals and Geologic Areas of Interest, Timber Management, and Recreation Settings, Opportunities and Access.

CCRC's Response to Draft EIS and Forest Plan- June 5, 2019

CCRC recommended and supported the selection of Alternative D, which emphasized maintaining the resiliency of natural systems and ecological restoration, as being most responsive to the changed and changing social/economic and ecological conditions within and outside the Forest. CCRC felt Alternative D would:

- * Respond to the effects of a changing climate that is already 2[deg] F warmer and continues to warm over the life of the Forest Plan (2017 Montana Climate Assessment);
- * Respond to increased demands for open space and outdoor recreation opportunities;
- * Respond to increased resource use stressing wildlife habitat, roads, trails, campgrounds, and dispersed camp sites;
- * Establish additional wilderness and backcountry areas, protecting large intact landscapes, maintaining habitat connectivity, and reducing soil disturbance from motorized and mechanized uses;
- * Designate recreation use areas and;
- * Put less of an emphasis on resource extraction as Montana's economy shifts from a commodity production focus to tourism and outdoor recreation, now the state's second largest economic sector (Headwaters Economics).

Additionally CCRC supported the expanded discussion about the importance of soil to land productivity and ecosystem functions, particularly related to forested ecosystems. CCRC also supported reduced miles of roads and trails suitable for motorized and mechanized use. CCRC recommended some improvements to Alternative D such as:

- * A higher emphasis on conservation and restoration of wildlife habitat and plant communities beyond the species highlighted. Given the amount of grassland and shrubland ecosystems on the Forest, this includes specifically addressing declining grassland and shrub land dependent bird populations and focusing on opportunities to offset habitat loss on private lands due to land use changes and/or climate change.
- * Including guidelines and standards for soil health beyond forested lands and effects of timber harvest to grasslands and shrublands and effects to rangeland health.
- * Including a standard to establish baseline information on surface and groundwater quality and quantity prior to permitting new mineral or energy development activity.
- * Recognizing the value of targeted grazing for managing vegetation, particularly to control invasive plant species.
- * Emphasizing importance of other resources, particularly wildlife habitat in determining lands suitable for timber production.
- * Raising concerns of the increased use off highway vehicles (OHVs) and impacts on plant, wildlife, soil health, watershed quality, road and trail infrastructure and ability of users to follow posted trail guidelines and rules.

With these previous comments and suggestions in mind, CCRC reviewed the Final 2020 Land Management Plan and associated documents for the Custer Gallatin National Forest. In general, CCRC found many of the concerns and issues are addressed in the Final Land Management Plan in various sections and plan components. However, CCRC feels there is still room for improvement.

Soils (SOIL)

June 5, 2019 [ndash] CCRC Response to Draft EIS and Forest Plan

The Draft EIS and Draft Land Management Plan for the Custer Gallatin National Forest, Soils Section, Introduction (Draft Plan, Ch. 2.3.3, Soils) contained the following statements:

[ldquo]Soils support terrestrial life by providing nutrients for plant growth through their ability to allow air and water to enter through the soil surface and circulate down through the soil profile, the ability to store water for subsequent plant use while also allowing for the drainage of excess water, the ability to buffer soil pH and detoxify contaminants, ability to limit both wind or water erosion, and the ability to support beneficial soil micro-organism populations as well as macro- and micro-invertebrates. All of the above are soil functions critical to sustaining the ability of national forest lands to provide desired goods and services for the public.[rdquo]

Each soil has its own inherent capacity to produce desired goods and services as well as inherent susceptibilities to degradation from different types of soil disturbance. Given the extensive land management practiced on national forests, opportunities are rare on Forest Service lands to increase soil productivity beyond the inherent capacity of local soil resources. Thus, inherent productivity of the soil plays a critical role in how these lands can and should be managed.

