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Comments on the CGNF Forest Plan

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Thank you for the opportunity to respond to the draft of the revised Forest Plan of the Custer Gallatin National Forest. My main interest is in the Greater Yellowstone Ecosystem , so I will not comment on other areas of the CGNF.

In the mid-1970s I was Involved with Sen. Metcalf and his capable staff in advocating for the creation of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area. In 1980, my wife, Mary Lee, and I were hired to create the new Yellowstone Institute in Yellowstone National Park. During that five year period we lived each season at the Buffalo Ranch in the Lamar Valley with dozens of biologists, botanists, wildlife specialists, geologists and others, and quickly advanced our learning curves in association with these amazing men and women. In 1981 we became intensely interested in the concept of a Greater Yellowstone Ecosystem and in 1982 became principle founders of the Greater Yellowstone Coalition where I served three years as the first president of that organization. It was during these years that we developed a deeper understanding of the remarkable biological significance of the area encompassed by the relatively new HPBH WSA .

In 2015, the Lee and Donna Metcalf Foundation funded a study by Lance Craighead entitled *Wilderness, Wildlife and Ecological Values of the Hyalite/Porcupine /Buffalo Horn Wilderness Study Area* . The completed study was publically introduced in the Fall of 2015 to a standing –room- only audience at the Bozeman Public Library. The day after the library event, the Bozeman Daily Chronicle did a full page color article on the event. (A copy of this document was previously sent to the CGNF and a second copy will be delivered by hand to the CGNF on June 5, 2019, along with a typewritten copy of an earlier letter sent by Craighead to the CGNF.)

But while the Craighead report is arguably one of the most comprehensive compilations of the remarkable biological values of the area, it was not included in the official CGNF “Literature Sited” section of the *Draft EIS for the Revised Forest Plan, CGNF V-1*. I have been told that the Craighead study was not cited because his work was not “peer reviewed.” This was not an accurate statement. Craighead’s report is a compilation of “peer reviewed” research by other researchers, not new research by Craighead. For this reason, I request the Craighead study should indeed be on the Forest Service list of “Cited literature” and that it be done now.

Much has changed in forest planning since in the 30 or so years since what was then the Gallatin NF plan. Many of these changes in recent years have enhanced planning in major ways including the 2012 planning rules and the requirement that “best available” science shall be utilized by the agency. I look forward to following the Forest planning activity as these and other relatively new policies are fully implemented. I also suggest that the Craighead study be reviewed by the CGNF to determine the extent, the omission of the Craighead study may have had on any aspect of the DEIS or the draft Revised Forest Plan completed and published in March, 2019.

One concern I have as we go forward into planning for the HPBH WSA, is the issue of monitoring and the need for rapid agency response as issues arise. For those of us who have witnessed the degrading of the HPBH through illegal use during many years, we have to question if the agency will have the staff and the resources to fulfill that monitoring. The agency has failed in this task a number of times in the past 35 years (e.g. in the case of motorized and mechanized trespass) and once it occurs, it is difficult to remedy.

Finally, as I mentioned earlier, I am particularly interested in the HPBH WSA but am confused by how the CGNF computes the total acreages of each of the four Alternatives. Alternative D, for example, shows 144,000 acres, but the existing HPBH WSA alone is 155,000 acres. Does this mean there would be 144,000 acres plus the existing 155,000 acres in the existing WSA? If not, what would be the acreage of the existing WSA under Alternative A and the other three Alternatives? I would appreciate it if someone from the CGNF could advise me via e-mail about this question. rickjefe.rr@gmail.com


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With Attachment: *Wilderness, Wildlife and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area* by Frank Lance Craighead, September 2015