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Subject: Comments - Draft Plan - CGNF

Below are my current comments on the GCNF - Proposed Action Plan Revision #50185. I have tried to organize my comments under specific topics as presented in the Proposed Plan (Plan), and have included additional general comments (at the end) not referenced to specific sections.

#### In General

1. The Plan is well organized and well written, and I appreciate what a massive undertaking this represents. The Plan is concise and thorough, but I did find a lack of detail in some areas which made it difficult to discern the basis for some aspects of the Plan.
2. I think the FS has done a great job of publicizing the Plan and the comment period with your emails, webinars and open meetings. However, my experience has indicated that FS personnel sufficiently familiar with Plan development to answer specific questions as to methods and outcomes are not present at these sessions. The sessions seem to be focused primarily on publicizing the methods by which the public can comment on the Plan and not on providing background information about the specifics of the Plan.
3. I was disappointed in the detail of many of the maps presented, especially the maps related to designated areas - it was very difficult if not impossible to determine the precise locations on the ground of many of the designated area boundaries due primarily to the inability to zoom in close enough to capture the needed landscape details. Where I reviewed the appendices related to these designations there did not seem to be any supporting documentation as to the precise boundaries of these designated areas. I did not see larger format paper maps of these areas when I visited the open house at the Bozeman Ranger District.

#### Chapter 2 - Proposed Forestwide Direction

4. Wildlife (WL), FW-DC-WL-03: The portion of this DC that addresses connectivity (the 3rd and 4th sentences) is extremely important and should stand alone as a separate DC. Additionally, this text should include additional language to include vegetation patterns and control of adverse impacts from recreational uses as being critical in protecting habitat connectivity.
5. Energy and Minerals EMIN: What is meant by the statement in the leasable minerals section that "A leasing decision will not be part of this proposed action"? Are you speaking about decisions about individual leases or all the 18 suspended oil and gas leases? The disposal of these resources is identified as discretionary - what are the parameters of that discretion?  
Are these leases the same "outstanding subsurface mineral rights" that are referenced repeatedly in the Wilderness Evaluation (Appendix D) of numerous polygons? If so, in that context they seem to have a negative impact on potential Recommended Wilderness designation due to the complicating effects on future management of RWA's. This seems like ample reason to take some action regarding these suspended leases or other "outstanding subsurface mineral rights" that seem to be limiting the highest level of protection of the other values of the surface lands, waters, flora and fauna - RWA designation. Shouldn't there be a DC or Goal to work to resolve these leases and other mineral rights that are not currently active, especially since their presence appears to limit management options?
6. Roads and Trails (RT), Goals (FW-GO-RT): I suggest adding text to current Goal 03, expanding it to include a goal of increasing voluntary trail work by some measurable amount each year, consistent with the objectives of the National Forest System Trails Stewardship Act. It seems there should be some reference to this Act in the Plan.
7. General Recreation (GR), Desired Conditions (FW-DC-REC): Given the rapid evolution of recreational means,

vehicles, devices, etc., it is important that the FS anticipate changes in recreational demands and that it has the capacity and authority to evaluate any adverse impacts to resources in a timely manner so that harmful uses can be identified and controlled. I recommend the addition of a new DC or revision of an existing DC to state this desired condition.

8.Recreation Settings Recreation Opportunity Spectrum, Desired Conditions (FW-DC-ROS): Primitive ROS Settings for summer and winter should apply to both designated Wilderness and Recommended Wilderness. These designations should not be subject to semi-primitive ROS.

9.Visitor Education/Interpretation (RECED), FW-DC-RECED-06: Is the collection of petrified wood OK?

10.Emerging Recreational Technologies (RECTECH), FW-DC-RECTECH-01: Please revise this DC by adding: consistent with recreation settings and resource protection.

Recommended Wilderness Areas (RWA)

11.FW-SUIT-RWA- 04: "Recommended wilderness areas are not suitable for motorized or mechanized recreation". THANK YOU, GREAT WORK! I support this decision applied across the CGNF and further encourage the FS to adopt the language used by the Beaverhead-

Deerlodge NF Plan for RWA's: Standard 13: Wheeled or motorized vehicles designed for the primary purpose of transporting people, except for wheel chairs, are prohibited in recommended Wilderness except for permitted or administrative uses.

12.FW-SUIT-RWA-05: "Recommended wilderness areas are not suitable for developed recreation sites, such as recreation rental cabins." I recommend this statement be revised to state that RWA's are not suitable for new developed sites or recreational rental cabins, and existing sites will be evaluated on an individual basis considering their history, setting, and impacts on wilderness experience. Some of these sites, e.g., Windy Pass cabin, have historical significance and are largely unnoticeable from most vantage points.

