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Comments: The proposed Custer Gallatin forest plan and accompanying draft EIS represent a monumental effort by local USFS personnel. The thoroughness of these documents anticipated many of my questions and possible concerns about the new forest plan. In general, if a reviewer examines subjects of interest in depth, adequate information can be found in the resources provided online. Because the variety of natural habitats in the Custer-Gallatin is so complex, proposals are broad in scope by necessity.

Three overarching themes appeared to guide the plan. Projections are made on the basis of a 15-year time frame. Is this a regulatory requirement for this particular plan, a traditional time frame, or a new method for proposing plans? I bring this up because 15 years is a short interval compared to the life span of many forest resources, particularly suitable timber. This could make projections for changing conditions problematic, but not necessarily invalid. On the other hand, the intended time frame is apropos for consideration of factors such as increased demand for recreational use, especially in areas of rapid population growth, such as Gallatin, Park, and Yellowstone counties. At some local levels, demands for forest resources in 15 years may have little resemblance to current needs.

A second consideration is the potentially conflicting dual mandate of the USFS planning process. The purpose of the forest management plan is protect the existing resources while also providing for social benefits, including economic, recreation, and public health interests (e.g., clean drinking water). Yellowstone Park traditionally operated under a similar mandate: 'protection of the geysers and other wondrous features therein' but also 'for the benefit and enjoyment of the people'. In recent years, there has been an unofficial shift there to give greater consideration to non-resource social benefits, such as positive economic gains to the gateway communities by the park. Despite the high resource protection standard of Yellowstone being managed as a de facto wilderness, emerging impacts from the yearly visitation rate of more than 4 million visitors illustrate how fragile regulatory protection can be. This dilemma is even more acute for USFS, because the directive of producing forest products for economic return makes the forest management process even more complex. The draft plan and the proposed alternatives differ primarily by amounts of allowable human uses in various parts of the forest.

Lastly, one of the more common phrases used in these documents is "conflicting uses". Differing allowed uses constrained by various land management designations often lead to some of these conflicts. That appears to be a primary consideration in the planning process. Ideally, all land allocations would strictly be determined by the best available science guiding the resources of interest. There is a wide spectrum of opinion on the best uses for any particular geographical area. The "best use" for individuals is often strongly influenced by what they feel is most in their own benefit. Thus, an important component of the planning process is the balancing of numerous different value systems. An important caveat is that any particular individual value is not more important than another individual's different (but contrary) value. The economic and social sustainability section of the DEIS tangentially touches on these concerns and provided unbiased information. Results were not surprising (i.e., eastern rural agricultural placed counties high value on cattle grazing, while greater resource protection and recreation were more important in urbanized Gallatin and AB Mountains geographic areas).

With these considerations in mind, Alternative D contains the most comprehensive elements to ensure some type of resource protection for the life of the plan. Wilderness study areas may "restrict" some forest uses that particular users value highly. However, these same areas are the best existing locations to continue ecosystem processes and to enhance values such as fully functioning headwater basins. Other alternatives "trade off" nearly two thirds of the potential wilderness protection areas. The primary emphasis in the other alternatives appears to be an emphasis on traditional and emerging forms of recreation-primarily motorized and mechanized



equipment to more easily access some areas as designated proposed wilderness. Wilderness areas are not inaccessible-anyone can walk in their anytime they want. Just because I'm a bit older and the hikes are harder, doesn't mean that I can't go there. Those that choose to restrict their access to mountain bikes, ATVs, and snow machines have a different "access value" than I do.

Wilderness areas are critically important because of their scarcity. They are the rare areas where ecosystem processes can function as intended. As a limited resource these areas need to be given the fullest legal protection. The evolution of wilderness areas is a one-way trajectory. Once a decision is made to use that particular area for other purposes, it is virtually unattainable to return that area to its former pristine state. I'm unaware of other land public land areas that could be proposed for wilderness areas, so the areas under Alternative D may be the only options. As values in society change in the future, new legislation could rescind the wilderness designations. Alternatively, new remote mining below wilderness areas might be proposed in the plan as areas of extreme NW Montana are now experiencing. Wilderness designation by Congress would seem to be the ultimate forest protection; however, recent legislative attempts in Montana have shown a preference for lessening wilderness protections.

