

Data Submitted (UTC 11): 9/3/2020 4:23:36 AM

First name: Patricia

Last name: Steinmuller

Organization:

Title:

Comments: Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

X Land Management Plan

?Regional Forester's List of SCC

1. Statement of issues and/or parts of the plan revision to which the objection applies: Cowboy Heaven: Although the final plan recommends the Cowboy Heaven acreage as a backcountry area designation, the plan fails to recommend Cowboy Heaven for Wilderness designation. Additionally, no provisions or recommendations are made to protect wildlife habitat, wildlife connectivity, and the wild character of Cowboy Heaven.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: I have hiked in Cowboy Heaven over the years and recognize its wilderness character and abundance of wildlife habitat. The proximity to and commonalities of Cowboy Heaven to the northern portion of the Lee Metcalf Wilderness Area and the recommended Wilderness unit on the Beaverhead Deerlodge National to the west makes Cowboy Heaven a worthy addition for Wilderness recommendation. Wildlife habitat and connectivity would be benefited from inclusion of Cowboy Heaven as recommended Wilderness.

*Proposed Solution: Recommend Wilderness designation for Cowboy Heaven as stated in the Gallatin Forest Partnership Agreement (GFP) (<http://gallatinpartners.org/>). A small boundary area adjustment would eliminate the Cowboy Heaven administrative cabin from a recommended Wilderness designation from the remainder of the Cowboy Heaven. A Wilderness recommendation would benefit wildlife habitat, connectivity for wildlife movement, and wild character of the area.

Statement demonstrating the link between objection and prior formal comments: In my earlier comments I supported the recommendation of the GFP Agreement for Cowboy Heaven to be recommended for Wilderness designation. Making this addition would connect the Spanish Peaks and Bear Trap Canyon units of the Lee Metcalf Wilderness. Additionally, Cowboy Heaven adjoins a recommended wilderness unit on the Beaverhead Deerlodge National Forest immediately to the west. Making these revisions to recommended Wilderness would benefit wildlife, wildlife habitat and corridors, and help maintain wilderness character.

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

Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA): Although I appreciate the over 77,000 areas designated as recommended Wilderness in the final plan, the plan omits the full amount of acreage recommended by the GPP.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: The entire HPBH WSA deserves the highest level of protection for wilderness character, wildlife habitat, and wildlife corridors.

*Proposed Solution: I suggest a revision be made to include the entire HPBH WSA as recommended Wilderness designation. Additionally, I recommend adding the historic Windy Pass Cabin within the recommended Wilderness designation. Although this is a rental cabin, there are similar exceptions in other area recommended

for wilderness and I suggest including this historic cabin as an exception since the cabin is used by individuals on a temporary basis.

Statement demonstrating the link between objection and prior formal comments: In my earlier comments I supported the entire HPBF WSA for Wilderness designation as stated in the GFP. Also, I stated that I have hiked to the Windy Pass cabin many times and have rented it for an overnight stay. Being miles away from roads and deep into this wild area was a special experience.

3.Statement of issues and/or parts of the plan revision to which the objection applies: South Cottonwood and Mt. Blackmore omission from the Hyalite Recreation and Watershed Protection Area.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: Differing from the recommendations of the GFP, the final plan omits South Cottonwood Trail and Mt. Blackmore. Locally termed a pocket wilderness, the South Cottonwood Trail is characterized old-growth forest, clear, cold meandering Cottonwood Creek, riparian areas, scenic meadows, and access to Mt. Blackmore providing a connection to Hyalite Canyon. Popular with hikers, mountain bikers, trail runners, birders, and other non-motorized recreationalists, South Cottonwood deserves a management plan to protect its recreational, scenic, and wildlife values. Omitting South Cottonwood from the Hyalite Recreation and Watershed Protection area increases the potential for road building, logging, and increased recreational development.

*Proposed Solution: Restore the protections proposed by the GFP for Hyalite Canyon area and including Mt. Blackmore and South Cottonwood.

