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Comments: Thank you for the opportunity to submit an objection. I have attached our objection as a pdf (WWA\_MBA CGNF objection.pdf) and would be happy to provide a hard copy upon request.

Objectors Winter Wildlands Alliance (WWA) and Montana Backcountry Alliance (MBA) file this objection to the Custer Gallatin Forest Plan revision Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS), noticed May 21, 2020. Mary Erickson, Custer Gallatin National Forest Supervisor, Responsible Official.

WWA and MBA filed timely comments on the Proposed Action and Draft Environmental Impact Statement (Draft EIS) for this Forest Plan revision on March 1, 2018 and June 4, 2019 respectively. We also helped to draft and signed on to comments submitted by the Gallatin Forest Partnership on March 5, 2018 (Proposed Action) and June 6, 2019 (DEIS) as well as those submitted by Outdoor Alliance Montana (OAMT) on March 1, 2018 (Proposed Action) and June 4, 2019 (DEIS).

There are many things in the revised forest plan that we support, and we see many elements from our earlier comments reflected in the plan. We appreciate that the 2020 Plan includes a winter-specific Recreation Opportunity Spectrum. We also appreciate that it prohibits motorized and mechanized travel in Recommended Wilderness Areas and includes objectives to eliminate unauthorized incursions into non-motorized areas and increase signage along Wilderness boundaries in order to reduce illegal incursions. Over-snow vehicle incursions into Wilderness on the Custer Gallatin is a persistent problem and we are hopeful that this new plan language will help the Forest Service to address the issue. We also appreciate that the 2020 Plan includes specific plan components for each Recreation Emphasis Area and Backcountry Area, in addition to the forest-wide plan components for each of these designations and we support the Recreation Emphasis Areas and most of the Backcountry Areas included in the 2020 Plan. Finally, as a member of the Gallatin Forest Partnership, we truly appreciate the Forest Supervisor's support for the Partnership and we recognize that the Forest Service has worked to incorporate many aspects of our Agreement into the 2020 Plan.

While there is much to like in the 2020 Plan, there are still some areas that need improvement before the plan is finalized. We offer the following objections and resolutions to improve the plan so that the Custer Gallatin National Forest is equipped with a Forest Plan that will help ensure this forest remains a special mix of world-class Wilderness, wildlife habitat, and outdoor recreation as it is today.

Objections

#### I. THE FOREST SERVICE FAILS TO PROPERLY APPLY THE RECREATION OPPORTUNITY SPECTRUM IN THE 2020 FOREST PLAN

As organizations that work in the intersection between conservation and outdoor recreation, we are very interested in how the Forest Service utilizes the Recreation Opportunity Spectrum (ROS) in forest plan revision. Under the 2012 Planning Rule, the ROS is intended to reflect desired future conditions. In addition, the forest plan must contain plan components to support the ROS. We have shared these thoughts with the Custer Gallatin National Forest (CGNF) before, specifically on pages 5-6 of our scoping comments and pages 10-12 of our comments on the DEIS. We also discussed the ROS on pages 2-5 of the Outdoor Alliance scoping comments and pages 5-6 of the Outdoor Alliance DEIS comments. We also shared information about important backcountry

ski zones in our scoping (pages 3-4) and DEIS comments (pages 3-11) [ndash] information intended to help the Forest Service determine desired future winter recreation opportunity spectrum settings and conditions.

In general, we are pleased with how the CGNF describes the ROS in the 2020 forest plan. Specifically, we appreciate that the Forest Service created plan components and maps for both winter and summer ROS settings. Likewise, we are pleased to see that the forest plan states what uses are (or are not) suitable for different settings.

However, we object to how the winter ROS is applied, as mapped in the revised forest plan. To frame this discussion, we would like to bring the Forest Service's attention to the recently-published Chapter 2310 [ndash] Sustainable Recreation Planning, within FSM 2300 (Recreation, wilderness, and related resource management). This chapter offers detailed guidance on how the Forest Service must utilize the ROS in forest planning. Our earlier comments referenced draft versions of this chapter, and we ask that the Final Plan be consistent with national direction.

