

Data Submitted (UTC 11): 8/28/2020 8:31:26 PM

First name: Nancy

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Organization:

Title:

Comments: Greetings,

I would like to thank the Forest Service for all of the work that has gone into the Forest Plan. I was especially excited to see that the Forest Plan includes the following:

-Recommended wilderness in the Crazy Mountains and recognition of the area as important to the Crow Tribe.

-Expansion of recommended wilderness in Lost Water Canyon and the addition of Bear Canyon in the Pryor Mountains.

-Maintaining the primitive character and management of the roadless areas in the Ashland Ranger District (Tongue River Breaks, King Mountain, and Cook Mountain).

-Ensuring recommended wilderness will be managed without non-conforming uses.

-Incorporating many elements of the Gallatin Forest Partnership, including recommended wilderness for the Gallatin Range.

Statement of issues and/or parts of the plan revision to which the objection applies:

My objections apply to the following issues in the Custer Gallatin Land Management Plan:

Cowboy Heaven (MG-CHBCA)

Crazy Mountains Backcountry Area (BC-CMBCA)

South Crazy Mountain Recommended Wilderness

Chalk Buttes Backcountry Area (SX-CBBCA)

Pryor Mountains BCAs

Elimination of recommended Wilderness, including Lionhead

Hyalite area (MG-HREA)

Concise statements explaining the objection and suggestions on how the proposed plan should be improved:

Cowboy Heaven (MG-CHBCA):

I strongly object to Cowboy Heaven not being recommended for Wilderness. Cowboy Heaven connects the Spanish Peaks and Bear Trap Canyon units of the Lee Metcalf Wilderness. It's also adjacent to Recommended Wilderness in the Beaverhead-Deerlodge National Forest directly to the west. The Forest Service left this area out of the 1983 Lee Metcalf Wilderness legislation, but it remains wild and untrammeled. By recommending Cowboy Heaven for Wilderness, the Forest Service would be recommending consistent management and consolidating a wild corridor for wildlife away from the busy Gallatin Canyon and Gallatin Valley. Protecting Cowboy Heaven was also at the heart of the Gallatin Forest Partnership Agreement, which was endorsed by over 900 individuals and 100 organizations and businesses, including the Park, Gallatin, and Madison County Commissions. Alt F replaces the Partnership's recommendation for Wilderness in Cowboy Heaven with a Backcountry Area allocation (BCA), ostensibly to accommodate mountain bike access. However, the Southwest Montana Mountain Bike Association, Livingston Bike Club, and Big Sky Mountain Bike Alliance all helped develop the Partnership's agreement, which provides mountain bike access along the edge of Cowboy Heaven but calls for Wilderness designation for its core. Not recommending Cowboy Heaven for Wilderness is not a logical management outcome, and I encourage the Forest Service to reconsider.

Crazy Mountains

The stunning Crazy Mountains have been historically, culturally, and spiritually significant to the Apsáalooke (Crow Nation) since time immemorial. This island range's alpine and riparian ecosystems also provide crucial habitat for pikas, wolverines, and other species that are dwindling as a result of climate change. Montana Fish, Wildlife & Parks also considers the Crazies essential to the future survival of mountain goats. As our climate warms, it's becoming imperative that we protect high-elevation refuges like the Crazies. While there is no existing mountain bike access in the area, the proposed BCA would be open to mountain biking, so it seems the Forest Service is leaving the door open to expand bike access. The east side of the Crazies should stay primitive and open to foot and stock only, as they currently are. Allowing bikes will change the character of these unique alpine ecosystems and invite conflict. Accordingly, the Forest Service should amend the BCA to be both non-motorized and non-mechanized.

Please include a suitability component similar to the Bad Canyon backcountry area: "The backcountry area is not suitable for mechanized transport, except use of game carts."

I would also like to see the Crazies BCA expanded east to include sections 4, 22, 26, and 34. If the proposed East Crazy Mountains land swap goes through, this will be a contiguous area and should be managed consistently with the adjacent backcountry area.

I was extremely pleased to see the Crazies receive some recommended wilderness protection. While I wish it was much bigger, I understand that there are many interests Supervisor Erickson is balancing. However, I ask that the South Crazy Mountains recommended wilderness be expanded east. That would help to make a larger contiguous recommended wilderness area.

Chalk Buttes

The Chalk Buttes are another important place where I would like to see improved language in the backcountry area plan components. The Chalk Buttes rise abruptly and dramatically from the surrounding prairie. Here, you can find canyons, draws, and meadows full of wildflowers, mosses, ferns, rare rice grasses, and one of the only stands of birch trees this far west. They're sacred to many Indigenous peoples, particularly to bands of the Great Sioux Nation and the Northern Cheyenne Tribe. The Chalk Buttes also provide sanctuary for many animal species, including mule deer, mountain lions, black bears, and some of the biggest trophy elk in the state. There are unique hiking opportunities throughout the Buttes. These ecosystems and quiet recreation opportunities deserve to be protected.

