

Data Submitted (UTC 11): 9/5/2020 6:00:00 AM

First name: Clinton

Last name: Nagel

Organization: Gallatin Wildlife Association

Title: President

Comments: Dear Reviewing Officials:

Please accept the Objections in the attached as well as the references and supporting documentation. If you have questions, don't hesitate to ask. These comments and objections are on behalf of the Gallatin Wildlife Association.

Clinton Nagel

Subject: The following objection pertains to the Custer Gallatin National Forest's decision on Recommended Wilderness and other Land Allocations as stated in the Custer Gallatin National Forest (CGNF) 2020 Final Forest Plan, Publication No. R1-19-07.

Original comments submitted June 3, 2019:

<https://cara.ecosystem-management.org/Public/Letter/1928211?project=50185>

Responsible Official:

Mary Erickson, Forest Supervisor, Custer Gallatin National Forest

Standing:

The Gallatin Wildlife Association (GWA) has long supported the maximum amount of wilderness in the Gallatin Range including the maximum amount known in other geographic areas on the Custer and Gallatin National Forest. We have records as far back as May of 1987 where we supported (what was known at that time as the Conservationist Proposal) 1 205,440 acres of recommended wilderness in the Gallatins. In that document, it was stated:

[ldquo]The Gallatin Range has been a focus of conservation efforts for well over 100 years.[rdquo]

GWA is proud to be part of that historic effort. In most recent times, GWA has been involved in the public forum process concerning the revision of the Custer Gallatin National Forest Plan since Day 1. We've attended

open houses and publicly commented when told to do so over the past several years. We've done so because we have a high level of interest, not in a self-centered approach as what's in it for me, but because of our concern over the future of wildlife and wildlife habitat. During this process, we have become dismayed in what we perceive to be a land-grab by special interest and individuals to get something out of this for them. We are trying to be better than that. Our Objections are sincere. Our previous dates of submission were the following.

March 3, 2018

June 1, 2019

August 13, 2019

October 28, 2019

We will restate what we've previously stated in our premise of Species of Conservation Concern. We understand the rationale the Forest Service extolls that objections need to be substantive. You definitely have that right to qualify, expect and set that criteria. But if you do so, then we as a people, as citizens should also have the right to expect the same in return. Those return comments should contain the utmost scientific and rationale dialogue in response to our opposition. We feel so far, the rational and scientific dialogue has been lacking.

The Gallatin Wildlife Association (GWA) has always supported the alternative that we thought best supported the hope and future for wildlife and their respective habitat. We are not supporting [ldquo]wilderness[rdquo] for the form of wilderness recreation, but wilderness for the protection of wildlife and the lands they inhabit. In case of the Draft Revised Forest Plan, that alternative was Alternative D. Even though Alternative D was not perfect in many regards, overall, it presented the premise that could become effective and workable to achieve that final goal. But it never seemed to get the serious attention or support that it warranted. As a wildlife advocacy organization, we object to what seems to be a lack of determination and scientific consideration given to maintain the biological diversity and ecosystem integrity of the Greater Yellowstone Ecosystem.

Rationale:

Our current objection is multifold. First, we understand the principle of public lands; they are for the people. But people of society obviously have a divergent view as to how we use those lands. Part of that divergent view, however, is based upon the old selfish approach of what's in it for me. That is not why these lands were set aside. That is not why the Forest Service exists today. They were set aside to benefit society as a whole. They were set aside to benefit the greater good of our world, not the wantonness of a few.

We would like to refer (or remind) the Forest Service of the intent as to why these lands exist; where the idea came from. These ideas originated in the Organic Administrative Act of 1897.

[ldquo]The Organic Administration Act of 1897, under which most national forests were established, states: "No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use

and necessities of citizens of the United States[hellip]"

We felt Alternative D met that ideal and original intent that created the establishment of our National Forests lands today. But instead the CGNF created a new Alternative, Alternative F. This is an alternative that falls way short of what we think is necessary to meet the increasing demands and serious threats facing the future. In fact, we think Alternative F is so bad that it will only compound those problems to the point, social and environmental ills will beyond the capability and authority of the Forest Service to mitigate. We hate to say it, but we believe we are at that turning point, an inflection point that will either be a bright light for the future or an agency struggling to manage an ecosystem with diminishing returns.

