



September 8, 2020

Objection Reviewing Officer
USDA Forest Service, Northern Region
Building 26
Fort Missoula Road
Missoula, MT 59804

Submitted online at <https://cara.ecosystemmanagement.org/Public//CommentInput?Project=50185>

Re: Custer Gallatin Forest Plan Draft ROD Objection

To whom it may concern,

Objector Gallatin Forest Partnership (GFP) submits this objection to the Custer Gallatin Forest Plan revision Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS), noticed May 21, 2020. Mary Erickson, Custer Gallatin National Forest Supervisor, Responsible Official.

The GFP filed timely comments on the Proposed Action and Draft Environmental Impact Statement (Draft EIS) for this Forest Plan revision on March 5, 2018 and June 6, 2019 respectively. Our March 5, 2018 submission included the full text of the Gallatin Forest Partnership Agreement, with maps, which we requested be considered as part of one of the Alternatives in the Forest Plan Revision EIS. We were pleased to see our Agreement reflected in Alternative C, and in our DEIS comments, we provided feedback to the Forest on how to modify this alternative to better reflect our Agreement. Members of our Partnership have also met frequently with the Forest Planning Team to discuss our Agreement and details concerning the forest plan revision. We appreciate that much of this feedback was incorporated into Alternative C in the FEIS.

There are many things in the revised forest plan (2020 Plan) that we support, and we see many elements from our earlier comments reflected in the plan. We appreciate the positive acknowledgement of our work and our Partnership in the draft Record of Decision, and the many ways in which our Agreement and comments are reflected in the 2020 Plan. For example, we are pleased to see that the 2020 Plan includes a recommendation for significant new wilderness in the heart of the Gallatin Range and does not allow motorized or mechanized recreation within the recommended wilderness areas. Likewise, we appreciate that the 2020 Plan establishes the Buffalo Horn and West Pine Backcountry Areas, which protect the landscape while allowing existing recreation uses to continue.

While the 2020 Plan does reflect a great deal of the GFP Agreement, there are several aspects of the plan where we see significant divergence with our Agreement. In each case, we believe our Agreement

offers a better guide for future forest management than what is included in the 2020 Plan. Therefore, we offer the following objections and resolutions to improve the final plan:

Objections

I. THE HYALITE RECREATION EMPHASIS AREA FAILS TO LIVE UP TO THE VISION PROPOSED BY THE GALLATIN FOREST PARTNERSHIP

Hyalite Canyon is a popular recreation destination in all seasons. This recreation use is not strictly tied to Hyalite, however. Skiers, mountain bikers, hikers, and hunters all travel seamlessly from Hyalite into the neighboring Bozeman Creek and South Cottonwood drainages. Wildlife movement is similarly fluid across this larger landscape. In addition, the Hyalite and Bozeman Creek watershed, together, provide the majority of Bozeman's municipal water supply. Because of these connections, the GFP Agreement specifies a Hyalite Watershed Protection and Recreation Area that includes the South Cottonwood and Bozeman Creek drainages as well as Hyalite Canyon. This designation is described in detail starting on page 11 of the GFP Agreement, which was included with our March 2018 scoping comments. We were pleased to see our proposed Hyalite Watershed Protection and Recreation Area reflected in Alternative C in the DEIS (as the Hyalite Recreation Emphasis Area), and we offered a number of comments related to this portion of the plan on pages 4-6 of our June 2019 DEIS comments. Many of these comments have been incorporated into the 2020 plan, which we appreciate, but there is still work to do to bring the Hyalite Recreation Emphasis Area in line with the GFP Agreement.

One of our concerns with the Hyalite Recreation Emphasis Area as proposed in the DEIS was the (perhaps understandable) focus on recreation. Given the multitude of other values in Hyalite, we believe it is important that the revised forest plan carefully manage this area to manage high-density recreation use where appropriate, maintain solitude and existing wild character in the more remote parts of Hyalite (specifically those areas that fall within the Wilderness Study Area), and take necessary action to protect the watershed.

Following the submission of our DEIS comments, we met with the planning team to discuss the Hyalite Recreation Emphasis Area in more detail. Our amended suggestion was a hybrid Recreation Emphasis Area/Backcountry Area in which the developed areas in Hyalite Canyon were contained within the Recreation Emphasis Area and the more remote reaches of Hyalite (including the parts of the WSA not recommended for Wilderness), South Cottonwood, and Bozeman Creek, were classified as a Backcountry Area. This recommendation is reflected in Alternative C in the FEIS (Hyalite BCA and Hyalite REA). This approach best meets the GFP's goals for the Hyalite Watershed Protection and Recreation Area:

- To protect the Hyalite and Bozeman Creek watershed(s) to ensure a clean and reliable municipal water source for the city of Bozeman.
- To maintain and, where appropriate, enhance the existing high quality and diverse recreation experiences offered in the watershed.
- To protect the wild and remote character of the high peaks in the upper reaches of the drainage.
- To manage for stable and resilient wildlife populations.