As we have stated, repeatedly, the ROS is intended to represent desired future conditions. To achieve this, ROS mapping must be more than a GIS exercise [ndash] the Forest Service should thoughtfully consider what the desired future conditions for recreation settings, access, and infrastructure development are across the forest. It is, in our opinion, one of the most impactful and exciting aspects of forest planning. Therefore, we were very disappointed to review the winter ROS maps in the new plan and discover that for the most part, these maps simply reflect the status quo. Even more concerning, there are many instances where the ROS maps at best do not make sense, or, worse, reflect a [ldquo]desired future condition[rdquo] for the forest that is far different from the forest we know and love today.

For example, in this revised plan, Republic Mountain, outside of Cooke City, has been changed from a semi-primitive non-motorized setting to a combination of roaded natural and rural winter ROS settings. In the language of forest planning, this changes the "desired future condition" from (semi-primitive non-motorized - FW-DC-ROS 04) "provide backcountry and Nordic skiing, snowboarding, and snowshoeing opportunities. Trails are generally un-groomed and not marked for winter travel. Some areas that have enough compaction may see fat tire bike use. Rustic facilities, such as historic cabins and yurts may exist but are rare. These settings are free of motorized transport, but mechanized transport may be present on appropriately designed and constructed routes." to (roaded natural - FW-DC-ROS 10) "support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates sedan travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings" and (rural - FW-DC-ROS 12) "provide staging to adjacent winter settings and opportunities. These areas are accessed from paved and plowed roads and are generally close to population centers. Warming huts or other shelters, sanitation, and information and education are commonly present. Parking areas are large and plowed. Entry points and routes are signed and lead snowmobiles to adjacent roaded natural and semi-primitive motorized settings. Non-motorized trails are also typically groomed for skate skiing and cross-country skiing. Rural winter settings provide quick and convenient access for communities and families to celebrate holidays, conduct racing events, walk their dogs, or simply get some exercise." For anybody who is familiar with Republic Mountain, these changes simply don't make sense. Supervisor Erickson says it best, on page 14 of the Draft ROD - Republic Mountain is a [ldquo]rugged inaccessible landscape[rdquo]. While nothing is impossible, it seems highly unlikely that the Forest Service's desired future condition for Mount Republic [ndash] an inventoried roadless area - includes roads (paved, plowed or otherwise), warming huts, restrooms, and parking lots. Furthermore, these ROS settings conflict with the description of Wilderness characteristics in Appendix D of the FEIS, which states [ldquo]This area offers unconfined and primitive recreation opportunities especially noted for backcountry skiing [lsquo]The Fin[rsquo] on the side of Republic Peak.[rdquo]1 It also conflicts with the Gallatin Travel Plan, which emphasizes non-motorized winter recreation south of Highway 212 in the Cooke City area.2

1 Appendix A, FEIS Volume 2, page 244

2 Gallatin Travel Plan Record of Decision, page 43

Likewise, we fail to understand why the revised forest plan designates the current (1986 Custer Forest Plan) Line Creek Plateau Recommended Wilderness Area as roaded natural (summer) and semi-primitive motorized (winter). Although much of the area is visible from a road, it is primarily steep and rugged, and surely does not fit within the roaded natural ROS. Furthermore, while it would be difficult to take an over-snow vehicle into much of this area, the part of it that is accessible to OSVs is an incredibly high-value ski zone directly above the second switchback on the Beartooth Highway (known as Rock Creek headwall). Setting the stage for designating Rock Creek headwall, or any other part of this area, to over-snow vehicles (OSVs) in the future is irreconcilable with the non-motorized recreation value this area holds. Backcountry skiers are alarmed to see that the Forest Service's [desired future condition] for this cherished and historically important area is one that includes over-snow vehicle use.

