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Comments:

I have attached a document with my comments. Thank you for giving me the opportunity to share my thoughts.

Grammatical/Arithmetical Comments

FW-DC-ROS Table 18--The numbers in the Summer Percent of Forest column for Alternative B and Alternative E are identical. Could this be an error?

FW-STD-DWA 12--"To protect wilderness character..." sounds very awkward. Is this misstated, or perhaps a phrase or word was left out?

2.4.38 Inventoried Roadless Areas (IRA)

Introduction

Duplication--"...prohibitions and permissions on road construction, road construction, and timber harvesting..."

2.4.43 National Recreation Trails (NRT)

Introduction "There are a total of 73 miles of existing national recreation trails on the CG national Forest." Table 26 then reports over 120 miles. Somebody's arithmetic is off.

2.4.46 Backcountry Areas (BCA)

Introduction

Duplicatoin--"Backcountry areas are generally undeveloped or lightly developed. They are either are unroaded, or have few, primitive roads."

3.7.4 Designated Areas

Table 62--The Percent of GA represented by designated areas totals 100.4%. This is not possible. Somebody's arithmetic is off, since obviously all of the geographic area is not going to be designated.

Comments on Plan Content

2.3.5 Watershed and Aquatics (WTR)

Objectives

01 Alternative E

200 miles of stream restoration per decade is grossly inadequate, given the thousands of miles of streams in the CG Forest.

I also suggest in the final plan specifying a percentage such that all of the deficient stream issues will be addressed within a decade. "Per decade, 10% of the existing deficiencies in streams and springs will be restored."

02 Alternative E

Similarly, 1-3 stream crossing structures per decade is not adequately protecting the resource, which is Job 1.

03 Alternative E

1-3 at-risk species projects is also not adequate resource protection, your primary management goal.

2.3.10 Forested Vegetation (VEGF)

The Plan does not but should include at least a mention of planning for the arrival of the Emerald Ash Borer in the Ash Forest of Eastern Montana.

Objectives

FW-OBJ-VEGF 01 Alternative E is grossly inadequate to protect the resource.

2.3.15 Wildlife (WL)

NOTE: Although not included on the Endangered Species List, amphibians as a whole are threatened across America, including the CG Forest. They are also an important indicator species for overall Forest health. Climate change is likely to impact amphibians in the CG Forest, adding to their difficulties. I would recommend including specific mention of amphibians in the Plan, in addition to the postage stamp animals.

Objectives

FW-OBJ-WL 01 Alternative E is grossly inadequate to protect the resource.

FW-OBJ-WL 02 Alternative E is grossly inadequate to protect the resource.

Guidelines

FW-GDL-WL These guidelines are a critical component of the Forest Plan and are absent from Alternative E. This is another example of how Alternative E is grossly inadequate in protecting the resource.

2.4.5 Grazing (GRAZ)

NOTE: Current management of domestic sheep in the CG Forest is too permissive, allowing excessive risk to the fragile and threatened area Big Horn population. Most wild sheep herds are small and either stable or declining in number. Attempts to expand wild sheep use of the forest through reintroduction have met with generally disappointing results. Absolute exclusion as in Alternative D is not required, but a more critical review of permitting and greater weight to protecting the vulnerable wild sheep population is warranted.

Standards

FW-STD-GRAZ 02 As noted, Alternative D is unnecessarily restrictive.

03 Alternatives B, C, E This is well said and very appropriate.

2.4.10 Roads and Timber

FW-OBJ-RT 03 Alternative E. Removal of only 5 to 20 miles of unneeded system roads is grossly inadequate, given the hundreds of miles of unneeded system roads.

FW-OBJ-RT 03I suggest this be expressed in terms of a percent of unneeded roads, rather than a raw number of miles. "Remove 10% of unneeded system roads each year" will eventually get on top of the problem.

2.4.15 General Recreation

Objectives

FW-OBJ-REC 01 I applaud the foresight evidenced here. Good idea, good to get ahead of it.

