

Custer Gallatin Forest Plan (Comments)
Mary Erickson, Forest Supervisor
Custer Gallatin National Forest
10 East Babcock
Bozeman, MT 59715

Custer Gallatin Draft Revised Forest Plan comments

By Phil Knight

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Submitted on behalf of Montanans for Gallatin Wilderness

May 26, 2019

Dear Ms. Erickson,

Thank you for this opportunity to comment on the Draft Forest Plan for the Custer Gallatin National Forest.

Montanans for Gallatin Wilderness is a grassroots advocacy group committed to assuring and achieving Wilderness protection for the roadless portion of the Gallatin Range. We have no official membership nor officers nor dues. Yet we have been here for 15 years fighting for the wild country of the magnificent Gallatin Range. Many of us have worked for this goal even longer. You can find our wilderness proposal at www.gallatinwilderness.org.

Personally, I've been stomping around on the Custer Gallatin since 1983, and helped write an appeal of the original Gallatin Forest Plan in 1986. I've been to many remote and many not so remote corners of the Forest, from the Grotto Falls trailhead to the summit of Granite Peak. I've sought to protect this forest for decades, generally not for any personal gain but because I know it is the right thing to do. I've worked alongside all manner of people, swinging picks, picking up trash, documenting trail conditions, tracking wildlife, examining timber sale plans, creating maps, organizing and hosting public meetings, and participating in other public meetings. I've written articles about special places here, photographed the landscape, paddled the rivers, biked and hiked the trails, skied the peaks and canyons, observed and enjoyed (and been charged by) the wildlife, and sat under a tree soaking up the peace and quiet. I co-wrote the report "Motorizing Yellowstone – An Investigative Report on Off Road Vehicles Use within the Gallatin National Forest" in 2001.

We want to thank you and all the Custer Gallatin staff for your hard work on the new Forest Plan. Thank you for meeting with us, and thank you especially for including Alternative D.

Context

Few national forests offer the opportunity to preserve so much of the ancient world, the original and unrefined North America that existed and evolved for millions of years before “modern” humans arrived with all their tools and machines, bent on shaping the landscape into something more human.

Native Americans lived on this land for at least 12,000 years and left it relatively intact. They treated the land with respect and admiration, and did not squander the resources. In a bit over 200 years Europeans have managed to intensely alter much of the landscape of North America, and are still at it. The Custer Gallatin Forest is no exception.

Roads have already been punched into many corners of the Custer Gallatin, to the point of excessive road networks. Roads are the worst kind of disturbance for wildlife, fragmenting habitat for elk, moose, grizzly bears and other sensitive species into smaller and smaller blocks, leading to island populations hanging on in remote, disconnected locales.

Here’s an image from Google Earth, of the Little Bear drainage in the Gallatin Range, 2009. Talk about habitat fragmentation.



We urge you to adopt Alternative D, with some modifications, for the final Custer Gallatin National Forest Plan. This alternative offers the best chance of preserving the unique and essential characteristics of this spectacular piece of the Last Best Place by protecting the majority of roadless lands on the forest as Recommended Wilderness.

According to the Summary for the Draft EIS, on page 6, “Alternative D was developed to address comments and themes of emphasizing natural processes and restoration.” We wholeheartedly support this intent and believe this should be the overall mission of the Custer Gallatin, much of which constitutes the northern part of the Greater Yellowstone Ecosystem (GYE), widely recognized as one of the most intact ecosystems in Earth’s temperate zones (for how much longer?).

The Custer Gallatin National Forest belongs to all Americans and should be treated with caution, forethought and respect. It is not ours to tinker with and shape as we see fit to meet our short term goals and desires, to manipulate for profit and career, nor to mold it into yet another human artifact.

