



P.O. Box 9254, Missoula, MT 59807

June 6, 2019

To: Custer-Gallatin National Forest

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

The Flathead-Lolo-Bitterroot Citizen Task Force is based in Missoula, Montana. We are a group of individuals and organizations networking together to protect National Forests, wildlife and wildlands in the Northern Rockies.

We support Alternative D and the wilderness recommendations with the following additions: all 230,000 roadless acres in the Gallatin Range Must Be Recommend for Wilderness in the final forest plan.

The plan should also prohibit all motorized and mechanized uses (including mountain bikes), and any other activities not consistent with wilderness protection, in all roadless areas to preserve their wilderness qualities. Mountain biking in grizzly bear habitat has been identified as an extreme safety hazard by grizzly bear experts including Dr. Christopher Servheen, former Grizzly Bear Recovery Coordinator.

Many of the areas on the forests serve as linkage habitats for grizzly bears to connect Greater Yellowstone with the NCDE and the Salmon-Selway-Bitterroot region. These include the Bridger and Bangtail Ranges, north Gallatin Range, north Absaroka Range, the Pryor Mountains and areas between the Pryors and Beartooth Mountains. The Forest Plan needs to establish road and trail density standards for these linkage areas and protect all aspects of grizzly bear habitat, including denning areas.

We are also concerned that current wilderness management plans allow excessively large groups of up to 25 head of stock (horses and mules) and 15 people in most areas. Research shows that impacts increase significantly when group-sizes exceed eight head of stock and 12 people. The Plan should adopt a management standard limiting group size to no more than eight head of stock and 12 people forest-wide and not just in Wilderness. A total party size of 20 beings is plenty. Groups larger than that size need to apply for Special Use Permits that are subjected to environmental analysis.

Sincerely,

Patty Ames
President
Flathead-Lolo-Bitterroot Citizen Task Force