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Comments: Subject: Draft Assessment Report Comments - Custer Gallatin National Forest New Management Plan

I read through most of the 130 page Draft Assessment Report and am making some suggestions, mostly applicable to the western part of the forest, as I live in Bozeman and most familiar with this area. I could not figure out how to make comments electronically, reviewing instructions multiple times and could not find a form for comments on the draft report. I did not read the detail reports available as I don't have time. I appreciate all the work that the CG Forest staff have done! I tried participating in the Collaborative, but was "run off" during the first meeting by very nasty, scary men who selfishly only care about their interests.

Page 42 (PDF page numbers, not the report page numbers). "However, several factors can accelerate, slow or even reverse this trend. These factors may include removal of live trees from the carbon cycle due to timber harvest, human land development, recent droughts, severe wildfires and insect and disease epidemics." This is confusing regarding stored carbon; accelerate, slow and reverse are opposites but you list only factors that will accelerate the trend.

Terrestrial Wildlife, Page 44 "[mdash]the Greater Yellowstone Area portion of the Custer Gallatin includes every single known terrestrial wildlife species that has lived in the area since settlers of European descent arrived in the 1800s. That includes grizzly bears, bald eagles, peregrine falcons, gray wolves and bison." There are many more species than just these 5 including Lynx, wolverine, bighorn sheep, etc. I would change your sentence to be more inclusive of the species that you have a paragraph or more about further down the page. Bald eagle, peregrine falcon and gray wolves are not even described in the list of species relevant to CG.

Species Classification, Pages 46-57, includes the description titled Species of Public Interest, but then in the detail paragraphs on each species, you state "species of interest". This doesn't tie to your classification title. You also leave out a descriptive paragraph on gray wolf; even though they primarily live in YNP, they roam large surrounding areas, and they are of very high interest to locals and nationwide visitors.

Bighorn Sheep, Page 48 "Management issues include invasive plants, human development, disease transmission from domestic sheep and goats, and potential lack of genetic diversity because of herd isolation. A thorny problem with bighorn sheep is that when the population increases, so does the likelihood of exposure to disease." Are you referring to domestic goats or wild mountain goats? You also talk about bighorn sheep being exposed to disease. You need to address the issue of federal grazing allotments for domestic sheep being allowed in areas where Bighorn Sheep live; those allotments should be reviewed as a part of the plan and a priority determined; you can't increase Bighorn Sheep numbers if the federal government continues to allow allotments in areas where Bighorn Sheep increases should be the goal. You mention that Bighorn Sheep

numbers are much lower than historic numbers. You need to consider phasing out domestic allotments.

Bison, Page 49, Since the Forest Service will be the lead agency in 2017 of the IBMP, you need to consider public lands adjacent to YNP for additional places for bison to migrate and live, especially since they are descendants of the last wild, plains bison herd and you state they naturally migrate north in the Gardiner Basin (since they are plains animals and the snow is too deep to find food). The Gallatin National Forest should prioritize bison habitat over mining, timber, grazing, phasing out leases so the bison have more room to feed themselves. There are also other federal lands in Montana, especially north in the Charles Russell Wildlife Refuge, BLM lands, etc. and other Indian reservations where bison could be moved.

You also state "Bison management concerns include population growth that exceeds available habitat and public concern over livestock exposure to brucellosis, a bacterial infection that can cause failed pregnancy and temporary sterility. While there have been no documented cases of brucellosis transmission between bison and livestock, management policy is to keep bison and livestock separated as much as possible, given land ownership restrictions. However, potential land management agreements could expand the habitat area, and in December 2015 Montana Governor Steve Bullock signed a decision notice that expanded the "tolerance zone" for bison, mainly west of Yellowstone National Park." You say public concern over livestock exposure to brucellosis. This is incorrect - only business owners in the livestock industry feel this way. The general public does not. We think the federal government has wasted millions of dollars of public money to the detriment of the wild bison; you even state that there is no evidence of bison causing this. The National Forest Service should not allow rumor and uneducated opinions to trump scientific information.

You also say Governor Bullock's decision is a tolerance zone "mainly west of YNP". What other direction is there for the bison to migrate in the Hebgen Lake area?

Grizzly Bear, Page 53, "Given that the local grizzly bear population and distribution have exceeded targets, some people view grizzly-related land restrictions as an unnecessary infringement on the rights of people to use public land. Other management concerns include conflicts between bears and people (a rising concern with more people accessing backcountry areas), livestock predation, the impact of insects and disease on whitebark pine seeds (a grizzly food source), and genetic isolation from more than 50 years of being cut off from other grizzly populations. The Bridger, Bangtail and Crazy Mountain Ranges could be used as corridors to connect these habitats." You left out how important the moth is as a food source to the grizzly at certain times of the year, and cutthroat trout is another historic food source.

Your paragraph is not balanced - you talk about some people view grizzly restrictions as an infringement; but you don't about another major group of people who love wildlife, even if we don't get to see them, want grizzlies to not be delisted. You don't mention that 3 surrounding states would add hunting of grizzlies if they are delisted and a large group of people do not support trophy hunting of a treasured wild animal, since they are not eaten for food. This is another reason the population will not be stable. The concern about genetic isolation is critical and you mention it but you only mention the Bridger-Bangtail-Crazy corridor; how would a grizzly get to these mountains - walk through Bozeman, Livingston or Big Timber? You don't mention mountain ranges to the west of the CG as possibilities.

