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First name: Mike

Last name: Anderson

Organization: The Wilderness Society

Title: Senior Policy Analyst

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Regional Forester Leanne Marten

Objection Reviewing Officer

USDA Forest Service Northern Region

Via CARA Objection Webform:

<https://cara.ecosystem-management.org/Public/CommentInput?project=44589>.

Subject: Custer-Gallatin Forest Plan Objection

Dear Regional Forester Marten:

Pursuant to 36 CFR Part 219 Subpart B, The Wilderness Society (TWS) is objecting to portions of the Draft Record of Decision (DROD), 2020 Forest Plan, and Final Environmental Impact Statement (FEIS) for the Custer-Gallatin National Forest (CG). The Responsible Official for the CG plan revision is Mary Erickson, CG Forest Supervisor.

TWS appreciates the major effort that the Forest Service has put into revising the CG Forest Plan based on the 2012 Planning Rule. We particularly commend the CG planning team and other personnel for conducting extensive public outreach and for listening and responding to public input throughout the planning process. We also applaud the Forest Service for incorporating many of the collaboratively developed recommendations of the Gallatin Forest Partnership (GFP) in the revised plan.

However, we object to some key aspects of the CG planning documents, and we urge the Forest Service to make significant, targeted changes to improve the final plan through the objection process. As discussed below, our objections and suggested improvements focus on wilderness recommendations and management of recommended wilderness. We also fully support and endorse the objection submitted by the GFP.

TWS has provided written comments at multiple stages of the planning process, including the Assessment, Chapter 70 wilderness inventory and evaluation, Proposed Action/Scoping, and the Draft Plan and EIS. We recognize that the Forest Service has often been attentive and responsive to the information, issues, and concerns that TWS and others have provided during the opportunities for public participation. For example, we are pleased that the 2020 Plan/Alternative F reflects our comments regarding the management of motorized and mechanized uses in Recommended Wilderness Areas, and we intend to engage further on that issue as an interested person in the objection process, if necessary.

#### 1. Wilderness Recommendations

Alternative F's wilderness recommendations add and omit several areas recommended in other alternatives. Overall, Alternative F recommends wilderness designation for a total of 125,675 acres in seven different Recommended Wilderness Areas (RWAs).

Alternative B Alternative C Alternative F

Bear Canyon--10,366

Lost Water Canyon 6,804 6,804 7,692

South Crazy Mountains--10,250  
Gallatin/Gallatin Crest67,63399,41577,631  
Sawtooth Mtn.14,828-14,461  
Taylor Hilgard4,4666,8244,466  
Lionhead17,98315,738-  
Cowboy Heaven-15,536-  
A-B Addition -Timberline 802802802  
A-B Additions - Mystic, Republic, Line Cr. Plateau1,4361,436-  
Total113,382145,777125,675

We appreciate Alternative F's wilderness recommendations for South Crazy Mountains and Bear Canyon, neither of which was proposed in Alternative B or C in the Draft EIS. We particularly commend the Forest Service for consulting with and taking to heart the Crow Tribe's interest in preserving the Crazy Mountains. As stated in the DROD (p. 15), "The Crow Tribe holds the Crazy Mountains sacred because of significant cultural and historical connections and longstanding treaty rights."

RWA designation will provide especially important new protection of Bear Canyon, since this area is not an Inventoried Roadless Area and therefore is not protected from road building and logging by the Roadless Area Conservation Rule.

However, we object to key omissions in the RWA designations in Alternative F. Of particular concern are the omission of Lionhead, Cowboy Heaven, portions of the Gallatin Crest, and several small additions to the Absaroka-Beartooth Wilderness.

#### Lionhead

The omission of Lionhead from Alternative F's wilderness recommendations is deeply upsetting. As stated in the DROD (p. 16), the Lionhead area "has been managed under the 1987 Gallatin plan as a recommended wilderness area for more than 30 years." However, during this time, mountain bikes have been allowed to use 18 miles of trails that access the core of the area. The DROD acknowledges that the area is "highly valued by wilderness advocates" and is "not heavily used" by mountain bikes. Yet, the Forest Service nonetheless chooses to drop its longstanding wilderness recommendation for Lionhead.

