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Custer Gallatin Forest Plan (Comments)
Mary Erickson, Forest Supervisor
10 East Babcock (PO Box 130)
Bozeman, MT 59715

Dear Supervisor Erickson:

Please consider these comments when developing the Final Forest Plan Revision for the Custer Gallatin National Forest. I have read the draft revision, along with the Draft Environmental Impact Statement and Appendices in the formulation of these comments.

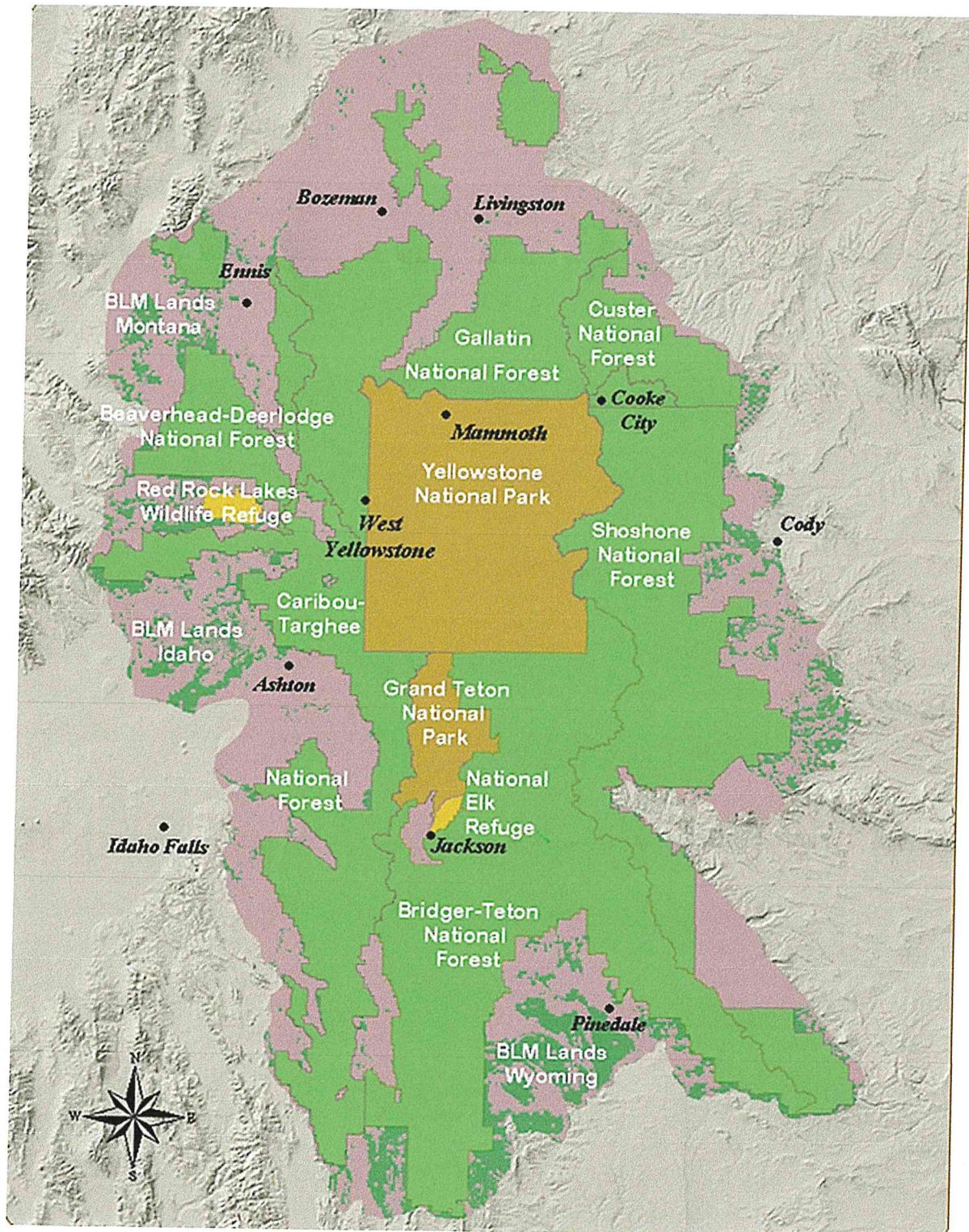
My background and insights on Forest Service operations and planning policy comes, in part from 10 seasons with the agency, beginning in 1957 on a back country primitive area survey crew (Sequoia National Forest) and continuing in a variety of programs plus four winter seasons at the RMRES in Fort Collins with the avalanche research and forecasting program. I also have six seasons with the National Park Service at Mount Rainier and Rocky Mountain National Parks. I have traveled extensively around the west and thus most national forests in all western regions. As a 30- year resident of Bozeman I am familiar with the montane portions of the CGNF and have visited the Pryor Mountains Geographic Area, but have no on-the-ground familiarity with the Ashland or Sioux Geographical Areas (GA). I have observed most meetings of the Custer-Gallatin Working Group since it's inception.

