


PM 9/8/20



Please use the contact information listed above for any communication on this matter as Lead Objector.

Subject: The following objections pertain to the Custer Gallatin National Forest and as stated in the Custer Gallatin National Forest 2020 Final Forest

Original comments submitted June 2019:

Standing:

I understand the proposition the Forest Service extols in that all objections need to be substantive.

The Proposed Solutions:

My objections have proposed solutions.

The link between Objection and prior Formal Comments:

There is a direct link as many of the comments provided before are the same as provided now. My position has not changed and the science has not either. I present the same and some new information because it surely seems that my original comments were ignored. The case we presented in our original comments is the same that we present now. The data backing up those comments has not changed. What needs to change is an openness to accept the data and science as it is and realize the quality of the forest is dependent upon the readiness to accept new upcoming science. The overall purpose here is to provide protection for the resource (in this case wildlife and habitat) for future generations. That was the purpose in my prior comments and that is the purpose now.

I have serious objections to the CGNF 2020 land Management Plan, and these are listed below.

Objection #1: MOUNTAIN BIKING Is Not Sufficiently Regulated

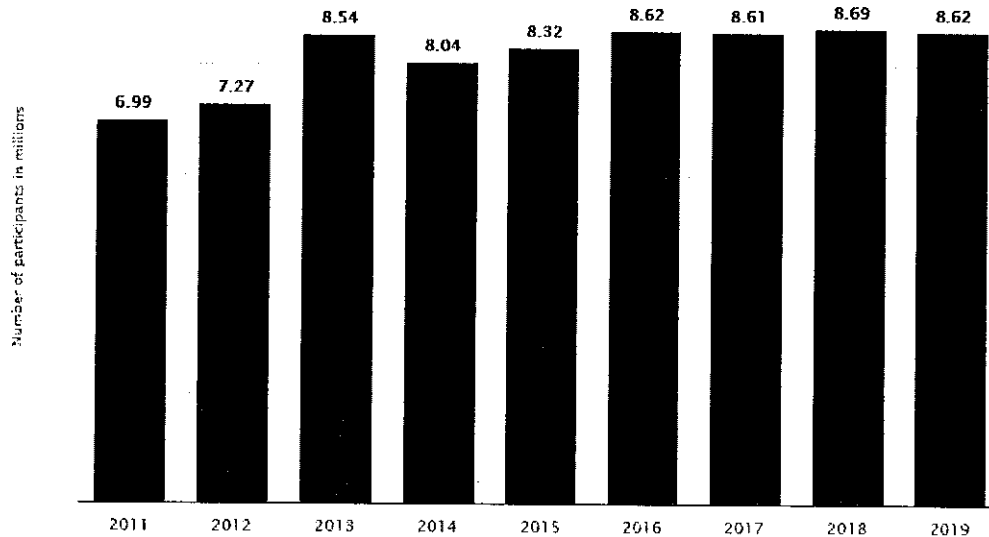
The plan does not regulate mountain biking, and fails to recognize its impacts on wildlife. The plan fails to recognize the demographics of mountain biking, and proposes to allow mountain biking on a disproportionate area of the forest.

Results of a study conducted in the Boulder, Colorado area (a locale frequently compared to the Bozeman area in terms of growth and demographics) demonstrate that **mountain biking** – compared with other forms of outdoor recreation – is an activity that **does not warrant increased access on CGNF lands**. (Characteristics and Preferences of Mountain Bikers on Boulder County Parks and Open Space; A report to Boulder County Parks and Open Space submitted by STACEY SCHULTE-PLANNING ALTERNATIVES 402 MAXWELL #1, BOULDER, CO 80304) Results from the study follow:

- Age – 73% are in their 20's and 30's. Clearly this is a young person's activity, and the CGNF plan places far too much emphasis in catering to mountain biking – a small demographic.
- Gender – 76% are males. The CGNF should be striving to promote recreation that is more gender balanced.
- Ride Frequency – 68% of mountain bikers ride less than 10 times per year.
- Trail Difficulty – 63% of mountain bikers prefer trails that are not “mostly rugged terrain/technical obstacles”.
- Trail Grade – only 31% of riders prefer trails with “long climbs/descents”.
- Most Important Reason for Mountain Biking – only 14% participate for “nature/scenery”; 81% participate for “exercise/sport/challenge”; 0% participate for “wildlife viewing”; 1% participate for “solitude”.
- In the study's conclusion section, the authors state that, “The **typical profile** presented here of the **young, male with a high skill level** and desire for more, difficult trails reflects this distribution”.