CCRC is actively involved, alongside its parent organization Northern Plains Resource Council, in working with agricultural groups and others in promoting soil health restoration and maintenance. The CCRC letter dated to February 21, 2018 had requested a more robust discussion about the importance of soils and commented CCRC agrees with the draft Plan describing the importance of soils to land productivity and ecosystem functions. CCRC[rsquo]s review of the Final 2020 Land Management Plan found the above paragraphs removed. CCRC believes the paragraphs should be restored to Chapter 2, Soils, Introduction. The paragraphs describe and communicate to the public as well as internally to the Forest Service the importance of soil as an essential component of a functioning ecosystem. CCRC believes land management plans are as much a public document as an agency document informing the public about important ecosystem components, functions and rational guiding land management.

CCRC, in comments dated to February 21, 2018, suggested a more robust discussion of soil quality and soil health. Also removed from the Soils Introduction was a paragraph describing soil quality and its use as a measure for maintaining soil productivity. The Final EIS for the 2020 Land Management Plan, Volume 4, Appendix F: Response to Comments, Soils, page 96 describes soil quality as synonymous with soil health as

defined by the Natural Resources Conservation Service. Since the FS uses soil quality, while Natural Resources Conservation Service, Bureau of Land Management and others more commonly use the term [ldquo]soil health[rdquo], CCRC suggests the following be included in the introduction:

The Forest Service Soil uses soil quality standards to describe and monitoring effects of management activities on soil productivity. Soil quality is synonymous with soil health as used by the Natural Resources Conservation Service which defines soil health as the continued capacity of soil to function as a vital living ecosystem that sustains plants, animals, and humans.

Desired Conditions (FW-DC-SOIL)

In its June 5, 2019 letter, CCRC agreed with the desired conditions stated in the Draft Land Management Plan which included the following statement that has since been removed:

* 02 Areas of highly erodible soils or land types with high mass failure potential are not destabilized.

Soil and land stability are important to continued soil productivity and water quality. CCRC believes areas of highly erodible soils or land types with high mass failure potential should not be destabilized by management activities. The statement should be re-inserted.

CCRC agrees with inclusion of more specific desired conditions for woody debris in different forest environments. Missing, however, is recognizing the importance of rangeland soils to the long term productivity and sustainability of grassland and shrubland ecosystems. Grasslands and shrublands (rangelands) make up a significant component of the Custer Gallatin land base. In grasslands with healthy root systems, the majority of biotic production occurs below ground. Healthy grassland soils have the potential of playing an important role of capturing and sequestering carbon in soil organic matter. A large portion of grasslands and shrublands is affected by livestock use. Additionally, growing recreation use of dispersed camp sites and mechanized and motorized trails have the potential to compact soils, remove vegetation cover, and destabilize soils. Soil and site stability along with hydrologic function and biotic integrity is an important attribute of rangeland condition and trend (rangeland health) assessments (See Interpreting Indicators of Rangeland Health Version 4, 2005, Technical Ref. 1734-6; Rangeland Health: New Concepts for Assessment of Rangeland Condition, 1995, Journal of Range Management pp. 271-283; New Methods to Classify, Inventory, and Monitor Rangelands, National Research Council, 1994, Soil Stability and Watershed Function pp 98-105).

CCRC would like to see a more affirmative desired condition statement related to grasslands and shrublands such as:

Soil and site stability is an important attribute of a functioning and healthy nonforest (rangeland) ecosystem; organic substrates (vegetative litter and soil organic matter) are present in sufficient amounts to maintain soil and site stability, soil fertility, hydrologic function and ecological functions across nonforest land areas and vegetation types. See (FW-DC-VEGF) for desired condition description of biotic integrity and hydrologic function attributes.

