

Data Submitted (UTC 11): 9/4/2020 6:00:00 AM

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Re: Custer Gallatin National Forest Plan Revision, Project 50185

Submitted online at <https://cara.ecosystemmanagement.org/Public/CommentInput?Project=50185> on September 4, 2020

September 4, 2020

To the Objections Reviewing Officer and Responsible Official Supervisor Erickson:

Pursuant to 26 CFR [sect]218, please accept these objections on behalf of Montana Wilderness Association (MWA) and our members in response to the final environmental impact statement (FEIS), draft Final Forest Plan (Draft Final Plan), and draft Record of Decision (DROD) for the Custer Gallatin National Forest (CGNF), released July 9, 2020. Pursuant to 36 CFR [sect]219.56(e)(2), the Responsible Officer is CGNF Supervisor Mary Erickson.

We submit these objections in a timely manner and have standing to do so. MWA has taken part in every stage of the CGNF plan revision process, notably submitting formal comments on: the preliminary assessment and need for change in 2015, the proposed action on March 5, 2018, and the draft environmental impact statement and draft plan on June 6, 2019. All of our previous comments have addressed the same landscape-specific issues in each of the geographic areas, as well as Recommended Wilderness Area (RWA), Backcountry Area (BCA), Designated Wilderness Area (DWA), and forest-wide management.

There are many things in the Draft Final Plan that we support, and we see many elements from our earlier comments reflected in the plan. For example, we are pleased to see that the Draft Final Plan includes a recommendation for significant new wilderness in the heart of the Gallatin Range, the Crazies and the Pryor Mountains, and does not allow motorized or mechanized recreation within the recommended wilderness areas. We applaud the Forest in making these adoptions to the Draft Final Plan. These changes are the result of many years of conversations with MWA and our members and we appreciate how receptive the Forest has been to our perspectives.

While the Draft Final Plan does reflect a great deal of MWA's vision for the forest, there are several aspects of the plan where we see significant room for improvement. Therefore, we offer the following objections and resolutions to improve the final plan:

1. Summary of Proposed Plan:

Alternative A reflects the current management and forest plans, established in 1986 and 1987 for the Custer and Gallatin National Forests, respectively, which were administratively combined in 2014. This new forest plan would

be the first plan specifically for the CGNF. Alternative B is the modified proposed action, presented as a balanced approach between ecological, social and economic sustainability. Alternative C has more RWAs and BCAs than Alternative B but with similar objectives. Alternative D emphasizes natural processes, restoration, and undeveloped recreation and reflects the largest amount of RW across the Forest. Alternative E emphasizes a higher level of human presence and represents the alternative with the most motorized and mechanized access across all wildlands in the Forest. Alternative F, the proposed alternative and proposed Final Plan, is a reflection of the previous five alternatives and public comment received on the DEIS:

"This selected alternative uses alternative B from the draft environmental impact statement as a starting point, with modifications in response to Custer Gallatin National Forest Draft Record of Decision public comments and features of other alternatives. It addresses the need for change identified during the assessment and meets the requirements of the 2012 Planning Rule. This draft decision is also responsive to local government, Tribal, and public engagement[hellip]"

DROD, 7.

"Alternative F, the selected alternative, represents a mix of recommended wilderness areas, backcountry areas, recreation emphasis areas, and lands identified as suitable for timber production. Plan objectives reflect a mix of resource enhancement[hellip]"

DROD, 33.

Alternative F is also identified as the environmentally preferable alternative in compliance with the National Environmental Policy Act (NEPA), 42 U.S.C. 4321.

2. Summary of Objections:

We raise the following objections to the Draft Final Plan, Alternative F:

Crazy Mountains Geographic Area:

? 01: The Crazy Mountains Backcountry Area (CMBCA) does not provide adequate protection. The final plan must:

? Prohibit mechanized use in the CMBCA.

? Expand the CMBCA to include areas likely to be consolidated.

? 02: We second the Objections presented by the Crow Tribe. The final plan must:

? Include a standard addressing when consultation is needed.

? Modify the desired conditions of the Crazy Mountains Area of Tribal Interest.

Madison and Gallatin Mountains Geographic Area:

? 03: We second the Objections presented by the Gallatin Forest Partnership.

? 04: We object to the elimination of the 20,774-acre Lionhead RWA.

Absaroka-Beartooth Geographic Area:

? 05: We object to the failure of the draft plan to carry forward the following RW areas from the 1986 Custer Forest Plan:

? Republic Mountain, Burnt Mountain, and Line Creek Plateau.

Pryor Mountains Geographic Area:

? 06: We object to the BCA management of the Big Pryor and Punch Bowl areas:

? Big Pryor and Punch Bowl should each be managed as RW.

? Alternatively: We object to elements of the BCA of the Big Pryor and Punch Bowl areas:

? Big Pryor and Punch Bowl BCAs should be non-mechanized and non-motorized.

? Temporary roads should not be allowed.

? The BCAs should contain a standard to prohibit new mechanized trail building or designation.

Sioux Ranger District Geographic Area:

? We object to elements of the BCA management of Chalk Buttes:

? 07: The BCA should contain a standard that specifically restricts mechanized use to existing motorized routes.

? 08: Temporary roads should not be allowed.

? 09: The BCA should contain a standard to prohibit mechanized trail building or designation.

Designated Wilderness Management:

? 10: We object to the failure of the plan to include an objective to complete Wilderness Management Plans for the designated Wilderness areas on the Forest.

? 11: We object to the failure to include specific plan components in the draft plan that will adequately protect designated Wilderness areas.

Forest-wide Management

? 12: We object to the Draft ROD's vague commitment to "initiate site-specific planning per the plan's suitability direction as soon as practicable from the date of this decision."

? 13: The forest-wide backcountry area direction should include a standard to limit motorized trail construction and designation.

? 14: The draft Final Plan does not fully address how the forest will sustainably manage recreation in BCAs to reduce impacts to wildlife even as recreation use increases, nor are there monitoring questions to assist the forest in tracking its success on this front.

