

May 31, 2019

**Subject: Submission of Comments
Draft Revised Forest Plan and Draft Environmental Impact Statement
Custer Gallatin National Forest Plan Revision**

Below are my current comments on the above referenced documents. I have previously submitted comments on the Proposed Action Plan Revision #50185, accepted as letter ID 50185-2289-766, and wish to include those comments by reference with this submission of additional comments.

Opening Remarks

Thank you for providing the opportunity to comment and for the good job the Forest Service (FS) has done in publicizing and holding community outreach and information sessions associated with the Forest Plan revision.

I have been a user of national forest lands for six decades and consider the opportunities provided by our national forests to be among the most treasured of all the benefits provided by our nation. Some of my earliest memories are of family camping and hunting trips in national forests – memories cherished to this day. My character and lifestyle have been shaped by a lifetime of various activities on a number of forests, including the Custer Gallatin (CGNF), which has been my backyard forest for the last decade. I have enjoyed hiking, camping, fishing, mountain biking, floating, ATV riding, trail running, skiing, photography, solitude, inspiration and fellowship while visiting the CGNF.

However, I don't limit my appreciation of the benefits provided by the CGNF to my personal recreation, which are minor in comparison to the larger societal benefits that include the protection of watersheds, wetlands, water quality, air quality, soil, wildlife habitat, endangered species, ecosystem diversity and the opportunity to experience Wilderness. As a former long-term employee of a forest product company, I also recognize the valuable contribution that sustainable forest management and harvesting play in our economy. Past experiences with Native American cultures have enhanced my appreciation of the cultural and spiritual significance of certain landscapes. All of this is to say that I think I approach the opportunity to comment on the CGNF Plan with a broad perspective and sensitivity to the demands placed upon our national forests and the multiple use mandate under which they operate.

I offer my comments with significant concern over the rapidly growing population of the Gallatin Valley and surrounding areas and the anticipated increase in demands on the resources and opportunities of the CGNF. A growing user base, coupled with the inevitable development of new machines and means of traveling farther and faster will have more impacts to the soil, water and wildlife of the CGNF.

We are now blessed with CGNF lands that exhibit wilderness characteristics sufficient to merit their designation as Recommended Wilderness Areas (RWA's) or Wilderness Study Areas. Some of these lands are temporarily protected by current designation, others by remoteness, such that those wilderness characteristics have persisted. However, increasing population, recreational use, resource monetization demands and political posturing will overwhelm these areas absent protection afforded by RWA designation and subsequent management to exclude uses that may degrade wilderness characteristics. Let's preserve and protect these deserving areas as they are now, for the benefit of our future generations. One of my dearest wishes is that my grandchildren will have the opportunity to enjoy a range of wilderness experiences across the GCNF. If we err, let's err on the side of designating too much wilderness, setting aside too many acres for wildlife, watershed, air quality, soil protection, cultural and historic values, solitude and quiet recreation. We won't likely get another chance.

Designations: Gallatin and Madison Ranges

I urge the FS to adopt the agreement reached by the Gallatin Forest Partnership (GFP) for the Gallatin and Madison Ranges. The GFP agreement was reached only after years of collaboration with many diverse users and represents a realistic path forward to minimize conflicts among recreational groups and has the broad public support necessary to achieve future legislative support for a Wilderness designation where recommended by the GFP. While I would love to see even more RWA designations than recommended by the GFP, I don't think such an outcome is feasible today given the mechanized and motorized user base and practices that have become established over the past several decades. This lost opportunity should serve as a lesson to us now as we decide what degree of protection to apply to different landscapes – future choices are almost always more limited and less protective than current choices.

It is especially important to recognize the GFP agreement includes RWA designation for several lower elevation areas, including the entire Big Creek drainage, Rock Creek and Tom Miner Basin, providing diverse habitat for grizzly bears and other species. The agreement also recommends the RWA designation for the Cowboy Heaven and Quake Lake areas adjacent to different units of the existing Lee Metcalf Wilderness Area.