We Object Because:

We say all these things realizing that the Forest Service must also meet the obligations of the Multiple Use[ndash]Sustained Yield Act (MUSYA) of 1960. In fact, the Forest Service has to meet several laws that have passed and been signed into law since. But Alternative D still met those obligations, those lawful requirements. Alternative D was recognized as the [ldquo]wilderness[rdquo] alternative. It is true that Alternative D had more lands recommended as wilderness than any other alternative presented for consideration. But Wilderness itself is a condition or use contained within MUSYA. In fact, designated wilderness meets more of the uses contained within MUSYA than any other use under the law.

Wilderness provides protection of the resource. In fact, the Wilderness Act of 1964 even describes [ldquo]wilderness[rdquo] as a resource in and of itself. But in addition to that, [ldquo]wilderness[rdquo] helps to ensure the protection of the watershed, water quality, wildlife and their habitat, air quality, wilderness forms of recreation, and the integrity and diversity of the forest biome; all uses mandated under MUSYA. Recently, we[rsquo]ll call it a new science, has come to the public[rsquo]s attention that complete and intact forests also fight climate change by becoming carbon sinks sequestering carbon. This land-use designation of wilderness provides more uses and benefits to society than any other, yet it was never promoted in such a way to the public.

We object to the following reductions in recommended wilderness as stated in the 2020 Final Forest Plan.

* Alternative D recommended slightly more than 711,000 acres across the CGNF. The Proposed Plan, Alternative F, recommends only 125,675 acres. This is a huge loss in overall wilderness; a shortfall of 585,325 acres. Only 18% of what is possible.

* As far as the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (HPBH WSA) itself, only half of the total 155,000 acres of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area, 77,631 acres is being proposed as wilderness. We obviously find this unacceptable and object to how the Forest Service derived these numbers. GWA thinks this is unconscionable not to at least honor the original acreage as determined by Congress in 1977.

* Pryor Mountain Geographic Area: Alternative F proposes only an additional 18,058 acres of wilderness whereas Alternative D proposed 43,861 acres.

* Absaroka-Beartooth Mountain Geographic Area: Alternative F proposes only an additional 802 acres as wilderness whereas Alternative D proposed over slightly 214,000 acres.

* The Crazy Mountains, Bangtail and Bridger Geographic Area: Alternative F only proposed 10,257 acres of wilderness (all in the Crazies) whereas Alternative D proposed 91,889 acres of proposed wilderness (those being in both the Bridger and Crazy Mountain Range). The Bridger Range received no recommendation of wilderness in Alternative F whereas in Alternative D, there was slight over 26,000 acres. This means nearly 66,000 acres was left out of the Crazies in Alternative F.

* But the lack of wilderness recommendation is not the only reason we object to Alternative F. It also has to do with the particular lands that were withdrawn from wilderness determination. The lack of including lands of the Buffalo Horn and Porcupine drainages of the HPBH -WSA is a major shortcoming of Alternative F. These lands are known for their most important wildlife rich habitat in the Gallatin Range.

* There is also the lack of inclusion for the areas of Lionhead and Cowboy Heaven. Lionhead has been previously included 22,000 acres of recommended wilderness in the 1986 Forest Plan. Alternative F has no acres of recommended wilderness in the Lionhead in the 2020 Forest Plan. Why not?

* Then we have the concern with the two Key Linkage areas on the CGNF: the Bridger Key Linkage Area and the Gallatin Key Linkage Area. Through land-use allocations as designed in Alternative F, there are two choke points for wildlife in the Gallatin Range. To the south, there is the choke point created by the land-use designation of the Buffalo Horn Backcountry Area and to the north there is the chokepoint created by two land-use designations, the Hyalite Recreation Emphasis Area and the West Pine Backcountry Area. This latter choke point completely blocks the Gallatin Key Linkage Area off and isolates it from a potential corridor to the north. We say this because both land-use designations: Recreation Emphasis Areas and Backcountry Areas can still potentially allow mechanized use. These land-use allocations still present potential and harmful effects to migrating wildlife prohibiting them from having an unencumbered migratory route to the north. In addition to this, the Bozeman Creek Watershed has a project containing future timber thinning, fuel reduction and road construction overlapping nearly half of the Gallatin Key Linkage Area. These land-use allocations are unacceptable and are contradictory.

* We especially object on the removal of lands designated in the Buffalo Horn Backcountry Area from wilderness as was recorded in the HPBH WSA. These lands are in the Primary Conservation Area for grizzly bears and their removal from potential wilderness designation is unconscionable. To open these lands up to mechanized/motorized use is irresponsible in terms of both safety and protection of this iconic species. These lands are part of the Grizzly Bear Recovery Zone (GBRZ) and should remain managed as such without recreational use fragmentating the habitat.