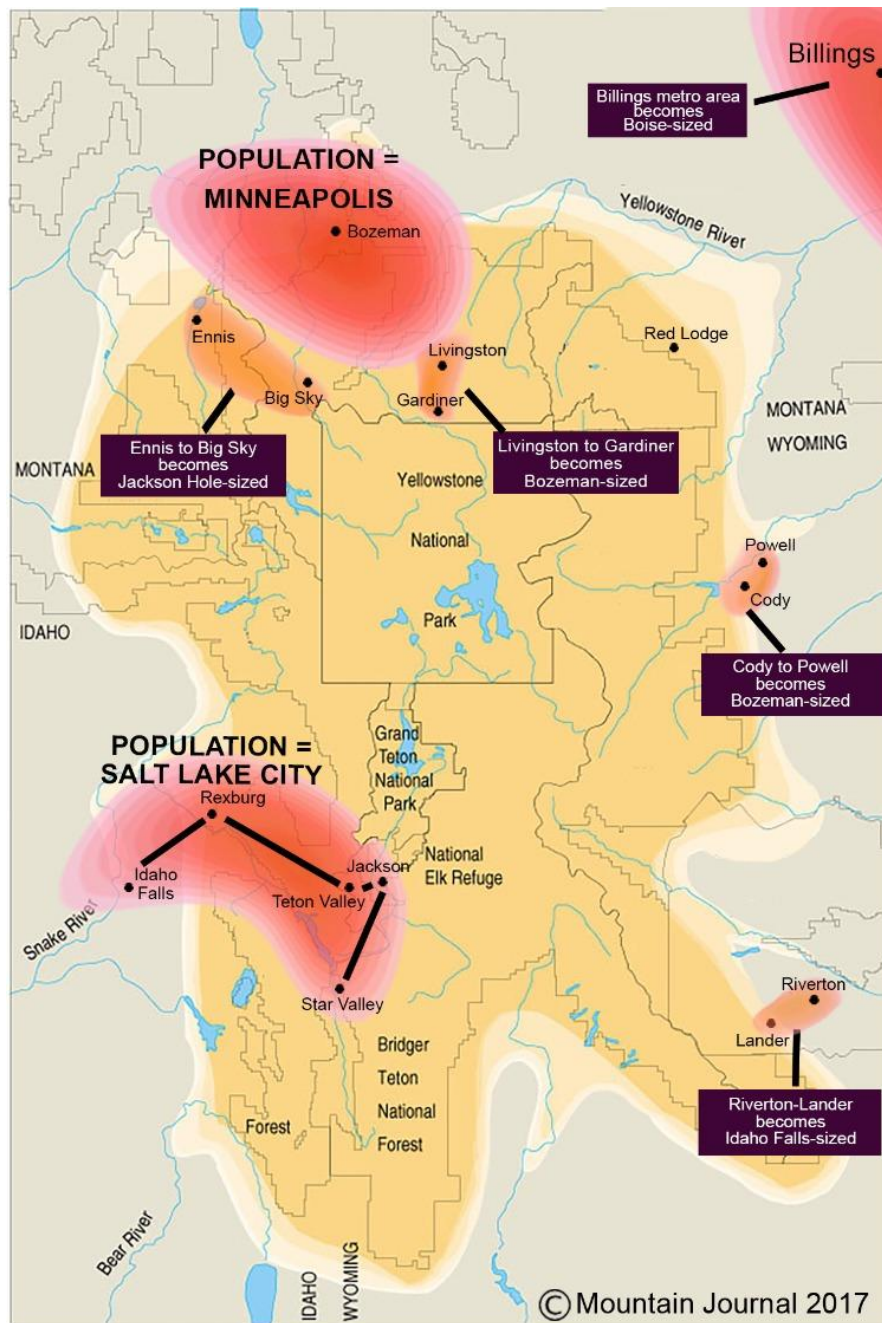
Population Explosion

Gallatin County and the Bozeman/Belgrade metro area is one of the fastest growing areas in the US in terms of human population and urban sprawl. The Custer Gallatin must adopt the highest possible level of protection for the forest as a bulwark against the oncoming horde of humans. Recreation pressure in places like the Colorado Front Range and the Moab/Canyonlands area of Utah is completely overwhelming the public land there and turning it into nothing but an urban playground. To think that cannot happen here would be naïve. Go up Hyalite Canyon on a summer weekend – it is an urban park. We must in fact EXPECT tripling or quadrupling of regional population within the life of the Forest Plan and resultant recreation pressure and impacts. Population in the Bozeman/Big Sky area is approaching 5 per cent (around 2,000 people just in Bozeman) per year and is accelerating. Development in Big Sky and Yellowstone Club is gobbling up wildlife habitat for trophy homes for millionaire and billionaires, homes which are unoccupied much of the year.

Golden Egg

Our public lands like the Custer Gallatin National Forest are truly the goose that laid the golden egg. Montana is about 24% public lands, and its economy is heavily dependent on those lands. Montana’s economy, according to Headwaters Economics(6), is outperforming much of the nation. The fastest growing part of the Montana economy in the past two decades is the service sector (health care for instance, and legal services), with Real Estate a close second. Forestry and related activities such as fisheries grew by only a small fraction in comparison.

The economy is booming because Montana offers quality of life. One of the biggest draws for quality of life is access to public lands – particularly pristine lands such as some of those offered by the Custer Gallatin. Two of the five fastest growing counties in Montana (Yellowstone and Gallatin counties) border the Custer Gallatin. From towns like Bozeman and Billings you can actually look up at the mountains and see pristine, wild, undeveloped landscapes. This is a huge draw for people moving here.



Predicted population growth in Greater Yellowstone Ecosystem by 2065

Thus the need to set aside as much Wilderness as we can, through whatever means are available. Wilderness acts as a buffer from the press of people and their machines that push ever farther into the hinterlands. Congress is unlikely to act on Wilderness bills in general, being mired in controversy over the corrupt and ruinous administration of Trump. The Forest Service can do its part by using interim protection via the administratively created Recommended Wilderness designation.

Wilderness is often portrayed as a “single-use” land designation that locks people out. But Wilderness is not about keeping people out, or just creating a backpacker’s park. It is about allowing the Earth’s natural processes to continue in as natural a fashion as possible. Wilderness areas are not museum pieces either, they are thriving, living, changing, evolving ecosystems.

Wilderness is also an essential refuge for people in need of rejuvenation and relief from the endless barrage of news and ads and screens and traffic and noise that confront us daily.

The anti-environment, anti-public lands, anti-wildlife biases of so -called President Trump cannot be ignored in making your decisions. He is in the process of very deliberately dismantling much of the legacy of environmental preservation and law that we have built since the days of John Muir and Gifford Pinchot. The Republican Party is right there with him, cheering on and facilitating his exploitive approach to public lands and wildlife. Trump’s energy dominance agenda for public lands is an unfolding disaster that will leave a legacy of destruction and pollution for decades to come. Not to mention a ruined climate! He also seeks to push forward increased logging on public lands regardless of the impacts.

It is up to you, Mary Erickson, to help push back against Trump’s anti-public-land, anti-environment agenda and to help save some of our public land and wildlife legacy from Trump and his greedy supporters.

The Unravelling of Nature

At the same time, the United Nations, in a 1500 page report released in May 2019 concludes that “A million species face extinction” due to human activity. (1)

The report concludes that “Nature and its vital contributions to people, which together embody biodiversity and ecosystem functions and services, are deteriorating worldwide.” This is a terrifying prospect. It is not a new concept – that nature and biodiversity are in decline has been well understood since the 1970s – but the scale and pace of the loss, and the alarms being sounded at the highest levels of international policy, is new. As is the view that nature provides services to humans that cannot be replaced and, if lost, will mean a grim and uncertain future for humanity.

We are nearing the crux, when we can decide to save the natural world or not. Or, it may be too late. Whichever is true, it is the responsibility of policymaker such as yourself, Ms. Erickson, to act and to make wise decisions that will contribute as much as possible to the preservation of the natural world for, if nothing else, the continued existence of human civilization.

Climate change

Wild, undeveloped landscapes like those that still exist on the Custer Gallatin also serve as climate change refugia for species that are ever more stressed by a climate gone berserk. Animals and plants need to room to move as their homes become uninhabitable or crowded by invader species. Too many humans on the landscape crowd the critters into corners. Keeping wild what is presently undeveloped is the MINIMUM we can do to for wildlife that are bombarded by changes that are not of their making.

Climate change is not a theory, not a “hoax,” not a subject to study because the “jury is out” – it is real and it is happening and it has very real and possibly dire consequences.

