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For the Madison, Henrys Lake, and Gallatin Mountains Alternative D best meets the Forest Plan objectives as stated in the DEIS executive summary. Of all the alternatives, D comes closest to adhering to the principles of multiple use cited in 36 CFR 219.1b (16 U.S. Code §528 - 531). These principles emphasize maintenance of the ecological productivity of the land in perpetuity over resource extraction and other uses as these excerpts from the law show.

* "[T]he Forest Service manages the NFS to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and [ecological] productivity of the land."

* National forests "shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes."

* Surface resources of national forests are managed "for multiple use and sustained yield of the several products and services obtained therefrom. In the administration of the national forests due consideration shall be given to the relative values of the various resources in particular areas. The establishment and maintenance of areas of wilderness are consistent with ..this title."

The reason alternative D does these things is because it emphasizes protection of lands with high wilderness character as recommended wilderness.

The most pressing issues facing forest planning now are the rapidly changing demographics of the Greater Yellowstone area, global warming and associated climate changes, and the major reduction in checker boarding that plagued the last Gallatin National Forest plan and is only a minor issue in the current plan.

As noted above, recreation is just one "use" of the forest out of many. It has received undo preference in management of this area over the past few decades. A large rapidly growing population of aggressive recreationists is threatening the ecological values of the forest and creating increasing instances of human conflict. Due to the presence of large swaths of wilderness quality lands (a gift many forests can only wish for), an abundance of a large variety of wildlife, and connection to the largely unspoiled lands of Yellowstone National Park, management preference should be given to maintaining these characteristics over recreational access. To this end it is unrealistic to try to "retain all existing permitted activities and facilities" and allow aircraft landing strips. The latter have no place in national forests as they disturb wildlife and humans, pollute air and water, increase fire risk, and contribute to greenhouse gas levels. There is also no mandate to provide opportunities for all types of forest travel that users demand. Some uses are unsuitable in national forests.

A hotter climate and increasingly violent weather events should be radically changing the ways national forest managers approach levels of timber harvest and timber production. The plan needs to recognize that forests are not regrowing making current and increasing levels of harvest unsustainable.² Also, forest management does not reduce wildfire risk and may increase it. Protected forests such as those in wilderness areas burn with less severity than "managed" forests.^{1,3} The Bacon Rind fire of 2018 is a good example of this. It should also be noted that it burned trees growing back from the Rathbone fire of 2003.

Benefits of Recommended Wilderness managed as Wilderness as compared to non-wilderness to local communities and Custer Gallatin National Forest managers

- * Clean, abundant water, especially in the Bozeman City watershed
- * Less severe wildfires than without wilderness; reduced threat of fires in the wildland-urban interface
- * Less people management; fewer human conflicts and instances of illegal travel and vandalism
- * Less pressure on wildlife by conserving habitat, security, and migration corridors
- * More solitude and natural, challenging experiences for people

There are no drawbacks to recommended wilderness as far as forest planning and multiple use principles are concerned. Mechanized travel is permitted and emphasized across sufficient areas and miles of trail to meet the needs of the relatively small number of users.

Strong points of Alternative D

- * The headwaters of Hyalite Creek are protected. The scenic quality of the main and east fork canyons is extremely high. In any other place, they would be protected in a national park. These canyons are unique features in the whole Gallatin Range all the way south to the Madison River. Their riparian areas are vital to wildlife and bird life that are disturbed and driven away by too much human activity.
- * The Lionhead Recommend Wilderness is not bisected but maintained as whole.
- * South Cottonwood Canyon is included in recommended wilderness.
- * Corrects past management errors that did not protect the wilderness character of HPBH WSA.
- * Provides a rationale for finalizing the travel plan decision regarding wilderness character in the WSA and the interim travel rules there.

Suggested Improvements to Alternative D

- * The Cabin Creek Wildlife Management Area qualifies as wilderness and should be classified as recommended wilderness except for the narrow corridor of the Big Sky Snowmobile Trail. The law creating it specifically prohibited motorized travel except for snowmobiles.
- * Some boundaries between recommended wilderness and non-wilderness need to be changed to conform to topography as, for example, the boundary on the west side of Flanders basin.

There is great need to address travel management in Alternative D and forest planning in general now, not subsequent to the plan revision decision. A few site specific travel decisions as well as travel definitions need to be made now in the Forest Plan.

- * Bicycles need to be defined. Failure to do so in 2006 has led to uncontrolled proliferation of inappropriate and damaging use of downhill bikes, e-bikes, and fat tire bikes. These 3 types of bicycles have no place on forest service trails or ski trails. Mountain bicycles need to be tightly defined.
- * The Big Sky Snowmobile Trail can and should be relocated outside of the WSA from its intersection with Porcupine Creek and on south. From 320 Ranch to Taylor Fork, there is no trail and snowmobilers use the highway shoulder to travel. This is dangerous. Snowmobilers say that the section of the trail from Porcupine to Buffalo Horn is very challenging and infrequently traveled.
- * During a hearing in the Emerson Cultural Center in Bozeman on the 2006 Travel Plan I heard former Gallatin Forest Supervisor Paul Weingart say that multiple use does not mean all uses in the same place at the same time. However, it is current Custer Gallatin National Forest practice to do this in travel management. This has resulted in increased user conflict and hiker dissatisfaction. The forest experience of sharing a trail with multiple speeding bicycles and noisy stinky motorcycles is no better than walking the streets of downtown Bozeman on a busy summer day.
- * The Travel Plan is 13 years old and significantly out of date in certain places and prescriptions, Hyalite Canyon for one.

Finally, in the Plan in general, the vague and flexible definition of backcountry areas is a problem. It more or less allows whatever uses the Forest favors at any one time and is impossible to comment on.

For the Pryor Mountains Alternative D is the only acceptable choice. "Backcountry Areas" designation is weak and inadequate because it maintains current management despite the fact that a lot has changed in the past 33 years. Increasing population and changing vehicle technology are negatively impacting the Pryors and the ecological, cultural, and scientific values of this rare landscape. The Pryor Mountains include landscape and ecosystem types that are underrepresented in the National Wilderness Preservation System - or not represented at all. Wilderness regulations provide important landscape protection. The four Pryors RWAs are a moderate and balanced proposal. Nearly all the existing motorized and bike routes will remain

1Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere* 7(10):e01492. 10.1002/ecs2.1492

2Fire study shows landscapes such as Bitterroot's Sapphire Range too hot, dry to restore trees by ROB CHANEY rchaney@missoulain.com Mar 11, 2019 Updated Mar 12, 2019 (https://missoulain.com/news/local/fire-study-shows-landscapes-such-as-bitterroot-s-sapphire-range/article_a0a26733-6c65-5d6e-8538-18aeb203767d.htm)

3Kimberley T. Davis, Solomon Z. Dobrowski, Philip E. Higuera, Zachary A. Holden, Thomas T. Veblen, Monica T. Rother, Sean A. Parks, Anna Sala, and Marco P. Maneta. Wildfires and climate change push low-elevation forests across a critical climate threshold for tree regeneration. *PNAS* (Proceedings of the National Academy of Sciences) published ahead of print March 11, 2019 <https://doi.org/10.1073/pnas.1815107116>.

3 Testimony of Dr. Dominick A. DellaSala, Chief Scientist, Geos Institute, Ashland Oregon, Before the U.S. House of Representatives Natural Resources Committee, Subcommittee on Oversight and Investigations, September 27, 2017

Oversight Hearing "Exploring Solutions to Reduce Risks of Catastrophic Wildfire and Improve Resilience of National Forests"