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Comments: My background is and Environmental engineer that recreates on public lands. Recreational activities include mechanized access (both motorized and bike), horses, and short hikes. I am also 68 years old with age and time related issues that limit my access into public lands that involve long hikes. I am Objecting to the "new forest plan" on the following basis: 1. Wildlife management, Lack of presence analysis. 2. Flaws in the fundamental processes, meetings I attended appeared to be hosted by GYC, Wildlife Federation, and other special interests. 3. Handicap and physically challenged access to public lands. Appears to be no allowance for this group in the plan. 4. Increasing access to National Forests. It appears that more access is being taken away based on a majority of comments. No where can I find the USDA is protecting minority rights. 1) Wildlife management. The perception is motorized travel has the greatest effect on wild life, yet international studies demonstrate the greatest effect is the amount of time the disturbance is present around wildlife. Hiking has the longest and mechanized uses have the shortest presence. For demonstration, on a recent motorcycle ride in Porcupine Basin to Rams Horn Lake we came upon 2 Moose that looked and kept grazing due to the shortness of our being present. There were four of us on bikes. I disagree with the proposed actions regarding shorted seasonal use and trail closures based on motorized use effects of wildlife when the greatest effect is hikers. There is a lack of real evidence that mountain bikes and motorized use are causing more impacts to wildlife on the forest than any other user group. A growing body of evidence appears to indicate the opposite may be true for mechanized and non-motorized users. A 2016 study entitled; "Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review" found that "increasing numbers of studies are discovering negative effects of recreation on animals." This study conducted a systematic review of the scientific literature and analyzed 274 articles on the effects of non-consumptive recreation on animals, across all geographic areas, taxonomic groups, and recreation activities. Montezuma County objected to trail closures based on this study as follows: "And counter to the widespread public opinion, the study "found that non-motorized activities had more evidence for negative effects than motorized activities. Motorized activities are often expected to be more harmful to animals because of vehicle speed and noise [43], but our results suggest the opposite across a wide range of study locations and taxa. A few articles directly compared motorized and non-motorized activities; four mammals (guanaco *Lama guanicoe*, wolverine *Gulo gulo*, coyote *Canis latrans*, and bobcat *Lynx rufus*) showed behavioral or occurrence responses to non-motorized but not to motorized recreation." And; "Although motorized and non-motorized activities had similar evidence for overall effects {{57.0 [plusmn] 5.1% and 58.4 [plusmn] 2.5%}, non-motorized had greater negative effects {{40.3 [plusmn] 4.0% versus 34.0 [plusmn] 8.6%}. Activities with the most evidence of overall effects included each of the snow activities (cross-country ski/snowshoeing: 81.0 [plusmn] 8.6%, motorized-snow: 77.8 [plusmn] 13.9%, alpine skiing: 71.0 [plusmn] 8.2%), as well as boat-based wildlife viewing {{65.4 [plusmn] 5.4%} and beach use (64.8 [plusmn] 8.2%)." The Draft EA states, "Elk habitat within the analysis area is associated with general winter range on the southern portion of the project and is mainly used as seasonal transition range during migration. There are no mapped critical winter range portions areas mapped with the project area. However, Colorado Parks and Wildlife and other stakeholders expressed concern about the impacts of recreation on elk due to the realignment proposed for the Lower Ryman Creek Trail. For this reason, a seasonal closure is included as part of Alternative 3." However, Colorado Parks and Wildlife (CPW) also state, "The reason for the decline of the herd in E-24 is unknown." Therefore the proposed seasonal closure amounts to a "Hail Mary" in regards to elk production. We have no direct evidence that a seasonal closure on the Ryman Creek trail will have any positive effect on wildlife in general, and specifically for elk production. During a good snow year, elk would rarely be up at that elevation until the end of June following snowmelt. Seasonal closure of the Ryman Creek Trail to one user group is not a favor to wildlife; it only favors one user group over another. This decision seems to reflect the desire to quiet the non-motorized users' perpetual chorus rather than make significant improvements to wildlife habitat. The USFS has already decided that eliminating mountain bike use on the trail was not an option, as the ID team "did not identify this option as providing a measurable improvement to wildlife habitat over the

proposed action due to current low use and a limited projected increase of use." Indeed closing the trail to mountain bikes for a month and a half is not going to have a measurable effect in the improvement of wildlife habitat. The only result will be to deny recreational access to a specific user group based on the perception that mountain bikes carry a more significant impact on big game, while hikers and equestrian users have a lesser effect. If protecting wildlife habitat is indeed the goal, then based on the evidence that all recreation has a negative impact on wildlife, and statistically that non-motorized recreation appears to have a greater effect, then it should be closed to all users for that month and a half. The study is attached to my objection and can be found at the following site: <https://journal.slos.org/publications/article?id=10.1371/journal.slos.0167259> My observations when riding supports the findings in this study. Riding Taylor's fork and other trails in the area have not changed the wildlife patterns. The trails are covered with bear, elk, wolf tracks and poop every year. We have come upon bears, elk, and wolf packs when riding. The perception is we will never see any wildlife which is further from the truth. Two years ago in Buck Creek a small bear cub crossed IO' in front of one of our riders. I'm sure that mom crossed the trail ahead of us, the cub held until the lead rider passed, then crossed behind the lead rider to catch up to mom. I would speculate that had we been hiking there would have been an encounter with mom due to the length of time we would have been present. The forest plan as proposed has to consider non-motorized vs mechanized use in an objective study and not perception based.

