



*Mission "Building on the tradition of special interest in birds, Yellowstone Valley Audubon Society is organized to promote enjoyment and protection of the natural environment through education, activism, and conservation of bird habitat."*

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PO Box 1075, Billings MT 59103

June 6, 2019

Custer Gallatin National Forest (CGNF)

Attn: Forest Plan Revision Team

P.O. Box 130, (10 E Babcock)

Bozeman, MT 59771

To: Custer Gallatin National Forest, Forest Plan Revision Team

Yellowstone Valley Audubon Society (about 350 members with a Board of Directors of 11 current members) submits the following comments concerning the Draft Revised Forest Plan (Plan) and related Draft EIS (EIS) for the CGNF. Thank you all at the CGNF and US Forest Service for your careful and prudent work on this plan and for your consideration of our comments.

The world's population has doubled in the last 50 years. Use of all public lands has dramatically increased over that time and especially in the last 10 years. Public land use is not likely to diminish in the foreseeable future. Acreage and availability of public land is not likely to substantially increase. The Custer Gallatin National Forest (CGNF) is a significant component of public lands and is not exempt from the above realities.

Careful and well planned management of the CGNF is of critical importance to local and regional ecology, to all Americans, and to visitors to the USA.

All Alternatives and options that include Wilderness designations within the CGNF and specifically the Pryor Mountains are very preferable to no such designations.

Necessary attention to watersheds, ecosystems and ecological integrity, and human use seems well represented and science-based in the Plan and the EIS, at least for the most part.

Some specific suggestions:

Opportunity for quiet and solitude within the CGNF is of great importance. Motor uses within CGNF invariably have a negative impact on quiet and solitude, quiet and solitude per se have no means of direct impact on motor uses. While multiple uses and users are a given circumstance within CGNF sacrificing quiet and solitude to noise from motors should not be allowed beyond some very reasonable and realistic limits: distancing motorized use roads and trails such that ample areas are available for quiet enjoyment; implement a forest-wide ban on motors that exceed a low noise standard - e.g. 60 decibels (db) at 50 feet; further restrict use and db limits of generators, chain saws etc. within campgrounds and camping areas; ban use of drones within the CGNF.

Given our points, concerns and comments, and all considerations within the Plan and EIS YVAS favors the CGNF Alternatives in the following order:

Alternative D

Alternative B/ C

We do not support Alternative E as written.

We suggest that some restructuring of details and acreages might be available to create another Alternative balanced between Alternative D and B/C. (e.g. some compromise in wilderness area acreages noted in these 3 current Alternatives; targeted grazing by domestic sheep or goats for weed control).

We understand that this YVAS submittal is short and of minimal specification especially as compared to the nearly 1200 pages contained in the Plan and the EIS. We believe that our position is nonetheless clear -

It is of paramount importance to manage the CGNF:

Using science-based, legitimate and intelligent stewardship;

Acknowledging and implementing best available technology and policies to protect and enhance good ecological integrity of CGNF and adjacent lands and waters;

Continually, carefully and justly balancing one set of user's impacts with respect and preservation of other user's values and rights;

Protecting and enhancing native flora, animals, watersheds, soils and natural self-sustaining conditions;

Recognizing that human population and use of technologies, and human use within the CGNF, is at an all-time high and will almost certainly increase significantly in the years subsequent to implementation of any new CGNF Forest Plan. Incorporate that unavoidable dynamic into this Planning Process, give it serious consideration and management importance within the priorities noted above.

Thank you for your thoughtful and diligent work.

We hope to be closely involved as the Draft Plan progresses.

We also look forward to being directly involved in stewardship work and management efforts in the CGNF.

Sincerely,

*Steve Regele*

Stephen M. Regele, President

On behalf of the Board of Directors and Membership

Yellowstone Valley Audubon Society

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