Another important consideration about Alternative D is the concept of "existence value". As the social sustainability section of the DEIS explained, areas such as wilderness exemplify the broader geographical focus than the local stakeholders. National and international interest is attached to these special areas by many people who will most likely not visit the areas. Nevertheless, the areas are still important to them because they know they are protected. As stated in the discussion of wilderness existence values (p. 518): "wilderness areas are demonstrations of human restraint and humility".

The plan's BMPs give some guidance on how to minimize disturbance to fragile forest areas under a variety of uses. It's important to note that there will be some impacts whenever human activities take place in the forest. Riparian management zones are a necessary exclusion for many traditional streamside uses, because an increasing amount of "negligible impacts" with a rapidly expanding group of forest users can lead to measureable impacts over time. Even catch and release angling is not the same as "no kill", because some mortality occurs despite the best efforts at protection. The more that BMPs are followed, the better chance there is to maintain a sustainable forest. Possibility that even these protections will be insufficient to move toward the desired future conditions of the forest plan. Recent and ongoing legislative initiatives and executive actions at the national level have focused on reducing protections for many public natural resources and aquatic systems in particular. For example, the Stream Protection rule published by DOI-OSM in December 2017 was voided by Congress a few days later. More recently, per Executive Order, the Army COE and EPA revised definitions of waters of the United States that would be subject to federal water quality standards. This brief redefinition of eligible waters lacks any scientific justification for rescinding the updated standards approved in 2015. Using "best available science" does not appear to be not part of these decisions. At a more local level, loss of wilderness protection in other parts of Montana has been proposed by some members of the Montana Congressional delegation, such as H.R. 5149-Unlocking Public Lands Act (preceded by H.R. 5148). Although beyond the purview of the Custer-Gallatin, these regulatory actions may pose an additional threat to ephemeral and small order streams of the CGNF.

Tables 9 and 10 in the executive summary clearly show that Alternative D contains the most opportunities to achieve progress towards the natural desired conditions of the forest region. Nearly all of the threats to the forest are directly or indirectly human caused-invasive species, riparian degradation, overcrowding, climate change, and some wildfires. For this reason, a significant portion of forest management has now become "human management" in an effort to protect those uses we value the most.

Historically, the USFS was recognized primarily for its fire suppression activities. With the generally accepted warming climate trends and increased fire severity and frequency the Northern Rockies are experiencing, over half of USFS annual budgets now can be absorbed in fire suppression. Consequently, funding constraints are



frequently cited as a possible limitation in progressing towards future desired conditions. USDA has probably researched this topic extensively and tried to find new budget solutions. I don't have too many answers, but I will state that I'm against the salvage logging, particularly near the riparian areas. Portions of the Custer Forest between Yellowstone Park and Cooke City were logged after the 1988 fires. The lack of regenerative growth 30 years later is a good illustration of the potential problems. Encouraging natural reseedling may be a more appropriate solution.

I would also encourage the USFS to expand its volunteer participation as a step towards achieving desired objectives. Groups such as Americorps, SCA, and MCC require some supervision and logistical coordination, but they have proved to be invaluable for many conservation projects nationwide. Short-term assistance from a variety of user groups could generate a growing appreciation for broader functions and preservation goals.

To reiterate, I support Alternative D because it strives for the most resource protection for the forest and is most closely aligned with the USFS mission of preserving the ecosystem functions, while also providing numerous recreational opportunities and social, economic, and cultural benefits to the geographic region surrounding the Custer-Gallatin Forest.

The proposed forest plan revision is a welcome update to the previous forest plans and appears to objectively encompass much of the new information and emerging affecting natural resources in the past couple of decades. If nothing else, the proposed plan is an effort to slow down the accelerating "tragedy of the commons" that accompanies the rapidly expanding populations of the adjoining counties. A tremendous amount of information has been provided by the planning staff. I appreciate the opportunity to comment. Thank you for your consideration of my comments.

Dan Mahony