

Analysis of the Proposed Greater Yellowstone Conservation and Recreation Act

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Executive Summary

The Gallatin and Madison Ranges in southwest Montana are an important component of the Greater Yellowstone Ecosystem and comprise the largest unprotected roadless area in the ecosystem.

The Gallatin Forest Partnership (GFP) is a “forest collaborative” which had an outsized influence on the revision of the Custer Gallatin National Forest Plan which largely mirrors the GFP proposal. Its key members are the Greater Yellowstone Coalition, The Wilderness Society, Wild Montana, the Winter Wildlands Alliance and motorized and mechanized user groups. What they did not achieve through the Revised Forest Plan they seek to enact through proposed federal legislation titled “The Greater Yellowstone Conservation and Recreation Act,” (GYRA) which would override the Forest Plan, the National Forest Management Act and the 2012 Planning Rule.

GFP member Winter Wildlands Alliance previously wrote:

“The forest plan is something to celebrate, but we’re not done yet. Now, we need Congress to act on the Forest Service’s recommendations and pass legislation that cements the protections and balance envisioned in this forest plan. It also includes a number of backcountry areas, which provide remote, semi-primitive recreation opportunities...motorized and mechanized recreation may be allowed...This is an important tool to protect wilderness experiences and undeveloped areas while allowing established motorized and mechanized recreation to continue.”¹

The GYRA would institutionalize increased fragmentation of the Greater Yellowstone Ecosystem and degradation of critical wildlife habitat, migration corridors and habitat linkages to other ecosystems. The increased recreation footprint represents an imminent threat to the ecological integrity and wilderness values of this region.

¹ H. Eisen. *Custer Gallatin forest plan is good news for winter recreation*. Bozeman Chronicle 2/19/2022.

As of this writing, a copy of the proposed legislation and maps were not publicly available. Therefore, a combination of the descriptions of the GYRA online at <https://www.greateryellowstoneact.org/the-legislation> and the Proposal from the Gallatin Forest Partnership were used as a basis for the legislation which members previously said would become proposed legislation.

Background

The Madison-Gallatin geographic region in southwestern Montana is part of one of the most intact, diverse and wildlife rich areas in the temperate zones of the Earth. The Greater Yellowstone Ecosystem is home to iconic species that are symbols of Wild America including the American buffalo, grizzly bear and wolf. Predator-prey relationships continue to keep the ecosystem in balance.

The community of wildlife is nearly complete with 98% of the native species still here². The Madison-Gallatin geographic region also hosts seasonal migrations of large mammals including elk, buffalo, mule deer and bighorn sheep emanating from the ecosystem core in Yellowstone National Park. The role that this landscape plays in maintaining wildlife populations that live part of the year in Yellowstone National Park and connecting biodiversity to other areas of the Northern Rocky Mountains cannot be understated.

This geographic region has a high level of “species richness.” According to the Montana Natural Heritage Program³ there are a total of 4,942 species of mammals, birds, reptiles, amphibians, fish, invertebrates, vascular plants, bryophytes, lichens and algae within Fish, Wildlife & Parks Region 3, which encompasses the Madison-Gallatin region.

There are 94 mammal species of which 22 are Species of Concern and 10 are Potential Species of Concern. Major predators/carnivores are the omnivorous grizzly bear and black bear along with bobcat, lynx, coyote, fisher, wolf, marten, mountain lion, red fox, swift fox and wolverine. Major ungulate species are bighorn sheep, buffalo, elk, moose, mountain goat, mule deer, pronghorn antelope and white-tail deer.

There are 382 species of birds with 63 being Species of Concern including the American white pelican, bald eagle, golden eagle, black-backed woodpecker, Clark’s nutcracker, great blue heron, great gray owl, harlequin duck, northern goshawk, trumpeter swan, sandhill crane and whooping crane.

² FL Craighead 2015. Wilderness, Wildlife, and Ecological Values of the Hyalite-Porcupine Buffalo Horn Wilderness Study Area. A Report for the Lee and Donna Metcalf Foundation.