The 2020 Plan proposes that the entire Hyalite watershed – but no portion of either South Cottonwood or Bozeman Creek – be included in the Recreation Emphasis Area. This is markedly different from what the GFP Agreement envisions for this area.

While we appreciate that MG-STD-HREA 01 prohibits new trail construction to access the wild upper reaches of Hyalite (Flanders, Mt. Bole, Divide Peak, and Maid of the Mist peaks), this one standard is not sufficient to protect the backcountry character of this area. For example, while motorized use is currently not allowed on the trail leading to Hyalite Peak and the Gallatin Crest, the semi-primitive motorized ROS setting encompassing this trail in the 2020 plan opens the door to designating this trail for motorized use in the future – an action that would surely degrade the wild character of Hyalite Peak, not to mention the Gallatin recommended wilderness. Likewise, our Agreement specifically prohibits new motorized trail development in Hyalite, but this language is not present in the 2020 Plan. It is also concerning that the FEIS presents the Alternative C prohibition on new motorized trails in the Hyalite Backcountry Area as a possible reason for not selecting this management.¹

The GFP Agreement – as depicted in Alternative C of the FEIS – envisions maintaining existing motorized use in the Hyalite Backcountry Area. Hyalite is an extremely popular and busy recreation destination, yet our proposed Backcountry Area still provides substantial opportunities for visitors to experience solitude, natural soundscapes, and adventure. It would allow current motorized access to continue but does not expand motorized use, as Hyalite is primarily a non-motorized recreation destination. To preserve quality recreation experiences for all visitors, motorized access should not be expanded in Hyalite beyond what is currently allowed. Instead, new motorized recreation opportunities should be emphasized in the nearby Storm Castle Recreation Emphasis Area. Backcountry Area management is intended to preserve the lightly developed character of these places, while Recreation Emphasis Area management is intended to emphasize recreation opportunities, often with an increase in infrastructure. A Backcountry Area designation is essential to complement the REA and maintain the highly valued current setting and visitor experiences in the upper reaches of Hyalite Canyon.

The forest-wide direction for Recreation Emphasis Areas, such as FW-SUIT-REA 01 (Recreation emphasis areas are suitable for a high density of recreation development) directly conflicts with the GFP's goal to protect the wild and remote character of the high peaks. MG-OBJ-HREA 01 (Per decade, one additional shoreline access day use area will be developed or converted from other developed recreation sites, such as campsites on the lakeshore) also raises alarms. While it may seem obvious that the lakeshore in question is Hyalite Reservoir, there are a number of lakes in Hyalite – this objective should be clarified to specify that it is only applicable to the Hyalite Reservoir lakeshore.

Furthermore, the plan provides no direction to protect the wild backcountry character of South Cottonwood or Bozeman Creek.

The 2020 Plan designates a Key Linkage Area encompassing Bozeman Creek and the National Forest lands in Bear Canyon. The Key Linkage Area designation achieves some of our goals for the Hyalite area – namely to manage for stable and resilient wildlife populations – but it does not capture nor provide management for the high recreation values within the Bozeman Creek watershed. As evidenced by the Lick Creek area, it is possible to overlay a Recreation Emphasis Area and a Key Linkage Area, and we presume the same is true for a Backcountry Area and Key Linkage Area. Therefore, it does not appear the Key Linkage Area precludes a Backcountry Area designation in Bozeman Creek.

¹ FEIS V2, page 388: “The Hyalite Backcountry Area at 46,704 acres, has plan components which would restrict new motorized trails, and new hiking trails to the high peaks listed. As a result, new motorized transport would need to be considered in other locations on or off the national forest, likely a farther distance from Bozeman’s population center.”

The 2020 Plan proposes no special designations or protections for the South Cottonwood drainage, despite the area's extremely high conservation and recreation values. Upper South Cottonwood is one of the only places within the WSA – and by far the largest and most significant – where the 2020 Plan provides no specific management direction if Congress were to change the status of the WSA. The South Cottonwood drainage is not classified as Inventoried Roadless outside of the WSA, so lacks specific protections in that regard to limit road building or other development. Furthermore, most of the South Cottonwood drainage is included with the suitable timber base in the 2020 Plan - directly exposing this wild area to a high potential for timber harvest and road building.

While the 2020 Plan sets the ROS for most of South Cottonwood at semi-primitive non-motorized, it is unclear how this can be achieved *and* meet the goals associated with South Cottonwood being included in the suitable timber base. In contrast, the Hyalite Backcountry Area designation proposed by the GFP would protect the backcountry character of this drainage, yet allow active vegetation management as needed to address wildfire hazards.² This aligns with FW-SUIT-BCA 01 in the 2020 Plan, which states that “backcountry areas are not suitable for timber production. Vegetation management, including timber harvest, is suitable for purposes such as fuels reduction, restoration, or wildlife habitat enhancement.”

