Data Submitted (UTC 11): 6/4/2019 6:59:31 PM First name: Bill Last name: Cunningham Organization: Title:

Comments: I have reviewed the draft Custer Gallatin Forest Plan. Please accept the following as my comments for the public record.

I am in strong support for Alternative D for a number of reasons. It is by far the most far sighted and responsible means of safe guarding our irreplaceable wilderness heritage on the forest with its recommendation for 711,000 acres of additional designation Wilderness. Other reasons include wildlife protection, rare plants and biodiversity. But the strongest argument for Alternative D is the Climate Crisis, the most urgent need facing society and our planet. Keeping our public lands as free as possible from human-caused encroachment and impacts is key to a livable future. That means reducing our carbon footprint and treading as light on the land as possible. Alternative D will help achieve this.

I am very familiar with the unmatched Wild Lands of the Custer Gallatin, having hiked, backpacked, fished and roamed with my family in every roadless area on the forest. I also have written several books about Montana Wildlands and for 25 years wrote a Wild Country series in Montana Magazine. These articles included the Crazies, Lionhead, Pryors, King Mountain as well as the Absaroka-Beartooth and Lee Metcalf Wildernesses. As an example I am attaching a

file (Crazy Mountains) which documents the outstanding wilderness characteristics of this spectacular island mountain range. Please include this as part of the official record.

I was one of the many co-signers of a letter supporting a 230,000 acre Gallatin Range Wilderness recently published in the Bozeman Chronicle. Wildlife security and biological corridors alone more than justify this proposal. The Gallatins remain as the largest expanse of unprotected Wild Country in the northern Greater Yellowstone Ecosystem. This along with its importance for elk migration and critical grizzly habitat make the Gallatin Range internationally significant. Making boundary concessions for mountain bikes is simply wrong. Studies have shown elk flight response from mountain bikes at 1640 yards--nearly one mile! The most important wildlife habitat in the range is in the Buffalo Horn-Porcupine area, inappropriately omitted from the proposed Wilderness boundary in the Gallatin Partnership agreement.

Back in the 1980s I led a university group of students on a two week backpack along the entire crest of the Gallatin Range from Hyalite Canyon to Yellowstone. This was the first time any of the students had ever been to Yellowstone and they got there by hiking for two weeks! I still hear from some of them about the awe and wonder of that experience.

As is consistent with Alternative D the Forest Plan should include recommended Wilderness not just for the complete unloaded Gallatin Range (of which the 155,000 acre WSA is the core) but also for the Bridgers, Crazies, Lionhead, Pryors, Tongue River Breaks complex, as well as additions to the Absaroka-Beartooth and Lee Metcalf Wildernesses.

With respect to the Bridgers, this past July I was making an early morning ascent of Sacajawea Peak. Suddenly, bounding across the open tundra just below the summit were two wolverines. In my more than 60 years of wandering in the wilds of Montana I consider this my most wonderful and remarkable wildlife sighting. A 45,000 acre Bridger Mountains Wilderness on the fast growing northern doorstep of Bozeman would be most fitting.

With more than 30 alpine lakes and rugged elevation landscape the Crazy Mountains is an outstanding wilderness candidate. Using the checkerboard ownership pattern as an excuse to not recommend Wilderness is inconsistent with past history. The Rattlesnake Wilderness next to Missoula is a case in point. Another example

closer to home is when the Forest Service pushed for land exchanges to make Big Sky possible so why can't the same thing be done for Wilderness in the Crazies? Wilderness designation in concert with consultation with the Crow Nation would safeguard the integrity of this magnificent wild land.

Another incredible example of superlative wild country is found in the Pryors. The Lost Water-Crooked Creek RA should be recommended to include the Big Pryor, Punch Bowl and Bear Canyon drainages. An astounding 40% of all plant species found in Montana occurs here.

At minimum the existing recommended Wilderness in Lionhead should be maintained, again as a vital component of the Greater Yellowstone Ecosystem.

A Tongue River Breaks Wilderness should include the 3 exceptional Ashland District hiking and riding areas along the east side of the Tongue River: Tongue River Breaks, King Mountain, and Cook Mountain. I've roamed all three while hunting turkeys during the spring but mostly I enjoyed just roaming through that marvelous rolling pine-clad country with its wild canyons and grassy parks.

There are a number of key additions to the Absaroka-Beartooth suitable as Wilderness. These include the Line Creek Plateau, with its Research Natural Area, extensive alpine tundra above 10,000 feet elevation, and lakestudded cirque basin. In addition to those recommended in the current Forest Plan other worthy additions to the A-B include Dome Mountain, Chico Peak, East Rosebud to Stillwater, and Red Lodge Creek.

Proper interim management of recommended Wilderness prior to designation by Congress is crucial. TO TRULY SAFEGUARD THE WILDERNESS CHARACTER AND SUITABILITY OF RECOMMENDED WILDERNESS THEY MUST BE MANAGED AS WILDERNESS, THAT IS FOR FOOT AND HORSEBACK TRAVEL; NO MECHANIZED OR MOTORIZED USE.

Thank you for this opportunity to offer comments on the draft Forest Plan. I would appreciate being kept up to date as you progress toward a final plan.

Sincerely,

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