13.Additions to Proposed RWA's (Table 2-20): I encourage the FS to expand the acreage of RWA's to include other suitable lands within the named Geographic Areas and to include the Crazy Mountains as an additional Geographic Area with additional RWA acres. My comments to this point are presented below under Chapter 3 - Proposed Geographic Area Direction

Eligible Wild and Scenic Rivers (WSR)

14.I support the recommendations contained in the proposal presented by the American Rivers Association (AR) and Montanans for Healthy Rivers (MHR). AR and MHR have evaluated the ORV's associated with the streams contained in the CGNF Draft WSR Eligibility and in many cases recommended additional or different ORV's. Please consider these differing ORV's as a means to provide better protection for these streams.

15.Additionally, AR and MHR have recommended an additional 24 streams, with associated ORV's, as eligible for inclusion within the WSR Draft Inventory. Again, I support their recommendation and request the FS review these additional streams.

Land Status and Ownership and Land Uses

16.Objectives (FW-OBJ-LAND): "01 Every decade, acquire between one and five new roads or trail rights-of-way that are needed as high-priority access or would fill a gap in existing access to public lands." I think the FS can and should set a higher goal for this very important milestone. Given the current conflicts over access, the checkerboard ownership patterns across some of the CGNF and the increasing utilization of the forest for recreation, this goal should more ambitious. If necessary, qualifiers could be added indicating that budget conditions may influence this goal.

### Chapter 3 - Proposed Geographic Area Direction

#### Ashland Geographic Area

17.Cook & King Mountains & Tongue River Breaks, Desired Conditions (AL-DC-ABCA) 01: This desired condition correctly recognizes the special features of this area, is appropriate and mandates special management to accomplish its goal. While the proposed Backcountry Area designation while help meet this goal, designating these areas as RWA's will provide more protection and best achieve the desired condition.

#### Pryor Mountains Geographic Area

18.General Overview: It is recommended that the FS better coordinate its management and land use designations of the Pryor Mountain area with the bordering lands managed by the BLM and NPS. Consistent

land management schemes that cross ownership boundaries should be applied wherever possible.

19. Recommended Wilderness: Table 3-12 should be expanded to include additional RWA's. The Lost Water/Crooked Creek RWA should include approximately 13,000 acres. Additional areas and approximate acres suitable for RWA designation include the Punch Bowl (8,500 ac.), Big Pryor (12,000 ac.) and Bear Canyon (10,000 ac.). Providing RWA designation within these areas would be the most effective way for the FS to preserve the unique flora and fauna and the cultural significance of this landscape. The FS proposed designation of "Backcountry Area" for these lands is not adequate to protect the current wilderness characteristics and values of these areas.

Absaroka Beartooth Mountains Geographic Area

20. Recommended Wilderness: I support the proposed RWA's included in Table 3-19.

Bridger/Bangtail and Crazy Mountains Geographic Area

21. Recommended Wilderness - Crazies: I have hiked in the Crazy Mountains on several occasions and found them to contain some of the most scenic, wild and untrammeled acres of the CGNF. I am concerned that despite the large number of roadless areas and the presence of wilderness characteristics that zero acres are proposed as RWA's. Granted, the checkerboard ownership pattern and severed mineral rights might present management difficulties and public access issues, but this is not always the case, and this magnificent landscape deserves better protection than currently proposed. I believe the FS placed far too much importance on Criterion 5 - "Evaluate the degree to which the area may be managed to preserve its wilderness characteristics" of the wilderness evaluation process and let those possible management difficulties overrule the other four criteria, all of which seem to be abundantly met by many areas within the Crazies. I say the answer to your question posed in Appendix D, page 5, is "Yes, it is possible to manage these areas to preserve wilderness characteristics."

22. I wish I was familiar enough with more of the Crazies to make additional, specific recommendations for RWA's, but I certainly believe that portions of Polygons 36 and 37 are suitable. The central area where these polygons abut that includes upper Cottonwood Creek, Cottonwood Lake, Glacier Lake, Grasshopper Glacier, Twin Lakes, Pear Lake, Crazy Lake and the surrounding high peaks are recommended for further wilderness evaluation.