GENERAL COMMENTS:

Chapter 1 1.1 About the Custer Gallatin National Forest.

Please include in this Section the administrative and logistical support at the Supervisor's Office for the National Avalanche Center (NAC). The NAC provides guidance and support to National Forest-level avalanche centers and applicable military artillery programs in addition to field support and transfer of technical information and technology. One of the recipient forest level avalanche centers is specific to portions of the Custer Gallatin and is housed in an adjacent office. Additionally, the CGNF also provides administrative and logistical support to the Greater Yellowstone Coordinating Committee (GYCC) leadership which represents Forest Service, National Park Service, Bureau of Land Management and Fish and Wildlife presence within the Greater Yellowstone Area. The final Plan Revision should also include a statement on the legislation that was recently signed into law, restricting mining activities on Federal Lands in the Emigrant and Crevice Area portions of the Absaroka GA.

1.2 Purpose of this Land and Resources Management Plan indicates eight primary decisions that are to be made under the 2012 Planning Rule including “The plan area’s distinctive role within the larger landscape.” The GYCC Greater Yellowstone Area Map as follows:



The Geographic Areas depicted in the Draft Forest Plan Revision recognize the proximity to the Greater Yellowstone Area for the Madison, Gallatin, Bangtails, Bridger, Crazy and Absaroka Mountains. Portions depicted as the Pryor Mountains, Ashland and Sioux Geographic Areas are outside of the GYA and thus need not be managed in coordination with the GYA principles. Therefore, I am commenting that those Geographic Areas be managed though the elements of Proposed Alternative B. The remainder of the Revised Plan Geographic Areas are to be managed through modified elements of Alternative D., in order to be compatible with the objectives that that guide Management in the Greater Yellowstone Area.

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Specific comments

2.3.15 Wildlife.

Bighorn Sheep should be listed as a Species of Conservation Concern. I realize this is a decision made by the Region 1 director (Regional Forester) but supporting data is required from the forest level; thus, documentation as to the Forest Supervisor's consulting advice on this species should be provided in this plan revision. I recognize the policy that resulted in no domestic sheep or goat grazing allotments being active on the forest, but it appears that bighorn sheep populations are restricted to small bands mainly in the Gallatin and Madison GAs. Extensive sheep grazing on the adjacent Beaverhead NF precludes linkage to the west. Population numbers should be included, and herd distribution mapped in the Final Plan.

Bison: This species should be listed as a Species of Conservation Concern. The Desired Condition for Alt D. is that bison are present year-round with sufficient numbers and adequate distribution to provide a self-sustaining population on, and adjacent to, the Custer-Gallatin National Forest. Currently this is not the case; it will take additional time for the west-side population to naturally move to populate a broader landscape. Documentation justifying the absence of SCC recommendation should be provided. The guideline for Alternative D: "...to facilitate bison expansion into unoccupied, suitable habitat, management actions should not impede bison movement..." is especially noted.

Grizzly Bear: This currently Threatened Species is recognized for a long-term management goal of achieving successful dispersal between ecosystems, and ultimately increasing the genetic diversity and long-term health of grizzly bears inhabiting the CG National Forest. The NW boundary of the Grizzly Bear Recovery Area (of the GYA) incorporates a portion of the CGNF. If this species is removed from the Threatened list, it should to be determine a Species of Conservation Concern. The Grizzly Bear Recovery Area incorporates a portion the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA). To not recommend wilderness for this area, risks further conflicts with this threatened species. The recent meeting of the Interagency Grizzly Bear Committee emphasized reducing conflicts; yet the Gallatin Forest

Partnership Proposal which is contained in Alternative C removes this very area from the Wilderness protection, which further jeopardizes this species. Alternative C is unacceptable.