Statement demonstrating the link between objection and prior formal comments:

In my prior comments I recognized recreation as a priority of Hyalite Canyon, including South Cottonwood and Mt. Blackmore, while recommending that the area be managed to protect its wild character, wildlife habitat, and wildlife connectivity.

4.Statement of issues and/or parts of the plan revision to which the objection applies: Lionhead. The final plan eliminated the previous recommended Wilderness designation.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: The final plan changed the >20,000 acres in Lionhead from recommended Wilderness designation to a 27,000-acre backcountry area despite the continued existing wilderness character of this landscape. Additionally, no protections for wild character or wildlife habitat are provided. The current mountain biking use in the Lionhead is the direct result of the forest service historically allowing non-conforming uses in this recommended Wilderness area.

*Proposed Solution: I recommend that all the previous recommended Wilderness acreage in the Lionhead continue with a recommended Wilderness designation.

Statement demonstrating the link between objection and prior formal comments: I made this statement of support for retaining recommended Wilderness designation for the Lionhead in my earlier comments.

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

Pryors. While the plan recommends expanding the Lost Water Canyon Recommended Wilderness area and recommends Bear Canyon for Wilderness designation, I am disappointed that the forest service has not recommended Big Pryor Mountain and the Punch Bowl for Wilderness designation.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: Characterization of the Big Pryor Mountain and the Punch Bowl as Backcountry Areas is concerning because this term is not defined, and the Desired Condition could be better met by recommendation as Wilderness.

Consistency in management among the FS, Bureau of Land Management (BLM), and the Bighorn Canyon National Recreation Area (BCNRA) is logical and critical for maintaining the ecological health and uniqueness and biodiversity of the landscape. For example, migrating animals show no concern for transitions in boundaries or landscape management. Thus, consistent management should ideally exist across boundaries between the FS, BLM, and BCNRA. The fact that the BLM and BCNRA have identified nearly half of the land they manage as Wilderness, provides another rationale for designating Big Pryor Mountain and the Punch Bowl as recommended Wilderness.

*Proposed Solution: Replace the Backcountry area designation for Big Pryor Mountain and the Punch Bowl with recommended Wilderness designation for these two distinct geographic areas. A designation of Wilderness would be the best way to preserve the ecosystem, ecological diversity, wildlife habitat and wildlife corridors, and protect the biodiversity within and endemic flora that is unique to the Pryor Mountains.

Statement demonstrating the link between objection and prior formal comments:

In my earlier comments, I supported the recommendations of the Pryors Coalition (<http://www.pryormountains.org/>) for the Pryor Mountains, of special importance to the Crow Tribe. Each of these areas four areas of the Pryors: Bear Canyon, Lost Water Canyon, Big Pryor Mountain and the Punch Bowl, is distinctly different while containing wilderness characteristics, developments that are substantially unnoticeable, and opportunities for solitude and for primitive recreation.

Since the ecological diversity of flora and fauna of the Pryors is unique, the Pryors deserve specific management directives that align with the ecology of the area. For example, several species of plants occur only in the Pryors and nowhere else in the world. To maintain the diversity and integrity of these unique communities requires management directives that match the characteristics of the ecological systems of the area. Since the 2012 Forest Service Planning Regulations require that the diversity and ecological integrity be maintained, a recommended Wilderness designation would be the best management option for Big Pryor Mountain and the Punch Bowl.

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

Southeastern primitive area of the Crazy Mountains. The Backcountry Area Allocation would allow mountain biking in an area where no mountain biking access currently exists.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

*The reasons for this objection are: The southeastern side of the Crazy Mountains is currently managed as primitive and open to foot and stock only. This is a very rugged area that is best managed to retain its primitive qualities and its cultural significance to the Crow Nation.

*Proposed Solution: Amend the Backcountry Area Allocation for the southeastern portion of the Crazy Mountains to be non-mechanized as well as non-motorized.

Statement demonstrating the link between objection and prior formal comments:

Due to the wild character and rugged terrain, I recommend managing the Crazies as recommended Wilderness and acknowledge the landscape for its cultural significance. I recommend allowing only foot and horse travel as an application of a "primitive" Recreational Opportunity Spectrum (ROS).