

# Citizens for Balanced Use

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Forest Plan Revision

Comment from Citizens for Balanced Use

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Custer Gallatin Forest Supervisor

Please accept the following comments on behalf of the more than 6000 members of CBU in regards to the proposed Custer Gallatin Forest Plan DEIS. Include these comments in the administrative record and keep CBU informed as this process continues to evolve.

CBU is a multiple use advocacy organization formed in 2004. CBU is a 501 (c) 3 non-profit organization dedicated to preserving multiple use recreation, promoting active forest management, and supporting responsible resource development on our federally managed public lands.

The Forest Plan DEIS is flawed in its development and violates several federal laws and acts.

Before the DEIS was even released to the public it was clear the Forest Service had determined the amount of closures necessary to satisfy the environmental groups in order to possibly avoid litigation. Much like the Beaverhead Deerlodge National Forest when Tom Tidwell was Forest Supervisor and CBU met with Mr. Tidwell early in the process and we were told the Forest Plan needed to have approximately 500,000 acres of additional recommended wilderness in order to appease the wilderness advocates. The Custer Gallatin National Forest is adhering to this same predetermined outcome. Even though the range of alternatives differ in designations and recommendations, the final result will be significant areas of recommended wilderness and wild and scenic rivers.

Not based on science or on the data provided through their own Specialist Reports, the Forest Service rather is working to try and justify their predetermined decision. The DEIS in this process, as required by NEPA, is to provide the public with a range of alternatives in which the agency can then analyze. The decision then becomes a mix of the different alternatives to produce a modified alternative in which each component has been reviewed and the public afforded the opportunity to comment.

The problem with the current DEIS is the simple fact that no alternative increases areas of multiple use. There is no alternative that would increase areas of multiple use recreation for both motorized and mechanized use. No alternative which increases grazing opportunities. No alternative which increases areas for timber harvest and fuel reduction. No alternative which increases areas for mineral, oil, and gas development. **Each alternative in the DEIS proposes to restrict and further regulate these interests out and off of the Custer Gallatin National**

**Forest.** The pro multiple use public was not given an alternative that would increase areas for multiple use recreation and active management.

CBU is an organization dedicated to educating the public on the benefits of access to our federally manage public lands. Access to these lands must be provided to everyone including those with physical disabilities. The DEIS is discriminating against those individuals in need of motorized and mechanized transport. The elderly, handicapped, and disabled are being incrementally closed out of their public lands. Through the past travel plan adopted by the Forest Service nearly 10 years ago closed 50% of the trails once open to motorized use. Now this Forest Plan proposes to close even more areas to the historic access and use once allowed.

From the beginning the Forest Service has stated they will not and are not revisiting the previous Travel Plan decision. This is important because the Travel Plan decision is now driving the new Forest Plan. Even as the Forest Plan is the broad over view of land use activity, the previous Travel Plan decision restricted trail use designation which is now being carried forward. For example, the new proposed Forest Plan states that in Backcountry areas in Alternatives B, C, D, and E that no new motorized trails will be constructed and motorized use will only be allowed on those trails with existing motorized use. So, in fact the new proposed Forest Plan is making sight specific detailed route restrictions.

In addition to this fact it is the philosophy and direction from Region 1 to in fact remove future motorized and mechanized use in areas designated as recommended wilderness. This philosophy from Region 1 is not consistent with other regions of the Forest Service in the nation. In fact, other regions not only allow existing motorized and mechanized use to continue in areas recommended as wilderness but other regions allow for motorized and mechanized corridors through designated wilderness areas. The overly restrictive management of recommended wilderness areas seems to be only implemented in Region 1.

Also, of concern is the past interim order which removed historic motorized and mechanized use from the Hyalite Porcupine Buffalo Horn Wilderness Study Area. This was to be a temporary order to provide the Forest Service with an opportunity to address the provisions of the HPBH WSA when designated and to look at the historic uses that existed prior to 1977 when the area was put into a WSA. The Forest Service has failed in addressing the use in this area that was present prior to 1977 and has turned a temporary order into a permanent restriction of both motorized and mechanized use of this area. Then through the action of this new proposed Forest Plan they have used the temporary interim order as a way to permanently remove both motorized and mechanized use of this area. Specifically mentioned in Chapter 3, page 845. Complete removal of historic pre 1977 motorized and mechanized use in the HPBH WSA is a violation of the 1977 Wilderness Study Act and truly an effort by the Forest Service to manufacture wilderness. CBU requests an alternative be provided that restores the historic motorized and mechanized use of the HPBH WSA. None of the current alternatives provide this alternative.

This has been the direction of the Forest Service in Region 1 for decades. To incrementally close roads and trails to motorized and mechanized use, obliterate roads through Rip, Slash, and Seed contracts, to install tank traps and debris, to gate, and prohibit access. In 2015 the Montana legislature passed House Joint Resolution 13 in response to an outcry from the public on the amount of closed roads and lost access the public was experiencing from our federal land



managers. The 2015 legislature assigned this study to the interim committee of the Environmental Quality Council. The final report can be found at the following link.  
<http://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf>

The final report documented an astounding 21,951 miles of roads closed by the Forest Service just in Montana since 1995. 21,951 miles of important infrastructure that was necessary for the management of these public lands but also a very important component of access for recreation. Each and every single mile of these roads was precious to some person or family. The closures of these roads negatively affected everyone.

Now that these roads are gone from the road system, the new Forest Plan revision capitalizes on these closures by designating areas of recommended wilderness and areas of backcountry use that does not allow new roads to be built or new motorized and mechanized activity to be allowed on those roads and trails previously closed in the Travel Plan. Again, a case of manufactured wilderness though the continued closures of our federally managed public lands.

Even the new DEIS is proposing more road and infrastructure closures. Many of the roads and trails closed in the previous Travel Plan were proposed and implemented closures of so-called non-system or user created roads and trails. But the Forest Plan DEIS states of page 89 of Chapter 2 under “Objectives (FW-OBJ-RT) 03 Alternative B, C, and D: Remove 85 miles of planned unneeded **system roads at an average of 10 miles per year, based on available budgets.**” And “Alternative E: Remove 5 to 20 miles of planned unneeded **system roads, based on available budgets.**” This proposed removal of more roads is not in the best interest of the public for recreation access. These roads are not non-system or user created roads but rather are currently a part of the system road inventory and are additional closures. The alarming part of these additional road closures is the fact that every alternative proposes to close addition roads and access. The public was not afforded an alternative which would leave these roads in place. In discussing this with the Forest Service they explained that these roads were planned to be closed and even the no action alternative would have closed these roads. The fact that Chapter 2 does not provide a “No action” alternative to compare the proposed actions is also of concern.

