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Title:

Comments: I want to file as an interested person, and on behalf of my group, Great Old Broads for Wilderness, because I strongly object to the proposal in the Custer Gallatin Forest Plan.

I am interested in participating in any resolution discussions between objectors and the reviewing official for the following objection issues:

Illegally disregarding the 1977 Montana Wilderness Study Area Act which requires that WSA lands be managed for future inclusion as Congressionally designated Wilderness under the 1964 Wilderness Preservation Act.

Failure of the agency to curb non-wilderness forms of mechanical and motorized transport in the WSA area.

Failure to follow the intent of a 2011 Court decision on this matter, by substituting mountain biking which did not exist in 1977 for some motorized uses.

Failure to consider history of areas in Gallatin Range that were subject to Congressional action and land trade action with the express intent that the subject areas in the HPBH WSA would be therefore eligible as recommended wilderness.

No documentation in plan for why areas are disqualified as recommended Wilderness. Arbitrary and capricious preference for industrial recreation over ecosystem health.

Unfounded and perhaps illegal reliance on recommendations of the Gallatin Forest Partnership, a special interest economic group which specifically excluded much of the public, including grassroots wilderness advocates, and some motorized and mechanized advocates. The FS may be in violation of the Federal Advisory Committee Act in doing so.

Relying on County Commissioners to represent the local public; giving inordinate weight to the opinions of three partisan elected officials who did not solicit public input for their decision.

Ignoring the importance of wildlife migration corridors and wildlife habitat by prioritizing human recreational use which displaces wildlife.

Ignoring climate change science. Refusing to cite local peer-reviewed science by Dr. Lance Craighead, Dr. Cathy Whitlock and others that specifically predicts biodiversity losses on this landscape due to climate change. Failure to plan measures to mitigate these losses with proactive steps.

Ignoring increasing population pressures that are ever increasing, and not protecting the ecosystem accordingly. Failure to propose standards and guidelines adequate to limit overuse of resources.

Relying on a plan to monitor adverse conditions and then consider actions, when the effects may be irreversible. Proposed timber harvest is not sustainable. Failure to use current best science, with valid assumptions about sustainability.

No new buildings, no airstrips or similar developments, reroute the Big Sky Snowmobile Trail out of the WSA.

Need new management plans for Lee Metcalfe and Absaroka Beartooth Wilderness Areas.

The Forest is wrong to be concerned about "safeguarding" high quality recreation experiences. This is not a safety issue. The Forest has higher obligations to maintain the health of the ecosystem and its inhabitants, not provide a playground for humans when their use impacts the resources negatively.

The Forest Service is not considering the phenomenon of Mass Extinction currently underway.

All of the above problems can be rectified by choosing Alternative D, Wilderness, in the Gallatin Range, as well as the Crazy Mountains, Bridgers, Absaroka Beartooth additions, Pryor Mountains wilderness, and the rest of proposals under Alternative D in the proposed plan. No less than 230,000 acres of recommended Wilderness in the Gallatin Range.

The Forest Service should list Bison as a Species of Conservation Concern, as well as bighorn sheep, grizzly bears and wolverines and lynx.