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First name: DON

Last name: BACHMAN

Organization:

Title:

Comments: I have previously commented on the draft plan, dated: April 10, 2019 and published on the USFS Forest Planning Web Site on 7/11/19. Prior to those comments I had submitted pre-plan comments on September 24, 2017 and on January 24, 2018. These comments were mailed to the Forest Plan Revision Team in the Bozeman office. I have attended and verbally remarked on the proposed plan at several USFS conducted public meetings in Bozeman. I am also familiar with the CGNF and have recreated on the public trust lands that are involved.

I wish to object to the exclusion of Bison as a Species of Conservation Concern. The Gallatin Range of the National Forest contains habitat that would be suitable for Bison were it not for management constraints in part endorsed by a working group of which the CGNF is a member. The determination of for a Species of Conservation Concern rests with the Regional Forester. This omission does not recognize the suitable habitat available for such wildlife.

I will concentrate the remainder of my comments on Alternative F which is preferred, and specifically the exclusion of the of what is described as the Buffalo Horn "Backcountry Area" which is a significant portion of the Hyalite-Porcupine-Buffalo Wilderness Study Area." The absence of other comments should not imply an acceptance of Alternative F as Forest Plan Direction.

I have previously referred to the report from November 2015 titled "Wilderness, Wildlife and Ecological Values of the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area" by the Craighead Institute, Frank Lance Craighead, PhD, November 2015. The Craighead Report "[hellip]is a review of existing data and literature what were available in 2015 pertaining to the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH) WSA [hellip]". This report was not included in the literature cited as reference for the development of the Forest Plan Revision. Yet the plan "was commissioned by the trustees of the Lee and Donna Metcalf Foundation to address the perceived need to gather all relevant science and data into one document to facilitate planning as the fate of the HPBH WSA was decided."

Under conclusions of this report on pg. 137 it is stated: "Basis on the data and information contained in this report, the HPBH WSA can be considered and intact 'ecosystem' or critical component of a larger ecosystem, the GYE, and as such should be protected from further human alteration and disturbance. This protection should be as restrictive of human uses as possible and should be as permanent as possible. This report was never utilized in determining the suitability for preservation as wilderness, by either the CGNF or incidentally, the Gallatin Forest Partnership.

This latter entity was formed in late 2017 though the leadership of staff from the Greater Yellowstone Coalition, The Wilderness Society, The Montana Wilderness Association, and the Winter Wildlands Alliance. I attended their formulative meeting at the Region 3 office of Montana Fish Wildlife and Parks and signed up to attend subsequent meetings. From that day on I and other Bozeman conservationists in attendance, remained uninformed as they continued to meet in Big Sky, expanding their membership to include outfitters, guides and others who represented Big Sky mechanized recreation interests. This is the exclusive group to whom the CGNF turned to in recommending a "backcountry" recommendation for a substantial portion of the HPBH Wilderness Study Area.

It is perhaps unprecedented that a group such as the GFP should be able to influence a public trust agency, in determining land management recommendations in the face of clear bias against previous land use decisions

which includes the recommendation in the November 2017 CGNF Process Paper: Wilderness Inventory Pg. 10: "The entire Hyalite Porcupine Buffalo Horn Wilderness is included in the Inventory". Further, the GFP did not limit its recommendations to land management actions. Under Outfitting and Guiding, recommendations it states in part that: "Thirty-five percent of the Forest Service's Region 1 outfitter and guides operate on the Custer Gallatin National Forest representing 175 outfitter and guide permittees." [hellip]continuing the "[hellip]the Forest Service outfitting permitting system is clogged up and the Custer Gallatin is no exception." This statement indicates that the GFP is not only making land management recommendations but administrative recommendations as well. Could it be that the elimination of the portions HPBH Wilderness Study Area ensures a more lucrative allocation of Guide and Outfitter Permits? Is that part of Forest Plan Alternative selection?

Further, returning to Forest Service guidance documentation under FSH 1909.12 Land Management Planning Handbook Chapter 70 - Wilderness -73- Analysis: "For each evaluated area or portions thereof that are not included in an alternative in the applicable NEPA analyses, the Responsible Official shall document the reason for excluding it from further analysis." This documentation is not presented for Alternative F in the case of the diminished acreage of the HPBH WSA.

The assignment of "Backcountry" as a use classification for the deleted portion of the HPBH WSA is puzzling as this term is not defined in the Plan Glossary, nor are its permitted uses displayed. Please clarify in your Record of Decision.