

## **Draft Assessment of Existing Conditions and Preliminary Need to Change Reports**

Virginia Kelly  
Forest Plan Revision Team Leader  
Custer Gallatin National Forest  
10 E Babcock, P.O. Box 130  
Bozeman, MT 59771

Dear Virginia:

Please accept this letter on behalf of the Montana Wilderness Association (MWA) in response to the Forest Service's request for comments on the Draft Assessment of Existing Conditions and Draft Preliminary Need to Change reports.

MWA is excited for the opportunity to provide feedback during this important step in forest plan revision. We commend the Forest Service on these well-organized, well-written reports. We hope you find the comments below are helpful.

### **Organizational Background**

For more than 50 years, MWA, a 501c3 organization, has been working with communities across the state to protect Montana's wilderness heritage. Our work began in 1958 when our founders sent a letter to 100 friends, inviting them to join a citizen-led effort to protect the Madison and Gallatin Ranges. Since that time, our commitment to grassroots conservation has proved instrumental in the passage of the 1964 Wilderness Act and in the designation of all 15 wilderness areas in Montana. Near the Custer Gallatin National Forest (CGNF), we staff field offices in Bozeman and Billings, and our members, organized into seven chapters statewide, provide a unique grassroots perspective on projects such as the CGNF forest plan revision. We are committed to protecting the wilderness values, preserving the cultural significance, and maintaining opportunities for quiet recreation found on the CGNF via this forest planning process. As the forest planning process moves forward, please do not hesitate to contact any employee of MWA.

The Draft Preliminary Need to Change document identifies preliminary needs to change management direction in the current forest plans for the Custer and Gallatins forests. The comments below are needs for change that MWA finds necessary in the revision process.

### **Managing Recommended Wilderness Areas (RWAs) for social and ecological characteristics that preserve wilderness character**

*Need to change: Prohibit non-conforming uses in recommended wilderness so as to preserve the land's wilderness character.*

We strongly agree with the forest's assessment that "there is a need for plan direction to guide the management of new and emerging technologies that may affect recreation opportunities" and that "(a)dvances in technology have greatly impacted the recreation resource in the past 20 years," found on page 5. Our experiences working with both the 2012 planning rule and on other national forests, including the CGNF, have given us a unique perspective, explained below, on why this need to change is critical.

Public land managers are responsible for managing recommended wilderness areas and wilderness study areas to preserve wilderness character and their potential for future inclusion into the National Wilderness Preservation System (NWPS). For this reason, we believe prohibiting mechanized transport, motorized use and other non-conforming uses in RWAs, to properly protect these lands and maintain their consideration for designation to NWPS is in the community's best interest and supported by both policy and case law.

Since the implementation of the current forest plan, the guiding policies for the management of RWAs have changed. As the Assessment states, new and unanticipated forms of recreation, such as mountain biking, gained popularity since the current forest plans of the mid-1980s were created. And various case studies, lawsuits and travel and forest planning decisions relating to the management of RWAs require further consideration in the need to change document.

The Bitterroot National Forest recently finalized its Travel Management Plan and made the following observation specific to management of RWAs in the Record of Decision:

*"If the long term desire for the areas is wilderness designation, it makes sense to me to manage them in a manner consistent with the Forest's recommendation."* Bitterroot NF Travel Management Planning, Final ROD, p 25-27

Not only is it important to manage RWAs "in a manner consistent with the Forest's recommendation"<sup>1</sup> that reduces the ecological or social characteristics of wilderness, but managing them in a way that can negatively affect their ultimate inclusion into the National Wilderness Preservation System is out-of-step with the: 1) 2012 Planning Rule, 2) 2015 Forest Service Manual Directives, 3) the Forest Service Handbook and 4) Region 1 guidance. In addition to the agency's guidance, there is legal precedent for agencies managing RWAs for their wilderness character. Also, a review of RWAs in Region 1 reveals a trend in the loss of RWA when the agency chooses to allow non-conforming uses.

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<sup>1</sup> Bitterroot NF Travel Management Planning, Final ROD, p 25-27

### 2012 Planning Rule

The 2012 planning rule<sup>2</sup> states:

*“The plan must provide for... Protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.”*

The direction in the 2012 Planning Rule that instructs the USFS to “protect and maintain the ecological and social characteristics ... for wilderness designation (emphasis added)” provided much of the basis for Julie King, Bitterroot NF Supervisor, to prohibit non-conforming uses in RWAs in the 2016 Record of Decision for the Bitterroot Travel Management Plan.

