

May 28, 2019

Comments on Draft Environmental Impact Statement for the CGNF  
Forest Plan Revision

I'm retired and live in Bozeman. My current thoughts about the CGNF and the Forest Plan started to form decades ago. I grew up in Kansas, a state that has no Wilderness and very little public land. Growing up without easy access to public land convinced me when I was very young (even if I didn't fully understand it) that public land is truly one of America's best ideas.

After college, my wife and I moved to Wisconsin where we worked for 30 years. Wisconsin has lots of natural beauty and quite a bit of public land but the motorized advocates won that state long ago. It was nearly impossible to get away from the sound of their machines even in the small areas of "Wilderness" that Wisconsin has. Wisconsinites seemed to take this all for granted and there wasn't opportunity to do anything about it. While living there I started to realize the value of reserving large swaths of public land that the motorized folks didn't have access to.

When we moved to Bozeman about 10 years ago, I began to more fully understand how important intact wild land is to the natural ecosystem, not just to human use. Humans are far too focused on how they can recreate or otherwise use public lands, ignoring the non-human benefits that public lands provide. How many times have you heard Wilderness referred to as "worthless" because you can't ride your motorcycle or snowmobile there? There's obviously a lot more to it. This is where I'm coming from and that's why I support recommending as much of the CGNF for Wilderness protection as practical.

I will not attempt to comment on Forest Service management of invasive weeds, timber production, or the positive economic impact of maintaining and enhancing our public lands. I also have no comments on the Absaroka-Beartooth, Ashland, or Sioux Geographic Areas as I don't feel I have enough first-hand knowledge of those areas. Some general comments first.

In addition to what I outline above, there are a number of other reasons I encourage the Forest Service to maximize Wilderness designation and protection in this Forest Plan Revision. An incomplete list follows.

1. The opportunities to protect our public lands in their natural state are rapidly disappearing every day. This is especially true with the current Republican administration. Our public lands have turned into political pawns and potential profit centers with extractive use being emphasized. Hopefully this country will eventually come to its senses and recognize the importance protecting our wild landscapes.
2. The rapidly rising population of southwest Montana and beyond puts increasing pressure on wildlife, habitat, fish, native flora, air quality, and our supply of clean water. Wilderness protection is one effective way to counter this pressure.
3. In this hectic world, the quiet wilderness experience is increasingly hard to find. It is our responsibility to ensure that future generations have the same opportunity to experience quiet wilderness as we have. Once that opportunity is gone, it's gone for good.
4. The Gallatin Range is the last remaining unprotected Mountain Range in the unique Yellowstone Ecosystem. Among many other attributes, this range plays a key role in linking the Yellowstone ecosystem with ecosystems further to our north.

I could list many more reasons for maximizing Wilderness protection but this list will do for now.

Of the five alternatives (A-E) listed in the DEIS, Alternative D is the one I would most like to see emphasized. I recognize, however, that the Forest Service will need to make compromises. For that reason, my realistic recommendations will mostly be a combination of Alternatives C and D. Alternatives E looks like CBU's wet dream and doesn't offer anything of interest to me.

Comments on specific geographic areas.

Madison Gallatin Geographic Area.

In general, I support many of the proposals recommended by the Gallatin Forest Partnership. It is impressive that a diverse (although not complete) group of individuals can work out a proposal that has been elusive for the past 42 years.