One would not know from reading the 2020 Plan, how special South Cottonwood is, or how highly valued it is by Bozeman-area residents. The upper reaches of South Cottonwood provide some of the best backcountry ski terrain on the Bozeman Ranger District – including Alex Lowe Peak, named after the famed mountaineer. This terrain is almost always accessed from Hyalite Canyon in winter. Hikers, trail runners, equestrian users, and mountain bikers flock to the South Cottonwood trail in summer, and long rides, runs, and hikes linking South Cottonwood to Hyalite (and even Bozeman Creek) are especially valued. The Fox Creek Cabin is unique in the Custer Gallatin cabin rental program, as a cozy backcountry getaway. Because the entire drainage is non-motorized, South Cottonwood provides a unique backcountry experience with many opportunities for visitors to experience natural soundscapes and explore wild country. A Backcountry Area designation, as in Alternative C, will maintain this area as it is today, to be enjoyed and cherished by future generations.

Remedies:

- Include the Hyalite Backcountry Area and Hyalite Recreation Emphasis Area as described in Alternative C in the Final Plan.
- Modify MG-OBJ-HREA 01 to read “Per decade, one additional shoreline access day use area will be developed or converted from other developed recreation sites, such as campsites on the **reservoir** lakeshore”
- Include the following standard from Alternative C: “Construction and designation of new motorized trails shall not be allowed.”

II. THE 2020 PLAN FAILS TO RECOMMEND WILDERNESS FOR KEY AREAS IN THE GALLATINS AND MADISON RANGE

The GFP Agreement recommends 3 new wilderness areas or additions in the Gallatin and Madison Ranges: Cowboy Heaven, a Taylor Hilgard addition, and the Gallatin Wilderness. We describe these recommendations on pages 16-18 of the GFP Agreement, which was submitted with our scoping comments in March 2018. Our recommendations are included in Alternative C and we provided

² GFP Agreement, page 13.

additional comments related to these wilderness recommendations on pages 6-7 of our DEIS comments, submitted in June 2019.

We are pleased to see that the 2020 Plan includes our suggested Taylor Hilgard addition. While the recommended wilderness in the 2020 Plan does not fully match our proposal for this area, we understand the rationale for pulling the recommended wilderness boundary away from the road. However, we have significant concerns over how the 2020 Plan proposes to manage the other two areas we believe are worthy of wilderness recommendation. We are also concerned that the 2020 Plan applies a Semi-Primitive Non-Motorized Recreation Opportunity Spectrum (ROS) setting to recommended Wilderness areas rather than a Primitive ROS setting.

Recommended wilderness should have a primitive ROS setting. Primitive settings are “large, wild, remote, and predominately unmodified landscapes” that often provide “secure wildlife habitat, naturally appearing vegetation, [and] clean water” and they are not suitable for motorized transport.³ Likewise, in the 2020 Plan, recommended wilderness areas are managed to maintain wilderness characteristics, provide outstanding opportunities for solitude or primitive and unconfined recreation, and are characterized by a natural environment where ecological processes function as the primary forces affecting the environment.⁴ The Forest Service’s intent in recommending these areas for Wilderness is to manage them to retain their wilderness – “primitive”- characteristics and to preserve opportunities for inclusion in the National Wilderness Preservation System. This is in complete alignment with the Primitive ROS setting, which is why every other national forest that we are aware of assigns a Primitive ROS setting to recommended wilderness areas.

The Custer Gallatin’s interpretation of what a Primitive ROS setting requires – as explained on page 354 of Volume 2 of the FEIS and as described on page 91 of the 2020 Plan – is more restrictive than what is in the recently-published FSM 2300, Chapter 10 - Sustainable Recreation Planning. It appears that the Custer Gallatin is interpreting “not prevalent” to mean practically non-existent in terms of signage, but this sets a higher bar for recommended wilderness than for what is found in designated Wilderness. Indeed, if one were to hike the Gallatin Crest or any other area recommended for wilderness in this plan, they would find trails, signs and infrastructure managed to approximately the same level as in any of the areas currently designated as Wilderness on the forest. All of the designated Wilderness areas on the forest (and in Region 1) contain a maintained trail system marked by signs at junctions and other key spots. Furthermore, 2311-Exhibit 01: Physical, Managerial, and Social Characteristics for each ROS setting, in FSM 2300, Chapter 10, includes additional guidance that clearly shows that recommended wilderness areas should be classified as primitive. This is particularly evident when comparing the characteristics for primitive versus semi- primitive non-motorized settings.