Throughout this forest planning process, we advocated for a Bridger Recreation Emphasis Area on the east side of the Bridger Mountains, extending north to the Fairy Lake Basin. We are very glad to see this idea reflected in the final plan. However, a key part of our recommendation for a Bridger Recreation Emphasis Area has always been for the Forest Service to revisit winter ROS settings here, and elsewhere in the Bridgers. As we explained on page 11-12 of our DEIS comments, the travel plan has shown to be difficult to enforce in the Bridgers and use conflicts arise annually in predictable areas. Furthermore, OSV use is rare to non-existent in most places on the west side of the Bridgers and if it were to occur, would cause intense use conflict with winter hikers and skiers. Therefore, we asked that the Forest Service revise the winter ROS settings in the Bridger Range based on a more current understanding of use patterns, setting the stage for revising the Gallatin Travel Plan in this area. We also offered detailed suggestions for winter ROS settings in the Bridgers.<sup>3</sup> Thus, we were very disappointed to see that the winter ROS settings in the 2020 Plan for the Bridger Mountains are exactly the same as in the 1987 forest plan. Given the substantial changes in recreation technology, use patterns, and user numbers since 1987 it is almost inconceivable that the desired future condition for winter recreation opportunities and settings in the Bridger Range remains the same as it was in 1987.

3 For example, from page 11 of our scoping comments: [The west side of the Bridgers from at least Corbly Gulch and south should be semi-primitive non-motorized]

4 FW-DC-ROS 2 and 3, FW-SUIT-ROSP 1.

5 FW-DC-RWA 1-3

Finally, we object to the Forest Service applying a semi-primitive non-motorized ROS setting to recommended Wilderness areas. These areas should have a primitive ROS setting. This is supported by examining the language in the forest plan. Primitive settings are [large, wild, remote, and predominately unmodified landscapes] that often provide [secure wildlife habitat, naturally appearing vegetation, and clean water] and they are not suitable for motorized transport.<sup>4</sup> Likewise, under the revised plan, recommended wilderness areas are managed to maintain wilderness characteristics, provide outstanding opportunities for solitude or primitive and unconfined recreation, and are characterized by a natural environment where ecological processes function as the primary forces affecting the environment.<sup>5</sup> Recommended wilderness areas are not suitable for motorized or mechanized transport or other activities that are not [primitive]. The Forest Service's intent in recommending these areas for Wilderness is to manage them to retain their wilderness [primitive]- characteristics, to preserve opportunities for inclusion in the National Wilderness Preservation System. This is in complete alignment with the Primitive ROS setting, which is why every other national forest that we are aware of assigns a Primitive ROS setting to Recommended Wilderness Areas.

In the 2020 Plan, it appears that the CGNF has set a higher bar for recommended wilderness than what is currently found in designated Wilderness, in terms of the ROS. Page 354 of Volume 2 of the FEIS and page 91 of the 2020 Plan describe Primitive ROS settings as more restrictive than what is in the recently-published FSM 2300, Chapter 10 - Sustainable Recreation Planning. The CGNF appears to interpret [Idquo]not prevalent[rldquo] (in terms of signs, trails, etc.) to mean essentially non-existent. If one were to hike the Gallatin Crest or any other area recommended for wilderness in this plan, they would find trails, signs and infrastructure managed to approximately the same level as in any of the areas currently designated as Wilderness on the forest. All of the designated Wilderness areas on the forest (and in Region 1) contain a maintained trail system marked by signs at junctions and other key spots. Furthermore, 2311-Exhibit 01: Physical, Managerial, and Social Characteristics for each ROS setting, in FSM 2300, Chapter 10, includes additional guidance that clearly shows that recommended wilderness areas should be classified as primitive. This is particularly evident when comparing the characteristics for primitive versus semi- primitive non-motorized settings. This is only more confusing when one compares the CGNF to its neighbor forest, the Helena-Lewis and Clark, which determined in its recently published FEIS and forest plan that primitive ROS settings are suitable for mechanized travel. We disagree with that interpretation as well, but surely there should be some consistency in the Region [ndash] one forest cannot claim that Primitive ROS settings are such a high standard that even recommended wilderness does not meet it, while another claims that Primitive ROS settings are applicable for areas that did not meet the recommended wilderness threshold.

These are just some examples to illustrate our larger concern of how the CGNF has failed to properly utilize the ROS in this forest plan revision.