2.4.12 Airfields. The prohibition of backcountry airfields is supported. However, there could be some statement to the effect that utilization of helicopters is appropriate for search and rescue (evacuation or recovery) on the forest with authorization on an incident basis, in coordination with the helicopter provider and county sheriff.

ALTERNATIVE D - "Alternative D was developed to address comments and themes of emphasizing natural processes and restoration." Alternative D most closely follows the 2012 Planning Rule direction (Under 1.2 Purpose of this Land and Resource Management Plan) "The plan area's distinctive role and contributions within the broader landscape." The elements of Alternative D will determine "Project or activity decisions will need to be made following appropriate procedures." Crucial to the integrity of the Greater Yellowstone Area is the matter of connectivity is contained in the statement made in the DEIS under 3.10.6 – Connectivity. "The 2012 Planning Rule requires that the plan must include components to maintain or restore connectivity." Alternative D is best formulated to fulfill that obligation. (My contentions in addition to the Planning Rule, are informed by Schlenker, K. 2003 and Craighead, F.L., 2015. The latter reference was apparently not utilized in determining the value of the HPBH in the WSA.) This principal is accomplished in the Madison and Gallatin Mountain GAs though recommended Wilderness Areas as identified in Alt. D. with the following caveats:

1. That the proposed Wilderness for the Gallatin Range should be modified on the north boundary so that the Bozeman Ice Festival can continue to be permitted. This will cherry-stem the boundary approximately 1.5 miles south, and adjacent to Hyalite Creek trailhead. This suggested exclusion is not critical to the integrity of the proposed Gallatin Range Wilderness Area and consists mostly of vertical cliff topography. Motorized access restrictions will be continued.
2. That Buck Creek, Cabin Creek North and South areas be reclassified as semi-primitive motorized to compensate for the loss of motorized access were the Gallatin Range Wilderness Area under alternative D, be enacted by Congress. Motorized access is currently ongoing or adjacent to this area which is adjacent to the private lands of Big Sky, Spanish Peak and Yellowstone Club developments. This provision will concentrate motorized use west of Hy. 191 rather than dispersing such use into the Gallatin Range which would compromise its connectivity and landscape area contribution to the GYE.
3. That the Bridger, Bangtail and Crazy Mountains GA Alt. D. proposed wilderness areas should be reexamined and changed to Backcountry Areas. These proposals do not qualify as suitable under the 1964 Wilderness Act due to the proximity of private lands through checkboard fragmentations which unlikely to be acquired and impacts to solitude by adjacent or currently permitted motorized use. The suitability of the West Bridger Range is in question due to its proximity to developed private lands, the presence of motorized access, and noise from the incoming west bound flight path to the Bozeman Airport. The designation of Backcountry Area

for the West Bridger Range will also preserve the Bridger Ridge Run event which has a 35-year history and is nationally recognized.

4. The Absaroka Mountains GA is described (3.5.3 Vision for the Absaroka Beartooth Mountains Geographic Area) as "Largely wilderness and part of the greater Yellowstone ecosystem provides outstanding opportunities for solitude, primitive recreation, and a diversity of wildlife species." Much of this area was once part of the Custer National Forest. Additionally, "...one of the world's few platinum and palladium mines exists on this landscape." I am familiar with the area peripheral to the AB Wilderness Area but not the designated area itself except at it's eastern boundary adjacent to the Beartooth Highway. I have visited both the east and west components of the Stillwater Mining Complex. On page 859, of the Draft EIS under effects of Alt D, there would be no Stillwater Land Allocation min. "Even without the land allocation, mining is expected to continue in this area." This use is, under provisions of the 1872 Mining Law, incompatible with Wilderness desired conditions. This impacts the Deer Creek proposed wilderness which should be withdrawn from consideration under Alternative D. The uncertainty should be recognized, and this area reconsidered for allocation in the next planning cycle.

Our conclusions are to recommend the 3 eastern-most Geographic Areas be managed under the proposed Alternative B and that the remainder of the Custer-Gallatin National Forest be managed under a suggested modified Alternative D.

Sincerely,
 

Don Bachman and Cathy Cripps, PhD

(submitted by mail and through the CGNF website)