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Responsible Official: Mary Erickson Custer Gallatin National Forest Supervisor 10 E. Babcock?Bozeman, MT 59715

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Note: I submitted comments on the draft EIS

Re: Custer Gallatin National Forest Plan Revision, Project 50185

Submitted <https://cara.ecosystemmanagement.org/Public//CommentInput?Project=50185> on September 8, 2020

Lionhead (Earthquake) Recommended Wilderness Area.

Objection 1:

I object to the proposed decision (Alt F) to remove wilderness protections from the Lionhead Recommended Wilderness within the protected corridor of the Continental Divide National Scenic Trail and the linked reclassification of historic wilderness (pack and saddle) trails, including the CDNST, as "mountain biking trails."

The Continental Divide National Scenic Trail is a foot and horse trail. It's nature and purposes are defined and protected by law. The CGNF has no legal authority to alter and undermine its protected nature and purposes. The CGNF has a legal obligation to keep areas recommended for wilderness in the CDNST corridor "unimpaired" for future designation as wilderness.

No previous plan authorized conversion of recommended wilderness and its trails into bikecountry, and no previous travel plan determined mountain biking to be suitable in recommended wilderness, contrary to misleading statements in the record.

On the contrary, both forest supervisors who examined the facts stated that mechanized travel did not belong within recommended wilderness. Gallatin Supervisor Becky Heath and Custer-Gallatin Supervisor Mary Erickson both proposed that mechanized travel "be prohibited" within the Lionhead Recommended Wilderness.

In the ROD for the 2006 Gallatin Forestwide Travel Plan. Supervisor Rebecca (Becky) Heath stated "mountain bikes should be prohibited" within Lionhead recommended wilderness.

In 2008, Supervisor Mary Erickson concurred with her predecessor stating that the Forest believes "...mountain bikes should be prohibited on trails within the Lionhead recommended wilderness area" to protect its future as wilderness.

No decision was ever made.

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 the six-year public process that resulted in the 1987 Gallatin Forest Plan. Though there were dozens of

outstanding candidates, no other area with trails was recommended for wilderness designation.

Congress agreed with the Forest Plan recommendation. In 1988 the House and Senate agreed and passed legislation to designate the 22,800-acre Earthquake Wilderness on the Gallatin National Forest. This bill remained unsigned, leaving area wilderness protections to the forest plan.

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." - CDNST Comprehensive Plan, FSM 2353.42, and 74 FR 51116)

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

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 ...establish a management area for the CDNST that is broad enough to protect natural, scenic, historic, and cultural features (FSH 1909.12)."

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. (Map attached) The 2009 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... the CDNST must be managed so as to leave the area unimpaired for inclusion in the National Wilderness Preservation System. (Oct 5, 2009 Federal Register on CDNST Comp Plan)

The final revised forest plan must be made consistent with national direction for the CDNST. The intertwined "primitive" recreation and conservation purposes of the Continental Divide National Scenic Trail are the legacy of legendary conservationist Benton Mackaye, who worked with Bob Marshall to create The Wilderness Society.

Mechanized travel is not a primary purpose of the CDNST. Mountain biking is not listed as a "compatible" recreational uses of the CDNST. Nor, as the decision mistakenly alleges, is mechanized travel classed as "suitable" on the CDNST. (Based on national direction I created the attached CDNST suitability chart)

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.

Continental Divide Wildlife Corridor

West of Yellowstone, the CDNST traverses Lionhead recommended wilderness, the core of an essential wild bridge fostering movement of grizzlies, lynx and wolverine between Yellowstone National Park and recommended wilderness to the west in the Centennials, Lima and Italian Peaks or the High Divide-Idaho linkage zone. Outside the RWA, private and public lands are heavily roaded, used by ATVs, bikes and snowmobiles, with increasing subdivision and development of private lands, even on the Continental Divide. Removing wilderness protections cuts at the underpinnings of this wildlife bridge, increasing disturbances almost certain to adversely affect wildlife use over time. Mechanized technology and marketing continue to change in ways that accelerate speed, steepness and distance covered. Converting recommended wilderness into day use bike zones (year-round) adds mechanized disturbances and an increased likelihood of surprise encounters in core remaining wilderness habitats.

The proposed removal of wilderness protections will directly impact and undermine recommended wilderness on the Caribou-Targhee National Forest.

In the summary, Supervisor Erickson states that:

Recommended wilderness or backcountry area allocations were used to call out those areas for which additional protective measures were desired to maintain wilderness characteristics or preserve the existing condition and current character.

Alt F subtracts 12 "protective measures" which protect Lionhead if it remains Recommended Wilderness. The plan components for Lionhead degraded to mechanized backcountry allow recreation developments, races, unlimited mechanized traffic, drone launchings, timber harvest and hardrock mining.

Nor does this "preserve the existing condition" of Forest Service recommended wilderness.

Finally there is the empty claim that ""No new uses that would detract from the area's character would be allowed" a claim we are supposed to swallow at the same time the forest allows new uses (unlimited mechanized traffic) to remove three plus decades of wilderness protection. Next up e-bikes, drones, televised races, mechanized skateboards, etc.

Remedies:

*Lionhead Recommended Wilderness is retained and expanded (27, XXX with wilderness protections applied without further delay.

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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 this three changes are necessary in Continental Divide National Scenic Trail plan components:

Desired Condition (MG-DC-CDNST) o8 is added as follows:

08 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.

Suitability (MG-SUIT-CDNST)

MG-SUIT-CDNST-03 and 04 are revised as follows:

03 The Continental Divide National Scenic Trail is not suitable for winter motorized over-snow vehicle in recommended wilderness. transport over and around the trail, as long as such use does not substantially

interfere with the nature and purpose of the trail.

04 The Continental Divide National Scenic Trail is not suitable for mountain biking within recommended wilderness. Outside RWA, mountain biking is conditionally suitable and may only be allowed following analysis of the effects of mechanized traffic on the as long as such use does not substantially interfere with the nature and purpose of the trail.

Support for the Gallatin Forest Partnership

Cowboy's Heaven in the Metcalf Wilderness

Objection 2: I wish to express my support to the objections/ solutions of the Gallatin Forest Partnership regarding the failure to protect Hyalite as recommended and to recommend Cowboy's Heaven for inclusion in the surrounding Lee Metcalf Wilderness.

Surrounded on three sides by wilderness and recommended wilderness, Cowboy's Heaven is the missing link in the Lee Metcalf Wilderness. The other side borders the Flying D, which provides public trail access and buffers wild public lands with the largest private conservation easement in Montana. (See map attached)

The Gallatin Forest Partnership recognize and recommend that Cowboy's Heaven be protected as wilderness, connecting wild land conservation (public and private) across the north Madison Range. So too the neighboring Madison Ranger District and Beaverhead-Deerlodge National Forest which recommended the west side of Cowboy's Heaven for wilderness in 2009.

I have often crossed the gentle rise where the Beaverhead and Gallatin Forests blend. The wild national forest lands here are one and the same. It is so very surprising to experience days in Cowboy's Heaven and realize when you return how close such solitude and wildness is to the booming Gallatin Valley. Wilderness best keeps it so.

Solution: Recommend the Custer-Gallatin side of Cowboy's Heaven for inclusion in the Lee Metcalf Wilderness just as requested by the Gallatin Forest Partnership.

Objection 3- Crazy Mountains Wilderness

First, I wish to express my heartfelt appreciation to Supervisor Mary Erickson for a first step in recognizing the unique cultural and historic significance and wilderness values of the Crazy Mountains. Thank you for listening.

My objection is a petition to take this proposed decision further, to act while it is yet possible to protect, restore and prevent loss of their wild character.

As the largest land owner (public trustee) in the wild Crazy Mountains, the U S Forest Service should act in the long term public interest to fully preserve wild character on remaining national forest roadless and trail-less lands. With respect to landowners, some are stewards, yet private landowners should not dictate how public lands are managed.

The wild heart of the Crazies is best managed as recommended wilderness, from the mouth of magnificent Cottonwood Canyon (including sections 4, 9 and 16) to Big Timber Falls, and north to the American Fork and Sunlight Creek.

Likewise travel plans should not block consideration of recommended wilderness in this once in three decades forest plan. Rock Creek should be non-mechanized and Cottonwood protected not discarded, including sections 4,9 and 16. (see attached maps of Crazy Mountains)

Solutions

- 1.The Crazy Mountains Recommended Wilderness should expand to include roadless national forest lands including Sections 4,9, and 16 in Cottonwood Canyon on the west side to Big Timber Creek by the falls on the east side and north to include Campfire Lake Basin, Sweetgrass Creek, Sunlight Basin and the American Forks. (Alternative D)
- 2.Crazy Mountains Backcountry Area (CMBCA) should clearly prohibit mechanized uses.
- 3.I support Crow (Apsaálokee) requests for stronger protections and commitments to meaningful consultation.

Thank you for this opportunity to file objections and suggested solutions for the final Custer-Gallatin NF Plan.

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