

Virginia Kelly
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Custer Gallatin National Forest
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Re: Custer Gallatin National Forest Draft Revised Forest Plan and DEIS

Dear Virginia:

Thank you for the opportunity to comment and contribute to the Draft Revised Forest Plan and corresponding Draft Environmental Impact Statement for the Custer Gallatin National Forest (CGNF). This is truly a once-in-a-generation opportunity.

Background

I was born and raised in Big Timber, Montana. My family has been part of the East Rosebud Lake Association since its formation. During the eventful summer of 1988, I rebuilt the Upside Down Creek Trail for the then-Big Timber District of the Gallatin National Forest (I was offered a Wilderness job on Lake Plateau the following season but went to work in the Yukon instead). For two summers, I worked for the original Stillwater Mine near Nye. I've worked as a legitimate climbing guide in the Tetons, Hyalite & Gallatin Canyons and on Granite Peak. My career as the local sales rep for Patagonia (1998-2003) took me to every community in the region where I intersected with recreationists and businesses of all stripes. Since 2004 I have written or published no less than eight guidebooks or maps to climbing, hiking, skiing and recreation to areas in the Custer Gallatin including Hyalite, Big Sky area, the Absaroka-Beartooths including Granite Peak, Montana's highest point. During the 2003-06 Travel Planning Management process I was a board member for the Southwest Montana Climbers' Coalition that were instrumental in helping negotiate winter road plowing for Hyalite Canyon. For this work in 2009, I was awarded the national "Reece Martin Regional Organizer of the Year Award" by the Access Fund in recognition for my significant contributions to climbing access. In 2010 I founded Friends of Hyalite and in 2018 the Ice Climbing Alliance. Both are 501c3 non-profit organizations that work directly with the Bozeman Ranger District through stewardship projects and a special use permit for the Bozeman Ice Climbing Festival, the largest event of its kind in North America, and which I was Festival Director for 12 years. For three years I pioneered a friendly-fencing program in Paradise Valley that has since contributed to a dramatic expansion of pronghorn populations and habitat in the valley. For the last six plus years I have worked for the Greater Yellowstone Coalition (GYC) as the Montana Conservation Associate. My work with GYC has entailed commenting on a wide range of NEPA projects, co-chair of the Gallatin Community Collaborative and more recently leading a large coalition of businesses and NGOs around the Emigrant-Crevice Mineral Withdrawals.

It is with this wide-ranging and deep background I submit these personal comments. These reflect only my views and not those of my employer, Greater Yellowstone Coalition. Thank you for considering these comments in your final analysis and upcoming record of decision.

Alternatives

Generally, my comments do not advocate directly for one alternative over another. Rather they choose pieces *ala carte* from across the alternatives that I believe best protect the waters, habitat, recreation and other socio-economic benefits we derive from forest management.

Gallatin Forest Partnership

When the Gallatin Community Collaborative (GCC) was being formed in 2012, the courts had only recently resolved the last of the lawsuits around the Travel Management Plan, the subsequent time-share negotiations were complete, and the winter and summer interim orders were developed to manage the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA). This outcome was largely touted by most in the conservation community. Although it may not have been perfect nor been in complete conformity with the 1977 Montana Wilderness Study Act, it was a workable solution that I believe has generally held up to the test of time despite the increased urban growth and recreational demands that are taxing the forest at every level. I believe the Gallatin Forest Partnership (GFP) recommendations for the Forest Plan best represents the intent and conditions provided by the court-ordered use and interim orders for travel planning in the Gallatin Range. Furthermore, the GFP takes into consideration the important watershed concerns for Bozeman with special designations for the entire Hyalite and Bozeman Creek drainages. This is particularly critical in the face of urban populations and recreational demands across the forest but particularly in the front country and high-value destinations. To be clear, there are areas across the Gallatin Range where recreation and growth pressures present tremendous challenges. But a balance must be found to build resilience to the growth pressures, realities and expectations that come with changing demographics and climate. With this in mind:

I endorse the Gallatin Forest Partnership and recommend the Final Forest Plan adopt all aspects of the GFP proposal.

Existing Wilderness

I believe it is critical the Forest fully consider the management requirements and issues that need to be addressed in the Forest Plan for existing Wilderness, despite the large amount of regulatory framework already in place. I have spent my entire life exploring the Absaroka-Beartooth Wilderness and before that, the Beartooth Primitive Area. More recently, I spend considerable time in all four units of the Lee Metcalf Wilderness.

As such, I find it disturbing there are no alternatives being considered for the Wilderness management direction for either of these two internationally important designated Wilderness areas. It is critical the Forest Plan provide an overarching architecture for Wilderness management to ensure that Wilderness character is maintained or enhanced.

