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Mary Erickson, Forest Supervisor Custer Gallatin NF
Attention: Forest Plan Revision Team
PO Box 130
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Dear Forest Plan Revision Team:

Thank you for considering the following comments on the Custer Gallatin Draft Forest Plan and DEIS.

Draft Revised Forest Plan, 2.4.36 Designated Wilderness

General Comments

- It is exciting to see decades worth of hard work by wilderness managers on the Custer Gallatin finally being incorporated into the Forest Plan. The zones presented in this draft are solid, the polygons presented on the maps in Appendix A of the DEIS are thoroughly researched and accurate representations of logical divisions (based on decades of on-the-ground monitoring) of the 3 wilderness zones. The Desired Condition narratives by zone largely capture the intent and spirit of each zone.
- There is a critical difference between the energy that the Custer Gallatin needs to place on wilderness in the revised Forest Plan and other recent Region 1 Forest efforts. The current (as appended to the 1987 Gallatin Forest Plan) Absaroka Beartooth and Lee Metcalf (AB/LM) wilderness plans are so dated as to provide little contemporary management guidance. These will go away entirely when the new Forest Plan is published. Therefore, the new Forest Plan (FP) must be robust enough to provide appropriate guidance to protect wilderness character in the interim, and provide clear sideboards upon which to complete the revised wilderness plans.
- I urge the Forest include an **objective** in Final Forest Plan Wilderness Section directing that the draft Absaroka Beartooth and Lee Metcalf Wilderness Management Plans be finalized under a separate NEPA decision and implemented within 2 years of the Forest Plan Decision. With appropriate overarching framework language included in the Final Forest Plan for wilderness, completing the individual wilderness management plans should be a simple NEPA project tiering to the recent decision, but a critical step. Without this step, the metrics and critical sideboards in the form of specific standards tied to individual qualities to guide wilderness managers and line officers in

their decision making is critically lacking. The on-the-ground toolbox wilderness managers need for day to day decisions clearly should live in the yet to be finalized wilderness plans. The Forest has a nearly complete proposed action for revised wilderness plans on file.

- When language for “suitability” on page 116 of the Draft Plan states that an area (e.g. recommended wilderness and designated Wilderness) is not suitable for mechanized transportation, does that carry the same weight as a standard that says they are not permissible? If not, the Final Forest Plan **should include a standard in the Final Plan that prohibits motorized/mechanized travel in Designated Wilderness, specifically bicycles**, to pre-empt any loss of wilderness character by non-conforming uses, or national pressure to allow bicycles. This could save a lot of effort in the future.
- In each description of the desired condition for wilderness zones beginning on page 117 of the Draft Revised Plan, the Untrammelled desired condition language is insufficient to ensure that managers exercise an appropriate level of management restraint and humility to ensure that the intent of the Wilderness Act is served. **The language about the untrammelled quality needs to speak to agency actions (or more precisely lack of action!), not natural conditions.** Nor do the descriptions of desired condition appropriately separate the progression of management constraint or increasingly robust potential management actions by the Forest Service or sister Agencies. With ever increasing threats to wilderness, trammeling actions will be more and more tempting by the Forest and sister Agencies. Under the Untrammelled header for each zone I suggest the following desired condition language:
 - Zone I – Any management within this zone preserves the wildness of the area and maintains or improves the natural integrity and function of the ecosystem. Indirect methods of accomplishing management objectives predominate.
 - Zone II - Management actions emphasize sustaining and enhancing the natural ecosystem in this zone, as it may be easily impacted. Cooperative management of native fisheries and wildlife with MT Fish Wildlife and Parks emphasize continued provision of recreational fisheries at popular **historically** stocked sites, with restoration of native species as appropriate.
 - Zone III - Management emphasizes sustaining and enhancing the natural ecosystem. Management is often direct, and management presence to minimize impacts from visitors is more noticeable. Management actions may be more prevalent which affect the untrammelled nature of wilderness to restore naturalness of native fish, wildlife, vegetation (e.g. management of noxious weeds), soil or water. Recreational fisheries are managed (stocked where necessary) by Mt Fish Wildlife and Parks at popular lake destinations that were stocked pre-designation to enhance fishing opportunities, with focus on restoration of native fish species.
- I appreciate the addition of standards and guidelines made between the proposed action document in 2018 and the DEIS/Draft Plan. I’ve done quite a