We cannot accept the DROD's assurances that Backcountry designation of Lionhead "will protect the current character of the area" and "will allow existing uses to continue as long as they do not degrade the character of the area," and that "[n]o new uses that would detract from the area's character would be allowed." First, Backcountry designation allows timber harvesting to occur and provides no plan components to protect Lionhead's secure habitat for grizzly bear and primary wolverine habitat (FEIS, App. D, p. 279).

Second, the 2020 Plan provides scant assurance that the wilderness character of Lionhead will not be degraded by leaving the area open to mountain biking. If the area is as popular and attractive to mountain bikers as the Forest Service considers it to be - enough to outweigh the area's exceptional wilderness qualities, in the agency's opinion - what is going to prevent more mountain bikers from using the area?

Indeed, the Plan's monitoring program provides no questions or indicators that would enable the Forest Service to detect an increase in mountain bike usage in Lionhead. The only monitoring of recreational "travel incursions" will focus on motorized travel (MON-REC-02) and signage near designated wilderness and RWAs (MON-REC-02), not mountain biking in Backcountry Areas (see Plan, p. 200).

Furthermore, the DROD incorrectly implies that Backcountry designation is the only way to protect Lionhead

without losing mountain bike access. For example, coupling Alternative B's RWA boundaries for Lionhead with Alternative F's RWA plan components, which is TWS's preferred option for Lionhead, would allow continued mountain biking on the Continental Divide Trail while protecting the rest of the Lionhead area to the north of the Trail. Under Alternative C, "most of the trails used by mountain bikes have been excluded from the recommended wilderness area; mountain bike use would no longer be suitable on about 1.49 miles of trail to Coffin Lake" (FEIS App. D, p. 279). Thus, the DROD fails to take into account or even acknowledge the agency's own wilderness analysis regarding alternatives to protect Lionhead's wilderness character while maintaining significant mountain bike access.

#### Cowboy Heaven

We object to the DROD's decision to manage Cowboy Heaven as a Backcountry Area instead of recommending it for wilderness in the 2020 Plan. RWA designation of Cowboy Heaven is an integral part of the GFP Agreement, which TWS supports. As discussed in the GFP's objection, the wilderness potential of Cowboy Heaven is well documented, and the benefits of designating the area as RWA far outweigh any downsides.

\*The area is adjacent to two units of the Lee Metcalf Wilderness and recommended wilderness on the Beaverhead Deerlodge National Forest. The CG's wilderness evaluation acknowledges that a portion of the RWA "would make for a more logical and manageable wilderness boundary than now exists" (FEIS, App. D, p. 271).

\*The three major local mountain bike groups - Big Sky Mountain Bike Alliance, Livingston Bike Club, and Southwest Montana Mountain Bike Association - all support a Recommended Wilderness designation.

\*All six members of the Gallatin and Madison County Commissions have endorsed the GFP Agreement, and thus have endorsed recommending Cowboy Heaven for wilderness.

\*The presence of allotments and range infrastructure is not a valid reason for denying Cowboy Heaven a wilderness recommendation. The Wilderness Act does not preclude grazing or grazing infrastructure, and Congressional Grazing Guidelines clearly state that "wilderness designation should not prevent the maintenance of existing fences or other livestock management improvements, nor the construction and maintenance of new fences or improvements which are consistent with allotment management plans and/or which are necessary for the protection of the range." Recommended Wilderness should not be held to a higher standard than designated wilderness and the guidelines set by Congress for managing wilderness.

\*Flexibility to conduct fuel and restoration treatments is not a valid rationale to allocate the area to Backcountry instead of Recommended Wilderness. The location of Cowboy Heaven, bordered by two units of the Lee Metcalf Wilderness and recommended wilderness on the Beaverhead-Deerlodge NF, would make intensive fuels work inconsistent with the management and desired conditions of the adjacent land. Furthermore, Cowboy Heaven is not a logical place to prioritize resources on fuels reduction compared to areas adjacent to the Gallatin River Corridor. Low impact restoration activities, which are allowed in recommended wilderness, would be a better fit for this area and more consistent with land management across the larger area.

