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Comments: Attached are my comment and 2 supporting documents. My comment is also pasted here:

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June 5, 2019

Mary Erickson, Supervisor, Custer Gallatin National Forest
Attn: Forest Plan Revision Team,
P.O. Box 130
Bozeman, MT 59771

Dear Supervisor Erickson and Plan Revision Team,

My focus in these comments is the Gallatin Range. I first hiked into them as a freshman in college back in the 70's. By the end of that decade, I was involved with the Gallatin Wildlife Association and the Madison-Gallatin Alliance in working to get the USFS to protect this very important part of the Yellowstone Ecosystem. Over the years, I have hiked, skied and backpacked extensively throughout the Gallatin Range, especially the roadless portion, so I know it very well. I have seen significant abuse and resource damage caused by mechanized users from Bear Canyon to Buffalo Horn.

History shows that the Gallatin Range is not just the average piece of National Forest. Senator Lee Metcalf, in his prescient piece of legislation to recognize the outstanding values of Montana's wild lands, included the Gallatin Range in the Montana Wilderness Study Act. The Madison-Gallatin Alliance included the roadless portion of this range in the Lee Metcalf Wilderness proposal; but politics outweighed the local, grassroots group at that time, and was dropped from the Wilderness Bill.

Forest Service management of the Gallatin Range has not exactly been up to the intent of Senator Metcalf's legislation; the intent of the law was not met in that wilderness study area. That is commonly recognized given that the USFS lost a lawsuit for its failure to follow the law in managing the Gallatin Range.

I am pleased to see, in this forest plan revision, that the Custer Gallatin National Forest (CGNF) includes Alternative D, which I believe is the only proposed management direction that meets the needs of our national forest land not only in the Gallatin Range, but throughout most of the CGNF. I urge the decision makers to choose and implement this alternative.

The National Park Service, on their website (<https://www.nps.gov/yell/learn/nature/greater-yellowstone-ecosystem.htm>) notes that "... Greater Yellowstone Ecosystem. At 34,375 square miles (89,031 km²), it is one of the largest nearly intact temperate-zone ecosystems on Earth." It is critically important that the CGNF recognize the significance of not fragmenting the Gallatin Range in light of this statement. Only Alternative D would meet the needed management direction to maintain the integrity of the Gallatin Range as a keystone of this globally important ecosystem. Other literature has noted, also, that it may well be the largest, essentially intact temperate forest ecosystem left on the planet.

The NPS goes on to state that "Management Challenges" include climate change, invasive species, managing an ecosystem across political boundaries and land use change. The CGNF planning document has not captured

the importance of its role in sound ecosystem management at this globally important level. In the previous Gallatin NF (GNF) Management Plan process, my comments included an extensive discussion of the FS legal requirement to address cumulative impacts. The CGNF should step up to the management plate in this planning process and recognize that the cumulative impacts of any of the proposed alternatives -except Alternative D- could very well have significant cumulative impacts on the long-term viability of the whole of the Yellowstone Ecosystem.

When the GNF did its analysis of what was labeled the Northern Rim, the area south of Tom Miner Basin to the Yellowstone National Park boundary, the FS failed to recognize both the cumulative impacts of its proposed action and, most importantly, the significance of the biological viability of the area. Independent biologists at the Meis - Custer Gallatin NF plan revision comments, 6-6-19Page 2

time pointed out that the National Forest lands in the southern portion of the Gallatin Range , adjacent to YNP, had an unparalleled wildlife diversity that included more of the native wild species than virtually anywhere else. This is too important to ignore.

The heavy push by mechanized users to open up more of the Gallatin Range for recreation that is incompatible with maintenance of the superb biodiversity of the area should be rejected in favor of protecting the globally important, essentially intact Yellowstone Ecosystem. In the early 80's, the late Bob Garner, who founded what is now Summit Motorsports, told a friend of both of ours that the mountain bike (while the two of them were riding mountain bikes in the Gallatin Range) is not significantly different that a motorcycle in its impact in causing resource damage. As the CGNF well knows, off road vehicles and mountain bikes cause significant resource damage. It has been documented at the head of Rock Creek and in many areas in the Bridgers. I have personally seen - more than once - damage in the making as mountain bikers brake their way down Fox Creek in South Cottonwood drainage. There are countless other examples that I know many commenters on this plan have documented.

Most importantly is the indisputable fact of wildlife disruption caused by mechanized users. The modern me-now cadre of mountain bikers have a strong tendency to ignore facts. I know, as I know a lot of them. Some of my friends in Bozeman will no longer talk to me because they are petty about the fact that I point out the studies and data, which I trust the CGNF has at hand. When I was doing literature research for the Lee Metcalf Wilderness Proposal back in the late 70's, I met a researcher from the Forest and Range Experiment Station down in Laramie, WY, who told me of his study on the impacts of motorized vehicles versus those on foot, and sent me a copy of it. I passed it on to a wildlife biologist in Bozeman so I have even forgotten the researcher's name. By measuring the heart rate of elk he determined that while the elk may not move when the motorized vehicles passed at a given distance, their heart rate went up significantly compared to when foot traffic went by. The average user would say no difference because the animals didn't appear to act differently, but the impact of the stress is measurable.