bit of thinking about those standards and have some discrete suggestions. Finding the balance point between the appropriate Forest Plan level standards and those that should more appropriately live in the revised wilderness plans is tricky, and I appreciate the Forest's dilemma. Standards that are likely to stand the test of time through the Forest Planning period, (for example: **"There shall be no system trails constructed in Zone I"**, clearly are appropriate Forest Plan level direction. I also think that standards and guidelines that describe physical parameters of resource conditions like campsite impacts and densities are appropriate to include in the Final Forest Plan, these will not likely change during the life of the Forest Plan. The Forest has been monitoring campsite condition and density against draft standard language for years, **I strongly believe those standards and guidelines (those definitions are on file with the Wilderness Program Manager) should be included in the Final Decision.** If standards and guidelines that describe the physical parameters of acceptable resource damage are included, the only standards that would need to be addressed at a future date in updated wilderness management plans would have to do with managing people's behavior, like party size, group encounters, etc. Standards tied to resource conditions are not likely to be controversial, but rather accepted science. The draft standards on file with the Supervisor's Office are based on decades of monitoring, and should be added to the final Forest Plan. Standards that constrain recreation behavior may be more challenging.

Standards and guidelines that may need to be changed during the life of the planning period to address accreting threats (human or otherwise) to wilderness character (e.g. site specific stock closures, party size limitations, site specific camping restrictions, numbers of acceptable social encounters by zone) probably more appropriately should be in the wilderness plans, where they could more easily and nimbly be revised than by amending a Forest Plan. That said, if there is no reasonable hope that the wilderness plans can be finished and implemented in short order, it's probably best to keep those standards listed in the Draft Forest Plan intact, with the addition of the time tested standards on file with the agency that define acceptable resource conditions that were omitted.

If the standards are kept as written in this Draft, I suggest you consider dropping the party size in the East Unit of the Absaroka Beartooth to 8 people, and also in the Spanish Peaks and Taylor Hilgard Unit of the Lee Metcalf. Ever increasing urban pressures are quickly making opportunities for solitude more difficult in these 3 areas, larger groups contribute to more evident resource damage, it would be better to set a more realistic party size now. Leaving party size at 15 people in the West Unit of the AB will minimize friction with currently permitted outfitters. You should include a map of the delineations of the East and West Units of the AB in the final forest plan if standards differ between them.

Specific comments on FW-DC-DWA

- **DWA page 113** - The ecosystems restoration framework referenced in the third paragraph of page 113 is finalized and is posted on www.wilderness.net see:

<http://www.wilderness.net/toolboxes/documents/restoration/Supplement%20to%20MRA-MRDG.pdf> for the final reference. The Draft Revised Plan states this is a draft, *this is a mistake that should be corrected in the Final*. This thought process and documentation when the agency is contemplating undertaking ecosystems restoration projects is so critical to limiting trammeling and maintaining wilderness character, I believe it should be listed as a Forest Wide Standard, not simply introductory narrative.

- Under FW-DC-DWA page 113, I suggest pointing to the glossary of terms for definitions of the 5 qualities of wilderness, and including those explicit definitions there, or simply insert the definitions here. Landres et al, 2015 has provided these definitions for agency use:
 - Untrammeled—Area is unhindered and free from intentional actions of modern human control or manipulation.
 - Natural—Area appears to have been primarily affected by the forces of nature and are substantially free from the effects of modern civilization.
 - Undeveloped—Area is essentially without permanent improvements or the sights and sounds of modern human occupation, and it retains its primeval character.
 - Outstanding opportunities for solitude or a primitive and unconfined type of recreation—Area provides outstanding opportunities for people to experience solitude or primeval and unrestricted recreation including the values associated with physical and mental inspiration, challenge, self-reliance, self-discovery, and freedom.
 - Other Features of Value—Area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. Though not required of any wilderness, where they are present they are part of that area's wilderness character, and must be protected as rigorously as any of the other four required qualities.

I suggest organizing the Desired Conditions (FW-DC-DWA) section beginning on page 113 under a header for each of the 5 qualities listed above, like the zone descriptions. This will highlight the new national direction under wilderness stewardship performance (the agencies accomplishment requirements for wilderness) for focusing wilderness management discretely around the 5 qualities to ensure wilderness character is maintained. This organization structure will also dovetail with the required wilderness character monitoring baseline work which is also a performance target.