23. In summary, I believe the FS relied too heavily on the assumption that the mere presence of "outstanding subsurface mineral rights" and/or the land ownership pattern will necessarily present management difficulties sufficient to prohibit the designation of RWA's. Mineral rights may not be exercised or acted upon and land ownership may change and consolidate, so let's look at these unfortunate circumstances as opportunities, not unsurmountable obstacles to the proper land management designations. Should we fail to protect these areas that have strong wilderness characteristics now by designating them RWA's, we are not likely to have a second chance to do so.

24. Crazy Mountains, Recreational Opportunity Spectrum (ROS): There are trails in the Crazies that are currently restricted to foot and horse travel only. The FS should assign a "Primitive ROS" to those areas.

25. Crazy Mountains, Desired Conditions: Please include as a desired condition the protection of cultural values and wild characteristics.

Madison, Henrys Lake and Gallatin Mountains Geographic Area

Recommended Wilderness:

26. Lionhead/Henry's Mountain Area: I support the RWA acres included in the Plan and encourage the FS to expand those acres to 22,800, the footprint of the current designation. I also support your decision to allow only foot and horse traffic within this RWA. Please apply a "Primitive ROS" status for this entire RWA. This area is an important wildlife corridor between Yellowstone National Park and the Centennial Mountains and deserves increased protection.

27. Taylor Hilgard Area: This inventoried roadless area of about 4,470 acres, located just to the south of the current Taylor Hilgard unit of the Lee Metcalf Wilderness Area, is correctly proposed as RWA and could be eventually added to the Lee Metcalf Wilderness. Please change the ROS for this area to "Primitive ROS".

28. Cowboy's Heaven Area: This area of about 15,700 acres, situated between the current Bear Trap Canyon and Spanish Peaks units of the Lee Metcalf Wilderness Area, should be designated as RWA. It is also adjacent to the Beaverhead-Deerlodge NF's RWA directly to the west.

29. Sawtooth Inventoried Roadless Area: I support the RWA designation of this area.

30. Gallatin Crest and Hyalite-Porcupine-Buffalo Horn WSA: I support the proposed RWA designation for the heart of the Gallatin Range, but strongly encourage the FS to expand this area to include more of the footprint of the existing HPBH WSA.

31. Big Creek Area: The area that includes Big Creek and the southern part of its watershed is a critical piece of this landscape that needs to be added to the RWA. This is a wild watershed, currently open to only foot and horse travel on most all existing trails beyond the initial trailhead, and provides valuable connectivity and habitat for wildlife, including grizzly bears. It also represents a lower elevation ecosystem that would be a valuable addition to the primarily alpine character of the Gallatin Crest, providing needed diversity for wildlife and recreational experiences. Big Creek is a Wild and Scenic eligible stream with a "fisheries" ORV, as evidenced by the following description in Appendix E: High quality habitat relative to the region of comparison. Pure Yellowstone Cutthroat Trout population. No exotics. A natural barrier exists to keep out non-native species. American Rivers and Montanans for Healthy Rivers suggest that "recreation" and "scenic" ORV also apply to Big Creek.

Surely this watershed qualifies for the most protective designation that can be applied. A natural topographic feature would provide a logical boundary for additional RWA lands on the south side of this watershed, leaving a buffer of non-RWA forest above the stair-step boundary between Forest and private lands. This would also allow Trail #183 to remain open to mountain bikes. Also, please note that it is my understanding that the local mountain bike community agreed to forego mechanized use of the Big Creek Trail (#180) as part of the Gallatin Forest Partnership Agreement.

32. Gallatin Crest lands surrounding Hyalite Peak: The Plan excludes from RWA designation an important area of roadless lands just to the north, east, south and west of Hyalite Peak. This is a critical oversight that needs to be corrected by including this area with the RWA. Allowing this area to remain outside RWA designation invites uses that are not compatible with the wilderness characteristics of this terrain and threatens wildlife connectivity. Its omission also creates the future possibility of a cross-crest corridor for mechanized and motorized travel. The iconic Hyalite Peak and its surrounding roadless acres need to be included with the RWA. The northern boundary of the RWA should extend, approximately, from the point on Divide Peak ridge where Trail #185 crosses, easterly to Hyalite Lake and northeasterly up to Overlook Mtn. and Mt. Chisholm, so that these peaks and Fridley Peak, Fridley Lakes, Horseshoe Basin and Twin lakes are included within the RWA. This is part of the crown of the Gallatin Crest and should be part of the RWA, especially since many of the other magnificent peaks to the north may unfortunately be excluded.

