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Comments: Greetings Forest Plan Team,

I appreciate the opportunity to comment on the CGNF Forest Plan revision. Having been personally involved in a number of NEPA processes, I know that it is a daunting task to assemble all of the requisite data and analyses to undertake this revision. Add to that the task of reviewing and interpreting all of the public comments, and it's no wonder that this is a multi-year process. Your diligence is appreciated by all Forest users, whether we concur with the outcome or not.

As a long-term Bozeman resident, a professional wildlife biologist and an avid backcountry recreationist, I have watched this Plan revision process unfold with considerable interest. While I have some thoughts and observations on many of the areas treated in the Draft Plan and DEIS, I will focus my comments specifically on the HPBH WSA.

I have spent a great deal of time on the Gallatin Crest, having explored the entire length of it from Hyalite to the Park boundary. My fondest memories of the Crest are the many trips I have taken up there over the last 30+ years with my kids, both backpacking and staying at the Windy Pass cabin -- an annual tradition from the time each child was old enough to pull it off. As the kids grew, we have fanned out to cover more and more terrain, usually covering 25-30 miles in a multiday outing and bagging whatever peaks, bumps or other destinations beckoned. We're heading up again in 10 days.

As many others have pointed out in public meetings and submitted comments, the Crest is a unique and special place not only in terms of its topography, its scenery, its importance to wildlife, and other natural resources, but also for its accessibility (16 trailheads!) and proximity to a region with an ever increasing thirst for wilderness experiences. The demographics of Gallatin and Park Counties are clearly changing, with many of the new arrivals eager for backcountry and wilderness opportunities. This is most obvious on the lower trails in and around Bozeman - the increase in numbers of hikers and runners seen on the most popular local trails (Sypes Canyon, the M, Hyalite area, Blackmore, Bear Canyon, Lava Lake, etc.) in the last 40 years is genuinely startling. As many of these front-country trails become saturated, the demand for additional, more dispersed non-motorized recreation is sure to grow.

It is noteworthy that earlier projections about what would occur in Gallatin and Park Counties have notoriously underestimated just how much the population would swell. At this juncture, it's safe to say that a) the growth will not slow down in the foreseeable future and b) the desire for bonafide non-motorized wilderness experiences will undergo a commensurate increase. The Crest provides an unparalleled setting to accommodate that growing demand.

The importance of the HPBH area for both resident and migrating wildlife is well documented. I believe that the study completed by the Craighead Institute did an admirable job of outlining the importance of this area for long-range connectivity for wildlife movements. The abundance and diversity of wildlife I have observed on the Crest on my many trips is remarkable. I do not believe that the disturbance associated with wheeled recreation is compatible with the primary values of the area for wildlife and for non-motorized, low intensity recreation.

Once while camped in the Windy Pass/Sentinel area I observed (initially only heard) motorcycles "poaching" the Crest. It was remarkable how far away the whine of the machines could be heard - literally miles away and for over an hour in duration. The serenity and ambience of the area was wholly transformed. (Note that this is coming from someone who grew up riding dirt bikes and later street bikes and still loves them). The degradation

and wildlife disturbance that would accompany the introduction of wheeled recreation further into the current WSA is hard for me to contemplate. The research has long been clear on the multifarious impacts of roads and the accompanying disturbance on wildlife populations. The Elk Vulnerability Symposium held in Bozeman way back in 1991 comes to mind, as that conference and the published proceedings included many studies examining the impacts of roads on ungulate populations. A lot more work has been done since those early studies to reinforce the salient conclusions.

If I may wax philosophical for a moment... I do not find the customary arguments against additional wilderness designation to be particularly persuasive. Decreased access? - I'm in my mid-60s and I can knock out 25+ miles with lots of elevation gain in a day. I'm fortunate to still be able to do that, but when I no longer can, I shall be happy to cede the wilderness to those still able (including my children), knowing that they will revel in the same inspiring landscapes I once did. Too much wilderness? Well, that depends on your perspective and the time frame you choose to arrive at that conclusion. In my estimation, we have relinquished far too much of what was once western wilderness to development, roads, and other human emplacements. Hence the needle marking the position where compromise now begins has already swung far off center prior to negotiation. If anything, we should be trying to nudge that needle back the other way by restoring degraded landscapes, reclaiming roads, and, where necessary, imposing additional restrictions on human activities so that other species might prosper. This is especially true given the uncertainties accompanying the changing climate and the effect those changes will have on the capacity of current natural areas to sustain healthy wildlife populations.

I have reviewed the alternatives outlined in the draft plan and DEIS, along with GFP's proposals for the Plan revision. I concluded that Alternative C, which accords most closely with the GFP recommendations falls short as far as the HPBH WSA is concerned and would prefer that the provisions outlined in Alternative D apply to the HPBH area. As noted in the DEIS (p. 740), it is significant that "The checkerboard ownership pattern was largely responsible for the conclusion that the area was unsuitable for wilderness designation. Since then, nearly 37,000 acres of private land have been acquired as national forest within the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area boundary." In other words, had the checkerboard pattern, which has now been substantially reduced, not been present when the area was evaluated in the early 1980s, it is likely that wilderness designation would have been recommended. The current forest plan revision is an opportunity (in all likelihood, the last opportunity) for that omission to be rectified. However, I recognize that closing 19 miles of the existing WSA to bicycle travel and closing 36 miles to motorcycles would render Alternative D unpalatable to those user groups, inevitably leading to protracted litigation. In that context, I can reluctantly accept Alternative C as a necessary middle ground.

Finally, I concur with GYC's recommendations regarding the important role of the Madison Range for wildlife connectivity, along with the critical importance of anticipating, monitoring and planning for climate change alterations as it affects vegetation, fire behavior, wildlife distribution and movements. At this juncture, we can only speculate (albeit fortified by the best available science) as to the magnitude and scope of the changes that will occur over the next several decades. Nonetheless, it is incumbent on the Forest Service to steer clear of resource management policies that derive their verisimilitude from an overly optimistic assessment as the degree of landscape-level changes that may occur within the CGNF.

Thank you for your efforts,

Albert Harting, PhD