



September 7, 2020

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Submitted via Email to: <https://cara.ecosystem-management.org/Public/CommentInput?project=50185>

Re: Objections to the Custer Gallatin National Forest 2020 Land Management, Draft Record of Decision, and Final Environmental Impact Statement

Responsible Official: Mary Erickson, Supervisor, Custer Gallatin National Forest

The Sierra Club submits the following objections in regard to the Custer Gallatin National Forest 2020 Land Management Plan (2020 Forest Plan), Draft Record of Decision (DROD) and Final Environmental Impact Statement (FEIS) on behalf of more than 2,600 active members in Montana and 3.7 million members and supporters nationwide.

This forest plan revision comes at an unprecedented time in the history of our region, the nation, and globally. We are facing a climate crisis and we are in the midst of the sixth great extinction, with one million species at risk of being gone forever. We are experiencing a global pandemic, largely caused by habitat destruction and exploitation of wildlife. Growth in the Greater Yellowstone region continues to grow at a more rapid pace than the rest of the country, with no signs of slowing. The 2020 Forest Plan will be in place for at least the next two decades, and it is imperative that it be forward-thinking in attempting to address these crises and to position us in the best place possible for a challenging future. Now is not the time to put the health and well-being of our public lands, waters and wildlife in second place. Many scientists, Indigenous leaders, conservation groups and others have embraced the “Nature Needs Half” concept and are working to enact policies and practices to conserve 50% of the Earth’s remaining natural systems by 2050. The Custer Gallatin National Forest (CGNF) can and should play a significant role in helping to meet that goal by enacting the strongest protections possible for the wildlands, waters and wildlife of the Forest.

Formed in 1892, the Sierra Club is the nation’s oldest and largest environmental advocacy organization. Our mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment and to use all lawful means to carry out these objectives. We have a long history of working to protect wildlands and wildlife in Montana generally, and in specifically protecting and connecting public lands between the Northern Continental Divide Ecosystem (NCDE) and the Greater Yellowstone Ecosystem (GYE) for grizzly bears and other wide-ranging species. Our members spend substantial time on the CGNF to experience solitude and inspiration, and to pursue a wide variety of educational and recreational pursuits. Our members and supporters also understand that management of our

national forests transcends personal interests, and recognize the critically-important role that the CGNF plays in maintaining the health of the entire GYE as well as the well-being of rare and imperiled species including grizzly bears, Canada lynx, and wolverines, among others. Keeping the CGNF's remaining wildlands and rivers intact is essential in achieving connectivity with the NCDE for wide-ranging animals such as grizzly bears and many other species, and for providing refugia for wildlife in a warming climate.

We recognize and appreciate the significant amount of work that the Forest Service has undertaken in drafting the new 2020 Forest Plan, FEIS and associated assessments and other documents over the past several years as well as the efforts to involve the public in this important plan revision. We appreciate the more detailed analysis and plan components regarding connectivity in the 2020 Forest Plan and FEIS. We do, however, have significant outstanding concerns, particularly in regard to potential adverse impacts on wildlife and achievement of connectivity between the CGNF and other national forests and public lands for grizzly bears and other species. We hope these concerns will be addressed in the objection process.

Standing to File Objection

The Sierra Club has submitted timely, detailed comments at every stage of the forest plan revision process, including on the Proposed Action (PA) and Draft Plan/Draft Environmental Impact Statement (Draft Plan/DEIS) for the CGNF. The issues raised in our objections herein are based on these previously submitted comments because we believe that the Forest Service has not adequately addressed the concerns we raised in previous stages of the forest plan revision process.

Request for Resolution Meeting

Pursuant to 36 C.F.R. Section 218.11(a), the objector requests to meet with the reviewing officer to discuss and resolve these objections.

Objection 1. Exclusion of Key Roadless Areas from Wilderness Recommendations.

The Sierra Club objects to the Forest Service's exclusion of key roadless areas, including areas previously recommended, from its recommendations for wilderness designation in the 2020 Forest Plan.

Madison, Henry's Lake and Gallatin Mountains Geographic Area

Porcupine Buffalo Horn

The Porcupine Buffalo Horn area provides some of the best wildlife habitat in the entire GYE. Recreational use of this area has proliferated over the past decade; however, no monitoring that we know of has taken place to determine the impacts of increasing motorized and non-motorized recreation on wildlife including potential displacement impacts.

As noted in our comments on the Draft Plan:

“[T]he Porcupine Buffalo Horn area provides some of the most important wildlife habitat in the WSA. It is a critical component of the Primary Conservation Area for grizzly bears. Elk from Yellowstone National Park migrate into the Buffalo Horn drainage in winter as it generally has less snow and a milder climate. The Buffalo Horn drainage in particular is very important for regional connectivity for elk. ¹ As such, it absolutely deserves long-term protection. In designating this area

¹ The Craighead Institute “Wilderness, Wildlife and Ecological Values of the Hyalite-Porcupine-Bufferalo Horn Wilderness Study Area” November 2015. p. 71, 77

“backcountry” and open to continued motorized and mechanized use in some alternatives of the DRFP, the Forest Service proposes to allow fully *two-thirds* of the width of the WSA in the Porcupine Buffalo Horn to be severely compromised. The Forest Service should recommend the entire area from east of the Big Sky Snowmobile Trail to the eastern edge of the WSA for wilderness designation, prohibiting mechanized and motorized use of the current Porcupine and Buffalo Horn trail to Ramshorn Lake (trail #160). We recognize the popularity of this trail to mountain and motorized users. However, this habitat and linkage zone are too important to wildlife not to be permanently protected as wilderness. Additionally, the human population of the Big Sky area will only continue to grow in the coming years, and associated demands for more and more recreational access will threaten this landscape, with the potential to displace wildlife to an even greater degree.