Remedies:

? Revise the winter ROS maps to reflect desired future conditions. In particular:

- o Apply the winter ROS settings in Alternative C to National Forest lands south of Highway 212 within the Cooke City Winter Recreation Emphasis Area

- o Apply the winter ROS settings in Alternative C to National Forest lands on the Line Creek plateau between the Absaroka-Beartooth Wilderness Boundary, Highway 212, and Rock Creek

- o On the west side of the Bridger Mountains, apply a semi-primitive non-motorized winter ROS setting on the west side of the Bridgers from Corbly Gulch, south. On the east side of the Bridger Mountains, increase the amount of semi-primitive non-motorized (winter) setting to more effectively separate motorized and non-motorized winter uses.

? Apply a Primitive ROS setting to all Recommended Wilderness Areas

## II. THE 2020 FOREST PLAN ARBITRARILY RESCINDS RECOMMENDED WILDERNESS PROTECTIONS FOR WILDERNESS-QUALITY LANDSCAPES

As we discussed in section I, both Republic Mountain and the Line Creek Plateau Recommended Wilderness Areas, as included in the 1986 and 1987 forest plans and Alternatives A, B, and C hold special value for backcountry skiers. On pages 3-4 of our scoping comments, pages 7 and 16 of our DEIS comments, and on page 10 of the OAMT DEIS comments, we described why these areas are valuable for backcountry skiers and expressed support for both of these areas continuing to be recommended for wilderness in the revised forest

plan. Therefore, we are very disappointed that the Forest Service has failed to designate these areas as recommended wilderness in the revised forest plan. Furthermore, the Forest Supervisor's rationale for this decision—that they do not add significant value to existing designated wilderness and that there is no threat of development to these places—is faulty.

6 Draft Record of Decision, page 14

In our DEIS comments we discussed our concerns about the growing threat that over-snow vehicle use poses to quiet recreation on both the Line Creek plateau and Republic Mountain. We also identified both Rock Creek headwall (within the Line Creek plateau recommended wilderness area) and Republic Mountain as "important backcountry ski zones" in the assessment comments we submitted (with OAMT) on December 21, 2016. While these areas probably don't face threats from traditional development (roads, logging, etc.), lifting current protections poses a very real threat that the wild character and non-motorized recreation opportunities they afford will be lost. Already, as we described in our DEIS comments, the Erma Mine Road has seen a vast increase in snowmobile use since the 2006 Gallatin Travel Plan (and despite the ROS setting for this area being semi-primitive non-motorized). If Republic Mountain is deemed suitable for over-snow vehicle use it is extremely likely that skilled timbersled riders will access the peak from the Erma Mine road. Access would not be straightforward, but it is possible, and once people learn that they can ride this iconic peak, snowmachine use will ruin the wilderness character that is currently sought and enjoyed by backcountry skiers.

As we described on page 7 our DEIS comments, as well as on page 4 of our scoping comments, spring snowmobile use on the Beartooth Pass has exploded over the past decade. This is causing extreme conflict with human-powered skiers, especially in late spring and early summer. Rock Creek headwall, in the Line Creek Plateau Recommended Wilderness Area, is the only easily-accessible ski run on the Beartooth Pass where skiers do not have to compete with snowmobiles for space on the slopes. For many Beartooth Pass skiers who may not ski in the backcountry otherwise, this is the only non-resort skiing they experience. It is a special place for experienced and novice backcountry skiers alike. Skiing Rock Creek headwall is a surprisingly peaceful and wild experience. Even though the Rock Creek headwall drops you directly to the Beartooth Highway, the highway and associated noise and chaos is not noticeable until you have completed the run and skied back to the pullout at the second switchback. The headwall's steep, challenging terrain is a "bucket list" experience for many skiers, and an annual tradition for many more. If Recommended Wilderness protections are lifted and the area is deemed suitable for OSV use, it is possible, even likely, that it would be designated for OSV in the Custer winter travel plan. In most years, snowmobiles could easily highmark on the headwall starting at the second switchback on the Beartooth Pass. Even in low snow years where snowmobiles may not be able to access the headwall from the highway in the spring, winter highmarking would significantly affect the snow surface and create dangerous conditions for skiers.