Supervisor King articulates the inability to maintain wilderness character while allowing for non-conforming uses stating:

*“Additionally, allowing uses that do not conform to wilderness character creates a constituency that will have a strong propensity to oppose recommendation and any subsequent designation legislation. Management actions that create this operating environment will complicate the decision process for Forest Service managers and members of Congress. It is important that when the wilderness recommendations are made to Congress that they be unencumbered with issues that are exclusive to the wilderness allocation decision... In response to the DEIS, the Forest received a number of comments from members of the mountain biking community, both local and national, regarding prohibiting mechanical transport use, including bicycles, in the RWAs. They feel that mountain bikes do not physically impact these areas, nor do they have the same impacts as motorized vehicles... prohibiting bicycles and other types of mechanical transport acknowledges there are impacts on the social and biotic environment that do not show as physical “scars” on the land, but which are inconsistent with the wilderness character I am responsible for maintaining.”*

We strongly urge the CGNF NF to consider a need to change the management of RWAs to a manner that is consistent with the Forest’s recommendations and prohibit uses that are non-conforming to the Wilderness Act.

### 2015 Forest Service Manual

The 2015 Forest Service Manual<sup>3</sup> planning directives address the management of RWAs. Those directives state:

*“Any area recommended for wilderness or wilderness study designation is not*

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<sup>2</sup> 36 CFR 219.10(b)(1)(iv)

<sup>3</sup> (FSM 1923.03(3))

*available for any use or activity that may reduce the wilderness potential of an area.”*

It is important to note, this Manual direction replaced the previous 1923.03 direction, which stated:

*“Any inventoried roadless area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of the area. Activities currently permitted may continue pending designation, if the activities do not compromise the wilderness values of the area.”*

#### Forest Service Handbook

The Forest Service Handbook<sup>4</sup> states:

*“When developing plan components for RWAs, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. In addition, the plan may include one or more plan components for an RWA that:*

- 1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;*
- 2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation;*
- 3. Alter existing uses, subject to valid existing rights; or*
- 4. Eliminate existing uses, except those uses subject to valid existing rights.”*

The Handbook reiterates the direction given in the 2012 Planning Rule by stating all plan components “must,” not may, “protect and maintain the social and ecological characteristics that provide the basis for wilderness designation.” The Handbook also re-states the Forest Service’s authority to “alter” or “eliminate existing uses” in the prevention and maintenance of those characteristics.

#### Region 1 Guidance

Region 1 Guidance<sup>5</sup> states:

*“If it is determined that the area is best suited to motorized or mechanized recreation, the area should not be recommended for wilderness. If it is determined that the best future use is inclusion in the NWPS, the desired condition should reflect that. If there are established uses that are incompatible*

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<sup>4</sup> FSH 1909.12, chapter 70, section 74.1

<sup>5</sup> Consistency in Land and Resource Management Plans, 9/24/2007

*with that desired condition, such as motorized or mechanized recreation, forests should choose to implement one of the following actions:*

- 1. Pursue a non-motorized/non-mechanized approach to management of the area through travel planning.*
- 2. Adjust management area boundary to eliminate the area with established uses*
- 3. Not recommend the area for wilderness designation.*

*Administrative use of motorized equipment for maintenance (chain saws, rock drills, limited use of helicopters) will continue to be allowed."*

#### Legal precedent for wilderness character and RWAs

A 2011 9th Circuit Court ruling<sup>6</sup> stating the Gallatin National Forest erred in its travel management helped further define wilderness character. That ruling, along with *Citizens for Balanced Use v. Erickson* and *Russell Country Sportsmen v. USFS* established that the Forest Service is obligated to consider the social characteristics in its management decisions.

Also, in a case<sup>7</sup> that had implications for national forests across the country, U.S. District Court for the District of Montana upheld Forest Service's authority to restrict non-conforming uses in areas recommended for wilderness protection in the Beaverhead-Deerlodge NF.