Gallatin

We are pleased to see that the 2020 Plan recommends wilderness in the Gallatin Range. This is a historic moment for the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area. However, it is unclear why the 2020 Plan separates the GFP’s recommendation into two parcels – the Sawtooth Mountain and Gallatin Recommended Wilderness Areas. There is only a small area – approximately half of section 32 and the northwest corner of section 33, including a portion of Sheep Mountain – separating these two parcels and it, too, should be recommended for wilderness in the final plan. This small area is only accessible from Yellowstone National Park and recommending it for Wilderness poses no conflict with any existing

³ FW-DC-ROS 2 and 3, FW-SUIT-ROSP 1.

⁴ FW-DC-RWA 1-3

uses. We understand that there is a commercial communications site in the northwest corner of section 33, but the Gallatin Crest recommended wilderness area included in the 2020 Plan contains 3 communications sites, including commercial sites, which did not disqualify the area from wilderness recommendation. Connecting the Sawtooth and Gallatin Crest recommended wilderness areas into a single Gallatin Recommended Wilderness creates a more cohesive, and manageable area that will provide innumerable conservation benefits.

We also object to placing the boundary of the Gallatin Crest recommended wilderness area on the Hyalite Peak ridge, rather than extending this boundary to Hyalite Lake as mapped in the GFP Agreement. While we understand why the ridge is a tempting boundary, there is significant value in including all of Hyalite Peak in the recommended wilderness area. Not only does including Hyalite Peak in the recommended wilderness area hold significant value for Wilderness advocates, it will help to ensure that future Forest managers do not designate trail #427 for motorized use. Furthermore, there are no resource or recreation management conflicts that would come with extending the recommended wilderness boundary to Hyalite Lake. The boundary we describe and map in the GFP Agreement, and depicted in Alternative C is easily enforceable, as motorized and mechanized uses are confined to the designated route and none of the area is open to over-snow vehicle use.

Finally, we are concerned that the 2020 Plan would remove the Windy Pass cabin from the rental program. This cabin is extremely popular with the public, and cabin rental fees are an important component of the Bozeman Ranger District recreation budget. Removing it from the public rental system will have a negative impact on visitor experiences and a negative impact on the District's budget – neither of which are discussed in the FEIS. Furthermore, while page 355 of Volume 2 of the FEIS describes the popularity of the cabin and the fact that it is utilized nearly every day of its operating season, the FEIS does not explain how this negatively impacts any of the desired conditions listed in the Plan for recommended wilderness areas. There are many popular campsites within recommended and designated Wilderness on the forest that are also occupied almost every single night in the summer. This has arguably more impact to Wilderness character than use of the cabin, considering that cabin visitors use the outhouse, store their food in a building, and do not cause resource damage by trampling vegetation to set up tents.

Cowboy Heaven

We object to the decision to manage Cowboy Heaven as a Backcountry Area instead of recommending it for wilderness in the 2020 Plan. People have recognized and celebrated the Wilderness potential of Cowboy Heaven for decades, and we are disappointed that this area is not recommended for Wilderness in the 2020 Plan. The area is adjacent to two units of the Lee Metcalf Wilderness and recommended wilderness on the Beaverhead Deerlodge National Forest. The forest's own Recommended Wilderness Analysis states **"The addition of these acres to recommended wilderness area would make for a more logical and manageable wilderness boundary than now exists."**⁵

We are also confused, because the Forest's rationale for not designating Cowboy Heaven as Recommended Wilderness hinges in part on mountain bike access, *despite* the fact that the three major mountain bike groups in this area – Big Sky Mountain Bike Alliance, Livingston Bike Club, and Southwest Montana Mountain Bike Association – all support a Recommended Wilderness designation. Collectively, these three organizations represent over 2,000 mountain bikers in Southwest Montana – a significant

⁵ Recommended Wilderness Analysis, Table 67, pg 270, Volume 3 Final Environmental Impact Statement for the 2020 Land Management Plan – Custer Gallatin National Forest.

portion of the total mountain biker population. While there are certainly some individual mountain bikers who disagree with these organizations, it is safe to say that the majority of mountain bikers in this region support a recommended wilderness designation for Cowboy Heaven, even if it means not being able to ride a few miles of trail.

The draft ROD mentions that one reason for not recommending Cowboy Heaven for wilderness was that the Madison and Gallatin County Commissioners expressed hesitation over this designation. All 6 members of the Gallatin and Madison County Commissions have endorsed the GFP Agreement, and thus have endorsed recommending Cowboy Heaven for wilderness. The Gallatin County Commission letter, which the Forest Supervisor refers to in her draft ROD as rationale for designating the area as a Backcountry Area, contains two brief sentences addressing Cowboy Heaven and neither sentence opposes a wilderness recommendation, nor does this letter explain how a wilderness recommendation would impact the valuable economic and recreation resources of Cowboy Heaven.