3. GEOGRAPHIC AREA OBJECTIONS

a. Crazy Mountains Geographic Area:

Objection 01: The Crazy Mountains Backcountry Area does not provide adequate protection.

The DROD acknowledges that "The Crow Tribe and the public expressed considerable interest in higher levels of protection of lands in the Crazy Mountains, a highly valued landscape" and that the Backcountry Area is intended to "retain the existing semi-primitive non-motorized character on the east side of the range". Between the Forest-wide and Geographic Area plan components for the Crazy Mountains Backcountry Area (CMBCA), there are protective management guidelines embedded in this plan allocation to retain the existing condition of the area. However, there is one notable exception. Mountain biking does not belong in the CMBCA, which is currently managed for foot and stock use only.

MWA emphasized the importance of keeping this part of the range non-mechanized on page 51 of our comments on the DEIS and draft forest plan: "Expanding mountain bike use into this area would have a significant impact on the wild character of the Crazies. Mountain bikes allow people to go farther into backcountry areas more quickly, thereby increasing the human presence in wild places. For an island range as small as the Crazies, this would have a significant and detrimental impact on the remaining opportunities for solitude and primitive recreation in the Crazies, and also on wildlife."

There are no existing mountain bike trails in this area, so closing the CMBCA to mechanized use would not affect any existing recreational access. Mountain bike trails outside the CMBCA, on the west side of the range, would be unaffected. Making the CMBCA suitable for mountain bike use opens the door for mountain bike trails to be designated or constructed in this area in the future, just inviting conflict where there doesn't need to be any.

There are examples of other non-mechanized backcountry areas in The Draft Final Plan, notably Bad Canyon, and no clear rationale or discussion behind the decision to make the CMBCA suitable for mountain biking in either the FEIS or draft Final Plan. As the DROD notes, the Crow Tribe and the public have been very vocal about the desire to see the Crazies protected, and it is therefore important to retain the existing conditions at the very least and implement management that restores degraded areas. The Crazies are already suffering from significant recreational impact. Increasing recreational uses is not appropriate for the goal of retaining the existing character of the range. The area should continue to be open to foot and stock use only.

In addition, the CMBCA should be expanded to include areas likely to be consolidated. Consolidation of the land ownership checkerboard is identified as a priority in the DROD, so it is important that the Draft Final Plan implement meaningful management steps to achieve that goal. The CMBCA proposed in Alternative C is nearly three times as large as the Backcountry Area proposed in the Draft Final Plan. It appears that the western boundary of the final CMBCA was designed in order to accommodate the existing motorized and mechanized access. Even if it is a prerogative of the planning team to minimize impacts to the existing travel plan, there is still room to enlarge the CMBCA eastward without affecting recreational access.

The proposed East Crazy Mountain Access Project, developed by the Crazy Mountains Working Group, would consolidate a large section to the east of the CMBCA. If that exchange project is successful, that consolidated block of land should be included in the CMBCA. By expanding the CMBCA to include sections 4 along Blackaby Creek, 22 along Dry Creek, 26 along Otter Creek, and 34 along North Amelong Creek, any sections of land traded into Forest Service ownership through the exchange project would be directly adjacent to CMBCA land and likely managed accordingly. By including more of the eastern half of the range in the CMBCA, it would help to retain the existing wild character of the area as advocated for by MWA, the Crow Tribe and the public.

Remedy:

? Modify the suitability language in the CMBCA to prohibit mechanized use, similar to the language proposed for the Bad Canyon Backcountry Area: (BC-SUIT-CMBCA): The backcountry area is not suitable for motorized transport. The backcountry area is not suitable for mechanized transport, except use of game carts.

? Expand the CMBCA to include sections 4, 22, 26, and 34.

Objection 02: We second the objections presented by the Crow Tribal Historic Preservation Office.

MWA shares the concerns and objections presented by the Crow Tribe regarding the Area of Tribal Interest. We discussed the importance of protecting opportunities for traditional cultural practices and the need for close consultation with the Crow Tribe in our comments on the Draft EIS and draft plan. We object to the lack of clarity in the Crazy Mountains Area of Tribal Interest, as highlighted by the Crow Tribe.

Remedies: To summarize, the remedies to this objection are:

? Consultation requirements should be included as a Standard.

? Desired conditions (BC-DC-TRIBAL) should be modified to address the specific characteristics that make the Crazy Mountains a significant cultural landscape.

b. Madison, Henry's Lake, and Gallatin Mountains Geographic Area:

Objection 03: We second the objections presented by the Gallatin Forest Partnership.

Montana Wilderness Association is a 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 5 of our scoping comments and page 54 of our DEIS comments. As a member of the GFP, we helped to both craft the GFP Agreement and write the comment letters and objections submitted on behalf of the Partnership. While we are excited to see that many elements of the agreement are reflected in Alternative F, there are some important protections missing that we would like to see added.

Cowboy Heaven

Cowboy Heaven is an area that has been important to MWA and its members since the organization's founding because its a rich low to mid-elevation habitat "bridge" uniquely reaching from the semi-arid zones of the Bear Trap to the fragile rock and ice alpine environments of the Spanish Peaks. The lower elevation lands in Cowboy Heaven are not very well represented in the national Wilderness preservation system and the ecological conditions make the area important wildlife habitat. The FEIS specifically notes Cowboy Heaven has particularly high value for wildlife connectivity . Modeling studies show that Cowboy Heaven is a key corridor for grizzlies and it is also important big game habitat. Cowboy Heaven shares approximately 20 miles of common boundaries with the Lee Metcalf Wilderness, of which 12.5 miles are located on the Custer Gallatin side. The area has been proposed for inclusion in the Lee Metcalf Wilderness in all five Montana wilderness bills passed by the U.S. Senate and House since 1986.

