

Congratulations on our job well done! Revising a forest plan is a huge undertaking that your team has accomplished well. I respectfully submit the following suggestions to your draft:

### **Congressionally Designated Wilderness**

This is a critical section of your plan since nearly 35% of the Custer Gallatin National Forests fall within this management area. Since draft Absaroka-Beartooth and Lee Metcalfe Plans have been drafted, I suggest first and foremost that those plans be finalized. They will provide the long-term specific direction these areas deserve. Consider including an objective that the new draft Absaroka Beartooth and Lee Metcalf Wilderness Management Plans be completed and implemented within 2 years of the Forest Plan Decision.

Consider writing desired conditions for each of the five qualities of wilderness character. These have been defined clearly and organizing your desired conditions around these qualities will ensure all qualities are protected.

Goal 04 on page 115 needs to be tightened up. Recreational fisheries management needs to be constrained by the wilderness plans to highlight restoration of native fish, and only in those areas with historic stocking, no expansion unless it can be shown it is the only viable way to ensure the longevity of a threatened or endangered species.

Include a stand alone **standard** that prohibits bicycles in wilderness. This will head off any future attempts to open Wilderness to bicycles which is a continued threat.

Under guidelines, the no net gain in trail miles is dangerous because there may be instances where a significant trail re-route that will improve and protect wilderness character may add significant trail miles. Suggest that be rewritten.

The language under untrammelled for each Zone narrative absolutely need to be strengthened. With climate change there will be an increase in proposals to manage and manipulate vegetation, fisheries and wildlife. Consider language such as, *"Any management within this zone preserves the wildness of the area and maintains or improves natural integrity and the function of the natural ecosystem. Indirect methods of accomplishing management objectives predominate."*

Consider adding a Standard related to restoration projects. Proposed language is, *"Ecosystems restoration projects will rely on natural processes to maintain ecosystem function, whenever possible. Where human activities have altered natural conditions, active management may only be considered through a MRA in conjunction with the Framework for Evaluating Ecological Intervention (Landres and Hann, 2017) to determine the project is the minimum necessary for the administration of the area as wilderness."*

### **Recommended Wilderness**

I support Alternatives C and D that prohibit motorized and mechanized recreation in recommended wilderness.

I support Alternative D for the Crazy Mountains. The Crazy Mountains Roadless Area is sacred to the Crow Tribe and has outstanding wilderness qualities.

