

# The Summit Lighthouse and Church Universal and Triumphant

## OFFICE OF THE PRESIDENT

June 5, 2019

Custer Gallatin National Forest  
Attn: Forest Plan Revision Team  
P.O. Box 130 (10 E Babcock)  
Bozeman, MT 59771

**RE: Comment on Draft Revised Forest Plan Custer Gallatin National Forest**

Dear Forest Plan Revision Team:

This is to add to our comment submitted in the previous comment period.

Regarding Wild and Scenic Rivers (WSR) eligibility for the Yellowstone River, the Draft EIS states “*As this river eligibility study does not apply to privately owned lands, there are no direct effects on those lands.*” Indirect impacts to privately owned lands, however, promise to be significant, including through local zoning as encouraged under WSR to further its purposes. We believe a Suitability Study is needed as a part of this Forest Plan, which may well result in a finding that the Yellowstone River is not suitable for WSR designation:

1. The geographic narrowness of the Gardiner Basin heightens the impact of the initial WSR ¼-mile river boundary, encompassing nearly all existing occupied and developable lands north of Gardiner.
2. WSR designation has the potential to inhibit the recreational, tourism and other economic activities of Park County and the State of Montana by limiting future growth of the Gardiner Basin—services needed to support public enjoyment of the land. It may have the effect of moving development growth north of Yankee Jim Canyon. Although it’s argued that WSR designation may help the economy by fostering the attraction of a unique and special place, this area along the Yellowstone River we must agree is already such an attraction. We need to support and not restrict the small businesses and vendors that make visiting this area possible and the pleasure that it is.
3. WSR designation will likely impact the ability of the Gardiner Basin to support visitors of YNP.
4. One of the primary goals of the WSR Act is to maintain a free-flowing river. The Yellowstone River is free-flowing and not likely ever to be dammed. It would be prohibitively expensive relative to the benefits. There are no water resource projects active or likely in the future on this stretch of river.
5. U.S. Hwy. 89 is the only road access to Gardiner and the YNP North Entrance, which continues to serve record numbers of visitors. A WSR designation could likely limit future needed transportation options such as light rail or highway improvement. Park County Commissioners have shown an interest in having the former railroad route available for emergency access in the event of blockage of US 89.
6. Given the tourism, recreation and agriculture-based economy of the Gardiner Basin, protection of Outstanding Remarkable Values (ORVs) will continue to be accomplished in partnership with private property owners dependent on the area’s conservation values for their livelihood, as they have been for some time. Recreation ORVs continue to flourish and are not threatened.
7. Benefits of WSR designation are limited relative to what may be accomplished through other means.
8. Restrictions through zoning in conjunction with WSR designation could affect Church Universal and Triumphant’s use of our land and waters that, according to our religious beliefs, we hold sacred. Disruption of land use improperly burdening our religious expression and practice would run afoul of religious freedom guarantees vouchsafed by the First Amendment to the U.S. Constitution.
9. There is a growing grassroots opposition within the Gardiner Basin and Park County to WSR designation for the Yellowstone River.

We appreciate this opportunity to comment on the referenced plan.

Sincerely,



Valerie McBride  
President