Another demographic study shows that mountain biking, contrary to popular belief, is not a growing sport, and in fact participation had leveled in 2016, and has actually declined by 2019. See

<https://www.statista.com/statistics/763737/mountain-non-paved-surface-bicycling-participants-us/>.



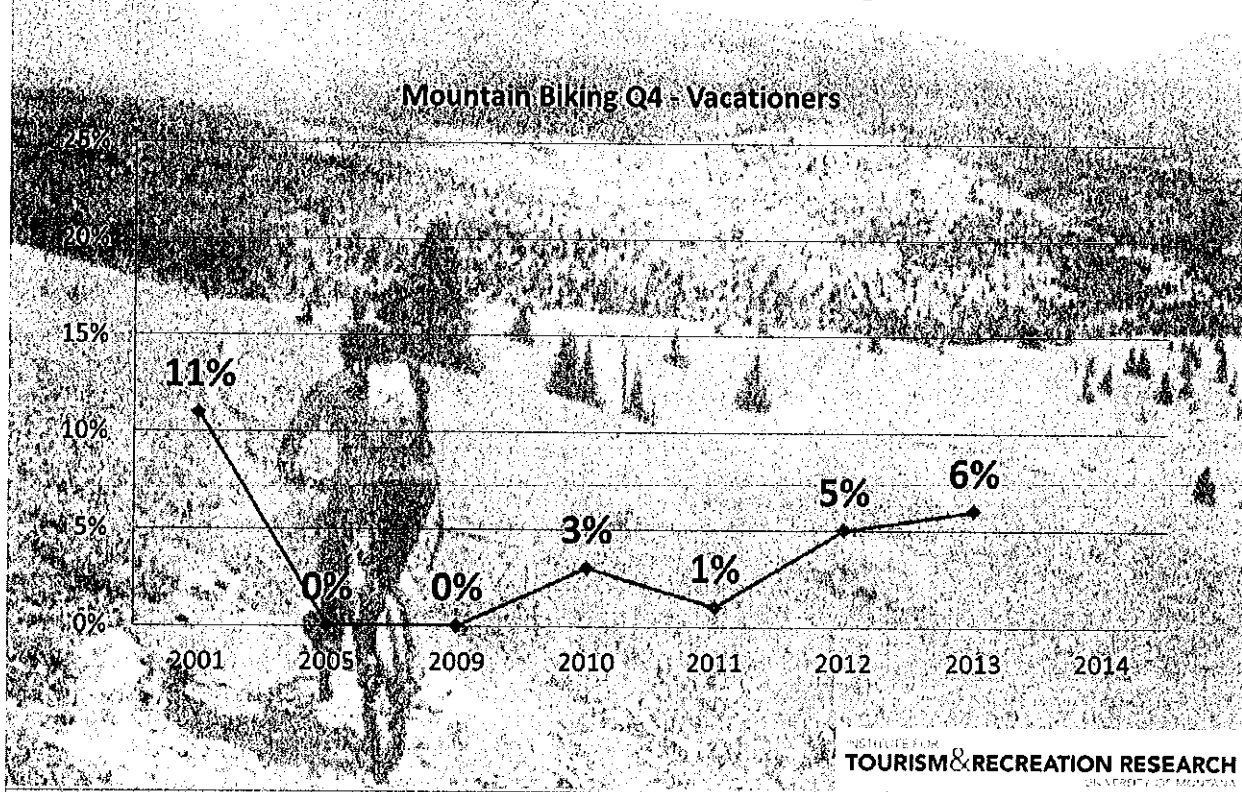
Mountain Biking Must Be Regulated Mountain bike technology has/continues to advance. Vast miles of trails in the CGNF are presently open to mountain bikes, and they do not need additional trails. Mountain biking, because of the speed involved, can be disruptive to other trail users, and is impactful to wildlife.

USNF does not have adequate resources to monitor and study mountain bike impacts on wildlife. In the Elkhorn Wildlife Management Unit, Helena National Forest, rogue mountain bikers have constructed many miles of unauthorized, **Illegal Trails**, frequently exploiting “game trails”. Helena National Forest’s response to these illegal trails is to incorporate them into the existing trails system, in a sad capitulation to its inability to adequately enforce regulations.

