

THE CUSTER-GALLATIN FOREST PLAN

Comments by John Shellenberger, Bozeman, MT.

The Gallatin Forest Plan is nearing completion. The Forest Service has offered a Draft Plan to the public for comment.

There will be an abundance of comments, but I am hopeful the Custer-Gallatin will not render the Final Plan based on political consideration but on the scientific evidence of what is best for sustaining the future of the forest. Humans can only intrude on the natural character of the forest. So little natural forest remains in the United States, even in the West, that the Custer-Gallatin will be best served by allowing it to remain as undisturbed as possible.

The Draft Plan describes several potential uses for the mountains and forests of the Custer-Gallatin: Wilderness, Wildlife, Recreation, Timber and Mineral Extraction. It does not, however, prioritize any particular uses. For the most part, these uses are contradictory and competitive. The tendency will be to attempt to satisfy all interests by providing for a “balanced” plan, as has been done in so many other places. Although sacrifices tend to be made all around, no one interest is satisfied, and no clear objectives are achieved. May I suggest that prioritization is in order?

The Custer-Gallatin is a unique system of forests and plains, stretching from its western boundary demarcated by the Madison River, east to Montana’s border region with South Dakota. This area is sacred to the indigenous people of the area: the Crow, the Northern Cheyenne, the Gros Ventre and others. They have asked the Forest Service to respect their need for quiet wilderness. Since Indian tribes have been so terribly treated in the past, and much of their historic lands have been confiscated, maximizing the wilderness use of southern Montana for tribal use seems to be an appropriate next step in redeeming the past.

Another reason the mountains north of Yellowstone should retain their wilderness character is their continual use by wildlife, a marvelous habitat as well as a pathway to connect the Greater Yellowstone Ecosystem with the Northern Continental Divide Ecosystem and the Crown of the Continent. The Gallatin Range is **a unique wilderness corridor** in the West for wildlife habitat and movement along a north-south axis. It needs protection from mechanized use that would intimidate wildlife and introduce exotic and invasive plants. Changes in the flora and fauna of the Gallatin will result in coming years from global warming – and do not need to be exacerbated by further human intervention with mechanized equipment.

Perhaps the most important reason to preserve the Wilderness character of the Gallatin Range is its potential for being a major fairly direct wildlife corridor connecting the Greater Yellowstone Ecosystem with the Northern Continental Divide Ecosystem. Steve Bullock, the Governor of Montana, MDT director Mike Toomey and FWP Director Martha Williams spoke to a conference in December and committed themselves to seeking **safe passage routes** for wildlife crossings of major highways. Interstate 90 east of Bozeman is perhaps the most important of these places where an overcrossing would prevent highway/wildlife collisions and enable the connectivity between wildlands that we seek. By supporting the Gallatin Range as Wilderness, CGNF would be promoting that very important objective.

The Custer-Gallatin National Forest, in its Environmental Impact Statement, commits itself to the maintenance of wildlife diversity in the Gallatin. The following species of wild mammals, native to the Custer-Gallatin National Forest, are listed as “of concern” by the Montana Natural Heritage Program.

The 2015 Montana Fish, Wildlife & Parks State Wildlife Action Plan “adopts all of the following species as “of concern”. In other places, the Forest Service identifies Region 1 Sensitive species but they are ignored in the Draft Plan itself. .

The following species of wild mammals, native to the Custer-Gallatin Forest, are listed as “of concern” by the Montana Natural Heritage Program. The 2015 Montana Fish, Wildlife & Parks State Wildlife Action Plan adopts” all these species although it emphasizes only S1 and S2 species due to limited resources. Species with an asterisk (*) are listed by the Forest Service as Region 1 Sensitive species (2011).

White-tailed Prairie dog*	Bison
Black-tailed prairie dog*	Lynx
Fisher*	Swift Fox
Black-footed Ferret*	Grizzly Bear

To that list, we would add **Bighorn Sheep** and the **Gray Wolf** as deserving of consideration and protection in order to provide a completely diverse ecosystem in the Gallatin Range. In its draft statement, the Forest Service appears to both acknowledge this and to overlook it. Bighorn Sheep are found currently only in small herds (approximately 40 animals) that are sustainable in the long term. Herd populations of at least 500 members are important and habitat needs to be available to accommodate them. The Gray Wolf seems to be sustaining itself in Yellowstone but is subject to being hunted and shot outside of Park borders. Wilderness habitat is important for the wolf to survive and persist.

The Custer-Gallatin Forest Plan is an important document that will guide planning for the forest for years to come. It is important that we get it right. If uses are allowed that will diminish the integrity of the Forest, it will be lost forever. Of all the Wildlife Corridors currently existing in the United States, this corridor through the Gallatin Range is probably the most important. Reflecting this perspective, there is currently a bill before Congress that would establish Border to Border connectivity for wildlife in this very Region. The CGNF can give encouragement to this idea by giving the highest priority to Wilderness.

Sincerely yours,

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