According to the 2017 Montana Climate Assessment (4) average temperatures in Montana rose between 2 and 3 degrees Fahrenheit between 1950 and 2015. By mid-century Montana temperatures are projected to rise another 4.5 to 6 degrees F! This spells big trouble for any species intolerant of warm weather or dependent on deep, late-season snowpack. The Climate Assessment predicts a decrease in snowpack and earlier runoff, leading to low flows in many rivers and streams in summer. Snow and cold dependent species include moose, wolverine, lynx and pika. All of which are found on the Custer Gallatin and none of which enjoy any sort of federal protection (other than lynx).

In addition, forest fires are projected to be more frequent and larger, and fire season will be longer. The very makeup of the forest is likely to change, with fire-tolerant tree species taking over while wet-and-cool dependent species die out.

Some species are likely doomed. Whitebark Pine is of course a classic example, hit by the 1-2-3 punch of bark beetles, blister rust, and extreme fires. We have also observed more Whitebarks killed by intense, climate-change driven weather events like avalanches and blowdowns.

Loss of Whitebarks means more grizzly bears at lower elevations in the fall during hunting season. This means more hunter/bear conflict and more dead bears. Not to mention the loss of an important food source for bears (pine nuts). It could also mean more bear predation on young elk and lower reproductive success for elk and fewer elk for hunters.

We can expect cascading chains of events like this, driven by climate change and the loss of certain species. Some of these events will take us by surprise as unforeseen impacts play out. We must use the precautionary principle and take the cautious road in planning for the future.

Intrinsic values

The benefits of free access to natural landscapes for all people cannot be overstated. These benefits may be hard to quantify or measure but they are immense. As our cities and towns become ever more noisy and crowded, with development on every front and vehicles crowding our roads and neighborhoods, access to a quiet place where change is slow is essential for mental health.

Among the many benefits the Custer-Gallatin offers to local people and to visitors from around the country and the world are:

- Stunning visual panoramas of wild mountains, forests and rivers.
- The chance to experience free-roaming native wildlife in its natural habitat.
- An immersive experience in a natural, unaltered landscape.
- Peace and quiet and solitude removed from the ever-increasing roar and intensity of the human world.
- Natural soundscapes where the dominant sounds are from water, weather, birds, and animals.

- Time and place for reflection, renewal and spiritual connection with our true home, the natural Earth.
- Open land and trails to exert one's self, test one's abilities, and blow off steam.
- Vast landscapes to explore and wander at one's own pace.
- Wild, undeveloped, untamed places where nature still holds sway and challenges and humbles visitors with weather, terrain, wildlife, and distance.
- Places to watch the seasons unfold and return to over and over again in changing weather and different times of year.
- Pleasant surroundings to enjoy times with family and friends, a chance for experiences to share and remember.

Essential Services

The Custer Gallatin National Forest provides essential services that we cannot live without. We are not talking here about "products" such as saw timber or minerals, though these have their place. I mean the collection, filtration and delivery of fresh water, the filtration of air and production of oxygen via forest transpiration, the maintenance of large scale natural processes such as forest fire, flood, and evolution, wild animal habitat, oxygen from transpiration, rainfall from same, and habitat for animals which cannot exist elsewhere. All of these services are provided by nature for free! IF we allow them to proceed and do not try to tinker too much and impose our human systems and values on the land.

Where are the Rangers?

One perennial problem we have seen on the Custer Gallatin, and on national forests in general, is a lack of rangers or any kind of personnel on the ground. Only in Hyalite Canyon do we ever encounter rangers on patrol – law enforcement folks in their vehicles. Admittedly this is the place they are most needed, so thanks for them being there. But in general there is very little presence of staff out in the forest, keeping an eye on things. Most of the Forest Service staff are in their offices, in their cubicles, doing who knows what (probably analyzing Forest Plan comments)! We'd like to see a breakdown of staff time spent out on the ground as opposed to in the office, and the effectiveness thereof.

Specific areas and Recommended Wilderness

Gallatin Range

This magnificent mountain range, rising along Bozeman's southern front and stretching far into Yellowstone's Northwest corner, deserves special protection. At least half of the range has already been compromised by logging and road building. But the Forest Service has the chance to preserve what is left.

The Gallatin Range holds over 500,000 acres of contiguous roadless Wilderness when viewed as a whole (including the Yellowstone National Park portion). It is the only range extending into Yellowstone that

enjoys no designated Wilderness protection. It does have the Hyalite Porcupine Buffalo Horn Wilderness Study Area, at 155,000 acres

It is disturbing that only 1 out of 5 alternatives presented in the DEIS would preserve wilderness management of the entire WSA. This at a minimum should be in EVERY alternative. The Forest Service already got sued because of failure to protect the wilderness quality of the land.

The Gallatin Range has 18 species of life identified as at risk by the Montana Heritage Program. The range is part of a critical pathway for genetic connectivity between the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem, and on to the Yukon.

The 155,000 acre Hyalite Porcupine Buffalo Horn Wilderness Study Area (WSA) has long been recognized as the biological heart of the range. Historical land trades made it possible for the Gallatins to be consolidated into public ownership. More on that later.

The Porcupine and Buffalo Horn valleys contain critical grizzly bear habitat, elk winter range, and a vital elk migration corridor, and are an excellent place for recolonization by wild bison.

Alternative C would protect only about half of the wilderness quality lands, in a "rocks and ice" proposal that leaves the Porcupine and Buffalo Horn (PBH) drainages open to motorized and mechanized recreation, more timber harvest, and even possible temporary road-building. Worse, Alternatives B and C propose legitimizing decades of illegal mountain biking and ORV use in the HPBH WSA. The 1977 law that created the WSA required the Forest Service to manage the area as Wilderness and to limit ongoing uses to the level and area where they **existed at the time of passage of the Act**.

Unfortunately all of the alternatives allow the continued presence of the Big Sky Snowmobile Trail. The Big Sky snowmobile trail is basically a road through remote, roadless country that should be wild and undeveloped. This "trail" is wider than most actual trails, the trees are mowed down and the stumps cut to ground level, and road signs are used. It hosts unregulated numbers of high-powered motor vehicles. This is a trail in name only. The part of the trail through Porcupine Creek and up First Creek into Portal Creek, as well as the section through Buffalo Horn area (along Hurricane Ridge) needs to be closed, or re-routed closer to Highway 191.