How is the public afforded the opportunity to comment on a possible alternative which would increase access when every alternative proposes to close more roads? The Forest Service has violated NEPA in not providing an alternative which increases access. NEPA requires a range of alternatives which the Forest Service failed to provide. A comment in support of any alternative would be a comment in support of more road closures. The HJ 13 study clearly shows the intent of this agency in Region 1 is to close roads to motorized use and ultimately close access to our elderly and physically challenged.

Currently there is a bill in Congress, HR7138, which emphasizes the importance of outdoor recreation for the treatment of PTSD. Montana has the highest suicide rate in the nation per capita. According to national statistics at least 20 American veterans commit suicide each and every day. If the Forest Service has closed nearly 20,000 miles of roads on the land they manage in Montana since 1995, it may stand to reason that these closures have contributed to the high suicide rate we see in Montana. If Congress is now concerned enough about this increased



suicide rate that legislation has been proposed to increase access and availability for our veterans to our public lands, then it is the responsibility for the Custer Gallatin National Forest through their new Forest Plan revision to increase access for these heroes, not reduce access opportunities. A question might be asked as to whether past road closures have contributed to the mental health and well being of the public. Areas once shared with families and friends are now closed by an agency charged with managing these lands. Their duty is to provide access for everyone and maintain this access.

CBU hears time and time again how reduced budgets have caused the Forest Service to close roads and access. While the Forest Service has dedicated millions of dollars to close and obliterate nearly 22,000 miles of roads since 1995 in Montana, they seemingly can't find any money to maintain this important infrastructure. The health and social well being of the public has borne the cost as mental health issues are on the rise and suicide rates are off the charts.

The Forest Service create several Specialist Reports in the development of the DEIS. One such Specialist Report prepared by Lauren Oswald, Forest Recreation Program Manager, stated that nearly 25% of the general public did not participate in recreation due to poor health or physical disability. She also stated on page 36 of her report: **"By 2012, nearly one in three Montanans could be obese."** A clear indication of the need for outdoor recreation access. Some may argue that these people should get out and hike but in reality, it takes a family of all ages spending that quality time together to experience the outdoors and instill in one's mind those memories. Once captivated by computer games at an early age, the chance of kids developing an outdoor element in their lives may never occur. This is why it is important to provide those family members that are elderly or less physically able to recreate on our public lands the opportunity to access these areas by motorized transport. Sharing these experiences with multiple generations of a family is the basis of the life and culture of this area. The Forest Service seems determined to destroy the historic culture of this area and specifically motorized access to this forest.

I know in my life the outdoor and public land experience was instilled in me by my grandparents and parents. I passed this heritage on to my children and now my grandchildren as they now value being in the outdoors rather than playing computer games. This becomes a multi-generational process but today much of the area in the Custer Gallatin National Forest that I rode motor vehicles with my grandparents and parents is not accessible or available for me to share with my children and grandchildren. These opportunities have been taken from my family by the actions of the Forest Service. Is there a certain amount of hatred towards the Forest Service because of these actions and closures? Of course, as any normal person would feel when something so precious has been taken away, and this feeling is shared throughout our thousands of members and supporters of CBU. The need to preserve the limited areas of multiple use access to our federally managed public lands we have left is so very important.

These lands may be important to those you identify on page 9, Chapter 2 where you state "The existence of these primitive landscapes may provide for inspiration and meaning to those who value wild places, **even if they never go there.**" Is this really the Forest Service's new way of justifying closures to those of us who have a long history of being there? Being in these places with generations of family and friends. A part of our culture is being taken away because the Forest Service believes there **may** be people that never go there and **may** not want my type of



recreational access. This is no reason to destroy my way of life and my history of access to my public land. An arbitrary act by the Forest Service in closing my access because of some presumed feeling of people absent from these lands.

In looking at this predetermined closure of access to multiple use recreation we should review the comments during the scoping process and also the Forest Service Specialist Report which support expanding opportunities for recreation rather than further closures.

The Forest Service held meetings after the Travel Plan decision which asked the public to engage in a collaboration effort in deciding future management of the HPBH WSA. This Gallatin Collaborative process endured for multiple years but never came to any decision as the pro wilderness participants refused to compromise. The no compromise position of these groups brought about the dissolution of the Gallatin Collaborative.

In 2012 the Forest Service adopted a new planning rule. Known as the 2012 Planning Rule, this rule changed the process of forest and travel on Forest Service managed lands. The rule provided for a predication FEIS objection period where commenters could object to the decision and meet with the decision maker and their supervisor to attempt to mitigate their objections to the action prior to the final Record of Decision. In the view of CBU this has been another failure by the agency in developing plans that benefit both the public and the environment. Another aspect of the new 2012 Planning Rule was the inclusion by the Forest Service in including a component of collaboration. The Forest Service seemed to be making an effort to include local collaborative groups and their recommendations in the decision. A more local based decision and possible local support for the decision.

The problem results when the Forest Service was provided no clear direction on how to treat these collaborative groups and what emphasis was to be placed on their recommendations. Ultimately the Forest Service has taken different approaches to accepting and using these recommendations from collaborative groups. What is needed is to have a consistent direction from the national level of the agency in how to use the efforts and recommendations from collaborative groups.

In the Custer Gallatin there was an effort brought forth by the 9 local counties with land within and adjoining the Custer Gallatin National Forest. County Commissioners formed the Custer Gallatin Working Group and CBU had a position on this collaborative since its beginning. The Custer Gallatin Working Group adopted their bylaws and operating principals in early 2017 and has met monthly over the past 2 years. The CGWG formed a sub committee to work specifically on the Forest Plan revision and submitted extensive comments during the scoping period of the plan.

In reviewing the comments provided to the Forest Service it is clear that many of these comments, suggestions, and recommendations were not included in the DEIS. One such example of a recommendation from the CGWG that was not included can be found on page 14 of the CGWG scoping comment. In response to page 75 of the Forest Service Custer Gallatin Forest Plan Scoping document under (FW-OBJ-REC) the CGWG suggested adding a new (02) which states: "Construct or expand new recreation facilities to accommodate increasing demand." The

CGWG realized the need for expanding recreation facilities including roads, trails, camping facilities, and parking.

