

Data Submitted (UTC 11): 6/5/2019 12:25:16 AM

First name: Deborah

Last name: Carter-Drain

Organization:

Title:

Comments: Thank you for the opportunity to comment on The Custer Gallatin National Forest's Draft Management Plan. My comments specifically pertain to the Absaroka Beartooth, Madison, Henrys Lake, Gallatin, and Pryor Mountain geographic areas. The Greater Yellowstone Ecosystem, which includes the Absaroka Beartooth, Madison, Henrys Lake, Gallatin geographic areas is one of the last remaining and one of the largest nearly intact temperate zone ecosystems on Earth. Given that it surrounds Yellowstone National Park, what should be a World Heritage Site, the value of this ecosystem to flora and fauna cannot be over stated. Nor can its contribution to clean water, a requirement for all living things, be overstated. This ecosystem is irreplaceable.

Along with tourism, the population and urban growth explosion in Gallatin County, has added significant stress on the Greater Yellowstone Ecosystem, affecting water quality, soil stability, wildlife, habitat quality, and air quality. Additionally, climate change is significantly impacting habitat and wildlife populations and their respective geographic distributions. It is critical that the new management plan address all threats, including climate change, by protecting water quantity and quality, habitat, and wildlife populations, and by placing some type of limits on "out of control" recreation. It is incumbent upon the USFS to identify and adapt management techniques to address the impacts of all stressors.

To meet this goal, I support the full incorporation of the Gallatin Forest Partnership (GFP) Agreement into the plan for the Gallatin and Madison ranges. While alternative C incorporates parts of that agreement, it does not accurately reflect the GFP's recommendations for wildlife protections or recreation monitoring. Looking outside the GFP agreement, it is also critical that we protect and enhance other areas, including wildlife linkage areas and existing wilderness, and include enforceable climate change components. I recommend the following revisions in relation to the Gallatin and Madison ranges to Alternative C in the draft plan:

*Ensure wildlife connectivity in portions of the Madison, Henrys Lake, and Gallatin Geographic Area that aren't otherwise protected by the grizzly bear recovery zone. The Madison Range is critical for wildlife movement to areas beyond the National Forest, i.e., Yellowstone National Park and Targhee National Forest (ID).

*Habitat protections for grizzly bears must extend wherever population health is monitored and into areas important for connectivity. Grizzlies must also be designated as a Species of Conservation Concern.

*Plan components must support a year-round self-sustaining bison population within tolerance areas on National Forest System lands.

*West Pine and Porcupine Buffalo Horn backcountry areas must mirror Cabin Creek Wildlife Management Area in wildlife protection and wild character plan components.

*Recreational use must be monitored more extensively by area, and standards must ensure that increasing recreation is balanced with wildlife and habitat protection.

*The existing wilderness areas must be managed in accordance with the 2020 Vision.

*Given the uncertainties of climate change, monitoring questions for vegetation, invasive species, aquatic resources, fire, and wildlife, this plan must explicitly assess the effects of climate change and guide adaptive management as required by the 2012 planning rule (219.12(a)(5)(vi)).

*In addition to the 30 rivers recommended as eligible for Wild and Scenic designation, Taylor Creek, Hellroaring

Creek, and the South Fork of the Madison should be included due to their outstanding wildlife values.

Like the Greater Yellowstone Ecosystem, the Pryor Mountain geographic region has a unique and distinct value for plant communities and wildlife. Due to the various elevation and moisture regimes, there are many habitat types that host both plant and animal species found nowhere else in Montana. The Pryor Mountains contain Important Plant, Wilderness Study, Important Bird and Biodiversity, and Proposed Wilderness Areas. These designations recognize the ecological value of the Pryors and highlight the importance of preserving areas that remain less accessible to humans and off-limits for road building. Managing for roadless areas is critical to retain important ecosystem functions, retain water quality, reduce the likelihood of invasive weed establishment, and serve as critical cover and escape terrain for wildlife. Additionally, it reduces deleterious impacts to wildlife by humans.

Areas in the Pryors that should be categorized as Recommended Wilderness Areas due to their unique and wilderness quality attributes were not included in Alternative C. Of the four Recommended Wilderness Areas, only Lost Water Canyon is included as a Recommended Wilderness Area in Alternative C. Big Pryor, Punch Bowl, and Bear Canyon were included only as Backcountry Areas, whatever that is. I could not find a succinct definition of what a Backcountry Area is, but from what information is available on USFS site, it appears that any use may be implemented, depending upon who has the loudest voice, and what is not necessarily appropriate for habitat or wildlife.

As relatively untouched areas, Big Pryor, Punch Bowl, and Bear Canyon should be included as Recommended Wilderness Areas due to their provision of significant ecological services and diversity in contrast to the majority of the Pryor Mountains, which already allows for motorized and non-motorized vehicle use.

I appreciate that the Custer Gallatin National Forest is revisiting the Management Plan to the benefit of habitat and wildlife. The Draft Plan and DEIS include many strong points, and with the recommended revisions the final management plan can become an important tool to guide sustainable forest management. Thank you for your work on this important issue.