At 3.35 million acres, the Beaverhead-Deerlodge is Montana's largest national forest. The revised forest plan only allocated a small minority (18%) of 1.8 million acres of roadless lands to recommended wilderness where mechanized and motorized vehicle use is prohibited. Nevertheless, a coalition of off-road vehicles groups, county commissioners and landowners sued the Forest Service in December 2010 in an effort to overturn the recommended wilderness protections.

The Plaintiff's claims were either dismissed or denied on the merits. This case showed national forests, such as the CGNF, can continue to protect the wilderness characteristics of some of our nation's most spectacular wilderness-quality areas and roadless habitat, where wildlife can thrive and backcountry travelers can enjoy hiking and horseback riding absent the noise and disturbance of non-conforming uses.

Discussed below are several case studies from Region 1 where uses and activities that occurred in areas recommended for wilderness directly reduced the wilderness potential of the area. We urge the CGNF to recognize the need to change accounting for the new direction in the 2012 Planning Rule, 2015 Manual and Handbook and prohibit any non-conforming use in areas recommended for wilderness that reduces

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<sup>6</sup> *Montana Wilderness Association v. McAllister* (666 F.3d 549 (9th Cir. 2011))

<sup>7</sup> *Beaverhead County v. USFS* (US District Court of Montana 2013)

the wilderness potential of that area.

### Region 1 Case Studies

In Region 1, there are several examples that illustrate how Forest Service decisions to allow non-conforming uses in Recommended Wilderness have led to losses of RWA acres in subsequent Forest Planning processes, reducing the wilderness potential for those areas. Summarized below are five (three on the Beaverhead-Deerlodge NF, one on the Kootenai NF and one on the Gallatin NF) case studies across different landscapes where RWAs have decreased in size following RWA management decisions that did not protect and maintain ecological and social characteristics for wilderness designation by allowing non-conforming uses to persist, and by not managing these areas in a manner consistent with the Forest's recommendation.

#### *Beaverhead-Deerlodge National Forest: Mt. Jefferson Recommended Wilderness*

In 1989 the BDNF created the 4,474-acre Mt. Jefferson Recommended Wilderness in the Hellroaring Creek drainage, the ultimate headwaters of the Missouri River. Although small, the Mt. Jefferson RW was adjacent to the 23,054-acre Centennials RW, managed by the BLM, for a combined total of approximately 28,000 acres. The previous BDNF Forest Plan allowed snowmobiling in RWAs, and when snowmobile technology improved in the 1990s, Mt. Jefferson became a publicized snowmobile destination, accessed primarily from the Idaho side. Attempts by the Madison District Ranger to close the area to snowmobiles were overruled by the Forest Supervisor. In contrast, snowmobiling was prohibited in the adjacent BLM Centennials RW. In 2002, the responsible BLM Field Manager wrote a letter to the BDNF requesting the closure of the USFS portion of the RW in order to curtail illegal trespass. His request was ignored.

When the BDNF revised its Forest Plan in 2009, the already-small Mt. Jefferson RW was cleaved in half 2,000 acres in the upper reaches of the Hellroaring Creek drainage were stripped of their recommendations, leaving only a 2,000-acre RWA in the lower-reaches of the valley.

#### *Beaverhead-Deerlodge National Forest: West Big Hole Recommended Wilderness*

Approximately 56,000 acres of the approximately 130,000-acre West Big Hole Inventoried Roadless Area, on the east slope of the Beaverhead Range west of the towns of Wisdom and Jackson, MT, was an RWA in the BDNF's 1980s-era Forest Plan. Crowned by 10,620 ft. Homer Youngs Peak, the West Big Hole is a key link in the chain of wild areas that connect the Greater Yellowstone Ecosystem with Central Idaho wildlands including the Frank Church-River of No Return and Selway-Bitterroot Wildernesses. The previous BDNF Forest Plan allowed snowmobiling in RWAs, and when snowmobile technology improved in the 1990s, the West Big Hole became a popular high-marking playground. When the BDNF released its revised Forest Plan in 2009, all of the West Big Hole had its RWA status removed.

