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Comments: Wilderness Recommendations

Dear CGNF

Please accept these comments on plan revision.

I am a long time visitor to the CGNF. As background, I have previously worked as a backcountry ranger/biologist in the Gates of the Arctic NP, a wilderness guide in Alaska, a river ranger in Alaska, a biologist and botanist for the BLM in Idaho. I also worked as a hunting guide in the AB Wilderness. My former wife was a wilderness ranger and biologist on the forest. I've spent years exploring the CGNF. The main attraction of the forest to me is the abundance of wild country.

The Custer Gallatin National Forest (CGNF) is the epicenter to the most spectacular wildlands in the Nation. These wildlands are home to some of the best wildlife habitat in the country, and is habitat to grizzly bear, lynx, wolf, elk, moose, mountain goat, and bighorn sheep, as well as the source of waters that support genetically pure Yellowstone and West Slope cutthroat trout.

It's important to remind the CGNF that it is not the nation's woodbox, or feedlot, nor should it be the nation's outdoor gymnasium. What the CGNF does best is provide for high-quality wildlands.

Wildlands protection is critical to the quality of life of the region's communities, and essential to the outdoor economy that draws visitors, as well as contributing to the well being of residents providing clean water, important fish habitat, critical wildlife habitat, and scenic beauty.

According to Conservation Biology principles, larger protected areas are better than smaller patches of habitat. That is one reason larger unprotected wildlands, especially if they are contiguous existing protected areas. So adding adjacent roadless lands to existing wilderness is important for enhancing the overall conservation value.

In addition, some wildlands are critical corridors for the movement of wildlife between other protected landscapes. For example, the Bridger Range can serve as a corridor connecting the Greater Yellowstone Ecosystem to other lands further north.

With that in mind, the CGNF proposed wilderness recommendations in its draft Forest Plan are inadequate.

Here's what the CGNF recommended for wilderness. Not a single acre in the Crazy Mountains or Bridger Range and paltry wilderness recommendations for the Gallatin Range and Pryor Mountains.

Lost Water Canyon, Pryor Mountains 6,804 acres

Line Creek Plateau, Absaroka Beartooth Mountains, 801

Red Lodge Creek-Hell Roaring, Absaroka Beartooth Mountains 802

Mystic Lake, Absaroka Beartooth Mountains 247

Republic Mountain, Absaroka Beartooth Mountains 388

Gallatin Crest, Gallatin Mountains 70,614

Sawtooth, Gallatin Mountains 14,827

Taylor Hilgard, Madison Mountains 4,466

Lionhead, Henrys Lake Mountains 17,983

Total Acres of Recommended Wilderness Areas by the CGNF is 116,392.

GALLATIN RANGE

The Gallatin Range is the largest unprotected roadless area in Montana and a key part of the Greater Yellowstone Ecosystem. The Gallatin Range portion of the CGNF stretches 50 miles from Yellowstone Park north to Bozeman including the popular Hyalite Canyon area.

The FS identified some 251,700 acres in its Wilderness Inventory Polygon 28 which includes the Hyalite--Porcupine-Buffalo Horn WSA, but it is not all inventoried roadless a portion of the full Gallatin Range Roadless area which extends south into Yellowstone NP and takes in over 546,000 acres.

The CGNF appears to use the "purity" argument to disqualify many areas from its recommendations saying there is noise from highway traffic, a municipal watershed, or a few cabins or other structures that do not conform to the Wilderness Act. This argument is used to exclude tens of thousands of acres from its recommendations.

The Gallatin Range higher elevations feature glacially carved cirques, and grassy ridges. There are a lot of open grassy valleys and slopes which are exceptional wildlife habitat, particularly the Porcupine-Buffalo Horn Drainage where thousands of elk winter. Three drainages--Mol Heron, Tom Miner, and Rock Creek-- that flow from the Gallatin Range are considered essential Yellowstone Cutthroat trout habitat by Montana Fish Wildlife and Parks. The Gallatin Range also supports grizzly bear, wolf, mountain goat, wolverine, bighorn sheep, moose, mule deer, and potentially wild bison.

The largest petrified forest in the world is found at the headwaters of Porcupine, Rock, Tom Miner, and Buffalo Horn drainages. Commercial and amateur collectors have ravaged this world-class complex. Wilderness designation would help to halt this tragic damage.

