

Objections to the CGNF 2020 Land Management Plan & Draft Record of Decision

September 7, 2020

Thank you for the opportunity to comment again on the CGNF Plan (Plan). I have previously submitted substantive comments on various stages of the Plan as it was under development. I don't believe my objections below are beyond the scope of my previous comments, so I consider myself to have good standing to offer these objections to the 2020 Land Management Plan and Draft Record of Decision. These comments are offered in a timely fashion within the allowed objection period.

In general, I found your decisions to be well reasoned and well supported, and I especially appreciate the tone and detail of background information and rationale contained in the Draft Record of Decision (DROD).

My objections relate primarily to a few issues with the land management designations detailed in the 2020 Plan, focusing primarily on Recommended Wilderness Areas (RWAs), Backcountry Areas (BCAs) and Recreational Emphasis Areas (REAs). My comments are grouped below by Geographic Area as used by CGNF.

But I first wish to make a more general comment on a decision rationale that was cited on several occasions in the DROD as a reason for sometimes rejecting a more protective land management designation in favor of a less protective one, or as a reason to not curtail current uses that have potential harmful impacts to the resource. That rationale was variously expressed as "perceiving few threats to the undeveloped character" of an area, or as allowing existing uses inconsistent with current designations to "continue as long as they do not degrade the character of the area". It may be that this rationale was a component of other land allocations beyond those specifically cited in the DROD.

If recent history tells us anything about predicting the future of land uses and recreational demands on our forest it tells us that we don't often anticipate the pace of change and the impact of a growing population with an increasing inventory of recreational equipment and demands. While we can assume that this new Plan will be reviewed and revised in about 15 years, we also know the current plan has been in place for over 30 years. In 1987 we didn't correctly anticipate the impacts from the development and expanded use of full suspension mountain bikes, electric bikes, lighter and more capable snowmobiles, or all the new ATV and ORV designs, nor the growth in demand for recreational use in general of our national forests.

Indeed, the pace of development and use of new technologies that allow people to travel further and faster and over rougher ground and snow is accelerating, and I doubt that our ability to perceive their potential impacts is increasing at the same pace. We didn't foresee affordable drones or e-bikes being used in the forest even 10 years ago. And then there is the occasional administrative decision that can permit an end-run around existing protections, such as the DOI's recent decision that bikes with electric motors are essentially considered to be non-motorized. What might prohibit the next FS Secretary from making a similar proclamation? For all these reasons it is proactive and protective of our forest to put in place sufficient regulations that are designed to maintain or enhance the character of the land in the face of additional threats, and not to assume that new threats won't manifest over the life of the Plan.

Therefore, I urge the FS to rethink this decision rationale and instead adopt a different approach to protecting our soil, water and habitat – a criterium that assumes the current conditions in our most sensitive and wildest areas will likely be degraded without additional protections and limitations of use. This is all the more important when considering the FS's past inability to

protectively monitor and control ever expanding uses and impacts. Even today, it is not uncommon to see unauthorized and unpermitted uses of lands designated as Wilderness or Wilderness Study Area or otherwise closed to motorized or mechanized use. I witness these transgressions and their impacts in person on several occasions every year, and it is readily apparent that the FS does not have adequate resources to effectively monitor these abuses and their impacts to the CGNF. It is imperative that we don't assume will be able to do so in the future as our population grows and new recreational demands emerge.

Along those lines, I recommend the Plan language in the **Desired Conditions and Goal for Emerging Recreational Technologies (FW-DC-RECTECH and FW-GO-RECTECH)** be strengthened to include assessments of those new technologies in terms of potential impacts to the environment and monitoring to make sure that predicted and acceptable impacts are not being exceeded. The Monitoring Plan should also be updated to include a clear requirement that impacts from recreational uses on soil, aquatic resources and wildlife populations and distributions will be included.

Madison, Henrys Lake, and Gallatin Mountains Geographic Area

The Cowboy Heaven area should be designated as RWA and not BCA. The Cherry Creek cabin and its access road could continue to exist and be used within an RWA with proper planning and allowances that are used elsewhere within Wilderness Areas. The presence of these assets should not be used as a reason to exclude this deserving area from RWA protection. Likewise, grazing could be accommodated by RWA designation.

With access to this area restricted due to the privately owned Flying D Ranch on its northern boundary, and with no current motorized use (other than to Cherry Creek Cabin) and very little mechanized use of Trail #401, the current use of this area is dominated by hikers and stock use, which is consistent with RWA status. The local mountain bike clubs endorsed the Gallatin Forest Partnership (GFP) proposal of RWA for this area due to its unsuitable nature and infrequent use as a biking route. Additionally, this area is adjacent to RWA to the west in the Beaverhead Deerlodge NF and would serve to connect the Bear Trap Canyon and Spanish Peaks Units of the Lee Metcalf Wilderness Area providing a greatly expanded wildlife corridor between varying habitats.

