



Carbon County Resource Council
PO Box 1887, Red Lodge, MT 59068

June 5th, 2019

Mary Erickson, Forest Supervisor
Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130, Bozeman MT 59771

Re: Custer Gallatin National Forest Plan Revision

To the Forest Plan revision Team,

Carbon County Resource Council appreciates the opportunity to comment on the alternatives proposed for the Custer Gallatin National Forest Plan.

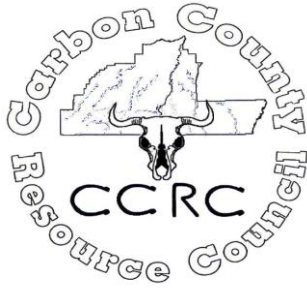
Carbon County Resource Council is a group of concerned citizens advocating responsible use of resources and finding solutions to problems that affect our unique Montana quality of life. We mobilize citizens to take action on critical issues facing our community and actively participate in the public process.

Carbon County Resource Council believes that clean air, clean water, and healthy ecosystems are of vital importance to the sustainable outdoor recreation and agricultural economies in Carbon County.

Carbon County Resource Council commends the Forest Service Revision Plan Team on their robust analysis of the challenges facing the Custer Gallatin National Forest and is in agreement with much of the direction of the draft Forest Plan. We recognize that the Custer Gallatin National Forest comprises many differing landscapes, encompassing many uses and interests. A common vision for the Custer Gallatin National Forest is therefore not easily settled upon. As Montanans we share an understanding that this forest is our national heritage and we look to pass along this heritage unimpaired to future generations. Therefore, Carbon County Resource Council is in support of Alternative D as the management plan for the Custer Gallatin National Forest.

Forest Wide Direction

We were pleased to see the Custer Gallatin National Forest acknowledge the influence of climate change, growing populations, and increased demands for access to outdoor recreation in the draft Environmental Impact Statement. Climate change, continued population growth and subsequent demands for open space and a variety of outdoor recreation activities are predicted to continue and intensify over the next 10-20 years and perhaps 30 year lifespan of the Plan. Effects of climate change are already being observed with increased temperatures, longer growing seasons,



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and earlier snow melt (2017 Montana Climate Assessment). Montana population centers, including Billings, are seeing significant increased population growth. The public's desire for open space, solitude, or simply a desire to get away from an urban environment is resulting in increased outdoor recreation uses. According to a recent report in High Country News, citing Headwaters Economics, 20.6 million people visit Montana's public lands and visitation to National Forests is 7.5 million, surpassing visitation to the National Parks and Bureau of Land Management Public lands. These social changes are influencing changes to Montana's economic base. Outdoor recreation tourism is now a dominant economic driver in Montana, second only to Agriculture. Traditional extractive industries associated with timber harvest, mining, and oil and gas development are no longer the economic drivers they once were, contributing less than 5 percent of the employment in Montana. Increased outdoor recreation uses on public lands and the National Forest in particular is placing additional stress on wildlife habitat through disturbance and fragmentation, road, trail, and campground infrastructure, and dispersed camping sites. For these reasons we believe Alternative D is the best choice for being responsive to these changes.

Alternative D, with an emphasis on maintaining resiliency of natural systems and ecological restoration is the alternative that is potentially most responsive to the changed and changing social/economic and ecological conditions affecting the Forest and areas around the Forest. Additionally, through proposed wilderness and backcountry areas it will protect large intact landscapes; maintains habitat connectivity; reduces soil disturbance on trails by restricting areas open to motorized and mechanized uses; places less emphasis on resource extraction; and designates recreation use areas.

Soils

Carbon County Resource Council believes that soil health is the basis of our ecological, social, and economic wellbeing. We appreciate the extent to which the draft Forest Plan describes the importance of soils and their relationship to the productivity and functionality of ecosystems. Alternative D accurately recognizes the importance of soil as an integral part of a functioning ecosystem (Chapter 2.3.3) by:

“providing nutrients for plant growth through their ability to allow air and water to enter through the soil surface and circulate down through the soil profile, the ability to store water for subsequent plant use while also allowing for the drainage of excess water, the ability to buffer soil pH and detoxify contaminants, ability to limit both wind or water erosion, and the ability to support beneficial soil micro-organism populations as well as macro- and micro-invertebrates.”



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The desired conditions, standards, and guidelines in Alternative D appropriately addresses impacts to soil productivity and mitigating soil disturbing activities for forested ecosystems and timber harvest activities.

Watershed, Aquatics and Riparian Ecosystems

Carbon County Resource Council believes that water quality and quantity are vital to a healthful environment, to our communities, and the economy of our State. Alternative D places the greatest emphasis on water quality and quantity as a result of the wilderness designations which will not allow mining or livestock grazing in watershed perimeters. Livestock grazing near watersheds can lead to trampled riverbeds, e-Coli contamination, and various other risks.