Not only did the CGWG recognize the need to expand recreation facilities but this was also recommended in the Recreation Settings, Opportunities, and Access Report prepared by Lauren Oswald. Specifically beginning on page 36 of the Specialist Report several statements are made and facts presented. Following are a few of those statements and facts.

- “Trails provide important connections within communities and between communities and public lands. **Planning for youth as well as the aging population will help Montanans at all stages of life and will continue to further Montana’s recreation heritage among the young and seniors. Facilities like trails can meet the needs of all ages and abilities, and this theme was strong throughout reference documents and public involvement.**”
- “Although Montanans participate in fishing and hunting activities more than the national level, data on fishing and hunting licenses indicate participation in fishing and hunting is generally declining.”
- “Motorized recreation has increased significantly from 2000, with a 300 percent increase in off highway vehicle registration and close to 200 percent increase in snowmobile registration. Nearly 30 percent of Montanans age 16 and over participate in off-highway vehicle recreation, putting Montana in the top 10 states for off-highway vehicle recreation.”

According to the Specialist Report fishing and hunting is declining and the biggest growth in outdoor recreation is in the off-highway sector. Montana demographics also support the growth in off-highway recreation as Montana’s population is aging. CBU is very concerned with the alternatives provided to the public in the DEIS as they **did not address the growing demand for off-highway recreation.** Clearly the alternatives were based on a predetermined outcome of reduced or status quo opportunities for off-highway recreation even though the CGWG collaborative and the Specialist Report suggested otherwise.

Even the Gallatin County Commission presented a letter to the Custer Gallatin Forest which stated the following.

- “As a high growth county, the need for diverse recreation opportunities will only increase in the future.”
- “We cannot support designations that will prevent the Forest Service’s ability to manage and protect **our** resources, our citizens and our economic sectors such as recreation.”
- “Experience demonstrates that restrictive designations like Wild and Scenic Rivers and Wilderness often create management constraints to lands near the designations. Our suggestion is to create a **two-mile buffer between any recommended wilderness and private or state land**, possible varied based on topography and vegetation. We are open to discussions about Wild and Scenic River designations **but currently do not support them in Gallatin County due to the impacts of private property and the loss of flexibility when need for management arises.**



The Forest Service ignored the recommendation from the CGWG collaborative. The Forest Service ignored the recommendation from the Gallatin County Commissioners. The Forest Service even ignored their own Specialist Report. The only determination a person can make from these actions is that the Forest Service had a predetermined decision to designate additional Wild and Scenic Rivers. The Forest Service had a predetermined decision to add additional recommended wilderness designations. And the Forest Service had a predetermined decision to close and remove roads contrary to local government recommendations and even their own Specialist Report.

On page 39 of the Recreation Settings, Opportunities, and Access Report prepared by Forest Recreation Program Manager Lauren Oswald states: "Many campground facilities have become outdated or are not meeting demands of today's demographic of users or vehicles. Utilization and investment in developed recreation sites should be examined in the context of desired opportunities." And also states "Many of the high popular, concentrated use areas may have been designed and developed more than 40 years ago for a different purpose, technology, or user group."

Comments from the CGWG recommended again to expand recreation facilities. Yellowstone Park visitation continues to increase and camping facilities in the Custer Gallatin have not kept pace with the expanded growth and desire for camping opportunities. Even with this information presented to the Forest Service during the scoping period, the Forest Service states on page 94 of Chapter 2, under 2.4.15 General Recreation (REC), Objectives (FW-OBJ-REC) 01, "Alternative B and C: **Remove** or relocate five existing facilities, including dispersed site, outside riparian management zones, or undertake other means practicable if they are degrading aquatic or riparian resources over the life of the plan." And "Alternative D: **Remove** or relocate seven existing facilities, including dispersed site, outside riparian management zones, or undertake other means practicable if they are degrading aquatic or riparian resources over the life of the plan." And "Alternative E: **Remove** or relocate two existing facilities, including dispersed site, outside riparian management zones, or undertake other means practicable if they are degrading aquatic or riparian resources over the life of the plan."

Clearly the Forest Service is not interested in expanding camping opportunities and providing the public with sufficient facilities to enjoy their federally managed public lands. Every alternative provided to the public for comment proposes to remove campsites or relocate existing campsites. CBU requests the Forest Service provide an alternative that would increase camping opportunities including dispersed sites as the need for increased camping facilities was clearly shown in the Specialist Report and recommended from the CGWG collaborative. Again, it seems like a predetermined decision to remove the public from this forest.

CBU believes both the action of removing roads and trail opportunities along with the proposed removal of camping facilities when comments, suggestions and recommendations from the public, the CGWG collaborative, and indicated needed by the Specialist Report is both arbitrary and capricious. CBU requests the FEIS include increased road, trail, and camping opportunities. CBU will object to a final decision that does not address this need.

The Forest Service has a difficult job in balancing competing interests when making decisions on future management of our public lands. These decisions must follow many laws, regulations and Acts passed by congress and also Executive Orders issued by the President, Secretary of Agriculture and Forest Service Chief. CBU understands the complexity of this process but we also know many decisions are based on a bias attitude within the agency and staff itself. Decisions are many times swayed by personal attitudes and agendas rather than science, fact, laws and regulations. Comments from interests not in line with Forest Service internal bias can often be ignored or minimized. Decisions based on threat of litigation is another concern of CBU. Statements such as “we have to close this area or we will be litigated” or “we can’t open this area to motorized and mechanized use because litigation will occur” are not valid reasons for Forest Service actions but rather a way to avoid making decisions on fact and science. Let’s take a look at some of these Acts and laws the Forest Service is violating in the Custer Gallatin Forest Plan revision. First and maybe foremost is the Organic Act.

*Organic Act of 1897, ( 16 U.S.C. sec. 475)*

- (a) “National forests are reserved for two purposes; To maintain favorable conditions for water and to ensure a continuous supply of timber.” The future conditions of these resources must be managed in accordance to the provisions of the Act.

This is the foundation of the Forest Service and why these areas were put in reserve. Since 1970 the favorable conditions for water have diminished and the continuous supply of timber has been reduced. Clearly the Forest Service is failing to address both the favorable conditions for water and a continuous supply of timber.

*Multiple Use and Sustained Yield Act of 1960 (16 U.S.C. sec. 528)*

- (a) “Congress requires the Forest Service to manage “renewable surface resources of the National Forest for multiple use and sustained yield of the several products and services obtained there from.” Multiple use of resources that are provided to the people of the United States under the Act must be upheld.