The final plan must declare the entire contiguous 230,000 acres of the Gallatin Range as Recommended Wilderness. Alternative D falls short of that acreage by about 33,000 acres. The concept of a 230,000 acre Recommended Wilderness in the Gallatin Range enjoys widespread support. This ad recently appeared in the Bozeman Daily Chronicle:

SUPPORTERS FOR A 230,000 ACRE GALLATIN RANGE WILDERNESS

As biologists, wildlife advocates, and members of the scientific community, we hereby express our strong support for maintaining the ecological integrity of the Gallatin Range by establishing a 230,000-acre or larger Wilderness under the 1964 Wilderness Act. We consider Wilderness designation to be the "Gold Standard" for preserving wildlands and ecological values.

The scientific community recognizes that large protected areas connected to other large protected regions is the best way to preserve high-quality wildlife habitat and assure the continuance of essential ecological processes like wildfire, predation and migration.

We strongly encourage all citizens to contact the Custer Gallatin National Forest before June 5th and tell them that you support Alternative D and recommend a Gallatin Wilderness of 230,000 acres.

Forest Service Comments can be made at:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=50185>

Bruce Babbitt, JD Former Secretary of the Interior, 1993-2001 Washington, DC	Natalie Dawson PhD Former Director, Wilderness Institute WA Franks College of Forestry & Conservation University of Montana, Missoula, MT	Randy Hayes Executive Director, Foundation Earth Founder, Rainforest Action Network Washington, DC	Erik Molvar MS Wildlife Biologist Laramie, WY	Rick Reese Principal Founder & Three-Term President, Greater Yellowstone Coalition Former Director, The Yellowstone Institute Bozeman, MT
Dr. James A Bailey Retired Wildlife Biologist Colorado State University, Fort Collins, CO	Ann DeBolt MS Sagebrush Restoration Specialist Boise, ID	Ned Hettlinger PhD Professor Emeritus, Philosophy College of Charleston, Charleston, SC	Blaine Mooers PhD Associate Professor, Biochemistry & Molecular Biology University of Oklahoma, Norman, OK	Barry Reiswig, Refuge Manager, retired National Elk Refuge Jackson, WY
Joel Berger PhD Wildlife Conservation Society Cox Chair of Conservation Biology Colorado State University, Fort Collins, CO	Dominick DellaSala PhD President & Chief Scientist Geos Institute Ashtland, OR	Glenn Hockett Rangeland Ecologist President, Gallatin Wildlife Association Bozeman, MT	Susan Morgan PhD The Rewilding Institute Albuquerque, NM	Rick Ridgeway Patagonia Ventura, CA
Robert L Beschta PhD Professor Emeritus, Forest Ecosystems and Society Oregon State University, Corvallis, OR	Diane Debinski PhD, Department Head of Ecology Montana State University, Bozeman, MT	Steve Hoffman PhD Founder, Hawkwatch International Bozeman, MT	George Nickas Executive Director, Wilderness Watch Missoula, MT	William Ripple PhD Distinguished Professor of Ecology, Dept of Forest Ecosystems and Society Oregon State University, Corvallis, OR
Norman A. Bishop National Park Ranger, 1961-1997 Bozeman, Montana	David Delehanty PhD Professor, Ornithology, Animal Behavior, Conservation Biology Idaho State University, Pocatello, ID	Dr. Brian L Horejsi Speak Up for Wildlife Foundation Penticton, BC, Canada	Barry R Noon PhD Professor Emeritus, Department of Fish, Wildlife and Conservation Biology Colorado State University, Fort Collins, CO	Teddy Roe Legislative Assistant to Sen. Lee Metcalf Billings, MT
Denise Boggs Executive Director, Conservation Congress Billings, MT	Debra Donahue JD Professor Emeritus, College of Law University of Wyoming, Laramie, WY	Donald W Johnson, PhD Fisheries Scientist, retired Libby Creek Watershed Association American Falls, ID	Reed Noss PhD Conservation Biologist, visiting scholar, Duke University President, Florida Institute for Conservation Science Oviedo, FL	Jim Rokosch Water Resource Specialist Former Ravalli County Commissioner Stevensville, MT
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Dale Burk Stonewall Press Stevensville, MT	Dick Ellis MT Fish, Wildlife Parks, retired Billings, MT	Derek Lee PhD Principal Scientist, Wild Nature Institute Assoc., Research Professor Pennsylvania State University, State College, PA	Marilyn Olsen Wilderness Guide/Outfitter Big Wild Adventures Emigrant, MT	Gene Senty Rocky Mountain Front, MWA Choteau, MT
Stoney Burk JD Choteau, MT	Arnold D "Smoke" Elser Retired Wilderness Outfitter, Bob Marshall Wilderness Area Missoula, MT	Harvey Locke Co-Founder Yellowstone to Yukon Conservation Initiative Banff, AL, Canada	David Parsons MS Carnivore Conservation Biologist The Rewilding Institute Washington, DC	Shelley Silbert Executive Director, Great Old Broads for Wilderness Durango, CO
Franz Camenzind PhD Executive Director, retired Jackson Hole Conservation Alliance Jackson, WY	Al Espinosa MS USFS Fisheries Scientist, retired Moscow, ID	Thomas E Lovejoy PhD Professor Environmental Science & Policy George Mason University, Fairfax, VA	Debra Patta MS Northern Rockies Conservation Cooperative Moran, WY	Bruce Smith PhD Wildlife Biologist Bozeman, MT
John G Carter PhD Ecologist Yellowstone to Uintas Connection Paris, ID	Mary Fay Wilderness Supporter Helena, MT	Al Luebeck Stream Access Law Beaverhead & Pioneer Mountains Butte, MT	Doug Peacock Author & Grizzly Bear Advocate Livingston, MT	Linda Stoll MWA, former MT Legislator Helena, MT
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Yvon Chouinard Patagonia Ventura, CA	Barrie Gilbert PhD Senior Scientist, retired, Department of Wildland Resources Utah State University Logan, Utah	David Mattson PhD Leader, CO Plateau Research Station & Research Wildlife Biologist USGS Lecturer & Senior Visiting Scientist, Yale University, retired Livingston, MT	Jim Posewitz MT FWP retired, Cinnabar Foundation Helena, MT	Dick Walton, PhD The Pryors Coalition Billings, MT
Susan Clark PhD Northern Rockies Conservation Cooperative Jackson, WY Adjunct Professor, School of Forestry & Environmental Studies Yale University, New Haven, CT	Dennis Glick MS Conservationist Livingston, MT	Robert Maughan Professor Emeritus Department of Political Science Idaho State University, Pocatello, ID	Thomas Michael Power PhD Professor of Economics, Emeritus University of Montana, Missoula, MT	Gary Weiner MS Retired NPS, Landscape Architect Bozeman, MT
Lance Craighead PhD Executive Director, Craighead Institute Bozeman, MT	Joe Gutkoski Retired Forest Service Landscape Architect Smoke Jumper Bozeman, MT	Bruce Maxwell PhD Land Resources and Environmental Scientists Montana State University, Bozeman, MT	Thomas Pringle PhD Sperling Foundation Tucson, AZ	Cathy Whitlock PhD Department of Earth Science Montana State University, Bozeman, MT
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Paid for by a coalition of grassroots wilderness advocates including Great Old Broads for Wilderness and Montanans for Gallatin Wilderness. To sign in additional support, email nancyostlie@gmail.com

