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Title:

Comments: I am 63 years old and the Crazies have largely remained the same during my lifetime. Yes, they have suffered some devastating and huge clearcuts in the Upper Shields and in the lower portions around Big Timber Canyon and south of there. A mining scam punched a road in a mile into Big Timber Canyon, and the Stan Clark Road and a Salvage Timber Sale have damaged the wild quality of Cottonwood Canyon directly opposite on the west side. It would have been better if these damages did not exist, but none have as yet ruined the remote, primitive, wild character of this tiny yet staggering mountain range. Importantly, much of the threatening developments have been on hold for the last 33 years.

Why have the Crazy Mountains persisted as de facto wilderness even though they have not received legal Wilderness protection? Much of the reason has to do with the rugged character of this stupendous range of mountains. Some of it has to do with the private in holdings on the east side of the Crazies whose owners do not allow mechanized or wheeled traffic on the trails. For their stewardship in that regard, I'm thankful. Most of the reason why the Crazies have persisted as a de facto wilderness of outstanding quality (according to the Wilderness Area Rating System used to systematically rate its visual quality, opportunities for solitude, uniqueness, and so on that was used to rank the Crazies in the 70s and 80s and previous Forest Plan, I believe) is attributable to the lawsuit which prevents the Crazies' wild roadless land from being logged and roaded and otherwise developed. If the Forest Service had been able to execute the current 1986 Forest Plan (Alternative A) the Crazies wild, primitive, and character would have been lost because of loss of the roadless area in Cottonwood Canyon, around Porcupine Guard Station, the South Shields, and Sunlight Creek as well as around Two Moon Campground. The integrity, wildness and remoteness of this range would have been destroyed by the 1986 Forest Service Plan itself. What a relief that this travesty has been put on hold!

Much has happened since 1980. Gallatin County, as other wilderness counties including Park County, has seen a quickly expanding population of younger people who are especially interested in the outdoors. Montanans have come to value outdoor recreation more, and they have come to understand and experience its increasing economic value. Montanans have come to treasure our wild and cultural landscapes and know how fragile and vulnerable they are. More of us have known the loss of great places and we strenuously resist any more of these losses. And we understand far better the ecological connections and vulnerabilities. The nation as a whole, as Holmes Rolston and Albert Borgmann point out, has undergone an "environmental turn," an environmental ethic is struggling to emerge full-blown.

The Forest Service nationwide and the Gallatin Custer itself has supposedly moved from a crude utilitarian calculus to a "ecological" approach. In 1988, the US Congress found that The Crazy Mountains were of such outstanding wilderness quality that they were given a special status in the Montana Wilderness Bill. They were included as a "Land Consolidation Study" in this Bill that was passed by the U.S. Senate and US House of Representatives but later pocket vetoed by Pres. Reagan. Land Consolidation with a view to Legal Wilderness was the guiding intent of Congress, and it should be the direction which should now be pursued the new Forest Plan.

The Montana wilderness Bill of 1988:

10/18/1988 S2751

Sec. 10. (a) (1) The Crazy Mountains Land Consolidation Study Area in Gallatin and Lewis and Clark National Forests, Montana, comprising approximately one hundred nine thousand five hundred acres, as generally depicted on a map entitled "Gallatin and Lewis And Clark Land Consolidation Study", dated October 1988, shall, notwithstanding any other provision of this Act, be managed in accordance with the provisions of Public Law 95-150. The Forest Service shall complete a study of public and private land consolidation alternatives for this area and shall transmit such study to the Committee on Interior and Insular Affairs of the United States House of Representatives and the Committee on Energy and Natural Resources of the United States Senate no later than

In light of all these developments of the past 33 years, one would expect the Gallatin Custer Forest Plan would have also substantially changed. One would expect to find a fresh look at these very special Mountains. One would expect to find an alternative that most suitably allows them a chance to remain as they are, as so many people have requested. Alas, no alternative - A, B, C, D, E - grants the public a chance to get behind something that will really preserve the Crazies from ruin, from ruin for this remote, fierce and beautiful range.

Anyone who has on the ground knowledge of Cottonwood Canyon or the South Shields or the Sunlight Lake trail understands that the same old 50 and 60s mandate to "get out the cut" still rules the underlying design of the Forest Plan for the Crazies. By comparing the maps of the 1986 Forest Plan with the current Draft Plan's Wilderness Alternative (Alternative D), it's obvious, absolutely obvious, that any suitable timber in the present Roadless Areas of the Crazies has been left outside of the boundary of the so-called wilderness alternative, alternative D. The care and convenience of this design at least has a strong "appearance" of deception on the part of the Forest Service toward the public. We just do not live in a world in which wilderness is never sacrificed when logging takes place in areas of de facto wilderness, especially in a range of mountains as isolated and small as the Crazies. The Forest Service intent to "get out the cut" and have wilderness, too, in the Crazies fools everyone who has not looked very, very closely at the maps. It's just too extraordinarily convenient and coincidental. The public deserves to know exactly what is being preserved and what is being lost, and they need to know how much exactly this range will not remain the same and will never again, will never again, be allowed to be as wild remote and beautiful as they presently are. We are flooding our Muir's Hetch Hetchy Valley; we are destroying our Ed Abbey's Glen Canyon in our backyard. The Forest Service needs to be upfront with the public with regard to what is about to occur on our public land.