The Multiple Use Sustained Yield Act is another law the Forest Service has failed in following. Arbitrarily designating areas off limits to surface resources has adversely affected economies of local communities dependent on these resources. Adverse effects to the social and cultural values of communities have diminished over time by the continued closures of these federally managed public lands for access to these surface resources. The Forest Service in violating the Multiple Use Sustained Yield Act over time has compounded the impact through a cumulative effect.

*Wilderness Act of 1964*

- (a) “While the wilderness act of 1964 set aside areas to be left un-managed, we must insure in future planning, that the other federal lands do not become defacto wilderness areas.” All other public lands must remain under the management of the multiple use concept.

The Gallatin portion of the Custer Gallatin National Forest is comprised of 714,000 acres of designated wilderness and another 740,000 acres of designated Roadless Area which was put in place during the President Clinton administration. Of the 1.8 million acres in the Gallatin National Forest, 1.454 million acres is restricted to most recreational activities, timber harvests,



extensive grazing regulations, restrictions on mineral and oil and gas development. The remaining 346,000 acres is all that is left for development of additional multiple use recreation, timber harvest, additions to grazing, and mineral development. Not much of a balance of access to our surface resources.

Notice the statement in the Wilderness Act that states all other lands outside of designated wilderness must remain open to the multiple use concept and not become defacto wilderness. The Forest Service in their management direction in the new Custer Gallatin Forest Plan revision is to remove motorized and mechanized use in areas they recommend for wilderness. This is a clear violation of the 1964 Wilderness Act.

The designation of Wilderness is solely under the jurisdiction of Congress. When the Forest Service began the scoping process on this plan, they informed the public and the CGWG collaborative that they were completing an eligibility and suitability analysis of additional recommendations for Wild and Scenic Rivers. Designation of Wild and Scenic Rivers is another designation left solely to the authority of Congress yet the Forest Service has decided in this plan to managed these Wild and Scenic Rivers as wild and scenic, under the same restrictions, as they were officially designated by congress.

They also informed the public and the CGWG that they were completing an eligibility study for areas they propose to designate as recommended wilderness. These areas would again, according to the DEIS, be managed as if congress had formally designated them as wilderness. A problem with only completing an eligibility study on areas recommended for wilderness and NOT completing a study on the suitability of these areas is that the Forest Service has no idea whether these areas are actually suitable to be designated as wilderness. The Forest Service is proposing to manage these recommended wilderness areas as true congressional wilderness designated areas without any analysis on their suitability. This is both arbitrary and capricious, has no legitimacy, and a clear violation of law.

An example of how the Forest Service in this area did not disclose important information to the public in looking at eligibility of areas recommended for wilderness. The process began with the first Wilderness Character study on the HPBH WSA completed by Forest Service employee Kimberly Schlinker in 2003. This analysis determined the HPBH WSA was NOT suitable for wilderness designation. The 2004 Gallatin National Forest Travel Plan closed most of this area to both summer and winter motorized and mechanized use.

The Forest Service in an effort to comply with the court's ruling on the Travel Plan litigation issued an interim order further removing summer and winter motorized and mechanized use. The court told the Forest Service they did not have any motorized and mechanized use data prior to 1977 when the HPBH WSA was designated and as such could not provide evidence in the amount of motorized and mechanized use of the area prior to 1977. In response the Forest Service basically removed all motorized and mechanized use and violated the Wilderness Study Act which allows existing use prior to 1977 to continue. At this time a very limited amount of historic summer motorized and mechanized use on a couple of trails in the summer is allowed with a seasonally closure which allows this use during a short 6-week period. No where near the historic use levels allowed in 1977. Winter use is limited to the historic Big Sky Snowmobile

Trail which is on the National Historic Trail Register. This trail would probably be closed too except for the fact it is recorded in the National Register.

Fast forward to 2011 when the Forest Service partnered with the University of Montana Wilderness Institute to complete an inventory of existing conditions and facilities within the HPBH WSA. CBU met with the members of this study group upon their completion of the inventory. This meeting occurred at the Buffalo Horn Trailhead in the summer of 2011. CBU questioned the survey crew as to how the survey was conducted, what equipment was used, how the data would be compiled, and when this report was due to be released. The survey crew was asked at this time "What was the most surprising thing you found while doing your inventory?" The answer was that during their multiple day stay in the HPBH WSA they experienced noise intrusions from low flying commercial aircraft on a frequency of 1 every hour, 24 hours per day.

In following up on this observation CBU contacted and met with the airport manager of the Gallatin Airport. This airport is the busiest and fastest growing airport in the state. The airport manager confirmed the survey crews' observations as the flight path over the HPBH WSA was the main incoming flight path from hubs south of Bozeman including Salt Lake City and Denver. Other flight path routes to the south have been added since this survey in 2011. The air traffic into the Gallatin Airport is not only commercial passenger but the data from the airport showed more than half was commercial freight and also corporate jets servicing Bozeman and the community of Big Sky. Since 2011 passenger flights have increased, more airline companies have been added, the terminal has been expanded, aircraft hangers have been constructed, and with the growth of Amazon and other overnight delivery services for freight the air traffic in and out of this airport has increased significantly since 2011.

CBU understood from the survey crew that the release of the final report would occur sometime in 2012 and we patiently waited for this document as we were confident the low aircraft flights would preclude any sort of recommendation as wilderness for this area and we may be able to gain our historic access to this area. But in October of 2012 when the study was released, the noise intrusions recorded by the survey crew were missing from the report. CBU knew these noise occurrences were recorded by the survey crew because during the meeting with this crew at the Buffalo Horn Trailhead the crew informed us of this fact.

CBU contacted the Forest Service to question why this data was withheld. The Forest Service told CBU this data was in fact recorded in the field notes but was withheld from the final report. This is the Forest Service response:

"Reason not used: During the summer of 2011, Wilderness Institute field crews opportunistically monitored the duration and intensity of noise intrusions within the HPBH WSA. Field crews recorded a total of 182 motorized noise intrusions. The majority of recorded noises were from airplanes (89%), with the remaining attributed primarily to vehicles (6%) and helicopters (2%). The opportunistic nature of this data collection precluded any kind of repeatable. Standardized survey of auditory intrusions."

CBU believes the only thing opportunistic about this data not being used was the fact this data showed a clear lack of wilderness suitability for the HPBH. CBU requested a copy of the field



data from the Forest Service. We were told several times that the Forest Service would provide this information to CBU. After several requests to Kimberly Schlinker and Gallatin Forest Supervisor Mary Erickson with no results we contacted Region 1 Supervisor Leanne Martin. The Forest Service continued to withhold this information and only after contacting offices in Washington D.C. and our congressional delegation were we provided the field note information.

