

Date submitted (Mountain Standard Time): 6/6/2019 9:40:56 PM

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Comments:

I would like it noted that I am for Alternative E in the Custer/Gallatin National Forest Travel Plan. I read an article from the Missoulian which I will refer to in this comment, as well as other articles from various sources, as it shows insightful and powerful reasons why wilderness should be designated as backcountry. I agree with the statement that Montanans (and I will add TRUE Montanans - many who call themselves Montanans now have come in from other states, claiming that they don't like what's going on in their own state, and want to come here to get back to God's country [maybe not using those exact words], but then they do exactly the opposite and try to bring in the same policies they supposedly left behind, to make our unique state similar to what they abandoned) want very few, if any (some areas want more than others), designated as wilderness. If you look at Table 2, concerning comparison of issues by alternative, Alternative D promotes the highest number of wilderness areas (39) and acres (711,425). The fact that, of the other 4 in all of the areas considered, there are 30 less areas (9) and 564, 870 acres less (146,555) than the second highest amount in Alternative C. In addition, Alternative C promoted the highest number of backcountry areas (12) to Alternative D's (1), and the greatest number of backcountry acres (252,896) to Alternative D's (5937). This says something about the mind of the people who have provided input for the plan up to this point.

The Wilderness Act of 1964 was created to preserve and protect certain lands "in their natural condition" and thus "secure for present and future generations the benefits of wilderness." The Act recognized the value of preserving "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." Congress therefore directed that designated wilderness areas "shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness."

9.1 million acres were designated as wilderness, and a "long-term study process for additional designations" was laid out at that time. The process begins with a study of federal lands, and the goal is to identify potential wilderness areas. After the President makes a recommendation to Congress, they can then follow through with the designation, release the lands from that designation or take no action. Once designated, the areas must be managed to preserve their wilderness character: No permanent or temporary roads, no use of motor vehicles, motorized equipment, motorboats, no landing of aircraft, no other form of mechanical transport and no structure or installation.

There are many reasons why wilderness is no longer a viable option for backcountry lands:

- 1) Our government funds are continually being cut to the point where resources are not adequate to perform the necessary functions needed for maintenance. For many years now, people traveling through forests by foot or whatever type vehicle, are exposed to the eyesore of both standing and fallen dead trees due to catastrophic wildfires, beetle-kill and other insect epidemics, laying all over the mountainsides and ravines, defiling and degrading the landscape. Because no mechanized or motorized equipment is allowed in wilderness, trail crews in wilderness areas have to use old-school equipment like crosscut saws rather than chainsaws. That means it takes more effort to maintain any given area. Efficiency and productivity are limited or lost in the efforts toward management and fiscal responsibility, not only in clearing trails, but in other areas of forest health, fire prevention and wildlife habitat enhancement.

A more feasible plan would be to allow a designation that would allow the FS to access backcountry areas with motorized small equipment and power tools, such as chainsaws, to clear out all that wood. Or, because of lack

of enough crews for so many large areas, wood permits for loggers or locals needing firewood could be issued, with the requirement that each permit is reserved for a specific area, which MUST be cleared of all dead wood inside the entire perimeter of said permit - until all areas are cleared. Areas where the dead trees have covered up large masses of land, destroying the chance for strong vegetation, could be replanted and provide ground cover to prevent erosion. In addition, all those trees are a terrible fire hazard, just waiting to happen. Even if there has been a prior burn, if another fire starts in those areas, there is so much fuel left over as to cause out-of-control fire storms, endangering Forest Service and wilderness lands, residential areas, firefighting crews, wildlife, etc.

Concerning a possible wilderness designation in her area, Ruth Hartzler of the Carolina Mountain Club agrees with excluding Bald Mountain, simply because designating that area would keep trail maintainers from using power tools on the portion of the Appalachian Trail that runs through it. "There are areas around the Appalachian Trail that we would request not be wilderness, at least not right where the trail goes, so that our trail maintainers can be efficient in maintaining the trail, but in general we do support wilderness designation," Hartzler said. This is another issue - those in favor of wilderness often support it as long as it doesn't negatively affect or inconvenience them.

