

Data Submitted (UTC 11): 1/10/2018 2:35:36 AM

First name: Nancy

Last name: Ostlie

Organization: Great Old Broads for Wilderness, Bozeman

Title: Volunteer leader

Comments: Thank you for all of the work you have put into the Forest Plan to date. I appreciate that you have many specialists working to put together the best possible plan to guide the Forest for decades to come.

I plan to submit more specific comments later. However, at this time, I want to state that the 70,000 acres recommended for Wilderness in the Gallatin Range are far too few. The Hyalite Porcupine Buffalo Horn Wilderness Study Area is about 155,000 acres, and adjacent roadless lands are primitive and deserving of the highest possible protection for the lands, as Wilderness. Our primary concern is for habitat to sustain the many precious species of the Greater Yellowstone Ecosystem. The iconic species like bison, grizzlies, wolverine and lynx deserve opportunity on this landscape, not to mention the old trees, native plants and smaller creatures that make up an ecosystem.

I flew over the Gallatin Range two days ago, and looked down with perfect visibility from the plane on lands that appeared to be entirely untouched. One might remark, there is 'nothing' there! After flying over lands from South America through the U.S., I assure you that there are despoiled lands everywhere, nothing like their original appearance. This is not just "any" national forest.

So to read details about how some of these areas in the Gallatin would be "difficult" to manage as Wilderness, makes me want to probe every detail of what is stated in the Forest Plan Proposed Action. And I will do so. In the first place, how "difficult" is it to manage Wilderness when all you have to do is keep non-conforming uses OUT? You can let fires burn, let natural processes be the norm, and allow wildlife to move freely on the landscape without the intimidation of motorized and mechanized users charging through their habitat. So what if there is a highway a mile away? The animals already are dealing with that, and if they only have to contend with people on foot or on animal transport (horseback), they can move about within Wilderness at their own speed to safe habitat. I grant that a cherry-stem exception must be made for Hyalite Canyon Road, which is paved and allows some limited access for hiking, skiing, fishing, non-motorized boating, rock and ice-climbing. The number of developed facilities on the roadside is small -- toilets, parking lots, a cabin, and a development at the reservoir for groups to picnic and recreate. There are only a few established campsites, relatively speaking. I appreciate the management of those areas to date, which maintain a pristine backcountry setting. Compared to other destinations in the United States, this one is quite "pristine" and needs to be kept that way.

Polygon Number GALLATINS 28 in particular strikes me as being based on many debatable statements that are somewhat arbitrary. A blanket statement that "the Interior of the area provides for primitive recreation and solitude WHILE THE PERIPHERY PROVIDES MORE DIVERSE RECREATIONAL OPPORTUNITIES CLOSE TO COMMUNITIES" (emphasis added) is a subjective judgement that meets common sense, but actually overlooks that there are NOT many diverse recreational activities happening close to the communities -- only a FEW areas in the Forest are accessed by 'non-conforming' uses such as mtn. bikes -- and in those areas that the Forest Service has condoned trail-building and development in, despite the known controversy about potential Wilderness designation being hotly contested in the community.

The Forest Service was sued successfully in 2006 for not providing adequate opportunity for solitude with their travel plan. At that time, the FS repealed SOME 'non-conforming uses' within the Wilderness Study Area, but appeased local motorized users by continuing to permit some other uses in the WSA.

The law states that WSA land must be administered in a way that will not preclude its being considered for national Wilderness Preservation. That means that uses allowed on the forest must NOT obviate future status of the lands as Wilderness. For the Forest Service to state that existing 'non-conforming' uses would make it

difficult to administer Wilderness, is to break the law. Just as some prior uses were closed to 'non-conforming' uses, now the rest of the similar uses that have been permitted must also be closed.

When I think of the people like my family members who would then be excluded from some of their favorite mountain bike trails, I would point to the level of roaded lands we have in this community, this state and this nation, which must provide ample opportunity for recreation outside of critical wildlife habitat. And wildlife habitat is what underlies our concerns for ample Wilderness.

EVERY place has potential recreational opportunities, that is NOT unique. Every place is NOT connected to YNP.

"Opportunities for solitude are primarily found in the southern and eastern areas" also seems a subjective statement to me. I have found wonderful opportunities for solitude etc. on walks in the Triple Tree area, Kirk Hill, South Cottonwood, and many locations in the Bridger Mountains, comparatively. What IS the point of comparison -- New York City Streets? Yosemite? The Grand Canyon? I have hiked many trails from Chestnut and the Hogback in Paradise Valley, to areas at the end of the Storm Castle drainage, and encountered features that characterize wilderness.

I object to the mention of noxious weeds established in some areas. (28 acres) These infestations are entirely the result of 'non-conforming uses' allowed by the Forest Service, or use by permitted outfitters. These conditions would not be difficult to restore, and my group would be glad to volunteer to do this work.

"Checkerboard ownership" is cited as a problem but that is misleading after the huge elimination of most checkerboard ownership in the area in recent decades. Let's remember that trades were made that forever prevented nearby wilderness-quality lands from achieving that status, so what checkerboard ownership still exists is paltry in comparison and should be resolved in time.

The municipal watershed management issue seems could be managed in conjunction with local authorities in the city and county. Why would this factor prevent the Forest Service from recommending protection from adjacent lands?

The Big Sky Snowmobile Trail was established with minimal public input, by a forest service official in the 1990's. I am in favor of honoring that access, potentially, but not further development of the area for continuing and expanded 'non-conforming' uses. The real problem is that this trail cuts through critical grizzly bear habitat, a Bear Management Area. How are these designations compatible?

Finally, I do not understand how mineral rights allowed under a law from the 1800's could stop these areas from being considered as Wilderness. Recommend the areas, all 155,000 acres plus, as Wilderness, and force the mineral leases to be terminated. I think we all know how our Senator Jon Tester would come down on the idea of mineral leases in our backyard being permitted.

For now,

Nancy Ostlie
Leader, Bozeman Broadband
Great Old Broads for Wilderness
406-556-8118