WE believe the actions by the Forest Service in attempting to withhold this information was intentional in an effort to hide the fact the HPBH WSA did not meet the eligibility requirements of wilderness. The statutory language of the 1964 Wilderness Act is to identify the 4 qualities of wilderness. They are “untrammeled, natural, undeveloped, and solitude.” CBU is in possession of the field notes collected in 2011 and the frequency of low audible flights over the HPBH WSA is astounding. For example, from the field note records:

“August 6, 2011, 1-5 minutes, hear clearly, visual observation, airplane”.  
And included in this field note was this statement on that same observation.  
“3 airplanes during 1-hour lunch”.

On another occasion and an additional entry in the field notes had the following:

“August 13, 2011, under 1 minute, hear clearly, auditory only, airplane”  
And included in the field note was this statement on the same observation.  
“airplane, heard many throughout the night”

The point of this discussion is quite simple. The Forest Service has released the Custer Gallatin Forest Plan DEIS for public review and comment. None of the alternatives provide for restoring the historic motorized and mechanized use in the HPBH WSA. Alternative B, C, and D recommend the HPBH WSA as wilderness and Alternative E proposes the area as back country with back country only allowing motorized and mechanized use on trail currently allowed for this use. The Forest Service implemented an interim order removing motorized and mechanized use on trails in the HPBH WSA and the interim order also removed historic winter motorized use in the HPBH. Because of the interim order action and the management decision of removing motorized and mechanized use in recommended wilderness areas, the public is not afforded the opportunity to support any alternative because of the nature of these alternatives.

**CBU requests the Forest Service provide an alternative that restores the motorized and mechanized use of the HPBH WSA.**

**CBU requests the Forest Service release the field notes to the public from the study completed in 2011 by the University of Montana Wilderness Institute.**

**CBU requests a complete internal review of why the flight data recorded by the U of M Wilderness Institute was NOT included in the final report.**

**CBU requests that any and all areas recommended for wilderness have a suitability analysis completed prior to recommendation for wilderness.**

The lack of a suitability analysis raises another alarming fact. When the Forest Service met with the CGWG they told the collaborative that all Wild and Scenic River recommended in all alternatives would be the same and the Forest Service was conducting not only an eligibility analysis of Wild and Scenic Rivers but also completing the suitability analysis. Suitability analysis is required by congress become congressional designation of either Wild and Scenic designation or designation of wilderness. Because the Forest Service did not complete the suitability analysis of areas they are recommended for wilderness, these recommended areas for wilderness in the alternatives are arbitrary and capricious.

Recommended wilderness in all alternatives is different. The Forest Service is asking the public to comment on each alternative expecting the Forest Service has done due diligence in evaluating the wilderness character of these areas and completing an analysis on their suitability. These recommended wilderness areas being different in each plan clearly shows the Forest Service has not completed the necessary and required suitability analysis of these areas. The fact that the Forest Service has withheld the field notes from the 2011 study and omitted them from the final October 2012 report is an indication the Forest Service is not being transparent and honest with the public.

These actions have a profound affect on multiple use recreation opportunities in this forest today and well into the future. Other resources are also affected negatively by this action.

Active timber management for example is shown to have a suitable timber base of approximately 600,000 acres. (pg. 79, Chapter 2) According to the wood products industry this forested geographic area of Montana produces on average 100 board feet of new growth per acre annually. Total new growth on 600,000 acres of forested land equals 60 million board feet annually. The plan proposes to offer timber sales between 6 and 15 million board feet annually. (pg. 81, Chapter 2)

Of the 600,000 acres of suitable timber the plan proposes to treat between 5 and 8 thousand acres annually. (pg. 81, Chapter 2) The sustained yield from page 79, "Sustained Yield Limit" is said to be 38.25 million board feet annually. At the rate of harvest proposed in the plan of between 5 and 8 thousand acres per year on a timber base of approximately 600,000 acres, it would take 100 years to treat the timber base area at 1 tenth the amount of new growth generated. If full harvest rate of new growth were implemented on each timber sale to full potential yield with the estimated 6 to 15 million board feet harvest level it would increase amount of time by 10-fold. In other words, the 100-year estimate of treating 600,000 acres would be increased to 1000 years.

Yet on page 50 of Chapter 2 the Forest Service is proposing to burn 375,000 acres per decade. (pg. 50, Chapter 2, Objectives (FW-OBJ-FIRE) 02) It seems the Forest Service's preferred timber treatment is fire and this is reinforced by their statement on page 49, 2.3.12 Fires and Fuels (FIRE), Introduction states "Fire is a **primary** and necessary ecological process.....".

Clearly the Custer Gallatin National Forest Interdisciplinary Team prefers fire over timber harvesting. 37,000 acres per year burned, possible 8,000 acres harvested. But the 8,000 acres is not all timber harvest as stated on page 81, Chapter 2, where Objectives (FW-OBJ-TIM) 03 states: " Annually complete vegetation management treatments (such as, timber harvest, **planned**



ignitions, thinning, planting) on an average of ; **Alternative B and C 6,000 to 7500 acres, Alternative D 8,000 acres, and Alternative E 5,000 acres.**”

With these statements included in the Timber section of the DEIS it is not clear how many acres of timber harvest will occur compared to how many acres the Forest Service will burn. If the statement on page 50 is correct and the Forest Service believes fire to be the **primary** tool then it stands to reason the majority of the 5 to 8 thousand acres of timber harvest and treatment would be completed by fire rather than harvest. This further reduces support for mills and processing infrastructure. It is no secret the lack of timber from federally managed public lands has destroyed most of our timber processing infrastructure. Litigation currently on between 21 and 27 projects in Montana have prevented much needed fuel reduction to occur. The result of projects in litigation compounds the threat of increased fires. The Forest Service states on page 80, Chapter 2, Desired Conditions (FW-DC-TIM) 04 “Timber harvest support maintaining regional timber harvesting and processing infrastructure.” The problem with this statement is the projected harvest levels in board feet come NO where close to supporting our processing infrastructure.

CBU requests an increase in timber sale quantity from what is proposed in the DEIS.

CBU requests that timber harvest and fuel reduction projects be completed by mechanical means rather than burning. Groups and organizations claiming global warming or climate change as a serious threat to our world should look at harvesting rather than burning our forest. Page 51, Chapter 2, under 2.3.13 Carbon Storage and Sequestration (CARB) states “**Harvesting and regenerating forests can result in net carbon sequestration in wood products and new forest growth.**” We know fire has a destructive effect on wildlife and the environment.