The backcountry area designation is not sufficient. The access road would remain open to motorized vehicles, while the full BCA would be opened to mountain biking. The Chalk Buttes currently have no designated trails, and the topography makes mountain biking nearly impossible. Instead of opening the door to a use that does not and will not exist in the area, the Forest Service should instead update the BCA designation to protect existing primitive recreation and wildlife.

The Backcountry area should include the following suitability component in order to protect the current wild character of the area: "The backcountry area is not suitable for mechanized transport, except use of game carts."

Pryor Mountains

While I appreciate that recommended wilderness was expanded in Alternative F, I would like to see Punch Bowl and Big Pryor also recommended for wilderness. Like the Crazies, the Pryors are sacred to the Apsáalooke. Three distinct ecoregions converge here: the Middle Rockies, Wyoming Basin, and Northern Great Plains. This confluence has created a biodiversity hotspot, where many plants and animals found nowhere else in Montana

(and even the world) thrive, often at the northernmost reaches of their range Expanding the Lost Water Canyon Recommended Wilderness area to include more of Crooked Creek, and recommending Bear Canyon for Wilderness designation is a noteworthy achievement for the many people who have advocated for this unique range over the years. However, not recommending Big Pryor and Punch Bowl for Wilderness, and instead designating them as BCAs open to mechanized and motorized use is a missed opportunity to protect four distinct areas of the Pryors, each with their own characteristics and values. For these reasons, I request that the Big Pryor and Punch Bowl areas be recommended for wilderness in the final plan.

Elimination of Recommended Wilderness

I was extremely disappointed that the Forest Service decided to eliminate 26,135 acres that had been previously recommended in the 1986 and 1987 plans respectively. I am particularly disappointed to see that the Lionhead recommended wilderness has been eliminated. The previous Custer and Gallatin forest plans, written before the forests were combined, recommended only six Wilderness areas across the two forests, with a combined acreage of 33,741 acres. Although the new plan recommends some new Wilderness, it proposes eliminating five of the six recommended Wilderness areas from the previous plans, including the 20,774-acre Lionhead area.

The Lionhead adjoins the Targhee Creek Recommended Wilderness in Idaho along the Continental Divide. The area protects an important wildlife linkage between Yellowstone National Park and the Centennial Mountains and provides secure habitat for elk, bighorn sheep, wolverines, and grizzly bears. It also offers a stunning backcountry experience and encompasses the only section of the Continental Divide Trail within the Custer Gallatin National Forest. The Forest Service has allowed mountain biking to become established here, and though it states the wilderness character has not changed, it points to this recreational conflict as the reason it is no longer suitable for Recommended Wilderness. The Forest Service should retain these existing areas of Recommended Wilderness since the conditions have not changed to make them ineligible for Wilderness. It must not allow Recommended Wilderness protections to be eroded by laissez-faire management.

Please consider reincorporating the Lionhead, Burnt Mountain, Republic, Mystic, and Line Creek Plateau as recommended wilderness in the new plan. It is important that we continue to protect these areas as recommended wilderness because the wilderness character has not changed there since they were recommended in the old plans.

Hyalite Canyon

I encourage the Forest Service to fully implement the Gallatin Forest Partnership agreement, including key elements of the agreement that would protect Hyalite. Currently the plan doesn't offer any protection for the South Cottonwood Area or Mount Blackmore. The Hyalite watershed is a popular recreation destination in all seasons and provides the majority of Bozeman's municipal water supply. The South Cottonwood trail, characterized by old-growth forest, lush riparian areas, and meadows, is popular with hikers, mountain bikers, and trail runners and connects with Hyalite Canyon. It also connects with Mt. Blackmore, a popular area for backcountry recreation and an iconic Bozeman landmark. The final forest plan cuts the GFP's recommended protections for Hyalite in half, notably leaving out both South Cottonwood and Mt. Blackmore. This leaves the area vulnerable to logging, temporary road building, and increased recreational development. The Forest Service should include the GFP's proposed protections for this area and protect its important wildlife habitat and backcountry recreation opportunities.

In addition, I would like to see the Hyalite Recreation Emphasis area include the standard that was in Alternative C in the DEIS: "Construction of new motorized trails shall not be allowed." It is very important that we ensure that the motorized footprint does not continue to expand because of the impact it has on the opportunity for high quality recreation for other users. There is plenty of motorized opportunity in Hyalite as is. Please include this important standard to ensure that Hyalite continues to be a place where users of all types can have high quality recreation experiences.

Statement demonstrating the link between objection and prior formal comments:

I submitted a comment on the draft plan and draft EIS last spring. While I appreciate that many things I supported are included in the final plan, my objections speak to those priorities from my prior comments that were not included. Thank you for considering these objections that I believe could significantly improve the final plan.