*Beaverhead-Deerlodge National Forest: Anaconda-Pintler Wilderness Recommended Inclusions (Sullivan and Tenmile Creeks)*

The 1980s BDNF Forest Plan put Sullivan and Tenmile Creeks in Recommended Wilderness status as additions to the Anaconda-Pintler Wilderness. At the southeastern end of the Anaconda Range, these drainages harbor ancient, gnarled, 800-year-old subalpine larches that are among the oldest trees in Montana. Just as with the cases of the West Big Hole and Mt Jefferson, snowmobiles were allowed in this RWA. When technology improved enough to allow access into this rugged high country, recreation became popular enough that the BDNF removed the area's recommendation for wilderness when it revised its Forest Plan in 2009.

*Kootenai National Forest (KNF): Ten Lakes Recommended Wilderness*

The Ten Lakes area is a critical area for grizzly bears and other rare wildlife that sits across the North Fork Flathead River valley from Glacier National Park. The Ten Lakes Wilderness Study Area (WSA) was designated by Congress as part of the Montana Wilderness Study Act of 1977. The 1980s-era KNF Plan included just two Recommended Wildernesses, including the Ten Lakes recommended Wilderness (34,000-acres). As with other forests such as the BDNF, the KNF allowed biking to establish and snowmobile use to persist and increase over the three decades of the Forest Plan. Thus, when the KNF revised its plan in 2015, a no-action alternative was selected that did not include the previous recommended Wilderness lands adjacent to the WSA (6,800-acres). As a result, 26,000-acres is currently recommended Wilderness until travel planning is complete, and the adjacent 6,800-acres that was previously recommended for Wilderness has been completely dropped from protection. Meanwhile, travel planning for this area has been in draft form for nearly eight years. This case represents a severing of wild land protection based on clear non-conforming use mismanagement. In the end, Wilderness character, recommended wilderness allocations, and the potential for designation has been degraded.

Custer Gallatin National Forest: Lionhead Recommended Wilderness

The CGNF can also examine the Lionhead RWA for another example of non-conforming use in a Recommended Wilderness. The Lionhead Recommended Wilderness, roughly 22,800 acres, was recommended in the 1987 Forest Plan and has been in most statewide wilderness legislation since 1988. This landscape acts as a critical wildlife corridor connecting the Greater Yellowstone Ecosystem to the High Divide.

Page 25 of the specialist report for Designated Areas Report states:

*“However, consistent with the forest plans and travel plan some of these areas have allowable ongoing motorized or mechanized use and commercial uses such as outfitting and guiding or commercial filming. Others have received little to no use, such as Lost Water Canyon in the Pryors. Mountain bike and motorized users have identified many of these areas, such as Lionhead, as important locations to consider for*

*non-wilderness-based recreational pursuits. Conversely, many wilderness and quiet users have also identified these areas as natural priorities for addition to the National Wilderness Preservation System. While the forest plan will not address route- or area-specific travel designations, the broad stage set for management of these areas during revision may help clarify future travel conversations."*

The 2006 Travel Management Plan decision stated that the Gallatin National Forest believed the Lionhead Recommended Wilderness should be closed to mountain biking but postponed making the decision due to the absence of opportunity for the public to weigh in on that decision in the Draft Environmental Impact Statement. While the Gallatin NF did offer the public an opportunity to comment on this decision, it never issued a final decision. The recommended wilderness remains open to mechanized use, which the specialist report above says is consistent with the current forest plan. We believe this is inconsistent with the 2012 planning rule and compromises the social characteristics that preserve wilderness character. The specialist report confirms this acknowledging the potential conflict between motorized and mechanized users and wilderness and quiet users. This case study points to a clear need for change to "help clarify future travel conversations," but also to maintain suitability for inclusion in the NWPS.

As outlined in each of the case studies above, recommending areas for wilderness designation, then managing them in a way that reduces the ecological or social characteristics of wilderness can compromise an area's potential for inclusion into the National Wilderness Preservation System and is out-of-step with the 2012 Planning Rule, 2015 Forest Service Manual Directives and 2008 Region 1 guidance. Non-conforming uses, such as mountain bikes, affect the social character of these wild places that recommended wilderness is intended to protect. Visitors of wilderness are intended to have an opportunity for a remote experience. In identifying lands deserving of wilderness protection, the CGNF should support its own recommendations by discontinuing all uses that are inconsistent with that designation. Failing to do so weakens an area's suitability and puts the potential for legislative protection at risk.