The Beaverhead-Deerlodge Forest Plan also recommends Cowboy Heaven for inclusion in the Lee Metcalf Wilderness due to both High Wilderness Suitability Ratings, (Natural Integrity, Solitude, Opportunities for Primitive Recreation and Manageability and low conflicts. The Beaverhead analysis notes that inclusion of Cowboy Heaven would add ecological diversity to the Metcalf Wilderness, safeguard wildlife corridors and "make the entire (wilderness) area more manageable" by connecting the Beartrap to the Spanish Peaks Units of the Lee Metcalf Wilderness. The Custer Gallatin also acknowledges that recommending Cowboy Heaven for wilderness would make for a more logical and manageable wilderness boundary than now exists .

One of the major accomplishments of the GFP was in uniting stakeholders around a common vision for Cowboy Heaven as recommended wilderness, an area that has high wildlife and connectivity value and is adjacent to designated Wilderness and recommended wilderness. The reasons cited in the DROD for denying Cowboy Heaven a wilderness recommendations are flawed, as we describe in more detail in the Gallatin Forest Partnership objections. A backcountry area is not adequate protection for this unique area because it would promote inconsistent management within essentially the same landscape as that recommended for

wilderness by the Beaverhead, and the designated Lee Metcalf. The area is a keystone to the larger wilderness landscape and deserves to be recommended wilderness.

Hyalite

We were also disappointed to see the GFP's recommendations for Hyalite only minimally included. The high, remote alpine peaks and basins of Hyalite provide highly valued backcountry recreation experiences, and opportunities for solitude in an area so close to town. The proposed REA would not provide protection that ensures they remain wild. In addition, South Cottonwood is not recommended for any protection at all and would apparently be regularly scheduled for timber harvest as part of the suitable timber base.

While the current Forest Service staff may have no intentions of drastically changing the character of the Hyalite backcountry, the direction in the Draft Final Plan leaves the door open for future managers to expand motorized trails into quiet basins, develop recreation infrastructure, and build roads and conduct logging projects in some of the most valued wildlife habitat and most prized backcountry areas close to town. The strong protections that have been proposed by the Gallatin Forest Partnership agreement can ensure that the community vision for this area can persist into the future. Therefore, we second the objections presented by the Gallatin Forest Partnership.

Gallatin Wilderness

The contiguous recommended wilderness areas proposed by the GFP would have protected the public lands along the boundary of Yellowstone north to Hyalite Lake. We object to the omission of the Sheep Mountain area, dividing the Gallatin wilderness recommendation into two separate parcels. As discussed in the GFP's objection, connecting the Sawtooth and Gallatin Crest RWAs into a single Gallatin RWA would create a more cohesive and manageable area with significant conservation benefits.

We also object to placing the boundary of the Gallatin Crest RWA on the Hyalite Peak ridge, rather than

extending this boundary to Hyalite Lake as proposed in the GFP Agreement. Including all of Hyalite Peak in the RWA would protect this remote alpine basin from the potential of motorized expansion in the future. It would also help limit trespass to the Gallatin Crest by providing a more manageable buffer between the motorized trail #427 and the Gallatin Crest Trail. Furthermore, no resource or recreation management conflicts would result from extending the RWA boundary to Hyalite Lake.

MWA seconds the objections presented by the GFP. To summarize, these objections 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

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 "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"

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

? 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:

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

? Include the following plan component in the Final Plan:

? 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:

? 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.

? 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.

Lionhead

Objection 04: MWA objects to the removal of Lionhead from Recommended Wilderness protections and the unsupported recodification of the Continental Divide National Scenic Trail (CDNST) on the CGNF as suitable for mechanized uses without requisite analysis.

Both actions are contrary to the nature and purposes of the CDNST.

As stated in the final Forest Plan summary, Lionhead RWA has been managed under the 1987 Gallatin plan as a recommended wilderness area for more than 30 years. MWA seeks a solution which fully retains the Lionhead RWA boundary (Alt A) and manages the CDNST corridor for its primary nature and purposes. No previous decision establishes RWA trails in the Lionhead RWA as suitable for mountain biking. Such a decision would have violated the forest plan and the CDNST Comprehensive Plan. It is inappropriate for the 2020 Land Management Plan to remove the recommended wilderness protection based on use that has never been legally established.

The draft Final Plan documents repeatedly state that mountain biking is suitable on 18 miles of Lionhead trails in the current plan. Mountain biking has never been and may not be lawfully established as suitable on trails within the Lionhead RWA. In the 2006 Gallatin NF Travel Plan ROD, then Supervisor Rebecca Heath decided to prohibit snowmobiles in the Lionhead because wilderness was the highest and best use of the land and

"managing for such uses runs contrary to Forest Service Region 1 guidance to manage for uses consistent with wilderness values." She went on to address mountain biking:

Using the same logic for the recommended wilderness area that I had for snowmobiling, I also believe that mountain bikes should be prohibited on area trails. However, we made a mistake in the alternatives we presented for public comment in that none of them would have precluded mountain bikes. While we corrected this oversight by modifying Alternative 6 in the FEIS, I still don't believe that it would be appropriate to make a decision to prohibit mountain bikes without first providing a public comment opportunity. Instead, it is my intent to propose a modification to the Travel Plan to preclude this use in the Lionhead recommended wilderness area, allow for public comment, and then make a decision within the next year or so.

On June 9, 2008, Supervisor Mary Erickson invited additional public comment stating her belief that "[hellip]mountain bikes should be prohibited on trails within the Lionhead recommended wilderness area." Supervisor Erickson's letter also explains that USFS recommended wilderness "extends onto the Targhee National Forest."

No decision was ever issued.

In fact, the Gallatin NF planned to ban mountain bikes because the forest recognized that mechanized travel would undermine wilderness character and impair potential for designation of the recommended wilderness established through a six-year public process.

The draft decision eliminates wilderness to foster mechanized travel never approved in any previous plan which two Gallatin Forest Supervisors believed "should be prohibited" in the RWA to protect future designation.

