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Comments:

I have fished and hiked on the federal public lands of Montana every year since the late 1970s. In connection with doing so, I have spent many thousands of dollars in local Montana communities. The public lands of the United States are of incalculable recreational and economic value. Those lands, including the GNF, should be managed so that this value is sustainable and undiminished far into the future. I recommend the following for the new Custer Gallatin Forest Management Plan.

The Lionhead (Henrys Lake Mountains)

The Lionhead area is characterized by outstanding natural beauty and sweeping views. This is the only place in the Custer Gallatin where the Continental Divide National Scenic Trail passes through. The Lionhead provides a range of habitat types from sagebrush to lush riparian areas to high alpine basins. It provides habitat for grizzly bears, moose, westslope cutthroat trout, elk, lynx, and sage grouse. It provides a critical link between the Greater Yellowstone Ecosystem and the High Divide.

Comment: The Forest Service should maintain the existing 22,800 acres of recommended Wilderness in the Lionhead, reflected in the no-action Alternative A. This area should be managed to allow foot and stock travel only, so that it may one day be eligible for congressional Wilderness designation.

The Gallatin and Madison Ranges

From the cascading waterfalls and lush creek bottoms of Hyalite to the breathtaking views along the Gallatin Crest, this area is one of the most spectacular places in the CGNF. At the heart of the Gallatin Range is the 151,000-acre Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (WSA). Lying between Yellowstone National Park and the Lee Metcalf Wilderness, this corner of the Greater Yellowstone Ecosystem is one of the few places left in the Lower 48 with nearly the full complement of species that were here 200 years ago when Lewis and Clark made their journey west. Among the species the Gallatin Range supports are grizzly bears, moose, mountain goats, wolverines, and the occasional lynx. Portions of the Gallatins also provide critical winter range for elk, bighorn sheep, and other big game. It's also an essential source of clean water for nearby towns, a recreational mecca, and a place for the residents of some of Montana's fastest growing communities to find solitude.

Comment: The Forest Service should implement the Gallatin Forest Partnership agreement, which is reflected in Alternative C. The Forest Service should recommend Wilderness for 102,000 contiguous acres between Yellowstone National Park and Hyalite Peak, ensuring north-south connectivity. The proposed area encompasses the entire Big Creek drainage, Rock Creek, and Tom Mine basins - all of which include a diversity of lower elevation habitat popular with grizzly bears. The GFP agreement also urges the Forest Service to recommend Cowboy Heaven and Quake Lake in the Madison Range as additions to the Lee Metcalf Wilderness Area. In total, the Forest Service should recommend Wilderness for over 124,000 acres in the Gallatin and Madison Ranges.

The Crazy Mountains

The Crazy Mountains are known for their stunning lakes and alpine peaks. The 83,000 roadless acres managed by the Custer Gallatin National Forest provide ample opportunities for solitude and primitive recreation. Montana hunters cherish this area for its outstanding elk and mountain goat hunting opportunities. The area also provides vital habitat for Yellowstone cutthroat trout, grizzly bears, and lynx.

Comment: The Forest Service should manage the Crazies to protect their wilderness values and their cultural significance to Indian peoples. No expansion of motorized or mechanized trails should be allowed. The Forest

Service should manage the area in close consultation with the Crow Nation in order to protect and honor Crow reserved treaty rights and traditional cultural practices.

#### The Pryor Mountains

The Pryor Mountains are a critical piece of the Apsáalooke peoples' traditional and contemporary homelands. The Pryor Mountains are as unique as they are wild. These mountains represent a truly one-of-a-kind convergence of three separate and distinct ecoregions: the Middle Rockies, Wyoming Basin, and Northern Great Plains. This confluence results in a biodiversity hotspot. The Pryors are home to many plants and animals found nowhere else in Montana, often representing the northernmost reach of their range, as well as species that are found nowhere else in the world. These uplifted limestone plateaus, featuring numerous caves and canyons, rise from the driest region in Montana and yet hold year-round snowfields atop Big Pryor.

Comment: The Forest Service should protect the wild character and cultural significance of Bear Canyon, Big Pryor, and the Punch Bowl areas in the Pryor Mountains by managing them as recommended Wilderness, as reflected in Alternative D. The existing Lost Water Canyon Recommended Wilderness area should be expanded to 13,000 acres, also reflected in Alternative D. These four areas are not suitable for motorized recreation and mechanized recreation, both of which degrade the wilderness quality of the areas and threaten irreplaceable cultural values.

#### Absaroka-Beartooth Area

The Absaroka-Beartooth Wilderness is, in the words of Lee Metcalf, "this magnificent primeval expanse of nearly a million acres. a land of jewel-like lakes, clear cold streams, and picturesque waterfalls." Surrounding Absaroka-Beartooth Wilderness are several roadless areas that have Wilderness-worthy qualities.

Comment: The Forest Service should protect all existing recommended Wilderness areas adjacent to the AB and should additionally recommend the following areas as reflected in Alternative D: West Woodbine, East Rosebud to Stillwater, Red Lodge Creek, Chico Peak, Emigrant Peak, and Dome Mountain. Bad Canyon should be managed as a Backcountry area with no mechanized and motorized recreation as proposed in Alternative B.

#### Ashland Ranger District

The Ashland Ranger District is the largest contiguous block of land managed by any federal agency in eastern Montana. The Sioux, Crow, and Cheyenne peoples all have historic ties to this part of the forest. The Ashland District is also deeply connected to Montana's cattle drive history, and to this day boasts one of the largest cattle grazing systems in the nation. Characterized by bright red sandstone hills, thick stands of ponderosa pines, and open meadows of sage and beautiful wildflowers, this district is important wildlife habitat. In addition to being a backbone of the local cattle grazing economy, three areas -- the Tongue River Breaks, King Mountain, and Cook Mountain -- are roadless and have been managed for their primitive foot-and-hoofstock opportunities alongside thoughtful grazing for the last 30 years.

Comment: Tongue River Breaks, King Mountain, and Cook Mountain should be recommended for wilderness, thereby protecting the incredible natural landscapes and indigenous cultural values, while still allowing ranchers to administer essential components of their grazing permits.

#### Sioux Ranger District

The Sioux Ranger District is comprised of eight small parcels on the prairies of far eastern Montana and northern South Dakota. These areas are all characterized by impressive sandstone outcroppings and stands of pines rising dramatically out of the surrounding prairies. The area is rich in archeological and paleontological resources and offers many opportunities for solitude. Chalk Buttes, in particular, provides unique and rewarding hiking opportunities that are unique in the far southeastern corner of Montana.

Comment: This area should be managed as a "backcountry area" prohibiting motorized and mechanized recreation, as reflected in Alternative D.

#### Management of Recommended Wilderness

Comment: Recommended Wilderness areas (RWAs) should be managed to protect their wilderness character and the potential for Congressional designation in the future. RWA management can also improve the wilderness character of an otherwise outstanding area, so that it may qualify for future designation. This means allowing foot and horse travel only. Recreational uses that do not conform with the

Wilderness Act -- such as mountain biking, snowmobiling, OHV riding, and other mechanized and motorized uses -- are not allowed.

The Forest Service should adopt clear standards that prohibit non-conforming uses in RWAs.