The DROD mentions the hesitancy expressed by the Gallatin County Commissioners toward the designation of Cowboy Heaven as RWA, but I remind you that the Commission did, in fact, endorse the GFP proposal which included a recommendation of RWA for the core of Cowboy Heaven. This is a relatively isolated area in terms of public access and use and would seem to be an unlikely place to consider future fuel and restoration activities. Given its attributes, its roadless area status and its prime location close to Bozeman and other RWA, Cowboy Heaven would be a great addition to the Lee Metcalf Wilderness Area and I encourage you to designate it as RWA.

The Gallatin RWA should be extended to the north to include all the Hyalite Creek watershed area north of Grottos Falls and to the west to the extent of Hyalite Ridge, so that its western boundary would run from Hyalite Peak to Divide Peak, Mount Bole and Alex Lowe Peak and then to Mount Blackmore. Mechanized and motorized use of Trail #185 to the east of Divide Peak, and of Trail # 427 above Grottos Falls, should be curtailed. Leaving this portion of the HPBH WSA out of RWA allocation is a mistake that excludes the crown jewels of the already compromised WSA. As the iconic Hyalite Alps of the northern Gallatins and the very headwaters of Bozeman's municipal watershed, this area deserves more protection than will be provided by the proposed REA designation.

The Gallatin RWA should also include those lands to the south, west and east of Sheep Mountain, adjacent to the Yellowstone NP boundary (western half and northern part of section 32), which would connect the Gallatin RWA with the Sawtooth Mountain RWA.

The Lionhead RWA should not be forfeited for allocation as a BCA. As stated in the DROD this area generally retains most of the wilderness characteristics that led to its designation as RWA over 30 years ago. While this is an encouraging statement in light of the FS's failure to exclude mechanized travel and trail development in this area, it should not be taken as an indicator that this continued inappropriate use will not have greater impacts in the future. Indeed, we know that impacts will almost certainly grow and that wilderness characteristics will suffer as a result. Now is the time to recognize past mistakes and manage this important area as it should have been managed and to continue to allocate it as RWA.

Protecting this valuable wildlife corridor with its rich, varied habitat and which contains the only section of the CDT on the CGNF is much more important than avoiding the disappointment of some segment of current users who should not have been allowed to establish mechanized use over the past few years. Just like the adjacent Targhee Creek RWA in Idaho, the Lionhead area qualifies for continued protection as RWA.

The Buffalo Horn BCA is a critical piece of the outstanding wildlife habitat of the CGNF and these values should trump the recreational uses of this area in each and every instance where they may come into conflict. The Standards for this BCA (MG-STD-BHBCA) should be amended to include a 4th item: New mechanized trails shall not be constructed or designated.

Like many in our community, I fear this area is where a majority of conflicts between recreational users and with wildlife values may occur, largely due to increased population and visitation in the Big Sky area. I encourage the FS to think and act creatively to effectively monitor the impacts of recreation in this area to ensure that this valuable habitat is not impacted beyond that occurring now. User created routes and unauthorized use of existing routes is an issue across the CGNF, but it is perhaps most critical to wildlife habitat and distribution here. The monitoring plan should reflect these critical concerns and require that they be routinely assessed and reported. I also encourage the FS to reach out to local NGOs as possible partners to accomplish this critical task.

The Hyalite REA should be expanded to the west to include the lower reaches of South Cottonwood Canyon (the upper reaches should be included in the Gallatin Crest RWA, as mentioned above). This popular recreation area should be off-limits to future timber harvests and managed to preserve its recreational and scenic values. Consideration should be given to connecting the Hyalite REA to the Storm Castle REA since Trails #422, 417 and 422 already provide a connection between the two REAs.

Bridger, Bangtail, and Crazy Mountains Geographic Area

The South Crazy Mountains RWA and BCA are welcome components of the Plan and will help preserve this unique and valuable area for future generations of humans and wildlife. Why are the adjacent or nearby sections to the east (8, 9, 10, 16, 22, 27 & 34) not included in the RWA allocation? And similarly, the BCA should be expanded to include several more sections to the east. While acknowledging the checkboard ownership presents management challenges, that pattern should not allow the private owners to unduly influence management decisions or benefit from the same circumstances. The public should manage its land as dictated by its mandates and not be restricted by the presence of private land and owners who may maintain a shorter-term view and a different set of values. It seems that for far too long the presence of interspersed private ownership has been allowed to hamper or limit land management decisions

on public lands, thus in effect transferring the de facto management and use of those public lands to the private owners of the adjacent parcels at the expense of the general public.

Most if not all of the proposed BCA is currently without mechanized or motorized routes and it is important to preserve these protections by restricting the BCA to primitive, non-motorized and non-mechanized use only. Again, we cannot assume that current minimal uses or impacts will not grow substantially in the future. This is the opportunity to preserve the character and value of this landscape before future uses multiply. This BCA should be open to foot and stock use only.

Thank you for your work on the Plan and for this opportunity to comment once again, especially during these times when the current administration seems to be working hard to minimize public input into the management of public lands.