Soils and Grassland, Shrubland, Woodland, Riparian, Alpine and Sparse Vegetation (VEGNF)

The Soils and Grassland, Shrubland, Woodland, Riparian, Alpine and Sparse Vegetation (VEGNF)

section contains statements incorporating soil health and rangeland health attributes and indicators for Xeric Grasslands. For the most part, CCRC supports the desired condition statement for Xeric Grasslands. However, the statement could be strengthened and should be included for Mesic Grasslands and Xeric Shrublands. Suggested edits to FW-DC-VEGNF, table 14 are bolded:

Xeric Grassland, Mesic Grassland, Xeric Shrublands

Vegetation typically has strong and robust root systems that allow production to increase considerably with favorable growing conditions and contribute to the maintenance of soil organic matter and below ground biotic activity. This vegetation type provides for soil stability, a functioning hydrologic cycle and provides for the flow of energy and cycles nutrients and carbon through the ecosystem. Plant litter is a common component and is available for soil building and moisture retention. There is very little movement of plant litter off-site with natural plant mortality typically being low. Biological soil crusts are present in arid areas where plant cover is low and plants are more widely spaced. Bare ground is present because of the warm dry nature of these sites but at low amounts.

Standards (FW-STD-SOIL)

The following standard in the draft Plan is removed in the 2020 Forest Plan.

02 Vegetation management activities in riparian management zones (riparian management zones), both the inner and outer, shall not exceed 12 percent detrimental soil disturbance for pre-existing plus new management-caused detrimental soil disturbance in activity areas within the riparian management zone. If pre-existing detrimental soil disturbance levels already exceed 12 percent detrimental soil disturbance in an activity area within the riparian management zone prior to a management action, then the total mitigation detrimental soil disturbance shall not exceed 12 percent with an expected, long-term trend towards continued improvement.

CCRC believes the statement is important given the sensitivity of riparian and wetland (e.g. springs, seeps) soils to disturbance, particularly livestock grazing, and should be brought back as a standard.

Guidelines (FW-GDL-SOIL)

The 2020 Forest Plan increased the slope limit from 35 percent to 40 percent. Soils on steeper slopes are less stable and more susceptible to gully and rill formation and mass failure when vegetation cover is lost. CCRC would like to know the Forest Service's rationale for increasing the slope limit. CCRC believes the originally 35% limit should be restored.

01 To reduce the potential for rill or gully erosion occurring along equipment tracks, untethered, ground based mechanical equipment should not operate on sustained grades steeper than 35 percent.

Wording was also changed for guideline 02. For the 2020 Forest Plan, CCRC suggests keeping the Draft Plan's emphasis on minimizing topsoil loss and loss of effective rooting depth. For example, top soil should be bladed/stockpiled to the side and available for restoration of temporary road. Blading depth should be tailored to local soil and site conditions. The Draft Plan wording better captured the intent and purpose:

02 New temporary road construction should minimize long-term loss of topsoil material along road prisms, to limit the extent of long-term detrimental soil disturbance created as a result of soil displacement along the temporary road corridor.

CCRC is concerned, as with the desired condition statements, that the soil guidelines center on management and timber harvest related activities in forest ecosystems. The guidelines do not address activities affecting soil quality/soil health for nonforest (rangeland) ecosystems, specifically the effects of livestock grazing, mechanized and motorized use and dispersed campsites (inside and outside wilderness areas) on soil and site stability. CCRC suggests the following additional guidelines:

To maintain soil and site stability, protect long term soil productivity and sustain functioning nonforested (rangeland) ecosystems, soil and site stability evaluations shall be integrated with biotic integrity and hydrologic function attributes for assessing and monitoring rangeland condition and trend. The guideline is applicable for preparation of allotment management plans and monitoring trends in condition for grazing allotments and wildlife use areas outside of grazing allotments.

To maintain soil and site stability and reduce detrimental effects to soil productivity along mechanized or motorized trails or dispersed camp sites, effects on soil compaction, loss of vegetative cover, formation of rills, ruts and gullies will be monitored and appropriate mitigation/restoration measures implemented tailored to the local site and soil conditions.

Watershed and Aquatics (WTR) and Riparian Management Zone (RMZ)

CCRC has focused on preserving water quality and quantity, particularly from impacts caused by mining and oil and gas activity. CCRC worked with the Carbon County Planning Board and the Carbon County Commission to incorporate baseline water testing into the Carbon County Growth Policy. Through these efforts, oil and gas companies are required to complete baseline water testing of groundwater and surface water prior to drilling. As a result of this effort, Carbon County has the most stringent industry regulations in the state of Montana.

