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Organization:

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Comments: I object to the Custer Gallatin National Forest Plan for the following reason:

The Forest Service is creating wilderness without the consent of Congress. The Custer Gallatin National Forest Draft Record of Decision (CGNFDRD) states on page 26 and additional pages:" I have decided to include a plan component that motorized and mechanized transport is not suitable in recommended wilderness." This is an arbitrary decision which circumvents Congress and their sole authority to designate wilderness. Although the plan states the Forest Plan will not make site specific decisions on specific motorized and mechanized use, the decision to remove motorized and mechanized use in areas recommended as wilderness in future planning actions is in fact a site-specific decision being made in the Forest Plan on where motorized and mechanized use is allowed.

Whether an intentional play on words or simply a bait and switch, the Forest Plan is in fact making site specific decisions which WILL be implemented in future travel planning decisions. During the tenure of Region 1 Forest Supervisor Tidwell a white paper was created by Tom Puchlerz which stated the philosophy of Recommended Wilderness Area management. This philosophy paper implemented an action to remove all historic motorized and mechanized use in areas the Forest Service proposed as recommended wilderness. This philosophy, which was never stated as policy, has been challenged over the years by groups like Citizens for Balanced Use and others. The argument that the Forest Service is creating wilderness without congressional designation has great merit.

Recent letters from the Forest Service Chief Christiansen dated August 6, 2019 to several of the Idaho congressional delegation along with a letter dated April 23, 2019 from current Region 1 Forest Supervision Leanne Marten state: "All prior (RWA) direction has been superseded". This indicates the philosophy initiated and actions taken to remove motorized and mechanized use in areas recommended as wilderness in past decisions by Region 1 has changed both nationally and in Region 1 but the Custer Gallatin National Forest Supervisor Mary Erickson is not recognizing this change. We request the Custer Gallatin Forest Supervisor recognize the recent change in management direction of recommended wilderness and allow existing and current historic use to continue. Thank You