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Comments: I was glad to see wilderness recommendations for Nevada Mountain, Electric Peak, Big Baldy, Red Mountain, etc. However, all of these should have expanded boundaries. But I am concerned that the Forest Service failed to protect many other deserving roadless lands.

I object to the following recommendations of the forest plan. I have visited all the areas I mention below and have spent considerable time hiking, camping, fishing, and hunting in some of them.

There are elements of all the roadless lands below that merit their recommendation as wilderness. First, roadless lands designated as wilderness preserves ecological processes. They provide a counterpoint or reference point from which we can measure the effects of human manipulation and management on other lands[mdash]in that sense, they serve as a "control," which is essential in any scientific experiment. And we are experimenting with the rest of the land, for we don't know what or how things like climate change, loss of biomass (by logging), intensive recreation, and other measures will impact the ecological processes that maintain our ecosystems.

Wilderness designation is the Gold Standard for conservation, and thus it behooves us to protect as much of the Forest as possible as wilderness. The HLC forest, due to its overall aridity, is not the Nation's woodbox. It's not the Nation's feedlot. What it does better than almost any other national forest in the Nation is to provide large areas where a natural ecological process can remain viable. Therefore, the FS has a special obligation to view this from a national perspective. There are many other places to log trees, especially on private lands. There are better places to graze cattle. Different areas can serve as outdoor gymnasiums for mountain bikers and ORVs. I am particularly troubled that mountain bikers, in particular, make rogue trails without any analysis or oversight from the Forest. These trails should always be deemed illegal and never authorized. The Forest Service needs to do a full EIS on any new trail. Recreation impacts are a thousand cuts, and the cumulative results can be significant.

With that in mind, I believe the HLC needs to recommend far more areas as wilderness. Below are my comments.

1. I object to any reduction of acreage in the Big Snowy Mountains WSA. The entire roadless lands of the Big Snowy Mountains WSA, as defined by S. 393, should be managed as recommended wilderness. In the legislation, Congress mandated (using the word shall) that the FS should achieve this area to "maintain" its wilderness character. Allowing mountain bikes, ORVs., etc. to use any portion of this area is, in my view, a violation of this mandate.

2. I object to any reduction in the acreage recommended for wilderness in the Middle Fork of the Judith. As above, I believe Congress's intent is for the Forest Service to maintain wilderness character. Since ORVs, mountain bikes, etc. are not permitted in wilderness, and indeed, mountain bikes did not even exist in 1977, it behooves the FS to recommend and manage these areas as wilderness.

3. I am also dissatisfied with the recommendations for the Little Belt Mountains. There are 14 roadless areas, and the FS could not find a single one to recommend for wilderness? This challenges credibility. Among the more significant areas that the FS should recommend for wilderness are the following roadless areas: Tenderfoot Deep

Creek area, Pilgrim Creek, Big Baldy, Tollgate, and the aforementioned Middle Fork of the Judith. These roadless areas as a complex would create a larger "whole" and a wildlands complex that could ensure ecological processes would continue.

4. I am also objecting to the lack of any recommended wilderness in the Elkhorn Mountains. The Elkhorns were once considered for wilderness as part of the S. 393 bill, but a compromise to protect the area as a wildlife area was reached. However, the FS is failing to protect the wildlife habitat by allowing a growing number of mountain bike incursions and new trails. Also, thinning projects threaten the ecological integrity of the area. The FS should recommend the entire roadless component of the WMA as a recommended wilderness.

5. I object to the proposed management for the northern end of the Crazy Mountains. The area around Loco Peak should be recommended wilderness. There is an on-going effort to protect the entire roadless lands on of the Crazies, including lands on the Custer Gallatin NF side of the range. The Crazies are among the most spectacular mountain ranges in Montana and deserve wilderness protection.

6. I also object to the exclusion of the Camas Creek area in the Big Belts from a recommended wilderness. The Big Belts, in particular, are potentially a migration corridor for wildlife moving from Greater Yellowstone to the Bob Marshall/Glacier Ecosystem. The Belts deserve more protected landscapes.

7. The Rocky Mountain Front received the highest rating during the RARE11 process, the one part of the lower 48 states that the FS suggested rival Alaskan wildlands. With that in mind, the entire Rocky Mountain is a national and international treasure. It has when combined with the existing Bob Marshall/Glacier complex, the most extensive wildlife habitat left in the lower 48 states. This area should be a priority for wilderness. Therefore I object to the existing conditions and forest recommendations and ask that the FS recommend wilderness for the Badger-Two Medicine area, along with the other roadless lands further south, including the Sawtooth, Bear-Marshall-Swan-Scalpgoat roadless lands identified on the Forest map or what is now the Conservation Area of the Front. There is no better place to promote wilderness as a designation than the Rocky Mountain Front.

#### ELK SECURITY COVER

I object to any revision of elk security cover from the previous forest plan. Elk require places where there is little disturbance. These sanctuaries also provide a secure habitat for many other species.

#### LIVESTOCK GRAZING

I object to the lack of grazing permit buyout as an option for reducing conflicts on the Forest. A voluntary permit buyout would allow ranchers to give up grazing privileges (they are not rights) in exchange for private foundations or individuals' funds. These grazing areas would be removed from the forest livestock grazing base.

I also believe the FS should close all vacant allotments and remove them from the grazing base. Given that many of these allotments are no longer in use, this seems like a reasonable expectation.

I am also concerned about sheep grazing near bighorn sheep herds. The Forest should have a policy of removing or eliminating sheep grazing in any area utilized by wild bighorn sheep.

#### LOGGING

Although only 12% of the Forest is available for timber harvest and more under other excuses like forest health, these are the most productive areas of this arid landscape. Therefore timber cutting has disproportionate impacts on other forest values.

In many forest geographical subdivisions, the amount of land designated as suitable for timber harvest is far more significant than the land the FS recommends for wilderness. Frankly, this is insane. The HLC is arid. It's not a good place to grow trees. It is a good place for wilderness protection.

One of these values is carbon storage. The Forest has not given enough attention to climate change. The contribution that leaving Forest intact would serve a higher value to society for carbon storage than as wood products. Even burnt forests store more carbon than harvesting trees for lumber. The Forest Service needs to review its timber policies in light of climate change.

The FS does not give enough attention to the non-monetary impacts of logging. Removal of carbon. Loss of biomass (wildlife habitat), weed spread from roads, soil compaction, disruption of water flow by road cuts, loss of security cover and displacement of wildlife, loss of scenic values, and so on.

I propose the Forest Service set out standards for evaluating these "costs" and impacts for all proposed timber sales.

## FIRE

The Forest Service still acts as if high severity fires are the "demon." High severity fires are critical to healthy forest ecosystems. I would like the Forest Service to acknowledge these values. High severity fires provide episodic inputs of deadwood, snags, and other structures critical to many forest creatures. They also offer significant inputs of wood in stream ecosystems. Instead of viewing high severity fires as something to preclude or prevent, the FS needs to acknowledge they are a desirable feature of the landscape.

The FS also fails to acknowledge how climate/weather is more important for creating high severity blazes than fuels. All large fires burn when there is severe drought, high temperatures, low humidity, and, most importantly, high winds. There is evidence that thinning does not preclude such fires because high winds blow embers miles ahead of any fire front. The best way to protect homes is to reduce the flammability of the structures, not convert the Forest into sanitized woodlots. I want the FS to acknowledge that thinning the Forest is unlikely under extreme fire conditions to reduce fire spread. Indeed, there is a growing body of science that finds that thinning can exacerbate fire spread. The Forest needs to revise its assumptions about wildfire and act accordingly.