In the draft ROD, grazing infrastructure management was also part of the reasoning for not recommending Cowboy Heaven for wilderness. The presence of grazing allotments and infrastructure should not factor into the decision about whether to recommend an area for wilderness. The Wilderness Act does not preclude grazing or grazing infrastructure, and Congress has made this abundantly clear. The Congressional Grazing Guidelines state:

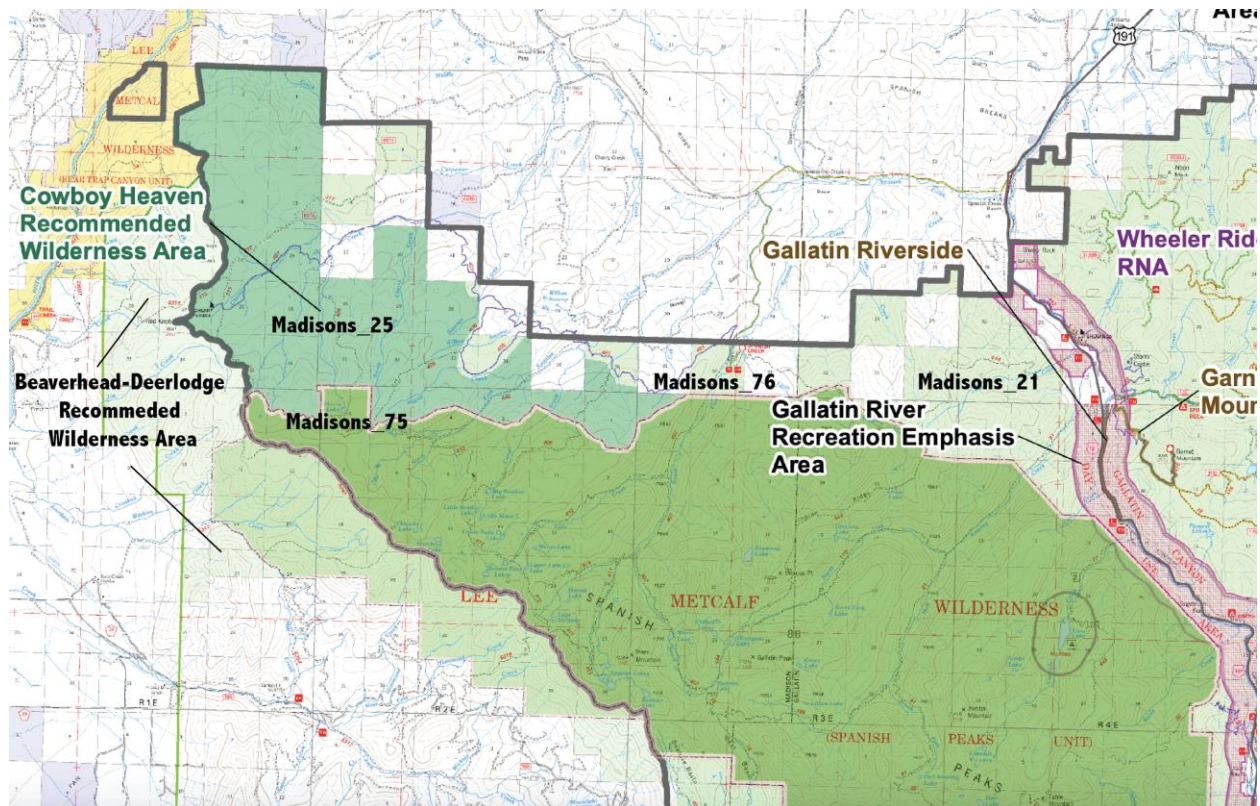
There shall be no curtailment of grazing permits or privileges in an area simply because it is designated as wilderness. As stated in the Forest Service regulations (36 CFR 293.7), grazing in wilderness areas ordinarily will be controlled under the general regulations governing grazing of livestock on National Forests. This includes the establishment of normal range allotments and allotment management plans. Furthermore, wilderness designation should not prevent the maintenance of existing fences or other livestock management improvements, nor the construction and maintenance of new fences or improvements which are consistent with allotment management plans and/or which are necessary for the protection of the range.⁶

Recommended wilderness should not be held to a different standard than designated Wilderness and the guidelines set by Congress for managing designated Wilderness. Therefore, the presence of allotments and range infrastructure is not a valid reason for denying Cowboy Heaven a wilderness recommendation.

The draft ROD also uses the rationale that a Backcountry Area better allows for fuel and restoration work in Cowboy Heaven. This rationale is hard to understand because the location of Cowboy Heaven, bordered by two units of the Lee Metcalf Wilderness and recommended wilderness on the Beaverhead Deerlodge, does not lend itself to intensive fuels work. This would not only be inconsistent with the management and desired conditions of the adjacent land, it would also be unlikely to effectively prevent the risk of wildfire. The prevailing wind direction suggests that a fire in Cowboy Heaven would move southwest, into the Lee Metcalf Wilderness. Cowboy Heaven is not a logical place to prioritize resources on fuels reduction. Wilderness polygons #21 and #76 on the other hand are areas that are adjacent to the Gallatin River Corridor. These areas seem to be far more logical for focusing fuels work as opposed to Polygons #25 and #75 where fuels work is unlikely to make a difference. Even if there was

⁶ H.R. REP. NO. 101-405, at 41 (1990)

reason to reduce fuels in Cowboy Heaven, low impact restoration activities such as prescribed fire, which are allowed in recommended wilderness, would be a better fit for this area and more consistent with land management across the larger area.