Madison Range

Cowboy's Heaven, a 17,000 acre roadless portion of the Madison Range connecting the Beartrap Canyon Wilderness and Spanish Peaks units of the Lee Metcalf Wilderness, should be Recommended Wilderness. This is part of a critical linkage from the Gallatin Range to the Gallatin River to the Spanish Peaks and Madison River.

Pryor Mountains

Wilderness in the Pryors could be expanded with the closure of a few tracks and dirt roads. For more information see www.pryormountains.org.

We request the following for Recommended Wilderness in the Pryors:
13,000 acres in the Lost Water Crooked Creek area.

Punch Bowl / Dryhead Creek Canyons RWA (~8,500 acres)

Big Pryor Recommended Wilderness Area (12,000 acres)

Bear Canyon RWA (10,000 acres)

Crazy Mountains

We are dismayed that the Custer-Gallatin Proposed Action recommended no wilderness in the Crazy Mountains despite identifying 90,690 acres as roadless. We ask that at least 90,690 acres be recommended for wilderness with the caveat that private inholdings should be removed through land trades or purchase.

Absaroka Beartooth Wilderness Additions

The following should be Recommended Wilderness.

Line Creek Plateau, 30,000 acres, including the 16,127 Line Creek Research Natural Area.

The West Fork and Lake Fork of Rock Creek and the Beartooth Front, 34,640 acres. The Proposed Action recommended only 801 acres.

The East Rosebud to Stillwater Roadless area along the Beartooth Front, 25,000 acres.

Deer Creek drainage, 129,000 acres, including lands surrounding the East Boulder, Lower Deer Creek, Upper Deer Creek and Bridger Creek.

Mount Rae, 5,000 acres between the Boulder and West Boulder Rivers.

Tie Creek/Mission Creek/Livingston Peak/ Shell Mountain, 8,000 acres

In Paradise Valley, Deep Creek to Strawberry Creek, 13,000 acres.

Chico Peak, Emigrant Peak and Dome Mountain, 56,000 acres.

Bridger Range

Recommended Wilderness in the Bridger Range should be 45,000 acres in two pieces. The Bridger Range is a critical corridor for wildlife migrating between Greater Yellowstone and the Glacier/Bob Marshall ecosystem.

Blacktail Peak in the northern Bridger Range has about a third of this roadless component and should be recommended for wilderness.

Lionhead

The Lionhead Roadless area, 32,000 acres, should be Recommended Wilderness. We are pleased that the CGNF has recommended nearly 18,000 acres as wilderness, though the 1986 Forest Plan had recommended 22,000 acres for wilderness. The recommended wilderness should be enlarged to include most of the 32,000 acre roadless area.

Aircraft landing strips

The DEIS on page 673 list 34% of the Custer Gallatin Forest as “suitable” for new aircraft landing strips. Really?? Anything outside of a sensitive or designated area is a fine place to build a long runway for noisy high powered flying toys? I see no actual demonstrated need for airstrips. What next, jetports for private jets? Rocket landing zones? Obviously aircraft can already fly over much of the forest; why would they need to land?

Road Decommissioning

The Custer Gallatin Forest Plan should lay out a concept to close and decommission as many unneeded forest roads as possible. But it looks like the only further decommissioning work planned is on the Ashland District (DEIS page 673). From 2011 to 2013 I worked for Wild Earth Guardians monitoring wildlife use of reclaimed roads in Moose, Tamphrey and Swan creeks in the Gallatin Range. Roads had just been decommissioned and in some cases recontoured. We set motion-activated cameras along these now unused roads and found a wide variety of wildlife using them, from grizzly bears to moose, bobcats, coyotes, deer and lots of elk. Many humans used the roads too but now only on foot.

Far too many old logging roads have chewed away at the edges of the wild country. We know it can be done and wilderness restored by removing these roads. Let's continue the process set in motion by former Forest Hydrologist Mark Story.

Some candidates for road removal would be Wheeler Mountain (where Big Sky Lumber roaded and logged some very steep country visible from Bozeman), Little Bear drainage (overly roaded if any place is), and more of upper Swan Creek, where Plum Creek Timber hacked away at many remote sections before selling the land to the public via the Gallatin Land Exchanges.

Land Exchanges and Tradeoffs

Speaking of land exchanges, some serious and long-lasting tradeoffs were made in the 1990s to consolidate dozens of sections of land in the Gallatin Range and eliminate the “checkerboard” land ownership pattern of alternating public/private sections.

Gallatin land exchange bills in 1993 (“Gallatin I”) and 1998 (“Gallatin II”) consolidated the majority of the privately owned (railroad) lands (approximately 38,000 acres) and transferred them to Forest Service ownership. In both bills, Congress recognized “lands north of Yellowstone possess outstanding natural characteristics and wildlife habitat which give them high value as lands added to the National Forest System.”

The tradeoffs included:

- Pioneer Mountain and the South Fork of the West Fork privatized and turned into a monstrous members-only ski area and massive real estate mess.
- Big Sky ski resort expanded and mansions and roads keep spreading far and wide through the mountains.
- Severing of the wildlife habitat in the northern (Spanish Peaks) Madison Range from the southern (Taylor-Hilgard/Monument Mountain) portion and end of the elk migration route over Jack Creek.
- Logging and road building in formerly roadless forest on the west side of the Northern Bridger Range
- Privatization of the west side of the Bangtail Range.

