

To: Custer Gallatin National Forest Planning Team

From: Elizabeth Madden
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Re: Objections on Custer Gallatin Land Management Plan

Date: September 5, 2020

I am submitting these objections to the Custer Gallatin Land Management Plan. As I said in my earlier formal comments (May 2019), I have lived in Montana for 35 years and worked as a Wildlife Biologist during that time. I was a 20-year federal employee (Forest Service and US Fish and Wildlife Service), and enjoy recreating (hiking, skiing, birding, bird hunting, camping) on our public lands. I appreciate the amount of effort that goes into this level of planning.

In the draft plan and EIS, after reviewing all the alternatives, I felt that Alternative D provided the best strategy for managing our forest lands as we move forward. Alternative D would have given us the best shot at sustaining ecosystem integrity, especially in the face of growing threats from climate change, a huge increase in recreational use, and encroaching private land development throughout the region. Mass species extinctions are occurring *now* and this is our chance to help stem that tide. Although Alternative D is the one with the most recommended Wilderness in it, this is actually only a modest amount when we consider what we are up against as we move into the future. "Backcountry Areas" (BCAs) proposed in other alternatives are *not* an adequate substitute for Wilderness. BCAs focus too much on recreation, rather than ecosystem integrity, and allow for mechanized/motorized use. With increasing urbanization (Bozeman is forecast to approach the size of Salt Lake City within 25-50 years), it is imperative we fully protect as much of our wild ecosystems as possible.

I object to the choice of Alternative F as the preferred alternative and present specific objections herein. While I knew that the final forest plan would not likely recommend as much Wilderness as is prudent, I was extremely dismayed to see that Alternative F is woefully inadequate and has a number of significant, critical oversights in RWAs throughout the Forest.

Inadequacies in Alt F include the following oversights, and I petition the Custer Gallatin Forest to reconsider these:

Hyalite-Porcupine-Buffalo Horn Wilderness Study Area: The recommended wilderness proposed in the Final Plan concerning the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area is only half of the original acreage recommended! Only 77,631 acres of the total 155,000 acres of the WSA are being proposed as recommended Wilderness. I find this unacceptable and object to how the Forest Service derived these numbers. I think it is unconscionable not to honor the original acreage of this highly valuable wildlife corridor as determined by Congress in 1977. As

now proposed, the southern end of this WSA becomes extremely narrow, cutting much of the connectivity corridor for wildlife moving north out of Yellowstone area. At the north end of the original WSA, the plan now calls for the removal of the proposed Hyalite and West Pine wilderness areas. Alternative F will replace them as the 'Hyalite Recreation Emphasis Area' and the 'West Pine Backcountry Area.' I object to these practically meaningless categories (as defined in the final plan) of Backcountry Use Areas and Recreation Emphasis Areas, which offer little to no protection from motorized/mechanized use. This area is a crown jewel of our entire continent, and the importance of high species diversity and connectivity within the ecosystem must come first in an area with such great ecological value. As climate change closes in on the western U.S., these areas will only become more important for the well being of this ecosystem. **Please protect the entirety of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area as recommended Wilderness, as Congress designated it in 1977.**

Cowboy's Heaven: Cowboy's Heaven in the Madison Range, which has been in several wilderness bills, is tagged with backcountry designation instead of recommended Wilderness. I object to this oversight and urge you to reconsider! By recommending Cowboy Heaven for Wilderness, the Forest Service would be consolidating a wild corridor for wildlife away from the busy Gallatin Canyon and Gallatin Valley. Protecting Cowboy Heaven as wilderness was even at the heart of the Gallatin Forest Partnership Agreement. Even the mountain bike groups asked for Cowboy's Heaven to be Wilderness! Not recommending Cowboy Heaven for Wilderness is an illogical management decision, and I ask the Forest Service to reconsider and designate it as a RWA.

Lionhead RWA: I am dismayed to see that the final plan has completely dropped the 22,000-acre RWA in the Lionhead area - in an obvious capitulation to mountain bikers. The 1986 Gallatin Forest Plan recommended 22,000 acres of Wilderness for the Lionhead area. The Forest Service has unfortunately allowed mountain biking to become established in this WSA, and though it states the wilderness character has not changed, it points to this recreational conflict as the reason it is no longer suitable for Recommended Wilderness. I object to this, and urge the Forest Service to retain this existing area of Recommended Wilderness since the conditions have not changed to make it ineligible for Wilderness. You must not allow Recommended Wilderness protections to be eroded by your 'hands off' management of the past. Mountain biking is a grave threat to grizzly bear dispersal, as we look to foster connectivity between the GYE and Northern Rockies populations. This mountain range is a super critical wildlife corridor from Yellowstone to the Centennial Mountains - again, we are talking about a crown jewel ecosystem of North America: please allow it to flourish by fully protecting it. Plus, this area hosts the only section of the Continental Divide Trail within the Custer Gallatin National Forest - part of a national treasure.

Pryor Mountains: My previous comments called attention to the tremendous biodiversity of the Pryor Mountains, and I asked, with many others, for protecting four RWAs there. I greatly

appreciate the final plan's expansion of the Lost Water Canyon Recommended Wilderness area to include more of Crooked Creek, and also the recommendation of Bear Canyon for Wilderness designation. However, the final plan is not recommending Big Pryor and Punch Bowl for Wilderness, instead designating them as BCAs open to mechanized and motorized use. I object to this oversight in protections – we need to protect four distinct areas of the Pryors, each with their own characteristics and values, and I urge the Forest Service to recommend wilderness designation for both areas in the final plan. The proposed Backcountry Areas do not offer the level of ecosystem protection these sensitive areas need, particularly from that of motorized and other uses. Time is of the essence in protecting the priceless ecological and cultural treasures of the Pryors, before it is too late. **Again, I ask the Forest Service to designate Big Pryor and Punch Bowl as RWAs.**

In closing, as a frequent public lands user in the Custer-Gallatin area during more than 30 years, I am dismayed and concerned with the growing and heavy recreational use and crowded trailheads we are experiencing throughout the region – it is alarming. Unless more critical areas are better protected from burgeoning recreation, I am disillusioned concerning the likelihood of wildlife connectivity (“Key Linkages”) ever being established in any meaningful way through the Forest as needed. Coupled with climate change and development, the future of our wild landscapes looks grim indeed. I appreciate the Forest Service's great responsibility and work toward managing this burgeoning use in the face of unprecedented climate challenges. Thank you for considering the above objections to the proposed final Forest Plan.

Elizabeth Madden

Signature: Elizabeth Madden

Date: 9/5/2020