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Comments:

Custer Gallatin Forest Plan Comments

May 28, 2019

I request that the U. S. Forest Service recommend 230,000 acres of roadless lands as Gallatin Wilderness (Alternative D). It is the last major roadless area in the northern Greater Yellowstone Ecosystem and provides critical wildlife habitat and other ecological values.

Currently, a mere 2.7 % of the lower 48 states is designated as Wilderness. And, 230,000 acres is comparable in size to some of the private land holdings of wealthy, out-of-state investors.

We are fortunate to have had a visionary like Theodore Roosevelt who saw the value in preserving unfettered lands for present and future generations. These wild places provide us solace and beauty and it is the wildlife that is valued by Montanans and visitors alike. Now it is our turn to protect this rare vestige of pristine, natural country.

Wildlife viewing is one of the top tourism boosts to the Montana economy.

Wilderness areas not only provide safe habitats for wildlife and myriad fragile flora, they provide a peaceful sanctuary, undisturbed by the effects of humans.

The remaining wildlife that exist in these areas (including wolverine, bighorn sheep, elk, mountain goats, pika, lynx, cutthroat trout and grizzly bears) are already being pushed to the limits of their resilience by the continued encroachment of human activity, loss of habitat and climate change.

This recommendation is largely for them. They don't have a vote but, they are impacted the most. Perhaps each sub-group (animals, forests, water systems) will need their own individual legal representation to protect their interests against the barrage of human-related abuses of their habitats.

The Forest Service must provide the current levels of protection for sensitive species in their native ranges that are already mandated.

Alternative D provides the best protection for Wilderness status. Once an area has been effected by helicopters, extraction equipment, mountain bikes, etc. that status is forever compromised. There will be no 'do-overs'. Wilderness designation is the 'gold standard' and is favored by a majority of Montanans.

Wildlife need connecting, migratory corridors to prevent them from being isolated from others of their species.

This is necessary to promote biodiversity, healthy genetic populations and climate adaptation.

Please reference the Sunday, May 12, 2019 edition of the Bozeman Daily Chronicle, where 97 renowned, respected and credentialed experts in biology, wildlife advocacy and science endorsed Alternative D. As they stated: "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."

Dr. Chris Servheen, who spent four decades with the U.S. Fish and Wildlife Service's Grizzly Bear Recovery Team, has spoken out strongly against mountain biking in these areas. He told the Mountain Journal (May 22, 2019), "I do believe that mountain bikes are a grave threat to bears-both grizzly and black bears-for many reasons. high speed and quiet 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."

Brad Treat was fatally mauled by a grizzly on June 29, 2016 after he collided with the bear just outside Glacier National Park in Montana. It is estimated that he was traveling at between 20 and 25 miles per hour and rode

into the grizzly on a sharp turn in the trail that gave him only a second or two to react. High speed and quiet travel are the very conditions that are advised against to be safe in bear habitat.

The Board of Review's report regarding Treat's death stated, "There is a long record of human-bear conflicts associated with mountain biking in bear habitat including serious injuries and deaths suffered by bike riders. Both grizzly and black bears have been involved in these conflicts with mountain bikers." So, it is not just a matter of wildlife displacement, but human safety as well.

My own experiences encountering mountain bike riders reinforces this. On many occasions I have had bikers come up behind me, travelling at high rates of speed, and yell (at the last second), "Left" or "Right", whichever side they plan to pass on. They pass by very close to you, so if there were any mistakes made, the consequences would be dire. This is particularly dangerous for people who are hard of hearing, children and certainly wildlife.

The impact and threats that mountain biking pose did not exist in 1964 when The Wilderness Act was passed. But, if they had been, it seems obvious that their use in designated Wilderness would have been excluded.

Servheen states, "Wild public lands that currently have grizzly bears present have bears because of the characteristics of these places" visual cover, secure habitat, natural foods, spring, summer, fall and denning habitat. All these factors can be compromised by excessive human presence, high speed and high encounter frequencies with humans."

Mountain bikers already have hundreds of miles of options within close proximity from Bozeman and Big Sky. Throughout the entire ecosystem, there are thousands of miles of old roads available. 95 % of public lands are open to motorized and mechanized recreation. Conversely, wildlife do not have such options.

Servheen cites the fact that adult male bears often seek and occupy the most secure back country areas which forces sows with cubs into areas closer to humans and human disturbance as they try to avoid the adult males.