2) Backcountry areas retain the same pristine characteristics as wilderness, but have the ability to allow more people to use and enjoy it through specific designations of different areas. This enables different smaller sites to be created having distinct functions compatible with the various needs of the American people without compromising the primitive nature of huge parcels of land. As stated in the Multiple Use and Sustained Yield Act of 1960, Section 4a, "Multiple use" means: The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

The current, greatest demand for public lands is for recreation of all forms. There is a whole generation of Americans that are growing older and looking for viable alternatives to Wilderness that are friendlier to the majority of the recreating public. Wilderness designation thus becomes a poor choice. The beloved family outing by car to view the beauty of the mountains, and everything that is a part of that experience, is included in the prohibition of motorized and mechanized recreation. Backcountry areas provide a very valuable resource for recreational activities that allow people to experience and enjoy natural appearing landscapes. They provide opportunities for people to escape from the pressures of large crowds and the more developed world. This can include use of ATVs and off-highway motorcycles, hunting, snowmobiling, fishing, hiking, bicycling, horseback riding and 4-wheel driving. Alternative E would provide the protection the public demands for backcountry areas, but also allow it to be used and enjoyed by the public. There can be a backcountry area that allows the tools the agencies need to manage the land; areas for shared use for motorized and mechanized. There can be non-motorized areas; areas where people can experience solitude. We can have it all. The only thing that stands in the way is the willingness to move away from the "wilderness or nothing" mindset.

3) There are several viable alternatives to wilderness that conform to congressional standards, such as National Conservation Areas, National Recreation Areas, National Protection Areas, Backcountry Recreation Area, as well as others. Some lands do need protection, which is available in practical and useful designations that can be tailored to fit resource values and public need equally well without locking out much of the population and threatening the very security of the nation by forever holding precious commodities out of reach in times of crisis and need.

4) The vast majority of lands held up as suitable for Wilderness not only do not meet the criteria of the Wilderness Act, but most are clearly at odds with what the land management professionals believe should be managed as wilderness. They were grazed for generations, ranched for generations, with roads and trails everywhere used by motorized recreationalists and ranchers. According to the Wilderness Act definition, "to preserve and protect certain lands in their natural condition," "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain," these lands aren't truly qualified for wilderness designation. However, much of our public land reflects an undeveloped, backcountry character. Evidence of man's activities may be present and obvious to a knowledgeable observer. However, this evidence is not dominant and the landscape is generally perceived as possessing natural, primitive or backcountry characteristics, which must be maintained under ANY land designation category established by

Congress. The establishment of a backcountry land designation can achieve all of these objectives. The land will be protected and the public will still be able to experience and understand the values of these unique areas. Countless court cases and legal challenges that reduce our nation's financial resources could be reduced.

5) Wilderness designation in general is bad news for already suffering game populations - most species require young forest habitat, which is largely created by timber cuts and fires, and those treatments are either not allowed or harder to perform in wilderness areas. David Whitmire, program chairman for the N.C. Bowhunters Assn. and owner of Headwaters Outfitters, wonders if some proposed wilderness areas in his state might be better suited for wildlife management, especially for elk as the herd continues to grow and seek new habitat. He also fears how hunting opportunities would be affected. They have already declined over the last few decades, and he questions how wilderness designation would affect species such as white-tailed deer.

6) In the 1970s, America valued land and resources as economic commodities. Over the last three decades, natural resources and land, especially wild lands, seem more for their recreational and preservationist potential. Traditional economic commodities, such as timber, minerals and livestock, by which people live and make a living, are deemed less valuable than the raw land on which, and in which, these resources are located. Undeveloped, unspoiled, roadless land seems increasingly the prize, not the fir trees, gold or cattle that early on drove commodity developers to populate and exploit the American frontier. Surveys by the USFS reveal that between 75% and 95% of the public values national forests for clean water, wildlife habitat, recreation and quiet natural places for personal renewal, while only 50% values them for grazing or the raw materials needed to support local industries and the population. Hunting, fishing, hiking and wildlife viewing are considered more valuable than extraction of natural resources. One commodity that still has viability in the 21st Century is obviously the energy resource. Coal, oil and gas continue to have enormous economic value and attractiveness to developers.