2.4.17 Primitive Recreation (ROSP)

Objectives

NOTE: The definition of "motorized incursion" is unclear and not covered in the glossary. I am responding as if I understand this term, but there's a good chance I don't.

FW-OBJ-ROSP 02 None of the Alternatives includes sufficient elimination of unauthorized motorized incursions. This is a violation of the law. We understand that law enforcement is a huge challenge for the CG

Forest, but after all the time and effort spent on developing the Forest Plan, and the upcoming Travel Plan, enforcing the end product is more deserving than this limited effort.

2.4.28 Recreation Events (RECEVENTS)

In the era of reality TV and in our community full of top level outdoor athletes, these types of events may be popular, but in truth, they are totally incompatible with the wilderness ethic, and the Wilderness Act. There is no place for competitive events or festivals or whatever in designated Wilderness or Wilderness Study Areas.

2.4.33 Emerging Recreational Technologies (RECTECH)

I heartily commend the staff for their foresight in including this section. However, this section should more completely spell out the value of soil, water, and wildlife, and make a much stronger statement in protection of the forest resources.

2.4.36 Designated Wilderness (DWA)

Desired Conditions

FW-DC-DWA 10 "User-created trails are not dominant on the landscape" is weak. How about "User-created trails are not permitted to persist on the landscape"?

FW-DC-DWA 14 "Lands degraded prior to wilderness designation, such (as) old gravel quarries, mine exploratory sites, and weed invested areas, function naturally" is passive and weak. How about "...shall be allowed to return to a natural state, and where possible, USFS actions shall encourage/promote/enhance this return"?

Objectives

FW-OBJ-DWA 01 Once again, I recommend a percentage value, such as "Per 5 years, remove 30% of facilities deemed inconsistent with Wilderness designation." That way, eventually the whole job will get done.

2.4.44 Eligible Wild and Scenic Rivers (EWSR)

Water is a critical resource and affects all aspect of forest resources. I suggest, "ALL moving watercourses within the boundaries of the Custer-Gallatin National Forest are suitable for designation in one of the categories of Wild and Scenic, except (fill in up to 20 miles of effluent ditch). The USFS will recommend all of these waters be designated as such by Congress." Be Bold, Protect the Resource!

3.4 Pryor Mountains Geographic Area

Distinctive Roles and Contributions

The Pryor Mountains are an intersectional geographic region and will be hard hit by climate change. Climate change was not addressed anywhere in the Plan. Leaving this out is a gross deficiency.

Forest Plan Land Allocations

Table 43 Alternatives B, C, and E almost no Wilderness designation, and this is a deficiency. More land is suitable and should be designated. Backcountry Area designation allows too many opportunities to degrade the resource in this special and fragile area.

Recreation Opportunity Spectrum

Table 45 Alternatives C and D are clearly preferred as they more appropriately and adequately protect this very special and fragile area.

Lands Suitable for Timber Production

The highest management priorities in the Pryors are cultural and research/education, with recreation a secondary priority. Timber harvest is directly contrary to managing for educational value. Therefore, timber harvest in the Pryors should only be conducted to rectify problems, and not as a routine economic activity.

Goals

PR-GO-VEGNF The Pryors must be managed primarily for cultural and research/education, which require an enhanced level of resource preservation.

3.5.4 Forest Plan Land Allocations

Eligible Wild and Scenic Rivers

Table 50 Every inch of water in this Forest should be recommended for Wild and Scenic Designation, except where already degraded by mining, and in that case the mine should be made to clean it up.

3.5.7 Plan Components-Stillwater Complex (SWC)

Suggest adding 03, "Nevertheless, Mining activity will not be allowed to degrade the resource quality of the surrounding forest." Be Bold, Protect the Resource!

3.5.10 Plan Components-Bad Canyon Backcountry Areas (BCBCA)

Suitability

PR-SUIT-BCBCA 01 The listed suitabilities for Alternative B and Alternative C seem backwards to their basic intent. Are these correct?

