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Comments:

On behalf of the National Parks Conservation Association please accept these comments. Thank you for your consideration.

On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to submit comments on the Draft Revised Forest Plan: Custer Gallatin National Forest (draft plan). The Custer Gallatin National Forest (CGNF) plays a vital role in the overall integrity of the Greater Yellowstone Ecosystem (GYE) including many species that are at risk including grizzly bears, Canada lynx, and wolverines. In order to ensure that the CGNF continues to provide vital habitat for the regionally abundant and unique wildlife species especially considering the increasing pressure species face from regional population growth and a changing climate, NPCA recommends that the Forest Service advance Alternative D.

Formed in 1919, NPCA's mission is to protect and enhance America's National Park system for present and future generations. NPCA gives voice to those who support the national parks and broader park adjacent ecosystems with over 1.3 million members and supporters, including nearly 7,000 in Montana. NPCA has a long history of advocating for the protection of national parks and park resources, both inside park boundaries and on adjacent lands by working to connect our national parks with surrounding landscapes and maintaining habitat connectivity that is important for wide ranging wildlife species.

The lands managed by the CGNF are an important component of the GYE and provide habitat that serves to promote connectivity between the GYE and other ecosystems such as the Northern Continental Divide Ecosystem. The GYE is one of the largest nearly intact temperate-zone ecosystems on Earth providing essential habitat for a diversity of wildlife as well as a vital refuge that will play a crucial role in the ability of species to survive in the face of a changing climate.

Climate change adaptation strategies must focus on adequate habitat protections and healthy species populations in order to respond to current impacts, and address anticipated future impacts, to biodiversity as a result of climate change.

The CGNF borders much of the northern and western boundaries of Yellowstone National Park and contains habitat that is used by wildlife that moves beyond the border of the park to reach seasonal habitat or important resources. Therefore, management decisions and activities on the CGNF have a direct impact on Yellowstone and park resources including wildlife, water and air quality, and visitor experience.

Due to the CGNF proximity to Yellowstone, the important role the CGNF plays in the health of the GYE and numerous wildlife populations, as well as the opportunity the CGNF has to mitigate the impacts of a changing

climate and provide for greater ecosystem resilience, NPCA urges the Forest Service to take this opportunity to build a stronger vision and set of desired conditions in order to conserve this unique wildlife abundant landscape. The Forest Service should also develop enforceable commitments and strategies to move the CGNF toward that vision. This includes a stronger commitment to reducing the impacts of recreational activities on wildlife, implementing strategies to reduce human-wildlife conflict, and managing more lands to support wildlife populations and connectivity for species across the landscape.

Within the vision statement, for the Greater Yellowstone Area, the Forest Service should expand the vision statement to not just have the CGNF be [ldquo]part of a large connected expanse of core public lands providing scenery, opportunities for solitude, and primitive recreation[rdquo], but explicitly include that the forest lands within this geography will be managed to provide habitat for an abundant array of species.

The CGNF has the opportunity with the plan revision to ensure greater connectivity for species such as grizzly bears, ensure habitat is managed for bison on a broader landscape, and increase the ability of species to move across the landscape. We have provided initial recommendations for several plan comments in the Proposed Action Comments that we submitted and have reattached those comments for further consideration.

In addition to the recommendations and concerns that we raised in our Proposed Action Comments please accept the following recommendations:

Bison

The CGNF is critical habitat for and used by wild, migratory and resident bison. Approximately 88% of lands in the newly designated bison tolerance zone (~380,000 acres in total) outside of the Yellowstone are on CGNF lands. Though bison now have access to ~380,000 acres of land outside the Park, they are still only using a small fraction of this area. This severely constrained distribution is not only a viability concern for the population and the species as a whole, but it also further perpetuates the significant management issues surrounding this population (i.e. dependence on the unacceptable practice of shipping bison to slaughter, unsafe and inhumane hunting in overcrowded small patches of land, etc.). While we realize constraints on their current distribution are due in part to current and past management actions and hunting, there is much more the CGNF can do, from a habitat perspective, to help facilitate dispersal and use throughout current tolerance areas.

The Forest Service should modify desired condition FW-DC-WLBI-01 to read, [ldquo]Native bison have access to forage, security and movement corridors to facilitate wide-ranging distribution

and dispersal of the species to all suitable habitats within the plan area.[rdquo] In order for the Forest Service to achieve FW-DC-WLBI-01, the Forest Service should reconsider their Species of Conservation Concern (SCC) determination for bison based on the rationale we submitted in a joint letter (see attached).

As per the joint letter submitted in March of 2018, we urge the Forest Service to incorporate the following management recommendations into specific plan components, including Desired Conditions, Guidelines, Goals, and Standards, as part of the Forest Plan Revision Process:

* The forest plan should aim to improve utilization of expanded bison habitat, especially in the new west side tolerance area. This includes working with the Park Service and MFWP to identify areas outside the Park that

could serve as suitable winter and year- round habitat (taking into consideration private lands and inholdings) as well as identify the most likely migration corridors for bison to reach these areas from the Park.

- * The forest plan should direct the Forest to work closely with the Park, MFWP, and other IBMP partner agencies to assess options for how to effectively restore bison to suitable habitat areas throughout tolerance zones, and establish objectives to implement plan components to support such restoration.

- * The forest plan should commit to and prioritize (through plan components and other plan content) improving and maintaining potential habitat and corridor areas for bison through habitat improvement projects including: thinning, prescribed burns, meadow and aspen restoration, and restoration of native grass species and fertilization to enhance forage production.