The elimination of wilderness protections here transforms the entire CDNST on the CGNF as well as the intertwined Caribou-Targhee recommended wilderness into a mountain bike trail.

The Continental Divide National Scenic Trail is not a mountain bike trail. Its dual purposes are to provide high quality "primitive" (non-mechanized) recreation and to conserve natural, historic and cultural resources of the Trail corridor

The nature and purposes of the Continental Divide National Scenic Trail are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the Continental Divide National Scenic Trail corridor.

Eliminating recommended wilderness within the CDNST's protected corridor to promote mountain bike use is contrary to conservation and recreation purposes of the CDNST.

Protecting natural, historic and cultural resources within a broad wild land corridor are the conservation purposes of the CDNST. These conservation purposes are met within wilderness. Outside designated wilderness, each forest must "[hellip]establish a management area for the CDNST that is broad enough to protect natural, scenic, historic, and cultural features."

Between Targhee and Raynald's Passes the special features, nature and purposes of the CDNST are protected by recommended wilderness wrapping the Continental Divide on two national forests. The Continental Divide Trail Comprehensive Plan, based on the National Trails Act, provides clear direction that recommended wilderness that protects the wild corridor cannot be removed or reduced:

Where the CDNST crosses an area recommended for designation as a wilderness[hellip]

the CDNST must be managed so as to leave the area unimpaired for inclusion in the National Wilderness Preservation System.

The final revised forest plan must be made consistent with national direction for the CDNST. Mechanized travel is not a primary purpose of the CDNST. Mountain biking is not listed as a "compatible" recreational use of the CDNST. Nor, as the decision mistakenly alleges, is mechanized travel classed as "suitable" on the CDNST.

National direction for the CDNST states that mechanized travel is "conditionally" suitable. Bike traffic may be allowed where such use does not interfere with the nature and purposes of the CDNST.

Removing wilderness protections to foster mechanized traffic is clear evidence of substantial interference.

Elevating bikes from conditional to "suitable" is not allowed where the CDNST is located within RWAs. Outside RWAs reclassifying mechanized travel as suitable requires a prior analysis of potential effects on the nature and purpose of the CDNST, including the intertwined Caribou-Targhee RWA. That analysis is missing.

On the Custer Gallatin, the CDNST traverses a wild area well used by grizzlies, lynx and wolverine, anchoring an essential movement corridor linking Yellowstone to the High Divide wildland ecosystems. The FEIS notes that the Lionhead has particularly high connectivity values. The DROD states that a backcountry area in Lionhead will

"protect the current character of the area and will allow existing uses to continue as long as they do not degrade the character of the area". However, there is nothing in the draft plan that guides future managers on how to assess the changing character of the area or how to address recreational uses that may be negatively affecting it. Furthermore, the proposed decision fails to evaluate how removing wilderness protections to convert the area into a biking zone may affect levels of mechanized traffic, increasing disturbance that may alter wildlife use over time. Mechanized technology and marketing continue to change in ways that accelerate speed, steepness and distance covered. Converting recommended wilderness into bike zones (year-round) may increase disturbances and the likelihood of encounters in what would otherwise be the best and most protected core wilderness habitats. These changes may affect wildlife.

Lacking analysis, the proposed decision leaves key questions unanswered: How are levels of mechanized traffic likely to change over time? How will increasing levels of mechanized uses affect the opportunities for "high-quality foot and horseback riding", the primary purposes of the CDNST? How will recreational uses affect grizzly bears and other wildlife in this key movement corridor just a stone's throw from Yellowstone National Park? What about changing mechanized technology and marketing? Will the forest actually enforce the motorized restriction on e-bikes or, as experience shows, will motorized bikes become established and later legalized? How does transforming the CDNST into a biking destination affect the wilderness character of the adjoining Targhee Creek RWA through which the CDNST also passes?

In the draft summary, Supervisor Erickson explains that recommended wilderness or backcountry area allocations were needed for forest areas which needed "additional protective measures." But for Lionhead, the Draft Final Plan reduces protective measures, eliminating three decades of wilderness protection in favor of mechanized travel and weakened wild land protections.

Keeping Lionhead as Recommended Wilderness provides 12 wild land protections not provided as a BCA, allowing recreation developments, races, unlimited mechanized traffic, drone launchings, timber harvest and hardrock mining. Five wilderness protections will be omitted or removed from Lionhead RWA under the proposed plan, with collateral degradation and effects impairing recommended wilderness on the Caribou-Targhee National Forest.

The Lionhead wilderness is too important for wildlife, the CDNST and primitive recreation opportunities to turn into a mountain biking destination. The FEIS acknowledges the Lionhead as particularly high value for wildlife connectivity. In the DROD, Supervisor Erickson acknowledges that "the wilderness characteristics of the place have been retained through the years." If this area continues to embody the high wilderness values that led to the area's recommendation in 1987, then that protection should not be rescinded now to accommodate a use that has never been adequately analyzed and found suitable.

Remedies:

? Lionhead Recommended Wilderness (27,266 acres) is retained without loss and wilderness protections applied without further delay.

? The Continental Divide National Scenic Trail and its wild land corridor are protected and managed as directed by the National Trails Act, 2009 CDNST Comprehensive Plan and 2016 CDNST corridor management in forest plan revision. To accomplish these three changes are necessary in Continental Divide National Scenic Trail plan components:

? Desired Condition (MG-DC-CDNST) 08 is added as follows: The CDNST and its corridor are protected in the Lionhead Recommended Wilderness which retains historic wilderness character, provides outstanding opportunities for primitive foot and horseback recreation and remains unimpaired for future inclusion in the National Wilderness Preservation System.

? (MG-SUIT-CDNST) 03 revised: The Continental Divide National Scenic Trail is not suitable for winter motorized over-snow vehicle in recommended wilderness.