The #25 and #75 polygons are not logical areas to focus fuels and restoration work. Alternatively, fuels work should be focused in #76 and #21, polygons nearer to important infrastructure such as Hwy 191.

A Backcountry Area designation for Cowboy Heaven is insufficient because it fails to provide consistency with the larger landscape. The Custer Gallatin-managed portion of Cowboy Heaven is bounded by designated Wilderness, recommended wilderness (on the Beaverhead Deerlodge), and a large private ranch managed for conservation purposes (the Flying D Ranch), making the Custer Gallatin portion of Cowboy Heaven the lone public parcel unprotected as wilderness. Failing to recommend it for wilderness is incongruous with how the surrounding landscape is managed.

Remedies

- The Final Plan should include the Gallatin Recommended Wilderness Area described in Alternative C
- The Final Plan should include the Cowboy Heaven Recommended Wilderness Area described in Alternative C.
- The Final Plan should classify Recommended Wilderness Areas as Primitive

III. THE 2020 PLAN FAILS TO FULLY PROTECT THE BUFFALO HORN BACKCOUNTRY AREA AS ENVISIONED BY THE GFP AGREEMENT

We support the Forest Service's decision to designate a Buffalo Horn Backcountry Area in the Porcupine-Buffalo Horn portion of the Wilderness Study Area. This Backcountry Area, as described on pages 14-15 of the GFP Agreement, is a key piece of our Agreement. We provided feedback to the Forest Service regarding the Buffalo Horn Backcountry Area on pages 3-4 of our DEIS comments. The Buffalo Horn Backcountry Area is a unique and valuable landscape, known for its wildlife and wild lands and beloved by hikers, equestrian users, dirt bikers, mountain bikers, and snowmobilers. The Backcountry Area designation is a good way for the Forest Service to protect the area's ecological values while also managing for the many social values the area holds. Additionally, we appreciate that there are many other elements of the 2020 Plan that, in combination with the Backcountry Area designation, bring management of this area close to what was proposed in the GFP Agreement. With a few additional changes, the Forest Plan will protect the myriad values of this area for years to come.

We object to omitting the portions of the Hidden Creek and Goose Creek drainages that are included in the Buffalo Horn Backcountry Area in Alternative C but dropped from Alternative F in the 2020 Plan. There is no explanation in the FEIS for why this boundary adjustment was made. As best we can tell, the boundary adjustment is intended to match the Backcountry Area boundary to the ridgeline, but in doing so the Plan would fail to protect the character of the experience for visitors going to the Hidden Lakes. It's important that the Hidden Creek and Goose Creek drainages remain an undeveloped natural area into the future, especially as lakes are an extremely rare – and valued – natural feature in the Gallatin Range. Furthermore, as it does not appear that this area is within the suitable timber base and it is within an Inventoried Roadless Area, there is truly no conflict with including it within the Backcountry Area.

Additionally, we object to plan language that allows timber harvest in the Buffalo Horn Backcountry Area. The GFP Agreement states that “No commercial timber harvest or new road construction should be permitted” in the Porcupine-Buffalo Horn Wildlife Management Area (Buffalo Horn Backcountry Area). Our Agreement is not as detailed as a Forest Plan, and each recommended management guideline was carefully vetted before being included in the Agreement. We strongly believe that the Buffalo Horn area is not suitable for timber harvest.

The Buffalo Horn area has many qualities that make it suitable for a wilderness recommendation, and while we believe it is important to manage the area such that established recreation uses can continue, protecting its wilderness qualities is equally important. The FEIS vaguely states that prohibiting timber harvest “may limit some restoration projects requiring vegetation management”⁷ but does not explain what restoration projects are necessary or why timber harvest would need to be an element of any restoration projects. The Forest Service has many options for restoration projects that do not include timber harvest, and these options are a much better fit for a place like the Porcupine-Buffalo Horn. Indeed, the wording “may limit some projects” implies that prohibiting timber harvest does not mean restoration projects cannot occur in the Buffalo Horn Backcountry Area. Prohibiting harvest may mean that future restoration projects require some creativity, but this corner of the Wilderness Study Area deserves that level of thought. The final plan should include the plan component from Alternative C which states that the Buffalo Horn Backcountry Area is not suitable for timber production or timber harvest.