Also note that the GFP agreement contains a clear direction to protect wildlife and wildlife habitat in its recommended Back Country Areas of Buffalo Horn – Porcupine and West Pine, similar to the management goals of the Cabin Creek Wildlife Management Area in the Madison Range. Monitoring the impact imposed on these values by recreational use is very important, along with the ability to apply adaptive management strategies to respond to any adverse impacts.

In recent years I have seen a large increase in trails constructed or re-opened by the FS for motorized and mechanized use in the Wheeler Mountain - Little Bear area of the forest. Expanding motorized and mechanized opportunities in these front country areas where impacts from timber harvesting and extensive road building are present is the best way to meet growing demand from these user groups, when necessary.

Designations: Lionhead - Henrys Lake Mountains

The existing 22,800 acres of RWA should be maintained in the Lionhead. And consistent with sound policy and the text of Alternatives C, D and E of the DEIS, all RWA's should be managed to exclude motorized and mechanized travel. A future Wilderness designation for this area is the best way to protect its range of habitat types and the wide variety of important species that use this area or that pass through this critical link between the Greater Yellowstone area and the mountains and valleys to the north and west.

Designations: Crazy Mountains

Some of the most spectacular terrain and landscape features of the CGNF can be found in the Crazy Mountains. This iconic island range deserves the special attention recommended by those with a unique connection to this landscape, the Crow Nation. The challenges presented by a checkerboard pattern of ownership and the existence of subsurface rights (which may or may not be active or viable from an economic or logistical perspective) should not be viewed as unsurmountable obstacles to the designation and management of RWA's in the Crazies. These management challenges can be overcome. The Crazies offer numerous opportunities for solitude among the spectacular peaks and alpine lakes and vital habitat for threatened and endangered species. I recommend no expansion of existing motorized and mechanized trails and close cooperation with the Crow Nation to develop a better understanding of the cultural and spiritual significance of this area. The use of Backcountry Area designations in the Crazies should be accompanied by a primitive recreation setting.

Designations: Absaroka-Beartooth Mountains

People all over this nation recognize the A-B Wilderness and its importance to the overall health and viability of the Greater Yellowstone Ecosystem. It is among the most recognized Wilderness Areas in the nation, and for good reason given its soaring peaks, scores of alpine lakes, extensive alpine zone and diverse wildlife. Yet surrounding the A-B Wilderness are additional areas also with wilderness characteristics, many at lower elevations providing an important habitat zone, that are not adequately protected. The FS should move to designate as RWA's the areas of Red Lodge Creek, West Woodbine, East Rosebud to Stillwater, Chico Peak, Emigrant Peak and Dome Mountain.

Designations: Pryor Mountains

The Pryors also are of special significance to the Crow Nation and are perhaps the most unique portion of the CGNF. As such, this area deserves more comprehensive protection of its cultural heritage, biodiversity, geologic features and uncommon habitats. Bear Canyon, Big Pryor and the Punch Bowl areas all deserve protection as RWA's. The Lost Water Canyon RWA should be expanded to 13,000 acres. These recommendations are consistent with Alternative D in the DEIS, and I believe most all current motorized and mechanized trails would not be impacted by this designation. It is important to note that the unique landscapes and ecosystems common in the Pryor Mountains are underrepresented in the National Wilderness Preservation system – this is a great opportunity to build more diversity into our national Wilderness inventory.

Designations: Ashland Ranger District

Continued limitation of motorized use in the Tongue River Breaks, Cook Mountain and King Mountain areas is warranted, and excluding mechanized travel in these areas would help preserve existing wilderness characteristics.

Designations: Sioux Ranger District

The designation of Backcountry Area for the Chalk Buttes and Capital Rock areas would be appropriate, and applying a primitive recreation setting that would limit mechanized and motorized travel would provide further protection for these unique geologic formations.