Mountain Biking is a Low Participation Activity Mountain biking advocates in Montana are a highly vocal group, particularly those who identify with “singletrack” riding, or “trail shredding”. They demand more riding opportunities, and frequently portray themselves as victims of efforts to exclude this activity.

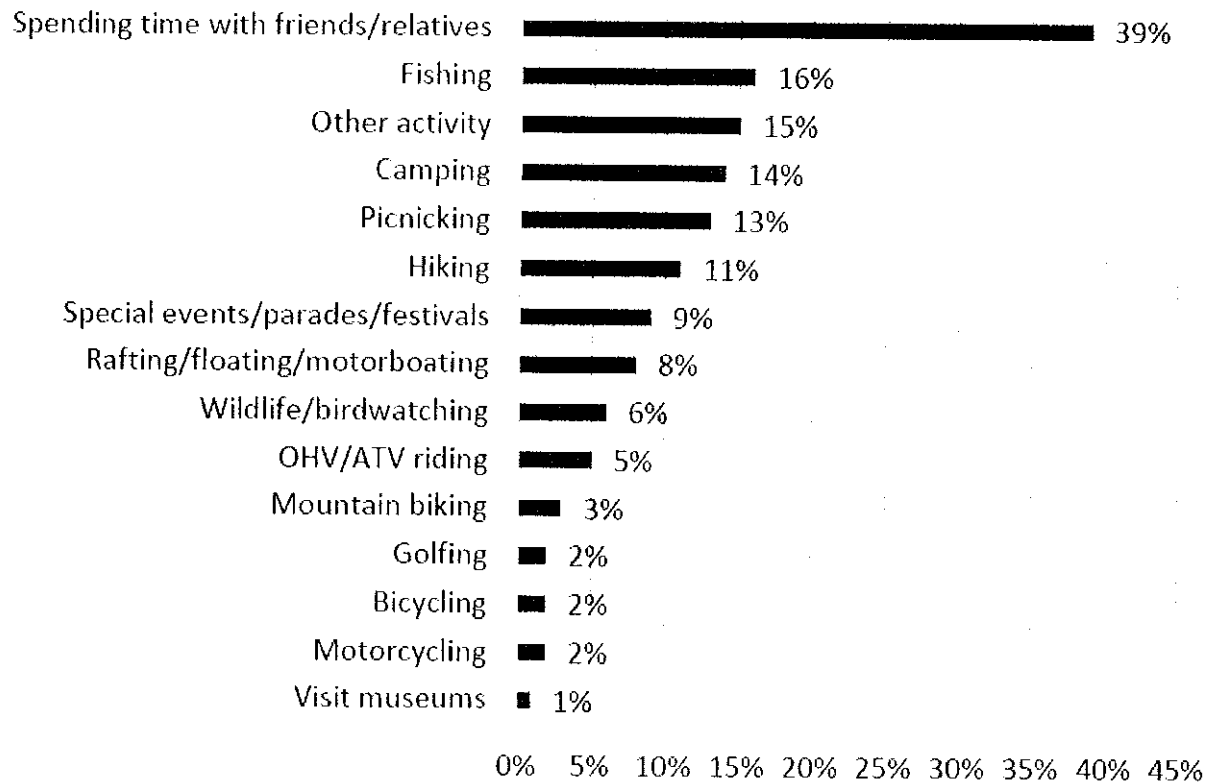
This small faction of mountain bikers is populated by young, fit, adrenaline seeking riders. However, statistically, mountain biking is not a significant activity in Montana. Data presented by the University of Montana's Institute for Travel and Tourism Research (ITRR) shows that only 6% of visitors to Montana participated in mountain biking:

Mountain Biking



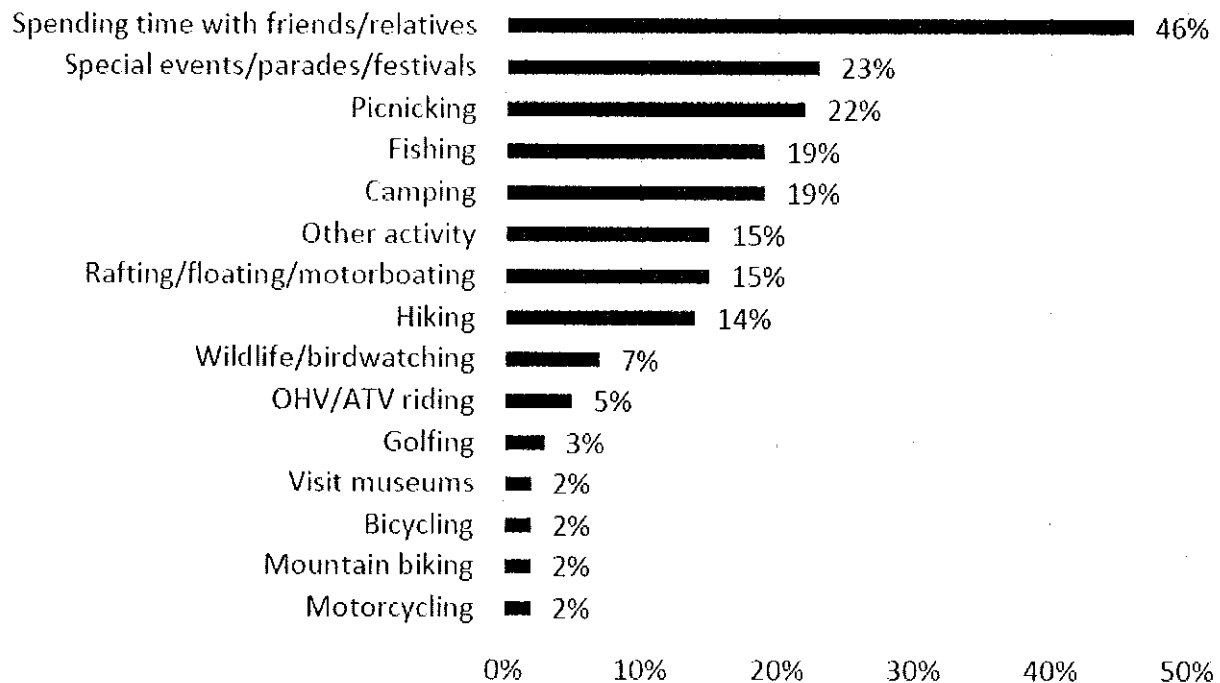
Furthermore, ITRR surveyed Montanan residents regarding their activities during Memorial Day, and July 4th activities for year 2019. These statistics show a mere 2% and 3% participation by Montanans in mountain biking (Source: Montana Trends: Travel and Recreation; 2019; Norma Nickerson, Univ. of Montana; ITRR). And, we must ask - of those who reported participation in mountain biking, what percentage were riding on gravel roads and on biking trails??? Although this data was not analyzed, we can assume that only a portion were singletrack riders.

Activities Montanans will do over Memorial Day Weekend



Source: *Montana Trends: Travel and Recreation; 2019; Norma Nickerson, Univ. of Montana; ITRR*

Activities Montanans will do on the 4th of July holiday



Source: Montana Trends: Travel and Recreation; 2019; Norma Nickerson, Univ. of Montana; ITRR

Again, the results clearly show that mountain biking is an overwhelmingly minor activity, contrary to the impression that groups such as Southwest Montana Mountain Biking Association (SWMMBA) would have us believe. SWMMBA is by the way, affiliated with - and funded by – the International Mountain Biking Association, an insustry sponsored group that promotes a radical agenda for mountain biking access for the purpose of selling more mountain bikes.

CGNF Lack of Resources to Manage Mountain Biking In the 2020 CGNF comment period, several commenters noted trespass situations with both mountain bikes and motorcycles. In its 2012 Forest Plan, CGNF reported on, and produced a map, documenting areas within the Gallatin Range that were experiencing mountain and motorcycle trespass. CGNF has not provided any documentation that it has effectively mitigated this situation, and the public can only assume that such

trespass is continuing, and likely increasing. With strained budgets, CGNF – as in the case with the Helena NF, does not have the resources to adequately monitor such violations.

Mountain Bike Impacts on Wildlife Impacts on Wildlife caused by mountain biking has been studied, and research is showing heightened impacts on wildlife, when compared with hiking:

1. Mountain bikes have a significant impact on wildlife, including increased flight response distances, as compared to hiking. Recent statements by a noted Grizzly Bear researcher, Dr. Chris Servheen (Griz Expert Says Mountain Bikes are a Grave threat to Bears; Mountain Journal, June 3, 2019), raise serious concerns about impacts of mountain bikes on sensitive species.
2. USFS researchers have concluded that: “Our results from 2002 also show clear differences in elk responses to the four off-road activities. Elk reactions were more pronounced during ATV and mountain bike riding and they were less so during horseback riding and hiking.” (Effects of Off-road Recreation on Mule Deer and Elk; Transactions of the 6th North American Wildlife and Natural Resources Conference; Michael J. Wisdom et al; U. S. Department of Agriculture, Forest Service)
3. Both movement rates and probabilities of flight responses were higher for ATV and mountain bike riding than for horseback riding and hiking. Research on the effects of mountain bikes indicates that elk flight responses were triggered at a significantly greater distance by mountain bikes as compared to hikers and equestrians. (Elk Responses to Trail-Based Recreation on Public Forests; Forest Ecology and Management; Michael J. Wisdom, Haiganoush K. Preisler, Leslie M. Naylor, Robert G. Anthony, Bruce K. Johnson, Mary M. Rowland)
4. The Bitterroot NF issued a Record of Decision banning mountain bikes from the Blue Joint and Sapphire WSA’s, stating that mountain bikes would compromise the wilderness character of these lands, which the USFS is charged with maintaining in wilderness condition.

Mountain Bikes in the CGNF

- Should be strictly prohibited from travel in Wilderness Study Areas, and from other wildlife sensitive areas.
- I oppose the recommendations of the Gallatin Forest Partnership, to open the Porcupine/Buffalo Horn WSA to mountain biking, and I oppose the designation of the West Pine area as a “mountain biking playground”. These areas are crucial wildlife habitat, and are crucial connectivity routes.
- Electric Mountain Bikes are becoming very popular, and have the potential to inundate backcountry wildlife habitat with new riders, on machines going faster, further, higher, and deeper into the backcountry. Electric mountain bikes are equivalent to motorcycles, and should be restricted to operate only on trails that are open to motorcycles. Unfortunately, the International Mountain Biking Association (IMBA) – an industry-sponsored advocacy group – has recently adopted a position of promoting Class 1 electric bikes on any trail where pedal powered bikes are permitted. I oppose this position.

Objection #2: Hyalite Recreation Area Should Not Be Expanded

The number of acres presently in the Hyalite Recreation area should remain unchanged. This area has already been developed to the point that it can be viewed as a sacrifice area to recreational development, which presents a hostile environment for wildlife. On any given summer day there are hundreds or thousands of people recreating there. Between January and March, 2013 a study reported 12,742 vehicles entering the Hyalite Reservoir area.

It is to the CGNF's credit that it has recognized the recreational potential of this area, and facilitated ease of use for local residents. However, this area should not be expanded. Expansion would put extreme pressure on wildlife, as well as water resources.

The CGNF has demonstrated a severe lack of ability to monitor and enforce trail use regulations on EXISTING DESIGNATED ROUTES. CGNF has not, in its

plan, demonstrated an ability to adequately monitor and enforce usage lands in an expanded Hyalite Recreation Area.

Perhaps most significantly, expansion of the Hyalite Recreation Area will compromise connectivity routes for wildlife traveling between YNP and points north.

Objection #3: The Plan Fails to Protect Grizzly Bears

The map below shows grizzly observation clustered in the Porcupine Buffalo Horn area, where CGNF is proposing to convert present WSA designated lands to “backcountry area, which weakens the protection for grizzly bear. This is regressive protection for an endangered species.