Recommended wilderness east of the Big Sky Snowmobile Trail on the northern portion of the trail should follow the original WSA boundary (prohibiting the current snowmobile “play area”).”

In the 2020 Forest Plan allocations, establishing a Backcountry Area (BCA) for the Porcupine Buffalo Horn leaves out the vast majority of this roadless area from the strongest level of protection (recommended wilderness) and allows new mechanized trails. As noted in our previous comments on the Draft Plan, encounters between mountain bikers and grizzly bears are on the rise as both bear and human populations expand; such growth is particularly true of the Big Sky area, and just this year there was a serious encounter between a mountain biker and a grizzly bear there. It is well documented that motorized roads and trails cause avoidance by grizzly bears, and allowing continued motorized use and in fact increased mountain bike use under the 2020 Forest Plan is misguided. The Hidden Lakes roadless area was also excluded with no rationale provided; this spectacular area of high alpine lakes and meadows should be recommended for wilderness designation.

We also object to the determination in the 2020 Forest Plan that timber harvest is suitable in BCAs, including Porcupine Buffalo Horn.

Hyalite/West Pine

We object to the boundaries of the Hyalite Recreation Emphasis Area (REA). As we proposed in our comments on the Draft Plan, the northwest section of the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA), including the upper portion of the South Cottonwood drainage, should be protected through recommended wilderness. The 2020 Forest Plan allocation leaves this important wild corridor with no protections. As we noted in previous comments:

“[W]e believe the upper part of the South Cottonwood Creek drainage should be recommended for wilderness. It is wild and incredibly scenic, which is most likely why it was included in the HPBH WSA decades ago. It should be recommended for wilderness. In this area, the RW boundary should extend from immediately south of the History Rock trail to Hyalite Peak, and from the current WSA boundary on the west to Hyalite Creek. This recommendation thus allows continued mountain bike use of the History Rock trail but not the Blackmore trail, which would be included in RW. Hyalite Peak and the surrounding alpine basins should be included in RW. The Hyalite Creek and Emerald Lake trails would be included in the “Hyalite Watershed Protection and Recreation Area” proposed by the Partnership.”

West Pine BCA allows new mechanized trails, and indeed the 2020 Forest Plan objectives are to “create at least one opportunity to enhance non-motorized trail connectivity by connecting existing trails to create loop rides or to connect to other parts of the trail network.” (2020 Forest Plan at 178)

Considering that under the 2020 Forest Plan West Pine is a BCA and allows new mountain biking trails and timber harvest; that the Hyalite REA extends south to Hyalite Peak, does not include any protections for

South Cottonwood, allows new motorized and mountain bike trails and increased capacity and new campgrounds, as well as timber harvest; it is difficult to conceive of how wildlife will be able to migrate through the Hyalite/West Pine area in order to reach the Gallatin Key Linkage Area to the north.

Lionhead

The Lionhead was previously recommended for wilderness in the prior forest plan. The sole reason provided in the DROD for excluding this important area from recommendation in the revised plan is 18 miles of existing mountain bike use. The Sierra Club believes that mountain bike use is and has always been inconsistent with recommended wilderness and is not a sufficient reason to exclude it from being recommended in the 2020 Forest Plan. Additionally, its allocation as a BCA under the 2020 Forest Plan does not preclude new recreation events, or – at least as far as we can discern from the forest plan components – creation of new mountain bike trails that become part of the “approved system mountain biking routes.” New trails and recreation events will impair the wilderness character of the Lionhead.

Cowboy Heaven

As noted in our comments on the Draft Plan, this 17,000-acre roadless area provides an important linkage between the Beartrap Canyon and Spanish Peaks units of the Lee Metcalf Wilderness. As noted in the Wilderness Evaluation (WE), “[A]part from hunting season, recreational use is light and the area retains a remote feel with opportunities for solitude.” (WE at 339) Nearly the entire area is secure grizzly bear habitat; over 13,000 acres is critical lynx habitat and over 12,000 acres provide secure habitat for elk. Additionally, 1,400 acres are considered potential bison habitat. (WE at 341)

Given light recreational use of this area, the fact that it is secure grizzly habitat, and that this area has unique ecological values in that it is lower-elevation and more arid than many areas usually recommended for wilderness, the Forest Service should recommend Cowboy Heaven for wilderness designation. Allowing new recreational events and new mountain bike trails in this area could result in conflicts between grizzly bears and mountain bikers. The only rationale provided for not recommending Cowboy Heaven for wilderness designation is to allow more flexibility in managing for administrative use and “fuel and restoration work in the area.” However, no additional detail is provided on such fuel and restoration work or what type of management the Forest Service foresees for this area. Without such justification, it is difficult to understand why the Forest Service is excluding this worthy area from its wilderness designation recommendations. The Draft ROD notes some ‘hesitancy’ from the Gallatin County Commission as reason not to recommend Cowboy Heaven for wilderness designation, but also noted separately that the Gallatin and Madison County Commissions support the Gallatin Forest Partnership proposal which includes recommended wilderness for Cowboy Heaven and that the Forest Supervisor was most influenced by the diverse and local commissioner support for the GFP proposal. To then cite ‘hesitancy’ from the Gallatin Commissioners as a reason not to recommend it for wilderness designation seems disingenuous.