Allow me to be absolutely clear. I favor the kind of protections that Alternative D grants, that is, Legal Wilderness protection, but I also object strenuously to the boundaries of Alternative D, as I have argued above. I support Legal Wilderness Protection of all the present roadless land in the Crazies. The present Roadless Area of the Crazies should be the boundary for the Legal Wilderness Area. Grazing may occur, but no logging, road building, or mining. Foot travel, llama treking, pack animal, and horseback are appropriate but wilderness restrictions of other kinds of traffic should apply. To reiterate: I support legal wilderness protection of all the present roadless land in the Crazies.

## Problems with Alternative D boundaries.

- 1. Ecological. "Rock and ice" wilderness has long been criticized as not satisfactory protection of wild lands. The forested canyons, valleys, and foot hills are vital to the Crazy Mountain's ecological biodiversity and integrity. More strongly, these forested areas are more ecologically important than the rock and ice portions. Very few birds would fledge in the protected regions, for instance. One would think that the new Forest Plan, approaching things from an ecological standpoint, would note this importance and substantively guide its boundary decisions by it. I don't see how concern for biodiversity, integrity, and other scientifically's nuanced concerns made a difference at all.
- 2. Trail system. What is the significance of this exclusion? There are four major trailheads on the west side of the Crazies: Cottonwood, Porcupine, Sunlight Lake, and Rock Creek. The first three of these trails will be severely damaged.

For instance, the wild roadless forest of Cottonwood Canyon on the way to Cottonwood Lake will be logged. Over 2 miles (or half) of the Cottonwood Lake trail will be lost or it will pass through clearcuts where there is now a wild and beautiful canyon.

Porcupine Access trailhead, just east of Wilsall, will lose what is now a splendid and only loop trail through the Crazies. Presently people from this trailhead can hike into Campfire Lake via Elk Creek, follow Sweetgrass Creek down and catch an east-side trail into Sunlight Lake, take the other Sunlight Lake trail out to the north, and, near

its trailhead, catch the South Fork of the Shields trail, returning to the Porcupine Trailhead. I've done the loop in one very long day, but it's best to spend four or five days, exploring the streams and canyons and Glacier Lake. What better way to enjoy the lakes, streams and peaks of the Crazies? And yet all of the northern connections of the loop will be entirely lost if the Roadless Area around the Porcupine Trailhead, South Fork of the Shields Trail, and the northern Sunlight Lake trail are unprotected and logged, as the so-called 'Wilderness' Alternative allows and is planned in the 1986 Forest Plan.

Three major trails lost? (And there is more I can't go into, such as the wild land around Half-Moon Campground being logged.) This is the "Wilderness" alternative in the Forest Plan? As I said, all the significant public decisions concerning the Crazies have already been decided. No selectable alternative proposal exists which suitably protects these wild mountains.

The Draft Forest Plan states that because of the checkerboard ownership, "trails are fewer in the Crazies." Above, I find there is a cause for fewer trails in the Crazies, namely the Forest Plan itself....

What we really need in the Crazies is a better system of trails, especially the low-lying trails in the foothills that would enable other hiking loops just like the one we may lose at the Porcupine trailhead. Why can't we have an alternative that includes these kinds of trails and trail planning? DO SOMETHING ON THESE PUBLIC LANDS THAT'S REALLY FOR THE PUBLIC! GIVE US A CHOICE, A MEANINGFUL CHOICE. Then show us why the Forest Service is impotent to carry it out if that's the argument.

- 3) What many people find attractive about this range is its remote and primitive character. You can manage to get around in it without trails. In many situations there are no need for new trails. But if Cottonwood Lake and the lake before it are any easier to access, that will compromise this remote and primitive character. If section 9 and the other lower down sections of Cottonwood Canyon are left out of the wilderness boundary, this will remove the remote and primitive character of the place. Once public access roads are built to section 9 or in section 9, it will be a mere short walk to get these presently remote and primitive places.
- 4) As I have stated above, these changes to the mountains will transform them substantially. These changes do not leave the mountains as they are. The Crazies are more than the rock and ice that Alternative D boundaries protect. The only way to protect them as they are is to use the entire roadless area boundaries.
- 5) Alternative D, ironically, protects a very reduced place unworthy of wilderness protection.
- 6) Importantly, these changes will be irreversible. Roads can be ripped and restored, but logged areas cannot. The Forest Service should make every effort to avoid irreversible changes to the Crazies.
- 7) And I might add, the amount of timber in these wild places would last the sawmill only a few months. If calculations are made regarding how much volume of wood a sawmill uses, it's mill capacity, against what is available in the Crazies through those timber sales, especially of roadless area lands, then that volume will last the mill very, very few months.