³ Montana Natural Heritage Program. 2023. Species Field Guides. Helena, MT.
<https://fieldguide.mt.gov/speciesDetail.aspx?elcode=AMAJB01020>

In addition to the mammalian fauna, native fish species include Yellowstone cutthroat trout, westslope cutthroat trout and mountain whitefish, although native arctic grayling have likely disappeared. Mountain lakes have wild populations of golden trout. The two major rivers that drain this area are the Madison and the Gallatin which both originate in Yellowstone National Park.

This is rugged mountain country which includes over 50 miles of the Continental Divide Trail. There are at least 21 peaks above 10,000 feet and four above 11,000 feet. Sitting astride the Yellowstone Plateau, the long harsh winters with deep snow leads many species to migrate into the Madison-Gallatin areas to lower elevations where forage is easier to obtain.

The high topographical ruggedness increases species diversity, micro-climates and overlap in ecological types. "Topographically complex regions on land and in the oceans feature hotspots of biodiversity that reflect geological influences on ecological and evolutionary processes."⁴

A significant amount of this area is encompassed by the Custer-Gallatin National Forest and its location adjacent to Yellowstone National Park plays a major regional role in connecting wildlife habitat found in the major wildland ecosystems of the Northern Rockies as well as recovery of species listed as threatened and endangered under the Endangered Species Act (ESA) and species proposed for listing.

There is a long history of strong support for protecting the wildlife and wilderness of the Gallatin Range. The southern part of the range was protected by the establishment of Yellowstone National Park in 1872.⁵ In 1910, Forest Service Chief Gifford Pinchot advocated for protection of the southern Gallatin Range as a wildlife refuge.

A year later the State of Montana established a wildlife refuge in the Buffalo Horn-Porcupine drainages.⁶ Work to purchase inholdings began in 1925 and in 1947 the State of Montana purchased eight sections (5,120 acres) in the Buffalo Horn drainage to protect critical elk ranges. In 1958, the year the Montana Wilderness Association was founded in Bozeman they insisted the Regional Forester cancel plans to road and log Porcupine and Buffalo Creeks and he agreed.⁷

⁴ Badgely C, R Smiley, R Terry, EB Davis, LRG DeSantis, DL Fix, SSB Hopkins, T Jezkova, MD Matocq, N Matze, JL McGuire, A Mulch, BR Riddle, VL Roth, JX Samuels, CA Stromberg and BJ Yanites. 2017. Biodiversity and Topographic Complexity: Modern and Geohistorical Perspectives. *Trends in Ecology and Evolution* 32(3):211-226.

⁵ An Act to set apart a certain Tract of Land lying near the Head-waters of the Yellowstone River as a Public park. March 1, 1872. 42nd Congress.

⁶ R. Noss et al. Letter from more than 100 scientists and conservationists in support of 230,000 acres of Wilderness in the Gallatin Range. In: T. Wilkinson, *Big Guns Want 230,000 Acres of Gallatins Near Yellowstone Protected as Wilderness*. *Mountain Journal* 5/14/2019.

⁷ Wild Montana, Journal of the Montana Wilderness Association. *Wild lands of the Gallatin*. 27(1):1,10. (1986).

The Director of the Montana Department of Fish, Wildlife and Parks testified the Gallatin Range provides 70% of the winter range for the Gallatin Elk Herd that summers in Yellowstone National Park, has winter range for the highest concentration of wintering moose in the Gallatin, Madison and Yellowstone drainages, and has lands vital to recovery of the endangered grizzly bear population in the GYE.⁸ The Paradise Valley Herd also uses the Gallatin Range.

Federal legislation pertinent to this area includes the Montana Wilderness Study Area Act, S. 393 (1977)⁹, which designated 155,000 acres of the Gallatin Range in the Hyalite Porcupine Buffalo Horn area as a Wilderness Study Area (WSA). Currently, The Northern Rockies Ecosystem Protection Act¹⁰ which is before Congress would designate all inventoried roadless areas in the Gallatin and Madison Ranges as Wilderness.