Absaroka Beartooth Mountains Geographic Area

We object to the decision to drop the three previously-recommended areas from the 2020 Forest Plan’s wilderness recommendations. In its rationale, the Forest Service stated that there is “no value to a recommended wilderness allocation because in the long term, there would be no real value with a boundary adjustment to the Absaroka-Beartooth Wilderness or North Absaroka Wilderness, and no new protection afforded by doing so.” (DROD at 14) However, recommended wilderness does provide a higher level of protection than if there was no protection – as under the 2020 Forest Plan. Just because there is currently no perceived threat of development to this wild landscape does not mean that such threats will not arise in the future.

As noted in our comments on the Draft Plan on the Line Creek roadless area,

“[W]hile half of this 33,000 acre IRA is protected as a Research Natural Area, the remainder of this IRA does not have any protection. The core of this area remains wild and should be recommended. More than 26,000 acres provide secure habitat for grizzly bears and elk, and over 7,000 acres are designated as critical lynx habitat. Yellowstone cutthroat trout are present. There are no significant challenges for managing this area as wilderness, particularly in the core of the IRA. As noted in the WE,

“Challenges to manageability for wilderness character largely occur around the perimeter. Lack of infrastructure within the interior would make the area generally manageable as wilderness, because of its relative large size, lack of private inholdings and roads within the boundary, lack of grazing infrastructure, water developments or other permitted uses.” (WE at 61)

The Forest Service acknowledges the worth of the Line Creek IRA and that it could be managed as wilderness, and should recommend it for designation.”

We object to the exclusion of the West Fork/Lake Fork of Rock Creek, Mill Creek and East Rosebud roadless areas from wilderness recommendation, due to the qualities outlined in our previous comments on the Draft Plan:

“[T]he alpine landscape of the eastern Silver Run plateau bordering the existing A-B Wilderness is highly deserving of permanent protection. Steeply timbered slopes connect to higher elevations and sub-alpine tundra plateaus and “much of the area provides for high levels of solitude because of the limited number of trails and its overall steep and remote location.” (WE at 76) The area also contains 16,000 acres designated as municipal watershed – another strong justification for protection. The area provides over 27,000 acres of secure grizzly bear habitat as well as 25,000 acres of elk security habitat and 17,000 acres of designated critical lynx habitat. Two small areas were previously recommended for wilderness in the 1986 Custer forest plan; the recommendation should extend to the entire IRA. We recognize that there are approximately 20 miles of mountain bike trails in this polygon. However, the fragile, high-elevation environment of the plateau is clearly inappropriate for mechanized or high-density uses, and it is essential that this landscape be fully protected, even in its periphery.”

“[P]olygon AB_15’s 56,000 acres stretching south from Mill Creek along the A-B Wilderness boundary to Cedar Creek provide more than 40,000 acres of secure grizzly bear habitat and nearly 20,000 acres of critical lynx habitat. These lands are important migration corridors and winter range for ungulates. At least the portion south of Mill Creek road and adjacent to the A-B Wilderness boundary should be recommended for wilderness designation.”

“[T]his 25,000-acre area extending from the East Rosebud drainage north to the Stillwater Road should be recommended for wilderness. It is adjacent to the existing A-B Wilderness area and connects to sub-alpine tundra and higher elevations, and “much of the area provides for high levels of solitude and primitive recreation because of the lack of trails and its overall steepness and challenge.” The majority of the polygon is secure habitat for grizzly bears and elk, and there are nearly 9,000 acres of critical lynx habitat. (WE at 88, 91)

Bridgers, Bangtail and Crazies Geographic Area

The Sierra Club recognizes the management challenges of recommending wilderness in checkerboard landscapes such as the Crazies and we appreciate the decision to recommend wilderness designation in the southern part of the range. However, the boundaries of the recommended wilderness polygon relate only to land ownership status as of today, and not to ecological significance or wilderness characteristics. We object

to the boundaries in the 2020 Forest Plan primarily because land ownership conditions are likely to change substantially because of the proposed land exchange in that immediate area. Within a few months of the final plan's adoption, those recommended wilderness boundaries are likely to have no real-world relevance. The Forest Service needs to put a plan in place for the Crazies that recognizes this fact, and that allows for the enlargement of the area recommended for wilderness designation as land ownership consolidates over time.

We also object to designation of other roadless areas in the central and northern Crazies as a BCA that allows timber harvest and mountain bike use. Currently, there are no mountain bike trails in a significant portion of the roadless areas in the central and northern Crazies. Given the Crazies' noted importance for connectivity, timber harvest and mountain bike trails should be prohibited.