I recommend the Final Forest Plan include direct language pertaining to the five qualities of Wilderness. The current plan lacks discrete Standards to address unique zones within these large Wilderness areas. The high-level Desired Conditions, Standards, Goals, Objectives and Guidelines for Wilderness in general to not adequately address the succinct and unique management needs across the diversity of Wilderness found in the Custer Gallatin. See my Granite Peak comments below as just one example of a unique resource found within designated Wilderness.

Since the current (and very outdated) management plans for both Wilderness areas will be replaced by this new Forest Plan, it must be robust enough to provide appropriate guidance to protect Wilderness character. The management plans for these two Wilderness areas date back to 1987 and were done under obsolete planning rules. Without specific direction in this Forest Plan to develop clear and unambiguous, measurable Standards that measure change to Wilderness character, these resources are

“hung out to dry” and will fall victim to any number of known and unforeseen challenges related to internal capacity, political pressures, and funding. Neither the forest nor the public will have a definitive contract that clearly lays out unambiguous and articulate strategies and timelines for maintaining or improving Wilderness character. This is entirely unacceptable.

There must be concrete objectives included to complete updated Absaroka-Beartooth and Lee Metcalf Wilderness Management Plans within 2 years of the Forest Plan revision.

Many areas within designated Wilderness still see considerable impacts and threatened Wilderness character. This is why the Zone designations for Wilderness are so important. Without clear Standards attached to key zones, particularly Zone 1 which is the most pristine zone, these areas will be threatened.

The Forest Plan needs a stand-alone Standard that clearly states, No new system trails within Zone 1 Wilderness.

Under the context of the current Wilderness Act, the Suitability section 116 refers to the lack of suitability for motorized and mechanized travel in Wilderness. Yet Wilderness designation is a political creature. Although it remains, arguably, our strongest protection for land and water it remains exposed to changes from Congress. The Forest needs to be pre-emptive in addressing future management needs that are reasonably foreseeable.

I recommend a stand-alone Standard that prohibits bicycles in any designated Wilderness.

Granite Peak, Montana’s Highest Point

Since Granite Peak is deep within the Absaroka-Beartooth Wilderness it enjoys a certain level of protection from the Wilderness Act and associated regulations for camping, etc. However, as Montana’s highest point, the area receives an extra-ordinary amount of pressure and subsequent impacts. The goals and desired conditions set forth in the Draft Forest Plan for Recreational Emphasis Areas are not appropriate for Granite Peak and its Wilderness setting, however, some acknowledgement of the special management needs surrounding Granite Peak is recommended.

In 2006, my company First Ascent Press, LLC published a “Climbing Guide and Map to Granite Peak” that specifically left out climbing routes on the Southwest Face via Sky Top Creek. The intention was to limit encouragement of camping and use in the fragile Sky Top drainage. The impacts on the Froze-to-Death Plateau and around Avalanche Lake are proof of what the demand for Montana’s highest point can do. The areas around Rough Lake and Elk Lake to the south have already seen considerable impacts from fishermen yet the upper Sky Top drainage has largely remained pristine but this could change quickly. Another intention to not include this information in the 2006 map is that the climbing routes are subject to variable and rapidly changing conditions and are not suitable for multiple parties at a time, despite being somewhat “less technical” than the standard East Ridge. Unfortunately, misleading internet reports from “high-pointers” has led to an increase in interest from the Southwest. In order to better educate the public about potential impacts and to set proper expectations among Granite Peak aspirants, Beartooth Mountain Guides and I included these routes in an updated version of our map published in 2018.

I recommend some designation or acknowledgement of the unique situation presented by Granite Peak as Montana's highest point, and the subsequent recreational pressures put on all sides of the peak, to ensure the Wilderness character is maintained or enhanced and it is properly managed as a Zone 1 Wilderness. The cumulative impacts of Granite Peak directly impact three key drainages of the Absaroka Beartooth Wilderness – East Rosebud, West Rosebud and Sky Top. A goal of this inclusion would be to provide district managers the direction they require and the tools they may need to better manage this resource and their ability to respond to changing recreational pressures. Desired Conditions would be to maintain the Wilderness character of all sides of the mountain. Standards should be set for water quality. There should be a Standard for no new system trails in the area around Granite Peak. Standards could be established for designated camping areas within a reasonable area surrounding Granite Peak. Goals should consider the number of guiding permits and the routes are available, or not available, for commercial activity. Desired Conditions could include similar educational programs found under REAs but to be included at trailheads (outside the Wilderness), particularly the rustic and un-developed "Lady of the Lake" Trail #31 which has potential conflict with a private land in-holding.