It is clear that S. 393 requires protection of the outstanding wilderness character of the wilderness study areas until Congress would move on final disposition, stating:

“the wilderness study areas designated by this Act shall, until Congress determines otherwise, be administered by the Secretary of Agriculture to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System.”

Over 100 scientists and organization leaders including Dr. Reed Noss, former Interior Secretary Bruce Babbitt, former Yellowstone Superintendent Mike Finley, principal GYC founder Rick Reese, former GYC executive director Mike Clark and a host of former GYC program directors and MWA council members¹¹ called for 230,000 acres of Wilderness for the Gallatin Range:

“It has long been recognized by the scientific community that protected areas in isolation fail to preserve species and ecosystem processes adequately. Wildlife corridors provide connectivity, sustaining vital natural processes, wildlife populations, and biodiversity while allowing species to move in response to climate change. The Gallatin Range is a recognized wildlife corridor linking YNP to the Northern Continental Ecosystem.”¹²

These are mostly in the higher and less-productive elevations. Dr. Frank L. Craighead wrote:

⁸ Testimony of P. Graham, Director of Montana Department of Fish, Wildlife and Parks on H.R. 873 (1993).

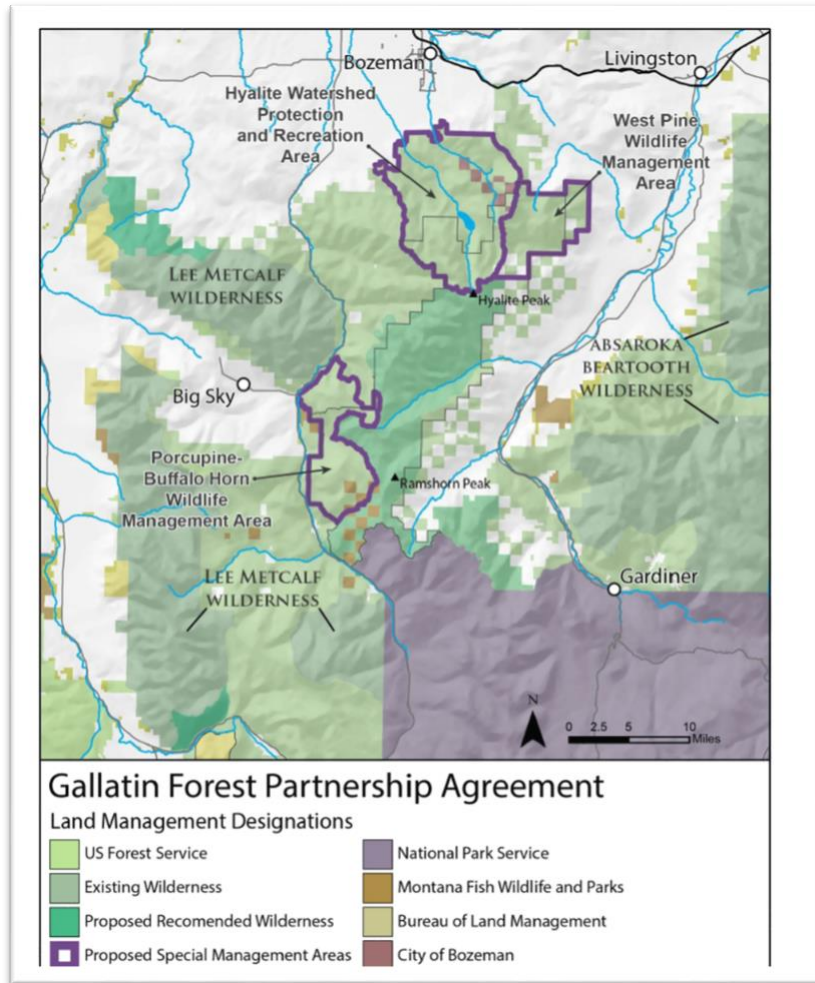
⁹ Public Law 95-150, 95th Congress. *The Montana Wilderness Study Area Act*. (1977).

¹⁰ *Northern Rockies Ecosystem Protection Act*, H.R. 1755, S. 1276, 117th Congress. (2022).