The pinnacle species is the grizzly bear. National Park Service management of the portion of the Gallatin Range within the (artificial) boundary of YNP shows the importance the NPS places on protecting both the grizzly and the user. It is the responsibility of the CGNF to reciprocate in the protection of the critical habitat of the Gallatin Range for not only the maintenance of a healthy grizzly population into the future, but for the long-term viability of the globally important nature of the Yellowstone Ecosystem.

A recent article by Todd Wilkinson in the May 22, 2019, issue of Mountain Journal collects and presents some of the most important points about why we need to see Alternative D be the decision of the CGNF.

Dr. Christopher Servheen, retired from government service, spent four decades at the helm of the U.S. Fish and Wildlife Service's Grizzly Bear Recovery Team in the West. He is an adjunct research professor in the Department of Ecosystem and Conservation Sciences at the University of Montana.

Servheen says that despite assertions by mountain bikers, the scientific evidence on impact is pretty clear based on human-bear incidents that have happened and thousands of hours of field observation and radio tracking of grizzlies.

"I do believe that mountain bikes are a grave threat to bears-both grizzly and black bears-for many reasons and these are detailed in the Treat report and recommendations," Servheen told Mountain Journal. "High speed and quiet human activity in bear habitat is a grave threat to bear and human safety and certainly can displace bears from trails and along trails. Bikes also degrade the wilderness character of wild areas by mechanized travel at abnormal speeds."

Attached is a copy of Mr. Wilkinson's article as evidence for my position that Alternative D must be chosen.

This is an extremely important statement from a grizzly bear biologist who spent his professional life involved deeply with what was happening in the Yellowstone Ecosystem. You should be very familiar with the Treat Report. The basic summation of the report said, as Mr. Wilkinson wrote, is that Mr. Treat "... was traveling at between 20 and 25 miles an hour and rode into the grizzly around a sharp turn in the trail, leaving him only a Meis - Custer Gallatin NF plan revision comments, 6-6-19Page 3

second or two to respond. The bear then responded defensively, demonstrating no pattern of otherwise being aggressive ..." I think back to what grizzly bear biologists and my good friends, now departed, Dr. Charles Jonkel and Bart Schleyer taught me about traveling in grizzly bear habitat. Schleyer, whose work with the Interagency Grizzly Bear Study Team included observational behavioral studies of the impact of passing hikers on bears, made it very clear that you do not want to surprise a grizzly while hiking.

It is obvious beyond a shadow of a doubt, as Dr. Servheen points out, that the likelihood of a grizzly- mountain biker encounter not ending well is very great. Bart, were he still with us, would be very aghast at the poor attitude that mountain bikers have towards this sensitive species. There is no way that a mountain biker can actually act in a 'bear aware' fashion in grizzly bear habitat. Grizzly bear habitat, of which the Gallatin Range is notable for being, and mountain biking are incompatible. Period.

The Gallatin Range is no place to test the theory that Mr. Treat's accident may have been an isolated incident. As I have been saying for about 40 years now, if there is room for error, managers must err in favor of the grizzly bear. This is one reason that Alternative D is the only viable long-term management proposal that make sense for the CGNF, and especially the Beartooth, Absaroka, Gallatin, Madison and Lionhead ranges.

I am attaching the text of a letter that was written and signed by about 100 prominent scientists, ecologists and conservationists. As an active conservationist and involved commenter on Custer Gallatin National Forest issues for nearly 40 years, I understand and agree with that letter. You have received comments from many of the scientists who signed on to that letter. I support what they say and reiterate that it is obvious that from a biological and ecological perspective, only Alternative D is capable of meeting the management needs of the Gallatin Range.

Grizzly bear biologist Dr. David Mattson, in his latest newsletter, notes that "The Forest Service also treats grizzly bears abysmally, mindlessly reciting errors propagated by the US Fish and Wildlife Service in its overturned rule to delist Yellowstone's grizzlies." Disappointingly, this does say a lot.

At this point in time it should be obvious that the CGNF must use all the best available data from scientists and experts to be able to make an informed decision. It cannot misquote research or cherry pick what suits political decisions. As Dr. Michael Vandeman has pointed out in his extensive literature research, the so-called science

supporting the claim that mountain biking has little impact is often either taken out of context or misquoted or purposely misinterpreted.

The CGNF is not your average piece of public land. Much of it, as noted above, is integral to the biological health of the Yellowstone Ecosystem, and must be treated as such. To make management decisions that compromise the long-term benefits of the biological integrity of the ecosystem is to fail your charge. As climate change and global warming impact the vegetation of the ecosystem - which the vast majority of scientists and the NPS say it will - it is even more important that decision-makers look to what the future is likely to be like in grizzly bear habitat and act accordingly.

Again, I urge the selection of Alternative D as the path forward for management of the CGNF.

Thank you for your time and please include my comments in the official record.

Sincerely,

Richard R. Meis

2 attachments:

MountainJournal-Wilkinson-5-22-19

letter2Congress-GallatinRange-5-19