Data Submitted (UTC 11): 9/5/2020 11:21:16 PM First name: Andrew Last name: Franks 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). 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. This (Cowboy Heaven) is one of a precious few areas of true Wilderness located strategically between two, key Wilderness areas. As such, Cowboy Heaven offers the rare chance to unite significant, yet currently separate areas of wilderness. Please do not pass up this rare opportunity. It is the right thing to do. It is the best thing to do for Montana... for the Last, Best Place. Please do the right thing.

Thank you. Please incorporate this important element of the Gallatin Forest Partnership Agreement by recommending Cowboy Heaven for wilderness in the final plan.

## Crazy Mountains:

The Crazy Mountains represent some of the most pristine, iconically "Big Sky" territory we know. These mountains hold meaning as the stage on which Montana history has played out, both in modern times as well as in the millenia during which our Native American brethren traversed the range. Indeed, these mountains have held and continue to hold essential social, cultural, and religious significance for these Peoples. For these reasons, the Crazy Mountains must be preserved as Wilderness. 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. The East side of the Crazy Mountains must be kept free of mountain-bike use. Not only would such use cause rapid trail deterioration and increase maintenance costs, but also such use would be seriously disrespectful of Native American spiritual, religious, community, and sociocultural mores. 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. The Chalk Buttes near Ekalaka, trailless as they are, should not be subjected to the kind of abuse that is the ineluctable consequence of mountain-bike use. Even where trails exist, mountain bikers persistently generate impromptu trails through many areas that should have remained undisturbed. These "vampire" trails are created in eco-sensitive areas prone to erosion and almost invariably follow the fall line up and down hillsides.

Further, these trails, laid out without rhyme or reason, create a tangled mess of interconnected trails that are a danger to all but the most expert backwoodsmen.

For these reasons alone, the Chalk Buttes near Ekalaka are not suitable for mountain-bike use. 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. The Pryors should be sustained as holistic Wilderness. These areas in many cases hold exemplary instances of unusual, natural beauty, as well as ecologically important environments. It is important to protect as much of the Pryors as possible in order to sustain the power of these united areas---the whole is greater than the sum of its parts. 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. Montanans know---we all know---that Recommended Wilderness areas play a vital part in the ongoing process of preserving and protecting both the beauty and the economic value of The Last, Best Place.

Therefore, it is important that we continue to work together to ensure that these places are safe this year, for next year, for the next generation, and for the generations to come.. 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 doesnt offer any protection for the South Cottonwood Area or Mount Blackmore. There is no reason why the Hyalite region needs to be logged so why allow it to be logged? Its sociocultural valu and significance greatly exceed any temporary gain to be had through the extractive industries. Such use causes harm, in most cases irreparable, that can destroy the sociocultural value of an entire region for centuries.

Therefore, it is important to protect areas like South Cottonwood and Mt. Blackmore from logging and roadbuilding. 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.

We have pillaged and plundered the Eastern half of our Nation. As an example, Greene County, Pennsylvania has been plundered of its timber, its coal, its oil, and is now being plundered of its natural gas reserves. Few jobs

remain. The scars left by these extractive industries have rendered large portions of the County essentially valueless.

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.