Carbon County Resource Council is in support of the revised "2.3.6 Riparian Management Zones" and Alternative D is our preferred WTR choice, which states, per decade, "complete 800 acres of lake, pond, and wetland restoration projects across the spectrum of montane and pine savanna habitats."

Energy, Minerals and Geologic Areas of Interest

Carbon County Resource Council recognizes that the Custer Gallatin National Forest is a diverse landscape that has many uses, encompassing multiple industries. One of those industries is oil and gas development. Carbon County Resource Council seeks to ensure that land, water, and air are protected in the face of oil and gas development and mining activities. Alternative D upholds the most protections for our land, water, and air in the face of oil and gas development.

Recreation Settings, Opportunities, and Access

The Custer Gallatin National Forest provides a variety of outdoor recreation activities, open space, opportunities to experience wilderness, and support diverse wildlife habitats. Outdoor recreation use is likely to increase with potential impacts to wildlife habitat and ground disturbance from motorized and mechanized recreation activities. Carbon County Resource Council supports the restriction of off highway vehicles (OHV's) present in Alternative D. Disturbance from OHV's can negatively impact plant and wildlife, soil health, and watershed quality. A 2006 survey of Montana's OHV registered owners conducted by the Montana Fish and Wildlife Department determined that 16% to 23% of OHV users are considered "Bad Apples"- meaning they don't abide by posted trails guidelines and rules. Given the increased popularity of OHVs and population growth, if even 10% of current OHV users are possible bad apples, this can result in significant damage to the integrity of the Custer Gallatin National Forest and sites of cultural significance. The Custer Gallatin National Forest is rich with cultural history, especially in the Pryor Mountains. The Pryor Mountain Range is culturally significant to the Crow Nation, whom continue to conduct ceremonies in the Pryor's. The Pryor's are popular with OVH enthusiasts in part as a result of their proximity to Billings. The restrictions present in Alternative D will help ensure that this culturally significant area is upheld and respected.



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Improvements to Alternative D

We believe Alternative D could be strengthened by placing additional emphasis on and prioritizing maintenance and restoration of ecosystem and habitat diversity in response to the changing climate and the concurrent effects of continued population growth and impacts of outdoor recreation. We would like to see:

- A higher priority placed on conservation and restoration of diverse wildlife and plant communities and associated habitats. Not just threatened and endangered species or species deemed to be at risk. Recognize and highlight wildlife and the associated diverse plant communities that comprise their habitats are an integral ecosystem component essential to maintenance of biodiversity and the resiliency of a functioning ecosystem. Wildlife associated habitats shouldn't be treated as simply another consumptive resource use.
- Recognize the importance of public lands, specifically the Custer Gallatin National Forest, to maintaining biodiversity in the face of declining wildlife populations and loss of habitat due to altering land use patterns and fragmentation. Specifically, declining bird populations dependent on grassland and shrubland ecosystems.
- In the spirit of an 'all lands' approach, better align management and restoration of wildlife habitat objectives with the State of Montana objectives for Species of Greatest Conservation Need and Community Types of Greatest Conservation Need (See Montana's State Wildlife Action Plan 2015).
- Alternative D doesn't address the importance of soil, along with biotic and hydrologic components, to functioning grassland and shrubland ecosystems (i.e. rangelands). To address this oversight we recommend the plan incorporate:
 - Maintenance and restoration of soil health as integral component to functioning grassland and shrubland ecosystems and their long term productivity as a desired condition.
 - The Final Plan guidelines and standards should incorporate a holistic approach to management and monitoring of soils in grassland and shrubland ecosystems by adopting and implementing indicators of rangeland health (National Research Council 1994, Pellant and others 2005). Rangeland health assessments appropriately recognize the relationship between soil, biotic (above ground and below ground), and hydrologic components important to a functioning ecosystem and should be incorporated as plan components for soils, grasslands, shrublands, and permitted livestock sections of the plan.
- Include a standard to establish baseline information on surface and ground water quality and quantity prior to permitting any new mineral or energy development activity.



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- Carbon County Resource Council believes that lands suitable for timber harvest should be tempered by other resource management objectives. We would like to see timber suitability determinations be presented in greater relation to the plan objectives for other resources, specifically those associated with wildlife and ecology.
- Finally Carbon County Resource Council believes in biological methods including targeted grazing for controlling noxious weeds. It is unclear why targeted grazing by goats and sheep is allowed after a risk assessment under Alternatives B, C, and E, but not allowed under Alternative D. We believe targeted grazing for controlling noxious weeds and other invasive plants should also be allowed under Alternative D contingent on completion of a risk assessment.

In conclusion, Carbon County Resource Council would again like to thank you for the opportunity to comments on the revision of the Custer Gallatin National Forest Plan. We look forward to further public participation in this process, so that the direction of the National Forest will be representative of all interests.

Respectfully,

A handwritten signature in cursive script that reads "Susan Beug".

Susan Beug
Carbon County Resource Council Chairwoman.