Since 1977 approximately 155,000 acres have been protected as the Hyalite, Porcupine and Buffalo Horn Wilderness Study Area. In total there are about 230,000 acres of potential wilderness, but the CGNF has only recommended about 85,000 in two units and proposes that the Buffalo Horn drainage be designated a backcountry area. The Buffalo Horn drainage is the most important wildlife habitat in the entire Gallatin Range--if any area should be wilderness it is this drainage. Also many roadless drainages in the Gallatin Range were left out of wilderness recommendations including the upper portions of Cottonwood, Sourdough, Trail Creek and others.

For more on the Gallatin Range see the Montanans for Gallatin Wilderness web site located at this link <http://www.gallatinwilderness.org/>

MADISON RANGE

A significant portion of the Madison Range is protected within the Lee Metcalf Wilderness. However, 111,000 acres in the Cabin Creek Recreation and Wildlife Management Area lies between the Taylor Fork and Hebgen Lake and is sandwiched between the Monument Peak area and the main crest of the Madison Range. This exceptional wildlands is without wilderness protection. It is critical grizzly bear habitat, and also could support wild bison herds. Nearly 50 miles of stream support West Slope Cutthroat trout.

The FS does not recommend wilderness here because of on-going biking and ORV/snowmobile use, but that is no excuse. The area easily qualifies for wilderness based on its essential character and should be added on to the Lee Metcalf Wilderness.

Another significant 43,000 acre roadless area lies between Big Sky and the Taylor Fork. This area of rolling hills, open meadows, and scenic view is also critical wildlife habitat. It includes Buck Ridge. The area should be added to the Lee Metcalf Wilderness. Grizzly bear are utilizing this area.

A third 17,000 acre roadless portion of the Madison Range north of the Spanish Peaks that includes the upper Cherry Creek and Spanish Creek drainages would connect the Madison Canyon and Spanish Peaks as a continuous unit. Known as Cowboy's Heaven, it is part of a 26,000 acre roadless area that is split between the CGNF and BDNF;. It should be added to the existing Spanish Peak unit of the Lee Metcalf Wilderness. It contains some of the best lower elevation big game habitat, and is used by several thousand elk.

PRYOR MOUNTAINS:

The Pryor Mountains lie south of Billings and are primarily limestone. There are deep canyons and grassy ridgelines. The area is part of a larger roadless area that could contain lands managed by the BLM and NPS. The FS recommends a paltry 6804 acres in Lost Water Canyon for wilderness. Wilderness in the Pryors could be expanded with the closure of a few tracks and dirt roads. For more information see

Support 13,000 acres in the Lost Water Crooked Creek area - not just the 10,421 CGNF Inventoried Roadless. ALL of this area passed the U.S. house in Pat Williams' Wilderness bill in 1994. (In 2015 BLM added 11,00 acres of Lands with Wilderness Character to their 22,000 acres of WSAs from the 1980s.)

In addition, there are three more roadless areas that should be protected as wilderness.

Punch Bowl / Dryhead Creek Canyons RWA (~8,500 acres) of an incredible wild country. This will require converting at least a couple miles of unfortunate 4WD road to motor-free along the ridge between the two canyons.

Big Pryor RWA (12,000 acres) (A couple miles of little used "motorized trail" ought to be converted to motor-free to improve the integrity of the area.)

Bear Canyon RWA (10,000 acres) This one should be a total "no-brainer as there are no roads here.

CRAZY MOUNTAINS

Rising 7,000 feet above the plains (as much as the Tetons rise above Jackson Hole), the Crazy Mountains have numerous peaks over 10,000 feet, including 11,201 foot Crazy Peak. The range also harbors 30 alpine lakes and even a few small glaciers. The range is well known for its geological radiating volcanic dike system and heavily glaciated peaks and valleys. The range is considered sacred to the Crow Tribe. The Crazy Mountains have been included in previous wilderness bills.

The CGNF recommended no wilderness in the Crazy Mountains. Part of their rationale is that there are checkerboard inholdings in the range. However, the CGNF identified 90,690 acres as roadless, but split this into two units for no apparent reason. This is considerably less than the 135,500 acres the FS identified as roadless in the 1980s. Conservationists should insist that at least 90,690 acres be recommended for wilderness with the caveat that private inholdings should be aggressively removed through land trades or purchase.