? (MG-SUIT-CDNST) 04 revised: The Continental Divide National Scenic Trail is not suitable for mountain biking within recommended wilderness. Outside RWA, mountain biking is conditionally suitable and may be allowed following analysis of effects on the nature and purpose of the trail.

c. Absaroka-Beartooth Geographic Area:

Objection 05: We object to the DROD's decision to discontinue the wilderness recommendations of four areas that were recommended in the 1986 Custer forest plan and in both Alternatives B and C in the DEIS.

The rationale provided in the DROD for dropping the Republic Mountain, Line Creek, and Burnt Mountain RWAs - that "there is no value to a recommended wilderness allocation" of these areas - is contradicted by the agency's own wilderness evaluation.

For example, Line Creek RWA would significantly augment the ecological values of the designated wilderness. According to the agency's wilderness evaluation, the Line Creek RWA is part of the Line Creek Plateau Research Natural Area, which covers the easternmost, warmest alpine plateau in the Beartooth Mountains and "consists of extensive areas of alpine tundra vegetation, a cirque basin with alpine lakes and ponds, as well as, many unique plant species .

Similarly, the Republic RWA would add primitive recreational value to the designated wilderness. According to the wilderness evaluation: "This area offers unconfined and primitive recreation opportunities especially noted for backcountry skiing 'The Fin' on the side of Republic Peak." Thus, the area provides "high level of opportunity for primitive and/or unconfined recreation for rugged cross-country travel and expert level backcountry skiing."

Remedy: Recommend the Republic Mountain, Burnt Mountain, and Line Creek Plateau areas for Wilderness (as

mapped in Alternatives A, B, and C) in the final revised plan.

a. Pryor Mountains Geographic Area:

MWA is overjoyed to see the nearly doubling of RWA in the Pryors with the retention and expansion of the Lost Water Canyon RWA and recommended wilderness management for the Bear Canyon Area. These are great gains for the Forest, for potential inclusion in the National Wilderness Preservation System, and for the public. These gains, however, do not overshadow our disappointment at the proposed BCA management for Big Pryor and Punch Bowl.

Objection 06: We object to BCA Management of the Big Pryor and Punch Bowl Areas.

The DROD explains: "I have selected a BCA allocation for Big Pryor (12,610 acres) and Punch Bowl (6,097 acres) so that existing motorized and mechanized transport can continue but not expand, and to retain flexibility for future vegetation management." The DROD, however, fails to adequately explain why Big Pryor and Punch Bowl specifically are better suited with BCA management in comparison to the Lost Water Canyon and Bear Canyon RWAs and other proposed BCAs on the Forest.

The rationale for this decision is not explicitly laid out in the DROD, but we can glean insights from the Wilderness Analysis, Appendix D of the FEIS. For the Big Pryor and Punch Bowl areas, it appears that the failure to allocate RW management rests largely on the Analysis's findings of grazing and a "lack of natural fire" that have departed both the areas from historical vegetation conditions. Likewise, both analyses point to various range developments like fencing and water developments as detrimental to RW allocation. Analyses for both areas note their exceptional opportunities for primitive and unconfined recreation, though noting that both areas have some existing motorized/mechanized routes that may impact a wilderness experience close to those routes.

First, the arguments that a lack of natural fire, departure from historic vegetative conditions, and range developments diminish wilderness characteristics is contradictory within the wilderness evaluation. The same concerns are noted in the analyses of both Bear Canyon and Lost Water Canyon: both areas also have departures from historic vegetative conditions, a lack of natural fire, and some range developments, but those elements did not prevent RW allocations for Bear Canyon and Lost Water Canyon. There is no discussion as to why those elements are detrimental to Big Pryor and Punch Bowl's potential for RW management but not Bear Canyon and Lost Water Canyon's RW management. Comparing Punch Bowl and Lost Water Canyon specifically, the analysis for each area notes concerns about a motorized route in each area that bisects sections of the larger area. But again, Punch Bowl area does not receive RW allocation whereas Lost Water Canyon does, despite similar physical conditions and without adequate explanations as to why different management is needed. Where the facts are the same, but the administrative decision is different without explanation, the decision is arbitrary and capricious.

Second, the DROD cites a need for flexibility to manage vegetative conditions in Big Pryor and Punch Bowl as a reason for BCA allocation in these two areas, but that justification is not supported by the plan components. As discussed above, the vegetative conditions of all four areas in the Pryors are largely similar in the Wilderness Analysis. The analysis nor the DROD discuss specifically what vegetative conditions in Big Pryor and Punch Bowl need to be managed in a particular way, and specifically how BCA management achieves those goals. BCA management parameters do not contain any mention of vegetative treatments, goals, or standards that are specific to Big Pryor and Punch Bowl, nor do the terrestrial vegetation plan components connect to BCA management and the stated need for "flexibility." There is no supporting evidence in the FEIS for the statement in the DROD regarding a particular need for flexibility that only BCA management can provide. There is nothing in the proposed management components for vegetation in the Pryors that is specific to BCA or RW management. Because the vegetative conditions and concerns are shared across the four main regions of the Pryors, one can reasonably conclude that the vegetative plan components are achievable in RW areas, making any argument that flexibility is needed for unspecified specific management in BCAs unsupported.

Similarly, the concerns about vegetation management and allowed recreation in the BCAs are misaligned. Unfortunately, the Pryors at large do have an invasive weed problem, largely a result of extensive grazing and motorized recreation that are known to contribute to soil disruption and seed distribution. In fact, the draft Final Plan unequivocally states that invasive plants are "currently more prevalent along Forest Service system roads and motorized trails[hellip]" However there is nothing in the FEIS or DROD that addresses this problem specifically in relation to BCA management of Big Pryor and Punch Bowl, two locations noted in the Wilderness Analysis as having conditions that depart from historic vegetative conditions, including invasive non-native weeds. RW allocation, with management that does not include mechanized and particularly motorized recreation, would logically reduce the spread of invasive weeds, both by preventing the actual activity from taking place and by preventing motorized access to a few problematic routes.