Other Area Designations:

33. Buffalo Horn Backcountry Area: I believe a more appropriate designation for this area, which is largely if not wholly a part of the current WSA, would be Wildlife Management Area. This designation would provide maximum protection for wildlife habitat and connectivity in this critical area. I believe that much of this area is part of the Primary Conservation Area-Recovery Zone for grizzlies and all of it is deemed suitable habitat for grizzly bears. A designation that focuses on protection of wildlife habitat is most appropriate for this area and would likely allow for closer and more specific monitoring of the attainment of desired conditions such that harm to wildlife values would be more quickly identified and alleviated by changes in human uses.

34. Additionally, I recommend the proposed Wildlife Management Area designation be extended to the north, across the current WSA boundary, to include Hidden Lakes, and the watersheds of Lewinski and Goose Creeks.

#### Chapter 4: Monitoring Plan

35. General Comment: It is critically important that a robust monitoring plan and monitoring efforts take place to ensure the final Plan is implemented as designed and that future management and uses of the landscape are consistent with the goals and desired conditions contained within the Plan. I am particularly concerned about how the FS will monitor the possible negative impacts of human recreation and travel on wildlife. I recognize the magnitude of this task and encourage the FS to seek appropriate funding and resources to carry out this critical mission. Help may be available in the form of partnership with NGO's, communities, user groups, etc., and the FS should pursue and promote these resources whenever they make sense.

36.General Comment: The maps provided here are of little utility, making review difficult and uncertain. Little detail is discernable and boundaries of polygons are difficult to determine.

37.Also, although data is presented in response to the various evaluation criteria in the charts, it is not possible to determine what if any weighting was applied to these data points. How is all this data evaluated in the process of determining what acres might be designated RWA or not? You have presented the data, but not the actual evaluation. Are there certain criterion that are considered "threshold" factors, such as 5,000 acre size, and other criterion that are considered "balancing" in the final analysis? Why not describe the actual evaluation process and the methods used to make sure that that process is uniformly and consistently applied across all polygons? Do other national forests do this differently, or is there some guidance that is applied across all Forests? And what if the polygons were drawn differently, so that acres with strong wilderness characteristics were perhaps grouped in the same polygon instead of being dispersed among adjacent polygons? Was there any consideration given to how those polygons were delineated?

38.Outstanding subsurface mineral rights: This term is used repeatedly but I was unable to find it defined anywhere in the Plan. What are these rights? Are they current and active, or actionable, or expired, or retired, or economically unfeasible to develop? Clearly, their mere presence portends badly for possible RWA designation, but is that a logical conclusion? I would argue that some of these rights might not ever be exercised or acted upon and may make no difference what so ever in the ease or difficulty in managing the land as RWA. It seems that at worst, they might present a potential management difficulty in the future, but perhaps they are just as likely to present no difficulty. I wonder if these rights present any difficulty in management now, or in the past decades. How did you evaluate this potential difficulty, or does the mere presence of this situation automatically lead to a conclusion of future management difficulty? What factors suggest that managing these lands under an RWA or future Wilderness designation would be any more difficult than managing them under some other designation? It seems managing them for timber production, motorized recreation, and other developed uses would be much more difficult them managing them as RWA's.

39.Recall that the 1964 Wilderness Act expressly allows mineral prospecting and collection of information about mineral and other resources on Wilderness lands, and in fact, stipulates that it occur. I refer you to Special Provision 2 of that Act, with emphasis added:

Nothing in this Act shall prevent within national forest wilderness areas any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if such activity is carried on in a manner compatible with the preservation of the wilderness environment. Furthermore, in accordance with such program as the Secretary of the Interior shall develop and conduct in consultation with the Secretary of Agriculture, such areas shall be surveyed on a planned, recurring basis consistent with the concept of wilderness preservation by the United States Geological Survey and the United States Bureau of Mines to determine the mineral values, if any, that may be present; and the results of such surveys shall be made available to the public and submitted to the President and Congress.

Thus, Congress anticipated and mandated (notice the reoccurring word "shall" in Provision 2 above) that mineral and other resources in Wilderness areas be evaluated. I can't think any logical reason for that other than the expectation that if at some time in the future those mineral resources might be deemed of sufficient value or strategic importance to allow their extraction, pending the already authorized adjustment of boundaries by the appropriate Secretary. Since this possibility was anticipated by the Act itself, how does the presence of "outstanding subsurface mineral rights" argue against a designation of RWA?