General Comments

Wilderness Management and Travel Plans

I encourage the FS to make a commitment now to update these Plans as soon as practicable after the Forest Plan is revised. The CGNF has seen the confusion and experienced the litigation that can arise from improper or outdated Travel Plans. Updated wilderness management plans will help the FS better evaluate the impact of steadily increasing use of our Wilderness Areas and to take appropriate steps to mitigate those impacts such that wilderness character is maintained or enhanced. New wilderness plans should clearly define management strategies to maintain wilderness character and thresholds that identify when unacceptable changes are occurring.

Management of Recommended Wilderness Areas (RWA's)

Thank you for making the commitment under Alternatives C, D, and E to manage RWA's to protect wilderness character and the potential for future Wilderness designation, prohibiting nonconforming uses. Although achieving this objective on the ground will require monitoring and enforcement, it is a critical component of the RWA designation and should not be violated. Applying the primitive recreation setting and adopting a standard for all RWA's that prohibits mechanized and motorized travel will help accomplish this goal.

Management of Backcountry Areas (BCA's)

The BCA designation should not be the first choice of the FS when deciding how to manage areas that otherwise qualify as RWA's or that could be enhanced by management practices such that they may qualify for future RWA status. A BCA designation without carefully described and consistently applied conditions seems to allow too much discretion on the part of local managers, especially over long time periods and with changes in personnel, and they may be hard for the public to understand and comply with, especially if the use of mechanized and motorized travel is not specifically addressed. Nevertheless, the BCA designation may be useful tool for some areas that deserve high levels of protection but may not be suitable for RWA status.

Monitoring and Adaptive Management

This aspect of the Plan is key to its ultimate success as a guiding tool for future management decisions and actions across the CGNF, and as such, it should not take a back seat to other components of the Plan. Given this Plan may be in place for decades, it is imperative that the FS build and commit to conducting a comprehensive monitoring plan that will produce actionable data for adaptive management decisions. We cannot accurately predict what the future may bring to the forest in terms of new and increased user demands and machines, changing climate, wildfire, forest health, legislative actions, demands for water, minerals, oil and gas, best available science, endangered species and a host of other uncertainties and risks.

What may be most certain is the FS is likely to be hard pressed to have adequate resources to conduct and react in a timely manner to the monitoring needs of any revised Plan. I wonder if there is an opportunity to build into the monitoring plan some flexibility to perhaps leverage outside resources, e.g., local organizations and volunteers working under the direction of FS employees, in support of robust and timely monitoring? The future need for adaptive management is also a certainty, and being able to objectively measure the success of the Plan components in producing desired outcomes is an essential first step of that process. New ideas and methods as to how to cost effectively conduct monitoring and identify adaptive management needs should be investigated and deployed if feasible.

Assuming that the Monitoring Plan section may be the appropriate place for comments related to enforcement of user restrictions on trails and roads, this is a management duty that needs additional support and emphasis, at least in the Gallatin Range and I suspect the problem may be Forest-wide. On more than one occasion I have seen motorcycles bouncing across the alpine meadows near Windy Pass, and user-created bike and other trails seem to be proliferating in multiple areas. My guess is that resources and budget restrictions hamper the FS's efforts to combat this problem, but it must be more appropriately addressed. The monitoring plan should include an active assessment of this continuing problem and some change in management focus will be necessary to adequately address it. Not only does it damage the resources of the forest, its existence seems to encourage the FS to avoid placing appropriate designations, such as RWA or use restrictions, on certain areas because they anticipate problems managing those areas due to the lack of compliance with travel restrictions. In other words, the problem is greater than the potential damage and disturbance done by misuse in the first instance; its prevalence tends to influence management decisions that should instead be based on other, natural characteristics of the landscape. Again, perhaps there are more efficient enforcement mechanisms or outside resources that could be used in support of a more effective outcome.

Thank you for taking my comments and for all the good work you do for our public lands.

Tom Ross

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