CCRC previously commented on impacts to water quality from mining, oil and gas development and livestock grazing (February 21, 2018 and June 5, 2019). Specifically, CCRC's February 21, 2018 response stated "Carbon County Resource Council seeks to ensure that land, water, and air are protected in the face of oil and gas development" and stated the need for baseline water testing. Concerns about water quality, quantity and impacts to riparian areas are addressed under desired conditions, goals, objectives, standards and guidelines outlined the Watershed and Aquatics (WTR) and Riparian Management Zone (RMZ) sections.

However, the 2020 Forest Plan does not address baseline water testing to maintain water quality and quantity. CCRC still requests a Forest-wide Guideline requiring baseline groundwater and surface water testing prior to permitting mining or oil and gas activities as part of the Application for Permit to Drill (APD) or application to permit mining environmental analysis. Suggested wording for a guideline either under Guidelines (FW-GDL-WTR) or Guidelines (FW-GDL-EMIN):

To protect water quality and quantity baseline water testing will be completed as part of the Application Permit to Drill (APD) or mining permit environmental analysis and prior to issuance of the permit.

CCRC is also concerned about a change in wording between the Draft Plan and 2020 Forest Plan that appears to be more permissive of adverse effects generated by placer activities in streams and riparian areas.

Guidelines (FW-GDL-RMZ)

The following guideline that was in the draft Plan is deleted in the 2020 Forest Plan.

[ldquo]01 To reduce the likelihood of sediment input to streams and to reduce adverse effects to stream channels and riparian areas, placer activities (prospecting, exploration, and mining) should be conducted in a manner that precludes sediment input to streams. Processing facilities should be located outside of the inner riparian management zone and have containment provisions that minimize sediment and other by-products inputs to stream courses.[rdquo]

Given the potential impacts to riparian areas, water quality and sediment loads, CCRC believes the deleted guideline should be re-inserted. CCRC is concerned that the Forest Service would consider permitting placer mining activities in streams and rivers at all.

CCRC supports the following three guidelines, addressing concerns about effects of livestock grazing and energy and mineral development in riparian areas, streams, rivers, wetlands, springs, and seeps.

Guidelines (FW-GDL-RMZ)

[ldquo]01 To reduce the likelihood of sediment input to inner riparian management zones and to reduce adverse effects to stream channels and riparian areas, new permanent livestock handling or loading facilities (for example, corrals), livestock handling activities, watering tanks and associated infrastructure, and livestock trailing should be located outside of the riparian management zone unless it can be demonstrated these facilities or handling activities will not affect the riparian area functionality or that such placement improves an existing situation.[rdquo]

Guidelines (FW-GDL-GRAZ)

01 To maintain riparian management zone habitats and water quality, new or revised allotment management plans should incorporate adaptive strategies to reduce sediment delivered to watercourses, reduce degradation

to streambank stability, and protect saturated soils from livestock grazing.

02 The purpose of this guideline is to maintain or improve riparian and aquatic conditions and achieve riparian desired conditions over time through adaptive management. New grazing authorizations and reauthorizations that contain low gradient, alluvial channels should require that end-of-season stubble height be 10 to 15 cm (4 to 6 inches) along the greenline. However, application of the stubble height numeric value range should only be applied where it is appropriate to reflect existing and natural conditions for the specific geo-climatic, hydrologic, and vegetative conditions where it is being applied. Alternative use and disturbance indicators and values, including those in current ESA consultation documents, may be used if they are based on current science and monitoring data and meet the purpose of this guideline. Long-term monitoring and evaluation should be used to adapt this numeric range and/or the use of other indicators.

Guidelines (FW-GDL-EMIN)

02 To protect and conserve aquatic and riparian associated resources (such as streams, rivers, woody draws, wetlands, springs, and seeps) new mining activities should avoid riparian management zones. If the riparian management zone cannot be avoided operators should take all practicable measures to maintain, protect, and rehabilitate water quality and habitat for fish and wildlife, hydrologic function, and other riparian associated resources which may be affected by the operations. Required bonding must consider (in the estimation of bond amount) the cost of stabilizing, rehabilitating, and reclaiming the area of operations.

