Comment to Custer Gallatin National Forest Plan 9-2-20

I previously commented on this Plan on 4/22/2019. Here are my objections below due to the fact you came up with a new Alternative F that still does not address my issues and concerns and am extremely disappointed.

1. **Representation Fairness**. I was a part of your original public collaborative group to discuss public options for the forest plan. Later you disbanded this effort and decided to cooperate with the so-called Forest Partnership without requiring them to notify and include people that you know were originally involved and wanted to participate. I was a member of two of these non-profit organizations (GYC, MWA), and they failed to notify and include me in their discussions and their decision making. Mary states in her Record of Decision “For this landscape, I found the work of the Gallatin Forest Partnership to be the most compelling, etc.” She said Gallatin County Commission endorsed the Gallatin Forest Partnership proposal… The Gallatin County Commission was made up of 3 Republican Commissioners and now 2 Republican Commissioners, one of which when asked by me, does not consider residents of the City of Bozeman to be under his representation. This so-called partnership colluded with bicycle interests, therefore you/they totally did not represent me and all the “quiet recreation” types of people who do not bike in the CG Forest, but who walk, photograph, bird watch, plant identify, look for wildlife; and/nor want the forest’s primary goal to be wildlife habitat.
2. **Recreation and Bicycles**. You are using “Recreation” to include totally diverse people and methods of transportation on the forest throughout your entire plan. “Recreation opportunity spectrum” definitions are for type of trail/road but do not have percentages by geographic area provided in the plan. Only primitive and semi-primitive are the categories that include me and people like me. My husband and I can only walk 2-3 miles round trip (at our age and health), and most wilderness areas are difficult to access (I want more wilderness for wildlife habitat and migration, so just explaining when it comes to my hiking.) I want to be able to hike in solitude in the Gallatin’s, Hyalite, and Bridgers that are easy to access from highways and roads. But you are allowing bicycles in more and more parts of the CG Forest, and most of these trails that we utilize are narrow, and with bicycles allowed on them, it ruins my experience and is dangerous. Your “recreation” and “back country” groups are totally biased toward mechanized travel (bicycles). Did you do a study of the age, gender, race, type of forest use, etc. to know who is included in your “public” respondents – this should be done so you can break up “Recreation” into divisions of the whole so everyone can receive value from this plan and usage of the CG Forest. My experience hiking on CG Forest trails that are shared with bicycles is that these riders appear to love mostly the “amusement park” thrill (observing their high speed especially downhill, their lack of safety when coming upon walkers, their straight-ahead look, wearing earphones, not slowing down to listen to birds, look at flowers, etc.). They do not enjoy the nature surrounding them viewing/listening/photographing, and they interfere with wildlife (animals, birds, insects) ability to be/stay in the surrounding forests, and interfere with my enjoyment to walk quietly, viewing, looking for/ listening wildlife. “Recreation” should have been finetuned to provide specific values to each type/group of people and their methods of transportation/enjoyment of the forest. Bicycles now include the new technology with a motor “E-bikes”, so they can travel higher speeds, allow more “less fit” people to ride on forest trails. You did not define bicycles in the Plan Glossary, although it is included on page 126-127 of the Land Plan. It includes “motorized and nonmotorized uses, and a high density of human activities and associated structures.” There is absolutely nothing written about protecting the existing wildlife habitat, wildlife and wildlife migrations. You include bicycling in with non-motorized and now e-bikes will be in the motorized category (you do not mention this type of vehicle.)You do not address the increase in volume of bicycling, other than appealing to the nearby communities who want to make money from tourism dollars. Additionally, since you admit the expanding populations of people moving into Gallatin County, putting more pressure on usage of the Forest (fastest growth in the nation for our size community); you also want to continue levels of logging, mining, grazing, and your want for communities to make more money from tourism, you are squeezing out wildlife, wildlife migration, and my quiet type of “recreation”. Having lived in Bozeman for 41 years, I see fewer and fewer places for my husband and I to hike and cross-country ski in the nearby forests on public lands. I am also concerned that you never once mentioned “climate-warming or climate change”. You are not planning for increased populations, more fires (Bridger Foothills file is unbelievably destructive and lucky it didn’t go west and hit Bozeman; probably due to some hiker with a cigarette), disease, increased temperatures, changing seasons, pests, etc. You are not forward thinking/planning over the 15 year life of this proposed plan, and you are not fairly dividing up the CG Forest for users that don’t spend much money for their recreation; and you are not dealing with the dwindling secure/adequate food/habitat for all the iconic species of wildlife that need to move to and from other forests in Yellowstone and in the Big Belt Mountains through the CG Forest. I am very depressed with your directions. On page 33 of the Draft Record of Decision, Mary selects Alt F for its “mix of recommended wilderness areas, backcountry acres, recreation emphasis areas, and lands suitable for timber production.” This mix is not fair nor equitable – 4% wilderness, 7% backcountry, 8% recreation – this is 4% wilderness versus 15% non-wilderness recreation. This is substantially smaller wilderness than provided in Alt C & D, but the best analysis would be to look at each geographic area and even should split Bridger-Crazies due to their wide distance apart. This forest is so large and diverse, it is not truthful to use just forest wide %. Just looking at the Bridgers, Wilderness is 0 (I’m not a Crazies user so it is irrelevant to me, although I’m glad you are proposing a small Wilderness there). In the Madison, Henrys Lake, Gallatin’s, Wilderness is 27% and Backcountry and Recreation are 73%, in which both of these allow bicycles. So, you are unfairly treating quiet hikers and wildlife habitat/wildlife migration.
