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Comments: Forest Service

Attn: Forest Plan Revision

Custer Gallatin National Forest

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To Whom It May Concern:

The Montana Chapter of Backcountry Hunters & Anglers (MT BHA) would like to submit the following comments to the Custer Gallatin National Forest in regard to the public comment period for the Draft Revised Forest Plan. MT BHA is an organization of over 3,000 outdoors men & women dedicated to protecting public land access, expanding hunting opportunity on public lands and being the voice of our shared wild public lands, waters and wildlife.

MT BHA is a charter member of the Gallatin Forest Partnership (GFP) and offer our continued support for the comments submitted by the GFP during this comment period as well as the recommendations made within the agreement as they pertain to the Gallatin Range and portions of the Madison Range as it was submitted. MT BHA recognizes that as the Gallatin Valley continues its unprecedented growth it is important that the Custer Gallatin Forest Plan is clear and concise when making recommendations for the management of the forest on into the future. In the face of this growth it is important to balance recreational use with the needs of the wildlife and watersheds found within the CGNF.

For those areas outside of the GFP Agreement, MT BHA finds that it is imperative that we find ways to focus on the needs of the wildlife that call the CGNF their home. Fracturing of habitat and landscapes with dissimilar Recreation Opportunity Spectrum (ROS) designations can have negative long-term effects on wildlife populations that are continually facing pressure through human-wildlife interactions and climate change. In many cases, the designations and recommendations made in Alternative D meet the common values held by our membership for protecting the wild lands, waters and wildlife that we love.

In addition to our support of the GFP Agreement we also have some areas of specific concern that we would like to address.

2.4 Benefits to People; Multiple Uses and Ecosystem Services

2.4.16 Recreation Settings Recreation Opportunity Spectrum (ROS)

MT BHA would like to emphasize comments made by the GFP in regards to electric bikes and their suitable use.

We would like the forest plan to reflect the fact that E-bikes are motorized recreation.

FW-DC-ROS 03, 05 - We would like e-bikes to explicitly be listed as not suitable forms of recreation for the primitive (P) and semi-primitive non-motorized (SPNM) recreation settings.

FW-DC-ROS 07, 09, 11 - We would like e-bikes to be listed as an acceptable form of recreation in the SPM (semi-primitive motorized), RN (Roaded Natural) and R (Rural) recreation settings.

2.4.23 - Recreational Opportunities- Dispersed Recreation (RECDISP)

Many MT BHA members enjoy utilization of the CGNF for target shooting in preparation for upcoming hunting seasons, however we also find ourselves organizing community cleanup events often focused on recreational target shooting locations. The fact of the matter is that the general public abuses the forest when it comes to target shooting. Often leaving casings, shotshells and target debris behind. MT BHA would like to see the CGNF

put an emphasis on developing formal target shooting facilities to drive use towards specific locations. To this end, we believe it would be reasonable to add a goal to FW-GO-RECDISP (which is mislabeled as FW-DC RECDISP) to the effect of "The forest will designate and develop one target shooting facility within each ranger district."

#### 2.4.25 Recreation Opportunities-Outfitter Guides (RECOG)

MT BHA is a firm believer in the use of the best available science when evaluating recreational uses and their impacts on the ecology of the forest, including but not limited to impacts on wildlife, riparian areas and watersheds. With that said, we fear that there are components of the Forest Plan that are negatively biased against pack goats. While we fully support the prohibition of the use of pack goats as they present an unknown danger to Bighorn Sheep populations, it is also important to leave room for changing information to influence the use of pack goats. There is a lack of scientific evidence that pack goats are a vector for disease transmission to Bighorn Sheep and this lack of knowledge is what is driving the prohibition of their use. To this end the standard presented in FW-STD-RECOG 01 Alternative E appears to be the most reasonable balance that leaves the door open for future research to either demonstrably show that pack goats do or do not present a threat to Bighorn Sheep.

#### 2.4.33 Emerging Recreational Technologies (RECTECH)

MT BHA would again like to emphasize the need to add clarifications to the forest plan around the emerging technology of electronic bikes. We would like to see the RECTECH section contain a suitability plan component that clearly states the all e-bikes (both pedal-assist and throttle-assist) are motorized vehicles and are only suitable on designated motorized routes and trails. A recommended suitability plan component could read

"Electric bicycles are not suitable for use outside of designated motorized routes"

An additional desired condition plan component should read

"Electric bicycles, regardless of motor size (watts) or method of propulsion are defined as motorized recreation"

### 3.3 Ashland Geographic Area

Alternatives A through D are well-aligned with MT BHA priorities, while Alternative E loosens travel restrictions on the three small areas of the Custer National Forest that are not currently heavily roaded. Alternative C has the virtue of maximizing roadless. Compared to Alternative C, Alternative D calls for slightly less roadless, but Alternative D opens the possibility three truly unique off-road areas will eventually receive Wilderness status. The Suitability plan component AL-SUIT-ABCA for the Ashland Backcountry Areas (ABCA) needs to be reworded to be more clear and concise. It would seem that the intention is to say that the ABCA are no suitable for both motorized and mechanized use, but the way it is currently worded is open to interpretation to indicate that it is not suitable for motorized but is suitable for mechanized use. This wording appears to be copy/pasted throughout other portions of the Draft Plan and should be addressed in all areas.