3.6.5 Forest Plan Land Allocations

Table 56 With 129,000 Roadless Acres, there MUST be some areas worth protecting with either W wilderness or Primitive designation. Backcountry designation allows too much resource degrading activity.

3.6.8 Plan Components-Land Status and Ownership (LAND)

BC-GO-LAND 01 "The Forest Service will work with willing landowners and partners to consolidate ownership and acquire access in the Crazy Mountains Geographic Area" is a well worded, supportable statement. However, it is incomplete. Suggest adding 02 "The Forest Service will continue to protect historic access to system lands in this region."

3.6.10 Blacktail Peak Backcountry Area

Where is this located?

3.6.11 West Bridgers Backcountry Area

I understand the concept of "West Bridgers", but where EXACTLY is this located? Why? What are the alternatives? Given the proximity to Bozeman and the intensive use the West Bridgers receive, this topic deserves far more coverage.

3.6.12 Crazy Mountain Backcountry Area

Where is this Area located? These three Backcountry Areas need more coverage and specificity in this Plan.

3.7.9 Plan Components-Wilderness Study Areas

Goals

MG-GO-WSA 01 This is excellent on two fronts. First, it's terrific that you will work together with MT FWP. Second, it's terrific that the needs of wildlife in this extraordinarily critical area will be enhanced. This portion of the CG Forest is extremely dense with scarce wildlife and is the main corridor for migration of these species from Yellowstone all the way to Glacier. Kudos!

3.7.13 Plan Components-Hyalite (HREA)

Desired Conditions

MG-DC-HREA 02 "Alternative transportation plays a role in providing convenient and sustainable public access." What does this mean? It sounds nice, but it really doesn't SAY anything. Be Bold, Protect the Resource!

Chapter 4 Monitoring Plan

Excellent! The best plan is worthless without a strategy to find out if it's working. I admit I am unable to understand much of the details in the monitoring program, but trust the capable USFS staff to make sense of it. I applaud you for including this in the Forest Plan.

Summary Comments

1. Resource Protection is the Prime Directive for the USFS. Alternative E is an extreme position and grossly fails to protect the resources of the CG Forest. This Alternative is totally unacceptable.

2. Water is the life blood of the forest, its resident lifeforms, and of the people who live downstream. All members of the Gallatin Community Collaborative, regardless of user category, agreed that protecting the environment was a critical goal in forest management. A very high level of watershed protection must therefore be included in the final Forest Plan, regardless of which Alternative is chosen.

Wild and Scenic River designation has a minimal impact on forest use. The CG National Forest is one of the wildest and most pristine national forests in America and every inch of every stream in the Forest qualifies for some level of WSR designation. The CG Forest should recommend that all waters in the forest receive official designation under the WSR Act.

3. As table 67 clearly indicates, all of the Alternatives under consideration share a similar volume of timber harvest. As a result, the timber industry should have no objection to any of them.

4. Backcountry Areas may be a desirable concept for forest managers due to their flexibility. The net result of their inclusion, however, is that in 3 of the Alternatives (B, C, E) there are far too many acres of roadless and wild land that become categorized as semi-primitive, with attendant development potential, intrusions and degradation, and without sufficient preservation of their wild character. Primitive areas are underrepresented. The Plan, or an attached explanatory note, should also include more detail about the precise location and justification for creating such areas.

5. Over the years of the Gallatin Community Collaborative and through the work of the Gallatin Forest Partners, I have come to appreciate and respect people who use the forest differently. They are good people who love the forest, too. There are also forest 'owners' and users who aren't local people but still need to be considered--the forest belongs to all Americans.

Alternative D is most appealing to me personally. However, Alternative C is the proposal that best reflects and respects the desires of the broad community of forest users, while still protecting the underlying resource. Alternative C has the best balance and is the one I support.

Thank you for the opportunity to share my thoughts. You have done heroic work here and I appreciate it. And all of you.

Dean Center