

Data Submitted (UTC 11): 9/9/2020 3:40:48 AM

First name: Anne

Last name: Millbrooke

Organization:

Title:

Comments: Objector's name: Anne Millbrooke

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Name of lead objector (if more than one):

Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

?Land Management Plan

X Regional Forester's List of SCC

Statement of issues and/or parts of the plan revision to which the objection applies:

Too few species are listed!

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are:

There are too few species listed; for example, only one bird species despite the well publicized crash in North American bird populations in the past fifty years. See the attached article on the "Decline of the North American Avifauna" by Kenneth V. Rosenberg et al., published in the journal Science (2019). That appeared after the preparation of the list, but it certainly justifies updating the list.

The base line had already shifted way downward; for example, in the late 19th century William T. Hornaday estimated that Montana had lost 75% of its total bird population in the previous 15 years alone! There had been declining population. See Hornaday, "The Destruction of Our Birds and Mammals: A Report on the Results of an Inquiry," Second Annual Report of the New York Zoological Society (New York, 1898), 77-127.

The Northern Plains population of piping plover and the inland tern have apparently disappeared from the CGNF's lands, which should be a matter of great concern and a cause for remediation. These shorebird species should not be allowed to follow the Passenger Pigeon (last reported in Montana in 1882) and the Eskimo Curlew into extinction, and the National Forest should be protecting the habitat of our public birds! Nine in ten Evening Grosbeaks have been lost since 1970. These are migratory birds that uses boreal forest habitat in the Custer Gallatin National Forest, but the species is not on the list of species of conservation concern.

Birds are just one category of wildlife neglected in the list.

*Proposed Solution:

Update the list of species of conservation concern. Add species such as the Northern Plains population of piping plover and the inland least tern. Add the Evening Grosbeak. Update the list using the best available and most current science!

Statement demonstrating the link between objection and prior formal comments:

I expressed concern about wildlife and wildlife habitats and about using the best available science in my comments of May 15, 2019, and I expressed concern about mechanized recreation chopping up habitat and disturbing wildlife in my comments of June 4, 2019.

Signature: Anne Milllbrooke (digital signature)