2) Flaws in the fundamental processes: Planning events and Forest Service Plan open houses appear to be run by GYC and other Conservation Groups. Examples area: A panel discussion at Bozeman Public Library that was facilitated by the USFS. At this meeting the Conservation Groups were there with cookies, punch, and other treats as well as handouts on certain positions. While motorized use was there and represented, we generally were not allowed to speak, generally ran by a majority group. USFS meeting at the Bozeman Holiday Inn was a work session with break out groups. The breakout groups were led by Conservation People. I think we had one Mountain Biker that led a group who was very frustrated with being a minority interest. USFS sponsored a presentation at the Gallatin County Fairgrounds to start the USFS planning Process. The room was very polarized in that the hikers/environmental groups were on one side of the room, mountain bikers in the middle, and motorized on the other side. The presentation seemed biased towards the majority that were present. These meetings were to gather information for developing a forest plan. The flaw is that much of the information and testimony gathered was biased to support certain positions to close large portions of the forest to mechanized users. Testimony from mechanized users appeared to be used against those uses in developing the current plan. This process makes it hard for me to trust some USFS officials to be unbiased in their decisions.

3) Handicap and physically challenged access to public lands. The Draft Record of Decision on page 1 states "the Custer Gallatin National Forest has a history of multiple co-existing uses, including recreation", yet the Custer Gallatin National Forest Draft Plan focuses on segregating uses to in their words, "avoid user conflict. In my time of recreating in the Custer Gallatin National Forest I can honestly say conflict between users is very rare, if ever. People wishing to enjoy our area of public lands are inspired by the unique landscape and appreciate others they meet and share their experiences. In my mind the Forest Service should not be making decisions based on prejudice, discrimination, intolerance, and bias but this is what has been included in the plan. The Forest Plan decisions on appropriate recreation activity is not being based on science but rather an arbitrary land allocation based on an assumed condition. I request the Forest Service revisit this decision and adjust these land allocations more fairly based on their statement of having "a history of multiple coexisting recreation uses." AND When I search the Draft 2020 Land Management Plan for handicap and physically challenged there are no provisions for these user groups. Most of the plan centers around the "hyper" physically fit which is perceived the majority. The USFS plan needs to protect the minority users and their constitutional right to use public lands.

4) Increasing access to National Forests. Over time I have motorized use trails close, seasonal restrictions, or be eliminated based on a USFS officials' opinions. I fully support the following Citizens for Balanced Use and access should be increased for all: The Custer Gallatin Forest Plan proposes to close additional access to multiple use recreation. This action is contradictory to the new June 12, 2020 directive from the Chief of the Forest Service. The Secretarial Memorandum which states the purpose of this directive is to "Establish vision, priorities, and direction: "[bullet] Increasing the productivity of National Forests and Grasslands [bullet] Valuing our Nation's grazing heritage and the National Grasslands [bullet] Increasing Access to our National Forests [bullet] Expediting environmental reviews to support active management According to the Forest Service and their NVUM survey less than 3% of the public recreate in

wilderness areas yet more than 1/3 of the Custer Gallatin National Forest is designated wilderness and closed to all motorized and mechanized use. Nearly another million acres is designated as roadless and has additional restrictions on motorized and mechanized use. All in all, 2/3 of the Custer Gallatin National Forest restricts multiple use recreation of both motorized and mechanized use. The 2004 Travel Plan closed nearly 50% of the trails once open to motorized use. Closure after closure in the past 20 years has caused more crowding on the remaining open roads and trails. There has never been a planning action where the Forest Service increases areas of access for motorized recreation. Most of the public desires motorized and mechanized use. These uses provide public land access opportunities for the elderly, disabled, handicapped, and physically challenged. Access to our public lands provide more than just recreation value, they provide a sense of mental wellness. Sharing outdoor experiences with families of multiple generations is an important aspect of many people's lives. Closing more access to these families and different age groups is unacceptable. Motorized use is the fastest growing outdoor recreation activity in the nation and Montana but the Custer Gallatin has ignored this activity along with the new directive from the Forest Service Chief. The Custer Gallatin National Forest Supervisor is proposing an additional 125,000 acres of wilderness that will remove all motorized and mechanized use in these areas as soon as possible. Why is Supervisor Erickson being allowed to deviate from a national directive from her boss? Public needs of more multiple use recreation are real. This forest is failing to provide for those needs. The Forest Plan failed to provide an alternate that would increase motorized and mechanized recreational access to the Custer Gallatin National Forest. Comments were submitted to the Forest Service requesting an alternative that increased access for both motorized and mechanized use. This is a clear violation of NEPA in not providing a wide range of alternatives for the public to comment on. I object to the decision to reduce motorized and mechanized use areas, the lack of an alternative that increases motorized and mechanized access, and the fact the Custer Gallatin Forest Supervisor's decision does not follow the new June 12, 2020 directive from Forest Chief Christiansen. I request the decision be remanded and a new alternative be developed that follows the Chief's directive to increase productivity, increase grazing opportunities, and increase access. For the past 20 years observed more and more access rights taken away. From 2016 to 2020 it seems to be reaching a point of anarchy. There are more mechanized users than ever that want access to our lands. I request the new proposed Custer Gallatin Forest Plan be remanded and a new plan be developed that addresses the needs of those in need of motorized and mechanized transport in order to access their public lands.