Third, the stated desire to maintain flexibility for vegetative management as a reason to allow temporary roads falls flat. As previously discussed, motorized recreation is a big reason why the Pryors have the invasive weed problem that they do. Adding to that footprint, even temporarily, will only exacerbate the problem. Needing roads to treat the problems that roads have already caused is logically incongruous. There are plenty of existing, permanent roads in the Pryors already that allow more than sufficient access for any necessary maintenance activities.

Because the forest-wide management calls for RWAs to contain no non-conforming uses, closing the few miles of roads that intrude into the Big Pryor and Punch Bowl areas will be necessary. These roads are not major access ways, do not provide meaningful access or viable recreation (ie, they are relatively short roads that dead-end not at any notable feature that would be a recreational draw, they just dissipate from lack of use because they don't go anywhere), and hinder the retention and enhancement of the wilderness characteristics present in these two remarkable landscapes. The gains of managing Big Pryor and Punch Bowl as recommended wilderness far exceed the slight loss of low-quality motorized routes with such a closure.

Finally, in regard to grazing, the DROD, grazing infrastructure and management was also part of the reasoning for not recommending Big Pryor and Punch Bowl for wilderness. The presence of grazing allotments and infrastructure should not factor into the decision about whether to recommend an area for wilderness. The Wilderness Act does not preclude grazing or grazing infrastructure, and Congress has made this abundantly clear. The Congressional Grazing Guidelines state:

There shall be no curtailment of grazing permits or privileges in an area simply because it is designated as wilderness. As stated in the Forest Service regulations (36 CFR 293.7), grazing in wilderness areas ordinarily will be controlled under the general regulations governing grazing of livestock on National Forests. This includes the establishment of normal range allotments and allotment management plans. Furthermore, wilderness designation should not prevent the maintenance of existing fences or other livestock management improvements, nor the construction and maintenance of new fences or improvements which are consistent with allotment management plans and/or which are necessary for the protection of the range.

Recommended Wilderness should not be held to a higher standard than designated Wilderness and the guidelines set by Congress for managing Wilderness. Therefore, the presence of allotments and range infrastructure is not a valid reason for denying Big Pryor and Punch Bowl a Wilderness recommendation.

In terms of recreation in these areas, the DROD specifically states that BCA management is intended to allow "existing motorized and mechanized transport can continue but not expand." The current plan component that allows for temporary road building negates this intent. Temporary roads are a gateway to increased motorized and mechanized use: once roads and ways appear on the landscape, no matter the agency's intention for those roads to be temporary, users will use the roads. Once use is established, it will be incredibly difficult - if not impossible - for the Forest Service to meaningfully enforce any limitations and ultimately hinder the Forest's ability to manage the area for the characteristics for which it is allocated (see the Lionhead area as an example). Adding to the route footprint in these BCAs will expand and increase the motorized and mechanized transport in the BCAs, a direct contradiction to the stated goal in the DROD to maintain the current level of access and use.

Remedy: MWA proposes Big Pryor and Punch Bowl be managed as Recommended Wilderness with the same prescriptions as Bear Canyon, Lost Water Canyon and other RW areas across the Forest.

Should the Forest Service fail to adopt RW management for Big Pryor and Punch Bowl in the final plan, we offer the following alternative objections and remedies to the BCA plan components:

Alternative Objection 01: We object to the stated Desired Condition for the Big Pryor and Punch Bowl BCAs:

? PR-DC-PBCA-01: The backcountry areas provide for less developed, semi-primitive recreation opportunities, both motorized and non-motorized in both summer and winter.

Both of these areas have outstanding and unique ecological, geologic, cultural, and primitive recreational resources that are best protected with non-motorized and non-mechanized recreation. While there are a few miles of limited motorized routes in each of these areas, these routes are not major ways, do not provide meaningful access, and intrude into otherwise intact landscapes. There is precedent in this draft Forest Plan for closing mechanized and motorized routes to create a non-motorized, non-mechanized BCA. Bad Canyon BCA in the Absaroka Beartooth Geographic Area proposes to close 14 miles of mountain bike trails to protect the backcountry character of the Canyon. It is therefore both reasonable that motorized and mechanized use in

sensitive areas is deleterious to the backcountry character of the areas and reasonable for the Forest Service to close a proposed BCA to such uses to protect the very character it is managing the area for.

Closing the very few miles of intruding, non-essential ways that intrude into the Big Pryor and Bunch Bowl BCAs will likewise protect and enhance the backcountry character of these two areas. Access to the areas will still be available by major system road open to motorized and mechanized recreation that largely create the boundaries of these BCAs: there is no reason to have motorized and mechanized recreation within the bounds of the BCA because so much ample, good quality access already exists via those system ways. Roads and routes that flank but are not included in the BCA can be traversed by mechanized and motorized means, as these are major system routes and important access conduits to these areas. But mechanized and motorized use does not need to leave the existing routes, and thus such uses are not essential to the proposed BCAs and allowing recreation that is noted as being detrimental to backcountry character (see the Bad Canyon BCA) therefore thwarts the Forest's goals.

Remedy: The Big Pryor and Punch Bowl BCAs should be managed as non-motorized and non-mechanized BCAs with the following Desired Condition:

? PR-DC-PBCA-01 be revised to state: The backcountry areas provide for less developed, semi-primitive recreation opportunities, with no mechanized or motorized uses within the exterior bounds of the BCA.

Alternative Objection 02: We object to the following clause in PR-ST-BCA-01: :

? PR-ST-PBCA-01: [hellip] temporary roads may be allowed.

To conform with Alternative Objection and Remedy 1, a non-motorized and non-mechanized BCA allocation for Big Pryor and Punch Bowl must contain conforming standard language.

To fulfil the stated goal of allowing "existing motorized and mechanized transport can continue but not expand," the Forest must include an express prohibition on the building or designating of new mechanized trails in addition to strengthening the standard for temporary road building.