3. **Wilderness Hyalite-Porcupine-Buffalo Horn**. You are negatively influencing Congress in its future decisions on Wilderness designation of the Hyalite-Porcupine-Buffalo Horn Wilderness 155,000 acre Study Area by your opinions and designation of part of this WSA into non-wilderness; including making up a new category of Backcountry Area and Recreation which allows motorized and nonmotorized with bicycles included in both categories to the exclusion of hikers/non-bikers like me. These lands contain critical wildlife habitat and migration routes from and to Yellowstone National Park. You and your Forest Partnership made up of bicycle users/promoters are hurting my and others like me ability to influence my publicly elected U.S. Congressional Legislators. I realize you cannot legally change the WSA until Congress makes a decision, but you are biasing Congress toward reducing the current size of this WSA.
4. **American bison** are our National Mammal, which you did not mention. They should be allowed to migrate naturally just like other wild mammals, from and to Yellowstone National Park and CG Forest surrounding the Park, including into the Gallatin’s adjacent such as the Taylor Fork, and other public lands. These surrounding forests should not have a preference of cattle grazing. You discuss wild bison, admitting they are unique, are of great importance which I agree, but do not define habitat standards nor designate them as a species of conservation concern. “At the time the plan was written, bison were located only in the Madison, Henrys Lake and Gallatin Mountains Geographic Area and the Absaroka Beartooth Geographic Area”. This statement doesn’t recognize that they have been restricted by various government entities for years, so we don’t know what their natural migration and living patterns would be. The Interagency Bison Management Plan has been a failure, including the rounding up, harassing, injuring and killing thousands of them, and setting unscientific “interagency targets for bison population size and distribution” because “cattle are king” attitude by these government agencies and the lie about brucellosis – cattle can be vaccinated and kept away from wild bison just like other standard methods of managing cattle. Wild bison will not survive with these attitudes and Forest Plans from government agencies, too powerful/influential cattle people, without establishing required wild bison habitat and connectivity needs in writing and mandatory for everyone to obey. This is the reason designating them as a species of conservation concern is crucial. Did you know that the US Department of Interior press release from May of this year “Interior and Partners Commit to Long-Term Initiative to Conserve the American Bison”? Secretary Bernhardt said “This 10-year plan will guide our collaboration with states, tribes, private conservationists and managers across public lands to advance conservation efforts and honor iconic wild bison.” You need to become part of the DOI Bison Working Group to participate in the goals of wild, healthy bison herds; genetic conservation; shared stewardship; ecological restoration; cultural restoration. And include this in the CG Forest Plan 2020.
5. **Ecosystems & Linkage**. Your glossary states “greater Yellowstone area (GYA) and ecosystem (GYE) Generally high elevation mountainous public and private lands in northwestern Wyoming, southwestern Montana, and eastern Idaho surrounding Yellowstone National Park.” This definition must include, not just surround Yellowstone National Park. The Gallatin Range WSA is the last and largest wild mountain tract bordering Yellowstone National Park without full wilderness protection. The Gallatin Range is an important connectivity corridor and wildlife refuge, home to all the iconic wildlife for which Yellowstone is famous – grizzly bears, elk, moose, lynx, wolf, wolverine, elk. Your glossary does not include “key linkage areas” or “linkage” or “migration” so not sure what you mean, what your goals are, how you will achieve them; but maps are marked such as “Bridger Key Linkage Area”. Presumably, you are interested in migration routes for mammals so they can obtain security, food, mating, etc. in other areas. However, the Bridger Key Linkage Area has the Blacktail Peak Backcountry Area to its north and various recreation trails and I-90 to the south, so there is no safe way for wildlife to migrate north or south. An underpass on I-90 should be included in the plan to allow the free and safe migration of wildlife from the Gallatins to the Bridgers and vice versa (which will also save thousands of dollars in vehicle damage and human injury from the hitting/killing of wildlife on I-90 and there are grant funds available and other States and Canada have shown very successful under and over pass solutions.) There are other national forests north of the Bridgers with mountainous terrain, such as the Big Belt Range, so a route should be identified.