For a matter of perspective, how far have we fallen as a society. In referencing the 1987 Conservationist Response to Sen. Melcher bill S.2790, look at what was being recommended for wilderness at that time.

Geographic Area:	Then (1987)	Now (Alternative F)
Crazy Mountains:	96,100 acres	10,257 acres
Gallatin Range:	205,440 acres	77,631 acres
Lionhead Area:	30,200 acres	0 acres
AB Wilderness Area:	38,080 acres	802 acres

The point is: there was massive support for these lands as wilderness at that time, but even then, some acreage in the 1980s could have been more than what was recommended. But Alternative F is so far out of the mainstream of what is possible, it is not representing the fullness of wilderness potential of that 33 years ago or today. Alternative F does not represent the historical support at that time and it certainly does not represent what is possible today. The lands which fell under the Wilderness Study Act of 1977 should have remained in the same condition today. It was the Forest Service's responsibility to maintain that wilderness potential. And in addition, is it not the Forest Service's responsibility to advocate for what Congress has already determined to be potential wilderness? That was contingent, of course, upon the fact if the lands met wilderness criteria, which we will learn shortly; they did. So how or why is it that the Forest Service is recommending for less wilderness than what Congress mandated? For this reason, we object. Alternative F does not represent the historical agreement reached among all conservation groups.

For all of these reasons and more, not taking time here, we object to the misplaced priority of catering to mechanized and motorized recreationist over the protection of the resource of wilderness. It surely seems as if the CGNF has given more access to public land for the purposes of recreation than for any other use. By doing so, they have relinquished public lands over to an exploitative purpose of the resource rather than adhering to the mission of resource protection. GWA can make that statement based upon the facts as presented by doing a comparison between the two alternatives.

Alternative D proposed 34,649 acres of Recreation Emphasis Areas whereas Alternative F proposes 224,608 acres. This is even more than the 208, 718 acres proposed in Alternative C.

From this alone, it sure seems as if the Forest Service has favored the voices of those utilizing public lands for personal enjoyment rather than the mission at hand. But GWA wants to be clear, we are not against recreation. We realize that one of the uses listed under MUSYA is to provide recreation to the American people, but those uses have to be commensurate to the overall mission. Just because there is a segment of society who wants to utilize a form of recreation that may be harmful to public lands doesn't mean the Forest Service has to permit it. We want to make clear that we as a society are in a strange time, a formidable time, where the management of public lands need to adjust accordingly.

Perhaps there is a time to change the premise, the paradigm of the Forest Service as they have or should have a new charge. The old traditions of old may or may not be applicable today. The Forest Service needs to seriously analyze that possibility.

Hyalite-Porcupine-Buffalo Horn Wilderness Study Area: In 1977, the Montana Wilderness Study Act (S. 393)³ was passed by the Senate and House and signed into Law on Nov. 1, 1977. These lands were set aside as the law states, the Secretary shall:

[ldquo]within five years after the date of enactment of this Act, review certain lands designated by this section, as to their suitability for preservation as wilderness, and report his findings to the President.[rdquo]

The 1985 Hyalite Porcupine Buffalo Horn Wilderness Study Report⁴ was conducted by the Forest Service for wilderness suitability to make recommendations. The Hyalite-Porcupine Buffalo Horn Wilderness Study Area (HPHB WSA) was not recommended for wilderness primarily because of the fragmentation of land ownership, the checkerboard nature of land ownership with the Burlington Northern Railroad being the primary participant. As that conclusion was drawn, the study still made this statement.

[ldquo]Most of the area is suitable for wilderness consideration. Impacts to the area[rsquo]s natural integrity and appearance tend to be on the area[rsquo]s periphery. Natural appearance of the area will be affected in a few places by sight or sounds from outside the boundaries, but these disturbances would probably affect less than 5 percent of the area.[rdquo]

Since that time, there has been litigation over the Forest Service[rsquo]s ability to maintain the wilderness character of the HPHB WSA and there has been an attempt to transition lands from private and public ownership. In 1993, testimony was given before Congress on behalf of Gallatin Range Consolidation and Protection Act, HR 873, a piece of legislation whose purpose was to consolidate lands adjacent and in the proximity to HPHB WSA. A piece of legislation which GWA was in support of. By 2003, the Forest Service had acquired 37,000 acres of those private lands and transitioned them to public land ownership.

