

Date submitted (Mountain Standard Time): 9/7/2020 3:58:58 PM

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Last name: Paden

Organization:

Title:

Comments:

I would like to thank the Forest Service for all of the work that has gone into the Forest Plan. I was especially excited to see that the Forest Plan includes the following:

Recommended wilderness in the Crazy Mountains and recognition of the area as important to the Crow Tribe. Expansion of recommended wilderness in Lost Water Canyon and the addition of Bear Canyon in the Pryor Mountains. Maintaining the primitive character and management of the roadless areas in the Ashland Ranger District (Tongue River Breaks, King Mountain, and Cook Mountain). Ensuring recommended wilderness will be managed without non-conforming uses..

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

My objections apply to the following issues in the Custer Gallatin Land Management Plan:

Cowboy Heaven (MG-CHBCA)

Crazy Mountains Backcountry Area (BC-CMBCA)

South Crazy Mountain Recommended Wilderness

Chalk Buttes Backcountry Area (SX-CBBCA)

Pryor Mountains BCAs

Elimination of recommended Wilderness, including Lionhead

Hyalite area (MG-HREA)

Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA)

Concise statements explaining the objection and suggestions on how the proposed plan should be improved:

Cowboy Heaven (MG-CHBCA):

I strongly object to Cowboy Heaven not being recommended for Wilderness. It is essential to include the largest possible contiguous areas as wilderness in order to protect the different ecosystems within the CGNF. This is the best way to protect species diversity and overall ecological function. Please incorporate this important element of the Gallatin Forest Partnership Agreement by recommending Cowboy Heaven for wilderness in the final plan.

Crazy Mountains:

All of the proposed Crazy Mountain RWA as described in the original Alternative D should be protected as designated wilderness, not just the small southern portion. A much larger wilderness is required to preserve the outstanding natural values of the Crazies as well as their cultural significance to the Crow Nation. The proposed Backcountry Area should be modified to prohibit mechanized use. There are no existing mountain bike trails in this area and leaving the door open for the trails to become designated down the road only invites conflict where there doesn't need to be any. The overemphasis on mechanized recreation represents a mistaken approach of trying to satisfy all desires for forest use when in fact the great majority of users are hikers or on horseback. I feel very strongly that the area should include a suitability component similar to the Bad Canyon backcountry area: The backcountry area is not suitable for mechanized transport, except use of game carts.

I would also like to see the Crazies BCA expanded east to include sections 4, 22, 26, and 34. If the proposed East Crazy Mountains land swap goes through, this will be a contiguous area and should be managed consistently with the adjacent backcountry area.

I was extremely pleased to see the Crazies receive some recommended wilderness protection. While I wish it was much bigger, I understand that there are many interests Supervisor Erickson is balancing. However, I ask that the South Crazy Mountains recommended wilderness be expanded east. That would help to make a larger contiguous recommended wilderness area.

Chalk Buttes:

The Chalk Buttes are another important place where I would like to see improved language in the backcountry area plan components. This landscape is unsuitable for mountain bikes and their use would lead to rapid

erosion. Similar to the Crazy Mountains, there are no existing designated mountain bike trails here. The Backcountry area should include the following suitability component in order to protect the current wild character of the area: The backcountry area is not suitable for mechanized transport, except use of game carts.

#### Pryor Mountains:

While I appreciate that recommended wilderness was expanded in Alternative F, I would like to see Punch Bowl and Big Pryor also recommended for wilderness. There are already many opportunities for mechanized recreation in the Pryor Mountains. For these reasons, I request that the Big Pryor and Punch Bowl areas be recommended for wilderness in the final plan.

#### Elimination of recommended Wilderness:

I was extremely disappointed that the Forest Service decided to eliminate 26,135 acres that had been previously recommended in the 1986 and 1987 plans respectively. I am particularly disappointed to see that the Lionhead recommended wilderness has been eliminated. The Bozeman area is one of the fastest growing in the nation. Increased population pressure on the Greater Yellowstone Ecosystem can only be alleviated through increases in recommended and ultimately designated wilderness areas.. Please consider reincorporating the Lionhead, Burnt Mountain, Republic, Mystic, and Line Creek Plateau as recommended wilderness in the new plan. It is important that we continue to protect these areas as recommended wilderness because the wilderness character has not changed there since they were recommended in the old plans.

#### Hyalite:

I encourage the Forest Service to fully implement the Gallatin Forest Partnership agreement, including key elements of the agreement that would protect Hyalite. Currently the plan doesn't offer any protection for the South Cottonwood Area or Mount Blackmore. South Cottonwood and Mt. Blackmore should be protected from logging and the ecosystem degradation that road building causes.

In addition, I would like to see the Hyalite Recreation Emphasis area include the standard that was in Alternative C in the DEIS: Construction of new motorized trails shall not be allowed. It is very important that we ensure that the motorized footprint does not continue to expand because of the impact it has on the opportunity for high quality recreation for other users. There is plenty of motorized opportunity in Hyalite as is. Please include this important standard to ensure that Hyalite continues to be a place where users of all types can have high quality recreation experiences.

The Buffalo Horn and Porcupine drainages and all other regions included in the original Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA) must be designated as a Recommended Wilderness Area. Failing to do so means that the Forest Service will not comply with the 2011 order by the US Ninth Circuit Court of Appeals that FS must manage the entire HPBH WSA to maintain its wilderness character. Such designation is by far the best way to preserve the water and soil quality, species diversity, old growth habitat, and overall ecological function of the Greater Yellowstone Ecosystem.

#### Statement demonstrating the link between objection and prior formal comments:

I submitted a comment on the draft plan and draft EIS last spring. While I appreciate that many things I supported are included in the final plan, my objections speak to those priorities from my prior comments that were not included. Thank you for considering these objections that I believe could significantly improve the final plan.