It is incumbent on the Forest Planning process to predict and prepare for future demands on all of its resources. Make no mistake, Granite Peak, as Montana's highest point, and its location within the Absaroka Beartooth Wilderness, is a "resource" and should be acknowledged and addressed.

Recommended Wilderness

The inventories for Roadless Areas (IRA) that occurred in the Clinton administration provide a good baseline from which to consider future Recommended Wilderness Areas but those processes were, at times, imperfect. For example, much of the South Cottonwood drainage in the norther Gallatin Range was excluded due simply to a lack of access. Conversely, the presence of old logging road such as those found on Green Mountain near the Chico Peak IRA could be restored and enhanced to qualify for Wilderness. Thus, my recommendations for additions to RWA do not simply follow established boundaries resulting from various imperfect processes. Resiliency in the face of urban growth, water needs, recreational demands and climate change require a more detailed analysis.

In addition to the Recommended Wilderness areas suggested in the Gallatin Forest Partnership, I recommended the Forest Plan Recommend the following Wilderness Areas:

Include the Chico Peak, Emigrant Peak and Dome Mountain areas as defined and called for by the Outdoor Alliance Montana.

Include the East Rosebud to the Stillwater area as defined in Alternative D.

Indigenous Cultures

The Draft Forest Plan is missing a considerable opportunity to address the fact that Indigenous cultures have been using and managing this entire landscape long before the Forest Service existed. I do not know enough to comment on all the issues and intersections this plan should have with that of indigenous cultures. That said, the Crazy Mountain are an area that is generally more widely known. I grew up in the shadow of the Crazy Mountains and understand the immeasurable cultural and traditional value this range holds for the Apsaalooke people. I also know and understand the values held by the local landowners and ranchers who hold a more recent rights to the checkerboard private lands.

Despite the challenges this poses for access and management, the Crazy Mountains continues to be recognized as one of the most sacred places in Apsaalooke homeland. Yet promises made by the US Forest Service to the Apsaalooke Tribal members to amend the 1987 forest plan to recognize the cultural, historic and spiritual qualities of the Crazy Mountains remain unfulfilled.

I stand with the Apsaalooke in asking for Desired Conditions that do NOT allow expanded mechanized or motorized travel, mining, building of new roads, utility corridors, or development of new recreation sites of facilities in the Crazy Mountains.

Non-Conforming Uses

For years, the Region 1 has been a mixed bag in regards to the uses allowed in Recommended Wilderness. This “non-conforming use” question has been the source of years of acrimony within the community. This Forest Plan needs to show leadership and can go a long ways to giving the community the certainty it desperately requires on this issue.

I recommend the Desired Condition that stipulates, Non-conforming uses (those not normally allowed under the Wilderness Act) such as motorized and mechanized activities are NOT allowed in Recommended Wilderness Areas (RWA) and to the extent already provided under Travel Management Planning or other special designations in the Forest Plan, are NOT allowed in Wilderness Study Areas (WSA).

Wild & Scenic Rivers

I am one of five generations of my family that has the unique privilege to grow up and enjoy property at East Rosebud Lake. I fully supported the recent designation of the East Rosebud as Wild & Scenic.

The Forest Plan should include a time-bound Standard that calls for an updated management plan for the East Rosebud Wild & Scenic River.

I appreciate the Draft Plan’s consideration of 30 rivers and stream to be recommended as Eligible Wild & Scenic. However, I believe there are several that are left out and should also be included. There are multiple outstandingly remarkable values (ORV) in all of these drainages but the wildlife ORV stands out including migratory ungulates, sensitive species such as grizzly bear, wolverine, and cutthroat trout.

I encourage including the following rivers to the list of Recommended Eligible Wild & Scenic inventory: Taylor Fork of Gallatin River (including Alp and Lightning Creeks), South Fork of the Madison River, Hellroaring Creek and Davis Creek.

Special Designated Areas

As Founder and Executive Director of Friends of Hyalite from 2010-2017, our group partnered with Montana State University in 2012 to commission a Winter Road Use Survey for Hyalite Canyon. This study showed the wide range of users interested in Hyalite and expanded greatly the numbers that were believed to be using the canyon. Previous estimates were at 30,000 visitors for the entire winter where our study indicated upwards of 20,000 per month. Anecdotal vehicle counts in the years since have indicated a 10-15% increase each year. This is just one example of the growing mountain of evidence and experience regarding the extreme recreation pressures being put on the entire forest but focused heavily in front-country areas near population centers like Bozeman. The Forest Plan is a rare

opportunity to provide future management direction that contributes resilience to current and future demands in the face of continued growth and climate change,

For these reasons I support the creation of Recreation Emphasis Areas (REA). I recommend all eight of the REAs included in Alternative C. In particular, I support the Hyalite Recreation Emphasis Area as found in Alternative C (65,638 acres) as it includes the municipal watershed of Bozeman Creek.

