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Comments: South Cottonwood Project-Comments

Custer Gallatin National Forest

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Please accept my comments on the South Cottonwood Project.

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My comments are on the South Cottonwood project are not just on this project, but the Forest Service's commitment to protecting the Greater Yellowstone Ecosystem in Montana.

The Gallatin Range: Key To Protecting the Gallatin Yellowstone Ecosystem

The Custer Gallatin National Forest is one of the wildest and most spectacular national forest in the country

Above is the final plan map that designates land areas. This map diminishes the Hyalite Porcupine Wilderness Study Area by approximately half. The HPBH WSA has been changed into Recreation Emphasis Areas and Backcountry Areas, which have much less protective land use designations than WSA protections. The Forest Service's final decision leaves basically the crest area of the Gallatin Range as a protected area. I will later cite our evidence why that is not enough.

This configuration does not support the wildlife of the range. Gallatin Wildlife put a camera at Windy Pass and left it there through the fall, winter and spring. The camera recorded no wildlife used the crest area. Wildlife needs the lower grounds, like Porcupine, Buffalo Horn and the front range of the Gallatin Range down to the Gallatin Valley. The data is in this submission.

The importance of the Gallatin Range has been studied:

In 2002, A Mu/ticriteria Assessment of the lrrep/aceabi/ity and Vulnerability of Sites in the Greater Yellowstone Ecosystem R. Noss and G. Wuerthner

That study showed how important the Range is;

* Upper Gallatin Drainage emerged as one of the most important biological hot spots in the GYE and one of the most endangered.
* Identified unprotected sites within the GYE that are biologically irreplaceable and vulnerable to degradation
* 43 mega sites were identified based on 9 criteria corresponding to quantitative conservation goals
* Expert opinion supplemented quantitative data
* Some of the conclusions that were made
* biodiversity in the region is threatened
* resource extraction and population growth are the greatest threats
* The Gallatin Range is one of the best wildlife habitats in Montana. Elk migration route and critical grizzly habitat plus bighorn sheep, moose, wolves, deer, and numerous other species.
* today the HPBH WSA and other connecting Inventoried Roadless Areas are the southernmost area in North America that still contains a full suite of native carnivores, along with other wilderness qualities
* quadrant 1 mega sites should receive the highest level of protection
* Tier lareas in Montana Gallatin Range, Bear Creek

The Study showed the problems that the Gallatin Range faced, and that protection was needed, but as the final Forest Service land use map showed, nothing was done to save it. On the contrary, more extraction and lack of planning exacerbated protection ofthe Gallatin Range.

The maps show the past and projected uses, that have happened in the past four years to an incredibly important area to wildlife.

* Mosher Ridge with skyline logging
* Bozeman Creek
* Mosher Ridge above Kirk Hill
* Kirk Hill
* Thinning Leverich Gulch

tn other actions, there was logging in the Bear Creek area north of Storm Castle, with many roads open to motorized use as you can see in the forest service map.

Here is a photo I took of the front of the Gallatin Range with the Gallatin Valley in the foreground.

This area needs no more logging, and to log almost 70% of South Cottonwood will change the area forever for huma\l foot traffic.and wildlife. It will negatjvely impact wildlife movement fr_om the Gallatin Range to the Madison Range.

THE CUSTER GALLATIN NATIONAL FOREST (CGNF), an integral part of the Greater Yellowstone Ecosystem, is home to some of the best wildlife habitat in the world. It's home to grizzly bear, lynx, wolf, elk, moose, mountain goat, wolverine, bighorn sheep, and native cutthroat trout .

. GWA be_lieves t~at on ~GNF lands, w_ildlife habitat and wildlife co11nectiyity is of cri~cal importance. The GYE in Montana is threatened.

One area that examples this is the Hyalite Porcupine Buffalo Horn Wilderness Study Area, HPBH WSA,in the Gallatin Range that goes from Yellowstone National Park 40 miles north to near

Bozeman. This area was set aside by the U.S. Congress . and in 1977 the Montana Wilderness Study-Act was passed and 155,000 acres of intact, roadless areas were designated and to be managed as wilderness.

It is known that secure habitat is critical for maintaining healthy ecosystems for wildlife., and are essential for maintaining the fish and wildlife populations that provide Montanans with a quality of life that has disappeared from most other states.

Wildlife populations have survived-in the protected space of the WSA

Grizzly bears were probably extirpated from the HPBH WSA by 1975 when they were listed as Threatened under the Endangered Species Act. They have since increased in numbers and expanded in distribution so that grizzlies are considered to occupy almost all of the HPBH WSA which is considered primary grizzly bear habitat by the lnteragency Grizzly Bear Study Team.

Another threatened species, the Canada Lynx, has the Gallatin Range listed as its' critical habitat

Wolverines, a listed species, have probably used the HPBH WSA continuously. All of the HPBH WSA and connected inventories roadless areas are considered either primary or maternal wolverine habitat and it is critical for connectivity

Wildlife needs to be able to move

The importance to. wildlife of connecting the-Gallatin Range_ and other ranges iry Montana cannot be overstated. The time is now because Montana still has available important areas of connectivity for wildlife. These connectivity corridors are known, they have been

If the Custer Gallatin Forest does not protect wildlife. Wildlife will lose the refuge and will lose wildlife movement corridors

Disturbance due to humar:i activities reduces the amount of habitat available for use by wildlife, increases stress, and depletes energy reserves, thus reducing the carrying capacity of the habitat: the best habitat for wildlife is found in areas with the least human disturbance.

