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Comments:

I am pleased to see that the forest management plan considers ecosystem services, and prioritizes providing them sustainably. The plan acknowledges the need to consider interconnection within ecosystems (such as between vegetation, water, and individual species), and to ensure sustainability at the level of whole systems. The plan also acknowledges trade-offs that must be made between different uses and values. Overall, it seems to be thoughtful and beneficial.

The suggested alternatives do not typically reflect particular trade offs. Throughout, alternative D represents stronger conservation and protection efforts, E represents less conservation effort and more resource exploitation and access, and B and C are intermediate. This applies both to active programs that are proposed to pursue conservation goals (with alternative D suggesting the most programs, and E the least) and also to restrictions on activities that may harm the ecosystem or remove resources (in these cases D suggests stronger restrictions, and E weaker ones). As a result of this consistency in the alternatives, practical choices about which trade-offs to make will depend on choosing from different alternatives in different areas of the plan. Such trade-offs will be necessary.

I favor a strong bias towards conservation and sustainability, but this does not mean I consistently favor alternative D. Since the forest service has limited resources, consistently choosing to undertake more programs in every area is not practical, and will not lead to good outcomes.

In my opinion, the most important value of the Custer Gallatin is that it is a large, mostly intact natural system. These systems are often self healing. In many cases they will generate value over time, in the form of ecosystem services and renewal of resources such as timber and biodiversity simply by being left sufficiently undisturbed. Consequently, my suggestion is to favor the strictest alternative (D) in cases where this minimizes human impact, such as decommissioning roads, disallowing air strips, and minimizing disturbance from timber removal. These protections are likely to prove more valuable, and also have less direct cost to the forest service, than more active programs. In most cases, the plan specifies the goal of active conservation programs, but not their implementation, so there is no way to judge whether the individual programs are good. Active programs need to be chosen carefully, both due to limited resources and because any intervention can have unintended consequences. In my opinion, the active programs to prioritise are ones focused on quality and connectedness of habitat and water systems, with a secondary focus on remediations of acute damage.

When balancing mixed uses, it is worth considering where else the associated needs could be met. There are many sources of plant fiber outside of national forests. There are few remaining large intact ecosystems. Thus ecosystem services, sacred sites, and preservation of biodiversity are more unique products of the Custer Gallatin than timber is. That is not to say that timber harvest should never occur, but it should be considered less rare, and thus less precious, in cases where these values come into conflict.

I believe that new oil, gas, and coal exploration and extraction should be prevented entirely, without exception. The best available science is clear on this topic. Even consuming our existing proven reserves of fossil fuels (to say nothing of finding new sources) would result in catastrophic changes to the whole-earth ecosystem. There is no path to a prosperous and sustainable future that contains any room for new fossil fuel development whatever. Our national forests can contribute energy as one of their many values, but this must be renewable, carbon-neutral energy.

Thank you for accepting public comment, and for the hard work and careful thought that is evident in your draft management plan.