All this was done to consolidate the priceless Gallatin Range and make it possible to protect all of the remaining roadless land in the range as Wilderness. So let’s do so and **make sure all the sacrifice that went into this land exchange process was worth it.**

Here’s one of Plum Creek’s clearcuts, from the 1990s, in Swan Creek. This land is now public, and hopefully is starting to grow back from this scalping.



Photo by Phil Knight

Wildlife

I count at least 27 species that occur on the Custer Gallatin for the 2011 Sensitive wildlife species list for Region 1 of the Forest Service. Now there are only 3 – just 3!! listed as Species of Conservation Concern - white tailed prairie dog, pearly mussel and sage grouse, none of which are found in the more biologically diverse western (Gallatin) part of the forest.

Here's the 2011 list:

Peregrine falcon

Baird's sparrow

Bald Eagle

Black-backed woodpecker

Blue-gray gnatcatcher

Burrowing owl

Harlequin duck

Loggerhead shrike

Long-billed curlew

Trumpeter swan

Blacktailed prairie dog

White-tailed prairie dog

Bighorn sheep

Fringed myotis

Long eared myotis

Gray wolf

Wolverine

Pallid bat

Spotted bat

Townsend's big-eared bat

Great Plains toad

Northern leopard frog

Greater short-horned lizard

Milk snake

Western hog nose snake

Argos skipper

So all of these species, except the White-tailed prairie dog, have now recovered? I rather doubt it. I realize the list is dictated by Regional Forester, but the Custer Gallatin has a responsibility to demonstrate that it is very poor policy to abandon efforts to protect sensitive species at the federal level. Stepping away from Forest Service efforts to protect species found on national forests is an abdication of duty and failure to give the public the information and background they need to help maintain native wildlife. Loss of sensitive status by these wildlife species may be offset by choosing Alternative D as the best way to protect their survival habitat.

Bison

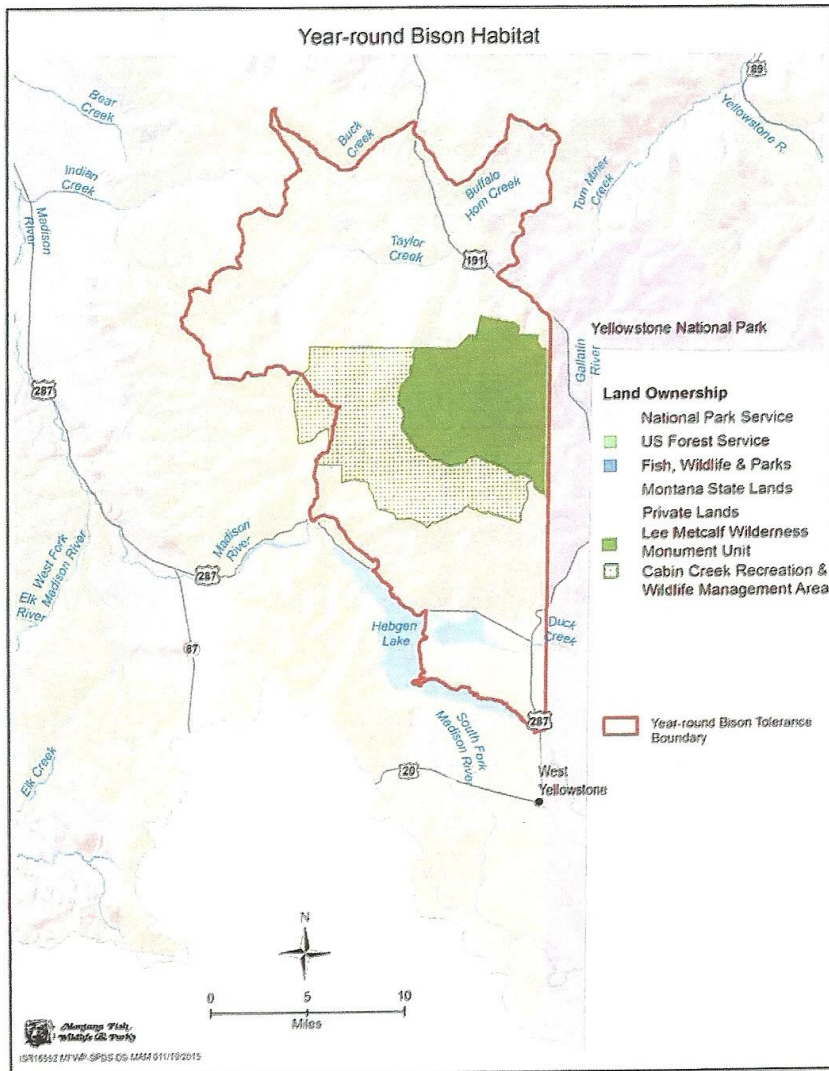
Bison should have a viable, breeding population on the Custer Gallatin, and should be listed as a Species of Conservation Concern. Bison are obviously a native animal and an extremely important part of the ecosystem. Bison have been important to people in North America for as long as people have existed here. They were the life blood of many Native American nations. Bison remain a potent symbol of wild nature and a source of sustenance and inspiration to both resident and visitors.

These magnificent animals were nearly extinct in the wild by 1903, when only about 23 wild bison remained in Yellowstone. Even now their wild range is highly limited and they are restricted from occupying their native range by intolerance and politics rather than biology or lack of habitat.

According to the 2015 bison management decision, signed by Montana Governor Bullock, "YNP bison will have year round access to Horse Butte, and north along US Highway 191 up to and including Taylor Fork Drainage, as well as the Cabin Creek Wildlife Management Area and the Monument Mountain Unit of the Lee Metcalf Wilderness (year round tolerance has been allowed in the Cabin Creek and Monument Mountain areas since the original IBMP in 2000) (Decision Notice, Year Round Habitat for Bison Environmental Assessment, November 2015). The Year Round Bison Tolerance area also includes Buffalo Horn Creek in the Gallatin Range.

