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Comments: Comments by Dr. Kenneth Zahn

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1. The "Preliminary Need to Change" is not to be developed until AFTER the agency reviews material gathered during the non-NEPA assessment process period, not DURING it.

The 2012 Planning Rule responded to comment in developing the Rule that: " The requirement of the proposed rule to find a [lsquo][lsquo]need to change[rsquo][rsquo] during the assessment phase of planning has been removed to clarify that the assessment is not a decisionmaking process and does not require a NEPA document to be prepared. Changes to [sect] 219.7 clarify that the responsible official must review material gathered during the assessment to identify a preliminary need to change the existing plan and to inform the development of the plan components and other plan content. The information may be used and referenced in the planning process, including environmental documentation under NEPA."

Therefore, please circulate the actual Preliminary Need to Change draft document for public comment AFTER you review the assessment review comments.

2. As a preliminary planning activity before conducting ANY prescribed burn within the Hyalite, Cottonwood, or Bozeman Creek drainages, the Plan should include an early-Spring to late-Fall meso- and micro-meterological study of drainage wind patterns, windspeed and direction variability, temperature, and relative humidity. This is needed to better assure that the presently inadequate data set and "last-minute" decision-making by CGNF staff do not lead to the all-to-common result of out-of-control federal agency prescribed burns. Early emplacement of the proper equipment in the drainage being planned for a prescribed burn should be required by the Plan. Gathering this data will also assure that the CGNF is prepared to better understand and project the potential wildfire behaviors during fire season. At a public tour by GNF Public Affairs staff and Ranger Office staff during the conduct of the EIS preparation for the GNF Gallatin Watershed Project, the GNF fire staff promised during the lunch break while conversing with participants, that this be done in the Hyalite drainage as a planning step before conducting the Gallatin Watershed Project's prescribed burn elements, but has never done so. The CGNF staff has continuously ignored public comments asking that such planning data be collected.

3. The "Diversity" introductory quote of Army General Colin Powell was not made in the context of Forests; Remove it. Al Gore is not a climatologist; he's a politician now profiting from sale of carbon credits; remove his introductory quote. Theodore Roosevelt's introductory quote on some multiple uses (pg 53)implies that any extractive use (timber, mining, grazing,gathering forest products, etc.) is a "skinning of the the country by selfish men and greedy interests." The 1960 MUSY Act is law and you are required to balance the forests uses; embrace it, and delete this awful quote. The apparent desire of the CGNF to champion certain political views by selecting these quotes is offensive to many reviewing publics. Avoid potential controversy in your selections.

4. Figure 8 conflates several processes and clearly implies (left-side text) that the primary plant (tree) respiration product is carbon dioxide. It isn't -- it's oxygen. Fix the Figure to at least be in line with elementary-school-level science.

5. Sage Grouse discussion on page 45 is totally inadequate, given the current initiative by the DOI to withdraw millions of acres from recreational and other multiple uses. Update it.

6. On page 82 (and on others), the authors show their disdain for the many of the requirements of the 1960 MUSY Act by pretty much ignoring it. Include it here, and discuss its requirements here and in other applicable areas.

7. There is no recognition or discussion in this supposedly current assessment of Todd Orr's extensive and accurate inventory of GNF roads & trails, and their condition. Include it, discuss it, and reference it.

8. Reference and discuss the changes since the original plan that relate to the extent of reduction of access trailheads, recreational opportunities for motorized vehicles, and withdrawals by the various limits placed by DOI or Ag (FS) management.

9. Discuss the specific assessment of the ability of elderly and partially (mobility)-disabled hunters to be able to obtain one-time authorization/permission to retrieve game animals with off-road ATV.

10. Acknowledge the role of endless and sustained environmental-group lawsuit results in limiting many forest uses and programs -- motorized recreation, timber harvesting, watershed management projects, etc. These are impacts on CGNF management, budgets, plans, and programs that are just as important as the endless mention of the impacts of motorized recreation. Acknowledge it as an important piece of the assessment of current conditions.