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Comments: After reviewing the 2020 Land Management Plan for the next 20 years for Custer Gallatin National Forest(CGNF), we have decided to object to parts of the plan which are extremely important to us, wilderness designations, species of conservation concern and the subsequent effects on threatened and endangered species. We believe the final plan is not in the best interest of Montanans, the American people or the lands, waters and wildlife of the CGNF. We always felt that ALT. D was best for the ecological integrity of the forest.

The plan neglects the importance of preserving the entire Hyalite Porcupine Buffalohorn WSA (HPBWSA) as wilderness for wildlife connectivity and it neglects the effects of climate change on the landscape. ALT D supported a total of over 700,000 acres of wilderness but your plan only recommended 77,000 acres of wilderness for the HPBWSA, neglecting the importance of this entire region north of Yellowstone National Park (YNP) for wildlife connectivity and ecological integrity. In 1977 Congress stated that all of the WSA qualified as wilderness. The removal of Hyalite, West Pine and So. Cottonwood means that connectivity is disrupted because of potential logging and thinning at the north end of the range. Backcountry and recreation areas are certainly insufficient to protect imperiled wildlife because of allowed motorized and mechanized use. Research shows that these disruptions displace wildlife. Designations of recreation, backcountry and timberland areas allow for habitat fragmentation, removing 1,000,000 acres from wildlife habitat and connectivity. Almost 700,000 acres, 22% of the Forest are eligible for timber production; there are also discrepancies between total lands available in tables 5 & 8. But only 4% of CGNF is recommended as additional wilderness. How does this affect ecological sustainability and integrity? Very negatively. You must restore Grizzly Bear Recovery Zones to wilderness to protect the Great Bear. Climate change effects on top of this shortfall are barely mentioned.

Then there is the lack of species of conservation concern, specifically the lack of bison wolverine, bighorn, moose and swift fox. The science, like Craighead's analysis, was right in front of you, yet you refused to act in the best interest of protecting our shared natural heritage. There are no standards for allowing bison to roam, to migrate, nothing about securing habitat for this to occur. We are convinced that politics, not science destroyed this process. Bison are denied access to the Forest because of man-made migration zones, not actual migration areas. There are no free-roaming bison because the Forest refuses to act to allow them access.

Wilderness buffers are replaced with more logging, more roads, more trails and recreation; this translates to less natural world and less wildlife. The Porcupine and Buffalohorn drainages are crucial for wildlife migration yet they are not protected. Backcountry designation does not protect wilderness character because it allows motors, logging, roads and trails, habitat fragmentation. This is why at least 250,000 acres should be designated wilderness.

Then there is climate change. Moose and wolverine are heavily affected. Preserving old growth forests are a fundamental factor helping to mitigate the effects of climate change. Logging, prescribed burns and the incredible waste of resources and the pollution they entail will make things much worse, for us and for the critters that depend upon us to preserve ecological integrity.

ALT D is the best for the Forest in the long term and we would like to see the CGNF planners go back to the drawing board and do it right, for future generations of both people and wildlife, for the land and waters upon which we all depend. We love the CGNF and have explored it for over 40 years. We value our wilderness heritage and our extraordinary biodiversity. Please preserve the integrity of our unique and spectacular ecosystem. Thank you.