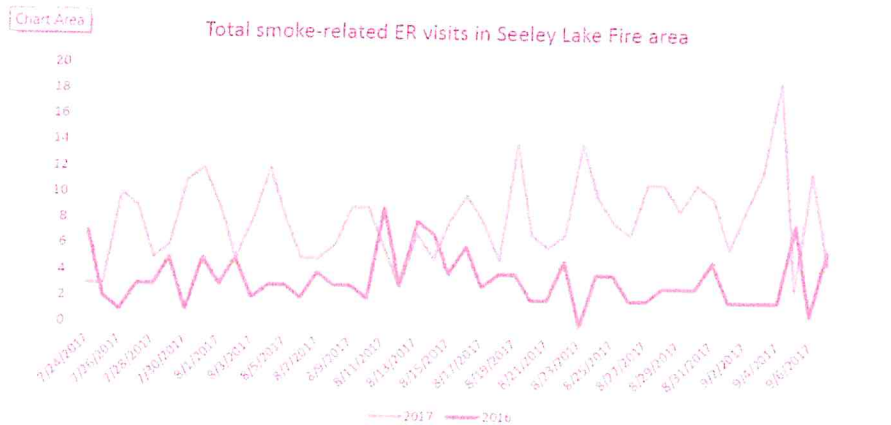
CBU has done extensive research on fire and the affects of fire on wildlife, our environment, and on human health. The Constitution of Montana states:

#### **Montana Constitution**

##### **Article II Part 2**

**Section 3. Inalienable rights.** All persons are born free and have certain inalienable rights. **They include the right to a clean and healthful environment** and the rights of pursuing life's basic necessities, enjoying and defending their lives and liberties, acquiring, possessing and protecting property, and seeking their safety, health and happiness in all lawful ways. In enjoying these rights, all persons recognize corresponding responsibilities.

The air quality in Montana is severely impacted from the smoke from wildfires every year. Smoke effects on humans in the Seeley Lake region have shown reduced lung function more than a year after the Rice fire in 2017. Increased emergency room visits were reported in a presentation to the Montana Legislative Environmental Quality Council during the 2017-2018 interim.



Deadly carcinogens are released into the air from these fires as reported by a study completed by the USDA on the effects of wildfire smoke on firefighters. Particulate matter in wildfire smoke whether from unplanned or planned ignitions are less than pm 2.5 in size. These particles are small enough to pass through the lung tissue and enter the blood stream. Crystalline silica can cause lacerations to lung tissue and heart valves causing long term complications to persons with lung and pulmonary diseases. The complete study by the USDA can be found at the following link:

<https://www.firescope.org/specialist-groups/safety/hazards/wildfire-ff-smoke-exposure.pdf>

Recent reports on the current condition after the catastrophic 2018 Camp fire which destroyed the town of Palisades, CA. Nearly a year later the water infrastructure was found to have been contaminated with Benzene. Benzene is a chemical emitted from wildfires as reported by the USDA study mentioned earlier. Following are several links to articles about this terrible condition:

<https://cen.acs.org/environment/water/Benzene-found-water-supply-fire/97/web/2019/04>

<http://www.rightinginjustice.com/news/2018/02/02/benzene-water-contamination-plagues-fire-damaged-california-city/>

<https://www.actionnewsnow.com/content/video/504077812.html>

<https://cen.acs.org/environment/water/California-wildfires-caused-unexpected-benzene/96/i26>

The Camp fire destroyed over 8000 structures and killed 44 people. Now their water infrastructure is contaminated with Benzene and replacement could take 2 years at a cost of more than 43 million dollars. This came as a surprise to officials in this area but we should heed these warning in Montana.





The Forest Service manages several million acres nationwide and catastrophic fires are becoming more frequent. Even though the Forest Service is immune to liability of both unplanned and planned fire damage, it should not be immune from the health effects caused by decades of mismanagement of our public lands.



According to the Montana Department of Environmental Quality and posted on the Montana DEQ website is the following:

[Home](#) / [Wildfire Smoke Updates](#) / **Health Effects Categories**

### Health Effects Categories

Health Effects Categories	Health Effects	Cautionary Statements
 <b>Hazardous</b>	Serious aggravation of heart or lung disease and <b>premature mortality</b> in persons with cardiopulmonary disease and the elderly; serious risk of respiratory effects in the general population.	Everyone should avoid any outdoor exertion; people with respiratory or heart disease, the elderly, and children should remain indoors.
 <b>Very Unhealthy</b>	Significant aggravation of heart or lung disease and <b>premature mortality</b> in persons with cardiopulmonary disease and the elderly; significant risk of respiratory effects in the general population.	People with respiratory or heart disease, the elderly, and children should avoid any outdoor activity; everyone else should avoid prolonged exertion.
 <b>Unhealthy</b>	Increased aggravation of heart or lung disease and <b>premature mortality</b> in persons with cardiopulmonary disease and the elderly; increased respiratory effects in the general population.	People with respiratory or heart disease, the elderly, and children should avoid prolonged exertion; everyone else should limit prolonged exertion.
 <b>Unhealthy for Sensitive Groups</b>	Increasing likelihood of respiratory symptoms in sensitive individuals, aggravation of heart or lung disease and <b>premature mortality</b> in persons with cardiopulmonary disease and the elderly.	People with respiratory or heart disease, the elderly and children should limit prolonged exertion.
<b>Moderate</b>	Possibility of aggravation of heart or lung disease among persons with cardiopulmonary disease and the elderly.	None

Air Quality Index (AQI) for BAM-2.5 24-Hour <sup>1</sup>

<sup>1</sup> Guideline For Reporting Of Daily Air Quality – Air Quality Index (AQI), EPA-454/R-99-010, July 1999, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, 27711.

As confirmed by the Montana DEQ website, the smoke from these fires are killing people. The Forest Service should not be immune from liability when it comes to human life. The Montana Governor has identified more than 5 million acres in Montana at risk of catastrophic fire event. The Forest Service is failing to address this situation and in fact in the proposed Custer Gallatin Forest Plan DEIS, the Forest Service is ignoring the urgency of reducing fuel loads and seems to be continuing business as usual by elevating a perceived wildlife conflict above human health and lives.