¹¹ *see footnote 6*

¹² *see footnote 6*

“Fragmenting the HPBH WSA 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.”¹³



Proposed Designations

Despite the long history of wilderness advocacy and overwhelming public support for designating Wilderness in the Gallatin Range, the GYRA would designate only 92,000 acres of Wilderness, just 59% of the Wilderness Study Area of 155,000 acres and just 40% of the 230,000 acres eligible for Wilderness in the Gallatin Range. It would designate 15,000 acres of the Cowboys Heaven area in the Madison Range and about 6400 acres in an addition to the south end of the Lee Metcalf Wilderness. In total, GYRA designates 124,000 acres of Wilderness, about 1/3 of what is eligible for Wilderness designation by Congress.

The GYRA fragments the WSA and adjacent wildlands into four different designations with “a combination of conservation and recreation designations in the heart of the Gallatin Range and

¹³ see footnote 3

portions of the Madison Range to protect wildlife habitat, clean water, undeveloped lands and diverse recreation access.” Most of the lower elevation lands critical to the Gallatin Elk Herd, bighorn sheep, grizzly bears and other species¹⁴ are recommended for other designations that allow logging and high-intensity recreation including extensive trail development.

Within recommended Wilderness the GYRA management plan states: “Allow restoration activities (like the use of prescribed fire or weed management) when necessary where the activities protect and/or enhance the existing wilderness character.” These are not conforming uses within designated Wilderness and while there is authority to suppress fires in Wilderness, there is no authority to start them.¹⁵

Proposed West Pine Wildlife Management Area

This area is carved out of the WSA as a Wildlife Management Area. It allows active management to “reduce wildfire hazards in the Wildland Urban Interface.” That is an abuse of the definition¹⁶ and most ignitions start on private lands, not Forest Service lands.¹⁷ Co-author Dunn said: “The main source of our communities’ exposure to wildfire risk is clearly not our national forests.”¹⁸ West Pine is part of a Wilderness Study Area and can hardly be said to be on the edge of urban areas. This language is inconsistent with the purpose “To maintain the presently existing wilderness character of the area.”

“Allow mountain bike use on all existing Forest Service system trails in the area.” This also conflicts with maintaining the presently existing wilderness character. Moreover, it allows construction of extensive loop trails for mountain bikes, significantly increasing wildlife dispersal and displacement, especially of the large elk herds reliant on the West Pine’s open and mixed meadow and forest country.

Proposed Hyalite Watershed Protection and Recreation Area

This new category of land management is proposed in response to high recreation use in the north end of the Gallatin Range. While it is co-billed as protecting the municipal water supply for Bozeman, it’s principal management goals pertain to recreation. It does not recommend Wilderness for the portion of the watershed within the WSA. Rather, it recommends no new trail construction within the WSA portion, which isn’t the same as Wilderness.

¹⁴ see footnote 3

¹⁵ Wilderness Watch et al. *Objection of Mid-Swan Project, Flathead National Forest*. 10/25/2021.

¹⁶ R. Chaney. *Fire strategy stuck with old tactics, experts warn*. Missoulian 1/19/2022.

¹⁷ Downing et al. *Human ignitions on private lands drive USFS cross-boundary wildfire transmission and community impacts in the western US*. Scientific Reports 12:2624. (2022).

¹⁸ L. Lundquist. *Study: Most destructive wildfires have started on private land*. Missoula Current 2/28/2022.

For the non-WSA portion, new trail development is encouraged including loops. New access points are envisioned for non-motorized winter recreation. This means new trails dedicated to non-motorized use in addition to the existing motorized use routes, expanding impacts on wildlife across a larger footprint. It calls for the Forest Service to *“develop partnerships with non-governmental organizations to increase maintenance and funding capacity within the recreation area.”* This is a step towards privatization of public lands management and encourages “pay to play.”

To pay for new recreation infrastructure in other parts of the Gallatin Range, this section of the GFP proposal calls for the Forest Service to develop a fee-based system for all or part of the Recreation Area. Thus, one purpose of the Recreation Area is to manage for a high-use, high-intensity recreation environment and tap it financially to expand recreation infrastructure throughout the Gallatin Range. In that way the designation is an inroad towards establishing more dedicated recreation areas.