This is brought up now because we find ourselves in the scenario where the Forest Service and special interest groups (of the recreational industry) pushing a recommendation which fundamentally undermines previous legislation. It is stated that the original HPHB WSA did meet the criteria for wilderness designation. Now groups 35 years later signify that those criteria don[rsquo]t matter? Why do special interest groups get to put asunder what research, science and Congress did to piece together? This is not right. This is why we object to Alternative F.

The Science Promoting Wilderness: GWA would like to refer the Forest Service to a report by the Craighead Institute⁵, a report entitled Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area dated November 2015.

[ldquo]We now know that intact, roadless areas of secure habitat are critical for maintaining healthy ecosystems, particularly in the face of our rapidly changing climate. Intact, functioning ecosystems are our best hope for removing carbon dioxide from the atmosphere and sequestering it, and for buffering the impacts of climate change. Page 6

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Intact areas with wilderness characteristics are essential for maintaining the fish and wildlife populations that provide Montanans with a quality of life that has disappeared from most other states. This report summarizes the current state of knowledge of the ecology of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (HPBH WSA) in an effort to provide a solid scientific foundation to determine its [ldquo]suitability for preservation as wilderness[rdquo] as mandated by the Montana Wilderness Study Act.[rdquo]Page 6

[ldquo]The HPBH WSA, along with the NW corner of Yellowstone National Park, to which it is connected physically and ecologically, has long been a refuge for beleaguered wildlife populations.[rdquo] Page 8

Intact ecosystems which are not fragmented by human developments or degraded by human activities are important for many reasons. These include the provision of ecosystems services such as clean air and clean water, climate regulation, soil formation, nutrient cycling, and harvesting of food, fuel, fibers, and pharmaceuticals. Page 8

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Based on the data and information contained in this report, the HPBH WSA can be considered an intact [lsquo]ecosystem[rsquo] or critical component of a larger ecosystem, the GYE, and as such should be protected from further human alteration and disturbance. This protection should be as restrictive of human uses as possible and should be as permanent as possible. Page 8

To ensure that wildlife have sufficient habitat for population persistence into the future, and to confer resilience in the face of climate change and land use change, there must be an adequate amount of protected habitat available among the spectrum of lands that are accessible to those wildlife. The more permanent that protected habitat is, and the larger the area is, the more certainty there is that wildlife populations can persist. Page 9

Fragmenting the HPBH WSA into smaller pieces of protected habitat would greatly diminish its value for wildlife habitat and the provision of ecosystems services, and could nullify its ability to function as a refuge from climate change. Page 9

Here we have several statements stating the importance, the value, the purpose of maintaining wilderness. We subscribe to this line of thought that complete ecosystems have value. The number of near totality or completeness of ecosystems in the lower contiguous United States is so few; they must be appreciated and protected where ever possible. The lessening of the original WSA including those areas of Inventoried Roadless Areas that were contained in Alternative D recommended as wilderness must be restored to their value within the ecosystem.

The Value of Wildlife Habitat: One of our grave concerns in Alternative F is the exclusion of the Buffalo Horn and Porcupine drainages from the original HPBH WSA. According to Lance Craighead's study, Table 2 on page 129 of that report highlights the Qualitative Conservation Values of the HPBH WSA for 7 species: Bighorn Sheep, Mountain Goats, Cutthroat Trout, Grizzly Bear, Wolverine, Elk and Pika. The values for all species listed ranked Medium to Very High. This is why we object to Alternative F. These lands possess a value of habitat (like that seldom seen) across our country, but it is quickly declining. It is this type habitat that gives the HPBH WSA the value that it has. Without these lower elevations, the landscape known as the Gallatin Crest Wilderness, that of Alternative F, basically becomes reality in what was feared and described as a "rock and ice" landscape, a landscape with no habitat value. It is the habitat of these drainages and drainages alike that give the WSA character. The shaded areas in red found in the map below showcase the problem as it pertains to wildlife. The southern area (Porcupine-Buffalo Horn drainages) forms a chokepoint at the southern end of the current HPBH WSA.

Instead of maintaining these lands as recommended wilderness, they've been hijacked to provide more possibilities for recreational mechanized use. Lands which have been analyzed as having "wilderness character" have been taken out of contention or consideration for wilderness to provide mountain bikers more of a recreational playground.

Map 1

The northern end of this map, also highlighted in red, is the Eightmile Creek and East Fork Hyalite Creek drainages. The Qualitative Conservation Values mentioned in the Craighead Report provides the same ranking for those 7 species in the northern sections of the WSA.

But there is another problem here. Here we have lands that have been taken out of consideration for wilderness to be managed as part of the Hyalite Recreational Emphasis Area and as part of the West Pine Backcountry area. On top of that, we have portions of these lands which are part of the Bozeman Municipal Watershed Project. See Map below.

