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Organization:

Title:

Comments:

I object to the Custer Gallatin National Forest Plan for the following reason:

The Forest Service is creating wilderness without the consent of Congress. The Custer Gallatin National Forest Draft Record of Decision (CGNFDRD) states on page 26 and additional pages : " I have decided to include a plan component that motorized and mechanized transport is not suitable in recommended wilderness." This is an arbitrary decision which circumvents Congress and their sole authority to designate wilderness. Although the plan states the Forest Plan will not make site specific decisions on specific motorized and mechanized use, the decision to remove motorized and mechanized use in areas recommended as wilderness in future planning actions is in fact a site-specific decision being made in the Forest Plan on where motorized and mechanized use is allowed.

Whether an intentional play on words or simply a bait and switch, the Forest Plan is in fact making site specific decisions which WILL be implemented in future travel planning decisions. During the tenure of Region 1 Forest Supervisor Tidwell a white paper was created by Tom Puchlerz which stated the philosophy of Recommended Wilderness Area management. This philosophy paper implemented an action to remove all historic motorized and mechanized use in areas the Forest Service proposed as recommended wilderness. This philosophy, which was never stated as policy, has been challenged over the years by groups like Citizens for Balanced Use and others. The argument that the Forest Service is creating wilderness without congressional designation has great merit.

Recent letters from the Forest Service Chief Christiansen dated August 6, 2019 to several of the Idaho congressional delegation along with a letter dated April 23, 2019 from current Region 1 Forest Supervision Leanne Marten state: "All prior (RWA) direction has been superseded". This indicates the philosophy initiated and actions taken to remove motorized and mechanized use in areas recommended as wilderness in past decisions by Region 1 has changed both nationally and in Region 1 but the Custer Gallatin National Forest Supervisor Mary Erickson is not recognizing this change. We request the Custer Gallatin Forest Supervisor recognize the recent change in management direction of recommended wilderness and allow existing and current historic use to continue.

The Custer Gallatin Forest Plan proposes to close additional access to multiple use recreation. This action is contradictory to the new June 12, 2020 directive from the Chief of the Forest Service. The Secretarial Memorandum which states the purpose of this directive is to "Establish vision, priorities, and direction on:"  
Increasing the productivity of National Forests and Grasslands  
Valuing our Nation's grazing heritage and the National Grasslands  
Increasing Access to our National Forests  
Expediting environmental reviews to support active management

According to the Forest Service and their NVUM survey less than 3% of the public recreate in wilderness areas yet more than 1/3 of the Custer Gallatin National Forest is designated wilderness and closed to all motorized and mechanized use. Nearly another million acres is designated as roadless and has additional restrictions on motorized and mechanized use. All in all, 2/3 of the Custer Gallatin National Forest restricts multiple use recreation of both motorized and mechanized use. The 2004 Travel Plan closed nearly 50% of the trails once open to motorized use. Closure after closure in the past 20 years has caused more crowding on the remaining open roads and trails. There has never been a planning action where the Forest Service increases areas of access for motorized recreation.

Most of the public desires motorized and mechanized use. These uses provide public land access opportunities for the elderly, disabled, handicapped, and physically challenged. Access to our public lands provide more than just recreation value, they provide a sense of mental wellness. Sharing outdoor experiences with families of multiple generations is an important aspect of many people's lives. Closing more access to these families and different age groups is unacceptable.

Motorized use is the fastest going outdoor recreation activity in the nation and Montana but the Custer Gallatin has ignored this activity along with the new directive from the Forest Service Chief. The Custer Gallatin

National Forest Supervisor is proposing an additional 125,000 acres of wilderness that will remove all motorized and mechanized use in these areas as soon as possible. Why is Supervisor Erickson being allowed to deviate from a national directive from her boss? Public needs of more multiple use recreation are real. This forest is failing to provide for those needs.

The Forest Plan failed to provide an alternate that would increase motorized and mechanized recreational access to the Custer Gallatin National Forest. Comments were submitted to the Forest Service requesting an alternative that increased access for both motorized and mechanized use. This is a clear violation of NEPA in not providing a wide range of alternatives for the public to comment on. I object to the decision to reduce motorized and mechanized use areas, the lack of an alternative that increases motorized and mechanized access, and the fact the Custer Gallatin Forest Supervisor's decision does not follow the new June 12, 2020 directive from Forest Chief Christiansen. I request the decision be remanded and a new alternative be developed that follows the Chief's directive to increase productivity, increase grazing opportunities, and increase access.

I request the new proposed Custer Gallatin Forest Plan be remanded and a new plan be developed that addresses the needs of those in need of motorized and mechanized transport in order to access their public lands.

In my own words, any closure to motorized use would negatively impact my life. I work and play in areas the Forest Service wants to close in this travel plan. I need to continue being allowed in these areas, as I have been, to enjoy and share our public lands myself as well as with my friends, family and clientele.

If 2020 has taught us anything, the Forest service should not take away from the American people. If Tyler Vance's forced entry through Yellowstone Park caused a change in Park openings and if George Floyd's death was enough to cause looting and riots in every major city across the country, then the Forest Service should not challenge the closing of any access to any type of public users as it is their land, not the Forest Service's.

Signature: Jayson Works