Finally, this proposed designation allows for *“active vegetation management”* in areas outside the WSA to *“address watershed health and wildfire hazards.”* According to the U.S. Forest Service revised NEPA regulations¹⁹ this can include commercial timber sales categorically excluded from the NEPA process.

Proposed Porcupine-Buffalo Horn Wildlife Management Area

The Porcupine Buffalo Horn is the connection between the WSA and the Lee Metcalf Wilderness. The allowed uses will add to fragmentation in the GYE. The GFP proposal states one of the purposes of the designation is *“To maintain the presently existing wilderness character of the area.”* But the GYRA does not designate Wilderness. Rather, the focus is on maintaining recreational access *“including mountain biking, motorcycling, hiking, horseback riding, cross country skiing and snowmobiling,”* many of which are non-conforming uses in Wilderness and violate the Montana Wilderness Study Areas Act. Commercial timber harvest and new road construction would be prohibited.

The GFP proposal states: *“Immediately following completion of forest plan revision conduct travel analysis for all trails within the P-BH area, designate additional system trails as necessary, and allow no new trail construction following this process.”* This could encourage the Forest Service to convert illegal user created trails and incorporate them into the official, numbered trail system, rewarding renegade trail construction that was done without environmental analysis of the cumulative impacts on soils, water quality, wildlife and other resources. As in the Hyalite designation, this section encourages the Forest Service to develop partnerships with non-governmental organizations in the maintenance of the area or more “pay to play.”

¹⁹ 36 CFR Part 220. National Environmental Policy Act (NEPA) Compliance. Fed. Reg. 85(224):73620-73632. (2020).

Recreation

Under the category Recreation the GFPA identifies four areas outside of their proposed designations for which they make management recommendations. These emphasize high-intensity recreation use and logging in the guise of the “Wildland-Urban Interface.”

East Side of Gallatin Range— Parts of the east side of the Gallatin Range outside the WSA remain in a checkerboard ownership pattern, including a mix of state and federal lands. Many of these lands are roadless and their lower elevation location make them important to wildlife as both winter and spring ranges.²⁰ The GFP proposal recommends that efforts continue to consolidate ownership and its Management Goals for this area are: *“Facilitate cooperative stewardship and land management”* and *“Address wildfire hazards and public access issues.”* These management goals are a threat to the low elevation wildlife habitat through another misapplication of the Wildland Urban Interface concept.

Gallatin Roaded Area— The Gallatin Roaded Area is heavily roaded and has a history of timber harvest and fire. Rather than dedicate this area to restoration, the GFP proposal calls for a variety of actions that will exacerbate the trail and road density, cover issues and disturbance/displacement of wildlife. It’s chief management goal is *“Enhance diverse recreation opportunities.”* It’s Management Recommendation is:

“After forest planning, conduct travel analysis and trails planning in order to provide more high-quality recreation experiences including some use-specific trails, ‘destination’ trails and improved trail connectivity from north to south to link the communities of Bozeman/Gallatin Gateway to Big Sky and West Yellowstone.”

Use-specific trails mean new trails in addition to the existing trail system. The emphasis is on connectivity for high-speed recreation and not connectivity for wildlife.

The GFP recommends *“Utilize restoration focused active vegetation management to move the landscape’s forest habitats to a more resilient condition and reduce fuels in the Wildland Urban Interface.”* This mimics the Forest Service. It’s only true restoration recommendation is to reduce the number of unneeded legacy roads including conversion to recreation trails. This would also increase the mechanized and motorized trail density. Finally, in another nod to recreation the GFP recommends consideration of *“trailhead facilities and access for vehicles with trailers for existing and new trailheads.”*

Gallatin Corridor Day Use Area— This highly scenic area is on the west side of the Gallatin Range bordering US 191 and within the Gallatin River Canyon. The Gallatin River qualifies for inclusion in the National Wild and Scenic Rivers System. In the center of this area is the