The Custer Gallatin Forest Plan DEIS states that fire is the preferred action in reducing fuel loads. As stated, before the Forest Service plans to burn an estimated 375,000 acres in the next decade. The DEIS failed to analyze the human health effects of this action in burning 5 times more acres than harvesting. The Forest Service failed to analyze the amount of deadly carcinogens to be released from these fires and include this in the DEIS. The Forest Service failed to analyze how much carbon sequestration could be accomplished through timber harvests and how much carbon, chemicals, particulate matter, and carcinogens would be released in burning 375,000 acres over the next decade. **CBU requests this analysis be done on health effects, chemical release, and carbon storage in timber harvests and included in the final FEIS.**

The Forest Service quotes the Endangered Species Act, Clean Water Act, and Clean Air Act when defending their decisions. Much like any well intended law or Act passed by congress the intent of the law should be taken in totality. It was never the intention of Congress to stop all active management of our public lands through the passage of these laws and Acts. They were intended to be guidance and help in the recovery of species and the protection of habitat. For example, below is the intent of such Acts.

*Endangered Species Act, Clean Water Act, Clean Air Act and MEPA*

(a) "These and other environmental laws all play an important part in resource management. While maintaining concern for the environment, we must take care to ensure that cumulative effects of these laws do not prohibit the management of our resources for future generations." It is imperative that the aforementioned laws and any other laws that facilitate resource management be held to the integrity that they were intended.

Most often these laws, Acts, and regulations are used to justify closures and a hands-off approach to management. Most often these actions result from an attitude of "management by threat of litigation". A serious look at the current situation in the Forest Service shows about 50% of their budget is spent on fire suppression and another 40% on litigation. Then the Forest Service makes statements in the DEIS like "increased congressional allocations" and "based on available budgets" when this agency at one time generated revenue. Clearly the Forest Service is a cash cow for environmental groups filing litigation and collecting from liberal judges through the Equal Access to Justice Act. Environmental groups have made litigation against the Forest Service a business. It is no longer about habitat and the environment. This cycle must change but it will take education of the public in order to break the cycle. This education is not in the form of what the DEIS proposes which states on page 50, Chapter 2, 2.3.12 Fires and Fuels (FIRE), Goals (FW-GO-FIRE) 01, "provide education about wildfire risk and **that wildland fire is an essential ecological process.**"



With all due respect who thought this type of education is important? **CBU requests the FEIS contain an education component on the benefit of timber harvest.** The benefit to wildlife. The benefit to economies and local communities. The benefit to human health. The fact the chemicals from these fires are killing people. The fact that thousands if not millions of animals are killed every year by wildfires. The fact that responsible timber harvesting benefits the landscape. The benefit of timber harvests in keeping our streams and rivers free of massive erosion that occurs after wildfires. The benefit to private property in reducing fuel loads and the risk of wildfire. The benefit of sequestering carbon through timber harvest. The benefit of providing jobs in small communities dependent on these timber harvests and mills.

There are so many benefits of harvesting timber but the Forest Service is dedicated to education on how the public MUST accept these fires. The Forest Service even includes statements believed to be fact such as climate change and global warming which is not settled science. It is very clear of the current agenda in agency and the proposed Custer Gallatin Forest plan DEIS proves this out.

There are so many benefits to harvesting timber but Montana has experienced an influx of people not aware of these facts. The Forest Service has an obligation in an education component. Wood products industry such as Montana Wood Products Association and the Montana Loggers Association attempts to provide these education materials to the public but are labeled as big industry and greedy corporations. One only need to take a look at the mills and loggers in Montana to see these are family operations we are very lucky to have working to improve the condition of our forests. The responsibility of the Forest Service is to assist these businesses and people to make sure we have the infrastructure in place to care for these public lands managed by the Forest Service for the benefit of the people. This is the mission of the Forest Service as defined in the Organic Act and one of the main reasons these lands were put in reserve, "to ensure a continuous supply of timber".

The DEIS also failed to include recommendations on grazing from the CGWG. The DEIS failed to include language that livestock grazing was beneficial in reducing grass fuel loading. Livestock grazing is beneficial to soil productivity. Livestock grazing is beneficial to water infiltration. Livestock grazing is beneficial for big game forage. All of these benefits should be pointed out in the DEIS. As stated before in Montana the influx of people from out of state and other more urban states are not familiar or educated on the benefits of livestock grazing.

The DEIS does mention the economic benefit to local livestock operations and local communities but should expand on public education on more of the benefits as listed above.

Much of the DEIS is filled with wildlife analysis from wildlife biologists which have studied biology in school and then hired by the Forest Service and other government agencies. These biologists often do studies for agencies regarding wildlife behavior. Based on past studies the agencies make decisions that affect access for recreation. New studies can arrive at different results depending on the parameters employed during the study. Most often CBU has found the agency ignores the input of residents and especially those involved in generations of farming and ranching. These farmers and ranchers have extensive knowledge in animal behavior and wildlife

but biologists tend to ignore or reject this knowledge. CBU has witnessed biologists making decisions just opposite of a rancher's suggestion. The biologist's feel a sense of their education being threatened when in fact the sharing of a rancher's knowledge should be embraced.

Sometimes studies prepared by a biologist can have a predetermined outcome based on the basis of the study. For example, a study with a title of "What are the adverse effects of motorized recreation, or grazing, or timber harvesting, on elk." the study then compiles information only related to any possible adverse effects. If the title of a study were to be "What benefit does motorized recreation, or grazing, or timber harvests have on elk?" then the results of this study would relate to the benefits. CBU believes these predetermined outcome studies are bias in nature and don't reveal the total picture. These flawed studies are then used in planning actions and decisions that result in a flawed decision.

Currently the elk population has been devastated in much of the Custer Gallatin. Not by grazing, mining, or motorized recreation but by the introduction of wolves. The Northern Yellowstone elk herd once numbering in the 10s of thousands is now about 2000. In the upper Gallatin this herd is a couple hundred. Most of the elk in close proximity to Yellowstone Park are infected with brucellosis at a rate of nearly 50%. Chronic wasting disease has been confirmed in several deer and just recently a confirmed case has been found west of the continental divide. These confirmed cases of disease are being expanded by environmental efforts and land management agencies by creating and supporting wildlife corridors. Corridors of disease will devastate our wildlife populations going forward and the effects on Montana's hunting heritage could be destroyed.