In the Bridgers, as proposed in our comments on the Draft Plan, we believe the roadless polygon around Blacktail Peak should be recommended wilderness, not a BCA that allows timber harvest. Additionally, the 2020 Forest Plan is silent on allowing winter motorized or other recreation events in the Blacktail Peak BCA; plan components should clearly prohibit recreation events given the importance of this area for wildlife connectivity. The Bridger Key Linkage area also allows timber harvest. Though there are guidelines to limit disturbance effects on wildlife movement patterns in Key Linkage Areas, we oppose timber harvest in this critical linkage between the GYE and NCDE ecosystems, particularly without additional rationale from the Forest Service regarding any perceived need for timber harvest.

Pryor Mountains Geographic Area

We object to the 2020 Forest Plan's exclusion of the Big Pryor and Punch Bowl roadless areas in its wilderness recommendations, instead designating them as Backcountry Areas. As noted by the Pryors Coalition in its objection, which the Sierra Club has signed on to, Forest Service assumptions and conclusions in regard to these areas and the rationale for not recommending them for wilderness are in error and should be re-evaluated.

Connection to Prior Comments

As noted in several places above, the Sierra Club commented on, advocated for, and provided extensive rationale for all of the above areas to be recommended for wilderness in our comments on the Draft Plan.

Remedy

The Forest Service should recommend the following roadless areas for wilderness designation with boundaries as outlined in our comments on the Draft Plan and attached maps:

- Porcupine Buffalo Horn (including the Hidden Lakes area), West Pine, Cowboy Heaven, Lionhead (Madison, Henry's Lake, and Gallatin GA)
- Line Creek, West Fork/Lake Fork of Rock Creek, Mill Creek, East Rosebud (Absaroka Beartooth Mountains GA)
- Blacktail/Horsethief Mountain, Crazy Mountains (3 distinct roadless areas) (Bridger, Bangtail and Crazy Mountains GA)
- Big Pryor and Punch Bowl (Pryor Mountains)

South Cottonwood should be recommended for wilderness (RW) as outlined in our previous comments:

In this area, the RW boundary should extend from immediately south of the History Rock trail to Hyalite Peak, and from the current WSA boundary on the west to Hyalite Creek. This recommendation thus allows continued mountain bike use of the History Rock trail but not the

Blackmore trail, which would be included in RW. Hyalite Peak and the surrounding alpine basins should be included in RW.

The Hyalite Recreation Emphasis Area southern boundary should be adjusted to stop at Hyalite Lake as in Alternative C of the FEIS, rather than going all the way to Hyalite Peak, in order to preserve the wilderness character of the upper basin.

If these roadless areas ultimately are not recommended, at a minimum, in addition to existing plan components restricting various activities in BCAs such as permanent or temporary road building, all BCAs and Key Linkage Areas should prohibit recreation events (daytime and evening), timber harvest, and development of any new roads or trails (motorized or mechanized) in order to protect their wild character and wildlife.

Objection 2. The 2020 Plan Fails to Include Plan Components to Ensure Impacts of Recreation Emphasis Areas Are Sustainable and Do Not Harm Wildlife and other Forest Resources.

The 2020 Forest Plan has as its #1 Desired Condition for many if not all Recreation Emphasis Areas (REA) to “provide[s] sustainable recreation opportunities and settings” that respond to increased public demand for more recreation access and infrastructure. However, none of the plan components for REAs include standards or guidelines that will ensure increased recreation is in fact “sustainable” and will not adversely affect wildlife, river corridors, or other resources of the CGNF. Notably, the Forest Service expects to expand recreational access in the Bridgers and Hyalite (as well as other areas deemed REAs), but it is unclear how the agency will determine what is “sustainable.” What is the baseline? Indeed, what kind of baseline information on wildlife disturbance and avoidance has the Forest Service collected to date, in which to measure against for potential adverse impacts on wildlife and other Forest resources in the future when new campgrounds and other infrastructure are developed in these areas?

Additionally, the Forest Service notes in the 2020 Forest Plan the importance of riparian areas to (fish and) wildlife for many parts of species’ life cycle: “[r]iparian habitats are disproportionately critical in providing habitat and habitat connectivity for fish, other aquatic biota, and wildlife.” (2020 Forest Plan at 25) However, REAs for river corridors such as the Gallatin, Yellowstone and others contain no plan components that will enforce the Desired Condition of “sustainable” recreation opportunities.

Connection to Prior Comments

In our comments on the Draft Plan, the Sierra Club raised substantial concerns about the impact of human population growth and associated demand for increased recreational access on wildlife in the CGNF:

“[H]uman population in the plan area, specifically the Bozeman/Belgrade/Big Sky area, is rapidly increasing and this trend is expected to continue in the coming years. It has become common to see headlines such as “Big Sky Crowded: Growth, density and the future of the Gallatin;” “Bozeman is the fastest growing community in the U.S.,” “Bozeman must plan for thousands of new residents,” etc. in local papers.

This is a core issue that must be considered in the context of the CGNF plan revision.