Map 2

Before wildlife can get to the Gallatin Key Linkage Area, an area established for the protection and assurance of

wildlife connectivity, they have to elude man and their recreational machines in the Hyalite Recreational Emphasis Area and the occasional recreationist in the West Pine Backcountry Area. In addition to that, once or if wildlife makes it that far, they have to deal with the potential of half of the Key Linkage Area being part of the Bozeman Creek Watershed, a watershed which is proposed for forest thinning and perhaps road construction. All of this just detracts from the value and importance of wildlife habitat. This is what we call habitat fragmentation and the Forest Service is complicit in accelerating the loss of this valuable real estate for wildlife. We object to the mission not be accomplished.

Another lost point in understanding the value of habitat. Even in the existing world of valued habitat in the HPBH WSA, things are not as they seem. GWA would like to refer the Forest Service to Craighead's same report concerning the impact of trails on wildlife habitat.

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[Idquo]Currently, the only significant human disturbance in the HPBH WSA remains in the form of trails and the activities that those trails permit: camping, hunting, fishing, hiking, climbing, running, horseback riding, mountain biking, ORVs, and ATVs and others.[rdquo] Page 125, 126

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[Idquo]The trail network in the region is fairly dispersed and mostly low impact with more concentrated use near Bozeman, Hyalite reservoir, and Big Sky. There are approximately 200 miles of Forest Service system trails within the HPBH WSA.[rdquo] Page 126

* The disturbance caused by the trail network and activities on those trails reduces the quality of the habitat for wildlife. In other words, all suitable habitat in the WSA is not available for use by wildlife, and the effective habitat is what remains and is what determines the carrying capacity of the area and ultimately the number of each species that can survive and persist there. Page 126

* [Idquo]Although the trails are fairly dispersed, the impact of the trails in the HPBH WSA is not dispersed because of the differing impacts of motorized recreation versus other forms of travel. The distance at which animals are disturbed or displaced depends upon many factors such as the species involved, the terrain, whether or not the animals are currently being hunted, the volume of traffic, the decibel level of the vehicle, the wind direction, and even the individual response of the animal. Distances of the disturbance effects are varied from one wildlife study to another, but follow the same general pattern: hiking and horseback riding cause the least disturbance, followed by mountain biking, followed by motorized travel.[rdquo] Page 127

What this means is that what we think is happening on the WSA; isn't really happening. It means that man is having more impacts on the environment than what we thought. What this is saying, is that even areas deep within the WSA are not utilized as wildlife habitat because of man's intrusion of trails. In fact, as the report states, some of these areas are under utilized by wildlife. This is why we object to removing more lands out of

potential wilderness designation, it just compounds the problem that wildlife is facing now. We are literally making the ecosystem have less biodiversity and less ecological integrity.

Road Densities: In speaking of trails and disturbances, we must discuss the long-term effect that roads and highways have on wildlife for this is the most obvious form of habitat fragmentation. To place things in perspective, in the publication entitled [ldquo]The Status of the Grizzly Bear and Conservation of the Biological Diversity in the Northern Rocky Mountains: A Compendium of Expert Statements[rdquo], there is this statement by Dr. Lee H. Metzgar, PhD⁶.

[ldquo]The spatial needs of a grizzly bear metapopulation exceed 70,000 square miles (185,000 km²) of connected, secure habitat. By contrast, the isolated Grizzly Bear Recovery Areas provide just 38% of spatial needs including the Bitterroot, which does not yet have a population.[rdquo]

And here we have a case, as with Alternative F, that lands (having wilderness potential) are being taken out of that protective status as wilderness in order for them to include mechanized and motorized recreation. Whether it be trails or roadways, the harm to grizzly bears and other species is the same, the only difference as we learned above is the degree of harm. We are saying, that any harm to grizzlies or other species is too great. To get a real picture of road densities in the Gallatin, view the map below provided by the U.S. Geological Survey.

Map 3

This map makes it easy to highlight the boundaries of Yellowstone National Park. That[rsquo]s a scary thought. Everything outside of that boundary is obviously private land or public land administered by the CGNF[rdquo]. This is what grizzlies and wildlife in general have to contend with. This is the reason we object to the CGNF Alternative F. Under this proposed Alternative, this map is going to look worse, not better as roads are constructed for timber harvesting, or thinning, or even a proposed airstrip landing. This is not the kind of management of wildlife we want to see; at some point it becomes destruction of their habitat.