Remedy: PR-ST-PBCA-01 be revised to state:

? PR-ST-PBCA-01: New permanent or temporary roads shall not be allowed.

The following standard should also be adopted:

? PR-ST-PBCA-03: PR-STD-PBCA-03: New mechanized trails shall not be constructed or designated.

Alternative Objection 03: We object to the suitability statement:

? PR-SUIT-PBCA-01: The backcountry areas are suitable for motorized transport on existing system motorized routes and areas. The backcountry areas are suitable for mechanized transport. Mountain biking is suitable only on approved system mountain biking routes.

Like the revision of the standards to conform with a new Desired Condition for non-motorized, non-mechanized BCA allocation in the Big Pryor and Punch Bowl BCAs, the suitability statement must also be revised.

Remedy: PR-SUIT-PBCA-01 be revised to state:

? PR-SUIT-PBCA-01: The backcountry area is not suitable for motorized transport. The backcountry areas are not suitable for mechanized transport.

Alternative Objection 04: We object to the stated standards for the Big Pryor and Punch Bowl BCAs.

In the event that the Forest Service denies our first protest to manage these areas as RW and also rejects our first alternative protest to manage these areas as non-motorized and non-mechanized BCAs, the Big Pryor and Punch Bowl BCAs should contain a standard that expressly prohibits the building or designation of new mechanized trails and temporary roads.

To fulfil the stated goal of allowing "existing motorized and mechanized transport can continue but not expand," the Forest must include an express prohibition on the building or designating of new mechanized trails in addition to strengthening the standard for temporary road building.

Remedy: In the event that the Forest retains the BCA allocation allowing mechanized and motorized uses, the following plan components PR-STD-PBCA-01 should be revised to say:

? PR-STD-PBCA-01: New permanent or temporary roads shall not be allowed.

A new standard should be adopted as follows:

? PR-STD-PBCA-03: New mechanized trails shall not be constructed or designated.

b. Sioux Ranger District Geographic Area:

We support the BCA allocation for the Chalk Buttes BCA in the Sioux Ranger District. The Chalk Buttes are a unique gem of public land in southeast Montana that our members have found solace in for many, many years. The unique, rugged vertical landscape in the vast prairie deserves this special allocation and management. However, we believe the BCA plan components should be strengthened to ensure the Forest Service's intentions for the special area are fulfilled and protected in the future.

Objection 07: We object to the Desired Condition:

? SX-DC-CBBCA-01: The area provides for less developed, semi-primitive recreation opportunities, both motorized and non-motorized in both summer and winter.

The Chalk Buttes are currently accessible by the public mainly via one public road that bisects the unit. Because public access to the Buttes is limited due to surrounding private land, maintaining and stewarding this access should be a priority. However, this desired condition as it is currently worded, is misleading. It implies that the Buttes themselves - a rugged, challenging landscape that is entirely unsuitable for and inaccessible to wheeled transportation of any kind - are accessible and suitable for public motorized and mechanized recreation when such opportunities do not exist nor would be appropriate. This can be easily removed with a slight adjustment to the statement.

Remedy: We suggest the clause "both motorized and non-motorized in both summer and winter" be removed and the Desired Condition simply state:

? SX-DC-CBBCA-01: The area provides for less developed, semi-primitive recreation opportunities.

Objection 08: We object to the standard:

? SX-STD-CBBCA-01: [hellip] temporary roads may be allowed.

As discussed in the above objections regarding this same standard in the Big Pryor and Punch Bowl BCAs, allowing temporary roads is a gateway to increasing and expanding the very uses the Forest Service seeks to limit with its BCA plan components for the Chalk Buttes. While not explicit in the draft ROD the way such sentiment is clear for the Pryors, communications with Forest Service officials have confirmed that the Forest Service does not intend to promote expanded use beyond the existing major access road: the Forest Service intends to freeze the existing motorized and mechanized access and footprint in the Buttes, but this standard and

the failure to include a standard clearly preventing the future construction of new mechanized trails leaves that door open for the next 20-30 years this plan will be in effect. To fully realize and protect the Forest Service's vision for the Buttes, as well as the inherent values of the Buttes themselves, these standards must be strengthened.

Remedy: We propose that SX-STD-CBBCA-01 be revised to simply state:

? SX-STD-CBBCA-01: New permanent or temporary roads shall not be allowed.

We propose the addition of the following standard:

? SX-STD-CBBCA-03: New mechanized trails shall not be constructed or designated.

Objection 09: We object to the suitability statement:

? SX-SUIT-CBBCA-01: The backcountry area is suitable for motorized transport on existing system motorized routes and areas. The backcountry area is suitable for mechanized transport. Mountain biking is suitable only on approved system mountain biking routes.

As discussed, the Buttes are not geographically nor culturally suitable for motorized and mechanized recreation beyond the major access road. In concert with our suggested remedies to the Desired Conditions and Standards plan components for the Chalk Buttes BCA, the suitability statement must also be strengthened to better reflect the current conditions and intended impact of the BCA allocation to protect those current conditions.

Remedy: We propose the revision of the suitability statement as follows:

? SX-SUIT-CBBCA-01: The backcountry area is suitable for motorized transport on existing system motorized routes. The backcountry area is suitable for mechanized transport on existing approved system mountain biking routes.

2. DESIGNATED WILDERNESS AREAS

Objection 10: We object to the failure of the Forest Plan to contain a goal to complete specific Wilderness Management Plans for the Absaroka-Beartooth Wilderness and the Lee Metcalf Wilderness.

The CGNF manages two spectacular Wilderness Areas, covering a total of 35% of the Forest, the Lee Metcalf and the Absaroka-Beartooth, affectionately known as the 'AB.' The existing Wilderness Management Plans for each of these areas that were appended to the 1986 and 1987 forest plans will not be carried forward with the adoption of this new plan. While Wilderness Management Plans are not explicitly required in the Wilderness Act, the enabling acts of either the AB or the Lee Metcalf, or Forest Service Manual 2300, it is clear from past management that specific plans are warranted for this Forest. There is no discussion or explanation as to why designated Wilderness Management Plans were not included in this planning process nor why the draft Final Plan lacks a commitment from the Forest to complete such planning.

