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Comments: Mary Erickson, Supervisor

Custer-Gallatin National Forest

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Subject: Forest Plan Revision

Dear Supervisor Erickson,

Thank you for taking the time to consider my comments as you revise the management plan for the Custer-Gallatin National Forest. As a long-time 30+ years resident of Livingston, I am particularly interested in the future of the Crazies and how we might best protect and enjoy this unique area of the forest, and most of my remarks are confined to that range. My additional comments pertain to wild bison, an issue of particular interest to me for a very long time.

The Crazies are a special area, and as a resident who gazes on them every day and has recreated there many times, I am in strong support of efforts to recognize and protect that uniqueness long-term, particularly in the context of the spiritual and cultural history of the area. I am in awe every time I drive by or fly over or camp or hike in this inspiring island range and see its snowfields, high peaks and sawtooth ridges, waterfalls and wildflower meadows.

Alternative C recognizes the Crazy Mountains Backcountry Area which encompasses about 88% of the Inventoried Roadless Area, but with standards and legal protections that fall far short in actual protection of existing wildland and cultural values for this iconic range. New trails, expanded bike use and other increased use would be allowed, for example. Alternative D offers the strongest protection as a Recommended Wilderness Area with continued grazing where it currently exists and greater restrictions on motorized use and development, but with boundaries greatly reduced from Alternative C (73% of IRA).

I encourage the Forest Service to find a better approach to managing the Crazies, one which sincerely protects this range's wilderness values and primitive character, the opportunities it offers for solitude, and its cultural significance within the largest IRA possible: adopt, at a minimum, the protections of Alternative D that disallow any new developments or expansion of motorized and mechanized uses within the larger boundaries of Alternative C.

Many but not all private lands stewards have for generations operated to maintain the wild character of the Crazies. Now is the time to partner with these landowners and others to meet the challenges of the checkerboarded landscape to provide the longer-term protections that are necessary and meaningful under the significant threats of climate change and overuse.

This plan will provide forest management direction for decades to come. The DEIS recognizes the impacts of climate change, but the alternatives seem to vastly minimize the impacts of business as usual - or anything that does not truly try to anticipate and prepare for the dramatic changes ahead. This is the issue of our times. Climate change impacts have advanced further and faster than envisioned when you developed the last management plan and are likely to far exceed what many are willing to acknowledge even now. Climate change requires tough decisions.

In the meantime, this area is growing in population and popularity, uses are changing and often creating impacts not anticipated in decades past. Your DEIS recognizes the marked rise in recreational use of Forest Service lands, including lands in the Crazies of great cultural significance to tribes, a use you describe as sometimes disrespectful to indigenous values.

I urge you to envision the Crazies and plan for its management in the decades to come to ensure that ecosystems are resilient and healthy in the face of dramatic changes resulting from climate change; that recreational, agricultural and other uses do not overwhelm this special place and magnify the impacts of climate change on our water, soils, plants, wildlife and cultural sites; and that indigenous values are respected and protected through sound stewardship. Strong, clear and transparent protections are needed to keep this landscape and the human and wildlife communities it supports healthy into the next half of this century.

We cannot let this area degenerate into an overused backyard. The solitude it can still offer is sorely needed today. Limited trail and stock use and access can help keep it that way, and the Forest Service has the ability to deny any new road or trail developments. Set the bar high and commit to protecting the remote and primitive nature of the Crazies.

My other comments focus on the issue of wild bison. As noted in your DEIS, the current Forest Plan provides no direction for managing wild bison. I don't think it even mentions wild bison. Yet, since even before your current plan was adopted, bison attempting to move out of Yellowstone National Park have been a challenge for the NPS and the state of Montana.

As someone who worked on this issue for decades on behalf of conservation organizations, including lobbying at the Montana legislature, I appreciate that the Forest Service has since joined with federal and state agencies and tribes to adopt a management direction that would allow wild bison much broader use of Forest Service lands. While challenges still exist, this cooperative approach is the best mechanism currently to developing management plans that can adapt to changing conditions.

I encourage you to adopt Alternative D with respect to managing wild bison. Alternative D, as stated in your DEIS, is the most proactive approach to managing bison because it is the only alternative that provides for year-round occupancy in sufficient numbers and adequate distribution to provide a self-sustaining population on the forest. This, I believe, is what the GYIBC is and should be striving for, and adopting this alternative provides clear direction for the FS and its partners.

Thank you for considering my comments.

Sincerely,

Jeanne-Marie Souvigny