Forested Vegetation (VEGF)

Desired Conditions (FW-DC-VEGF)

CCRC continues to be concerned with the effects of a changing climate and warming temperatures on forest ecosystems. The 2017 Montana Climate Assessment (Whitlock et al., 2017, 2017 Montana Climate Assessment) reported average temperatures have been trending upward across Montana since 1950. In the South Central Montana Climate Zone (including the Absaroka and Beartooth and Pryor Mountain Geographic Areas), the average annual temperature has increased 0.44[deg] F per decade (2.8[deg] F warmer now than in 1950). Spring and winter temperatures have been trending higher per decade as well (winter minimums are +0.49[deg] F, spring +0.61[deg] F). Summer average maximum temperatures have been warming 0.36[deg] F per decade, resulting in more warm summer days (maximum temperatures exceeding 90[deg] F). The warming trend and changes in growing season conditions are projected to continue.

Evidence is increasing that warming temperatures and severe summer drought are playing a role in unprecedented tree die-off and the ability for forest re-establishment. Forests in many regions around the world have experienced elevated rates of tree mortality and episodes of widespread, regional forest die off due to warming temperatures and increased variability in precipitation (Hammond et. al. 2019, Dead or dying? Quantifying the point of no return from hydraulic failure in drought-induced tree mortality, *New Phytologist* 223: 1834[ndash]1843). Warmer temperatures and declines in soil moisture are affecting tree seedling survival in subalpine and low elevation forests (Hansen and Turner, 2019, Origins of abrupt change? Postfire subalpine conifer regeneration declines nonlinearly with warming and drying; Davis et. al. 2019, wildfires and climate change push low elevation forest across a critical climate threshold for tree regeneration).

Forests within the Beartooth Mountains are already experiencing landscape level change from large fires and beetle caused tree mortality in whitebark pine, limber pine, sub-alpine fir and spruce. Current and projected increases in temperature and corresponding higher probabilities for climate driven landscape level disturbance events (fires, insect outbreaks, drought stress) are likely to continue. Corresponding changes in growing season and soil moisture conditions from less snowpack, early snowmelt and increased length of summer drought will likely affect tree regeneration and seedling survival. Given this, it seems prudent to ask whether the desired conditions achievable under such climatic changes.

Objectives (FW-OBJ-VEGF) describes a minimum of 6,000 to 7,500 acres will be treated with timber harvest, planned ignitions, thinning, planting on average each year. It is conceivable a single landscape level disturbance could exceed the targeted treatment significantly altering existing forest and future forest conditions. Missing in the desired conditions, objectives, and guidelines is an adaptive strategy to deal with a changed climate regime driving landscape level disturbance events and growing season conditions outside the natural range of variation.

Grassland, Shrubland, Woodland, Riparian, Alpine and Sparse Vegetation (VEGNF)

Desired Condition (FW-GDL-VEGNF)

As outlined in comments for the above Soils Section, CCRC recommends edits to table 4 for Xeric Grasslands, Mesic Grassland, and Xeric Shrublands.

Guidelines (FW-GDL-VEGNF)

In earlier comments (February 21, 2018; June 5, 2019), CCRC raised concerns about recreation impacts on habitat and ground disturbance and suggested the Forest Plan should anticipate and mitigate effects of increased use. To that end, CCRC suggests two additional guidelines:

09 To minimize stem damage, soil compaction, or root damage from frequent human use, dispersed recreation sites should be located out of aspen stands, riparian areas and woody draws. They should be monitored and managed to protect or restore vegetation and soil resources.

To maintain or restore grassland and shrubland bird habitats vegetation is managed to provide a heterogeneous landscape of diverse plant communities and vegetation structure.