A March 2017 article discussing growth in Gallatin County noted that:

“[A]s in recent years, Gallatin County has been, far and away, the fastest growing county in Montana...With new arrivals flocking to the Bozeman area, Gallatin County continued its blistering population growth between 2015 and 2016, according to freshly released numbers from the U.S.

Census Bureau...The county's overall population growth rate between 2015 and 2016, 3.7 percent, was also up slightly from the previous year's 3.5 percent rate. It's also substantially higher than the county's average annual growth rate between 2000 and 2010: 2.8 percent.”²

A new report³ released in January 2018 by Denver-based Economics and Planning Systems, Inc. (EPS) notes that “[E]ven if Gallatin’s growth rate were to level out, the county could receive another 55,000 people by 2045.” Half of those arrivals are expected to land in Bozeman.

Bozeman is now growing at well over the national rate. The EPS report notes:

“[B]ozeman is one of the fastest growing places in the nation. Between 2000 and 2016, the City added approximately 17,000 new residents, which translates to a growth rate of nearly 1,100 new residents per year or an annual growth rate of 3.0 percent...[G]rowth rates since 2014 have averaged approximately 4.7% or roughly 1,800 new residents per year.”⁴

Such numbers have inspired comparisons to much bigger cities and predictions that it is only a matter of time before this becomes a reality in Gallatin County. We need to take concrete action now to protect what makes Greater Yellowstone so unique. A 2017 article in *Mountain Journal*⁵ opined that:

“[A] three percent annual growth rate means Bozeman/Gallatin will double in 24 years. A four-percent rate, meanwhile, means it would only take 18 years to reach Salt Lake City and 36 years (or the year 2053) to match the population of present-day Minneapolis proper.”

Tens of thousands of new residents living in Gallatin County in the coming years will result in significant additional development of private lands, and associated infrastructure to support new housing development, which will further squeeze wildlife onto less land with less options for achieving connectivity. We cannot expect connectivity to be maintained at its current level and certainly cannot expect it to improve with the anticipated growth of Gallatin Valley, without strong protections for the lands within the national forest.

As noted in the DEIS, the 2012 Planning Rule acknowledges that the plan area exists within the broader landscape, and the Forest Service must take into account existing conditions outside the national forest boundaries that may influence the plan area’s ability to maintain or restore ecological integrity. (DEIS at 479)”

Remedy

The Forest Service should add specific plan components to establish baseline data on current impacts to wildlife from all types of recreation, and plan components to regularly monitor and evaluate recreational use and impacts, in order to determine a “sustainable” level of recreational use. Plan components should be added to prohibit recreational uses where they are negatively impacting/displacing wildlife.

Objection 3. The 2020 Forest Plan Fails to Consider Potential Impacts on Wildlife From Emerging Recreational Technologies.

² https://www.bozemandailychronicle.com/news/county/gallatin-county-grows-another-nudges-further-past-residents/article_611e4358-57e7-5297-a7e9-32080bd2cea5.html

³ <http://weblink.bozeman.net/WebLink8/0/doc/145438/Electronic.aspx>

⁴ Ibid p.12

As noted in our comments on the Draft Plan, we are very concerned that the Forest Service continues to fail to include plan components to analyze or even acknowledge the potential impacts of emerging recreational technologies on wildlife. The 2020 Forest Plan does not provide any additional plan components in this regard. The only goals are to enhance visitor use and experiences. However, this is a misguided approach, as outlined in our previous comments:

“[I]ncreased population growth will inevitably result in new, increased stress on wildlife and public lands, and new challenges for land managers, simply due to more people living and recreating in the area. Public demand for recreational access and public use of the landscape can be expected to accelerate, and we can also anticipate additional types of recreational demand and new technologies that can go further and faster. For example, no one was thinking about fat bikes or electric bikes and how to manage them on the landscape a decade ago. Today, however, this is something that must be considered by land managers.

The Sierra Club is very concerned that the DRFP does not potential resource impacts from “Emerging Recreational Technologies” and how those impacts might be addressed, or that there may be a need to consider not allowing new recreational technologies on the Forest or to limiting their use. Language in the DRFP seems to allow any new type of recreation without any caveats to possible environmental impacts. For example, the only Desired Condition is “New recreational technologies contribute to visitor enjoyment and experiences, consistent with recreation settings.” (FW-DC-RECTECH 01, DRFP p.109). The only Goal is “New recreational technologies are integrated into the Custer Gallatin with support and guidance through the involvement of a community of interests.” (FW-GO-RECTECH, DRFP p.109). The Sierra Club made this same comment in regard to the Proposed Action, and we are disappointed to see that the Forest Service did not do anything to incorporate the need to consider environmental impacts in the DRFP’s plan components on Emerging Recreational Technologies. We believe this is a serious omission and hope and expect that it will be addressed in the final plan for the CGNF.”

New technologies such as electric bikes and motorcycle-style snowmachines are allowing people to go farther and faster than ever into the backcountry⁶, and little if any monitoring and evaluation is being done to understand the impacts of these new technologies on wildlife.

