

**To:** Custer Gallatin National Forest Planning Team

**From:** Lisa Landenburger

**Re:** Draft Environmental Impact Statement for the Draft Revised Forest Plan

**Date:** May 27, 2019

Thank you for this important opportunity for public comment on the proposed revisions to the Custer-Gallatin Forest Plan. I feel a responsibility to submit my strong endorsement of Alternative D based on its inherent ecological value, particularly as it applies to habitat and wildlife protection in the Gallatin Range and surrounding wildlands.

Aldo Leopold famously stated that “*wilderness is the raw material out of which man has hammered the artifact called civilization*”. The Hyalite-Porcupine-Buffalo Horn Wilderness Study Area in the Gallatin Range is an exceptionally unique vestige of high-quality wildlife habitat that has yet to feel the full impact of the human hammer. Land managers and the broad community of public land users both have a responsibility to provide the best protection to this relatively undisturbed area. This responsibility is best met by maintaining the legal protections that have been garnered over the decades through the Wilderness Act.

With the conservation measures proposed in Alternative D, the Gallatin Range, as well as the Bridger, Bangtail, and Crazy Mountains, may better serve as critical stepping stones facilitating movement and genetic exchange between the grizzly bear populations in the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem to the north. The Yellowstone grizzly bear is an island population surrounded by a sea of humanity. The Interagency Grizzly Bear Study Team (IGBST) reports that approximately 86% of all adult grizzly bear mortalities are human caused. The ability to connect with other populations is continuously threatened by the ever-expanding anthropogenic hurdles that further isolate it. Preserving wild landscapes with little to no disturbance (i.e., minimal human access) is critical for the long-term viability of this magnificent conservation-reliant population.

Alternatives B, C, and E, by recommending higher acreage of *Backcountry* and *Recreation Emphasis* Areas, facilitate and accelerate further encroachment of humans deeper into critical wildlife habitat. In particular, increased mechanized-motorized access facilitates the proliferation of unauthorized user-created routes that serve as myriad unmanageable pathways into previously undisturbed habitat

(a problem exacerbated by agency lack of staff and funding for enforcement). This results in further wildlife displacement from and disturbance to critical habitat. In addition, it sets the stage for more frequent human-wildlife encounters and conflicts. For the Yellowstone grizzly bear, these conflicts usually lead to the bear's demise.

I appreciate the challenge that Custer-Gallatin National Forest land managers face in reaching a balance between the many competing interests at stake when deciding the future management of this special place. Alternative C, while judiciously striving to bring the interests and wants of all stake holders to the table, falls short because of one glaring omission. There is no seat at the table for a voice representing wildlife needs ***independent of human needs***. The underlying assumption of Western speciesist thought is that value can be ascribed to wildlife and its habitat only insofar that it benefits human beings. I reject this assumption of wildlife and ecosystem commodification. Instead of a management alternative that is decidedly anthropomorphically biased, I advocate a policy that is based on ecologically sound principals of wildlife and habitat conservation.

It is easy for management to succumb to the pressures from so many human-focused interest groups, but once an area is opened to increased human access, it will never be relinquished. Science shows that one of the most effective means for improving wildlife habitat and survival rates is to close roads and trails to motorized and mechanized use. We cannot risk sacrificing the success of grizzly bear recovery or the gains we have made with wilderness preservation, and hence ecosystem function, for ever more human play areas, especially when opportunities for mechanized-motorized recreation are already abundant in the Custer-Gallatin National Forest and surrounding region. The health of our forest ecosystems and their inhabitants depend upon the wisdom and foresight of land managers to execute the precautionary principle of doing no harm. Alternative D is the only ecologically and environmentally visionary Alternative in that it maximizes wilderness protection to ensure ecosystem and endangered species preservation. For this reason, I strongly support Alternative D.