#### **Custer Gallatin NF – suitability, standards and guidelines that maintain desired conditions**

*Need to Change: There is a need to change standards within the forest plan in order to maintain the desired conditions for RWAs.*

From the case studies above, and from other work around the state, we agree with the need to change for certain required plan components, especially plan standards. Standards are a mandatory constraint on decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. Inevitable changing technology and increasing recreation pressures over the life of a forest plan



emphasize the need for standards that maintain the desired condition of RWAs.

Please consider these examples of unambiguous standards that fully retain wilderness character and potential of RWAs while waiting on Congress to act from other Montana forests.

Beaverhead-Deerlodge NF, Forest Plan Final ROD, p. 29-33

*Standard 13:* Wheeled or motorized vehicles designed for the primary purpose of transporting people, except for wheel chairs, are prohibited in recommended Wilderness except for permitted or administrative uses.

Kootenai National Forest, Forest Plan Final ROD, p. 46-47

*MA1b—Recommended Wilderness* These areas are recommended as additions to the National Wilderness Preservation System. This MA represents approximately 16 percent of the Inventoried Roadless Areas. For each recommended wilderness, the wilderness character and potential for the area to be included in the National Wilderness Preservation System remain intact until Congressional action is taken.

*Standards:* MA1b-STD-AR-01. Motor vehicle use is not allowed.

MA1b-STD-AR-02. Mechanized use is not allowed (e.g., mountain bikes and other wheeled equipment).

### **Increased public participation in the wilderness evaluation process**

*Need to change: Increased opportunities for public input throughout each phase of the wilderness evaluation and greater transparency on the agency's part.*

The 2012 Planning Rule requires forests to conduct a wilderness evaluation as part of the planning process. Under the planning rule, there is a need for change regarding the process for inventorying and evaluating wilderness character.

The role of public participation in plan revisions is a notable difference between the 1982 and 2012 planning rules. During the wilderness evaluation specifically, public participation is required in *each* step of the planning process (wilderness inventory, evaluation, analysis and recommendation). The Forest Service Handbook states that the agency must, “engage the public and other governments early and throughout the process to provide feedback and input on the inventory, evaluation, analysis, and recommendation steps identified in this chapter.”<sup>8</sup> The public should be engaged in each step of the wilderness evaluation *prior* to the agency moving to the next step of the process. This allows for meaningful participation in this process. Given this new requirement for public participation, there is a need to change the process for the wilderness inventory, evaluation, analysis and recommendation component of the forest plan.

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<sup>8</sup> FSH 1909.12, chapter 70, section 61

Given this requirement, attached you will find Field Measures of Wilderness Character for the field seasons of 2015 and 2016. These reports detail wilderness character inventories conducted by MWA within the CGNF.

### **Custer Gallatin NF – Consolidation of public land via land exchanges**

We agree that there is a need for change to address gaps in the current plan where lands were exchanged and acquired since the mid-1980s. As stated in the Specialist Report for Draft Land Status and Ownership, Land Uses, and Access Patterns, the national forest acquired or consolidated roughly 100,000 acres of public land within the forest boundary resolving the checkerboard ownership pattern.

Many of the acres acquired since the current forest plan are in, or adjacent to, the Hyalite Porcupine Buffalo Horn Wilderness Study Area (WSA). Within the WSA, 37,000 acres were acquired since the current plans were adopted, prompting a need for a change in management. These lands in the Gallatin Range were acquired through legislation in which Congress found “the land north of Yellowstone National Park possesses outstanding natural characteristics and wildlife habitats that make the land a valuable addition to the National Forest System;”<sup>9</sup> and that the acres within the WSA “shall be managed to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System...”<sup>10</sup>

These acquisitions removed the main barrier documented in the Gallatin NF’s “Hyalite-Porcupine-Buffalo Horn Wilderness Study Area Character Assessment.”<sup>11</sup> We believe that the need for change in management direction should bear in mind the intent of Congress captured in the both PL 105-267 and PL 103-91 and acknowledge that the main barrier to recommending the WSA for wilderness has been removed through these two land consolidations.

### **Recreation economy/economy of protected landscapes**

*Need to change: The studied economic value of outdoor recreation, specifically the economic benefit protected landscapes provide communities, creates a need to change the management of the forest to preserve these economic assets.*

Much has changed since the 1986 and 1987 plans were created for the Custer and Gallatin National Forests. Communities surrounding the forest are rapidly growing, and the economies of these communities are also changing. Headwaters Economics has produced several compelling studies<sup>12</sup> that detail the economic impact protected lands have on nearby communities.