Remedy

The Forest Service should ban the use of emerging recreational technologies until such time as it can thoroughly assess the potential impacts of new technologies on wildlife, Forest users, and resources of the Forest. Plan components should be added to ensure that emerging recreational technologies will not be allowed until it can be shown that they will not negatively impact wildlife and other resources of the Forest. If the Forest Service believes that adequate components exist in the 2020 Forest Plan in this regard, it should clearly identify those components and explain how the Forest Service will evaluate and restrict damaging new recreational technologies that adversely affect wildlife.

Objection 4. Inadequate Protections in Key Linkage Areas to Achieve Wildlife Connectivity.

The Sierra Club appreciates the detailed section on connectivity in the FEIS. This is one of the most extensive considerations of the issue that we have seen in forest plan revision processes in the region. We also appreciate the additional plan components for Key Linkage Areas. The 2020 Forest Plan would benefit from a specific section on Key Linkage Areas and relevant plan components, as was done for BCAs and other designated areas.

⁶ https://billingsgazette.com/lifestyles/recreation/snowbikes-add-new-spark-to-winter-motorsports/article_b2072469-b383-5b33-9294-fdaec8b1c934.html

However, plan components for key linkage areas remain insufficient. Despite laudable desired conditions and guidelines, there are no across-the-board standards for Key Linkage Areas except for FW-STD-WL-02 regarding nighttime recreation events. FW-GDL-WL-03 states that “[T]o maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed in key linkage areas.” (2020 Forest Plan at 54) However, this is only a guideline and “should” does not guarantee that new recreation development shall not occur. If recreation development is prohibited in Key Linkage Areas, the components should clearly say so through a specific standard. Additionally, other guidelines such as FW-GDL-WL-01 through 04 in regard to restricting management actions, vegetation management and facilities should be standards. Given that the main purpose of Key Linkage Areas is to foster wildlife connectivity, new trails (of any kind) or other recreation development should not be allowed.

We object to the lack of a prohibition on daytime (in addition to night time) recreation events in the 2020 Forest Plan, and allowance of timber harvest. The FEIS notes that under Alternative F, 11,000 acres of timber ground are deemed suitable in key linkage areas (FEIS Volume 2 at 146).

Remedy

Given the critical need to achieve connectivity between the GYE and NCDE across I-90 for grizzly bears and other wide-ranging species, the utmost protection should be given to the Bridger and Gallatin Key Linkage Areas. Additional plan components prohibiting any recreation events, new motorized or non-motorized trails, and timber harvest should be added to the 2020 Forest Plan for Key Linkage Areas.

Objection 5. The 2020 Forest Plan Does Not Adequately Consider the Disproportionate Impact of Mountain Bikers on Grizzly Bears.

The Sierra Club is very concerned that the 2020 Forest Plan allows creation of new mountain bike trails in areas important to grizzly bears currently, and that will be important to them in the future as the population expands, in the Madison, Henry’s Lake and Gallatin GA, and the Bridger, Bangtail and Crazy Mountains GA. Indeed, the Forest Service is planning to create new trails and/or loop trails in important areas such as the West Pine BCA, which is directly adjacent to the Gallatin Key Linkage Area and an area critical for north-south connectivity for bears. We are also very concerned about new mountain bike trails where there has been no established use such as in the Crazies, another important area for grizzly bear connectivity. As noted in our comments on the Draft Plan:

7 “[A]s land managers are well aware, as grizzly bear populations have made a comeback in Montana, there have been more conflicts between grizzly bears and recreationists, some unfortunately resulting in injury or death of the mountain biker, grizzly bear, or both. In a literature review of the effects of recreation on wildlife, the Craighead Institute notes that “[E]ffects on wildlife are generally more pronounced with mountain bikes than with either hiking or horseback, generally due to the ‘sudden encounter’ effect (Quinn and Chernoff 2010).”

The Craighead Institute’s literature review also noted that mountain bikers and motorized users can travel much greater distances in a shorter amount of time, thus impacting a larger area, and that wildlife usually reacted more strongly to these users:

“[I]n one well-designed study, Wisdom et al. (2004) observed increases in elk flight response and movement rates related to human recreational use in the same 3,590 acre section of the Starkey Experimental Forest and Range in Oregon. Elk flight response was greatest for ORV use, followed by mountain biking, and finally human hikers and horseback riders. "Higher probabilities of flight

⁷ Ibid p. 33

response occurred during ATV and mountain bike activity, in contrast to lower probabilities observed during hiking and horseback riding. Probability of a flight response declined most rapidly during hiking, with little effect when hikers were beyond 500 meters from an elk. ...Higher probabilities of elk flight continued beyond 750 meters from horseback riders, and 1,500 meters from mountain bike and ATV riders.” Significantly, an increase in movement rates at sunrise and sunset following daytime ORV and mountain-biking use was observed, suggesting the elk are displaced from preferred security and foraging activities following human use. Only one pair of ATV users were needed to cover the 20-mile study area, but two pairs of mountain bikers and three pairs of hikers were needed to cover the distance in the time allotted, underscoring the different relative distances that the three groups are capable of covering.