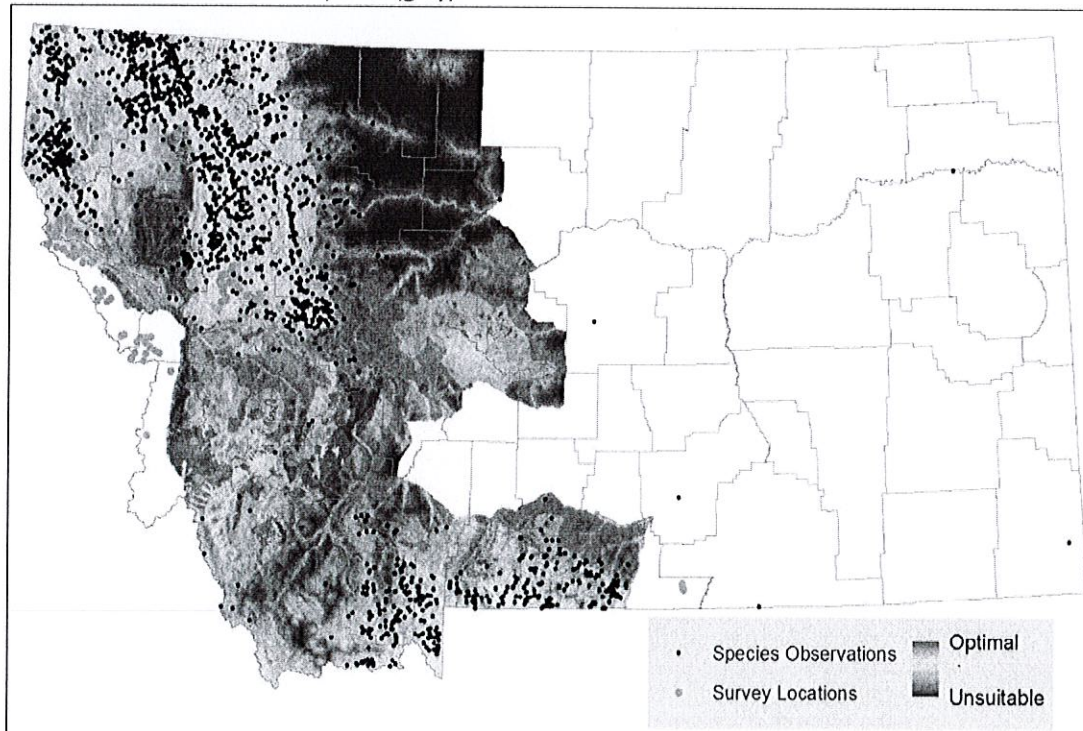


Grizzly_Bear_AMAJB01020_20171109.pdf

Grizzly Bear (*Ursus arctos*) Predicted Suitable Habitat Modeling

November 9, 2017

Figure 7. Continuous habitat suitability model output with all 2,233 observations (black) and survey locations that could have detected the species (gray).



Regarding safeguarding grizzly bears into the future, Designated Wilderness does provide de facto protections for grizzly bears on the CGNF. Even so, fully 33% of the DMA (Demographic Monitoring Area) is both outside of Wilderness Areas and outside the bounds of minimal protections offered by standards applied only to the PCA (Primary Conservation Area). As important, the numerous serious shortcomings of CGNF Plan standards makes Wilderness Areas all the more important given that they alone provide grizzly bears with meaningful de facto protections. Notably, roughly 52% of the PCA and 59% of the DMA are outside of Wilderness Areas, in areas where meaningful protections are absent.

Objection #4: Porcupine/Buffalo Horn Should be Designated Wilderness

In examining a map of the Greater Yellowstone Ecosystem the following pattern is clear: the **entire** eastern and southern boundaries of Yellowstone NP (YNP) have adjacent wilderness areas. It can be easily argued that these wilderness areas play a highly significant role in protecting or buffering YNP – and its abundant wildlife – from disturbances. This is demonstrated by the extensive use of these wilderness areas by hunting outfitters, who take advantage of robust game populations.

Conversely, the western/northwestern boundary of YNP has no adjacent wilderness, and the northern boundary of YNP is only partially bounded by wilderness. The PBH represents a unique once-in-a lifetime opportunity to protect this highly productive area, and to add to the wilderness bounding YNP.

This area is particularly threatened because of its proximity to the Big Sky Mega Development, whose proximity threatens to turn this crucial wildlife habitat into a recreation playground, and resultant heavy impacts on wildlife.

Of all the lands within the CGNF, I believe that the PBH is unquestionably the most important wildlife habitat, forest-wide. Specifically:

- Important Grizzly habitat including denning sites
- Elk calving and migration area
- Wolverines have been documented
- Relatively low relief, low elevation provides quality habitat

- Both the Wilderness Society and the Greater Yellowstone Coalition have provided Congressional testimony in support of the area's importance for wildlife, in sharp contradiction to their present weak positions.

I recommend the following management actions in the PBH:

- Full wilderness designation
- Rerouting of the Big Sky Snowmobile Trail to closely parallel HWY 191
- Banning motorized and mechanized transportation (including mountain bikes)

Objection #5: Gallatin Forest Partnership Operated Illegally & as Such CGNF Cannot Consider the GFP Recommendations

During the formative meeting of the GFP, 5 members of Gallatin Wildlife Association were in attendance, and all 5 members expressed a strong desire to be involved in the GFP. All of us were gravely concerned that there was no representation in the GFP by any wildlife advocacy groups, and we believed that wildlife was being seriously shortchanged. None of us were ever "invited" back to participate in any of the GFP's subsequent meetings.