A Montana State University study states the challenges that we face.

In a summary announcing the publication of the analysis in EcoSphere, Dr. Andy Hansen,

professor of ecology at Montana State University in Bozeman and colleague Linda Phillips write, "Greater Yellowstone's ecological health is challenged by growing use by people and changing climate. The human population has doubled, and housing density has tripled in Greater Yellowstone since 1970 and both are projected to double again by 2050. Human development now covers 31 percent of the ecosystem. Temperature has warmed 1.5 degrees F since 1950 and is projected to increase 4.5 to 9.4 degrees F by 2100."

Gallatin Wildlife placed a camera on Windy Pass.

* Gallatin Wildlife placed the camera in the Windy Pass area on 9/5/2020. GWA collected the camera on 7/20/2021. Roughly 1000 pictures were taken. Our goal was to see what wildlife utilized the area which is 8600ft. GWA viewed all of the shots and made the following monthly wildlife count.

* September 2 deer,

* October O wildlife,

* November O wildlife,

* December 0,

* January 0,

* February 0,

* March 31-a fox,

* April - fox,

* May- fox,

* June July 1-io 2 deer, 1 Fox , 2 bear cubs, 1 wolverine, 1 moose with calf, 11 elk 22 deer, 7 elk.

GWA concluded that many species of wildlife do not use high elevation habitat for year round habitation.

N_ow, .more th,l'.I ever, intact ecosystems need to be made_ permanent and this

includes South Cottonwood

* Intact ecosystems which are not fragmented by human developments or degraded by human activities are important for many reasons. HPBH WSA is now considered an intact ecosystem or critical component of a larger ecosystem, the GYE, and as such should be pr:otected from further human alteration and disturbance.

* There must be an adequate amount of protected and connected habitat available that are accessible to wildlife. The more permanent that protected habitat is, and the larger the area is, the more certainty there is that wildlife populations can persist. Fragmenting the HPBH WSA and other Forest Service lands of importance to wildlife 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.

Wildlife studies have been done that show

* An area south of Gallatin Gateway by the mouth of the Gallatin Canyon is an important wildlife crossing.area and logging 70% of. South.Cottonwood w!II impact.wi.ldlife

* An overpass study was done that showed this will area is one of the few areas with public lands on both sides of Hwy 191. A conclusion by many experts say that not just an over or under pass is need, but also protected areas on both sides.

* The [middot]study also showed. the increased traffic volume whicA is an. impediment .for wildli_fe.

The Custer Gallatin Forest needs to take seriously the responsibilities of

protection

THE CUSTER GALLATIN NATIONAL FOREST (CGNF), an integral part of the Greater Yellowstone Ecosystem, is home to some of the best wildlife habitat in the world. It's home to grizzly bear, lynx, wolf, elk, moose, mountain goat, wolverine, bighorn sheep, and native cutthroat trout.

GWA believes that on CGNF lands, wildlife habitat and wildlife connectivity is of critical importance. The GYE in Montana is threatened.

One area that examples this is the Hyalite Porcupine Buffalo Horn Wilderness Study Area, HPBH WSA, in the Gallatin Range that goes from Yellowstone National Park 40 miles north to near Bozeman. This area was set aside by the U.S. Congress. and in 1977 the Montana Wilderness Study Act was passed and 155,000 acres of intact, roadless areas were designated and to be managed as wilderness.

It is known that secure habitat is critical for maintaining healthy ecosystems for wildlife., and are essential for maintaining the fish and wildlife populations that provide Montanans with a quality of life that has disappeared from most other states.

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South Cottonwood is an important area to save for wildlife.

Climate Change

Recent Climate Change Assessments have concluded that the GYE and Gallatin NF will experience continued warming temperatures, decreasing springtime snowpack, and decreasing late season soil moisture. The climate will probably become hotter and drier at lower elevations and hotter with similar precipitation at higher elevations. Compared to other areas in Montana and the Gallatin NF, the HPBH WSA will become critically important as a refuge from climate change in the future.

Disturbance Effects

Gallatin Yellowstone Wilderness put up wildlife cameras that showed almost no wildlife use in areas that are not protected.

Disturbance due to human activities reduces the amount of habitat available for use by wildlife, increases stress, and depletes energy reserves, thus reducing the carrying capacity of the habitat: the best habitat for wildlife is found in areas with the least human disturbance.

Now, more than ever, intact ecosystems need to be made permanent

* Intact ecosystems which are not fragmented by human developments or degraded by human activities are important for many reasons. HPBH WSA is now considered an intact ecosystem or critical component of a larger ecosystem, the GYE, and as such should be protected from further human alteration and disturbance

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SENSITIVE LANDS

PROTECTION PLAN

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I believe that the people of Montana have spoken. The 2023

Colorado Poll has been done for 13 years, and has consistent

* Westerners prioritize conservation of the land, water, wildlife,

and their ability to enjoy the outdoors."

* 93% of the people say it is important to protect habitat and

migration routes

* 91% say to help threatened wildlife

* 85% of Montana voters say the loss of wildlife habitat is an

extremely or very serious problem

* 93% of Montana voters say conserving wildlife habitat and

migration routes is an important conservation effort.

* 86% of Montana voters say constructing wildlife crossing across

highways has majority support

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