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First name: Paulette

Last name: Epple

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

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

My objections apply to some of the wilderness study areas that were not designated as Recommended Wilderness Areas. The Backcountry designations provide insufficient protections of our natural resources in these areas and allow for unsuitable expansion of motorized and mechanized uses in the future. I also have objections to the broad Summer Recreation Opportunity Spectrum of 'Semi-primitive Motorized' on the Bridger Mountains National Recreation Trail and to the lack of guidelines protecting wildlife within the Hyalite REA.

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

\*The reasons for this objection are:

\*Pryor Mountains: I commend the Forest Plan designation of the Bear Canyon area for Recommended Wilderness Area and the expansion of the Lost Water Canyon RWA. I object to the Backcountry Area designations for the Punch Bowl and Big Pryor areas and request that these areas also be protected with RWA designations. As I have stated before, the Pryor Mountains are a unique ecosystem with incredible plant and bird biodiversity like no-where else in Montana. They are currently heavily used by motorized and mechanized users on over 100 miles of road. Wildlife need a safe retreat from motorized and mechanized use. So do forest users like myself who are looking for solitude and quiet birdwatching opportunities which are impossible to find on the current road network. The Backcountry designation does, per quote from the Plan, "provide for less developed, semi-primitive recreation opportunities, both motorized and nonmotorized in both summer and winter." This is not strong enough protection for these special lands and it allows for major land use changes in the future.

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\*Bridger Mountains: I commend the Forest for recognizing the Key Linkage Area of the west Bridgers and the importance of the area for wildlife movement. I object to the Summer Recreation Opportunity Spectrum of 'Semi-primitive Motorized' on the Bridger Mountains National Recreation Trail on the section between Truman Gulch and Middle Cottonwood. I hiked this section with friends this summer and we were appalled by the terrible destruction of resources and the erosion being caused by motorized bikes on and off the trail. In some of the steepest sections, motor bikes were not able to stay on the trail due to wet conditions, steep trails, fallen trees and the degraded condition of the trail and thus they had pioneered numerous new trails through sensitive terrain to get through. It is an area where motorized use is inappropriate and damaging. If motorized use is to be allowed there, appropriate trail work should be done to make a trail of an appropriate grade that can accommodate motor bikes responsibly.

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\*Crazy Mountains: I applaud the Forest designation of the South Crazy Mountains RMA. This is an area that truly deserves such protection. However, the entire interior of the Crazy Mountains has similar scenic, wilderness and wildlife value and I have even seen a wolverine in there. The unfortunate checkerboard ownership makes it difficult to manage but I object to the Backcountry designation of so much of the interior of the Crazy Mountain Range since it does not entirely preclude motorized and mechanized uses. The area should

be managed as possible wilderness while the consolidation of the checkerboard ownership is pursued. Motorized and mechanized uses should be not be allowed in the Sweet Grass Creek drainage, the Big Timber drainage and the areas around Campfire and Sunlight lakes.

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\*Cowboy Heaven: I object to the BCA designation of the Cowboy Heaven Area. This area has all the attributes of wilderness quality and serves as valuable wildlife corridor connection between the Beartrap Canyon Unit and the Spanish Peaks Unit of the Lee Metcalf Wilderness. The BCA allows for future mountain bike trails in this area to the detriment of wildlife. As demonstrated through the Gallatin Forest Partnership, local mountain bike organizations are willing to support wilderness designation in this area and not advocate for more mountain biking trails in this area. This compromise should be respected and the area should be recommended for wilderness.

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\*Gallatin Mountains: I especially object to the north boundary of the Gallatin Recommended Wilderness Area not extending north along the Gallatin Crest to Hyalite Peak. As I mentioned in the past this area has the same wonderful wilderness quality, the same fragile alpine terrain, and the same great wildlife habitat as the rest of the crest. It deserves the same wilderness protection. It is not a part of the Hyalite drainage and should not be included in the Recreation Emphasis Area which offers little protection to wildlife, soils, vegetation, and water. The Hyalite REA allows for a broad range of uses inappropriate in this high alpine terrain. By not providing RWA protection, this paves the way for the future possibility of mountain bike trails in a community that is growing rapidly and putting more pressure on our wildlands. The Gallatin Forest Partnership Agreement is a carefully developed compromise agreement by a diversity of groups which unanimously agreed that this area should be designated wilderness while other areas would be available for mountain biking. The frailty of the Gallatin Crest habitat, soils, wildlife, and water sources should be preserved with wilderness recommendation right up to Hyalite Peak and the divide it is a part of.

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\*Buffalo Horn Backcountry Area: The Buffalo Horn area is recognized as one of the most valuable wildlife habitats in the Greater Yellowstone Area as well as an important connecting corridor for wildlife including Grizzly bears. I object to the Backcountry designation and instead encourage RWA designation. If this area is to remain a Backcountry area, I object to the minimal Plan Components and Desired Conditions on the area. The only Desired Conditions are concerned with recreation and allowing motorized and mechanized use both summer and winter alike. The needs of wildlife are not mentioned, and there is no discussion of putting any limits on recreational uses that could negatively impact wildlife. One would think from the Plan Components that the area is one big playground for recreationists with no regard to any other resource. Please recognize the significant value of the habitat of this area for wildlife, monitor wildlife use, and restrict recreational uses for periods of time when motorized or mechanized uses negatively impact wildlife.

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\*Hyalite Recreation Emphasis Area: I object to this Recreation Emphasis Area not also including the heavily used South Cottonwood Creek and Bozeman Creek drainages. I encourage you to include these areas within a Recreation Emphasis Area. However, in spite of the recreation emphasis, the REA Plan Components should also provide protections for wildlife and their habitats. There should be a balance in the desired conditions and guidelines between protection of natural resources and recreational use.

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\*Proposed Solution:

I recommend these following solutions:

\*Designate Punch Bowl and Big Pryor Areas as RWAs

\*Change the Summer Recreation Opportunity Spectrum of 'Semi-primitive Motorized' on the Bridger Mountains National Recreation Trail to allow for closure to motorized use where needed to protect the environment from motorized degradation

\*Protect the interior of the Crazy Mountains with a larger RWA designation to fully protect it until land consolidation can be attained.

\*Designate Cowboy Heaven as an RWA

\*Extend the north boundary of the Gallatin Recommended Wilderness Area to Hyalite Peak and the divide it is on.

\*Designate the Buffalo Horn Area as an RWA or if it is to remain a Backcountry Area, then add plan components, desired conditions, and guidelines to manage use in a way that protects the wildlife and the environment. Do not allow new trails to be pioneered.

\*Strengthen the Hyalite REA guidelines to include balanced protection of wildlife and natural resources while providing for a variety of recreational uses. Add the same management to South Cottonwood Creek and Bozeman Creek.

Statement demonstrating the link between objection and prior formal comments:

I have previously submitted comments regarding issues in the same geographic areas, both on 6/6/19 for the Draft EIS of the Draft Revised Plan for the CGNF and on 3/4/18 for the Proposed Action for the Revised Plan for the Custer Gallatin National Forest

Signature: Paulette Epple