

Date submitted (Mountain Standard Time): 9/8/2020 6:44:32 PM

First name: Triel

Last name: Culver

Organization:

Title:

Comments:

September 8, 2020

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Submitted online at: <https://cara.ecosystem-management.org/Public/CommentInput?project=50185>

Re: Objection to the Custer Gallatin National Forest 2020 Land Management Plan (Final Plan), Draft Record of Decision, and Final Environmental Impact Statement

Responsible Official: Mary Erickson, Supervisor, Custer Gallatin National Forest

I submit the following objection to the Custer Gallatin National Forest 2020 Land Management Plan. Pursuant to 36 C.F.R. Section 218.11(a), I request to meet with the reviewing officer to discuss and resolve these objections.

Standing: I previously commented on the Draft Plan on March 5, 2019. Unfortunately, Custer Gallatin Forest Plan Revision Team did not adequately address the concerns I raised in the previous stage of the forest plan revision process.

Objection. The 2020 Forest Plan is a major step backward in protecting the CGNF. Unfortunately, this is consistent with the present administration's actions to roll back protective regulations on a federal level. I had hoped that Custer Gallatin Forest Plan Revision Team and Reviewing Office would have analyzed the needs of the CGNF based on science and independent of any agenda or pressure, political or otherwise, but that does not appear to be the case.

The 2020 Forest Plan needs to be more ambitious than the previous forest plan in its ecosystem protections not only to maintain the status quo on the CGNF but to remedy the negative impacts that the previous forest plan either did not predict or was not robust enough to adequately protect against such harms as population growth and density, climate change, development and expansion of the wildland-urban interface, and the explosion in outdoor recreation both before and after Covid-19. Since I wrote my comment on the Draft Plan, there has been a second whitefish kill on the Yellowstone River (the 2020 Forest Plan never addressed my comment related to the first whitefish kill in 2016 caused by a parasitic condition accelerated by climate change), a major wildland fire in the Bridger Mountains, and a dramatic increase in camping and recreational use on the CGNF due to the public's (national and regional -- not just local) desire to escape Covid-19 by visiting the CGNF. In the face of these threats, the 2020 Forest Plan must be overly conservative in its protection of the resource and ecosystem but it falls far short.

As the draft Forest Plan recognized, the best way to strengthen species and ecosystem protection in the face of climate change and population growth is by expanding Wilderness designation. (Draft Plan at 96-97). Consequently, my previous comment encouraged the Revision Team to provide an alternative that included all of the roadless areas as Wilderness or, at a minimum, select Alternative D because it provided the most Wilderness. It did neither and I object to the 2020 Forest Plan because it fails to offer an alternative that included all of the inventoried roadless areas as Wilderness and because it rejects Alternative D which provides the most Wilderness additions. Of the 39 possible Wilderness recommendations, the 2020 Forest Plan chose only seven. I further object because the 2020 Forest Plan does not include all of the 58 streams (out of 761) I requested should be designated as Wild and Scenic Rivers many of which afford climate refugia for native fish. While the 2020 Forest Plan recognizes the importance of riparian areas and climate refugia, it included less than 8% of the eligible streams in total. Rather than provide a detailed explanation for these rejections, it relied

on conclusory statements with no analysis of the baseline data and science related to the fisheries or the rivers and streams.

In rejecting Alternative D and selecting an alternative with less Wilderness designation, the 2020 Forest Plan is legally deficient because it has reversed, without justification, previous protections afforded on CGNF lands provided in the Montana Wilderness Study Act of 1977 and by its predecessors in charge of the CGNF.

I also object to the 2020 Forest Plan because it fails to provide the kind of detailed analysis envisioned by NEPA and NEPA Draft Guidance documents. For example, the 2020 Forest Plan claims that the public did not provide sufficient detail on the characteristics of the eligible streams and rivers. However, it is the CGNF's duty to provide the inventory information related to eligibility - not the duty of the public as was claimed in the rebuttal to public comments on the subject.

Similarly, while the 2020 Forest Plan recognizes potential climate change impacts, it makes no effort to analyze or quantify the impact on the resources directly affected by the changes in the 2020 Forest Plan let alone any consideration of mandatory adaption measures for these impacts. This is particularly important when the 2020 Forest Plan is expanding recreation on the CGNF and climate change can magnify the damaging strength of certain effects of a proposed action to expand activity. CGNF has not adequately monitored recreational use of the CGNF and, without baseline data, is not in a position to expand and increase recreational use in the face of climate change. The main deficiency is that the 2020 Forest Plan makes no effort to compare the impact of climate change on the reasonably foreseeable future condition of affected resources under Alternative D or make a full comparison between the various alternatives including those alternatives that expanded recreational use without Wilderness protections. Had the 2020 Forest Plan made a comparative analysis, even in the absence of baseline data, reasonable scientific analysis would lead it to conclude that Alternative D, with the broadest Wilderness designations, is the only alternative that could adequately reduce or mitigate the effects of climate change and not adversely affect wildlife, fisheries, forests, river corridors, or other resources of the CGNF.

Conclusion. The 2020 Forest Plan's is replete with uncertainty about climate change and its impacts on natural communities. It contains no baseline data, just a brief mention of carbon sequestration, and no robust analysis of the interaction between its proposed action, the various other alternatives, climate change, and other sources of cumulative impacts including those from population growth and expansion of recreational activities. The best available science should have led it to select Alternative D. But it did not. At a minimum, the 2020 Forest Plan should have erred on the side of caution and selected Alternative D until it developed reasonable baseline data and modeling. Alternative D is still available as a remedy.

I look forward to discussing this objection further and working with you to address my concerns.

Sincerely,

Triel D. Culver