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Organization:

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Comments: Below are comments I have on the Custer Gallatin Forest Plan Revision #50185.

I appreciate your time and ability to look over these comments.

#### Management of Recommended Wilderness

I'm in support of the Proposed Action's management direction for Recommended Wilderness Areas. It suggests that "Recommended wilderness areas are not suitable for motorized or mechanized recreation." The language could be strengthened by setting the following standard regarding Recommended Wilderness Areas:

Standard 13: Wheeled or motorized vehicles designed for the primary purpose of transporting people, except for wheel chairs, are prohibited in recommended Wilderness except for permitted or administrative uses.

Please consider adding this language to the plan and applying a "primitive" ROS setting to RWAs.

#### Gallatin Range

I'd like to see the Gallatin Forest Partnership's (GFP) recently reached agreement on roughly 250,000 acres of conservation protections in the Gallatin and Madison Ranges included as an alternative to the current plan.

I agree with the GFP and support the inclusion of the Big Creek drainage in Recommended Wilderness. Please re-evaluate your decision to exclude a critical corridor of the Gallatin Range from Recommended Wilderness protection.

The Proposed Action also excludes roadless lands adjacent to Hyalite Peak. Please include the land stretching south along the Gallatin crest, from Hyalite Peak, as Recommended Wilderness.

#### Madison Range

I want to encourage the Forest Service to include a 15,676-acre addition to Cowboy's Heaven Recommended Wilderness to connect the two units.

This addition is consistent with the GFP's recommendations, with management of the adjacent Forest Service and Bureau of Land Management lands.

I agree with the Recommended Wilderness Area addition to the Taylor Hilgard unit of the Lee Metcalf. The 4,466-acre addition is also supported by the GFP. Please change the Recreational Opportunity Spectrum setting from semi-primitive motorized" to "primitive" in this area.

In the Lionhead, I support the 17,983 acres of Recommended Wilderness in the Lionhead, and encourage the Forest Service to restore the Lionhead Recommended Wilderness area from 17,983 acres to its current footprint of 22,800 acres. The Proposed Action excludes the Mile Creek area, which is the Custer Gallatin's only section of the Continental Divide Trail.

#### Sawtooth Inventoried Roadless Area

Please include the Sawtooth Inventoried Roadless Area as Recommended Wilderness. The 12,297 acres of Recommended Wilderness is also supported by the GFP and I encourage the FS to extend the boundaries of the Sawtooth IRA to include all roadless lands adjacent to Yellowstone National Park.

#### Crazy Mountains

Please include a desired condition that aims to protect the cultural values and wild characteristics of the Crazy Mountains. Including the religious and historic significance to the Crow Nation.

I encourage the Forest Service to protect the Crazy's wild, primitive characteristics and cultural significance by recommending it as Wilderness. In areas only open to foot and horse, please change the Recreational

Opportunity Spectrum setting from "semi-primitive non-motorized" to "primitive."

Providing public access should be a strong priority for the Forest Service.

#### Pryor Mountains

I support the CGNF's continued recommendation of Lost Water Canyon as a Recommended Wilderness area.

The Forest Service should strengthen protections for the Backcountry Areas by recommending these areas as Wilderness. In particular recommending the Lost Water Canyon (13,000 acres), Punch Bowl (8,500 acres), Big Pryor (12,000 acres) and Bear Canyon (10,000 acres) as Wilderness would sustain and support their tranquility.

I strongly believe the Forest Service should add a Desired Condition for a holistic management of the Pryor Mountains with your partners in NPS, BLM, and the tribe.

#### Cook and King Mountains & Tongue River Breaks

I agree with the Backcountry Area recommendations for Cook Mountain Backcountry Area (9,943 acres), King Mountain Backcountry Area (12,221 acres), Tongue River Breaks Backcountry Area (16,503 acres).

In all beliefs the Forest Service should change this special management to Recommended Wilderness.