\*A Backcountry Area designation for Cowboy Heaven is insufficient because it fails to provide consistency with the larger landscape, which includes designated wilderness, recommended wilderness on the Beaverhead-Deerlodge NF, and a large private ranch managed for conservation purposes. As the lone unprotected parcel in the landscape, failing to recommend it for wilderness is incongruous with management of the surrounding landscape and is inconsistent with the 2012 Planning Rule's requirement to take into account conditions in the broader landscape (36 CFR 219.8(a)(1)(iii)).

#### Gallatin Range

We are glad that Alternative F recommends 92,000 acres of wilderness in the Gallatin Crest and Sawtooth Mountain RWAs within the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area. However, we object to the omission of a small area that divides the GFP's Gallatin wilderness recommendation into the two separate parcels. As discussed in the GFP's objection, connecting the Sawtooth and Gallatin Crest RWAs into a single Gallatin RWA would create a more cohesive and manageable area with significant conservation benefits.

We also object to placing the boundary of the Gallatin Crest RWA on the Hyalite Peak ridge, rather than extending this boundary to Hyalite Lake as mapped in the GFP Agreement. Including all of Hyalite Peak in the RWA would ensure that trail #427 is protected from motorized use. Furthermore, no resource or recreation management conflicts would result from extending the RWA boundary to Hyalite Lake.

We are pleased that Alternative F includes the GFP's suggested Taylor Hilgard addition. While the recommended wilderness in Alternative F does not fully match GFP's proposal for this area, we understand the rationale for pulling the recommended wilderness boundary away from the road.

#### A-B Additions

We object to the DROD's decision to discontinue the wilderness recommendations of four small areas that were recommended in the 1986 Custer forest plan and in both Alternatives B and C in the DEIS. The rationale provided in the DROD for dropping the Republic Mountain, Line Creek, and Burnt Mountain RWAs - that "there is no value to a recommended wilderness allocation" of these areas - is contradicted by the agency's own wilderness evaluation.

For example, Line Creek RWA would significantly augment the ecological values of the designated wilderness. According to the agency's wilderness evaluation, the Line Creek RWA is part of the Line Creek Plateau Research Natural Area, which covers -

the easternmost, warmest alpine plateau in the Beartooth Mountains. The area is composed of alpine snow beds, alpine wetlands, alpine turf, alpine cushion plants (compact, low growing, mat forming plants), alpine grasslands, conifer forests, and shrublands. Of the 21 vegetation types, 17 meet research natural area network-targeted vegetation types (nine alpine, seven coniferous, and one shrubland). There are several rare plant species and many plant species that are disjunctive from the main portion of their range in the arctic. (FEIS, App. D, p. 230).

Similarly, the Republic RWA would add primitive recreational value to the designated wilderness. According to the wilderness evaluation (FEIS, App. D, p. 244-45), "This area offers unconfined and primitive recreation opportunities especially noted for backcountry skiing 'The Fin' on the side of Republic Peak." Thus, the area provides "high level of opportunity for primitive and/or unconfined recreation for rugged cross-country travel and expert level backcountry skiing."

#### Remedies

\*The Final Plan should include the Lionhead RWA as described in Alternative B, with the suitability plan component provided in Alternative F.

\*The Final Plan should include the Cowboy Heaven RWA as described in Alternative C.

\*The Final Plan should include the Gallatin RWA as described in Alternative C.

\*The Final Plan should recommend Wilderness designation of the A-B Additions as described in Alternative C.

## 2. Management of Recommended Wilderness Areas

TWS supports Alternative F's balanced approach toward motorized and mechanized uses, including the intended prohibition of non-conforming recreational uses such as mountain biking and snowmobiling, in all RWAs. However, the Forest Service should make the following three changes to clarify RWA management direction before issuing a Final ROD.

First, we strongly support the 2020 Plan's clear direction that "[r]ecommended wilderness areas are not suitable for motorized or mechanized transport" (FW-RWA-SUIT-02). Throughout the planning process, we have emphasized the need to protect RWAs from mountain bikes and other non-conforming uses in order to ensure

compliance with the 2012 Planning Rule's requirement to "protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation" (36 CFR 219.10(b)(1)(iv)). However, we are concerned about the lack of assurance that this plan component prohibiting motorized and mechanized transport in RWAs will be implemented in a timely manner.