When energy resources are located within wild lands or Wilderness Study Areas, an enormous conflict arises between those wishing to preserve the wild lands as a much-desired preservation area, even to the point of extreme violence. In these wilderness areas, tensions arise among three distinct groups: non-users, users, and would-be users who are prohibited by law from entering these lands. Their interactions, and their effects on wilderness lands, produce these distinct problems: (1) large-group negative externalities, {an external effect, often unforeseen or unintended, accompanying a process or activity}, (2) a "true" tragedy of the commons and (3) resource popularity conflicts. The first of these problems occurs when the users of the wilderness go to it and use it in a way, or in such numbers, that negative externalities are imposed upon a large non-user group. Resource popularity conflicts arise when (1) there is more than one group of wilderness users themselves. When a resource like a wilderness area is not subject to property rights, users permitted access cannot exclude other similar users, meaning that they tend to overexploit it, creating a severe conflict. When wilderness users not only unsustainably exploit the resource, but also impose mutual externalities upon each other, the result is a "true" tragedy group that wishes to use an area, (2) the groups wish to use it in different and incompatible ways, and (3) applicable law, such as the Wilderness Act, permits one group of users but excludes others. As a result of resource popularity conflicts in the wilderness context, excluded would-be users often oppose the creation of new wilderness areas, since their preferred use will be prohibited there. Designated users and excluded would-be users often continue their battle in court, where federal funds are wasted in deciding who is allowed singular use. Those who use wilderness lands overuse the area to the point where its essential wilderness character is impaired; a large-group negative externality occurs which is borne by non-users who value natural lands. In most cases, the public preference for preservation is not a consequence of the public's concern for ecosystem integrity, but rather a result of the public's desire to recreate on such lands, because if the public were really interested in preservation recreational use would decrease. What Is a Tragedy of the Commons? The Wilderness Act creates a true tragedy of the commons by permitting an unlimited number of designated users (primarily hikers) to access wilderness areas, so long as the use consists of a "primitive . . . type of recreation." A federal wilderness area thereby becomes a "commons," or more precisely, a type of common property for the designated users. Federal wilderness areas create resource popularity conflicts for three reasons. First, there are two groups that wish to use the resource - low-impact, non-motorized recreationists like hikers; and higher-impact recreationists like mountain bikers and off-road vehicles ("ORVs"). Second, the uses conflict. Third, the Wilderness Act and its regulations permit one use while excluding all others. The United States Congress, the federal land management agencies, and the courts have utterly failed to address the root causes of the problems that flow from wilderness. The result is a current legal policy towards wilderness lands that is incoherent, non-responsive, and ineffective.

Wilderness has some incredible benefits: clean air and water, absorption of greenhouse gases, the sustainability, spiritual values, as well as the obvious financial benefits to the economy where approximately \$1 trillion is reported in annual retail sales for gear, food, lodging, entertainment and transportation associated with both low-impact recreationists and non-motorized outdoor recreation. This economic boom occurs outside of wilderness areas and benefits non-users, as well. But the truth is that backcountry designation brings the same benefits, adding to the financial side, as non-users are allowed to find places that they can visit and enjoy through motorized access.

U.S. FS Deputy Chief Joel Holtrop has been quoted as saying, ".it is important to maintain the integrity of wilderness by designating only those areas which are, as stated in the Wilderness Act of 1964 and in FS policy, 'dominated by the forces of nature'." He said the agency is concerned about the extensive use of cherry stems, meaning that most of these lands contain roads, mountain bike trails and popular snowmobile areas, and are NOT suitable for Wilderness. This kind of overreaching by Wilderness activists ends up diminishing the integrity of true Wilderness - as it was intended in the 1964 Wilderness Act. Congress approaches the point of rejecting the very premise for the whole concept of Wilderness. Some anti-recreation zealots literally depend on creating more "Wilderness" to the point where new proposals reject basic tenets of the 1964 act. These things need to be pointed out to legislators and misguided activists. The best method to protect remarkable areas is not with Wilderness, but an alternative Congressional designation, such as a "Backcountry Recreation Alternative ." This is public land and we ALL have a stake in it. This is about allowing people to access the public lands. We can't see them all, but those that we can see, we want to be able to give that same opportunity to our children and grandchildren.

Alternative E has all the components needed to allow for diversity in access to backcountry areas for all Americans: additional recreation emphasis areas and additional motorized and mechanized recreation opportunities. It would also boost the economy by allowing a greater percentage of timber production, also providing American consumers with supplies for homes and other necessities. It has the merit and capability of bringing sound future decision-making, providing people and communities with a range of social and economic benefits, promoting sound land stewardship in partnership with communities and maintaining or restoring ecological integrity.