Ranch operations know the importance of controlling disease. Generations of ranch owners know that managing for disease is better done by not comingling of livestock protects the herd from disease. Wildlife is not easily managed for disease. Vaccination is not a viable option to control disease. Options are limited but when land management agencies continue to support management actions that add to the problem, one should question the true direction of the agency. Is it to increase disease? Is it to elevate risk? Is it to experiment with disease transmission in wildlife on the landscape? If the risk of disease transmission is elevated by wildlife corridors and testing is limited and vaccination is not an option, then management agencies should reduce risk and disease transmission by taking actions that are possible. CBU is not seeing the Forest Service addressing this issue and request the agency analyze this problem and provide possible solutions in the FEIS.

The biggest threat to our elk and deer populations is not disturbance from motorized and mechanized recreation. The biggest threat is disease and the devastating affect of increased numbers of large predators. The biggest threat to large predators is not motorized and mechanized recreation. The biggest threat is a saturation of habitat and the expansion of range these predators are moving to resulting in conflict. As with ranching the carrying capacity of land dictates the number of livestock that can be supported. The federal land managers both state and federal ignore range capacity. CBU requests the Forest Service complete an analysis on both ungulate and predator capacity in the Custer Gallatin and include this report in the FEIS. Wildlife disturbance is something the land managers use when deciding appropriate uses on the forest. When studies show increased disturbance by hikers and especially hikers with dogs, they



tend to ignore these facts. Decisions to restrict hiking or dogs in and on our public land would cause a fire storm of public opposition. Rather than make a decision based on science, the Forest Service decides issues based on emotion and public opinion.

For example, studies show less disturbance to wildlife from motorized or mechanized compared to hikers. Especially hikers with dogs as dogs are viewed by wildlife as a threat. Wildlife acclimated to motorized and mechanized wheeled traffic pay little attention as these uses are not perceived as a threat. Wildlife flight distances from hikers and cross-country skiers are much greater than from motorized such as snowmobiles as shown in the study in Yellowstone Park where heart monitors were attached to elk.

Heart monitors were put on elk **in Yellowstone Park and the heart rate and flight distances were recorded as snowmobiles and cross-country skiers went by.** (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.) **Elk were disturbed twice as much from non-motorized passer bys as from motorized.** This discovery can be transferred to ATV and motorcycle use in the summer in relation to hikers and not to mention the impact on wildlife from dogs. Motorized users rarely take pets with them and as in Bozeman we are seeing a huge impact from dogs on our public land. The Forest Service must take this information in to account when deciding the allowed uses of our federally managed public land. These are science based and justified rather than assumptions based on emotion and public opinion.

CBU limits our comments to facts and science, not emotion. Your agency will receive many comments on this proposed action from pro wilderness and anti-motorized and anti-mechanized users. Their comments will be centered around their feelings of being disturbed and upset with motorized and mechanized users. These are emotions which are not based on science or fact.

CBU attended 2 meetings held by the Montana Fish Wildlife and Parks. Two separate biologists made the same statement at the 2 meetings. "We must make decisions not based on science but rather on what is socially acceptable." It is time to shift our focus from making decisions on what is socially acceptable to decisions based on science." This science must also be the "Best Available Science", not agenda driven science. When the Forest Service releases the FEIS, please include the reasoning behind the studies cited in the document. Were these studies performed to conclude a specific impact? Were these studies performed with an actual predetermined and desired outcome?

One recent study conducted in Idaho on Lynx and the effects of winter outdoor recreation on Lynx was a collaborative project between the Idaho State Snowmobile Association and the Winter Wildlands. The focus of the study when it began was to show adverse impacts to Lynx by snowmobiles. During this study the group distributed GPS tracking devices to snowmobilers and back country skiers. CBU attended the meeting in Boise where the results were presented to the groups.

The maps produced showed the actual routes taken by snowmobiles and backcountry skiers during the winter of 2017 and 2018. It was very clear by the tracking that backcountry skiers

were venturing into Lynx habitat at a far greater frequency and far larger area. Snowmobiles are limited by timber and terrain as to where their historic use area has been but backcountry skiers are not limited. In fact, the entire East side of the Tetons was covered with GPS tracks from backcountry skiers. This is a known area occupied by Lynx. This was surprising information to Winter Wildlands which have litigated to remove winter snowmobile use in areas such as Mount Jefferson. Winter Wildlands was disappointed to see the results of this study but CBU has known the limits on snowmobile use and understand snowmobiles have continued to only ride those areas of historic use. Based on our surveys and limits to areas accessible because of terrain or timber, snowmobiles have always had a range of historic use while backcountry skiers continue to expand into areas once void of winter use.

Nothing in the Custer Gallatin Forest Plan restricts non-motorized use that may expand into these areas of Lynx because of advanced technologies in the backcountry skier equipment. The Custer Gallatin seems more focused on a predetermined agenda of anti-winter motorized as reflected by the previous Travel Plan and the Interim Order being renewed every year by Mary Erickson on closing the HPBH WSA to historic snowmobile use. Maybe it is time to consider the increased use of the HPBH WSA by backcountry skiers and consider limiting or removing their use in the WSA. As reflected by the results in the Idaho study there is clear evidence of greater disturbance of Lynx by backcountry skiers than from snowmobiles.

Backcountry skiers must trek up the mountain in order to ski. The backcountry skier has greater impact because of additional presence within the area of Lynx. Why has the Forest Service ignored this information? Why has the Forest Service focused solely on adverse effects of winter motorized use? Is this a decision of the Custer Gallatin and ID Team Leader Virginia Kelly or is this driven by Region 1 Supervisor Leanne Martin? Other regions of the Forest Service embrace motorized and mechanized use while region 1 seems to continue their removal of both motorized and mechanized use on our public lands they manage.

CBU requests the Forest Service restore historic motorized winter use and summer motorized and mechanized uses of the HPBH WSA in their final FEIS. CBU opposes any further closures of motorized and mechanized use of the Custer Gallatin National Forest. CBU supports increased active forest management and increased timber sales. CBU opposes fire as a preferred management tool in the Custer Gallatin National Forest. CBU supports the responsible development of any locatable mineral deposits in the Custer Gallatin National Forest.

Thank you for your consideration of these comments and the supplemental requests and information contained in the following document. CBU looks forward to continuing our efforts working with the Forest Service in maintaining our important recreation facilities and infrastructure today and into the future. We only hope the Forest Service will consider motorized and mechanized use as a legitimate form of recreation activity in the Custer Gallatin National Forest.

Sincerely,  
Kerry White  
Executive Director  
Citizens for Balanced Use

A handwritten signature in dark ink, appearing to read 'Kerry White', with a stylized, flowing script.