²⁰ see footnote 3

community of Big Sky and its large resort complex. Like many traditional ski areas, Big Sky has transformed into a four-season resort complex with an ever-expanding footprint. The GFP cites

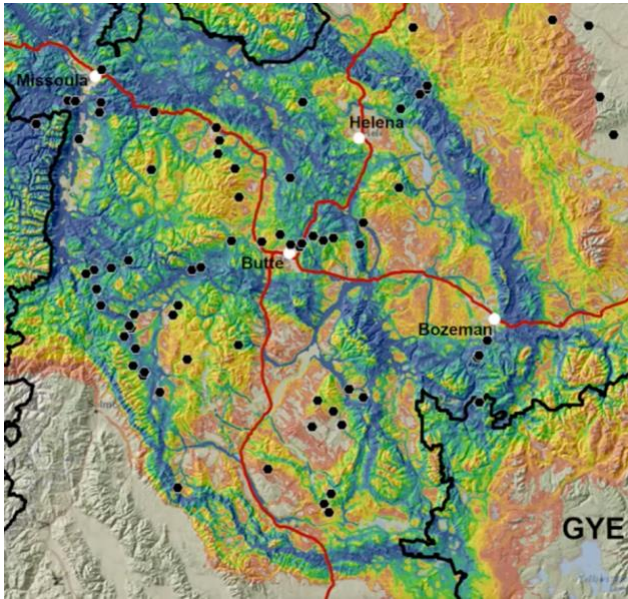


Figure 1. The Recreation Act Would Negatively Impact a High Value Connectivity Area for Grizzly Bears Shown in Blue. From Sells, et al, 2023.

high or over-use of the area but prescribes management that would aggravate this problem. For example, the GFP Management Goals are “Mitigate the impact of growing use of CGNF lands along the Gallatin corridor, by maintaining and, in some cases, enhancing trailhead access and facilities.” This seems counterintuitive. Management recommendations include: “Where feasible (given land available and other limitations), expand parking and provide turnaround for trailer rigs at trailhead locations.” These sorts of facilities encourage more use through additional infrastructure and capacity. The corridor is also adjacent to the proposed Porcupine Buffalo Horn Wild Management Area, which the GFP says includes diverse recreation to accommodate the growing demand of the Big Sky community. Dedicating the Gallatin River

Corridor to intensive, all-season recreation threatens the linkage between the Gallatin and Madison Ranges, further fragmenting the Greater Yellowstone Ecosystem.

East Side Paradise Valley-Mill Creek and Mission Creek Travel Planning Areas— This area is located on the lower slopes of the Absaroka Range west of the Absaroka-Beartooth Wilderness. Citing a lack of moderate grade non-motorized trails near Livingston, the GFP encourages the Forest Service to:

“...build new or rehabilitate existing trails to meet this need. Invest in new trail development outside of Wilderness, while maintaining a semi-primitive, non-motorized recreation setting between Pine Creek and Mill Creek and the lands around Livingston Peak trailhead. Ensure land allocations do not conflict or prohibit these future trail opportunities.”

Outside the designated areas, approximately 175,000 acres of roadless areas linking the two parts of the Lee Metcalf Wilderness and the Lionhead area are released to general forest management meaning logging, roads and motorized recreation.

Outfitting and Guiding

The GFP calls for a programmatic analysis of overall capacity on the Custer Gallatin based on an administratively and socially acceptable basis, not environmental capacity, and for the Forest Service to:

“Work with outfitters to adapt the allocation of user days to address needs related to ensuring business viability and stability. Ensure the outfitter and guide program can respond to changing demographics and recreation interests by encouraging additional outfitting and guide services on the forest beyond traditional uses like hunting, fishing, and horseback riding.”

Wildland, Prescribed Fire and Timber

This section opens all the areas outside of the GYRA designations to *“all the tools in the toolkit including timber harvest...”*

“Outside of the GFP’s agreed upon designated areas, focus active management of fire and timber on restoring the forest habitats of the Gallatin and Madison Ranges to more resilient conditions based on the natural range of variation where necessary and appropriate. Focus active vegetation management in the Wildland Urban Interface to reduce the risk posed by high severity wildfire to homes, infrastructure, and municipal water supplies.”

