

Date submitted (Mountain Standard Time): 9/7/2020 1:29:04 PM

First name: Scott M, and Julie E.

Last name: Hancock

Organization:

Title:

Comments:

Please specify whether this objection is to the Custer Gallatin Land Management Plan or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

Land Management Plan

Regional Forester's List of SCC

Statement of issues and/or parts of the plan revision to which the objection applies:

The majority of our objections relate to Backcountry Area (BCA) designations resulting in insufficient designation of recommended wilderness by the plan revision for the Gallatin Range, the Pryor Mountains, the Crazy Mountains, Cowboy Heaven and Lionhead areas. In addition, we object to the plan's failure to add a number of proposed Recommended Wilderness Areas to the current Absaroka-Beartooth Wilderness.

Also, elimination of Recommended Wilderness status for five of the six Wilderness areas, totaling 33,000+ acres, which were recommended by the previous Gallatin N.F. and Custer N.F plans is wrong and inappropriate.

Concise statement explaining the objection and suggestion how the proposed plan should be improved:

The reasons for this objection are:

In general, Backcountry Area designations within the Gallatin, Pryor, Crazy, and Absaroka Beartooth Mountains, Cowboy Heaven, and Lionhead areas do not provide the permanent protection of designated Wilderness these areas deserve. Recommended Wilderness designation will 1) insure adequate protections for water flow and quality, 2) reduce human-caused soil erosion and maintain soil productivity, 3) protect and support the diversity of native vegetation, 4) protect diverse and interconnected wildlife habitat to support the health of native wildlife populations, and 5) provide maximum opportunities for quiet and slow nonmotorized and nonmechanized recreation (including the exclusion of airstrips and landing facilities) in a composite of solitude, high quality water and undisturbed soil resources, and wildlife habitat. Backcountry area designations do not provide the level of resource protection that will stand the test of time, and we object to the majority of such proposed BCA designations in current roadless Wilderness Study Areas.

The Gallatin Range: The 155,000 Hyalite-Porcupine-Buffalo Horn Wilderness Study Area has profound and important wilderness values which must receive permanent Wilderness designation. The revision plan proposed 79,631 acre Gallatin (Crest) Wilderness Area is much too small, and the full 155,000 acres deserve full Wilderness protection. We feel that both the Buffalo Horn Backcountry Area and the West Pine Backcountry Areas should be designated as Recommended Wilderness. These two areas deserve Wilderness status that excludes motorized and mechanized recreation. We have observed in both areas mechanized/motorized incursions that have had a significant negative impact on the moose, bighorn sheep, and grizzly and black bear

(& wolverine) populations in the area, damage the integrity of the trail system and promote trail erosion and degradation. In addition, motorized and mechanized use has as a profound deleterious effect on the solitude and wild nature of this portion of the Gallatins. We object that the plan's designation of these two areas as Backcountry Areas does not provide adequate protections to these wildlands. Only the prohibition of motorized and mechanized recreation and travel in both the Buffalo Horn/Ramshorn and West Pine areas will provide long-term (think decades and centuries, if possible) wildlife habitat and corridors, sustainable soil and water quality, and increasingly hard-to-find solitude. History indicates that in 50 to 100 years very few will regret this wilderness designation, but many would regret the failure of current generations to fully protect this irreplaceable national resource which will provide important nonmechanized wildland connectivity.

**Pryor Mountains:** Although the plan revision expands the Lost Water Canyon RWA to include more of Crooked Creek and recommends Bear Canyon for Wilderness designation, we object that the plan does not provide such protection to both Punch Bowl and Big Pryor. We object that the plan's Backcountry Area designation for these two areas is too arbitrary and subject to change. We do not want to see motorized or mechanized recreation in these areas - ever. The use of trailbikes and mountain bikes will be eclipsed by newer technologies in the future, and the Pryors deserve long-term codified protection from such disruptions and intrusions. We all know there are plenty of other areas and trails available for these uses elsewhere in the Pryors and south central/east Montana. We want our children and their families to be able to hike, bird-watch, and study Punch Bowl and Big Pryor as well as Lost Water and Bear Canyons quietly into the future. Eastern Montana, with its unique ecosystems within the USFS's Northern Region, needs more designated Wilderness Areas such as Punch Bowl and Big Pryor.

