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First name: Bill

Last name: Bryce

Organization: Park Co. Rod and Gun Club

Title: President

Comments: Mary Erickson, Forest Supervisor5 December 2022

Custer Gallatin National Forest

10 E. Babcock Ave.

Bozeman, MT 59771

RE: Recommend Alternative A 'No Action'

Dear Mary Erickson,

The Park County Rod and Gun Club is a local community-based organization with long term goals of protecting wildlife habitat, protecting subsistence hunting, enhancing shooting sports, and protecting public access to public lands and waters. Our club currently has over 1,500 members primarily residing in Park, Gallatin and Sweetgrass counties. The interests of our members are diverse, yet as a resolving core value, we focus on the important roles that hunters and fishers have in maintaining and enhancing wildlife habitats and the fair and equitable access to those habitats by sportsmen and women.

The Park Co. Rod and Gun Club began to publicly engaged with the Forest Service/Crazy Mountains in 2018. Our club submitted a letter in opposition to the relocation of the Porcupine-Lowline trail and indicated that building a new trail, through what was then remote trailless habitat, would have a negative impact on wildlife and hunter opportunity. Our concern focused on how trails cause habitat compression resulting in wildlife displacement from public to private lands. Our letter was supported by sound scientific data, some of which was generated by the Forest Service research program. We have attached that letter below because we echo those same concerns with the current East Crazy Inspiration Divide Preliminary Environmental Assessment (EA) in that building 22 miles of additional and unnecessary trails in the Crazy Mountains will have the same negative effects on the eastside that it already has had on the westside of the mountain range.

We are also opposed to trading low-lying (including wetlands) for higher elevation lands based on the disproportionate production values. In terms of food production, whether that be wildlife or cattle, the low-lying Forest Service lands that will be transferred into private holdings have a substantially higher forage base than the higher elevation lands primarily inhabited by limber pine, mountain goats and pica. On the surface, it appears the public is benefiting because 6,340 acres of private land will be transferred into the public sector while only 4,135 acres of public land will be transferred into private holdings. If the Forest Service presented the land swap in terms of production value (animal unit months of forage), it would more accurately reflect that the public is giving up much more than it is gaining. We understand the recreational value that hikers and bikers place on the high elevation lands because sportsmen and women are, in the off season, the original hiking cohort but we need to point out that the format is quite deceiving and should be better addressed by the Forest Service and more transparent during this public process. We do support protecting the higher elevations private lands but by the FS purchasing those lands not through an unbalanced trade wrongly justified by an inadequate EA.

Lastly, we are disappointed in the Forest Service for making this EA an all or nothing choice with added complexity added with the Inspiration Divide land trade. Typically, as was the case for the southside Crazy Mountain land exchange, there are several options for the public to choose. This all or nothing strategy is hardly representative of the issue's complexity and it short-sides the public process and the valued public input regarding how public lands should be managed.

In summary, we appreciate the efforts of the forest service to solve the complex issue of checkerboard patterns of public and private land ownership in the Crazy Mountains; however, the eastside proposal and EA do not go

far enough to protect the public's interests. Rather, and unfortunately, it erodes the public trust and our club will not support this effort as written.

Best regards,

The Park County Rod and Gun Club

Bill Bryce (President), Paul Dowell (Vice President), Erica Stone (Secretary), Hayes Goosey (Treasurer), Phil Tuccillo (Director), Joey Bauman (Director), Lou Goosey (Director)

Enclosed: 2018 Park Co. Rod and Gun Club Letter is inserted below...

24 March 2018

Mary Erickson, Forest Supervisor

Custer Gallatin National Forest

10 E. Babcock Ave.

Bozeman, MT 59771

Dear Mary Erickson,

The Park Co. Rod and Gun Club is a wildlife, shooting sport, and public access advocacy organization with over 1,000 members in Park, Sweetgrass, and Gallatin Counties. The club is arguably the oldest Rod and Gun in Montana and this is reflected in the diversity of our membership. The club Board of Directors (BOD), strives to represent and reflect the values and recreational choices of our community, one of which is public access to public lands so that the people may enjoy activities like subsistence hunting and gathering, hiking, and camping. The Crazy Mountains have, in recent months, been the National focus of the public access to public lands issue and we appreciate the opportunity to comment on relocating the Porcupine-Lowline trail.

Our BOD are staunch supporters of private property rights; however, we equally support the right of the people to access and recreating on public lands. We appreciate the efforts to date in finding a collaborative solution with the Landowner regarding the Porcupine-Lowline trail (#267); however, because of the ambiguity and lack of formal communication from your office to the people, we are not supportive of this proposal and ask for clarification on the following concerns and questions.

1. Based on recent research, it is scientifically recognized that wildlife security on public lands will be negatively impacted with the trail relocation. Regardless of the user group, trails create 'habitat compression' causing avoidance by elk to human recreational areas (Wisdom et al. 2018) and other ungulates (Stankovich 2008) up to 1 mile and beyond. Many of our members hunt for subsistence in the exact area slated for the trail relocation. How is the United States Forest Service (USFS) scientifically evaluating the habitat compression issue and the downstream effect this will have on the individual ability to secure food and fiber for family use?

2. Visually inspection of the map presented by USFS representative Chad Benson (January 31st, 2018 meeting held at the public library Livingston, MT), it appears the location of the proposed trail will range between 0.1 to 0.5 miles from private property. The evidence presented in #1 concludes that elk and other ungulates will move down country off USFS land and onto private lands. This will further increase the issues of public wildlife on private lands which are managed 'for profit' typically as cow-calf operations. How is the forest service scientifically addressing the economic impacts the trail relocation will have on adjacent landowners?

3. As we understand, the relocated trail will not be open to motorized use. Many of our members are motorized users who will lose use to trail #267. This is the last trail in the Crazy Mountains that is open to motorized use. How will this user group's concerns be addressed?

4. Trail use by ungulate predators allows for easier movement in and out of wildlife secure zones. The new trail potentially changes the rate of predation and behavioral responses by ungulate prey (Lima and Dill 1990). How is the USFS scientifically addressing changes in predation rates and the influence this has on both ungulate distributions and cow/calf, doe/fawn, and nanny/kid ratios?

5. If ultimately the trail is relocated, will the existing Porcupine-Lowline trail be re-opened to public use during construction of the new trail or will the USFS relinquish rights to trail #267 prior to completion of the new trail?

Again, thank you for the opportunity to comment. We would ask that the USFS begin holding meetings open to the public on this issue so that all can be kept informed as to the process and the steps being taken to resolve public and private concerns.

Best regards,

Joey Bauman, President
Park Co. Rod and Gun Club

References

- Lima, S.L. and L.M. Dill. 1990. Behavioral decisions made under the risk of predation: a review and prospectus. *Can. J. Zool.* 68: 61-640.
- Stankowich, T. 2008. Ungulate flight responses to human disturbances: a review and meta-analysis. *Biol. Cons.* 141: 2159-2173.
- Wisdom, M.J., H.K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, and M.M. Rowland. 2018. Elk response to trail-based recreation on public forests. *Forest Ecology and Management.* 411: 223-233.