Under either the Wildlife Management Area or “backcountry” designation, these areas would not be anything like Wilderness, with logging, snowmobiling, dirt bikes, mountain bikes and new trail systems all allowed.

Wild and Scenic Rivers

The GYRA does not designate any rivers or streams for protection under the Wild and Scenic Rivers Act.²¹ The Revised Plan found 6 streams that are eligible for designation as Wild, Scenic or Recreational Rivers.

The Environmental Costs of Recreation

To see the impact of recreational desire on the GFP, one only has to look at the claim that high-intensity recreation is compatible and can *“maintain the currently existing wilderness character.”* This tactic of equating increased recreation with conservation obscures recreation impacts.²² Legendary Montana wilderness guide Smoke Elser observed there is a new breed of recreationist on the land:

²¹ Public Law 90-542; 16 U.S.C. 1271 et seq. National Wild and Scenic Rivers System. (1968).

²² M. Bader, *Industrial Recreation Isn’t Conservation*. Counterpunch. 8/18/2020

*“Mountain bikers are out to challenge the resource. It’s about how fast you can go and how many miles you can put on. Snowmobilers are after the highest mark on the hillside, the highest speed across the meadow.”*²³

In the 1980s manufacturers began producing recreational machines that could go farther into previously inaccessible terrain. High power snowmobiles can traverse deep powder snow, enabling off-trail “high marking.” Mountain bikes became widely available and now feature shock absorbers, gas and electric-powered motors and spiked tires for over-snow use. ATVs are bigger and go faster. New technology includes snow bikes which are modified motorcycles with tracks instead of wheels which can access off-trail areas and negotiate tight spaces. Mountain bike advocates say that electric powered bikes are not motor vehicles but that’s like saying a Prius or a Tesla isn’t an automobile because they have electric-powered engines.

The GYRA ignores the scientific information on the impacts on wildlife and wildlands resulting from increased recreation, particularly mountain biking. Dr. David J. Mattson and other leading grizzly bear scientists have analyzed the impacts of different forms of recreation on grizzly bears, finding that mountain biking is many times more likely to result in a grizzly bear-human encounter.²⁴ Dr. Mattson is well-known in the Greater Yellowstone area as the former Field Team Leader of the Yellowstone Interagency Grizzly Bear Study Team.

Likewise, a Board of Inquiry Report chaired by former National Grizzly Bear Recovery Coordinator Dr. Chris Servheen²⁵ on the death of a mountain biker who crashed into a female grizzly bear with cubs was well-publicized. Dr. Servheen has also said that mountain biking in grizzly bear habitat is particularly conducive to bear-human confrontations due to surprise encounters.

*“High speed and quiet human activity in bear habitat is a grave threat to bear and human safety and certainly can displace bears from trails and along trails. Bikes also degrade the wilderness character of wild areas by mechanized travel at abnormal speeds.”*²⁶

Mountain bikers can also displace grizzly bears and other wildlife including elk from primary habitats. Biologists with the U.S. Forest Service recently found all trail-based recreational uses have negative impacts on elk, with mountain bikes and ATVs having the most.²⁷ Wildlife

²³ R. Chaney. *Bike deal adds heartache, hope to Bob Marshall Wilderness proposal*. Missoulian 4/23/2017.

²⁴ D. Mattson, video grizzlytimes.org

²⁵ C. Servheen et al. *Board of Review Recommendations related to mountain bike safety in bear habitat based on the fatality of Mr. Brad Treat on June 29, 2016*. (2017).

²⁶ T. Wilkinson. *Griz Expert Says ‘Mountain Bikes Are A Grave Threat To Bears.’* Mountain Journal 5/26/2020.