In contrast to Supervisor Erickson's statement in the draft Record of Decision, we believe these places do add value to the existing Wilderness areas they adjoin. Republic Mountain is among the most accessible areas in or near the North Absaroka Wilderness for backcountry skiing. While there are many steep and challenging ski lines in the Absaroka-Beartooth Wilderness, they are several miles from the plowed road—a significant distance for a human-powered skier. Republic Mountain offers this same type of terrain close enough to town to enjoy on an afternoon tour. Table 54 in Appendix D recognizes the high value that this place holds for backcountry skiing. While Republic Mountain's most striking feature is "The Fin", many other aspects of the peak are skied as well, from runs dropping into the upper bowl, to chutes below the cliff band that guards the upper slopes of the mountain. Most skiers assume that this peak is within the North Absaroka Wilderness because of the Wilderness experience that it provides, and experiences that people have skiing on Mount Republic help them to appreciate and value Wilderness areas. Likewise, the Line Creek Plateau Recommended Wilderness serves an important role in relationship to the Absaroka-Beartooth Wilderness. The section of the Absaroka-Beartooth Wilderness that this area abuts is quite small and isolated. Expanding the Wilderness area—even by just 800 acres—adds value to the existing Wilderness. In addition, the

steep cliffs within the Line Creek Plateau Recommended Wilderness Area are unique and not well represented within the Absaroka-Beartooth Wilderness. The designated Wilderness on Line Creek Plateau [ndash] and across the Rock Creek drainage in the [ldquo]main[rdquo] Wilderness - is high elevation plateau and alpine forest. This Recommended Wilderness Area, however, drops from 10,000 feet almost all the way to the Rock Creek road and encompasses a broad range of ecotones.

Finally, according to Appendix D, the Forest Service received public comment in support of retaining these two Recommended Wilderness Areas, but no comments in support of dropping the RWA designation for these specific areas. There is value, and public desire, to continue to manage these areas as recommended wilderness and no real reason to do otherwise.

Remedies:

? Designate the Republic Mountain and Line Creek Plateau Recommended Wilderness Areas (as mapped in Alternatives A, B, and C) in the final revised plan.

? Apply a primitive ROS setting to both the Republic Mountain and Line Creek Plateau Recommended Wilderness Areas

? If not recommended for Wilderness in the final revised plan, apply a semi-primitive non-motorized ROS setting to the areas that are currently designated (in the 1986 and 1987 forest plans) as the Republic Mountain and Line Creek Plateau Recommended Wilderness Areas.

### III. THE 2020 FOREST PLAN FAILS TO PREPARE THE FOREST FOR WINTER TRAVEL PLANNING

Throughout this planning process, starting with our scoping comments (pages 5-8) and in our DEIS comments (pages 11-16), as well as in various meetings with Forest Service personnel, we have discussed how the Forest Plan should set the stage for future travel management planning. Therefore, we are very disappointed to see that the 2020 Plan contains minimal direction that will help the Forest Service conduct winter travel planning on these districts, and that it fails to set a timeframe for conducting this planning as well as the site-specific planning necessary to achieve Forest Plan compliance (for example, in regards to areas recommended for wilderness). We appreciate that the 2020 Plan includes a winter ROS (although, as we have already described, this needs improvement), and we appreciate changes that the Forest Service made to certain plan components at our suggestion (such as FW-SUIT-ROSSPM 01). However, the 2020 Plan lacks anything that will incentivize the Forest to conduct winter travel planning where it is needed. This includes on the Beartooth, Ashland, and Sioux Ranger Districts as well as to update the Gallatin Travel Plan in places such as the Bridger Range. As we have described in detail in our earlier comments, the Beartooth, Ashland, and Sioux Ranger Districts are not currently in compliance with Subpart C of the Travel Management Rule. Additionally, there is a significant need to update the Gallatin Travel Plan for some areas on the Bozeman and Gardiner Ranger Districts [ndash] particularly in the Bridger Mountains and south of Highway 212 in Cooke City. Not only does the 2020 Plan not implement our advice, the FEIS provides no insight into why our concerns and suggestions were ignored.

