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Wednesday, June 5, 2019

Subject: Keep the Custer-Gallatin wild; make the plan better -- Custer Gallatin Forest Plan Revision #50185

To Custer-Gallatin National Forest Supervisor Mary Erickson:

Thank you for the opportunity to comment on the draft plan for the Custer Gallatin. While I recognize the hard work that has gone into this draft plan and I support the wilderness recommendations in Alternative D of the Revised Draft Forest Plan, I believe that the best way forward for the Custer Gallatin National Forest (CGNF) is not contained within a single alternative. The wilderness recommendations must be improved by adding the entire 230,000 wild, roadless acres of the Gallatin Range as Recommended Wilderness in the final forest plan.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

Specifically, I would like to see two roadless areas in the northern Bridgers around Blacktail and North Cottonwood recommended for wilderness. I would like three roadless areas within the Crazies to be recommended for wilderness (significant areas of polygons 36, 37, and roadless area between these). The forest plan should recommend a significant portion of the Gallatin Range for wilderness, including the exceptional wildlife habitat in the Porcupine-Buffalo Horn area, South Cottonwood, Hidden Lakes, and West Pine.

In the Absaroka-Beartooths, several drainages adjacent to existing wilderness are also worthy of wilderness recommendation including Line Creek, West Fork/Lake Fork of Rock Creek, Mill Creek, East Rosebud, and Main Fork Rock Creek. In the Madisons, the area south of the Taylor Hilgard Wilderness Unit should be recommended for wilderness designation. Cowboy's Heaven should be recommended for wilderness due to the important wildlife linkage it provides to portions of the Lee Metcalf Wilderness. I support the previous forest plan's recommendation of nearly 23,000 acres of wilderness in the Lionhead. Large portions of the Pryors roadless areas including Big Pryor, the Punchbowl, Lost Water Canyon, and Bear Canyon should be recommended for wilderness.

The plan should prohibit all motorized and mechanized uses, and any other activities not consistent with wilderness protection, in the Recommended Wilderness areas so as to preserve their wilderness qualities until Congress acts on the wilderness recommendations.

Disappointingly, the draft plan has little direction for administering the Absaroka-Beartooth and Lee Metcalf Wildernesses. The current wilderness management plans allows destructively large groups of up to 25 head of stock (horses and mules) and 15 people in most areas. Research shows that impacts increase significantly when group-sizes exceed eight head of stock and 12 people. The Forest Service should reduce group size limits accordingly so as to protect all Wildernesses on the forest from harm. Further, the forest plan should put

an end to ecologically destructive fish stocking in naturally fishless wilderness lakes, which significantly alters the areas' natural conditions.

The plan must also address the issue of human and pack animal feces contamination of lakes and streams on the Beartooth Plateau in the Absaroka-Beartooth Wilderness. Eliminating fish stocking would likely go a long way toward solving this problem, but additional measures must be included if needed.

Vacant grazing allotments in the Wildernesses should be closed so these areas can return to a wild condition. The management plan should facilitate the return of bison to their historic range and allow them to move freely through their native habitat, with the goal of a year round self-sustaining bison population in the CGNF.

The plan should also prohibit trail construction or reconstruction in the currently trailless areas of the Absaroka Beartooth and Lee Metcalf Wildernesses. Doing so will provide remote areas for wildlife as well as premier areas for solitude.

I also support the designation of the thirty eligible wild and scenic rivers as a key component of protecting riparian ecosystems of the CGNF.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish--indeed, all the living creatures of prairie and woodland and seashore--from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- Theodore Roosevelt

I believe that these wilderness and wild and scenic recommendations are necessary because this forest will face tremendous challenges in coming years. The rapidly increasing population of Gallatin County and climate change will significantly impact the CGNF. The revision of this forest plan is our best opportunity to protect this incredible ecosystem. The management of this forest should lean towards wilderness preservation because if we do not act now, we will not get a second chance.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA