

Data Submitted (UTC 11): 9/4/2020 1:42:34 AM

First name: Kathleen

Last name: Corby

Organization:

Title:

Comments: 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). 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. 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. Not recommending Cowboy Heaven for Wilderness is not a logical management outcome. Please incorporate this important element of the Gallatin Forest Partnership Agreement by recommending Cowboy Heaven for

wilderness in the final plan.

#### Crazy Mountains:

The stunning Crazy Mountains have been historically, culturally, and spiritually significant to the Apsaalooke (Crow Nation) since time immemorial. This island ranges 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, its becoming imperative that we protect high-elevation refuges like the Crazies. The proposed Backcountry Area should be modified to prohibit mechanized use. There are no existing mountain bike trails in this area and leaving the door open for the trails to become designated down the road only invites conflict where there doesnt need to be any. I am sure the Crow Nation would not approve of mountain biking within this area. 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. I feel very strongly that the area should 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. Wilderness should remain wild. The Chalk Buttes are sacred to many Indigenous peoples, particularly to bands of the Great Sioux Nation and the Northern Cheyenne Tribe. Respect this.

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.

The Forest Service should update the BCA designation to protect existing primitive recreation and wildlife. Let's just enjoy the beauty of the canyons, draws, and meadows full of wildflowers, mosses, ferns, rare rice grasses, and one of the only stands of birch trees this far west. Similar to the Crazy Mountains, there are no existing designated mountain bike trails here. 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 Apsaalooke. Respect this.

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.

Not including Big Pryor and Punch Bowl for Wilderness, 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. I encourage the Forest Service to recommend wilderness designation for both areas in the final plan. 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 key to everything is connectivity!

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.

Wilderness has no place for recreational mountain biking. This activity disturbs wildlife. 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.

So, clearly you must retain these existing areas of Recommended Wilderness since the conditions have not changed to make them ineligible for Wilderness. You must not allow Recommended Wilderness protections to be eroded by laissez-faire management.

Keep wilderness WILD!. 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:

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 South Cottonwood trail is beautiful because of the old-growth forest, lush riparian areas, and meadows. But again, it comes down to connectivity. Your plan cuts the GFPs 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 GFPs proposed protections for this area and protect its important wildlife habitat and backcountry recreation opportunities. It is important that these areas receive protection as the Gallatin Forest Partnership recommends.

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.

Originally Apsaalooke (Crow) territory, the jagged island range has held immense spiritual significance to the tribe for centuries. This is their sacred land. I personally believe in "Land Back", but for now I'll just say respect the Indigenous People because we all live on Indigenous land. Respect it. Leave it wild. We all benefit from this choice.

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.