

Date submitted (Mountain Standard Time): 6/4/2019 10:00:04 PM

First name: Julie

Last name: Holzer

Organization:

Title:

Official Representative/Member Indicator:

Address1: 16 S. Platt B

Address2: PO Box 2152

City: Red Lodge

State: MT

Province/Region: Montana

Zip/Postal Code: 59068

Country: United States

Email: jholzer29@gmail.com

Phone: 8012011512

Comments:

I am commenting on proposed plan revisions to the Absaroka Beartooth Mountain Wilderness area. These comments will touch on the negative impact motorized vehicles can have on our ecosystem, watershed and soil, wildlife, historical cultural sites, non-native species, and recreationists. I will refer specifically to alternatives D and E as outlined in the Forest Plan. Alternative D is the best option.

The overall term for these vehicles is off highway vehicles or OHVs. This includes ATVs, snowmobiles, motorcycles, and high clearance four-wheel drive vehicles. A 2006 survey of Montana's OHV registered owners was conducted by the Montana Fish and Wildlife Department. OHV users considered 16% to 23% of other users as "Bad Apples". (This survey may be viewed by contacting the Response Management Unit at the MFW). Given the increased popularity of OHVs and population growth, if even 10% of current OHV users are possible bad apples, this can result in damage to the environment. The Pryor Coalition (www.pryormountains.org) has compelling photographs of OHV damage done by reckless drivers who seek a challenge. Much of the damage is done by OHV drivers making their own trails, spinning circles on vegetation, driving through and crushing a beautiful field of blooming wildflowers. This irresponsible and reckless behavior can do irreparable harm to the ecosystem.

As an example, these "new" trails made by drivers of OHV's cause unstable hill slopes which causes the soil to erode or become dislodged, possibly into surface water. Soil erosion can cause sedimentation which can compromise our fisheries. It can kill food sources, newly laid eggs, and young fish. Our trout populations are already in decline and further stress will only exacerbate this decline. New trails can also erode banks along the surface water causing stream flow alteration. It is possible some reckless driver might even drive through the water and damage riparian ecosystems.

The first alternative on pages 23-24 concerns stream and headwaters restoration. Alternative D proposes 800 miles of restoration and alternative E proposes 200 miles. The next alternative concerns the amount of stream crossings to assist aquatic organism passage. Alternative D proposes 7-10 crossings while E proposes 1-3. The third alternative concerns the amount of created passages with design features to restore habitat for at-risk aquatic species. Alternative D proposes 8-10 projects and E proposes 1-3. Headwater and surface water must be protected as well as aquatic species. Alternative D best protects these valuable resources.

A particular concern is our wildlife habitat. Our wildlife needs their habitat to shelter, feed, breed, raise their young, and migrate. Constant noise and pressure from so many OHVs will disrupt their habitat and diminish wildlife populations. In winter, many species struggle to survive the snow and cold. The presence of snowmobiles further stresses our winter wildlife putting them at risk. The noise and smoke pollute their habitat.

Wildlife objectives are on page 57. The first objective is to complete programs of conservation for at-risk wildlife and to design features to restore habitat. These programs are intended to be completed every decade. Alternative D proposes 8-10 programs every decade while E proposes 1-2. The second objective is on page 57. It will require designs to maintain or improve wildlife habitats, completing these programs every decade. Alternative D proposes 12 projects a decade and E proposes 5.

The Absaroka Beartooth area is famous for our wildlife; moose, bear, elk, and mountain lion to name a few. The Absaroka Beartooth mountains have become an international destination due in part to these amazing

animals. These visitors have a significant economic impact on our area. For these reasons and many more, it is crucial that we protect our wildlife and their habitat. This requires effective management on the part of the Forest Service. Alternative D is the preferred alternative to protect our wildlife.

The Absaroka Beartooth area is rich with cultural history, especially in the Pryors. The Pryor mountain range is sacred holy ground to the Crow people. It is where their ancestors fasted and prayed. Tipi rings, vision quest sculptures, and medicine rings are sacred areas in the Pryors. The land has deep spiritual meaning to the Crow. Today, the Crow Nation continues to conduct religious ceremonies in the Pryors. The Pryors are also popular with OHV enthusiasts. The proximity to Billings makes it convenient. We should all be concerned about possible disrespect of the Crow people and their tribal rights by irresponsible OHV drivers. The Forest Plan must be clear that the sacred sites of the Crow Nation are to be respected.

The introduction of invasive species and noxious weeds is a serious concern. The possibility doubles considering the distance OHV drivers can travel increasing the spread of nonnative species. The alternatives on pages 53-54 concern noxious weed management and actions. Alternative D proposes 4,500-7,000 acres of management area and E proposes only 500-2,500 acres. Effective management of noxious weeds reduces the range of these weeds and ensures that they do not conflict with native species upsetting the ecosystem. Once again D is the preferred alternative.

People come to the Absaroka Beartooth mountains for many reasons. The quiet, solitude, and unspoiled beauty of the mountains makes trekking miles into the backcountry worth it. Now imagine intrusion by OHVs. The noise, exhaust, and the very presence of OHVs ruins this experience, especially if the drivers are being disrespectful and reckless.

Both Table 49 (Forest plan land allocations in the Absaroka Beartooth Mountains Geographic Area on page 159) and Table 30 (recreation emphasis area acres on page 133) are disconcerting. In both cases alternative E appears to propose opening the West Fork of Rock Creek for off-road motorized vehicle use. It is the only alternative that proposes to do so.

Alternative E continues to promote opening more opportunities for off-road motorized vehicle recreation despite concerns for the ecosystem, wildlife, and the recreation of those who seek to enjoy the mountains as nature intended. Desired conditions and motorized recreation are not always compatible. Some desired conditions and standards can be negatively impacted by irresponsible OHV users. There are inherent risks when OHVs are present. A fuel spill might happen in a sensitive area, engine sparks may cause wildfires, reckless drivers might impact the safety of hikers or responsible OHV drivers. In the future, overcrowding of OHV riders will adversely affect the ecosystem through overuse. The land can only tolerate so much. This quote is taken from the Pryor Coalition website:

"Everyone has the right to enjoy these public lands, but no one has the right to abuse the landscape or damage the experience of others."

Alternative D is the best way to protect our heritage for generations to come.