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In keeping with our mission and desire to protect the values inherent to the Absaroka-Beartooth Wilderness, we, the members of the board of the Absaroka-Beartooth Wilderness Foundation (ABWF), have discussed our role as a group and feel compelled to provide you with input on the proposed Forest Plan-a document that will guide the Custer Gallatin Natiqnal Forest's management of wilderness for decades to come.

While many have focused on the proposed Wilderness section of the Forest Plan, our comments tend more towards including more robust wording that better delineates what should and should not be allowed, and maintains the character .of Wilderness like the Absaroka-Beartooths that have already been designated.

Thank you for considering the following comments on the Custer Gallatin Forest Plan proposed action.
[middot]

Wilderness Character Maintained: The ABWF is, first and foremost, concerned that in the revised Forest Plan, wilderness character is maintained or enhanced. It is critical, in our opinion that wilderness management and the language in the management plans follows carefully the five key qualities of Wilderness as defined in the 1964 Wilderness Act: 1) is.Untrammeled; 2) remains Undeveloped; 3) is Natural; 4) offers Solitude and opportunities for primitive and unconfined recreation; and 5).may[middot] contain ecological, geological, or other features of scientific, educational, scenic, or historical[middot] value. The current draft of the Forest Plan contains language about desired conditions that is NOT succinct and could be improved by the more direct wording following the five qualities of Wilderness identified above .

The Need for a Wilderness Plan for the A-8 & Lee Metcalf Wilderness Areas: There are not currently up-to-date wilderness management plans for the A-B & Lee Metcalf Wilderness areas. The current plan dates back to 1987 and is in need of replacement.

When the plan is replaced with this new version, the Absaroka-Beartooth and Lee Metcalf plans will no longer officially inform management practices. It is not clear to us that the new Forest Plan intends to assimilate what was already there in the Wilderness Management Plan and thereby replace it, or if the Wilderness Plan will remain a separate document, to be finished and implemented in the near future. If the intent is to replace it with this Forest Plan, it would therefore seem crucially important that the new Forest Plan contain more robust language that provides appropriate guidance to protect wilderness character. Other Forests in our Region that contain major wilderness areas-the Bob Marshall complex, the Selway-Bitterroot, and Anaconda-Pintlers-have far more recent wilderness plans that define management strategies to maintain wilderness character, and even have built-in thresholds that identify when unacceptable changes are occurring. The A-Band Lee Metcalf Wilderness areas don't have that, and need it!

We would argue for completion of the separate wilderness management plan. It would seem that if, in the future, changes were in order overseeing the management of wilderness, the wilderness plans for the A-Band Lee Metcalf would be the documents that are more easily amended, rather than making changes to the entire Forest Plan.

For instance, we believe that party-size in the two Custer Gallatin Wildernesses should be brought down in total number from the 15 person limit that currently exists, and wonder if changes on that level are more efficacious on the Wilderness Plan rather that the overall Forest Plan.

The wilderness plans for the Absaroka-Beartooth and Lee Metcalf wildernesses we feel should be revised and implemented soon after the Forest Plan is published. We feel there is a need to provide clear and unambiguous standards used to measure change to wilderness character. Without this direction there will be no document that guides managers or the public and that lays out specific strategies for maintaining or improving wilderness character. More than a third of the Custer Gallatin NF is designated Wilderness, so a specific wilderness plan is a big deal.

We would like to see the Custer Gallatin National Forest implement a timetable for completing the Wilderness Management Plan within a reasonable time following adoption of the latest Forest Plan.

Untrammeled: With regards to Wilderness, "Untrammeled' means something is free or unrestrained; "not being subject to human controls and manipulations that hamper the free play of natural forces," according to Zahniser himself. The current language in the Untrammeled section of the draft Forest Plan does not go far enough to ensure that wilderness managers will needfully exercise restraint. Each of the management Zones should contain language about the sorts of actions that should or should not take place, and they should allow the Forest Service to take actions to restore wilderness character in areas where it has been compromised. There will be increasing pressure on the agencies that manage wilderness in the years to come that will challenge them to assert actions and manipulations in areas that will compromise their wilderness integrity. The pressure to stock non-native fish in certain areas of the A-B Wilderness is an example that comes to mind. Solid wording that supports the true spirit of 'untrammeled' is needed. The current definition of Zone I, (which is the most pristine zone in wilderness) lacks specific wording, for instance, that there shall be no system trails within Zone1[shy] Without that constraint, it is left open that trails could be constructed in the most pristine areas of the Wilderness resulting in loss of essential wilderness character.

Mechanized Travel: The Forest Plan should establish a standard that clearly prohibits mechanized travel in designated Wilderness. The proposed Plan talks about "lack of _

suitability" for motorized and mechanized travel in Wilderness and leaves the door open for compromise. We feel it would be far more impactful to simply say "it is not

permissible" to allow bicycles in Wilderness. It needs to be that explicit.

Maps: It is difficult to read and understand wilderness boundaries, recommended Wilderness, and management zones on the current Forest Service maps. Maps need to be provided that clearly show the boundaries of these Wilderness Zones that more clearly represent the CGNF's management strategies.

Thanks for considering our comments on revising the Custer Gallatin Forest Plan!