...A literature review by Snetsinger and White (2009) found documentation of negative impacts on elk from snowmobiles, skiing, hiking, biking, horseback riding, human presence, trails, and developed recreation sites. Flight responses have been recorded for elk up to 650 m from skiers (Cassirer et al. 1992); 500 m from hikers and horseback riders; and 1500 m from bikers (Wisdom et al. 2004). Elk were observed fleeing further distances from bikers than from hikers or horseback riders (Wisdom et al. 2004, 2005).”⁸

The Forest Service itself has acknowledged the serious potential for conflicts between mountain bikers and bears and recently developed specific public messaging on this issue.⁹ In recent news stories regarding mountain bike use in occupied grizzly habitat, the former USFWS grizzly bear recovery coordinated stated:

“[M]ountain bikers have the potential to compromise and diminish the value of grizzly bear habitat by displacing bears from bike trail areas.

Mountain bikers also put themselves at serious risk of surprise encounters with both black and grizzly bears because they travel quietly at high speed...This is exactly what we tell people not to do when traveling in grizzly habitat.”¹⁰

The board of review in the death of mountain biker Brad Treat in 2016 attributed the increased hazards associated with mountain biking in bear habitat to the tendency for the activity to be comparatively quiet and for bikers to travel at a higher speed than hikers. In addition, the board observed that mountain bikers tend to focus on the trail close to the bike “instead of looking ahead for bears, especially on single-track trails.”¹¹

A February 2016 article at singletracks.com observes, “Mountain biking is perhaps the most dangerous of the forms of recreating in bear country.”¹²

Outdoors retailer REI was even more blunt in one installment of the company’s online “Expert Advice” feature: “It is not advisable to ride mountain bikes in grizzly country. Bikes cover ground quickly and quietly, meaning you could encounter a grizzly in a swift and startling manner. Such a meeting is a grave error in grizzly territory.”¹³

⁸ Ibid p. 75-76

⁹ https://www.dailyinterlake.com/local_news/20190526/experts_warn_bikes_and_bears_a_risky_combination

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

As noted by former recovery coordinator Servheen, “Bears must live in these areas while humans are just visitors.” And the GYE and NCDE are two of only a tiny handful of places where they actually can live in the lower 48.”

Given the disproportionate impact of mountain bikers on grizzly bears, as noted in the FEIS itself (FEIS at 444), we object to only the Blacktail Peak and Bad Canyon BCAs being determined not suitable for mountain bikes.

Remedy

Develop and adopt plan components to prohibit new mountain bike trails in BCAs in the Madison, Henry’s Lake, and Gallatin GA and the Bridger, Bangtail and Crazy Mountains GA. Develop and implement plan components to analyze the current and potential impacts of mountain bike trails in Recreation Emphasis Areas in the Madison, Henry’s Lake, and Gallatin GA and the Bridger, Bangtail and Crazy Mountains GA on grizzly bears and other key species.

Objection 6. The 2020 Forest Plan’s Guideline on Recreation Events to Prevent Conflicts With Grizzly Bears is Inadequate.

While we appreciate the Forest Service’s acknowledgement of impacts of non-motorized recreation events on grizzly bears, FW-GDL-RECEVENT-02 is insufficient. This guideline only applies to evening events and to the primary conservation area. Foot races, mountain bike races, etc. during the daytime outside of the primary conservation area (as well as inside) could negatively impact grizzly bears and endanger human safety.

Connection To Prior Comments

As noted above, the Sierra Club has commented extensively on our concerns about the impacts of recreation on grizzly bears.

Remedy

In order to protect grizzly bears and people from surprise encounters and potential injury, and to prevent displacement of bears, all recreation events should be prohibited in both daytime and evening throughout occupied grizzly bear habitat, and in habitat where bears are likely to expand in the future. At a minimum the prohibition on recreation events should be throughout the Demographic Monitoring Area where the population is monitored and the boundary of which serves as the area used to estimate the population.

Objection 7. The 2020 Forest Plan Does Not Address Key Causes of Grizzly Bear Mortality on the CGNF.

The 2020 Forest Plan primarily relies upon a fixed buffer along roads and around developed areas in the Primary Conservation Area to define the geospatial extent of human threats to grizzly bears. However, one of the key causes of grizzly bear mortality on the CGNF and in the GYE generally is deadly encounters with hunters. The Sierra Club has advocated for years for the Forest Service to be more pro-active in instituting more requirements of the hunting community to prevent conflicts with grizzly bears. Many of these – such as requiring outfitters and their clients, and individual hunters, to carry bear spray, not shoot prey late in the day, etc. – are practical, cost effective and have proven efficacy – and indeed were included as recommendations in the 2009 Conflicts and Mortality Report of the Interagency Grizzly Bear Study Team.

As noted in the attached declaration by Dr. David Mattson, “...[B]etween 1998 and 2019, 50-58% of all grizzly bears killed by humans on the CGNF died because of encounters with hunters... Virtually none of the

close encounters between bears and hunters occur on or near roads. Rather, almost all occur on trails, at backcountry campsites, or in off-trail areas. Moreover, most close encounters between and grizzlies and hunters on foot occur in areas >500 m from mapped roads used to calculate habitat security...The CGNF Plan does not directly address the reasons why grizzly bears die from human causes in any goals or standards. This a major deficiency, first, because human-caused mortality is a severe threat to grizzly bears (U.S. Fish & Wildlife Service 1993) and, second, because physical distance from roadbeds does not, in fact, address the main reason why grizzly bears die on the CGNF.”

