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Comments:

CGNF Wilderness Management

With more than a third of the Gallatin National Forest as designated Wilderness and the fact that the upcoming Forest Plan is likely to be in place for many years, it is critical that wilderness management direction for the Absaroka Beartooth (AB) and Lee Metcalf (LM) be specific, strong, and well-defined to provide appropriate guidance to sustain wilderness characteristics over decades and to prepare to for revisions needed to provide site-specific direction.

Unlike the Bob Marshall complex, Selway Bitterroot, or Anaconda Pintler where more recent wilderness plans include effectively defined management strategies to protect wilderness character and provide guidance for identifying when changes occur that are not acceptable, the AB and LM management plans lack such direction. The current AB and LM wilderness plans were amended to the 1987 Forest Plan. Unfortunately, when the 1987 Forest Plan is superseded by the new Forest Plan, the AB and LM wilderness management plans will no longer exist. This omission must be addressed to provide strategies essential to sustain and enhance wilderness character. Rather than providing more discrete wilderness direction in the Forest Plan itself, a better solution would be to include this direction in wilderness management plans where updates and improvements are more easily made.

Recommendation: To remedy the lack of suitable wilderness management plans for the AB and LM, I recommend that the Forest Plan Wilderness Section include a mandate for new draft Absaroka Beartooth and Lee Metcalf Wilderness Management Plans to be completed and implemented within two years of the Forest Plan Decision.

Below are suggestions for improving 2.4.36 Designated Wilderness (DWA) in the draft Forest Plan.

#### 2.4.37 Absaroka-Beartooth and Lee Metcalf Wilderness by Zone

Desired Condition: Zone 1(Pristine): Add a standard: There shall be no system trails within Zone 1. While Guideline 01, p. 116, is a start, a stand-alone standard is required to prohibit trail construction in Zone I.

Suitability (FW-SUIT DWA), p. 116. Add a stand-alone standard prohibiting bicycles in Wilderness. Rationale: This definition is needed to combat the continuing threat to allow bicycles in Wilderness. Particularly with the development of electric assist mountain bikes the line between mechanized and motorized is blurring.

Untrammelled (within each Zone, especially Zone 1): Include restrictive language indicating the management strategies within each zone must maintain or improve the natural integrity and function of the ecosystem. Rationale: This addition would guide and limit the agency from wildlife, fish or vegetation manipulation that may be inappropriate or ill-advised.

Goal (FW-GO-DWA), Goal 04, p. 115. The wilderness plans need to clearly state that restoring native fish is the goal of recreational fisheries management. There shall be no expansion of historic stocking unless that would be the sole viable option to ensure sustainability for a threatened or endangered species.

Examples of robust wilderness management plans are included the Sawtooth NRA draft wilderness management plan in the Cecil D. Andrus[ndash]White Clouds Wilderness, Custer County, ID: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd562690.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd562690.pdf) and the Draft Hemingway-Boulders and White Clouds Wilderness Management Plan Environmental Assessment: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd562689.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd562689.pdf)

In summary, a mandate to develop and implement new draft Absaroka Beartooth and Lee Metcalf Wilderness Management Plans needs to be included in the Forest Plan.