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First name: David Last name: Drake Organization:

Title:

Comments: Re: Objections to the Custer Gallatin National Forest 2020 Land Management, Draft Record of Decision, and Final Environmental Impact Statement Responsible Official: Mary Erickson, Supervisor, Custer Gallatin National Forest

Dear Supervisor Erickson,

My objection is that Option D was not adopted and, more emphatically, that wilderness designation was not proposed for the entire area which comprises the Hyalite Porcupine Buffalo Horn WSA. The Hyalite-Porcupine-Buffalo Horn WSA provides choice forest habitat for grizzly and black bears, elk, moose, and mountain lion. The management plan would drastically reduce overall protection for the Gallatin Range and all but sever the link between the proposed Gallatin RWA and the Yellowstone NP/Lee Metcalf region to the south. Best available science indicates that connectivity is essential for wildlife viability and the proposed plan leaves only a sliver of protected "key linkage" bottleneck between the Gallatin RWA and the southwestern expanse of the Greater Yellowstone area. Adjacent and to the west of this narrow corridor is the proposed Buffalo Horn Backcountry Area which ensures no enduring protection whatsoever. "Backcountry Area" is a rhetorically misleading designation as it entails no continuity of backcountry character whatsoever - more accurately this management disposition would be designated a "Discretionary Use Area," or an "Area of Industrial Potential." I do not believe that the Forest Service can honestly in good faith expect a backcountry area to long remain free of industry and/or motorized recreation given the contemporary trends in American land management. Backcountry Areas are a bait-and-switch concept.

To propose anything less than wilderness designation for the territory currently within the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area is a disgraceful sacrifice. This is an ecologically and geologically unique region not just within Montana or the United States, but worldwide. It is precious and rare and by reducing protection the forest service will be selling it out to industry and noisy toys that will destroy the region's wild character. The forest service has a chance to do something sensible and right, and instead proposes the further erosion of the last semblance of pristine, intact mountain wildlands in the lower 48. Motorized recreation user groups and industrial interests already have forest access and rights throughout the Yellowstone region and, for that matter, throughout the great majority of public land in the United States. I mean no disrespect to you, Supervisor Erickson, and I appreciate your responsibilities in creating a plan of such magnitude, but to propose further fragmentation and degradation of the Greater Yellowstone ecosystem for the sake of wholly unnecessary destructive and disruptive activities would seem to indicate willful shortsightedness and a gross lack of perspective.

To improve the plan, please reconsider wilderness designation for all territory outlined as such in Option D. Failing that, please propose wilderness designation for all land within the Hyalite-Porcupine-Buffalo Horn WSA. Failing that, at least consider a significantly expanded wilderness corridor to link the proposed Gallatin Crest RWA to the southwestern expanse of the Greater Yellowstone region.

This objection is consistent with the comments I submitted in March of 2018 and June of 2019 when I urged the adoption of Option D and specifically advocated for wilderness designation for the entire Hyalite-Porcupine-Buffalo Horn WSA.

Thank you for your time and consideration.

Sincerely,

David Drake