- * The forest plan should encourage volunteer grazing allotment retirement, acquisition of private lands/conservation easement opportunities as those opportunities arise, and work with other jurisdictions and agencies to facilitate safe highway crossings for bison (and other wildlife).

Grizzly Bears

The draft plan formally adopts habitat standards from the Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem into the Custer Gallatin Forest Plan (Conservation Strategy). Desired conditions and guidelines for grizzlies focus on habitat inside the Primary Conservation Area (PCA), as outlined in the Conservation Strategy. While we understand the importance of coordinating with and referring to external management plans when managing for grizzly habitat inside the forest, the draft plan can and should go further than the Conservation Strategy especially since the delisting rule based on the Conservation Strategy was recently reversed. It is important that local forest and land managers utilize the best available science and manage grizzly bears in the most conservative way possible. While the final plan should take greater steps to manage the forest to conserve grizzly bears and promote genetic connectivity.

The CGNF manages land that is important for the connectivity of the Northern Continental Divide Ecosystem (NCDE) and the GYE populations. The CGNF should evaluate and implement management that promotes the movement of bears between the NCDE and the GYE, not only in the connectivity areas that land managers think that bears should move in, but also in

the connectivity areas that bears are currently utilizing. The recent ruling in *Crow Indian Tribe v. United States* found that [ldquo]The Service failed to logically support its conclusion that the current Greater Yellowstone population is not threatened by its isolation[rdquo].

The ruling in *Crow Indian Tribe v. United States* further admonished the U.S Fish and Wildlife service, [ldquo]Despite its recognition that continued isolation poses a threat to the Yellowstone grizzly, there is no regulatory mechanism in place to address the threat, only Montana's commitment to "manage discretionary mortality" between populations in order to "retain the opportunity for natural movements of bears between ecosystems."

The CGNF should evaluate and implement management that promotes the movement of bears between the GYE and the NCDE, not only in the connectivity areas that land managers think that bears should move, but in the connectivity areas that bears are currently utilizing. The CGNF can promote connectivity by evaluating opportunities to improve habitat security, reduce bear mortality, reduce human-bear conflict and reduce the impact that highways have on grizzly bear movement. NPCA recommends that the CGNF coordinate with the Helena-Lewis and Clark and the Beaverhead Deerlodge National Forests to ensure that there is consistent management throughout existing and potential migration corridors.

In order to facilitate connectivity between the two ecosystem populations, the Forest Service should modify desired condition FW-DC-WLBI-GB-02 to read, Outside the primary conservation area and recovery zone, grizzly bears occur where habitat is biologically suitable and social tolerance in connectivity corridors is increased.

Identify Potential/Priority Locations for Highway Crossings: In areas where the CGNF or other federal land managers manage land on both sides of an interstate or highway, studies should be undertaken in conjunction with Montana Department of Transportation (MDT) to identify the best locations for crossing structures. These highway crossings should be built to allow for grizzly bear passage and include approach habitat management standards to make it as easy and safe as possible for grizzlies to utilize the crossing structures.

Bear Attractants: The CGNF is necessary for the dispersal of grizzly bears across the GYE and should be managed in a way that facilitates connectivity. While the draft plan includes a standard that "[f]ood storage structures and management must be in place and all other factors resulting in potential detrimental impacts to grizzly bears will be mitigated as identified for developed sites other than temporary work camps," the final plan should incorporate more robust food storage requirements. Insufficient food storage protocol could result in increased bear-human conflicts, particularly in areas where forest users are not used to or expecting bears. One of the best ways to prevent grizzly bear/human conflict is to require the storage of any bear attractants in a secure way, which prevents grizzly bears from becoming habituated to humans and to potentially hazardous attractants. The CGNF should include attractant storage orders in the final plan for all areas within current or potential future grizzly habitat.

Habitat Replacement: The draft plan outlines guidelines for mitigating for permanent changes in secure habitat from roads, trails, and other developed features. Many guidelines require replacing habitat in the same subunit to account for lost habitat as a result of these features. The draft plan

provides that replacement habitat must be in place before project implementation or concurrent with project development. Guidelines also outline requirements that replacement habitat must be in place for ten years before it can be replaced. However, these guidelines do not limit the number of projects that can occur within a single subunit during a calendar year, and therefore do not limit the amount of habitat displacement or human disturbance within a subunit within a specific timeframe. The Forest Service should consider adding a standard to FW-STD-WLGB- 02, 03,04 that replacement projects within a subunit are limited on a calendar basis, to ensure long-term habitat stability for grizzlies.

Within the draft plan, there are no standards for habitat outside of the PCA, but the plan recognizes that bears move outside of the PCA to reach critical habitat and move across the broader ecosystem to reach bears in other regions and in other forests. The final plan should expand standards and guidelines to apply to all current and potential future habitat, inside and beyond the PCA, including habitat corridors to connect bears to other habitat. Establishing management guidelines for grizzly habitat across the CGNF will become critical as ecological disturbance and habitat alteration as a result of climate change, human activity, or other factors force bears to move into habitat beyond the PCA. The Forest Service should also include guidelines and standards that if the Conservation Strategy updates the PCA boundaries to reflect changes in grizzly habitat and movement, the plan will apply management to these new areas. By outlining and managing potential future grizzly habitat in the plan, using current bear movement data and models of predicted habitat, the plan can successfully designate, manage for, and ensure habitat for grizzlies over the long-term.

Conclusion

Thank you very much for the opportunity to comment on the draft plan. We appreciate the amount of time and work that goes into a forest plan revision and appreciate the hard work of you and your staff. We look forward to future involvement in the forest planning process. Please feel free to contact us with any questions or clarifications.