⁷ FEIS Volume 2 page 388

Finally, in both our Agreement and in our subsequent DEIS comments, we have brought attention to the need for the Forest Service to address the proliferation of user-created trails in the Porcupine-Buffalo Horn area, between the Big Sky Snowmobile Trail and Highway 191. Our Agreement states that “Immediately following completion of forest plan revision [the Forest Service shall] 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 proposal would improve wildlife habitat quality within the Backcountry Area, by reducing fragmentation, and improve recreation and visitor experiences, by reducing confusion. We are disappointed that the 2020 Plan does not address this issue. As we suggested in our DEIS comments, the Final Plan should include an objective that commits the Forest Service to conducting this travel analysis within 3 years and in coordination with Montana Fish, Wildlife and Parks.

Remedies

- Include the Hidden Creek and Goose Creek drainages in the Buffalo Horn Backcountry Area, as mapped in Alternative C.
- Include the following plan component, from Alternative C, in the Final Plan:
 - MG-SUIT-BHBCA: The backcountry area is not suitable for timber production or timber harvest.
- Include the following plan component in the Final Plan:
 - MG-OBJ-BHBCA: Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area’s trail network, including non-system trails, to identify and designate the necessary trail network.

IV. THE 2020 PLAN FAILS TO PROVIDE ADEQUATE PROTECTIONS FOR WILDLIFE IN THE FACE OF GROWING RECREATION PRESSURE IN THE GALLATIN RANGE

Protecting and improving wildlife habitat in the Gallatin and Madison ranges is at the heart of the GFP Agreement. Our shared appreciation for the region’s wildlife is the foundation upon which the entire Gallatin Forest Partnership is built, and we believe that the tension between increased recreation pressures and wildlife conservation will be the crux of forest management over the life of this revised plan. Therefore, we are keenly interested in how the revised forest plan will manage and protect wildlife habitat in the future. While wildlife conservation is woven into all parts of our Agreement, we specifically address wildlife on pages 27-28 of the GFP Agreement. We also discussed wildlife on pages 8-12 of our DEIS comments.

We appreciate that wildlife conservation is woven throughout the 2020 Plan, from forest wide direction specific to wildlife, to the designation of key linkage areas, to monitoring questions such as MON-WL-02 and 03. However, despite our continued advocacy on this front, the 2020 Plan does not fully address how the forest will sustainably manage recreation to reduce impacts to wildlife even as recreation use grows, nor are there monitoring questions to assist the forest in tracking its success on this front. We are also concerned that the 2020 Plan does not recognize the unique wildlife values that exist in backcountry areas such as the Buffalo Horn and West Pine Backcountry Areas. While all of the backcountry areas on the forest are important for wildlife, this value is not apparent in the 2020 Plan. There should be desired conditions associated with each backcountry area that specifically speak to the wildlife values of that area. We suggested such desired conditions in our DEIS comments. Likewise, the plan should include direction that will help improve habitat conditions over the life of the plan. This should not be limited to just forest wide direction. For example, our Agreement and previous comments bring attention to the issue of habitat degradation caused by unauthorized, user-created

routes in the Porcupine-Buffalo Horn area, between the Big Sky snowmobile trail and Highway 191. We also propose a solution to this problem - a shared objective for the Buffalo Horn Backcountry Area and Gallatin River Recreation Emphasis Area to conduct travel analysis for all trails within the Porcupine-Buffalo Horn area to designate additional system trails as necessary, and to allow no new trail construction following this process. This objective is missing from the 2020 Plan, nor does the plan include any language that will help the forest address this specific issue.

Remedies

- Include the following as a desired condition for Backcountry Areas forest wide, or specifically for the West Pine and Buffalo Horn Backcountry Areas: “Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area.”
- Include the following objectives in the final plan:
 - MG-OBJ-BHBCA: Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area’s trail network, including non-system trails, to identify and designate the necessary trail network.
 - MG-OBJ-GRREA: Within 3 years, initiate travel analysis for the portion of the Gallatin River Recreation Emphasis Area that is adjacent to the Buffalo Horn Backcountry Area to evaluate the area’s trail network, including non-system trails, to identify and designate the necessary trail network.

V. THE 2020 PLAN INCLUDES INCONSISTENT AND CONFUSING DIRECTION THAT REQUIRES CLARIFICATION

Forest Plans can be complicated and confusing documents for the public. Unless you are fully versed in the vocabulary of the Forest Service, it is easy to misinterpret Plan direction. Forest Plan revision presents an opportunity to draft a Plan that everybody can understand. Clear Forest Plan language aids in implementation too - if there is no ambiguity over what the Plan does and does not allow (or require), it will be easier for both the public and Forest Service staff to ensure that future projects comply with the Plan. While the current Forest staff may fully understand what the new plan means and seeks to achieve, future Forest staff may find inconsistencies confusing or approve projects that are not in line with the intent of the Planning Team. Relevant to the GFP, there are a few sections of the plan where the language should be clarified to reduce future confusion, or where the FEIS and 2020 Plan are inconsistent, and the Final Plan requires clarification. Many of our previous comments and engagement in this process was to provide suggestions for how the Forest Service could improve clarity in the revised plan. In this section of our objections, we will provide a few examples that relate directly to the GFP Agreement and issues we have raised in earlier comments.