Conservationists should recommend a 90,000 acre wilderness.

ABSAROKA BEARTOOTH WILDERNESS ADDITIONS

There are many potential additions to the AB Wilderness. Starting in the East, there is the Line Creek Plateau near Red Lodge. Steep timbered canyons flank this high alpine grassland which supports 20 rare or uncommon plants. The plateau is over 10,000 feet in elevation. The CGNF has recommended only 801 acres out of 32,983 roadless acres with some on the Shoshone NF. The plateau is so special that the FS has designated 16,127 acres as the Line Creek Research Natural Area. At least 30,000 acres should be recommended for wilderness.

The West Fork and Lake Fork of Rock Creek by Red Lodge and the Beartooth Front from Red Lodge to East Rosebud drainage comprise 34,640 acres of roadless lands adjacent to the existing AB Wilderness that includes 27 miles of trail. The West Fork of Rock Creek is the municipal watershed for Red Lodge. In particular, all the roadless lands in both the glaciated valleys of the West and Lake Forks of Rock Creek should be recommended as wilderness.

The 25,000 acre East Rosebud to Stillwater Roadless area along the Beartooth Front provides for the access to East and West Rosebud, as well as Stillwater trailheads. All should be protected as wilderness.

Along the north face of the AB Wilderness are any number of roadless lands that should be added to the list of recommended wildernesses, including the 129,000 Deer Creek drainage lying between the Boulder River and Stillwater River, and includes lands surrounding the East Boulder, Lower Deer Creek, Upper Deer Creek and Bridger Creek. This area, which is mostly foothill terrain, is largely missing from the AB Wilderness. It is important elk and deer habitat, not to mention genetically pure Yellowstone cutthroat trout in the upper Deer Creek drainages. At least half of this area could be managed reasonably well as wilderness.

The 5,000 acre Mount Rae between the Boulder and West Boulder Rivers is another area with aspen and meadows and good wildlife habitat.

The 8,000 Tie Creek/Mission Creek/Livingston Peak including the north face of Shell Mountain with trailhead access near the 63 Ranch east of Livingston Peak provides the scenic backdrop to Livingston. Little Mission and Mission Creek both harbor genetically pure cutthroat trout. All of this area should be protected.

In Paradise Valley, much of the lower foothills of the Absaroka Mountains are not within the wilderness, the entire roadless terrain of 13,000 acres from Deep Creek to Strawberry Creek along the Absaroka Front should be added to the AB Wilderness.

Also, Chico Peak, Emigrant Peak and Dome Mountain 56,000 acre roadless reaches from Cedar Creek by Gardiner north to Passage Creek in the Mill Creek drainage. Except for existing mineral claims, the entire area should also be added to the AB Wilderness. These lands are critical migration corridors and winter range for elk and bison moving north from Yellowstone as well as important grizzly bear habitat. Six Mile Creek has pure Yellowstone Cutthroat trout populations. One way to make a mine in Emigrant Gulch more difficult is if all these lands were designated wilderness.

BRIDGER RANGE

The dramatic face of the Bridger Range walls in the eastern side of the Gallatin Valley. The Bridger Bowl Ski area is located on its eastern flank. The Bridger Range is an important corridor between the Greater Yellowstone Ecosystem and Central Montana. The range supports important winter deer habitat at lower elevations and its streams hold genetically pure West Slope Cutthroat trout and Yellowstone Cutthroat trout. Approximately 45,000 acres of the Bridger Range is roadless and surprisingly the FS did not recommend a single acre for wilderness. The area around Blacktail Peak in the northern Bridger Range has about a third of this roadless component and should be recommended for wilderness.

LIONHEAD (SOUTHERN MADISON RANGE)

The 32,000 acre Lionhead Roadless area includes 18 miles of the Continental Divide Trail and lies to the west of Hebgen Lake. There are a number of alpine lakes, dramatic cirques, and many open meadow areas. The area is a critical corridor that links the Yellowstone Park area to the Lee Metcalf Wilderness and the ranges to the West including the Centennial Mountains and Gravelly Range. The CGNF has recommended nearly 18,000 acres as wilderness, though their 1986 Forest Plan had recommended 22,000 acres for wilderness. They should be commended for including the Lionhead, but the recommended wilderness should be enlarged to include most of the 32,000-acre roadless area.

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