6. **Wilderness in Bridgers**. You have eliminated all wilderness in the Bridger and Bangtail mountains and Mary says “I decided not to add any recommended wilderness areas in the Bridger Range because it would detract from the management flexibility needed to balance the complexity of recreation uses and the need for protection of infrastructure (such as homes, ranches, and ski areas). She goes on to say she appreciates the value as an important wildlife corridor between GY & Northern Continental Ecosystems but she claims to address this as a key linkage area. As mentioned elsewhere, there is no definition or planning about key linkage and actually putting these lands into use. She’s actually calling the Blacktail Peak area backcountry, which allows motorized and non-motorized with bikes, and how it can accommodate migrations of wildlife, with the interference from snow machines and bicycles. Both wilderness areas proposed in Alt D do already contain mining, oil & gas permits and grazing allotments, which when combined with trying to protect private landowners below the wilderness area from mountain fires, plus the occupation of thousands of acres for ski areas in the Bridgers demonstrate her bias against wildlife habitat, primitive recreation and her wanting to help all the bicyclers, profits to communities and businesses. These lands are already mostly “inventoried roadless areas”, elk, grizzly and wolverine habitat, and “offers opportunity for solitude and primitive and/or unconfined recreation” – you don’t even address wildlife habitat nor wildlife migration (page 264 and 257 In the summary). No future protections are provided from the actual mining and oil and gas and the trail damage from bicycles, future expansion of e-bikes, motor vehicles damage. The percentage of all of the forest lands in the Bridgers needs to be more fairly allocated as you currently discriminate against non-bicyclers. You need to add wilderness onto the west side of the Bridgers for wildlife habitat & migration and quiet recreation – primitive (no bicycles) and protect these lands from mining/oil & gas damage (I know they can do the drilling, but if in the wilderness, many more restrictions of methodology, process and cleanup would be required).
7. **Wilderness Madison, Henrys Lake & Gallatin**. As mentioned in the WSA section, I am very disappointed about you breaking up the Highlight-Porcupine-Buffalo Horn WSA. You give away the Buffalo Horn to Backcountry which is motorized/non-motorized, so wildlife habitat is not a priority, but it should be due its importance for grizzly, wolf, mountain goat, wolverine, bighorn sheep, moose, mule deer and should be for wild bison. You are too stingy in your wilderness designations and only name 92,000 out of 155,000 for wilderness, and you miss thousands of adjacent and nearby lands which have grassy valleys and slopes and are exceptional wildlife habitat, especially for thousands of elk in the winter. Your Plan Allocation acres for this area shows 26.8% Wilderness and 73.3% for Backcountry and Recreation (which includes bicycling). Very unfair! Please put the entire HPBH WSA and 111,000 acres in the Cabin Creek RWMA between Taylor Fork and Hebgen Lake, between Monument Peak and the main crest of the Madison Range into Wilderness at a minimum due to their outstanding wildlands, wildlife habitat and migration routes. Better yet, please go back and review each proposed wilderness in Alt D and re-prioritize wildlife habitat and migration routes to put them into Wilderness proposed. Specifically, I prefer adding back Lionhead, Buffalo Horn, Cowboy Heaven. You state for several of these areas “Mountain biking is suitable only on approved system mountain biking routes.” But you haven’t defined what this means, and most often in my experience, it is the same narrow trails with flowers/bushes very close to the trail so there is not a safe way to have both bicycles and non-bicycle travel, and bikes ruin my experience and sense of safety. Your excuses were “after roads were buffered, the remaining area was not large enough for a stand-along recommended wilderness area” or “the area adjacent to Yellowstone National Park is too small to be manageable as a stand-along recommended wilderness area”. These are asinine comments. Your charts in the FEIS for each possible wilderness area only list public comments received in favor and ecological and social characteristics usually include areas for solitude, primitive recreation, adjacent to existing wilderness, naturalness, undeveloped quality is high. There is not a single comment about wildlife existence, potential, migration routes, habitat value, so you did not do a thorough job of analysis nor even understand that “ecological” includes animals or have a category “Wildlife”. Another example of your bias toward commercial businesses and communities making money, motorized and bicycling, timber harvest, grazing leases and now you add “recreational facilities with no definition” and a possible airport or landing field. In a few cases there is an existing fence or irrigation development – these are minor, can be corrected, and were probably illegally allowed or not dealt with properly when they should have. You also do not compare the CG Forest roads and motorized trails now and future with the entire road/trail system already in existence in Montana, Wyoming, Idaho. The public has paid for all these roads/trails and most of them are usable by bikers, motorized visitors. The number of primitive and non-motorized/bike trails is very small, made smaller by the unfair Trail Sharing travel plans, and now this CG Forest Plan 2020, takes even more backcountry/wilderness lands for motorized/or non-motorized bikers away from my type of travel and from wildlife habitat. You are squeezing me and my type from a fair share of the CG Forest and ruining, especially in light of climate change, the ability for critical wildlife species to live and migrate throughout the forest safely. The GYE is the largest intact functioning ecosystem in the temperate zones of the Earth and you are reducing the protections with this Plan. You must consider the larger area than just the CG Forest and for example only 3.7% of Montana is Wilderness; Big Sky commercial/residential development was already allowed to be built and it removed thousands of acres of lands that should have been Wilderness or at least managed forest land. This community is growing, causing water pollution to the Gallatin River and many other impacts on public recreation and wildlife habitat/migration. But because it is already there, you are including it as a community like Bozeman, West Yellowstone, etc. and feel you need to provide as much income/revenue to the community as the others and making this a major reason for fewer amount of Wilderness, more developed recreation, more miles of bike trails and users.