Yet to this point there are bison using only the Horse Butte area, which is isolated by Hebgen Lake. One lone bison bull has been seen wintering on the Upper Gallatin River in Yellowstone Park these past 2 winters (personal communication with friends who have seen it). Bison should be somehow encouraged (reintroduced?) into the Taylor Fork and Buffalo Horn areas, or these designations as "tolerance areas" mean little. Returning bison to these lands would greatly enhance the health of the land and its usefulness to other wildlife, and provide opportunities for hunters and wildlife enthusiasts that do not currently exist.

Bison habitat connectivity should be a standard on the Custer-Gallatin National Forest, not some slippery "guideline" with no teeth.



Grizzly bear

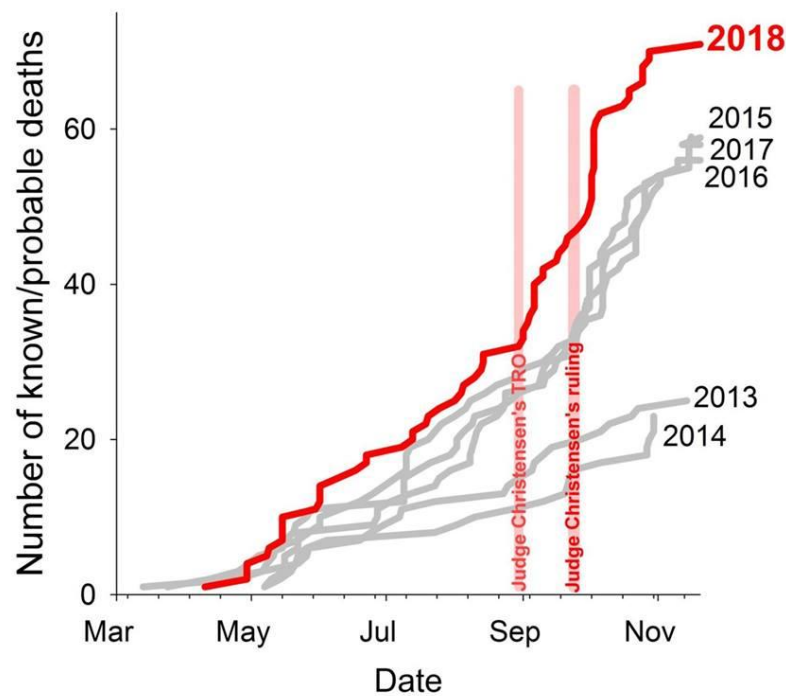
The Greater Yellowstone area is the southernmost population of grizzly bears in North America. *Ursus arctos horribilis* in Greater Yellowstone are isolated from other populations of grizzlies by human development and presence. The Primary Conservation Area for this species (which is, remarkably, still listed as Threatened under the Endangered Species Act) includes some of the Custer Gallatin Forest while the Demographic Monitoring Area includes most of the western half of the Forest south of I-90.

It's no secret that grizzlies travel and visit and even occupy areas outside of their recognized habitat. I found 2 sets of grizzly bear tracks on the Bozeman Creek trail in the fall of 2017, showing the bears traveled right up the main trail for about 3 miles.

Grizzlies need room from humans, but can be adaptable. The Custer Gallatin has a responsibility to assure the continued presence of grizzly bears in the Gallatin, Absaroka and Madison Ranges. More cooperation

with neighboring agencies, particularly Yellowstone National Park, could help offset some of the problems grizzlies are facing here.

The biggest problem grizzlies have to deal with, other than the long term specters of climate change and habitat loss, is human-caused mortality.



This figure shows the cumulative death toll for grizzly bears each year 2013-2018 with the passage of time from when they emerge from their dens in the spring to when they hibernate during the fall. Death tolls during 2015-2017 shattered all previous records, but these records were in turn shattered during 2018 when 71 grizzlies were recorded as being killed in the GYE.

As you can see grizzly bear deaths are reaching epidemic levels, threatened the persistence of the Yellowstone population.

Again, what can the Custer Gallatin Forest do? Enforce food storage orders for one. Install more bearproof food boxes for another. But possibly the best strategy is to set aside as much Recommended Wilderness as possible, such as in Alternative D.

The Custer Gallatin could also phase out livestock grazing entirely. Livestock grazing and associated predator control has long been a source of grizzly bear mortality.

According to Chris Servheen, former grizzly bear recovery coordinator for US Fish and Wildlife Service, "High speed and quiet human activity in bear habitat is a grave threat to bear and human safety and certainly can displace bears from trails and along trails. Bikes also degrade the wilderness character of

wild areas by mechanized travel at abnormal speeds. I do believe mountain bikes are a grave threat to bears – both grizzly and black bears – for many reasons.” (3)

Wolverine

A rare and amazing animal that still persists in the Custer Gallatin is *Gulo gulo*, the wolverine. I have seen them in the Gallatin Range, and tracked them with Wild Things Unlimited in the Gallatins, Absarokas, Crazies, Bridgers and Madisons. They are highly intolerant of humans and disturbance, as well as dependent on deep snow pack to raise their kits.

According to Wild Things Unlimited, “Data collected by WTU in the central portion of the Gallatin Range during three consecutive winters (1997-98, 1998-99, and 1999-2000) suggested that wolverines may have been avoiding roads and snowmobile trails, logged habitat, and/or areas of high human use (Gehman and Robinson, 2000). Within the three-year period, all of the wolverine detections occurred in a relatively undisturbed, unmanaged forest zone that existed above a lower elevation, heavily used, managed zone, despite the fact that extensive surveys were conducted in the managed zone. The managed zone contained a high density of logging roads and timber harvest units, and a system of groomed snowmobile trails that received a high level of use from December through April, while the unmanaged zone was free of roads and timber cuts, and received only light non-motorized human use during the winter.” (5)

This is a well documented case of wolverines keeping to the wild, undisturbed country, of which there is less all the time. Preserving as much of the landscape as possible in Wilderness via Alternative D or something close to that would help give these inspiring animals a chance to persist.

Wolverines may no longer be present in the Bridger Range, at least not any breeding population, due to intensive winter recreational use of the range. We tracked and photographed (with game cameras) wolverines in the late 90s in North Cottonwood and Brackett Creek drainages.