Carbon Storage and Sequestration (CARB)

CCRC previously commented on the need to address climate change and supports incorporating carbon sequestration in the 2020 Forest Plan. CCRC agrees with the desired condition statement and goal to work with Research Stations, Universities and other organizations to better address and adapt to increasing atmospheric

carbon dioxide and a changing climate. However, CCRC does question a statement in the Introduction:

[Idquo]Harvesting and regenerating forests can also result in net carbon sequestration in wood products and new forest growth[hellip][rdquo]

The statement implies a reliance on traditional timber production and harvest practices and assumes forest regeneration will occur under future climatic conditions. Recently published research suggests forest management to sequester carbon may require different management strategies as future warming and drying may affect forest regeneration. Western US forests are net carbon sinks and forest carbon storage may be more effective in climate mitigation through reduced harvest, longer rotations, or more efficient wood product uses (Hudiburg et.al. 2019, Meeting GHG Reduction Targets Requires Accounting For All Forest Sector Emissions). Carbon sequestration via forest preservation can be a viable climate change mitigation strategy (Buotte et al. 2019, Carbon sequestration and biodiversity co-benefits of preserving forests in the western United States).

Future forest management may require a variety of strategies available to land managers to maintain or enhance forest carbon. Effective management of forests for carbon sequestration necessitates consideration of future climate projections and expected impacts on ecosystems (Ontl et al. 2019, Forest Management for Carbon Sequestration and Climate Adaptation). Studies have found that warmer temperatures and declines in soil moisture affect seedling establishment in subalpine and low elevation forests (Hansen and Turner, 2019, Origins of abrupt change? Postfire subalpine conifer regeneration declines nonlinearly with warming and drying; Davis et. al. 2019, wildfires and climate change push low elevation forest across a critical climate threshold for tree regeneration)

Recognizing the rapidly changing terrain of climate research, CCRC suggests an additional goal or guideline:

As climate adaptation and carbon sequestration research evolves, the Custer Gallatin National Forest adapts forest and rangeland management objectives to emphasize carbon sequestration tailored to forest, grassland and shrubland soil and site capability.

Wildlife (WL)

General Wildlife Plan Components

Native grassland and shrubland bird populations have been declining primarily due to habitat loss (see Kenneth V. Rosenberg and others, 2019, Decline of the North American avifauna, Science 366, 120[ndash]124). As habitat loss continues through changes in land use on private lands, grasslands and shrublands on National Forests can continue to provide habitat and refugia for obligate shrubland and grassland bird species. CCRC suggests placing emphasis on grassland and shrubland bird habitat under desired conditions and guidelines either under Grassland, Shrubland, Woodland, Riparian, Alpine and Sparse Vegetation (VEGNF) or Wildlife (WL). See suggested wording below.

Desired Conditions (FW-DC-WL)

Grassland and shrubland landscape patterns are composed of vegetation communities varying in composition and structure to meet landbird habitat requirements.

Guidelines (FW-GDL-WL)

To maintain or restore grassland and shrubland bird habitats vegetation is managed to provide a heterogeneous landscape of diverse plant communities and vegetation structure.

Permitted Livestock Grazing (GRAZ)

Standards (FW-STD-GRAZ)

CCRC recommends an additional standard for administering and managing grazing allotments:

Grazing allotments will be monitored annually for compliance with allotment management plans, stocking rates and forage utilization standards and periodically monitored for changes in in soil and vegetation condition and trend in key areas.

Timber (TIM)

CCRC is concerned about the percent slope criteria allowing steep slopes up to 80 percent to be identified as suitable for timber production. Appendix B Vegetation and Timber Analysis Process, Table 4, Additional areas eliminated lists as criteria for eliminating lands that may be suitable, Percent Slope > 80% (PCT_SLP_AV >80% from VMap data). Given the high probability of detrimental effects to soil and site stability on the steep and very steep mountain slopes of the Beartooth Mountains, CCRC wonders how steep to very steep mountain slopes (i.e. 50-80%) fit the suitability criteria of (v) [Idquo]Lands not suitable for timber production due to technology or site considerations, where harvest operations may result in either irreversible damage[rdquo] and (vi) [Idquo]Lands where adequate restocking within 5 years is not assured[rdquo] as outlined in See 36 CFR 219.11(a). CCRC believes the upper slope limit determining timber production suitability should be lowered and based on geomorphic, geologic, landtype and soil criteria that informs whether slopes are subject to mass failure or highly erodible.