Moose, Page 53, your write up is very slim; why wouldn't you say you will work with MTFWP biologists to find out the status of moose in the CG - they can tell you whether we are in another low cycle, climate change, hunting

impacts.

Mountain Goats, where are the populations falling in some parts of Montana - is that relevant to the CG? If snowmobile use is a possible detriment, why isn't that analysis listed in order to solve this problem.

Page 48, "State fish and wildlife agencies manage wildlife while the Forest Service manages their habitat." This is not exactly true; federal and state agencies manage both, but utilize different legal requirements.

Mule Deer, Page 54, "Montana and South Dakota are charged with species management." It would be better to state that the Fish, Wildlife agencies in MT & SD manage hunting according to habitat and numbers. Why would mule deer be discussed differently from the other species in your document. White Tailed Deer - if they are a Species of Interest, they should be covered in your plan.

Conclusions, Page 56, these are very vague. You should list each species of concern will be addressed in the plan. You should work with Montana FWP wildlife biologists so you have common data and research. MTFWP's Core Values include Provide Stewardship "we manage for healthy and abundant fish and wildlife populations, improve and protect habitat, and protect and restore cultural and historical resources" (Vision 2016-2026).

Grazing, Page 75, "While grazing is an important use, the Forest Service balances that use with other needs, including management improvement and protecting soil, water and vegetation." You should add trees and wildlife habitat as a consideration. If there are 18 vacant grazing leases and you've been closing them since 1986, why isn't analyzing and closing these 18 a priority as potential grizzly and bison habitat.

Page 80, "There may also be management constraints to protect threatened, endangered or other at-risk species." This statement is written as if grazing is a priority. Grazing should be a lower priority any time there is a threatened species.

Mining, Page 90, regarding the Stillwater Complex you have not mentioned the new owner, a foreign buyer, which will require a new working relationship with the US Forest Service.

Recommended Wilderness, Page 101, you should describe the difference between this category and the Wilderness Study Areas. "While none of these areas have been designated as wilderness, they are generally managed in a way that protects their condition for consideration as designated wilderness." Why is it just "generally" instead of managed to protect their condition?

Wilderness Study Areas, Page 104 "Congress established wilderness study areas to allow selected areas to be reviewed for suitability for preservation and to direct land management agencies to manage the areas to retain their wilderness characteristics. They are managed in this way until Congress designates or "releases" them. A wider range of uses and activities are permitted in these areas compared to designated wilderness." These two statements are in opposition; if Congress directs retain wilderness characteristics, how can a wider range of uses be permitted? Please clarify.

"The 155,000-acre Hyalite Porcupine Buffalo Horn is the only wilderness study area on the Custer Gallatin. This area is important for several reasons, one being that it's home to a wide range of vegetation and wildlife species." This statement minimizes all the wonderful features of this area including endangered and threatened species, water not only City of Bozeman but the entire Gallatin Valley and into the Missouri and Yellowstone River basins, etc. Just because there is a whole list of public uses allowed, doesn't mean all these uses should be on every piece of the HPBH. Uses need to be prioritized in each area depending on the restrictions of the natural resource. You haven't mentioned trail and area sharing, which is commonly allowed in the Travel Plan. The Travel Plan needs to be revamped to meet the higher priorities of resource protection and safety of users. When hiking all over the Gallatin trails, those trails that also allow bicycles and motorized vehicles, it is extremely dangerous to the hikers. I have experienced near crashes and being scared numerous times.

Concerns: you only list invasive species, fire exclusions, new recreational uses. You need to add wildlife habitat protections, endangered species protections, conflicting recreational uses, recreation, mining, timber, roads damaging wildlife habitat.

Page 105. Please include a summary of the conclusions of the Gallatin Community Collaborative final report 2016. Don't forget that this was not a scientifically determined group with equal representation from all the user types, professionalism was not exhibited, it was only a small group of activists. The Custer Gallatin National Forest is owned by all American citizens from all the States and Territories. You need input from all types of Americans, not just people who live and have businesses impacted by FS rules. I didn't see anything in your document about getting input from non-Montanans.

We need statistics showing the miles/acres each recreation type has available to the including non-forest service. There are millions of miles of public roads that motorized vehicles can use; opening up more Public Forest Service lands to motorized recreation is not equal access to public recreation.

Recreation Settings, Page 115, "Yet recreational uses need to be weighed against sustainability and environmental concerns, including the need to protect habitat for grizzly bears, bald eagles and cutthroat trout." Bald eagles are not listed as a species of interest in the document.

Page 119, Budget declines for the NFS are alarming and likely to get worse under the Trump Administration. You can't possibly do all the monitoring, maintenance, operations. It is not realistic that you can do all the things you

are addressing in this plan even with volunteers and non-profit environmental and wildlife organizations and State agencies to protect the natural resources of this forest or any other. Somehow you need to get the attention of the general public and Congress and be realistic. You also cannot set yourselves up to fail because you couldn't meet all the goals you have. The NFS needs to determine the bottom line of what can be done reasonably. Wildlife, wildlife habitat, scenic, cultural/historical, native American resources need to be protected as much as possible. All of us recreationists and commercial businesses should have a lower priority.