While forest plans certainly are the proper place to establish a strong foundation for forest-wide Wilderness management including overarching goals, objectives, and standards, a forest plan that covers management for an entire forest - certainly one as diverse as the Custer Gallatin - is not the proper place for strong, lasting, and dynamic designated Wilderness management. The foundation provided in a forest plan should be leveraged in a separate document for designated Wilderness management specifically. A Wilderness Management Plan that exists outside of the forest plan will also be more flexible for long-term sustainability of that plan. Limiting management prescriptions to the forest plan means that any need to respond to new conditions would only be possible through a forest plan amendment.

The current goals, standards, and suitability language lacks strong baseline narrative and quantitative foundations. Forest Service Manual 2322.03 states: "Monitoring requirements for determining whether prescriptions, standards and guidelines are met." To accurately determine if those prescriptions, standards, and guidelines are met, the Forest needs to have a clear understanding of the current, existing conditions in each the AB and the Lee Metcalf, and clear metrics to monitor and measure changes to those conditions. Wilderness Management Plans are a more suitable place for these discussions, as they can be more detailed, site-specific, and flexible to respond to the changing conditions and needs of the Wilderness areas than forest-wide language in a much broader forest plan.

Because designated Wilderness is such an important part of the overall forest, it is imperative that these two areas have adequate, specific management prescriptions that exist outside of the forest plan. New Wilderness Management Plans for the AB and Lee Metcalf can and should be drafted and appended to the final forest plan, just as the existing plans are appended to the Custer and Gallatin forest plans. Maintaining and enhancing the integrity of the AB and the Lee Metcalf must be a priority for the Forest over the life of this new forest plan.

Remedy: We propose the following goal be added:

? FW-OBJ-DWA-05: Custer Gallatin National Forest completes Wilderness Management Plans for the Absaroka-Beartooth Wilderness and the Lee Metcalf Wilderness areas within two years of finalizing this Forest Plan.

Objection 11: We object to the lack of a standard that specifically maintains Zone 1 areas as trailless.

Zone 1, the most primitive zone of a designated Wilderness area is "essentially unmodified natural environment exhibits the highest degree of natural integrity" and is "generally trailless, with no system trails." In order to maintain those desired conditions and to clarify how FW-GDL-DWA-01 will be implemented, a clear limitation that new trails will not be recognized nor established in the pristine zone is needed. This also will strengthen FW-STD-DWA-10 that prevents designated campsites in Zone 1: if there are no designed campsites, it makes sense that such an experience should be matched and ecological integrity maintained with a lack of system trails.

Remedy: We propose the following standard be added:

? FW-STD-DWA-15: New trails shall not be designated or constructed in Zone 1 areas of the Absaroka-Beartooth and Lee Metcalf Wilderness areas.

3. FOREST-WIDE MANAGEMENT

Objection 12: We object to the DROD's vague commitment to "initiate site-specific planning per the plan's suitability direction as soon as practicable from the date of this decision." This is a less specific time frame for implementation than other recent Region 1 plan revisions. Both the Flathead National Forest final ROD and the Helena-Lewis & Clark draft ROD have at least committed to initiate site-specific planning to implement their plans' RWA suitability direction for motorized/mechanized transport within 3 years of signing the final RODs. Timely travel planning is something we raised on page 23 of our DEIS comments. It is extremely important that the travel plan is in alignment with the revised forest plan.

Remedy: At a minimum, the Final ROD should commit to initiating the site-specific planning "as soon as practicable but no later than 3 years from the date of this decision."

Objection 13: The forest wide backcountry area direction should include a standard to limit motorized trail construction or designation. There is a discrepancy between how backcountry areas are described in the FEIS versus the Draft Plan. Table 155 in Volume 2 of the FEIS, summarizes the management direction for backcountry areas and states that construction or designation of new motorized trails is not allowed in backcountry areas yet this direction is not included in the Draft Plan. As with other direction in Table 155, this should be included as a standard in the forest wide direction for backcountry areas.

Remedy: Include the following standard in Alt F for the Final Plan: (FW-STD-BCA) 07: Construction or designation of new motorized trails is not allowed.

Objection 14: The draft Final Plan does not fully address how the forest will sustainably manage recreation in BCAs to reduce impacts to wildlife even as recreation use increases, nor are there monitoring questions to assist the forest in tracking its success on this front. We appreciate that wildlife conservation is woven throughout the 2020 Plan, from forest wide direction specific to wildlife, to the designation of key linkage areas, to monitoring questions such as MON-WL-02 and 03. However, we are concerned that the draft final plan does not recognize the unique wildlife values that exist in backcountry areas such as the Buffalo Horn, West Pine, Crazy Mountains, and others. While all of the backcountry areas on the forest are important for wildlife, this value is not apparent in the draft Final Plan. There should be desired conditions associated with each backcountry area that specifically speak to the wildlife values of that area. We suggested such desired conditions in our DEIS comments. Likewise, the plan should include direction that will help improve habitat conditions over the life of the plan. This should not be limited to just forest wide direction.

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

(FW-DC-BCA) 02: 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.

4. CONCLUSION

Thank you for the opportunity to submit objections during this important process. We appreciate the hard work of the Forest Plan Revision Team and other CGNF staff during this Forest Plan Revision process. The CGNF, sweeping from West Yellowstone all the way across the plains to South Dakota, encapsulates the best of the remaining wild public lands, not just in southwest Montana, but arguably in the country. The wilderness values are some of the best assets on the Forest, and this plan revision is a critical nexus in forest management to protect these incredible landscapes for the plants, animals, and people who depend on these areas.

We look forward to continued work with the CGNF team moving forward.

Sincerely,

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