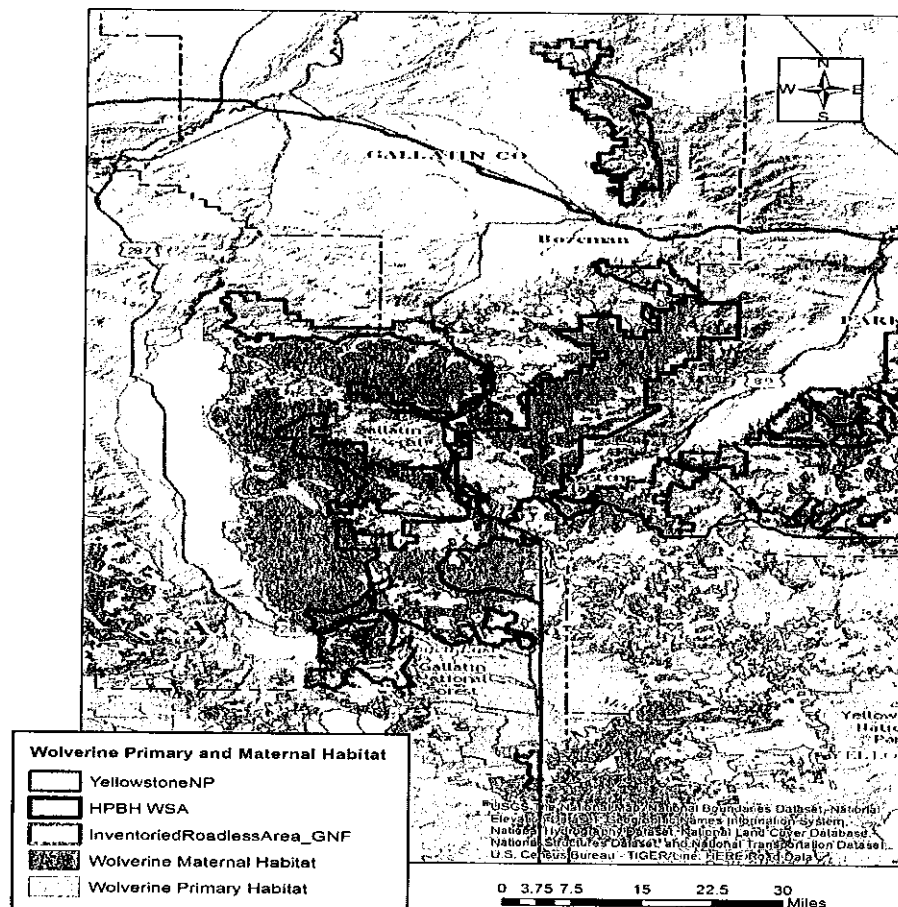
The GFP's action smack of a "frontloaded" process, where it had preconceived and predetermined outcomes, and it was intent on excluding participation by any group that would interfere with those goals.

The GFP's actions in this regard are a clear violation of the the Federal Advisory Committee Act (FACA). The Federal Advisory Committee Act became law in 1972 and is the legal foundation defining how federal advisory committees operate. The law has special emphasis on open meetings, chartering, public involvement, and reporting.

Objection #6 CGNF Failure to Protect Wolverines

It is estimated that only 300 Wolverine remain in the lower 48. Clearly, this species is not listed as endangered solely for political reasons, and recent court rulings may well result in ESA listing of the wolverine.

Wolverines have been documented in the CGNF (USGS Map, below), including both maternal and primary habitat (Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area; Craighead, Lance; 2015). Craighead also cites the importance of connectivity for continued wolverine populations, with connectivity with both the Colorado Rockies – and of specific importance for the Gallatin Range – connectivity with the Canadian Rockies.



MAP (USGS) DOCUMENTING WOLVERINE PRIMARY AND MATERNAL HABITAT.

Objection #6: CGNF Failure to Use Best Available Science

CGNF is mandated to use the best available science in the planning process. Specifically, there is no reference anywhere in the planning document of a study by highly respected wildlife biologist Lance Craighead. CGNF's failure to include this work in its planning process represents gross negligence regarding wildlife

management. The document to which I'm referring is: "Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area", A Report for the Lee and Donna Metcalf Foundation By The Craighead Institute, Frank Lance Craighead, PhD, November 2015

Conclusion

These objections were written on September 7, 2020, and will be submitted to CGNF prior to the submission deadline.

