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Comments:

Thank you for the opportunity to comment on the Custer Gallatin Forest Plan Revision #50185. As a scientist retired from a 30 year career in a government agency, I know that there are many difficult challenges in public service. However, you make a difference, and I thank you for working to protect these resources and sacred landscapes. I have been visiting south Montana for more than 23 years, and am now a seasonal resident and Montana taxpayer. I have enjoyed hiking, wildlife watching, horseback riding, and winter sports in many parts of the Custer Gallatin National Forest (CGNF). I have hiked or ridden a horse in the Lee Metcalf Wilderness, Cabin Creek and Earthquake Lake Geologic Center, Porcupine and other components of the Gallatin range, Beartooth Absaroka area, and Chico/Emigrant Peak areas. I have had incredibly memorable trail rides in sections of the CGNF abutting northwest sections of Yellowstone National Park on the Sky Rim Trail and the Bacon Rind/Skyline trail through the Monument Mountain area, where we saw almost no human presence, but abundant wildlife including signs of grizzly bears, and unspoiled vistas. I have also passed through portions of the CGNF unit near Ashland, MT. In repeatedly visiting these areas over more than 20 decades, I was seeking solace of wild places, opportunities to learn about nature and human history, clean water and air, unimpeded views, and a chance to observe fish and wildlife. Collecting these experiences has enriched my life immeasurably, more than accumulating material possessions. Although I do not have objective data on the economic impacts of recreational use of the CGNF, I know that I myself have spent hundreds or even thousands of dollars at local businesses for food, lodging, fuel, outdoor equipment and clothing, guides and other outfitter services each time that I have visited public lands that are part of the CGNF. I have also witnessed the tremendous development in Gallatin County, which brings both opportunity and greater potential impact to the landscape, habitat and wildlife from number of visitors and uses, to the region. There are few places left anywhere with intact natural systems, and it is not possible replace them or add them back to the landscape after they are compromised or lost. The richness and accessibility of these wilderness areas have attracted many visitors and new residents, like me, to the Gallatin valley. Growth in the area, which is in part a benefit of past efforts to consolidate and protect public lands while allowing development of private parcels, comes with a growing obligation to secure and enhance the wild landscape that remains, while offering sustainable public access. This is what the CGNF plan update can provide.

General Comments: I favor management for wildlife and sustaining/enhancing habitat and migration corridors for native species, particularly endangered/threatened species and those of cultural significance to indigenous American tribes, forest-wide. In general, I support adoption and strengthening of Alternative D with its approach to retain and expand conservation of Wilderness Areas, and recommended Wilderness Areas, particularly in areas where these areas abut or can function as a buffer between already protected units and private or developed lands, which is particularly important in conservation and reduction of human conflicts with threatened species, such as grizzly bears, and their habitat. I support elements of enhanced protection such as implementation of the Gallatin Forest Partnership agreement. I generally favor public uses over private or extractive uses of public land, and non-mechanized uses over mechanized uses (because of impacts to substrate, water and air quality, noise impacts, and safety considerations). However, I recognize that there is a long tradition of grazing leases for cattle and domestic sheep, as well as established use of certain trails and corridors for biking, snow machines, and off road vehicles, and believe that these established uses can continue with science-based thoughtful management and enforceable standards, with some changes to reduce conflict with critical wildlife management or human safety. In particular, efforts should be made to place emphasis on protection of bison and bighorn sheep uses of national forest lands where these populations exist or migrate. I have watched with great dismay and horror, the consequences of the Interagency Bison

Management Plan, which should have been abandoned and updated years ago with more emphasis on science and less on private special interests. Priority should be given for year-round access for the American bison in elements of the CGNF that are within their range and migratory patterns. This would not only benefit populations of bison, but reduce habitat impacts from grazing, provide "natural" prey for grizzlies and other predators that may be implicated in livestock loss, and eliminate divisive, wasteful, and expensive "management" strategies such as harassment, confinement, and slaughter of bison. I also urge increased coordination and a stronger role for native American tribes in management strategies, particularly in the Crazy Mountain and Ashland sections. Cultural tradition, sacred lands and species, and treaty rights of native Americans deserve higher priority in the CGNF, and all public lands. Successful management, regardless of the plan that is ultimately adopted, is also dependent on implementation of transparent standards or metrics, and objective monitoring to provide objective data for monitoring or adaptive responses to extreme weather, climate, fire, or other variables.

Detailed comments or recommendations:

- \* Manage recommended Wilderness just like designated Wilderness, allowing only foot and horse travel in recommended Wilderness and not allowing any mechanized or motorized use
- \* Designate the following roadless areas in the Pryor Mountains as recommended Wilderness in enhance strategies for their protection: Lost Water, Big Pryor, Punch Bowl, and Bear Canyon
- \* Maintain the boundaries of the current Recommended Wilderness Areas (RMAs) in the Lionhead, Absaroka Beartooth, Blacktail Peak, Buck Creek, Crazy Mountains, Cowboy Heaven, Gallatin, Cabin Creek North and South, Phelps Creek, Spanish Peak East and South, Taylor Hilgard, West Bridger, Yankee Jim Lake
- \* Additionally recommend Dome Mountain, Emigrant Peak, Chico Peak, Woodbine, East Rosebud to Stillwater, and Red Lodge Creek for Wilderness designation
- \* Manage the Tongue River Breaks, King Mountain, and Cook Mountain in the Ashland district as recommended Wilderness and increase consultation with native American tribes in that region.
- \* Expand the Grizzly Bear Recovery Zone to include all of the Absaroka Beartooth, Bangtail, Bridger, Crazy Mountains, Gallatin, and Henry's Lake.
- \* The best available scientific information supports including enforceable forest wide standards to protect key linkage areas, habitat connectivity, and food security for threatened grizzly bears.
- \* List bighorn sheep as a Species of Conservation Concern.
- \* Priority for American bison year-around access and migration should be given over grazing allotments.
- \* The Custer Gallatin must phase out grazing allotments in American bison, bighorn sheep, and threatened grizzly bear ranges. Grazing leases in certain wildlife ranges have created decades of divisive conflict and costly mismanagement, contributed to spread of disease from domestic animals to wildlife, and increased risk of loss of livestock to predation. These conflicts can be reduced by more thoughtful and science-based approaches to leasing practices. No new or expanded leases should be permitted for cattle in bison range and migration corridors, or for domestic sheep in the range of bighorn sheep populations. No new or expanded leases for any domestic livestock should be issued in the Grizzly Bear Recovery Zone. Existing grazing leases should be phased out, or exchanged for substitute allotments in areas that are not in conflict with management and protection of native wildlife. Fencing and other barriers should be removed from vacated allotments.
- \* The best available scientific information supports including enforceable forest wide standards to protect key linkage areas, habitat connectivity, and food security for threatened grizzly bears, as well as for enforcement of rules and conditions related to grazing leases and uses in Wilderness areas and RMAs.
- \* Implement forest-wide standards for all grazing permits requiring "let-down" fencing and remove barriers that impede migration of native species. Safer passages for wildlife across highways and roads should be a forest-wide practice, with emphasis on wildlife migration corridors. Management actions that restrict or impede natural migrations are in conflict with National Forest planning rule requirements to use the best available scientific information, and restore habitat connectivity.