Specifically, we object to the Draft ROD's vague commitment to "initiate site-specific planning per the plan's suitability direction as soon as practicable from the date of this decision." (DROD, p. 27, emphasis added). This is a less specific time frame for implementation than other recent Region 1 plan revisions. Both the Flathead National Forest final ROD and the Helena-Lewis & Clark draft ROD have at least committed to initiate site-specific planning to implement their plans' RWA suitability direction for motorized/mechanized transport within 3 years of signing the final RODs. Therefore, at a minimum, the Final ROD should commit to initiating the site-specific planning "as soon as practicable but no later than 3 years from the date of this decision."

The Wilderness Society has raised other concerns about relying solely on a suitability plan component to prohibit motorized/mechanized transport in RWAs in our pending objection to Helena-Lewis & Clark plan revision. Specifically, we have argued that the plan must include standards and guidelines to ensure compliance with the 2012 Planning Rule's requirement to protect the wilderness characteristics of RWAs. Rather than repeating the arguments we have made in that objection, we request that the Custer-Gallatin Final ROD and Plan be further modified consistent with any instructions that the Reviewing Officer provides in response to our Helena-Lewis & Clark objection regarding the use of standards and guidelines to protect RWAs from motorized/mechanized transport.

Second, we object to the lack of clarity in the FEIS regarding use of prescribed fire in RWAs. The 2020 Plan seems to provide clear management direction allowing the use of prescribed fire in plan component FW-RWA-SUIT-03: "Recommended wilderness areas are suitable for low impact restoration activities that move toward desired conditions (such as prescribed fires, active weed management, planting) and that protect and enhance the wilderness characteristics of these areas." (Plan, p. 125, emphasis added)

However, the FEIS is unclear and confusing on this issue. In its discussion of fire and fuels management in RWAs, the FEIS (vol. 2, p. 370) appears to conflate "wildland fire" and "prescribed fire" in the following:

Under the revised plan alternatives wildland fire may be used if needed as a restoration tool. The 1986 Custer Plan does not allow prescribed fire [in] recommended wilderness areas, while the 1987 Gallatin plan allows this use. The use of all wildland fire enhances the options for restoration of recommended wilderness areas. Wildland fire is managed to play its natural role while managers evaluate point protection of values at risk .... Fuel treatments such as hand thinning may occur, especially in the wildland-urban interface ....

Especially considering that the original Custer and Gallatin forest plans provide inconsistent direction regarding use of prescribed fire in RWAs, it is important that the FEIS clearly state that prescribed fire can be used in RWAs forest-wide.

Our suggested remedy for this problem is simply to modify the first sentence of the FEIS paragraph quoted above to state, "Under the revised plan alternatives prescribed and wildland fire may be used if needed as a restoration tool."

Third, we object to the lack of management direction in the Custer-Gallatin plan regarding use of chain saws to maintain trails within the RWAs. The plan includes a desired condition (FW-DC-RW-04) that "[s]ystem trails support wilderness experiences and preserve wilderness characteristics" in RWAs. However, the plan seems to leave unanswered the important question of whether chain saws are an appropriate trail management tool in RWAs.

In comparison, the Helena-Lewis & Clark final plan includes the following suitability plan component: "Motorized and mechanized equipment (such as chain saws to clear trails) are suitable for accomplishing restoration activities and/or administrative work." (HLC Final Plan, p. 77). The Wilderness Society supports common-sense use of chain saws to manage trails in RWAs, as provided for in the Helena-Lewis & Clark plan. We suggest that the Custer-Gallatin plan include a similar plan component to address this concern.

In addition, we object to removing the Windy Pass cabin from the rental program. As explained in the GFP objection, this cabin is extremely popular with the public, supports the Bozeman Ranger District recreation budget, and does not conflict with the Plan's desired conditions for RWAs.

#### Conclusion

The Wilderness Society appreciates the Forest Service's hard work throughout the CG forest plan revision process. We hope that you will view the issues and recommended changes in this objection as opportunities to make improvements in the final plan. We look forward to continued collaboration with the Forest Service in the CG.

Sincerely,

Mike Anderson, Senior Policy Analyst  
The Wilderness Society