- Desired Condition Statement 07 on page 114 should read: "...primitive recreation, and **maintains** wilderness character".
- Goal 04 (FW-GO-DWA) on page 115 states: "The Forest Service coordinates with Montana Fish Wildlife and Parks on fish and wildlife restoration or re-introduction projects in wilderness in Montana and continued provision of recreational fisheries *at popular sites*(emphasis added)." **I believe the last part of this sentence is huge overreach.** Continued provision and management of recreational fisheries is clearly within MT FWP purview, but it is also within the Custer Gallatin's purview to provide wilderness guidance that constrains management of stocked fisheries to

“historically” stocked sites, not simply because sites are popular. Please see the current MFWP and Northern Region Cooperative Agreement for Fish, Wildlife and Habitat Management dated June, 2008 for specific direction, as well as the AFWA agreement. I suggest referencing this (or the most current version) of the MTFWP agreement along with this goal. This is a flash point nationally and I believe needs to be rewritten. I suggest: “...and continued provision of recreational fisheries **at sites that were historically stocked prior to wilderness designation.**” This clarifying language change may deflate an otherwise hot button issue. This goal should also consider adding language that favors stocking of native fish over non-native per the state cooperative agreement, where recreational fisheries are being managed.

- Standard 11 on page 115 states: “within wilderness zones 1, there shall be no *new* designated campsite for public use or assigned Outfitter Guide Camps.” There are currently no legally designated campsites anywhere in the Absaroka Beartooth or Lee Metcalf, you should strike the word “new”. The Standard should read: Within wilderness zone 1 there **shall be no designated campsites** for public use or assigned outfitter guide camps.
- I like FW-GDL-DWA guideline 01, but it needs to go further. Please include a Standard which states: **There shall be no system trails constructed in Zone 1.** This is clearly a Forest Plan level standard that is critical as distinguishing a key feature of the most pristine zone within the Absaroka Beartooth Wilderness and must be included in the Final Plan.
- Guideline 04 on page 116 of FW-GDL-DWA is awkward. I suggest a rewrite to that latter part of the sentence: “...prior to herbicide treatments” **so long as that pulling or hand tool treatment is effective at controlling the target invasive species.**
- Guideline 05 on page 116 is good, and will stop the never-ending debate about expanding outfitted uses in wilderness. It would still allow for shifting uses to more wilderness dependent and appropriate activities such as youth education, while stopping the perennial request for additional use.
- Please include a guideline that states mechanical treatment of vegetation will generally not be used.

DEIS Comments

- On page 724 , Chapter 3.21.2, header Effects from Fire and Fuels Management: the statement “The current plan’s fire suppression direction from the Custer Forest Plan is to contain, control and confine wilderness fires...” while this may be what the Custer Forest Plan States, the 1983 AB Fire Management Guidebook provided all units all options for fire management, but especially directs managers to adhere to the wilderness policies/directions for fire management – that plan superseded all forest plans for Custer, Gallatin and Shoshone NF. The AB Fire plan was again updated in 1989 after the 1988 fires, and clearly allowed for naturally caused fire within the Custer portion of the AB to be managed for resource benefits. The AB Wilderness Management Plan which was appended to both the Custer and Gallatin Forest Plans also allow for what was then called “prescribed natural fire” - wildland fire for resource benefits in today’s vernacular. The Custer portion of the AB has this critically important

tool now, though it is rarely utilized, and the paper trail needs to be corrected. This language is explained and clarified in the 2011 Gallatin Forest Fire Management Plan.

Thank you for the opportunity to comment. This section of the Forest Plan revision is a critically important step to shaping the management framework for 1/3 of the Custer Gallatin Forest. Crown jewels of the Wilderness Preservation System like the Absaroka Beartooth Wilderness deserve and demand concise well written guidance for future users and managers alike. The public and managers deserve to clearly understand what constitutes excellent wilderness stewardship, now is the time to bolster and improve this first draft. Please let me know if I can assist you in any way as you incorporate feedback on the depth and breadth of this portion of the Final Forest Plan. I am happy to help.

Sincerely,

Kimberly Schlenker