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Comments: Adopt Alternative D and list American bison as a species of conservation concern

Custer-Gallatin National Forest Plan Revision

Custer-Gallatin National Forest

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RE: Adopt Alternative D and list American bison as a species of conservation concern

Dear Forest Plan Revision Team

I support Forest Supervisor Mary C. Erickson adopting Alternative D, the environmentally preferred alternative in the Custer Gallatin National Forest plan.

I also support Regional Forester Leanne M. Marten listing American bison as a species of conservation concern in Region 1.

Please strengthen Alternative D by adopting the following standards and desired conditions:

- * The best available scientific information supports strengthening and adopting alternative D with enforceable standards for American bison, bighorn sheep, and threatened grizzly bears.
- * Conserving American bison viability and diversity should be a forest-wide standard.
- * Freedom for American bison to roam National Forest habitat should be a forest-wide standard.
- * Restoring habitat connectivity for American bison should be a forest-wide standard.
- * To restore connectivity, and conserve the viability and diversity of American bison's genetically distinct subpopulations, the Custer Gallatin needs to adopt a standard to close and not permit cattle grazing allotments in American bison range.
- * To restore connectivity, and conserve the viability and diversity of native bighorn sheep populations, the Custer Gallatin needs to adopt a standard to not permit domestic sheep grazing in bighorn sheep range.
- * The best available scientific information supports including enforceable forest-wide standards to protect key linkage areas, habitat connectivity, and food security for threatened grizzly bears.
- * The Custer Gallatin must adopt a forest-wide standard for all grazing permits requiring "let-down" fencing and remove barriers that impede migration of native species.
- * Adopt a desired condition for the Custer Gallatin to be a leader in the development of wildlife safe passages and measures on highways constructed in migration corridors on the National Forest.

* Restore more wetlands, creek banks, pond edges, and riparian habitat through strong standards and more yearly projects to benefit American bison and native species diversity.

* The Custer Gallatin has a duty to fulfill its' responsibilities and trust obligations safeguarding treaty rights, sacred species, sacred sites, and traditional cultural places of significance to aboriginal people.

Relying on the best available scientific information, please select Alternative D and adopt strong standards for American bison, bighorn sheep, threatened grizzly bears, wilderness, linkage corridors, habitat connectivity, and water.

The Custer Gallatin landscape evolved with bison as a keystone species. I strongly support adoption of Desired Conditions and other plan components that recognize and facilitate the interrelationship of free roaming bison to the ecological integrity and sustainability of prairie, grassland and woodland ecosystems per the 2012 planning rule:

§ 219.8 Sustainability.

The plan must provide for social, economic, and ecological sustainability within Forest Service authority and consistent with the inherent capability of the plan area, as follows:

(a) Ecological sustainability. (1) Ecosystem Integrity. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account:

(i) Interdependence of terrestrial and aquatic ecosystems in the plan area.

(ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area.

(iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.

(iv) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change.

(v) Wildland fire and opportunities to restore fire adapted ecosystems.

(vi) Opportunities for landscape scale restoration.

(2) Air, soil, and water. The plan must include plan components, including standards or guidelines, to maintain or restore:

(i) Air quality.

(ii) Soils and soil productivity, including guidance to reduce soil erosion and sedimentation.

(iii) Water quality.

(iv) Water resources in the plan area, including lakes, streams, and wetlands; ground water; public water supplies; sole source aquifers; source water protection areas; and other sources of drinking water (including guidance to prevent or mitigate detrimental changes in quantity, quality, and availability).

(3) Riparian areas. (i) The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of riparian areas in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account:

(A) Water temperature and chemical composition;

(B) Blockages (uncharacteristic and characteristic) of water courses;

(C) Deposits of sediment;

(D) Aquatic and terrestrial habitats; (E) Ecological connectivity;

(F) Restoration needs; and

(G) Floodplain values and risk of flood loss.

(ii) Plans must establish width(s) for

riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands,

within which the plan components required by paragraph (a)(3)(i) of this section will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes.

Sincerely,
Claudia Narcisco
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