#### Wild and Scenic Eligibility

I support the National Forest's Inventory of Wild and Scenic Rivers. However, please include the following list:

Bear Creek, Absaroka Mountains, ORVs (F,S)  
Beaver Creek, Madison Mountains, (R,S,W,F)  
Black Canyon Creek, Pryor Mountains, (F,G,W)  
Buck Creek, Madison Mountains, (F,W)  
Buffalo Creek, Absaroka Beartooth Mountains, (F,S,W)  
Cherry Creek, Madison Mountains, (F,G,S)  
East Boulder River, Absaroka Beartooth Mountains, (F)  
East Fork Mill Creek, Absaroka Beartooth Mountains, (F,S)  
Grayling Creek, West Yellowstone Basin, (F,W)  
Hellroaring Creek, Absaroka Beartooth Mountains, (F,R,S)  
Hellroaring Creek, Madison Mountains, (S,W)  
Hilgard/Sentinel Creek, Madison Mountains, (F)  
Hyalite Creek (Lower), Gallatin Mountains, (S,R)  
Lower Deer Creek, Absaroka Mountains, (F,S)  
Madison River (Bear Trap), Madison Mountains, (F,R,S,W)  
Porcupine Creek, Madison Mountains (F,R,S,W)  
Sixmile Creek, Absaroka Beartooth Mountains, (F)  
South Fork Madison River, Hebgen Basin, (F,S,W)  
Spanish Creek, Madison Mountains, (F,R,S,W)  
Sweetgrass Creek, Crazy Mountains, (R,S)  
Taylor Fork, Madison Mountains, (F,R,S,W)  
Teepee Creek, Gallatin Mountains, (F,W)  
Tom Miner Creek, Gallatin Mountains, (F,W)  
West Fork Mill Creek, Absaroka Beartooth Mountains, (F,S)

#### Absaroka-Beartooth Mountains

The proposed mines above Emigrant and Jardine in the Absaroka-Beartooth Mountains are a great concern. Please consider a proper watershed assessment with these mines that includes the effect on Yellowstone National Park.

#### Wildlife

The Forest Plan should implement and expand on the wildlife movement and connectivity program laid out in the Gallatin Travel Plan of 2006. Wildlife corridors should be recognized and designated to ensure the safety and tranquility of life in and around them.

The best way to limit conflict between humans and wildlife and mitigate human disturbance of wildlife habitat is to limit human travel to non-mechanized, that is, only foot traffic and stock traffic. Seasonal closures of sensitive wildlife habitat would also be beneficial.

Please reconsider fragmentation of the landscape. Primitive and semi primitive recreation still has an influence on wildlife movement. Creating new trails and roads will fragment the landscape more so. We should set management standards for keystone species first, i.e. Grizzly Bears, etc.

#### Recreational Opportunity Spectrum

The Recreational Opportunity Spectrum is geared toward motorized recreation. The Primitive Recreation segment is very similar to the Wilderness percentage of the forest. But outside of that, motorized use gets an overall 43% in summer and 46% in winter while nonmotorized only gets 23% in summer and 20% in winter. Please prioritize non-motorized recreation.

#### Benefits to People: Multiple Uses and Ecosystem Services

We are glad to see the Proposed Action recognize the Areas of Tribal Importance. These may be the most culturally significant sites on the Custer-Gallatin.

The entire forest has significance to Native Americans who have inhabited this area for at least 12,000 years.

I do not see any mention of the spiritual benefits that the Custer Gallatin National Forest offers to all people. The benefits of free access to natural landscapes cannot be overstated. They include stunning visuals of wild mountains, forests and rivers, free-roaming native wildlife, peace, quiet and solitude, and a place to test one's self outside of typical social and cultural situations.

#### Timber Production

Under "Proposed Action" (page 3) two of the first three bullet points refer to "timber production." This doesn't seem the best use of the Custer Gallatin National Forest, which lies in an area of harsh climate and steep, rugged topography that is generally unsuited for tree growing and associated harvest activities.