Grizzly Bear Primary Conservation Area: There is a direct relationship between lands designated as wilderness under the Montana Wilderness Study Act of 1977 and those lands that fall within the Grizzly Bear Recovery Zone (GBRZ), also known as the Primary Conservation Area (PCA). The name change resulting in a paradigm shift from recovering the species versus the change to conserving the species. GWA has discussed this in our previous comments, but it is definitely worth discussing here in our objection. We strongly object taking lands from and within the Primary Conservation Area (PCA) out of protective status as recommended wilderness for the purpose of mechanized or motorized recreation. This is not compatible with habitat protection, especially lands within the PCA. These lands should not fall under the auspices of Backcountry Areas. For the definition of Backcountry Areas as stated on page 125 in the 2020 Final Forest Plan is this:

[ldquo]Backcountry areas are generally undeveloped or lightly developed. They are either unroaded, or have few, primitive roads. Some are both unroaded and untrailed. Backcountry areas provide for more remote, semi-primitive recreation opportunities, both motorized and nonmotorized, depending on the area.[rdquo]

Recreation, even motorized recreation, would still be viable on what was once and still is considered wilderness potential lands. GWA contends this flies in the face of the Grizzly Bear PCA intent. On page 63 of the 2020 Final Forest Plan under Standards; Standard 01 states the following:

[ldquo]Inside the recovery zone/primary conservation area, management actions shall not reduce the percent of secure habitat in each bear management subunit below 1998 baseline levels.[rdquo]

Yet right after this statement in Standard 02, there is an exception whereby it states permanent changes can occur as long as there is replacement habitat to take its place. In fact, throughout this section of the 2020 Final Forest Plan, the story is much the same. The CGNF is making exceptions to how they will reduce the percentage if not the efficiency of secure habitat in the PCA. This practice seems to be applied throughout all standards, Standard 1 through Standard 7, and even including Guidelines 1 and 2. All they talk about are defensive measures the CGNF will take in order to preserve habitat because of some aggressive action they[rsquo]re proposing in reducing it. Yet, we know this would just allow for greater habitat fragmentation. Our question is: where are the offensive measures to be taken? What is the CGNF doing to promote and advance the cause of grizzly bears and the PCA? Are these proposed actions in compliance with the Endangered Species Act? Again, it seems as if the plan is out of sync with the FEIS.

Please view the PCA map below. Notice how the Buffalo Horn and the Porcupine drainages are part of the all-important grizzly bear habitat within the PCA. Map 1 highlights that section just northwest of Yellowstone National Park seen here in Map 4. GWA strongly urges that the PCA remain in tact as well as the HPBH WSA.

Finally on this issue, GWA would like to know if the Forest Service has responded to any comments submitted by the public on the issue of grizzly bears or the PCA?

Map 4

Grizzly Bears and Recreation:

As previously stated, the Buffalo Horn and Porcupine drainages were removed from the HPBH WSA in Alternative F and designated as the Buffalo Horn Backcountry Area, an area that still has potential for mechanized and motorized transportation. This should not be so designated in a GBRZ. GWA previously stated safety concerns over the relationship of mountain biking and grizzly bears in our original comments. We want to simply repeat our original thoughts and comments here in a simplified version.

[ldquo]GWA would like to refer CGNF to a letter dated July 11, 2013 from Tim Manley,7 a Grizzly Bear Management Specialist with Montana Fish, Wildlife and Parks, to Chip Weber, the Flathead National Forest Supervisor. GWA urges the CGNF to read the entirety of the letter on your own, but segments from that letter are included below:[rdquo]

[ldquo]As Grizzly Bear Management Specialist for Montana Fish, Wildlife & Parks, I wanted to write you this letter regarding mountain biking in portions of the Whitefish Range.[rdquo]

[ldquo]My concern lies primarily with mountain bikers having serious negative encounters with grizzly bears which could result in serious bodily injury or even death to the mountain bikers[hellip]. [rdquo]

[ldquo]In recent years, technology has created mountain bikes that are able to be ridden on a wide variety of trails and terrain. This has caused an increase in negative encounters between mountain bikers and grizzly bears, often resulting in a very bad situation for the mountain bikers. While there is always the potential for conflicts between recreationists and grizzly bears, mountain bikers provide a unique situation. Mountain bikers typically travel quietly, at fast speeds, with their attention on the immediate trail in front of them, rarely able to scan the trail and surrounding area for bears. This type of activity in prime grizzly bear habitat is a recipe for disaster.[rdquo]