The West Fork of Rock Creek is already popular for people living in communities in that region including Billings, Red Lodge and Cody, WY. This can be expected to only increase over time and an REA designation will help forest managers throughout the life of the plan. The challenges of parking, human and dog waste management at the popular M-Trail near Bozeman is already pushed to the limit. The M is a serious vector for an ever-expanding collection of noxious weeds pushing themselves further and further into the Bridger Range. I further recommend the forest adopt the following Alternative E REA's:

I suggest adding the West Fork of Rock Creek (9,559 acres) and the M-Trail (148 acres) as Recreation Emphasis Areas as found under Alternative E.

Furthermore, I suggest the addition of another Recreation Emphasis Area for all three forks of the Mill Creek drainage.

As population grows and recreational demands increase for public lands just outside of Yellowstone National Park, the Mill Creek drainage will continue to see more and more pressure. Not unlike Hyalite Canyon that required additional management considerations, infrastructure and even outside support from Friends groups, in order to keep up with the various demands and impacts, we can project that valleys like Mill Creek - with established roads, multiple uses including motorized and mechanized, unique recreation opportunities and access to Wilderness and waterfalls – will continue to see growth in recreational demand. Direction from the Forest Plan will provide the guidance needed to adequately manage for future conditions and provide the flexibility to address infrastructure and other needs.

Energy and Minerals

I understand there is a considerable regulatory framework around management of both leasable and locatable minerals and energy. With that in mind, that is exactly why the Forest Plan should go out of its way to retain as much discretionary control over the resources it is responsible for. In addition, clarity and unambiguity is what the forest, the public and even the industry requires.

Considering the vast public interest (at all levels from local, to state, to Congress, to the Administration) and the comments generated I am shocked at how little the Draft Forest Plan addresses Standards, Desired Conditions or monitoring question related to Energy and Minerals. Furthermore, all but one alternative propose a special 102,000+ acre "Stillwater Land Allocation" that specifically calls out the existence of the Stillwater Complex (SWC) and the tremendous resource values this provides.

I generally agree with this assessment and the value the SWC provides to the local communities (of which I am a part) and the strategic and industrial needs of the nation. I don't understand, however, what the special Land Allocation in the Forest Plan does. On one hand, the Draft Forest Plan goes to great lengths to list the regulatory framework and largely takes the stance that Energy and Minerals development is inevitable, if not compelled.

I encourage the Forest Plan to clearly state what management direction a "Stillwater Land Allocation" provides that is above and beyond the existing regulatory framework. If there is no added management provided, it should be dropped.

There is perception in local communities that Alternative D (the only one not including the Stillwater Land Allocation) is meant to stop mining in the SWC. I know this is not the case and even Stillwater-Sibayne is not necessarily opposed to Alternative D as long as their existing mineral rights are protected. It is unfortunate the Draft Forest Plan includes the ambiguous land allocation with no clear goal or standard attached.

In light of the consistent emphasis on the regulatory framework for which they must operate ("Our hands are tied") under the General Mining Law of 1872 and a noticeable lack of any unique standards or guidelines, The Stillwater Land Allocation appears to be little more than a special call out to the mining industry by the Forest Service. If the Forest is willing for such special recognition, I argue that the same should be made for the New World, Emigrant and Crevice mineral withdrawals. Each of these areas fall under a strict regulator framework and each saw noticeable public comment and attention at both local and national levels. Considering the unique wildlife, scenic, recreational and water values these withdrawals are meant to protect, it only follows that Forest Plan should include guidance for future managers on who to consider the cumulative impacts for other non-mining projects or mining on private land in these areas.

I encourage Standards be developed for the New World, Crevice and Emigrant mineral withdrawal areas that address all management activities, including special use permits, within these high priority and clearly defined areas. These can include goals and monitoring questions regarding consultation with relevant agencies and standards that explicitly state the areas are withdrawn from mineral entry, subject to valid existing rights as determined by the accepted process.

In general, both the public and the industry require clarity and certainty in energy and minerals development. The Draft Forest Plan does not provide that clarity. Desired Conditions, Standards, Goals, Objectives and Guidelines MUST be developed to provide the guidance required for adequate project proposals and responsible energy and minerals development balance properly with other resource values.

Thank you for the opportunity to comment.

Respectfully submitted,

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