One important component of the GFP Agreement is that a trail should be constructed to connect the Dry Divide Trail (#135) into the Bear Lakes Trail (#53).⁸ This trail would give mountain bikers and other recreationists the opportunity for long trail-based adventures, connecting communities and reducing the need to drive long distances to recreate. The draft Record of Decision states that previously approved and ongoing projects and activities are not required to meet the direction of [revised plan] and will remain consistent with the direction in the 1986 and 1987 plans, as amended.⁹ This seems to imply that decisions made in the 2006 Gallatin Travel Plan - even if they have not yet been implemented

⁸ GFP Agreement, page 20

⁹ Draft Record of Decision, page 48

- still stand. This is an important point to clarify, as our proposed trail connecting Trail 135 to Trail 53 is included in the Gallatin Travel Plan.

Under the 2020 Plan, this trail would fall within a Key Linkage Area, where new trail construction is not allowed but it seems that the trail *can* be constructed because it is a previously approved decision. We worry that if this language is not clarified, the trail will generate considerable controversy when it comes time to begin trail construction. To avoid unnecessary controversy, we suggest the amending FW-GDL-WL 03 as follows: “To maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed within key linkage areas **unless previously authorized by the Gallatin Travel Plan**. New recreation developments may be constructed to address on-going or imminent ecological resource concerns within the key linkage area, including but not limited to, degradation of wildlife habitat connectivity.”

Second, we have found discrepancies between how Alternative F is described in the FEIS and the Draft Plan. For example, Table 155 in Volume 2 of the FEIS, which summarizes the management direction for backcountry areas, states that construction or designation of new motorized trails is not allowed in backcountry areas¹⁰ yet this direction is not included in the Draft Plan. As with other direction in Table 155, this should be included as a standard in the forest wide direction for backcountry areas. The GFP Agreement calls for no new motorized trails in the Hyalite area¹¹ and designating a Hyalite Backcountry Area as we have previously suggested in this objection *and* clarifying (via a standard) that the construction and designation of new motorized trails is not allowed in backcountry areas would align with our Agreement.

Finally, the 2020 Plan does not clearly articulate the suitable timber base. Appendix B of the FEIS describes the process by which the Forest Service determined the suitable timber base, but this description is not entirely clear and the FEIS does not include a map showing which areas are within the suitable timber base. Based on the GIS data provided on the forest plan revision website (which is not a medium all members of the public are equipped to utilize), it appears that all of the South Cottonwood drainage - aside from the uppermost part of the drainage, which is within the WSA - falls within the suitable timber base. The first desired condition related to the suitable timber base states that “Lands identified as suitable for timber production support a regularly scheduled timber harvest program.”¹² Given the highly-valued backcountry characteristics of South Cottonwood, we see no way in which the public would support a “regularly scheduled timber harvest program” in this drainage but unless one *really* digs into the 2020 Plan (as we have), it would be almost impossible to understand that the 2020 Plan proposes regularly scheduled commercial timber harvest in South Cottonwood. Lacking this information, the public cannot fully understand or respond to the plan.

Remedies

- Amend FW-GDL-WL 03 to read: “To maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed within key linkage areas **unless previously authorized by the Gallatin Travel Plan**. New recreation developments may be constructed to address on-going or imminent ecological resource concerns within the key linkage area, including but not limited to, degradation of wildlife habitat connectivity.”

¹⁰ FEIS V2, page 382

¹¹ GFP Agreement, page 12

¹² 2020 Plan, page 76, FW-DC-TIM 01

- Include the following additional standard in the Final Plan - FW-STD-BCA: Construction or designation of new motorized trails is not allowed.
- Include a map in the FEIS showing the suitable timber base for each Alternative.

Thank you very much for your consideration of the above objections. The Custer Gallatin is a very important forest for all members of the Gallatin Forest Partnership. We value the forest's wildlife, wild places, and quality of life that it supports, and we are deeply interested in seeing a revised forest plan that sets the forest up for a sustainable future. More than 1,000 individuals, organizations, and businesses have endorsed the GFP Agreement and share our belief that the GFP Agreement charts the best path forward for the Gallatin and Madison portions of the forest. While we recognize that not every piece of the GFP Agreement fits neatly into a forest plan, we urge you to adopt our resolutions and ensure that the Final Plan closely matches the GFP Agreement.

On behalf of the Gallatin Forest Partnership, I would appreciate the opportunity to meet with the Reviewing Officer at a mutually convenient time to discuss our objections and proposed remedies. Please inform me in writing of any responses to these objections, opportunities to participate in an objection resolution meeting, or opportunities to submit additional comments.

Sincerely,

A handwritten signature in cursive script that reads "Barb Cestero".

Barb Cestero
Lead Objector