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Comments:

Comment draft plan - CGNF

May 12, 2019

Forest Plan Revision Team

PO Box 130

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Dear Revision Team,

The Custer Gallatin National Forest's Draft Management Plan addresses management of areas that include gateway areas to Yellowstone National Park, portions of the Greater Yellowstone Ecosystem, and several wilderness areas, all of which I have visited at various times for recreation and renewal and professionally as a geologist. As increasingly larger numbers of people are drawn to the Custer Gallatin NF for seasonal and year-round living and recreation, the natural environment is suffering greater and greater impact and degradation. Additionally, climate change is putting increased stress on the ecosystems and biota of the area, and this greatly increase the human impacts.

My comments apply to the entire area covered by the national forest, but specifically, I am commenting on the Absaroka-Beartooth Wilderness and the geographic areas encompassed by the Madison, Henrys Lake, and Gallatin mountain ranges. The headwater streams provide clean drinking water and provide shelter to spawning trout. The NF provides critical habitat to and migration routes for grizzlies, bighorn sheep, elk, wolves, and an incredibly diverse biota.

It is critical that the new management plan get ahead of the threats posed by the climate change crisis, increased recreational impact, and fire suppression. It is also critical that the new management plan use the latest and best science and techniques in its design. Thus, it comes at a critical time and can serve to implement strategies to better understand and adapt to a changing climate, protect wildlife populations and ecosystems, and cement our recreation footprint in place,.

I support the full incorporation of the Gallatin Forest Partnership (GFP) Agreement into the plan for the Gallatin and Madison ranges. However, while the draft plan's Alternative C incorporates parts of

that agreement, it does not accurately reflect the GFP's recommendations for wildlife protections or recreation monitoring. Looking outside the GFP agreement, it is also critical that we protect and enhance other areas, including wildlife linkage areas and existing wilderness, include enforceable climate change components, and facilitating the return of natural fire cycles.

Consequently, I strongly recommend all of the following revisions be made to the draft plan:

1. Ensure wildlife connectivity in portions of the Madison, Henrys Lake, and Gallatin Geographic Area that aren't otherwise protected by the grizzly bear recovery zone. The Madisons are critical for wildlife movement to areas beyond the National Forest.
2. Habitat protections for grizzly bears must extend wherever population health is monitored and into areas important for connectivity. Grizzlies must also be designated as a Species of Conservation Concern.
3. Plan components must support a year-round self-sustaining bison population within tolerance areas on National Forest System lands.
4. West Pine and Porcupine Buffalo Horn backcountry areas must mirror Cabin Creek Wildlife Management Area in wildlife protection and wild character plan components.
5. Recreational use must be balanced with wildlife protection and, therefore, monitored more extensively by area. Standards must ensure that increasing recreation is carefully monitored with this balance in mind.
6. Existing wilderness areas must be managed in line with the 2020 Vision.
7. Given the uncertainties of climate change, monitoring questions for vegetation, invasive species, aquatic resources, fire, and more must explicitly assess the effects of climate change and guide adaptive management as required by the 2012 planning rule (219.12(a)(5)(vi)).
8. In addition to the 30 rivers recommended as eligible for Wild and Scenic designation, the plan must include Taylor Creek, Hellroaring Creek, and the South Fork of the Madison due to their outstanding wildlife values.

I am excited to see the Custer Gallatin National Forest taking a fresh look at our ecosystems and the many species that depend on them as well as the ways in which current management policies are inadequate. The Draft Plan and DEIS includes many strong points, and with some revisions the new management plan will be an important tool to guide decades of sustainable forest management. Thank you for your work on this important issue.

Thank you for the opportunity to comment on The Custer Gallatin National Forest's Draft Management Plan.

Respectfully,

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