The Flathead National Forest [ndash] Region 1[rsquo]s [ldquo]early adopter[rdquo] of the 2012 Planning Rule [ndash] committed to initiating site-specific planning per the land management plan[rsquo]s suitability direction within 3 years after completing the forest plan revision.<sup>7</sup> At the very least, the CGNF should make a similar commitment. But, considering many areas of the forest lack any type of winter travel management, the CGNF must go beyond the Flathead. It should follow the example recently set by the Inyo National Forest, which

committed to the initiating Subpart C travel planning process within one year of completing its forest plan revision.<sup>8</sup> Given that circumstances on the CGNF do not directly mirror the Flathead or Inyo, we suggest a hybrid approach [ndash] the final plan should commit the CGNF to initiating Subpart C travel management planning on the Beartooth, Ashland, and Sioux Ranger Districts within 3 years and commit to initiating site-specific planning per the forest plan[rsquo]s suitability direction across the forest within 3 years.

<sup>7</sup> Flathead National Forest, Record of Decision for the Land Management Plan, December 2018, page 21

<sup>8</sup> Inyo National Forest, Record of Decision for the Land Management Plan, October 2019, page 17.

Remedies:

? The Final Plan or ROD should state that site-specific winter travel planning is required to designate OSV routes and areas in compliance with Subpart C of the Travel Management Rule on the Custer portion of the National Forest.

? The final ROD should include a commitment to initiate site-specific travel management planning to bring the forest into compliance with the revised Forest Plan within 3 years of completing the Forest Plan Revision.

? The Final Plan should include the following plan components:

o FW-OBJ-REC: Initiate site-specific winter travel planning in compliance with Subpart C of the Travel Management Rule on the Beartooth, Ashland, and Sioux Ranger Districts within 3 years of completion of the revised forest plan.

o FW-OBJ-REC: Initiate site-specific travel planning to update the Gallatin Travel Plan to reflect changes in motorized suitability, and where public comment has demonstrated that updates are needed, within 3 years of completion of the revised forest plan.

? Revise the winter ROS maps in the 2020 Plan to truly reflect Desired Future Conditions and OSV Suitability

#### IV. THE 2020 FOREST PLAN FAILS TO RECOMMEND CERTAIN AREAS FOR WILDERNESS

Recommended Wilderness is an important management tool to preserve Wilderness-quality landscapes for future inclusion into the National Wilderness Preservation System. On pages 16-17 of our DEIS comments and on pages 10-12 of the DEIS comments submitted by OAMT, we asked that a number of Recommended Wilderness Areas be included in the final revised plan. Specifically, we asked that the final plan include the Red Lodge Creek/Hell Roaring, Line Creek Plateau, Republic, Lost Water Canyon, Mystic Cowboy Heaven, Taylor Hilgard, and Gallatin Recommended Wilderness Areas as mapped in Alternative C, along with the Dome Mountain Recommended Wilderness Area mapped in Alternative D, and a Chico-Emigrant Recommended Wilderness Area that we thoroughly described in the OAMT comment letter.

We are glad to see that the 2020 plan includes the Bear Canyon, Lost Water Canyon, Timberline, South Crazy Mountains, and Taylor Hilgard Recommended Wilderness Areas. Additionally, while we are pleased to see the Sawtooth Mountain and Gallatin Crest Recommended Wilderness Areas included in the 2020 plan, the small area separating these two Recommended Wilderness Areas should be recommended as well, creating one large Gallatin Recommended Wilderness Area as proposed by the Gallatin Forest Partnership. However, in addition to

the objection we describe in section II concerning the Forest Service's decision to rescind the Line Creek and Republic Mountain Recommended Wilderness Areas, we object to the Forest Service's failure to recommend the Chico-Emigrant area and Cowboy Heaven for Wilderness protections in the 2020 plan.

The Chico-Emigrant Recommended Wilderness Area that we proposed in our DEIS comments is a modification of Alternative D, consisting of 2 inventoried roadless areas (Chico and Emigrant) as marked on the map for Alternative D and surrounding roadless lands that were not included in the RARE II mapping. Emigrant Peak and Chico Peak offer world-class backcountry skiing opportunities that are only a 30-minute drive from Livingston. The Emigrant Gulch area in particular has grown in popularity in the past decade. We believe that this area presents a valuable addition to the Absaroka-Beartooth Wilderness, as described in our DEIS comments. There is no motorized use within the area we proposed for Wilderness and local mountain bikers are in support of the designation (as evidenced by the proposal's support from OAMT member Southwest Montanan Mountain Bike Association). Unfortunately, we find no response to our proposal in Volume 4, Appendix F of the FEIS (aside from a general discussion of recommended Wilderness forest wide), so we are unclear why the Forest Service chose not to recommend this specific area for Wilderness. Incidentally, this area provides another example of our concerns described in section I of this objection [ndash] the winter ROS setting for Chico Peak and the lands surrounding it is semi-primitive motorized despite the fact that this area is truly not suitable (or physically possible) for motorized equipment to access. This is a good example of how GIS mapping does not always account for vegetation structure, topography, and lack of trail infrastructure and should not be used as the only means of decision-making. Our Chico-Emigrant Recommended Wilderness Proposal needs a more thorough review and analysis in the FEIS.