40.Land Ownership Patterns: First, it seems polygon boundaries may have been drawn or shaped differently, been smaller and more numerous, or otherwise altered to minimize the amount of privately owned lands within some of those polygons, thus eliminating any or most concerns about future management difficulties. Second, and consistent with my argument above regarding mineral rights, what is the basis for the apparent conclusion that the presence of private lands necessarily creates future management difficulties, and only so if the land is designated RWA? In certain circumstances, it may create some difficulties but it also may not, and which of those difficulties might be particularly troublesome for RWA management versus management under other designation? Similarly, different ownership patterns might, in some circumstances, disrupt opportunities for unconfined recreation, but not necessarily so. Not all landowners are opposed to granting access and allowing foot and horse travel. And it seems often the case that these outside parcels are managed, or maintained, in a

manner similar to that of the Forest lands, creating little or no distinction to the casual observer. Where access rights are disputed or non-existent, they can sometimes be gained through negotiation, as we see happening in the Crazy Mountains now. Let's don't let the mere presence of privately owned parcels dictate or limit how we manage our public lands.

Understanding there is subjectivity in this evaluation, I nevertheless believe there should be some model or some written guidelines that help the evaluators make these decisions consistent across the CGNF and across all National Forests.

41. I will also point out that the Wilderness Act anticipated the inclusion of private and state owned lands within external Wilderness Area boundaries. Defaulting to a conclusion that these circumstances are sufficient to deny RWA status to otherwise deserving lands is not supportable.

#### Additional Comments not Referenced to Specific Sections of the Plan

##### Gallatin Forest Partnership Agreement and Proposal

I know that you are aware of the Gallatin Forest Partnership (GFP) and their agreement and subsequent proposal submitted in response to the Plan. Their agreement was the result of long and careful negotiation and compromise by a pretty diverse group of interests, all of whom are routine users of the CGNF. Generally speaking, I believe that all the interest groups who were willing to talk and compromise and invest the time needed to hammer out such an agreement were included in this effort. I support their recommendations in regard to invasive weeds, wildlife, water resources, outfitting & guiding, proscribed fire & timber, designations and recreation. I urge the Forest Service to adopt those recommendations as they consider alternatives to the Plan.

##### Closing Appeal for Inclusiveness in regard to RWA Designations

"In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

This is the opening Statement of Policy from the 1964 Wilderness Act. Being 66 years old and a lifetime beneficiary of all the multiple uses of our wonderful National Forest lands, I remember hearing and reading about the Act when it passed. Some of the very National Forest lands that I hunted, fished, hiked, camped, floated, jeep-rode and generally enjoyed as a youngster later became Wilderness Areas. I cannot overstate how good this makes me feel - that other kids today and tomorrow will have the same spots to enjoy.

I spent most of my career in the forestry and forest products business and I highly value the capacity of our forest to produce sustainable, renewable resources. Yet there is no higher and better use than Wilderness. There is no better savings account that we can invest in for our children and grandchildren. I still crave the early mornings and late afternoons on the Gallatin Crest and all the other magnificent landscapes we are so fortunate to enjoy here in SW Montana. This is our chance, and my last chance, to positively reinforce the wilderness heritage that has been so important to the character of our country and our people, for the sake of our kids. Let's give them the maximum opportunity to enjoy the benefits of wilderness.

I know that current politics cannot rule the performance of your administrative duties, but policy can - and as far as I know, Congress has not overturned the policy statement contained in the opening sentence of the Wilderness Act. But let's not pretend that current politics can be, or should be, ignored. It is becoming increasingly clear that absent an overt act by the Forest Service to designate deserving lands as Recommended Wilderness, there will be no second chance in today's political climate. Even with such a designation, there will be long struggle to the ultimate goal of securing the approval of Congress and a President for inclusion in the National Wilderness Preservation System. But if the Forest Service fails to act positively and unambiguously in

favor of Recommended Wilderness for specific lands, there will likely be no second swing of the bat; no realistic hope that maybe it will happen next time around. Evidence abounds in current proposed legislation in the US Senate and House, sponsored by short-sighted Montana legislators, that protecting lands once deemed candidates for wilderness designation until they can undergo a deliberate, thoughtful, public evaluation of wilderness suitability is not going to happen on their watch.

We are now blessed with lands that exhibit wilderness characteristics sufficient to merit their designation as RWA's. Some of these lands are temporarily protected by current designation, others by remoteness, such that those wilderness characteristics have persisted. Increasing population, recreational use, resource monetization demands and political posturing will overwhelm these areas absent protection afforded by RWA designation. Let's preserve these deserving areas as they are now, for the benefit of our future generations. If we err, let's err on the side of designating too much wilderness, setting aside too many acres for wildlife, watershed, air quality, soil protection, cultural and historic values, solitude and quiet recreation. We won't likely get another chance.

Thank you for the opportunity to comment on the Plan.

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March 5, 2018

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