Remedy

Develop and adopt plan components and related regulations to address threats posed by hunters to grizzly bears on the CGNF.

Objection 8. The 2020 Forest Plan Prematurely and Inappropriately Adopts Draft Grizzly Bear Developed Site Standards.

In the 2020 Forest Plan, the Forest Service has “...[d]ecided to adopt modified grizzly bear developed site standards between draft and final environmental impact statement” despite the fact that these proposed changes are still “pending consideration” by the Yellowstone Ecosystem Subcommittee (DROD at 18). We object to the premature adoption of these changes. Despite the rationale offered by the Forest Service – that including these changes now will ensure the impacts of the changes to developed site standards are evaluated in the plan revision process – it is premature to adopt those changes when the proposed changes to the Conservation Strategy have not been released for public comment as a substantive change to the Strategy, or finalized by the Yellowstone Ecosystem Subcommittee. It is inappropriate to introduce adoption of draft changes to the Conservation Strategy in a final forest plan; the Forest Service cannot just adopt draft standards and changes to the Conservation Strategy in the 2020 Forest Plan.

As the Forest Service well knows, over 85% of grizzly bear mortalities in the Yellowstone Ecosystem are a result of human-related causes. The main motivation for changing the developed site standard noted in the FEIS is to “allow greater management flexibility to increase the number and/or capacity of developed sites to address recent, unprecedented population growth in the Greater Yellowstone Ecosystem, as well as dramatic increases in visitor use of public lands.” (FEIS at 424) Thus, in changing this standard there is a potentially large impact on grizzly bears that must be thoroughly evaluated before being adopted by any land management agencies. As noted above, it is premature and inappropriate to adopt draft changes to the Conservation Strategy in the final plan. The public must be allowed to comment on these proposed changes and that input must be taken into account by the Yellowstone Ecosystem Subcommittee prior to finalization of any changes to the Conservation Strategy.

Our main concern at this time on this point is in regard to process. However, it begs the question of where do changes to developed site standards stop? Changing the Conservation Strategy in this regard is a slippery slope. Given projections of sustained human population growth in the region over the next several decades, will land managers continually “relax” the developed site standards so that the human footprint continues to expand outward until the standards become meaningless? This very real possibility must be part of the discussion on whether or not to approve any changes to the Conservation Strategy concerning the developed site standard.

Connection to Prior Comments

Since the Forest Service did not give any indication in previous plan revision documents that it planned to adopt changes to the developed site standard, particularly without any public comment on the proposal or approval by the Yellowstone Ecosystem Subcommittee, we have not commented on this issue. However, as a new issue not raised previously to issuance of the 2020 Forest Plan, it is clearly subject to objection.

Remedy

The Forest Service should drop its plan to adopt draft changes to the developed site standard of the Yellowstone Grizzly Bear Conservation Strategy in its 2020 Forest Plan.

Objection 9. The 2020 Forest Plan Does Not Include Plan Components to Achieve a Year-Round Bison Herd.

As noted in our comments on the Draft Plan in regard to Alternative D, the Sierra Club strongly supports the Desired Condition FW-DC-WLB-04 in the 2020 Forest Plan, “Bison are present year-round with enough numbers and adequate distribution to support a self-sustaining population on the Custer Gallatin National Forest in conjunction with bison herds in Yellowstone National Park.” We appreciate the objectives to initiate projects to create or connect bison habitat. However, in order to truly establish a sustainable year-round herd of bison on the CGNF, more is needed and we urge the Forest Service to be more pro-active in ensuring a sustainable bison herd will be present year-round.

Connection to Prior Comments

From our previous comments:

“...[W]e appreciate the Forest Supervisor’s efforts to foster dialogue and movement in facilitating presence of a year-round herd on the Forest and urge the Forest Service to continue those efforts despite intransigence from some private landowners.

We support Alternative D’s proactive measures within and outside the bison management zones to maintain or improve existing habitat conditions such that bison can freely move between suitable habitats within the management zones, but also so that habitat conditions outside the existing zones are suitable for increases in bison numbers, distribution, and time spent on the CGNF. (DEIS at 463)

We also strongly support Alternative D’s provision that management actions should not impede bison expansion into currently unoccupied habitat. We support proactive measures to create conditions that are more conducive to bison expansion into currently unoccupied habitat and management actions that favor bison over livestock including closure of livestock allotments, alternate livestock turn-on dates, and change in class of livestock from cows and calves to bulls, steers, horses or mules.”

Remedy

Develop and adopt additional plan components that take specific steps forward in establishing a year-round bison herd on the CGNF. Such components should include specific objectives and standards for working with landowners and FWP over the next three years to facilitate bison expansion in the Taylor Fork on the northwest side, and areas to the north of Yellowstone National Park.

Conclusion

As outlined above, the Sierra Club has remaining substantive concerns with the final 2020 Forest Plan and DROD. We look forward to discussing these issues further and hope that our concerns will be adequately resolved through an objection meeting.

Sincerely,

Bonnie Rice

Bonnie Rice
Senior Representative, Greater Yellowstone-Northern Rockies Regions
Our Wild America Campaign