#### 3.5 Absaroka Beartooth Mountains Geographic Area

It is extremely concerning that all 5 Alternatives have a summer/winter ROS of RN from the Box Canyon Trailhead on the Main Boulder River all the way up through Independence and on to Blue Lake. With the increased recreational use of this area there are severe negative impacts on wildlife. Summer traffic through the corridor is downright dangerous and should be limited to SPM if not rolled all the way back to SPNM.

Further, the winter designation is of the most concern. This area is being heavily used by snow machines and the boundaries of the surrounding Wilderness are not being respected. We have concerns about illegal use of snow machines in pursuit of Bighorn Sheep as this area is one of the unlimited sheep units designated by FWP - offering opportunity to anyone who puts in for the tag (100% draw rate). We have anecdotal reports from membership of snow machine tracks running south along the ridgeline from Monument peak, as well as reports of wolf and coyote tracks using the trails made by snow machines as means of accessing wintering sheep in the area. There are additional reports of snow machine tracks running to Lake Abundance and Horseshoe Lake.

The basic problem that we see here is the Roaded Natural designation of the trail from the Box Canyon trailhead all the way to Blue Lake is an invitation for illegal use of the surrounding Wilderness. It is largely unenforceable and illegal use is harmful to the wildlife that calls this area home. The lack of range of alternatives should be addressed by offering an change in the ROS for the trail from the Box Canyon trailhead headed south to Blue Lake. We recommend a summer ROS of SPM and a winter ROS of SPNM.

### 3.6 Bridger, Bangtail and Crazy Mountain Geographic Area

#### 3.6.11 Plan Components West Bridgers Backcountry Area (WBBCA)

Four of the five alternatives for the West Bridgers designate SPM access on all public trails on the west side of the Bridgers. While we recognize that this is traditional use we feel it would be more suitable to offer primitive access on at minimum two of the public trails to limit the amount of conflict between mechanized and motorized users with wildlife.

We understand that our next suggestion would be a part of the travel planning process. However, we find it necessary to address here as well, in order to best illustrate our concerns. The seasonal openings of these routes, through the archery deer and elk seasons likely contribute to pushing target species either down to the valley floor (especially in the Truman Gulch/Bostwick creek area) on to private land where they are no longer accessible to public land hunters, or high into the upper reaches of the range. We suggest a seasonal closure to motorized and mechanized use that ends on the last day of August rather than through the middle of October. This will increase opportunity for hunters and reduce conflict with wildlife that is preparing for the coming winter.

#### 3.6.12 Plan Components Crazy Mountain Backcountry Area

The Crazies are a Nationally significant Montana mountain range with limited access. MT BHA members hunt, fish and hike in the Crazies, and believe that Alternative D will best protect the wild character of this big country. Much of the wildlife in the Crazies exists in the foothills and lower canyons. Prohibiting motorized and mechanized travel will help ensure that big game has secure habitat on public land.

Access to the Crazies is a growing concern. Montana BHA strongly encourages the CGNF to do its utmost to preserve and defend any and all legal access points where the public can reach USFS lands in the Crazies.

### 3.7 Madison, Henrys Lake, and Gallatin Mountains Geographic Area

Once again we feel it is important to reiterate that MT BHA, as a charter member of the GFP fully supports all recommendations made by the GFP as they pertain to this geographic area. Some points of emphasis are as follows:

MG-STD-BHBCA 01 - First off, this component is listed as FW-STD-BHCBA which appears to be a typo and should be referenced as MG-STD-BHCBA. Secondly, this area is littered with non-system trails and there should be a special emphasis on preventing new roads as presented by Alternative C.

MG-DC-HREA 01 - We would like to echo the comments of the GFP that indicate that this standard should read "construction and designation of new motorized trails shall not be allowed".

For portions of the geographic area outside of the terms of the GFP agreement, we recommendation the following:

MG-SUIT-CDNST 04 - In order to be able to include recommended wilderness in the National Wilderness Preservation System it is imperative that the suitability standard presented by Alternative D is in the final Forest Plan. Plain and simple, mechanized use does not belong in the recommended wilderness.

MG-SUIT-LHBCA 01 - The north/south division of the Lionhead Backcountry Area as proposed in Alternative C presents a fractured landscape that can have a negative impact on wildlife. It is our desire to see the entirety of the Lionhead Backcountry Area be designated as Recommended Wilderness with an ROS of Primitive in both summer and winter. The presence of a singular route for mechanized travel connecting to a much larger area of SPM to the east will serve as a pinch point of activity, funneling a much larger use into the fractured landscape

increasing the division between the northern and southern areas.

Additionally the inconsistencies in ROS between Alternatives A & B vs. Alternative C for this area is concerning. By placing an ROS of SPNM on the Lionhead Backcountry Area as Alternatives A and B propose seems to be in conflict with this area also being Recommended Wilderness. We fear that a ROS of SPNM would preclude this area from eventual inclusion in the National Wilderness Preservation System.