²⁷ M. Wisdom, et al. *Elk responses to trail-based recreation on public lands*. Forest Ecology and Management (411) (2018).

managers with the Colorado Parks and Wildlife determined that burgeoning year-round recreational use has nearly decimated a large elk herd near Vail.²⁸

The entire area covered by the GYRA has been identified as higher potential habitat for wolverine, an elusive species that requires snow for its habitat. Opening areas to over snow vehicles and increased backcountry winter recreation will increase disturbance of wolverines, now listed as Threatened under the ESA.

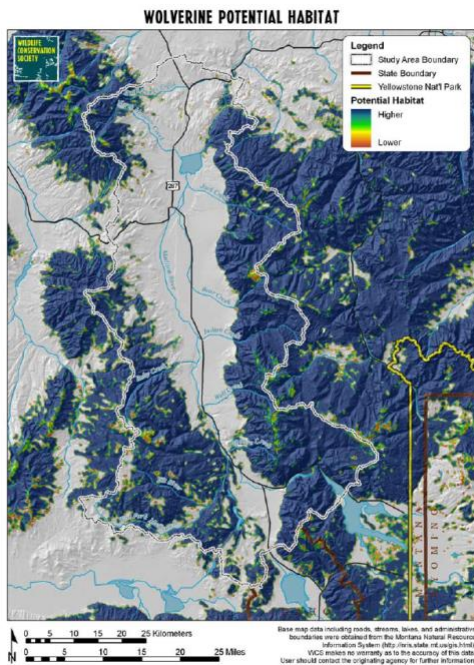


Figure 2. The Entire Gallatin-Madison Area Has High Potential for Wolverine Habitat. From Brock et al. 2006.

The Craighead study of the ecological values of the WSA cited increased recreation use as an increasing threat to the wildlife and fish of the Gallatin Range including habitat connectivity.²⁹

Climate Change

The GYRA proposal says nothing about climate change. This is a major threat to the ecology of the area.

Conclusion

The Wilderness Act is the “gold standard” for protection of wilderness, wildlife and fish habitat and biological diversity^{30 31}.

The GYRA succumbs to the hedonistic demands of the outdoor recreation lobby. As the human population and visitation both grow, the pressure on native wildlife and fish will diminish this resource. The designations in the GYRA are not well-suited to the unique landscape they are applied to and will fragment wildlife habitat and diminish the effectiveness of a key linkage between the Greater Yellowstone and NCDE.

The GYRA would release approximately 240,000 acres of Wilderness eligible lands by legislating management that permanently degrades the wilderness values that qualify them for Wilderness designation. This “finality” removes tools from wilderness advocates and the management flexibility necessary to respond to changing conditions such as climate change and

²⁸ <https://www.theguardian.com/environment/2019/aug/25/hiking-elk-driven-to-brink-colorado-vail>

²⁹ see footnote 3

³⁰ M. Bader. *Wilderness-Based Ecosystem Protection in the Northern Rocky Mountains of the United States*. Wilderness Science in a Time of Change. USDA Forest Service Proceedings RMRS-P-15-VOL-2. (2000).

³¹ see footnote 126

new science on species needs and impacts from recreation. The new recreation infrastructure will be essentially permanent features of the landscape with little chance of reversing course.

The GYRA would significantly fragment the Gallatin and Madison Ranges and diminish its value for inter-ecosystem connectivity between the GYE and NCDE. The GYRA would also set a negative precedent for management of National Forests nationwide, whereby self-appointed collaboratives and their supporters in Congress legislate special management for portions of the National Forest System without representing the national public interest. The political management of National Forests by legislation, District by District, Forest by Forest, threatens the integrity and consistency of National Forest System management. Agency management based on the best available science as required by the 2012 National Forest Planning Rule³², and full public involvement through the NEPA process are compromised, ultimately compromising The Public Trust.

³² National Forest Planning Rule of 2012. <https://www.fs.usda.gov/detail/planningrule//home/>

This review was commissioned by the Gallatin Yellowstone Wilderness Alliance and Bold Vision Conservation.

Author disclosure: The author is not a member of the Gallatin Yellowstone Wilderness Alliance or Bold Vision Conservation and he did not participate in or comment on the Revised Custer Gallatin National Forest Plan.

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