Recreation Settings, Opportunities and Access

In its June 5, 2019 comments following consideration of outdoor recreation and its potential impacts to wildlife habitat, cultural sites and ground disturbance (often from motorized and mechanized activities), CCRC recommended selection of Alternative D. CCRC[rsquo]s concerns were particularly focused on OHV use impacts to plants, wildlife, soil health and watershed quality. CCRC also expressed concern regarding OHV users[rsquo] disregard for posted guidelines and rules.

In comments dated to February 21, 2018, CCRC commented on increased outdoor recreation use over the 15-30 year duration of the new plan. Values for open space, outdoor recreation opportunities, wildlife habitat and wilderness are likely to supersede demands for commodity production, citing economic reports from Headwaters Economics.

With these comments in mind, CCRC reviewed the General Recreation (REC), Roads and Trails (RT) and Recreation Opportunities[ndash]Dispersed Recreation (RECDISP) sections of the Plan.

General Recreation (REC)

Desired Conditions (FW-DC-REC)

The desired conditions recognized a need to respond to increased recreation activities and adaptation to change. Missing is a statement acknowledging potential impacts to plants, wildlife habitat, soil and watersheds. CCRC recommends an additional desired condition statement:

Recreation use effects on plants, soil quality, wildlife habitat, and watershed condition is recognized and appropriate mitigation measures are enacted when necessary.

Goal (FW-GO-REC)

CCRC supports the two goals to work with user communities and other groups to be responsive to concerns about changing recreation demands and emerging issues.

Objectives (FW-OBJ-REC)

The objective is responsive to CCRC's concerns about impacts to soil quality, water quality and watershed conditions. CCRC supports the objective.

01 Remove or relocate five existing recreation facilities, including dispersed sites, outside of riparian management zones, or undertake other means practicable if they are degrading aquatic or riparian resources over the life of the plan.

Roads and Trails (RT)

CCRC commented on concerns regarding Off Highway Vehicles (OHVs) June 5, 2019, listing impacts to watershed quality, wildlife habitat (disturbance, fragmentation), soil health, and disturbance of cultural sites. Increased recreation use is likely to affect infrastructure (roads, trails, campgrounds) and dispersed camp sites as well. The plan addresses some of the concerns previously raised by CCRC.

Desired Conditions (FW-DC-RT)

Contains wording that addresses effects of recreation use of roads and trails (transportation system) on other resources:

01 [hellip]The transportation system and its use have minimal impacts on resources including ecological integrity and diversity, threatened and endangered species, species of

conservation concern, heritage and cultural sites, watersheds, water quality and aquatic species. [hellip][rdquo]

Objectives (FW-OBJ-RT)

Outlines a maintenance schedule for roads and trails.

Standards (FW-STD-RT)

Establishes standards to protect streams and riparian areas from construction and maintain fish passage for stream crossings.

Guidelines (FW-GDL-RT)

Eight guidelines outline protections that reduce sediment delivery to streams, impacts to water quality, wetlands and unstable areas and maintain or improve watershed integrity.

However, the 2020 Forest Plan does not specifically address increased OHV use on Forest Service roads, particularly high clearance vehicle roads and two track trails. Increased motorized and mechanized use is resulting in displacement of soil fines, creating of ruts, rills, and gullies during snowmelt and/or rain storm events and creating new parallel road tracks as users attempt to avoid wet areas, erosional features or other obstructions in the road or trail.