1. In the Lionhead area, The Forest Service has previously recommended much of this for Wilderness designation and I continue to support this with no nonconforming use allowed.
2. Agree with Taylor Hilgard RWA for the area just south of the Taylor Hilgard unit of the Lee Metcalf Wilderness.
3. Recommend Cowboy Heaven as a RWA. This is the IRA between the Spanish Peaks unit of the Lee Metcalf Wilderness and the Bear Trap Canyon Wilderness (BLM) along the Madison River. This would tie the two currently separate Wilderness areas together.
4. Agree with RWA designation of the Sawtooth area adjacent to the North Border of Yellowstone NP as depicted on either Alternative C or D (preferred). This hard to access area would provide a further buffer for Yellowstone NP and its unique collection of wildlife.
5. In the Gallatin Crest RWA, I recommend the following.
  - a. Extend RWA in Big Creek area south of Big Creek such that it conforms to the boundaries of the present HPBH WSA. Leaving it as it is in Alternative C seems to be an invitation for motorized or mechanized travel up onto the Gallatin Crest although it's hard to tell where exactly the boundary is intended in this Alternative.
  - b. Extend the Gallatin Crest RWA north so that it is contiguous with the Hyalite Creek Watershed. I would also like to see the upper portions of the East Hyalite Creek drainage (from the trailhead south) incorporated into the RWA. My reasoning here is that nowhere else within easy driving distance of Bozeman, may one easily hike into Wilderness. I realize mountain bikers claim this area but as more mountain bikers use this trail, it's going to be a pain in the butt to hike there.
  - c. Freeze the trail footprint in the HPBH WSA portion of the Hyalite Creek, East Hyalite Creek and Bozeman Creek watersheds.
  - d. Manage both the Bozeman Creek Watershed and the Hyalite Creek Watershed so as to ensure the best protection for this area that is critical to Bozeman's water supply.
  - e. Designate the northeast portion of the HPBH WSA (West Pine Creek area) as a Backcountry area with no motorized use and managed as Wilderness other than mechanized use. Recommend seasonal trail closures as necessary for wildlife protection.
  - g. The Buffalo Horn Backcountry Area as shown in Alternative C gives me heartburn as it drastically narrows the width of the RWA across the Gallatin Crest. I realize that motorized and mechanized use

has been allowed there for a number of years so this might be an area where there has to be some compromise. This is an important wildlife area. I would like to see Wilderness recommended for the area east of the Big Sky Snowmobile Trail which would encompass both Porcupine and Buffalo Horn Creeks. There are apparently a number of non-system user trails in this area that should be removed.

h. Include in the RWA the Windy Pass Cabin and the areas around the communications sites on Eaglehead Mountain and Ramshorn Peak.

#### Bridger Mountains Geographic Area.

1. The Bridger Range is an important playground for nearby Bozeman and as such it gets a lot of use. It also is an important wildlife area and corridor potentially linking the Yellowstone Ecosystem to the Big Belts and Rocky Mountain Front.
2. Recommend managing to prevent further permanent intrusion of roads into these mountains.
3. Consider RWA in the northwest IRA of the range, around the Blacktail Mountain area.

#### Crazy Mountain Geographic Area.

This is a unique mountain range with unfortunate checkerboarding, access issues, and meddling politicians.

1. Recommend continued attempts to improve access and reduce checkerboarding.
2. Recommend RWA designation of as much of the Crazy Mountains as practical.
3. Recommends listening to the Tribes about their concerns for this important area and following their recommendations for protection as much as possible.

#### Pryor Mountains Geographic Area.

The Pryor Mountains are another unique area with “exceptional biological diversity” “rich in species and community diversity with more than 400 plant species” (quoted from Proposed Action). As such, they deserve the highest level of protection possible.

1. Expand Lost Water Canyon RWA to include Crooked Creek (approx 13,000 acres total)
2. Recommend the three Backcountry Areas as shown in Alternatives B and C (North Pryor, Bear Canyon, and Punch Bowl) be converted to

Recommended Wilderness Areas. I realize these are not IRAs but there are virtually no roads and with motorized travel prohibited, they would seem appropriate for Wilderness designation.

3. Coordinate with the BLM and Bighorn Canyon National Recreation Area to create a vision and management policies that are consistent among all three agencies.

4. Otherwise no change in the current motorized and mechanized footprint in the Pryors.

Wild and Scenic River designation.

There are a number of streams and rivers in the Custer Gallatin NF that should be eligible for and benefit from the protection National Wild, Scenic, or Recreation designation would provide. I will refer you to the American Rivers proposal for a more complete listing of waterways appropriate for protection.

Thank you for your consideration and I look forward (I think) to the next phase in this planning process.