

Data Submitted (UTC 11): 9/9/2020 12:11:49 AM

First name: Nike

Last name: Stevens

Organization:

Title:

Comments: Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

☒ Land Management Plan

☐ Regional Forester's List of SCC

Statement of issues and/or parts of the plan revision to which the objection applies:

Lack of protection of Wilderness Study Areas. Lack of Wilderness recommendations for deserving Wilderness areas. Lack of acknowledgement of the Custer Gallatin National Forests' history of disregarding legal requirement to protect Wilderness values. Inadequate protection of wildlife habitat especially wildlife movement corridors. Use of Backcountry designation which is legally meaningless and is misleading. The Backcountry designation sounds like it is keeping areas wild when in reality the designation offers no real protection.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

\*The reasons for this objection are: A strong belief that the current proposed Forest Plan does not adequately protect wilderness and wildlife habitat within the Custer Gallatin National Forest and that if it is adopted as proposed it will result in decline of the Forest's ability to support species sensitive to human disturbance and species whose long term genetic viability depends on connections between the Custer Gallatin National Forest and other wildlands. Disappointment at the lack of consideration of the role that uncut forested ecosystems have in mitigating our global warming crisis by storing carbon.

\*Proposed Solution: Adopt Wilderness recommendations in Alternative D to remedy the deficits evident in the current proposed Custer Gallatin Land Management Plan. I specifically urge recommendation of the entire Hyalite Porcupine Buffalo Horn WSA as designated Wilderness because of its unique important as habitat for sensitive species such as Grizzly, wolf, and bighorn sheep and a link to wildlands to the north and west. I recommend the proposed Plan adopt the wilderness acreages recommended in Alternative D in the Lionhead, Crazy Mountains, Bridger Mountains, Pryor Mountains and additions to the Lee Metcalf Wilderness including the Cowboy Heaven area and additions to the Absaroka and Beartooth Wilderness. Many of these areas have been preserved through sacrifice of other areas to development at Big Sky and other places and have been part of earlier Wilderness legislation that failed to pass by some political quirk despite wide support locally and nationwide. They all have true Wilderness quality and the potential to buffer sensitive wildlife populations from the threats of increasing human recreation pressure and human caused climate change in the future. It is an unfortunate circumstance that mountain bikers and motorcyclists have been allowed to run rampant over WSAs and that the Forest Service has failed in its legal requirement to protect the wilderness character of some of these areas - however now is the time to remedy those mistakes not to enshrine them within the new Forest Plan. If you continue with the proposed Forest Plan you are committing to loss of Wilderness quality landscapes that will be sorely needed by humans for peace, beauty and tranquility and by sensitive wildlife for survival in the future.

The Custer Gallatin National Forest Land Use Plan must recognize that only through strong legal protection as designated Wilderness can wild landscapes and habitat for sensitive wildlife be maintained in the future given the intense pressure of ever increasing human recreation on these landscapes. Any door that you open now will increase use 2X, 5X, 10X in the future.

I also want to state that the Gallatin Forest Partnership and its predecessor the Gallatin Community Collaborative do not represent me or most other people even locally. The group was set up in a way that excluded anybody with a job a family or any significant time commitment. From the get go it ignored science basically divided

people in groups of wants ie motorheads, mountain bikers, resource developers or Wilderness advocates. What was lacking was a voice for wildlife, data on what were the most unique and important resources the Forest offered and where and true grassroots engagement. Indeed the Partnership excluded groups because they advocated positions that did not agree with the few organizations in control of the group.. The Forest Planning team needs to recognize the limited relevance of the Partnership.

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I also believe that the list of sensitive species is ridiculously short excludes all of the large wilderness reliance species that reach in some cases their southernmost range in Greater Yellowstone ecosystem of which the Custer Gallatin makes up a large segment and that by being inadequate it wrongly and probably illegally limits the proposed Forest Plan.

Statement demonstrating the link between objection and prior formal comments: I submitted comments in earlier comment periods - including in June, 2019 and March 2018. I attended a week of meetings of the Forest Collaborative until I was bored stiff and convinced that only those who were paid to attend could afford to spend the enormous amount of time required. It was also clear that the Collaborative was ignoring the science regarding the importance of wildlife habitat in the Hyalite Porcupine Buffalo Horn Wilderness Study Area. I also attended at least one public meeting near the initiation of the process.