8. **Backcountry Area** is also not included in the Glossary along with the rules and types of use allowed described, but is included on page 125 of the Land Management Plan. It is described very broadly as “either unroaded or few, primitive roads.. more remote, semi-primitive opportunities, both motorized and nonmotorized.” These are very conflicting uses and if this is what the travel managers will review, they’ll have total carte blanche to make these areas for the “amusement park” type of recreation; there is no mention of on-going wildlife habitat and migration routes for safety, food and mating needs. Looks like bicycles are allowed in this area since motorized is, so again, this is a large threat to migrating wildlife. How does Backcountry Area meet the requirements of Inventoried Roadless? You’ve taken all potential wilderness from the West side of the Bridgers – one of the most accessible areas from Bozeman and especially for me and people like me who want quiet, walking in the forest, like Truman Gulch, one of the most beautiful trails available. But I need to share it with bicycles, which are not quiet, speed through on the trails. Even your shared use signs at trails are unfair – only one day with no bicycles allowed. Most other Bridger west side trails allow bicycles. Middle Cottonwood Trail that I walked in July has a Shared Trail Uses sign in which hikers like me get one day – Sunday – 14% and bicycles get 86%of the week to use the trail. An example in the Gallatin’s is the East Hyalite Trail No. 531 that we hiked in July this year, the Timeshare Trail sign shows no bicycles on Sunday and Monday with the other days allowing bikes, so 30% for me and 70% for bicyclers and 40% for motor users. I know you are not including the Travel Plan in this Plan 2020, but it sets up Forest Personnel to be very biased toward bicycles compared to quiet hikers and no protections for wildlife.
9. **Climate Change**. There is minimal concern with climate change and the dire predictions of the Montana Climate Assessment. Your plan is for 15 years so this is outrageous to not deal with climate warming and instability, disease, fire, pests and ways to sequester more carbon. Planting new trees or promote more natural expansion and keeping trees from logging are major ways to sequester carbon, and in addition it will be harder to do so because of what I mentioned. We don’t have the same weather as 40 years ago and longer, when the climate created a hundred-year tree growth cycle, affording regular logging. You are planning on as much as 40% of the forest deemed suitable for timber production and harvest. This makes no sense. It is not the Forest Service’s job to keep private logging companies in business and making a profit.
10. **Wildlife**. Only listing 4 animals listed as species of Conservation Concern is also outrageous. This plan is so biased toward logging, motorized and bicycling (amusement park type recreation) when you know grizzly bear and wolverine and bison, for example are vulnerable to climate, fire, motorized recreation, logging. Bison need to be able to roam free within the CG Forest and you need a specific plan to deal with them and many other species. You have no right to allow cattle grazing and other commercial development rights over wild bison’s rights to survive, roam and migrate. Humans can learn to live with bison just like they do with large ungulates like elk, moose, and deer. I understand that the Craighead Report was not listed in the cited literature for this Plan development, which should be included, and it said the HPBH WSA is considered an intact ‘ecosystem’ or critical component of a larger GYE and should be protected from further human alteration and disturbance. We need Wilderness proposed in Alt D to adequately preserve and prioritize wildlife, wildlife habitat, wildlife migration routes. All Wilderness Study Areas should remain as is so that Congress and its constituents get input, not just the biased sample of the public that participated or was included somehow in this Land Plan 2020.

There are hundreds of other areas that I wish I had the time to comment about. This is such a complicated process with many laws and regulations that you must comply, and with 3 major lengthy documents to read, consolidate and understand, it’s hard to imagine most of the general public would know how to or have the time to comment. Organizations are the exception, so realize the bias. But I sure hope you read and improve your Plan to address my issues and the unfairness you have built into your methodology.

Patricia Simmons  
357 Pine Creek Drive  
Bozeman, MT 59718  
[psimmons100@gmail.com](mailto:psimmons100@gmail.com)  
406-581-7317

Member of many environmental organizations, and a lifelong environmentalist and a Bozeman, Montana resident for 41 years. Writing this on my own.