Finally, the final plan should include a Cowboy Heaven wilderness recommendation, as proposed by the GFP and described in Alternative C. People have recognized and celebrated the Wilderness potential of Cowboy Heaven for decades and there is overwhelming reason to finally give this area the protection it deserves. The Gallatin Forest Partnership provides a strong justification for why Cowboy Heaven should be recommended for wilderness in the final plan, and we support and second their objection.

#### Remedies

? Recommend a Gallatin Wilderness, as proposed by the Gallatin Forest Partnership and included in Alternative C

? Include a Chico-Emigrant Recommended Wilderness Area, as described by OAMT in our June 2019 DEIS comments.

o If the Forest declines to include this Recommended Wilderness Area in the final plan, the winter ROS setting for the area should be semi-primitive non-motorized.

? Recommend Cowboy Heaven for Wilderness, as proposed by the Gallatin Forest Partnership and included in Alternative C.

#### V. THE 2020 FOREST PLAN FAILS TO PROVIDE ADEQUATE PROTECTIONS FOR BACKCOUNTRY AREAS

In our DEIS comments, we supported the OAMT proposal to manage the Lionhead as a non-motorized Backcountry Area. As strong Wilderness advocates, our decision to support a Backcountry Area designation for the Lionhead hinged on the inclusion of strong protections for the area's wild character and the wildlife



habitat it provides. The same holds true for the GFP's proposal for the West Pine and Buffalo Horn Backcountry Areas. While we remain supportive of the Backcountry Area designation for these landscapes, the 2020 Plan is missing the necessary language to ensure these backcountry areas remain wild. For example, while all of the backcountry areas on the forest are important for wildlife, this value is not readily apparent in the 2020 Plan and it is not clear that protecting wildlife habitat is a top priority for these places. There should be desired conditions associated with backcountry areas that specifically speaks to the wildlife values of that area.

Pages 13-15 of the comments submitted by OAMT in response to the DEIS outline exactly what we believe is necessary to ensure that the Lionhead Backcountry Area maintains the same wild character [ndash] and rugged outdoor recreation opportunities [ndash] that the Lionhead Recommended Wilderness Area provides today. This includes prohibiting new trail development with the exception of minor re-routes for sustainability and the possibility of instituting a permit system to ensure the area does not become over-used. The plan should also prohibit timber harvest or production within the Lionhead Backcountry Area. While we appreciate that the 2020 Plan does include specific plan components for the Backcountry Area, these should include additional plan components are suggested by OAMT in our DEIS comments. As written, the 2020 Plan will not provide the protections necessary to ensure the Lionhead remains as it is today into the future.

The GFP provided detailed recommendations for the Buffalo Horn Backcountry Area on pages 14-15 of the GFP Agreement and on pages 3-4 of the Partnership's DEIS comments. We echoed and endorsed these comments in our scoping and DEIS comments. We are concerned that the 2020 Plan arbitrarily drops the Hidden Creek and Goose Creek drainages from the Buffalo Backcountry Area (as opposed to Alternative C), allows for timber harvest in the backcountry area, and fails to provide direction for improving wildlife habitat [ndash] by addressing the proliferation of user trails [ndash] in the backcountry area. All of these deficiencies should be remedied in the final plan.

#### Remedies

? Include the following as a desired condition for Backcountry Areas forest wide:

- o FW-DC-BCA: Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area.

? Add the following additional plan components for the Lionhead Backcountry Area:

- o MG-STD-LHBCA: New trails shall not be constructed in the backcountry area aside from minor re-routes for sustainability.

