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Comments:

Custer Gallatin Proposed Forest Plan--My comments Part II

The proposed plan does not adequately provide for the long-term protection of wilderness character in the Absaroka Beartooth and Lee Metcalf Wildernesses. In pages 112 - 119 of the Draft Revised Forest Plan there are no alternatives being considered for the wilderness management direction for the Absaroka Beartooth and Lee Metcalf. This is a critical piece! Regardless of the amount of wilderness designated, if there is not a robust plan for enforcing and maintaining wilderness quality the plan has no teeth.

The revised Forest Plan will likely be in place for decades and the plans for wilderness management in the revised Forest Plan must be strong and specific enough to ensure that wilderness character is maintained or enhanced. The plan needs more direct language pertaining specifically to the 5 qualities of wilderness. The wilderness wide Desired Conditions, Goals, Objectives, Standards and Guidelines section is really 30,000' level and needs to be more succinct. The narrative for individual zones is much better, but lacks critical discrete standards that should vary from zone to zone.

The current Absaroka Beartooth and Lee Metcalf plans are dated, and will go away entirely when the new Forest Plan is published. The new Forest Plan needs to provide appropriate guidance to protect wilderness character, and at a minimum set the stage for completing revisions to the more site specific direction the AB/LM wilderness plans will provide.

Other Forests in the Region with major wildernesses like the Bob Marshall complex, Selway Bitterroot, or Anaconda Pintlar have much more recent wilderness plans that define management strategies to maintain wilderness character, and thresholds/triggers that identify when unacceptable changes are occurring. The AB and LM don't have that. That means it wasn't as critical that the Forests that recently revised their plans include very robust language, several of which were revised under old planning rules. That is not the case here. The historic Lee Metcalf and Absaroka Beartooth Wilderness Plans were appended to the 1987 Forest Plan.

When the 1987 Forest Plan is replaced with this new version, there will no current AB or LM wilderness management plans. This is not acceptable. The wilderness plans must be revised concurrently or soon after the FP is published in order to provide clear unambiguous measurable standards used to measure change to wilderness character.

Please pay as much attention to the specifics as to the designation of Plan A, B, C, D or E.

Thank you for your consideration,