[ldquo]I have discussed the use of mountain bikes with other grizzly bear biologists in Alaska, Alberta, British Columbia, Idaho, Montana, and Wyoming. None of the biologists I spoke with felt that mountain biking in areas with a high number of grizzly bears is a good idea.[rdquo]

[ldquo]To further the discussion and to help reinforce the point, GWA would like to refer the CGNF to the research paper by the Craighead Institute (Craighead Institute, 2015). On page 89 of Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area, it states the following:[rdquo]

[ldquo]Recreational development increases bear mortality risk and alienates bears from preferred habitats such as riparian areas. The effect of developments on mortality extends up to 6 km from the recreational site (Mattson and Knight 1991). Even non-motorized trails may be avoided to a distance of 300 m (Kasworm and Manley 1990, Mace et al. 1996). Mace and Waller (1998) found that in the Jewel Basin hiking area east of Kalispell, Montana, bear use increased with greater distance from trails and lakes with campsites.[rdquo]

This is one reason GWA objects to the actions taken by the Forest Service on opening these lands up to a type of recreation that increases grizzly bear/man conflicts. GWA thought the PCA was supposed to manage bears in a way that should resolve or reduce these types of conflicts.

Science tells us again that we are on the wrong track in our management of grizzly bears. Dr. David Mattson⁸, in a published article: The Status of the Grizzly Bear and Conservation of Biological Diversity in the Northern Rocky Mountains: A Compendium of Expert Statements, lays out 10 steps in how to achieve the goal of recovering grizzly bears in the contiguous United States. Step 6 makes this statement.

[“Enhancement of habitat security needs to be prioritized over resource extraction on public lands.”]

Opening up lands for extraction or exploitation is nearly the same thing; it’s only utilizing a different medium for a different purpose. But let’s not ignore the truth, both are an assault on the resource. Alternative F extracts land, land within the GBRZ no less, for the purpose of recreational enthusiast and personal gratification. In Alternative F, we have an excellent chance and opportunity to use proper science on a reasonably well-endowed existing habitat for the enhancement of grizzly bear recovery and we’re not taking it. Shameful!

One more scientific conclusion from Dr. David Mattson⁹. In his publication entitled [“Effects of Pedestrians on Grizzly Bears: An Evaluation of the Effects of Hikers, Hunters, Photographers, Campers and Watchers”], he says this:

The weight of evidence unambiguously supports concluding that mountain biking is far more hazardous for involved people and more impactful on affected bears compared to any other pedestrian activity with the exception of hunting. Given this perhaps self-evident verdict, it is not surprising that Parks Canada seasonally or permanently closed trails to mountain bikers several years ago in areas where chances of hazardous encounters were high (e.g., the Minnewonka, Mortaine Lake Highline and Bryant Creek trails [MacHutchon 2014])

Governor’s Grizzly Bear Advisory Council: We would like to say one more thing concerning grizzly bears and their ability to reach connectivity to other ecosystems. GWA submitted comments on the Governor’s Grizzly Bear Advocacy Council¹⁰ and we would like to restate some of those guiding principles and recommendations here that are applicable to this issue.

Guiding Principles:

11. Connectivity is important to the long-term sustainability, persistence, and resiliency of grizzly bears.

Connectivity areas will exist in diverse social and environmental settings. Not all of these settings are conducive to permanent habitation, but should be managed to promote genetic and demographic connectivity in biologically suitable and acceptable habitat, being mindful that biologically suitable does not always mean appropriate.

12. The Council recognizes the importance of large tracts of remote secure habitat.

Sustaining and improving habitat security, managing road densities, and identifying and protecting natural food resources and other needs will contribute to long term survival and resiliency of grizzly bears.

15. Grizzly bear conservation is a shared responsibility.

Recommendations:

12.3. MTFWP and relevant agencies should continue to work with partners to research and closely monitor impacts to grizzly bears from road densities and other human activity on public and state lands.

12.4. MTFWP should coordinate with public land managers to develop plans to address the general and seasonal impacts to wildlife from recreational use and to prevent conflicts between grizzly bears and people on the landscape. This should include actionable items, as well as consistent and comprehensive outreach and education;

15. MTFWP and all relevant agencies should clearly define the [ldquo]landscapes in between[rdquo] the four recovery zones in Montana that are important for genetic and demographic connectivity and the long-term sustainability of the grizzly bear.

Notice these principles and recommendations. Even though they are not as strong as they once were, they do signify the recognition of conflicts between recreation and grizzly bears (see recommendations 12.3 and 12.4) do exist. How does the 2020 Forest Plan work in conjunction with these recommendations soon to be signed by the Montana Governor? We believe that some of the actions taken on by the Forest Service in the 2020 Forest Plan comes close to being in conflict by those supported by the Governor[rsquo]s Council (see Guiding Principle 12). Habitat security, how does lessening security on prime habitat for grizzly bears in order to increase surface area for recreationist increase habitat security? We object to the lack of seriousness the Forest Service seems to be providing the management of grizzly bears in the PCA and inventoried roadless areas. Our contention is that not only is the wilderness (HPBH WSA) necessary for the value of connectivity of grizzly bears, but for other wildlife as well such as wolverine, wolves, elk, bison, etc.

The Proposed Solution:

We understand and recognize that GWA's position may not be viewed by others, perhaps even the Forest Service, as a viable option. Some may think it to extreme, but that would only be the case if those particular ones totally ignore the science. The correct solution would be to listen to the science and the conditions on the ground. Perhaps before some do that, they need to ask some questions. What's best for the forest? What's best for the watershed, the wildlife that live there? What are the best sustainable options? What's the best solutions to maintain water quality, to mitigate climate change? It's not about me.

What needs to be rectified is to place the HPBH WSA back together again. We tried to state the rationale for wilderness in general. Wilderness has a purpose greater than just itself. This is why we support increasing wilderness recommendations in the Pryors, Crazies, Bridgers and the Gallatins as well as the Lionhead, Cowboy Heaven and South Cottonwood landscapes. These are valued lands that have a great diverse purpose that reach far beyond recreation.

There also needs to be a rectification of the two Key Linkage Areas: the Gallatin and the Bridgers. Alternative F, as it stands, cuts off and pinches the connectivity potential at the north and south end of the Gallatin Range. The Gallatin Range Key Linkage Area located at the north end of the range, may not be as effective as it should be. Wildlife, if they are lucky enough to get there, will be handicapped by a Recreation Emphasis Area on the west side and a Backcountry Area on the east, a land-use designation still having the potential of mechanized and motorized use. As previously stated, half of that Key Linkage Area incorporates the Bozeman Municipal Watershed, a watershed that already proposes timber thinning and road construction as part of a fuel reduction project. This conflict of land uses needs to be resolved. The original HPBH WSA allowed more direct access for wildlife to reach the proposed Key Linkage Area.

The other key linkage area is on the west slope of the Bridgers, the corridor link to the north from the Gallatin Range. The Bridger landscape is very popular for recreationist on both sides of the Bridger Crest, mechanical and motorized. On top of that, the east side of the Bridgers is designated as a Wildland Urban Interface (WUI) meaning there is very little room for wildlife. Unfortunately, this corridor is necessary in order to maintain connectivity to the north. There has to be some land-use designations that will preserve the corridor and to protect it from negative-ills from man-made intrusions. In other words, the Bridger Key Linkage Area needs help from some other land-use designation, either that or define a Key Linkage Area with [Idquo]more teeth[rddquo].

There also needs to be some rethinking about the management of lands which fall within the GBRZ. The GBRZ needs to have some influence as to how other lands are managed or how they are allocated with land-use designations. They should be managed in a way as not to interfere with the bear's ability to reach connectivity and/or exist on a natural landscape. This means that the HPBH WSA should remain intact. This means that some inventoried roadless areas that were recommended in Alternative D as wilderness should also be restored as wilderness. [Idquo]Wilderness[rddquo] provides the ultimate protection. The GBRZ should not be managed as to increase habitat fragmentation.

Finally, there needs to be a more and better working relationship for the management of wildlife. Hopefully that

would mean a relationship that benefits wildlife as well. We say that knowingly that the Governor's Grizzly Bear Advocacy Council will recommend the maintaining of WSAs as WSAs. There is a larger purpose here than just recreation. Lands that meet wilderness criteria should be designated as wilderness. That is the best use of public land for the greater purpose.

The link between Objection and prior Formal Comments:

GWA's original former comments match and support our comments made here during our Objection. We continuously believe that wilderness is the best and even the cheapest land-use management policy to implement. We believe that because it restores and sustains the resource. It serves to maintain the integrity and biodiversity of the resource. It protects and maintains the watershed, the wildlife habitat, the water quality and makes the totality of the ecosystem a greater force to mitigate climate change.

Much of the science in support of what we presented during our opening and original comments apply here, but due to brevity and time, all won't be presented at this time. But we feel we presented enough to prove our believe that wilderness has value for the greater Yellowstone Ecosystem. During this review process, we urge that the Forest Service look at the full totality of our comments.