Canada Lynx

With such a tiny population left lynx may or may not even be present on the Custer Gallatin, where we currently have most of our native mammals still in existence. This could be one of the first species to “wink out” and disappear from the snowy woods of the Custer Gallatin. Care should be taken to minimize disturbance of their habitat. There are already far too many snowmobiles invading lynx habitat, where they can create packed over snow trails for bobcats, coyotes and other competitors to invade lynx habitat and steal their prey.

I have tracked lynx in the Mill Creek drainage years ago, but according to Wild Things Unlimited that was probably one lone lynx that is now long gone. These rare cats give us a lodestone to look toward – wild, shy, rare creatures that move with beauty and grace. Though we never see one their presence is enough to make the landscape more alive and mysterious.

Bighorn Sheep

I’m encouraged to see there are no domestic sheep grazing allotments anywhere near bighorn sheep habitat on the Custer Gallatin. Bighorns are notoriously susceptible to disease from domestic sheep and

goats, especially pneumonia. Bighorns should be reintroduced to the Bridger Mountain Range. Even though Bighorn sheep are well known to be susceptible to disease from domestic sheep and goats, on page 433 the DEIS states

“Under existing plans, domestic sheep and goats could be permitted on grazing allotments in some areas where disease transmission between domestics and wild sheep could occur.”

Why would you even consider doing this? Bighorn sheep are below 2% of their original populations nationwide, and are subject to a variety of stresses including fragmentation of populations and habitat, possible competition from exotic mountain goats, encroachment by conifers and noxious weeds, and human disturbance.

The perils faced by Bighorn sheep are yet another reason to choose Alternative D, which offers the best hope for preserving and possibly expanding Bighorn Sheep populations. Meanwhile the Custer Gallatin should endeavor to limit disturbance of bighorn sheep especially in winter range, and make every effort to work with private parties to keep domestic and wild populations well separated.

We don't want to see the situation here that happened in the Tendency Mountains on the Beaverhead Deerlodge, where bighorns had to be all destroyed in order to reintroduce a disease-free population. Much cheaper and more humane to protect the sheep we have got!

Wildlife Corridors and Habitat Connectivity

The northern end of the Gallatin Range is a crucial linkage in a wildlife travel corridor stretching along the Rocky Mountain from Utah to the Yukon. Your own connectivity maps in the DEIS show this to be true, with a major pinch point for wildlife migrations around Trail Creek/Bozeman Pass. Yet this linkage is in danger of being almost completely severed by traffic on I-90, recreational pressure in the Bridgers and the Chestnut Mountain/Bear Canyon area, and housing development in the Trail Creek and Bangtail Mountains area as well as logging and road building on private land in the Bangtails.

Connectivity is essential for the long term health and survival of most of our large wild animal populations. Without it they face the threat of long term loss of genetic viability. Habitat Connectivity must be a Standard and one of the guiding principles behind all management actions on the Custer Gallatin National Forest. How are you going to achieve this connectivity, or even maintain what exists? This is not clear.

One way to help achieve connectivity is to work closely with nearby national forests to assure coordinated habitat goals across large landscapes.

The Custer Gallatin needs to work with neighboring landowners and the state Highway Department to facilitate long term wildlife migration through this crucial corridor. Ultimately one or two highway crossing structures for wildlife are needed on I-90. The Forest Service could contribute expertise and money to this worthy goal. These wildlife overpasses have been built in northern Montana on Route 93, on Highway 191 in Wyoming, on the Trans-Canada Highway in Banff, and elsewhere, and have proven

very effective at saving wildlife and reducing dangerous and expensive wildlife-vehicle collisions. More of these structures are planned for Route 20 in Island Park Idaho and elsewhere.



Brand new wildlife overpass on I-90 at Snoqualmie Pass, Washington.

Forests, logging and fire

Every alternative assigns over 550,000 acres – and up to as much as 660,000 acres - as “suitable” for timber production. This is a lot of land to keep in a logging rotation. It is 18 to 22 % of the total area of the Custer Gallatin Forest. How much of that has already been logged? How long til the trees grow back, if at all? A lot of that is in roadless areas where logging would have to be minimal or non existent so why even include it?

The DEIS on page 631 states “Timber harvest is often the tool for reducing fire risk through a reduction in fuel loading.” This assumes that a reduction in fuels via timber harvest can actually affect fire behavior. Yet studies show that most wildland fire occurs during extreme conditions mixing drought, wind, heat and lightning strikes, when nearly any sort of forest (or any fuel for that matter, including homes and cars and other buildings) is going to burn.

Pretending that commercial logging is an effective way to control fire does no one any favors. Commercial logging targets the biggest, best trees since their wood is valuable for lumber. But these are some of the same trees that are most resistant to fire. Removal of these larger trees dries out the rest of the forest and opens it to more wind. Wind and drought play a major role in the severity and intensity of fire.

Nor is logging on the Custer Gallatin an efficient use of taxpayer funds. According to the Center for Sustainable Economy, the federal logging program on National Forest and BLM lands costs taxpayers nearly \$2 billion per year (2). Logging in a cold harsh climate like Southern Montana is always going to be a money loser and cannot operate without federal subsidies. Logging is often disguised as “restoration” or “forest health” or “salvage” or “thinning” some other euphemism, but you can also put lipstick on a pig, and it is still a pig. And it all loses money on federal lands.

Dr. John Talberth, Senior Economist from the Center for Sustainable Economy, said “Federal forests represent the last remaining islands in a sea of forestlands degraded by industrial logging activities on state and privately owned lands. Our federal forests are far more valuable as carbon sinks, recreation destinations, wildlife habitat and natural water filters than they are for timber production. As such, the economic damage from these logging subsidies is twofold: taxpayers lose money and local economies lose opportunities to diversify and use the land for much more valuable purposes.” (2)

Summary

Ms. Erickson, this is where the rubber hits the road. The plan you craft and implement must assure that this magnificent, fragile, diverse and threatened landscape we call the Custer Gallatin National Forest can endure the next 25 or 30 turbulent, uncertain years. What lies ahead is anyone’s guess, but we can be sure the climate and the human population and the nearby urban landscapes are going to change radically in that time period.

How to craft a plan that can help the land weather these storms? This is not an easy task, but the framework and the protocols are in place. Choose with restraint, side with biodiversity and proceed with caution and the wildlife and people that depend on this place may still recognize it and benefit from it when the next forest planning process begins.

Phil Knight

For Montanans for Gallatin Wilderness

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