- o MG-STD-LHBCA: The backcountry area is not suitable for timber production or timber harvest.

- o MG-GDL-LHBCA: If monitoring reveals that opportunities for solitude in the backcountry area are diminished, consider implementing a permitting system to limit use.

? Include the Hidden Creek and Goose Creek drainages in the Buffalo Horn Backcountry Area, as mapped in Alternative C.

? Include the following plan component, from Alternative C, in the Final Plan:

- o MG-SUIT-BHBCA: The backcountry area is not suitable for timber production or timber harvest.

? Include the following plan component for the Buffalo Horn Backcountry Area:

o MG-OBJ-BHBCA: Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area's trail network, including non-system trails, to identify and designate the necessary trail network.

## VI. WE SECOND THE OBJECTIONS PRESENTED BY THE GALLATIN FOREST PARTNERSHIP

Winter Wildlands Alliance is founding member of the Gallatin Forest Partnership (GFP), and shares the concerns and objections presented by the GFP in its objection letter. We endorsed the GFP Agreement on page 2 of our scoping comments and page 2 of our DEIS comments. As a member of the GFP, we helped to both craft the GFP Agreement and write the comment letters submitted on behalf of the Partnership. Likewise, we helped to draft the GFP's objections and we second those objections.

To summarize, the objections submitted by the GFP are:

? The Hyalite Recreation Emphasis Area fails to live up to the vision proposed by the Gallatin Forest Partnership

? The 2020 Plan fails to recommend wilderness for key areas in the Gallatins and Madison Range

? The 2020 Plan fails to fully protect the Buffalo Horn Backcountry Area as envisioned by the GFP Agreement

? The 2020 Plan fails to provide adequate protections for wildlife in the face of growing recreation pressure in the Gallatin Range

? The 2020 Plan includes inconsistent and confusing direction that requires clarification

To remedy these objections, we ask that the Forest Service adopt the following remedies:

? Include the Hyalite Backcountry Area and Hyalite Recreation Emphasis Area as described in Alternative C in the Final Plan.

? Modify MG-OBJ-HREA 01 to read [ldquo]Per decade, one additional shoreline access day use area will be developed or converted from other developed recreation sites, such as campsites on the reservoir lakeshore[rdquo]

? Include the following standard from Alternative C: [ldquo]Construction and designation of new motorized trails shall not be allowed.[rdquo]

? The Final Plan should include the Gallatin Recommended Wilderness Area described in Alternative C

? The Final Plan should include the Cowboy Heaven Recommended Wilderness Area described in Alternative C.

? The Final Plan should classify Recommended Wilderness Areas as Primitive

? Include the Hidden Creek and Goose Creek drainages in the Buffalo Horn Backcountry Area, as mapped in

Alternative C.

? Include the following plan component, from Alternative C, in the Final Plan:

o MG-SUIT-BHBCA: The backcountry area is not suitable for timber production or timber harvest.

? Include the following plan component in the Final Plan:

o MG-OBJ-BHBCA: Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area's trail network, including non-system trails, to identify and designate the necessary trail network.

? Include the following as a desired condition for Backcountry Areas forest wide, or specifically for the West Pine and Buffalo Horn Backcountry Areas: "Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area."

? Include the following objectives in the final plan:

o MG-OBJ-BHBCA: Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area's trail network, including non-system trails, to identify and designate the necessary trail network.

o MG-OBJ-GRREA: Within 3 years, initiate travel analysis for the portion of the Gallatin River Recreation Emphasis Area that is adjacent to the Buffalo Horn Backcountry Area to evaluate the area's trail network, including non-system trails, to identify and designate the necessary trail network.

? Amend FW-GDL-WL 03 to read: "To maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed within key linkage areas unless previously authorized by the Gallatin Travel Plan. New recreation developments may be constructed to address on-going or imminent ecological resource concerns within the key linkage area, including but not limited to, degradation of wildlife habitat connectivity."

? Include the following additional standard in the Final Plan - FW-STD-BCA: Construction or designation of new motorized trails is not allowed.

? Include a map in the FEIS showing the suitable timber base for each Alternative.

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Thank you very much for your consideration of the above objections. We would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections or of any further opportunities to comment or decisions.