**Crazy Mountains:** Although we applaud the Recommended Wilderness designation for the 10,000+ acres in the southern Crazies, we object to the 28,000+ acres designated BCA. We believe that these acres along with the extensive inventoried roadless areas of the Crazies should be managed for nonmechanized/nonmotorized use only. We feel that as much of the Crazies as possible should be managed and designated as a Recommended Wilderness Area. Management of the Crazies as wilderness will help protect high altitude wildlife habitat for species of concern such as pikas and wolverines. Until consolidation of checkerboard land ownership patterns can fully occur we believe the CGNF portion of the checkerboard should be managed as designated Wilderness with nonmotorized and nonmechanized recreation only to help insure wildlife security, water and soil quality, and wilderness values for future generations.

**Cowboy Heaven:** Although I did not earlier comment directly on the Cowboy Heaven country of the Madison Range (because I had never been in that area), I would like to offer an objection to its designation as a BCA in the revised plan. This summer I was fortunate to hike in a significant portion of Cowboy Heaven, and I was impressed with the wildlife habitat, wilderness values and solitude present. I feel the revised plan should recommend Cowboy Heaven as designated Wilderness as it has significant importance connecting the Spanish Peaks and Beartrap Canyon Units of the Lee Metcalf Wilderness. It represents a quiet and relatively undisturbed wildlife corridor which must be maintained. The mountain bike access a BCA designation would provide is not needed here and many bike organizations, including our own Livingston Bike Club, have recommended Wilderness designation for the majority of Cowboy Heaven.

**Absaroka Beartooth Mountains:** Although we applaud the small expansion of the A-B Wilderness in the Timberline Lake area up the West Fork of Rock Creek, we object to the revised plan's failure to designate Recommended Wilderness status for the following Red Lodge area RWAs as outlined in Alternative D: Red Lodge Creek, East Rosebud to Stillwater, West Fork Rock Creek, and Line Creek. These areas are all adjacent to the existing A-B Wilderness and it is logical to protect their wilderness characteristics by joining them with the existing designated Wilderness. In Park County, we object to the proposed Emigrant Peak, Chico Peak, and Dome Mountain RWAs being removed from designated wilderness designation by the revised plan. We hike, ski, and hunt these areas and their suitability for Wilderness is overwhelming and make sense due to being adjacent to existing A-B Wilderness lands.

Elimination of Previously Recommended Wilderness: Elimination of Recommended Wilderness status for five of the six Wilderness areas, totaling 33,000+ acres, which were recommended by the previous Gallatin N.F. and Custer N.F. plans is wrong and inappropriate. Although I earlier did not comment on the Lionhead, this includes the Recommended Wilderness designation for the Lionhead area which serves as an important wildlife corridor. The de facto emergence of mountain biking in the Lionhead has been tolerated by USFS management, and the unauthorized presence of mountain bikes should not lead the Custer-Gallatin to remove the Recommended Wilderness designation. We urge the Custer-Gallatin N.F. to retain RWA status for the five areas previously so designated by the earlier forest plans.

Proposed Solution: Our proposed solution is for the revised plan to be altered to provide Recommended Wilderness status for all of the above-mentioned wildland areas - Porcupine-Buffalo Horn, Punch Bowl, Big Pryor, the Crazy Mountains, Cowboy Heaven, Lionhead, and Absaroka Beartooth Wilderness additions. In general, we would like to see further inclusion of most, if not all, of Recommended Wilderness designations outlined in the earlier Alternative D. We feel that only Recommended Wilderness rather than Backcountry Use Area designations will insure the long-term protection of water, soil, vegetative, wildlife habitat, and quiet nonmotorized/nonmechanized solitude that will become even more valuable in the future.

Statement demonstrating the link between objection and prior formal comments: I affirm that these objections are directly related to prior formal comments we submitted on the Draft EIS for the Draft Revised Plan for the Custer Gallatin National Forest. Those original comments were submitted electronically by us on June 1, 2018 at 3:04 pm. I acknowledge that our original comments did not specifically mention Cowboy Heaven and the Lionhead area, but I request the above objections to management decisions for these areas also be given serious consideration.