

Data Submitted (UTC 11): 8/31/2020 8:45:20 PM

First name: Patrick

Last name: Cross

Organization: Vulpes Ecological, LLC

Title:

Comments: August 31, 2020

Objection Reviewing Officer

USDA Forest Service, Northern Region

Building 26

Fort Missoula Road

Missoula, MT 59804

Submitted electronically to: [appeals-northern-regional-office@fs.fed.us](mailto:appeals-northern-regional-office@fs.fed.us)

Re: Custer Gallatin Forest Plan Draft ROD Objection

To whom it may concern,

Objector Patrick Cross files this objection to the Custer Gallatin Forest Plan revision Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS), noticed May 21, 2020. Mary Erickson, Custer Gallatin National Forest Supervisor, Responsible Official.

I (Patrick Cross) previously filed a comment on the Proposed Action and Draft Environmental Impact Statement (Draft EIS) for this Forest Plan revision on May 14, 2019, in which I supported the recommended Wilderness protections contained in Alternative C. Yet several of these recommendations affecting (a) the area west of the Line Creek Plateau, and (b) the area around Mount Republic including the Irma Mine Road, were not included in the final Forest Plan, to which I object.

Alternative C recommended enlarging the small island of existing Absaroka-Beartooth Wilderness west of the Line Creek Plateau to include more of the north-northwest facing slope of the Rock Creek Valley between Chain Creek and Wyoming Creek. Popularly known as "Rock Creek Headwall", this is the premier spring backcountry skiing area along the Beartooth Highway. Not only have I enjoyed skiing Rock Creek Headwall myself for the past 20 years, I've also enjoyed watching skiers there for as long as I can remember (growing up in Billings, my family always stopped to marvel at the skiers while driving the Beartooth Highway each year). This is an important resource for many people, skiers and spectators alike - indeed, a couple years ago, a woman with Minnesota license plates pulled up to my friends and I at the parking area below the Headwall and insisted on giving us a ride back to the top of the Plateau so that we could ski down while her relatives watched. We happily obliged.

But in recent years, I have seen an increasing number of snowmobiles being used in the popular backcountry skiing areas along the Beartooth Highway, which are causing negative detrimental impacts to recreational, aesthetic, and natural resources. In doing so, a relative handful of snowmobilers are diminishing the quality of experience for a much greater number of skiers and other highway users. Specifically, snowmobiles:

(a) Create deep ruts in the snow surface that, after freezing solid the night after they were made, can persist for the remainder of the season and render the slope virtually unskiable.

(b) Are very loud, especially when they echo off the surrounding granite walls, making for an unpleasant experience for others, whether they be skiers or just people out to enjoy the scenery.

(c) Consume more than twice as much parking space compared to other users, as big trucks and trailers are needed to bring the snowmobiles there, thus increasing traffic congestion and taking away opportunities for others to stop and get outside their cars.

(d) Damage sensitive alpine vegetation, as the snowpack is patchy during the spring season and snowmobilers will frequently cross snow-free areas to go wherever they want to go.

(e) Are already being used to illegally cross the designated Wilderness area between the Rock Creek Headwall and the stateline parking area, as I have witnessed (and reported to Forest Law Enforcement) in recent years.

Without non-motorized protection, I am afraid that Rock Creek Headwall will soon go the way of nearby Gardiner Headwall (on the Shoshone National Forest). Just a few years ago, Gardiner Headwall could support dozens of skiers on any given day in late May or June, while as many or more spectators could watch from a large and well-situated parking area. But today, you might see half a dozen snowmobilers highmarking the slopes, with no skiers (due to the impact on the snow quality as well as safety concerns) and no spectators (due to the noise) sharing the area. In fact, given the growing number of snowmobiles coming to the Beartooth Highway and the increasing power and performance of modern snowmobiles, I am surprised people are not highmarking Rock Creek Headwall already. As soon as one person does and posts a picture on Instagram, it's all over. Non-motorized protections for this area are therefore essential to maintain this important recreational and cultural resource, so I object to the decision to reject Alternative C's proposed non-motorized restrictions for this area, and strongly recommend that the final Forest Plan permanently prohibit off-road motorized use in the Rock Creek Headwall area by expanding the existing Wilderness area.

I likewise object to excluding the area around Mount Republic from the snowmobile restrictions proposed in Alternative C.

This area, specifically the Irma Mine Road, has been a popular cross country skiing route for Cooke City residents for many years (as I know from having lived in Cooke City for several winters between 2008 and 2014). The Irma Mine Road is the only suitable site for a cross country ski trail like this in the area because it:

(a) has a mellow grade (and is therefore suitable for skiers of all abilities),

(b) is not an access route for popular snowmobile areas (unlike all the other roads surrounding Cooke City), and

(c) is one of the only cross country ski routes in the area where dogs are allowed (unlike the trails in Yellowstone National Park).

But in recent years, like on the Beartooth Plateau, the Irma Mine Road has seen more snowmobile traffic. Also like on the Beartooth Plateau, this new traffic is typically not from traditional snowmobilers, but from the growing number of backcountry skiers who use powerful mountain sleds to shortcut access. The snowmobiles obliterate the ski tracks and replace them with washboard, thus diminishing the quality of this quiet recreation experience. I recently spoke to one of these snowmobilers using the Irma Mine Road for ski access, questioning the necessity of using the high-impact machine to shortcut barely a mile off the approach to backcountry skiing in the Northern Absaroka Wilderness just past the Irma Mine. He responded that if he could get one more ski lap in because of it, then it was worth the impact to others. I disagree with this, and believe that the Forest should be managed for a diversity of opportunities that the greatest number of users can sustainably enjoy. I therefore object to the decision to reject Alternative C's proposed non-motorized restrictions for this area, and strongly recommend that the final Forest Plan permanently prohibit motorized over-snow vehicle use in the Mount Republic area including the Irma Mine Road.

In conclusion, I am happy to see that the Forest has included most of Alternative C in its final Forest Plan, but I

object to its decision to reject Alternative C's proposed motorized restrictions for the Rock Creek Headwall and Mount Republic areas, and recommend that it restore those restrictions as described in Alternative C to the final Forest Plan. In fact, I recommend that the Forest adopt Alternative C in its entirety. Given the increasing number of Forest users, the increasing number of "toys" those users are bringing to the Forest, and the increasing impact those users and their toys are having on the Forest, it is now more important than ever to establish protections that will conserve the Forest and its widest range of benefits for years to come.

Thank you,

Patrick Cross