In 2007, Jeff Marion and Jeremy Wimpey published "Environmental Impacts of Mountain Biking: Science Review and Best Practices." In it they state, "Trails and trail users can also affect wildlife. Trails may degrade or fragment wildlife habitat, and can also alter the activities of nearby animals, causing avoidance behavior in some and food-related attraction behavior in others. While most forms of trail impact are limited to a narrow trail corridor, disturbance of wildlife can extend considerably further into natural landscapes. The opposite conduct in wildlife-avoidance behavior-can be equally problematic. Avoidance behavior is generally an innate response that is magnified by visitor behaviors perceived as threatening, such as loud sounds, off-trail travel, travel in the direction of wildlife, and sudden movements.

When animals flee from disturbances by trail users, they often expend precious energy, which is particularly dangerous for them in winter months when food is scarce. When animals move away from a disturbance, they leave preferred or prime habitat and move, either permanently or temporarily, to secondary habitat that may not meet their needs for food, water or cover. Visitors and land managers, however, are often unaware of such impacts, because animals often flee before humans are aware of the presence of wildlife."

Matthew Schmor from the University of Calgary summarized survey data he collected from 41 individuals who had interactions with bears while mountain biking. He found that 76 percent of mountain bike riders had not contacted officials about their bear encounters. This is significant because over time, bears that have been disrupted may abandon prime habitat for areas with less food and security. Poor nutrition and a more stressful environment can result in fewer full term pregnancies and fewer bear cubs.

Gary Tabor of the Center for Large Landscape Conversation in Bozeman said, "I think mountain biking and rapid recreational expansion into the backcountry is symptomatic of a growing push to build roads and sub-roads and trails everywhere we want to go without regard for the other beings out there and the high values inherent in leaving those places alone. He said the thinking about wildness has changed in an era focused on personal use and extreme athleticism. Lost is a literacy and understanding of ecology, an empathy for what uncommon creatures need in the rare spaces they're able to inhabit.

The Greater Yellowstone Ecosystem (GYE) is a one-of-a-kind area on the planet. It is home to the full set of species that were here before the European expansion. In other words, in the larger perspective, it can be considered precious-a gem that we can still bestow to our children and grandchildren. There is no more wilderness being created, but human demands and encroachment will continue to threaten and erode existing wild lands.

In the 90s where checkerboard ownership was being addressed in the upper Gallatin, the intent was for Buffalo Horn/Porcupine to be included in wilderness. The result of these trades was the formation of the Yellowstone Club. And, now, it appears, that Buffalo Horn/Porcupine will not get the protection that was intended? This is contrary to the spirit of the trades and is not acceptable.

The Gallatin Range is essential wintering and birthing ground for some of the largest elk herds in the nation. It contains 23 animal species listed as endangered, threatened or sensitive in Montana and provides critical

watershed values. This will become an increasingly important issue in times of drought and shortages of potable water.

Some other considerations:

The Forest Service does not possess the resources to monitor other use designations such as "Backcountry" or "Recreation Emphasis Area". The disruption and damage that would occur cannot be undone.

The I-90 corridor between Bozeman and Livingston should be designated a permeable barrier to wildlife to enhance connectivity to the north with significantly reduced danger of injury or death on the Interstate.

The chances for fires increase with the hotter, drier weather patterns projected in the Montana Climate Assessment. Timber harvesting dries out a forest faster than leaving it intact. And, timber harvesting increases the release of carbon into the atmosphere, exacerbating climate change.

Wilderness and National Parks are the best -suited environments to protect natural communities of plants and animals as well as the water supplies needed by human communities from the effects of climate change.

To quote biologist Lance Craighead, ".humankind has become so dominant in terms of procreation, exploitation, alternation and recreation, that we are causing the rapid extinction of species worldwide and reducing the distribution of many others to small islands of habitat surrounded by a growing sea of humanity.

As the dominant species we have a responsibility to be good stewards of other species; if only to keep the planet healthy for ourselves. Wildlife did not get to vote with GFP. They would have held out for Forest Plan Alternative D, which is their best bet."

I concur with the above quotes and urge that Alternative D be the recommended course of action to provide maximum protection for the Custer Gallatin Forest Plan.

As an aside: Early in this campaign, I received an email from the Gallatin Forest Partnership. I signed their petition not knowing at that time the diverse use agenda they were promoting. When I went to their website to ask that my name be removed, there was no way to communicate with them other than to sign your name as a supporter. So, to be clear, I do not support the Gallatin Forest Partnership plan.

I recommend the Custer Gallatin National Forest, Forest Plan Revision, Alternative D. be chosen.

Thank you for the opportunity to comment.