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<sup>9</sup> Public Law 105-267

<sup>10</sup> Public Law 103-91

<sup>11</sup> Schlenker, Kimberly. 2003. Hyalite Porcupine Buffalo Horn Wilderness Study Area Character Assessment. Gallatin National Forest

<sup>12</sup> Headwaters Economics, 2016. Protected Lands and Economics: A Summary of Research and Careful Analysis on the Economic Impact of Protected Federal Lands

A couple examples of the benefit of protected lands from peer-reviewed literature cited within Headwaters Economics' study show:

- Protected public lands can and do play an important role stimulating economic growth—especially when combined with access to markets and an educated workforce—and are associated with some of the fastest growing communities in the West (Rasker 2006).
- Wilderness designation enhances nearby private property value (Phillips 2004).
- While Wilderness recreation benefits to local communities are modest, the presence of Wilderness appears to draw residents and new economic activity, and has a substantial positive impact on local economies (Rudzitis and Johnson 2000).
- A study of 250 non-metro counties in the Rocky Mountains found no evidence of job losses associated with Wilderness and no evidence that local economies more dependent on logging, mining, and oil and gas suffered job losses as a result of Wilderness designation (Duffy-Deno 1998.)

The Outdoor Industry Association's 2013 study discovered that the United State's outdoor recreation economy generates \$646 billion in direct consumer spending and 6.1 millions jobs annually.<sup>13</sup> Specifically in Montana, the same study revealed that outdoor recreation generates \$5.8 billion in direct consumer spending and 64,400 jobs.<sup>14</sup> OIA's report shows how critical our outdoor economy is, and the Assessment should acknowledge the importance of this sustainable industry.

The revised forest plan should also consider data regarding the value of the outdoor economy and the economic value protected lands provide.

### **Custer Gallatin NF – 2016 recommended CDT plan components**

*Need to change: The CDT Management within the CGNF must comply with the CDNST Comprehensive Plan.*

We agree with the need to change “direction for management of 12 designated national recreation trails, the Continental Divide National Scenic Trail and the historic Nez Perce Trail and Bannock Trail,” found on page 9 of the Preliminary Need to Change.

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<sup>13</sup> Outdoor Industry Association. “The Outdoor Recreation Economy.” 2012.

<sup>14</sup> Outdoor Industry Association. “The Outdoor Recreation Economy: Take it outside for Monana Jobs and Strong Economy,” [https://outdoorindustry.org/images/ore\\_reports/MT-montana-outdoorrecreationeconomy-oia.pdf](https://outdoorindustry.org/images/ore_reports/MT-montana-outdoorrecreationeconomy-oia.pdf).

## Continental Divide National Scenic Trail (CDT)

The Montana Wilderness Association has been involved in designation and management of the CDT since 1972. For the last five years, MWA through its CDT-Montana program, has partnered with the U S Forest Service, BLM and National Park Service to complete 60 volunteer projects on the northern CDT between Yellowstone and Glacier National Parks. CDT-Montana volunteer trail projects have included several in recommended wilderness on the Hebgen Lake Ranger District.

In 2016, the U.S. Forest Service published the Continental Divide National Scenic Trail Recommended Forest Plan Components to “ensure the conservation of the CDT’s nationally significant scenic, historic, natural and cultural resources, and to maximize its intended recreation opportunities, the trail’s entire length, together with its corridor protecting sufficient land area on both sides to safeguard and preserve wild lands, remoteness and scenic character, should be publically owned, permanently protected, and managed as a continuous entity across jurisdictions.”<sup>15</sup> These forest plan recommendations include trail-wide desired conditions, objectives, standards and guidelines to ensure that the CDTNST is managed to provide for its nature and purposes and to meet certain conditions including:

*The CDT provides for high-quality hiking and horseback riding opportunities, and other compatible non-motorized trail uses, in a highly scenic, naturally appearing setting along the Continental Divide. The significant scenic, historic, natural and cultural qualities of the trail corridor are conserved... Wild and remote, backcountry segments of the route provide outstanding opportunities for solitude, immersion in natural landscapes and primitive outdoor recreation.*

It is important that the Forest Plan comply with the National Trails System Act provisions as shown in the CDNST Comprehensive Plan,<sup>16</sup> FSM 2353,<sup>17</sup> and FSH 1909.12<sup>18</sup> policy direction.