Another reason we need that Crazy Mountains protected as legal wilderness with all their present roadless area. The last general point I will be making in a more complex fashion. The Crazies are a place of vision, both traditionally for the Crows (on the east-side at least) and for non-native Americans, too. Only protecting the Crazies roadless area as it is today will assure us of this place-of-visions character.

The Forest Service is to be commended for reaching out to the Crows and acknowledging the right of these mountains to remain a place of visions and that certain kinds of developments, such as logging, conflict with this place is a place of visions. I fully concur with this direction and would hope that the Forest Service has consulted with a variety of members of the Crow tribe regarding this matter. I have camped in these mountains with Burton

Pretty on Top three of decades ago and know how important they are to him. At that time, Burton had gone on one vision quest in the Big Timber Canyon watershed. Since then I have witnessed a number of vision quest sites. Protecting the Crazies as a place of visions for the Crow people and for non-native wannabes should be a top priority.

The Forest Service should not restrict the religious/spiritual to Native Americans and wannabes alone. Dating back to our American ancestors, such as Ralph Waldo Emerson, we non-native Americans also see wildland as sacred and our relationship to it as religious and spiritual, even if secular. The great promise of American wilderness is that it will establish a renewed religious sensibility, in a general and deep sense. We European Americans traditionally have our own way of questing vision in wilderness. Emerson and all who follow him such as Thoreau, Muir, Gary Snyder, Jack Turner, Bill McKibben, Henry Bugbee, and Albert Borgmann, and myself look at wilderness as a place to seek, in Emerson's words, "an original relation with the universe." [The foregoing generations beheld God and nature face to face; we, through their eyes. Why should not we also enjoy an original relation to the universe?] Such original relation is to be sought through deep firsthand encounters with wild nature in remote and primitive settings.

Most directly in line with Emerson, for McKibben, genuinely wild nature offers something that we can point out to others as "some larger-than-human force" at work in the world and wild nature generates a sense of rightness. Wild nature promises joy of the highest kind, the kind that satisfies as "enough" our deepest spiritual nature and teaches us limits having to do with "enough" as well.

For Jack Turner, as a kind of secular prophet from out of the wilderness, a necessary condition but not sufficient condition for finding this original relation is the presence of actual and substantial remote, primitive, wild places such as the Crazies left to be as they now are. Deep encounters, real contact, with these places engenders the kind of experience for real vision. "If anything is endangered America it is our experience of wild nature -- gross contact."

For Thoreau, "Our village life would stagnate " were it not for the wild places where we can encounter "the tonic of wildness." This revitalized life and fresh vision he deems necessary to keep the meaningful life of America alive, from being merely received (and going stale) from the tradition. "In wildness is the preservation of the world."

For Henry Bugbee, wilderness is a place where we can quest for a vision of the highest reality, a reality we would do well to recall and keep in sight as we go about our everyday lives outside of wilderness.

For Albert Borgmann wilderness is a place where we can recontact and experience divinity. We learn about what's sacred, what it means to let something be (like the Crazies) in its own splendor. We can learn perhaps not of the highest realm of divinity but divinity nonetheless, and can begin to reclaim what it means to revere something. (I learned something on this order, too, from Burton Pretty on Top during a pipe ceremony he performed at dawn.)

For myself, I have written a book, Crazy Mountains: Learning from Wilderness To Weigh Technology, showing how this particular mountain range can help us to attain a clear vision of how technology relates, and should relate, to the very center of our lives. As a genuinely wild place these mountains are the place of vision and can serve signpost for our time.

America needs its genuinely wild land for these cultural and religious reasons just as much as the Crow need them. Wilderness is just as sacred for ourselves and the prophets of our Western cultural tradition as they are for the traditional Native American vision quests like Plenty Coup for the Crow. It takes the Crazy Mountains preserved in their full splendor--as remote, isolated, vitally alive, and wild as they presently are--in their full de facto wilderness to be this place of visions. Please protect them in the way I've described..

Whatever "Backcountry" is (I can't find it in the glossary or as a traditional concept such as legal wilderness and the Forest Service literature) it does not protect these lands from roads and logging, nor from mechanized and wheeled traffic. These latter are opposed to the kind of space, sacred space, that needs to be taken in step-by-step, walking or at most with running and horses. Walking gives us a sense of space on a bodily-scale entirely different from virtual space, the kind of collapsible space that runs from motorcycles to the Internet. We need this kind of space protected if we are going to protect the Crazy Mountains as a place of visions and real contact with real things. It's really what the wilderness Act intends. Therefore I oppose Alternative C and I do not find its boundaries satisfactory either, for my reasons stated above. Alternatives A, B, and E are worthless.