

Date submitted (Mountain Standard Time): 9/7/2020 9:57:58 PM

First name: David

Last name: Steinmuller

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

1. Statement of issues and/or parts of the plan revision to which the objection applies: My objection pertains to the Hyalite Porcupine Buffalo Horn Wilderness Study Area (HPBH WSA): Although I am pleased that the final plan recommended Wilderness for greater than 77,000 acres, I am disappointed that the recommendation is less than the full acreage the Gallatin Forest Partnership (GFP) agreement recommends for Wilderness designation.

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

* The reasons for this objection are: Due to its unique qualities, including the Gallatin Crest, the HPBH WSA deserves the highest level of protection for wilderness character, wildlife habitat, and wildlife corridors.

* Proposed Solution: Reconsider and revise the plan to include the entire acreage the GFP recommended by the GFP agreement for the HPBH WSA as recommended Wilderness designation. The GFP agreement was reached by intense negotiations and collaboration by a wide range of conservation, biological, recreational, and others and supported by the Gallatin, Madison, and Park County Commissioners.

Statement demonstrating the link between objection and prior formal comments: In my earlier comments I supported the GFP agreement for recommended Wilderness designation in the HPBH WSA. Additionally, I support stronger wildlife protection in areas outside of recommended Wilderness in the Porcupine and Buffalo Horn drainages. Conserving, protecting, and enhancing the wildlife habitats should be a primary management goal. Existing recreational access should be consistent with the goals of protecting fish and wildlife habitat and maintaining the existing wilderness character of the area.

2. Statement of issues and/or parts of the plan revision to which the objection applies: My objection pertains to the Cowboy Heaven in the Madison Range. Failure of the final plan to include recommending Cowboy Heaven for Wilderness designation is disappointing. Additionally, no provisions or recommendations are made to protect wildlife habitat, wildlife connectivity, and the wild character of Cowboy Heaven.

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

* The reasons for this objection are: Recognized for its wilderness character and abundant wildlife habitat, Cowboy Heaven contains the attributes deserving Wilderness designation. Wildlife habitat and connectivity would be benefited from inclusion of Cowboy Heaven as recommended Wilderness. With terrain and attributes common to the northern portion of the Lee Metcalf Wilderness Area (to the south of Cowboy Heaven) and the recommended Wilderness unit on the Beaverhead Deerlodge National to the west makes Cowboy Heaven appropriate for recommended Wilderness.

* Proposed Solution: I support recommended Wilderness designation for Cowboy Heaven as listed in the Gallatin Forest Partnership Agreement (GFP). The administrative cabin could easily be removed by a boundary area adjustment from the remainder of the Cowboy Heaven as a recommended Wilderness designation. Wildlife habitat and connectivity for wildlife movement would benefit from a recommended Wilderness designation.

Statement demonstrating the link between objection and prior formal comments: In my earlier comments I supported expansions for recommended Wilderness designation to include Cowboy Heaven in the Madison Range as recommended by the GFP agreement.

3. Statement of issues and/or parts of the plan revision to which the objection applies: My objection pertains to the Southeastern primitive area of the Crazy Mountains.

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

* The reasons for this objection are: The Backcountry Area Allocation of the final plan would allow mountain biking in an where mountain biking access does not exist. This portion of the Crazies is currently managed as primitive and open to foot and stock only. This very rugged area is best managed by retaining its cultural significance to the Crow Nation and its primitive qualities.

* Proposed Solution: Revise the Backcountry Area Allocation for the southeastern portion of the Crazy Mountains to be non-mechanized as well as non-motorized.

Statement demonstrating the link between objection and prior formal comments: In my earlier comments I recommended allowing only foot and horse travel as application of a "primitive" Recreational Opportunity Spectrum (ROS) in the Southeastern primitive area of the Crazy Mountains. Although numerous private inholdings exist in the Crazies, gradually, over time at least some of these inholdings could be removed through land trades or purchase with the primary goal of preserving this iconic area and protecting wildlife habit.

4. Statement of issues and/or parts of the plan revision to which the objection applies: My objection pertains to the Pryor Mountains. While the final plan recommends Bear Canyon for Wilderness designation and recommends expanding the Lost Water Canyon Recommended Wilderness area, I am disappointed that the forest service has not recommended Big Pryor Mountain and the Punch Bowl for Wilderness designation.

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

* The reasons for this objection are: I am concerned at characterizing Big Pryor Mountain and the Punch Bowl as Backcountry Areas because this term is not defined. These areas would be better served as recommended Wilderness. Each area is distinctly different and contains wilderness characteristics and opportunities for solitude and for primitive recreation as well as attributes of cultural significant to the Crow Nation.

Additionally, consistent management should ideally exist across boundaries between the Forest Service, Bureau of Land Management, and Bighorn Canyon National Recreation Area. The fact that the BLM and BCNRA have identified nearly half of the land they manage as Wilderness, provides another rationale for designating Big Pryor Mountain and the Punch Bowl as recommended Wilderness.

* Proposed Solution: I recommend revising the Backcountry area designation for Big Pryor Mountain and the Punch Bowl with recommended Wilderness designations. A recommendation of Wilderness would best preserve the ecosystem, ecological diversity, wildlife habitat, wildlife corridors, and the endemic flora unique to the Pryor Mountains.

Statement demonstrating the link between objection and prior formal comments:

In my earlier comments, I supported the recommendations of the Pryors Coalition for the Pryor Mountains, an island mountain range that is unique in terms of geology, ecology, and biology as well as being culturally significant to several Native American tribes, including the Crow Nation. I encouraged revision of the plan to designate Big Pryor Mountain and the Punch Bowl as recommended Wilderness. Each area is distinctly different and contains wilderness characteristics, and opportunities for solitude and for primitive recreation, and developments that are substantially unnoticeable.