On the CGNF, the CDT traverses the Lionhead Recommended Wilderness, an area where wilderness character and potential must to be protected. Despite completing the public comment period for travel management planning for the Lionhead Recommended Wilderness, the Gallatin National Forest chose to not make a final decision.

Protection of recommended wilderness is consistent with the nature and purposes of the CDT. While mechanized transport (bicycles, hang gliders, etc.) may be allowed on some CDT segments, mechanized transport is clearly incompatible with protection of remoteness, solitude, primitive character, designation potential within CDT recommended wilderness.

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<sup>15</sup> National Trails System Act, PL 90-543, E.O. 13195

<sup>16</sup> 2009 Continental Divide National Scenic Trail Comprehensive Plan

<sup>17</sup> FSM 2353

<sup>18</sup> FSH 1901.12

The Great Divide Mountain Bike Route provides a popular continuous bike trail between Canada and Mexico. The CDT was designated in 1978, with nature and purposes distinct from the Great Divide Mountain Bike Trail, including areas where solitude, remoteness and wilderness values are fully protected from uses that may diminish wilderness character and potential.

### **The Pryor Mountain Landscape Area**

*Need to Change: A landscape-based approach for management is needed for the Pryor Mountains that accounts for and considers the management prescriptions of the adjacent agencies sharing management of the Pryors.*

We are pleased to see the Pryor Mountains appropriately designated as a distinct “Landscape Area” for this assessment. The Pryor Mountains are one of the most geologically and biologically diverse landscapes on the CGNF. This uniqueness, including the cultural significance to Native Americans, makes it an appropriate decision to recognize this area as a distinct landscape.

However, the Pryor Mountains landscape is currently managed across multiple public, private, and tribal jurisdictions creating a significant challenge for the Forest Service. With this in mind, a holistic approach for management of the Pryors is needed in order to conserve this landscape in a way that the unique and diverse area deserves. We urge the Forest Service to work closely with neighboring agencies and their cross-boundary management objectives to create a cohesive and comprehensive management plan for this landscape.

Since the current forest plan was adopted, the Bureau of Land Management (BLM) has issued a new Resource Management Plan (2015)<sup>19</sup> for areas adjacent to the Pryor Landscape Area. This plan designated 11,504 acres as Lands with Wilderness Characteristics. Those acres are in addition to the 21,795 acres included in three BLM Wilderness Study Areas. The National Park Service has also recommended 7,975 acres of the Big Horn Canyon Nation Recreation Area for wilderness in its General Management Plan.<sup>20</sup> That totals over 41,000 adjacent acres managed specifically to preserve their wilderness character. We ask that the CGNF recognize, and account for, the management plans and prescriptions of adjacent agencies in the planning process.

On behalf of MWA, we thank you for offering us the opportunity to provide feedback on this important phase of the planning process. We look forward to continuing our work with you throughout the process. Again, please do not hesitate to contact us at anytime.

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[https://www.blm.gov/style/medialib/blm/mt/field\\_offices/billings/rmp/prmp\\_feis.Par.43640.File.dat/FINAL%20BiFO%20ARTSD.pdf](https://www.blm.gov/style/medialib/blm/mt/field_offices/billings/rmp/prmp_feis.Par.43640.File.dat/FINAL%20BiFO%20ARTSD.pdf)

<sup>20</sup> <https://www.nps.gov/bica/learn/management/upload/gmp-1980.pdf>

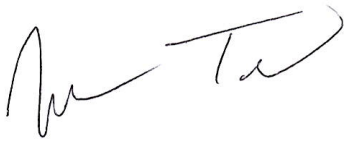
Best,

A handwritten signature in black ink that reads "Sally Cathey". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Sally Cathey  
Southwest Montana Field Director

A handwritten signature in black ink that reads "Charlie Smillie". The script is cursive, with the first name being more prominent than the last.

Charlie Smillie  
Eastern Montana Field Director

A handwritten signature in black ink that reads "John Todd". The script is cursive, with the first name being more prominent than the last.

John Todd  
Conservation Director