#### Timber Report

573,503 acres are identified as "suitable for timber production." "Desired Conditions" states that these lands will support a regularly scheduled timber harvest. The plan is to offer annual sales of 6 to 15 MMBF, scaling this down would ensure a longevity of forests and de-emphasize timber production.

Thinking commercial logging is an effective way to control fire is not helpful. Commercial logging aims at the best trees since their wood is valuable for lumber and yet these are some of the same trees that are most resistant to fire. Removal of these larger trees dries out the rest of the forest and opens it to more wind, proponents that increase the susceptibility of the forests to fires.

#### Prioritize Road Reclamation

The Roads and Trails Objective on page 71 of the Proposed Action states: "Annually remove 10 miles of planned unneeded system roads, based on available budgets." An action I support.

In the final Gallatin National Forest Travel Plan (2006), the Objectives for the Gallatin Roaded Travel Plan Area states: "OBJ. 3-2: Decommission and stabilize old logging roads in this Travel Planning Area not designated for recreation use or needed for forest management activities." This is appreciated and further it would be helpful to have a public map and a list of roads that have been deemed unnecessary and slated for decommissioning.

#### Species of Conservation Concern

The Proposed Action lists a very limited number of Species of Conservation Concern. The list shows 25 plants but only 3 animals, of which one is a mammal - the white-tailed prairie dog. Not one fish is listed as a species of

conservation concern. The struggling cutthroat trout populations on the Custer-Gallatin are deserving of this designation.

Grizzly bears, bison, moose, wolverine, bighorn sheep and lynx should all be added to the Species of Conservation Concern list as well.

#### Airstrips

There has been a push to open more access for "recreational aviation" in the creation of airstrips. I hope the Custer-Gallatin will not plan to build any (there are currently no airstrips on the forest). It's perfectly possible to fly over the forest from existing commercial airstrips in Bozeman, Ennis, Gardiner, West Yellowstone etc.

#### Climate change

The 2017 Montana Climate Assessment's showed average temperatures for Montana rose between 2 and 3 degrees F between 1950 and 2015. Temperatures are forecast to rise another 3 to 7 degrees F by mid-century. The report projects a decrease in annual average summer precipitation in the central and southern portions of Montana. Minimum (cold) temperatures are also expected to rise another 3 to 7 degrees by mid century. Snowfall and duration of snowpack are expected to decrease in lower and mid elevations, meaning less water in rivers and streams by late summer.

Climate change is going to continue to have a major impact on the Custer-Gallatin. Wildlife will be heavily impacted and the higher elevation, relatively cold regions will be essential for the survival of cold-dependent species like lynx, wolverine, and moose. Travel and dispersal corridors must be maintained to allow regional species to migrate north and to allow more southerly species and populations that migrate to the Custer-Gallatin.

#### Whitebark Pine (*Pinus albicaulis*) and Climate Change

Whitebark pine is threatened throughout its range by the introduced disease blister rust and mountain pine beetle attack. Recent research has shown that the CGNF holds whitebark pine refugia that is critical for the species to survive climate change. Protection of these refugia are paramount for maintenance of the species and persistence of healthy populations of grizzly bears, Clark's nutcrackers, and other small mammals.

#### Further Comments

I support the Gallatin Forest Partnership as one of the alternatives for the EIS process. This community based solution is a great way to move forward with our forests. Another alternative would be a maximum Wilderness alternative, including every suitable location for wilderness recommendation.

These spaces hold our communities together by providing a place for folks to connect and for wildlife to thrive. Without continuous planning and reassessment of plans for our public lands their ability to thrive within our ever changing world could be minimized. As someone who frequents these spaces often to hike, climb, run, and snowboard it is important to me that we look into the future to ensure their healthy survival.

Thank you for this opportunity to comment on the Proposed Action for the Custer-Gallatin Forest Plan Revision. I am excited to continue to be apart of the future planning of our forests.

Cheers,

Eli Tianse Abeles-Allison