CCRC would like to see emphasis on managing and mitigating the impacts of this increased use on roads and trails and guidance on how user created trails will be addressed or discouraged. CCRC suggests adding the following guideline:

To protect soil and watershed integrity from OHV and other motorized and mechanized use, motorized and mechanized trails will be periodically monitored to document the detrimental impacts such as loss of vegetation cover, loss of soil fines, erosion, formation of ruts, rills, small gullies, trail widening to avoid obstacles (ruts, rocks, washouts), off trail hill climbing/switchback cutting, cross-country, use and incorporated in a maintenance schedule or future travel planning to mitigate detrimental impacts and/or restore damaged vegetation or soil resources. Mitigation and/or restoration practices may include temporary or permanent trail closure.

Recreation Opportunities[ndash]Dispersed Recreation (RECDISP)

Dispersed recreation sites are proliferating within the Beartooth Mountains. As recreation use has increased both inside and outside the Absaroka-Beartooth Wilderness, so has the number of dispersed camp sites.

CCRC believes a guideline should be added, describing how the FS will manage and mitigate the impacts to soil, water quality and vegetation:

Guidelines (FW-GDL-RECDISP)

To protect soil and watershed integrity dispersed camp sites will be periodically monitored to document the detrimental impacts such as loss of vegetation cover, loss of soil, soil compaction, and erosion to be incorporated in a management strategy to mitigate the detrimental impacts and/or restore damaged vegetation or soil resources. Mitigation and/or restoration practices may include temporary or permanent closure of dispersed sites.

Absaroka Beartooth Mountains Geographic Area

Plan Components[ndash]Beartooth National Forest Scenic Byway (NSB)

CCRC is concerned about lands within the Main Fork Rock Creek drainage and within the view shed of the Beartooth National Forest Scenic Byway are identified as suitable for timber production. CCRC believes timber production is not a compatible use on the steep mountain slopes and valley bottom outside the 250 foot buffer along this historic and scenic highway. Additionally, CCRC believes the steep to very steep mountain slopes in the Main Fork Rock Creek drainage should be classified as not suitable for timber production due to technology not being currently available to harvest without resulting in irreversible soil damage. Additionally, these lands should be classified as unsuitable based on the scenic values along the Beartooth Scenic Byway and inconsistency with Desired Condition (AB-DC-NSB):

01 The intrinsic scenic, natural, historical, cultural, archaeological, and recreational qualities for which the Beartooth National Forest Scenic Byway was designated are present along the Byway.

CCRC suggests addition of the following suitability statement:

Suitability (AB-SUIT-NSB)

To protect the scenic characteristics of the Beartooth National Forest Scenic Byway, the Main Fork Rock Creek drainage is not suitable for timber production.

Monitoring Elements by Resource Area

Designated Wilderness (DWA)

MON-WILD-01

Recreation use is increasing in wilderness areas. How are detrimental impacts from human use being monitored and addressed or mitigated such as detrimental effects to soil, vegetation cover/composition and water quality at dispersed camp sites and livestock (pack stock) use on meadows and alpine grasslands? CCRC suggests an additional monitoring question:

Are soil quality, vegetation cover, native vegetation composition and water quality being maintained?

Suggest using indicators for soil quality/health and vegetation composition and cover. Incorporate periodic testing for water quality near high use dispersed sites.

Permitted Livestock Grazing (GRAZ)

MON-GRAZ-01

Monitoring is focused on reporting number of AUMs permitted. The Forest Service should also be monitoring livestock grazing allotments for compliance with allotment management plans, permitted numbers, season of use, forage utilization standards and changes in vegetation composition in key areas. CCRC recommends an additional monitoring element:

Number of allotments monitored annually for compliance with allotment management plans, stocking rates and forage utilization standards and periodically monitored for changes in in soil and vegetation condition and trend in key areas.

Similar wording should be added as a guideline or standard under Permitted Livestock Grazing (GRAZ).

Carbon County Resource Council would again like to thank the Custer Gallatin National Forest for the opportunity to provide feedback on the revision of the Custer Gallatin National Forest Plan. We look forward to further public participation in this process so that the direction of the National Forest will be representative of all interests.

Respectfully,

Susan Beug

Chairwoman, Carbon County Resource Council