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Comments:

My name is Richard Lyon. I have lived in Gallatin County since February 2012 and before moving here was a frequent visitor to Bozeman, Big Timber, Livingston, Gardiner, West Yellowstone, and Yellowstone National Park. I have hiked, fished, skied, and backpacked in the Custer Gallatin National Forest since before the two Forests were combined. Over the past twenty years I have spent many weeks as a backcountry volunteer with various organizations that perform trail maintenance and related service work, often in the Absaroka, Gallatin, and Madison ranges.

1. I ask the Forest Service to consider very seriously and adopt the Gallatin Forest Partnership Agreement [GFPA], much of which is embodied in Alternative C. This compromise proposal reflects a collaborative solution reached by local groups with different - often sharply different - beliefs and objectives, after many hours of good faith discussions. This sort of effort, I believe, offers the best way to address the conflicting values and beliefs sincerely held by citizens and Forest users.

I have long been a believer in collaboration and consensus, having participated for fifty years in various Quaker organizations and as a professional mediator in civil litigation. From 2012 through 2015 I served on the governance committee of the Gallatin Community Collaborative, another citizen-initiated group of concerned individuals of diverse interests. Collaboration can be tedious, time-consuming, and highly frustrating. Consensus may often difficult to achieve. But the end product reflects listening to, understanding, and respect for everyone and their diverse points of view. It is as close to a truly community solution as is possible to achieve.

Support for the GFPA as something all can live with should not be taken as simply one comment or one viewpoint. As a comprehensive solution collaboratively arrived at by diverse groups, it deserves the highest level of attention. Not honoring it as such will discourage future collaborative efforts.

2. The GFPA also deserves approval on its merits. In particular:

a. All areas recommended for Wilderness designation are deserving of protection as Wilderness and should be managed as Wilderness, with this provision expressly included in the Forest Plan. If designated Wilderness by Congress the heart of the Gallatin Crest will be preserved for future generations of Montanans and the many people from around the world who visit our corner of the world to experience them.

b. No areas now open to motorized or mechanized recreation under the Travel Plan in place will be closed to such activities should Alternative C be adopted. GFPA and Alternative C in fact propose a new biking trail in the Pine Creek area. The Forest Service can manage future snowmobiling and mountain biking use consistently with the new Forest Plan through Travel Planning or sponsoring appropriate legislation.

c. Because the GFPA represents a reasoned and reasonable balance between Wilderness protection and recreational use, it stands the best chance of achieving the support necessary for the federal legislation required to preserve permanently any area as Wilderness. While strictly speaking not a criterion for Forest Planning, the Forest Service must recognize the political realities.

3. As I read the draft Forest Plan there is no specific Wilderness management plan for either existing Wilderness [Lee Metcalf and Absaroka Beartooth] or the areas to be designated as Recommended Wilderness under the new Forest Plan. Upon adoption of a new Forest Plan the provisions in the 1987 Forest Plan will be superseded; they should be replaced by updated provisions for proper Wilderness management. For maximum efficacy and direction to later travel planning these should be included in the Forest Plan. Alternatively the Forest Plan should specify a hard deadline for implementation of such Wilderness plans immediately following the Final Plan Decision.

New Wilderness plans in the Forest Plan should be specific and designed to maintain and promote the five statutory qualities of Wilderness in each discrete Wilderness and recommended Wilderness area. In particular the Forest Plan should make clear as a standard in the Forest Plan that all mechanized uses are incompatible with Wilderness, preemptively and definitively squelching any later promotion of allowing mountain bicycles in Wilderness.

4. Separately, I recommend designating several additional waterways as eligible for Wild and Scenic status [see Table 27, page 128] and adding certain Outstandingly Remarkable Values to those designated in the Proposed Action. I make these recommendations based upon visiting and fishing these waters over the past thirty years.

Waterway	Location	ORV	Classification
East Boulder River	Absaroka Beartooth		F, R, W Recreational
East Fork Mill Creek	Absaroka Beartooth		F, S, W Wild, Scenic
Grayling Creek	West Yellowstone		F, S, W Scenic
Lower Deer Creek	Absaroka Beartooth		F, S Recreational
Sixmile Creek	Absaroka Beartooth		F Recreational
Sweetgrass Creek	Crazy Mountains		F, R, S Recreational
Taylor Fork	Gallatin	F, W	Recreational
Madison River [Beartrap]	Madison	F, R, S, W	Recreational

5. Though I am not personally familiar with the waterways listed below, for the reasons stated in paragraph 1 above, I also urge that the waterways proposed by American Rivers/Montanans for Healthy Rivers and endorsed by the GFP be declared eligible for Wild and Scenic designation:

Bear Creek, Beaver Creek, Black Canyon Creek, Buck Creek, Buffalo Creek, Cherry Creek, Hellroaring Creek [Absaroka Beartooth], Hellroaring Creek [Madison], Hilgard/Sentinel Creek, Porcupine Creek, South Fork, Madison River, Spanish Creek, Teepee Creek, and Tom Miner Creek

Respectfully submitted,

Richard Lyon