



Custer Gallatin National Forest  
Attn: Forest Plan Revision Team  
P.O. Box 130 (10 E Babcock)  
Bozeman, MT 59771

Submitted online at:

<https://cara.ecosystem-management.org/Public/CommentInput?project=50185>

Re: Draft Revised Forest Plan and DEIS

June 6, 2019

Dear Forest Planning team,

On behalf of the Gallatin Forest Partnership, please accept these comments on the Custer Gallatin National Forest's Draft Revised Forest Plan and Environmental Impact Statement. We want to thank the Forest planning team for including many of the recommendations submitted by our Partnership within the range of alternatives being considered for the Gallatin and Madison Ranges. We continue to believe our agreement offers the best solution for the long-term management of these two ranges, to protect the wildlife, clean water, wild lands and recreation opportunities so enjoyed by the growing communities of Livingston, Bozeman and Big Sky.

In these comments, we've identified some key pieces of our agreement that appear to be missing. We believe incorporating these elements of the agreement into your final decision would both better reflect our agreement and strengthen the final forest plan. We are also submitting the latest list of businesses, organizations and individuals who have endorsed the Partnership agreement to demonstrate the growing public support for our proposal.

Thank you for the opportunity to offer these comments for your consideration.

### Land allocations and designations:

#### **West Pine Backcountry Area (3.7.18):**

Thank you for your good faith attempt to model the West Pine BCA after our proposed West Pine Wildlife Management Area. While the plan components for this area in the draft forest plan represent *parts* of the GFP agreement for West Pine, there are some key pieces of our agreement missing. It is important to the Partnership that the entirety of our vision for these landscapes be implemented; otherwise it threatens the integrity of our collaborative agreement. There are a few things that we believe must be represented in the forest plan, and there are some places where we would like to see the draft plan components strengthened.

#### Desired Conditions (MG-DC-WPBCA):

We proposed three “management goals” for West Pine with equal weight and want to ensure that they are represented by three desired conditions in the final forest plan. Currently there is only one desired condition, focused on quiet, nonmotorized recreation. Our shared values for protecting wildlife and wild character are central to our recommendations. As a result, we recommend two additional desired conditions, similar to the language included for the Cabin Creek Recreation and Wildlife Area (MG-DC-CCRW):

- Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area.
- The area retains its wild, remote and natural character.

If you do not feel that the entire suite of these desired conditions fit within the definition of a Backcountry Area, then we recommend crafting a special management area (SMA) that could reflect our three equally important desired conditions for West Pine to ensure that future managers understand the intent of the management direction.

#### Additional Plan Components for West Pine Backcountry Area:

We also recommend the Forest incorporate some additional plan components (goals, objectives, guidelines) into the West Pine area to reflect more of our management recommendations for West Pine. The draft plan misses some of these components, particularly the objectives around future mechanized trail development and wildlife.

The Partnership agreement recommends allowing mountain bike use on the existing system trails in West Pine currently open to foot and horse travel only. While we understand the forest plan cannot make travel plan decisions, we would like to see some acknowledgement that this recommendation requires further action by the Forest Service. We suggest incorporating an objective with a specific timeline by which a travel plan decision will be made for this area to bring the forest plan and travel plan into alignment if the analysis demonstrates it is feasible.

The Partnership agreement also identifies two areas where new trail construction could be considered to enhance the connectivity of the West Pine trail network. Again, we understand that forest plan cannot make these site-specific decisions, so we recommend an objective regarding enhancing trail connectivity by identifying opportunities to connect existing trails to create loop rides or to connect to other parts of the trail network.

Finally, for each of the agreement’s land designations, we identified the need to ensure no net change in system trails or trail density. We would like to see clearer guidance in the forest plan to ensure the existing development footprint in the WSA does not continue to expand.

### **Buffalo Horn Backcountry Area (3.7.16)**

Again, the Partnership appreciates the effort by the Forest Service to incorporate elements of our agreement into the plan components proposed for the Buffalo Horn Backcountry Area in Alternative C. We are encouraged to see the willingness to tailor management direction for specific backcountry areas in response to the unique characteristics of the area by incorporating our somewhat different recommendations for Buffalo Horn and West Pine.

Once again, there are some elements of our agreement that are missing or that we would like to see strengthened in order to ensure that our agreement is fully reflected in the final plan. In developing our recommendations for the Buffalo Horn area, we looked to the Cabin Creek Recreation and Wildlife Area as an example.

#### Desired Conditions (MG-DC-BHBCA):

As we noted in our comments on the West Pine Backcountry Area, we would like to see additional desired conditions identified for the Buffalo Horn Backcountry Area. This area provides important wildlife habitat for a range of species migrating from Yellowstone National Park. It is also a popular recreation destination in all seasons, particularly for the Big Sky community.

These high wildlife and recreation values require proactive management to prevent the degradation of the important wildlife habitat values and increased conflicts between wildlife and recreationists.

As we identified in our comments regarding West Pine, we believe the desired conditions must reflect the importance of managing for wildlife and wild land values as well as recreation. We recommend incorporating additional desired conditions similar those additions we identified for West Pine:

- Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area.
- The area retains its wild, remote and natural character.

#### Additional Plan Components:

As a partnership, many of our discussions regarding the Porcupine-Buffalo Horn area revolved around balancing recreation use with the needs of wildlife for secure habitat. Minimizing trail density is one way to ensure wildlife still have places to go without regular human use which the DEIS speaks to (3.10.6, p. 483).

Within the Porcupine Buffalo Horn area, there is a proliferating network of non-system, user created trails between the Big Sky snowmobile trail and Highway 191. This creates issues for wildlife by degrading secure habitat and for recreationists who are using some of these non-system trails that have become popular.

To address this issue, the Partnership's agreement recommends that:

- Immediately following completion of forest plan revision conduct travel analysis for all trails within the P-BH area, designate additional system trails as necessary, and allow no new trail construction following this process.

We would like to see an objective that commits the Forest Service to conducting this travel analysis within a certain time frame and in coordination with Montana Fish, Wildlife and Parks. For example, such an objective could read:

- Within 3 years, initiate travel analysis for the Buffalo Horn Backcountry Area to evaluate the area's trail network, including non-system trails, to identify and designate the necessary trail network.

We support the Forest Service getting a handle on user created non-system trails, freezing the overall trail density and where possible removing redundant trails in the Buffalo Horn backcountry area.

Finally, there is no mention in the plan components for the Buffalo Horn backcountry area of the Grizzly Bear Primary Conservation Area. This designation will at least partly drive management decisions in the Buffalo Horn backcountry area and should be incorporated into the plan components for the area.

#### **Hyalite Recreation Emphasis Area (3.7.13):**

Thank you for including the Partnership's expanded Hyalite REA boundary in Alternative C. We believe including the Sourdough and S. Cottonwood drainages as well as the entire landscape in between more appropriately reflects the area of the northern Gallatin Range that sees the highest recreation pressure. We are encouraged that the Forest Service is looking for ways to address this level of use in balance with protecting the other natural resource values found in this part of the Gallatin Range.

We reviewed both the forest wide plan components that would direct management of REAs and the specific plan components for Hyalite. We offer the following recommendations and additions to clarify and strengthen these portions of the plan and better reflect the Partnership's full agreement.

#### Forest wide direction for Recreation Emphasis Areas (2.4.47):

Because the intent of the Partnership's agreement is to maintain the recreational access in Hyalite as it is today, we are concerned with some of the language in the desired conditions for the semi-primitive nonmotorized (SPNM) winter allocations, which include Sourdough and Hyalite in Alternative C.

Specifically, the desired condition for SPNM winter (FW-DC-ROS 06) includes the phrase "Trails are generally un-groomed ...." This could be interpreted to mean that groomed trails for nonmotorized winter recreation in both Sourdough and Hyalite are not allowed. We support the SPNM winter designation for the northern part of the Gallatin Range. To

avoid confusion or changes in interpretation down the road, however, we recommend deleting the language that “trails are generally un-groomed” from the SPNM winter nonmotorized desired condition.

The forest wide direction for all recreation emphasis areas also raised some questions for the Partnership that could affect management of the Hyalite REA.

The guideline regarding construction and management of temporary roads, skid trails and landings suggests the Forest Service is thinking about preventing the proliferation of user created trails in heavily used recreation areas. We are encouraged by this forethought. However, user created trails become established in other ways in addition to active timber management. It may be useful to develop an additional guideline focused on preventing the general development of user created trails.

Recreation emphasis areas are identified as suitable for “a high density of recreation development.” (FW-SUIT-REA) We would like to see a clearer definition of “high density” in this context. Does this mean suitable to absorb a lot of people or suitable for increased development such as more paved campgrounds, more developed facilities, etc.? Please add a definition of “high density recreation development” to the glossary.

The only new recreation development in Hyalite envisioned by the Partnership would be new single-track trails to create loop rides and better trail connectivity outside of the Wilderness Study Area. We don’t see “high density” developed recreation sites in the area or a greatly expanded development footprint. If the definition of high density is incongruent with the Partnership’s vision of limiting development beyond trail-building to improve trail connectivity and loop opportunities, then an additional plan component is required in the Hyalite REA management direction to clarify that new development should be limited to trails.

#### Desired Conditions (3.7.13 MG-DC-HREA):

We are disappointed that the desired conditions for Hyalite Recreation Emphasis Area almost exclusively focus on recreation with only passing mention of the area as a municipal watershed. We recommend additional desired conditions be developed that speak to protecting the wildlife and wild values of the area as well as more specifically ensuring a clean, reliable water source for Bozeman.

#### Additional Plan Components:

In order to more fully reflect the Partnership’s agreement, we recommend the following changes and additions to the plan components for the Hyalite Recreation Emphasis Area:

- MG-STD-HREA O1 in Alternative C captures the Partnership’s recommendation that no new motorized trails be constructed. However, we also want to ensure that areas and trails that are currently non-motorized stay non-motorized. The ROS maps are at such a coarse scale, it is difficult to be sure this is the case. As a result, we recommend

Standard 01 be changed to read “*construction and designation of new motorized trails shall not be allowed.*”

- Alternative C includes a lakeshore development objective (MG-OB-HREA) that warrants clarification to reference Hyalite Reservoir. As it reads now, this objective could mean any lake in the area, including Hyalite, Emerald and Heather Lakes, which would not be appropriate locations for lakeshore development or developed day use areas.
- Similar to the objectives regarding day use areas at MG-OB-HREA, we would like to see the addition of a new objective regarding new trail construction in the front country of HREA to create loop opportunities. For example, “*Per decade, two additional trail connections will be developed or converted from nonsystem trails outside of the WSA to enhance loop opportunities and trail connectivity.*”
- While other designated areas include a goal regarding partnerships with NGOs, this plan component is missing from the HREA components. We recommend adding a new goal regarding development and continuation of partnerships with NGO’s to increase maintenance and funding capacity within the HREA.
- Forest wide direction for Backcountry Areas includes a standard designed to minimize the impact of access to or development of minerals (FW-STD-BCA 07). We recommend adding a similar standard to the Hyalite Recreation Emphasis Area as [mapping by The Wilderness Society](#) of Gallatin National Forest mining claims and oil and gas leases indicates some old claims within the boundary of the Hyalite Recreation Emphasis Area.

### **Recommended Wilderness in the Gallatin and Madison Ranges (3.7.5)**

The Gallatin Forest Partnership recommended four specific areas for future wilderness designation and made management recommendations specific to the areas within the Partnership’s agreement. We are pleased to see our four areas and many of the management recommendations reflected in Alternative C for the Gallatin Range and portions of the Madison Range.

These site-specific recommendations were carefully negotiated by the specific organizations participating in the partnership and incorporate commitments to other stakeholders. We noticed that the Draft EIS (p. 823) identifies 2,060 acres of over-snow motorized opportunity that would be lost in Alternative C’s proposed Gallatin RWA. We did not intend to close areas legally open to snowmobiling in the Gallatin Range and drew our boundaries for our proposed Gallatin RWA accordingly. In the Final EIS, we recommend using the same buffers for each alternative in order to get the most accurate analysis of the impacts of various land allocations on recreation.

### **Additional Plan Components**

- Both the Draft EIS and Recommended Wilderness Analysis identify the presence of mineral encumbrances in the Cowboy Heaven and Gallatin RWAs, as does mapping by the Wilderness Society. Given the presence of these claims and the lack of any suitability determinations regarding leasable or locatable minerals and RWAs, we recommend including the same standard found in the forest wide direction for Backcountry Areas

(FW-STD-BCA 07) to minimize the impact of access to or development of these minerals on the wilderness characteristics of these areas.

- In order to maintain and/or enhance the presently existing wilderness character in the recommended wilderness areas proposed for the Gallatin and Madison Ranges, we recommend adding a guideline regarding system trails similar to one proposed for existing designated Wilderness areas (FW-GDL-DWA 01). This guideline reads: To maintain areas of undeveloped wilderness character, there should be no net increase in miles of system trails within wilderness. However, trail re-routes for resource protection or after natural occurrences such as fire, floods, windstorms, and avalanches should utilize the best long-term sustainable routes with minimal trail infrastructure. This would be consistent with the Partnership's desire to see our agreed upon RWAs managed more like designated wilderness areas to protect the opportunity for future designation. An additional desired outcome of the Partnership's agreement is to prevent increased trail density in the backcountry which could degrade wildlife habitat security. This guideline would help achieve that outcome in the Gallatin and Madison Range RWAs.

### General Recreation:

Outside of our proposed designations, the Partnership identified several key areas in the Gallatin Range and along the western flank of the Absaroka Wilderness where the Forest Service could enhance diverse recreation opportunities, cooperative land stewardship, and public land access. While some of these recommendations cannot be implemented through the forest plan, this document does set the stage for what will be possible to implement in the future.

After reviewing the forest wide Recreation direction in the draft plan and the Recreation Opportunity Spectrum maps for each alternative, we've identified the following issues that need to be addressed in the final plan:

- **Electric Bikes:** We appreciate the Forest's fore thought in developing plan components regarding emerging recreational technologies (2.4.33 RECTECH). Electric mountain bikes represent one such emerging technology. The Gallatin Forest Partnership believes that e-bikes should be considered motorized recreation and not mechanized. We would like to see a suitability component added to the RECTECH section that clearly states e-bikes are motorized vehicles and are only suitable on designated motorized routes and trails and/or in areas with an ROS classification that allows motorized recreation (semi-primitive motorized, roaded natural, and rural recreation).

We also recommend adding electric bikes to the types of vehicles described in the desired conditions for semi-primitive motorized ROS, roaded natural and rural recreation ROS, (FW-DC-ROS 07, 09 and 11) and listing them as suitable for these ROS designations.

- **Livingston Peak to Mill Creek area:** Recognizing the relative lack of moderate semi-primitive non-motorized trails in the Livingston area, the Partnership identified some opportunities on the east side of the Paradise Valley, along the western boundary of the Absaroka-Beartooth Wilderness, where it could be possible to develop new non-motorized trails. However, in every alternative, the summer ROS maps included in Appendix A of the DEIS show a stretch of primitive ROS classification that will preclude this opportunity. This area roughly includes the sections of land surrounding Dexter Peak between the North fork of Strawberry Creek and Fire Creek.

Designating this area as primitive in every alternative does not present a full range of alternatives for consideration. We would like to see these sections changed to a semi-primitive nonmotorized ROS to allow for possible new nonmotorized trails if determined to be feasible.

Similarly, on the north side of Livingston Peak, there is a small area of semi-primitive motorized ROS classification where we envision opportunities for some nonmotorized trail development. The GFP would like to see this area included in the semi-primitive non-motorized ROS classification instead, to ensure the opportunity to develop new non-motorized trails accessible from Livingston if shown to be fiscally and ecologically sustainable.

### Wildlife:

The Gallatin Forest Partnership recognizes that the Gallatin and Madison Ranges are home to some of our most rare and iconic wildlife species due to the wild, roadless habitats found here. Ensuring healthy wildlife populations and habitats as well as co-existence among people and wildlife is a core, unifying value of our partnership and the foundation of much of our agreement.

We also recognize that expanding recreation use – of all types – is putting increasing pressure on wildlife in the Gallatin and Madison Ranges because more people are exploring deeper into the backcountry where wildlife find their most secure habitat.

In general, we feel the draft plan fails to grapple with the potential future conflicts between increased recreational use and wildlife habitat in several ways:

- Wildlife, secure habitat and connectivity are not mentioned as a significant or important resource in the desired conditions for the proposed designations in the Madison, Henrys Lake and Gallatin Mountains Geographic Area (3.7).
- The plan narrowly defines human-wildlife conflicts around food attractants and focuses on conflicts between humans and grizzly bears. (See FW-DC-WL 07, MON-WL-03) We believe human-wildlife conflicts also include things such as displacement of wildlife from critical habitat or den abandonment by species such as wolverine and bears. We also believe the people can have a broad range of impacts on and conflicts with more species than just grizzly bears.



- The monitoring plan suggests the only human-wildlife conflict that the Forest Service will track is related to food attractants and grizzly bears. This narrow scope will provide no data to inform adaptive management in the event of conflicts related to human safety and/ or the degradation of secure habitat due to expanding recreation pressure.

Much of the public debate regarding the forest plan revision in the western part of the Custer Gallatin National Forest has revolved around current and future impacts of expanding recreational use on the cherished wildlife in this geographic area. This revised plan needs to enable the Forest Service to adaptively manage recreation in response to future impacts of recreation especially as climate change affects wildlife habitat occupancy, migration and seasonal needs. As a result, we suggest the following ways to strengthen the plan components for the Madison and Gallatin Ranges with regard to wildlife and recreation:

- Add a guideline similar to Guideline 02 in the forest wide direction for big game (FW-GDL-WLBG 02) which suggests scheduling and locating management activities to minimize disturbance of wild ungulates on winter ranges and during the reproductive season. This new guideline should focus on limiting recreation use/ access of all types during similar times of the year when wildlife energy demands are high. It should also include species in addition to wild ungulates where the DEIS identified that recreation may have an impact, such as wolverine and grizzly bears (DEIS, pgs. 380-385 and pgs. 400-409). Such a guideline would incorporate the GFP recommendation that the Forest Service use tools such as seasonal closures to limit recreation use during sensitive times for wildlife.

This guideline would also be consistent with Montana Fish, Wildlife and Parks management of their Wildlife Management Area in the southern Gallatin Range. This guideline could either be incorporated into the forest wide direction or added to the management direction for the Madison, Henrys' Lake and Gallatin Mountains GA. At minimum, we'd like to see it incorporated into the designations for the Gallatin Range, especially the backcountry areas.

- We would encourage the Forest to develop objectives related to the installation of signage related to wildlife closures.
- **Northern Gallatin Key Linkage Area:** We support the concept of a key linkage area designation outside of the more protective designations of backcountry, recreation emphasis and recommended wilderness areas. We see this as a potentially useful tool to manage areas outside of core habitats to ensure the broader landscape continues to allow wildlife migration and movement.

At the same time, the full implementation of our agreement over time is important to all of us. We included the following recommendation in our proposal for a West Pine Wildlife Management Area, which now appears to be in conflict with the proposed management direction for the northern Gallatin key linkage area:

*Develop two new trails in the area as feasible based on terrain, habitat, and budget to improve trail connectivity. The first trail would connect the existing West Pine trail to the North Dry Creek trailhead outside of the WSA, creating a loop ride. **The second trail would head north from the existing Dry Divide Trail (#135) and connect into the Bear Lakes Trail (#53) as practical based on terrain.** If these routes are not practical, other trail routes should be considered in the area of similar length so as to provide a similar quality trail experience. Beyond these proposals, there should be no net change in the system trails. (emphasis added)*

Part of the second proposed connector trail is outside the boundary of the West Pine backcountry area reflected in Alternative C. As the management direction for the key linkage area is currently written, such a connector trail could not be built in the key linkage area.

We believe the management guidelines for the northern Gallatin key linkage area need refinement. A full range of alternatives for management of key linkage areas has not been considered. These areas are either designated and managed according to three guidelines (FW-GDL-WL 02, 03, and 04) as reflected in Alternatives B, C and D or they do not exist at all. We recommend the Forest consider the following additional management options for this linkage area:

- Adjust the boundary of the northern Gallatin key linkage area to protect the opportunity to build the connecting trail envisioned by the Partnership agreement. Specifically, Sections 28, 33; Township 3S 7E seem to contain the most likely corridor for a north-south connector trail based on a review of maps and Google Earth images. These are the sections we propose excluding from the key linkage area. In addition, this summer offers an opportunity to get out on the ground to survey this opportunity prior to making a final decision on boundaries for the linkage area. We would be happy to participate in a field trip to look at this area, but at minimum someone with trail expertise could hike the area.
- Replace the complete prohibition on building new trail with seasonal and/or timing restrictions on the building and use of these trails during sensitive times for wildlife.
- Finally, the current boundary for the northern Gallatin key linkage area overlaps with the Hyalite Recreation Emphasis Area. This may be redundant if the additional plan components we suggest in our comments on the HREA are incorporated. The Partnership's proposal for the Hyalite Watershed Protection and Recreation Area envisioned a level of protection for wildlife to maintain connectivity even in the context of heavy recreational use.

- **Monitoring:** The Gallatin and Madison Ranges are extremely valuable for both recreation and wildlife and these values are interconnected. The presence of healthy wildlife populations in an intact ecosystem enhances the recreation experience. Yet, we all know that increased recreation pressure and/or poorly managed recreation of all types can negatively impact wildlife. Monitoring and adaptive management are essential to achieving sustainable recreation management and ensuring wildlife populations in the Madison and Gallatin Ranges continue to thrive.

Recognizing that much is unknown regarding the impacts of increasing recreation on wildlife habitat security, occupancy and connectivity, we believe the Forest needs to develop a more robust monitoring program related to wildlife and recreation. This monitoring program should include partnerships with agencies such as Montana Fish, Wildlife and Parks, universities such as Montana State University and non-governmental organizations which can help the Forest Service collect appropriate and necessary data, driven by agency developed monitoring questions. These partnerships can also help the agency secure additional funds and labor for this monitoring. Forest wide goal 04 (FW-GO-WL 04) sets the stage for this type of multi-party monitoring which is fundamental to enabling adaptive management and will be essential to building public support for some limits on access to public lands trails.

The Forest Service and its partners should be monitoring both wildlife occupancy of key habitats and recreation use trends (including volume of use) over time in these same key habitats. With regard to recreation, the monitoring questions in the draft plan are solely focused on activities such as trail maintenance being accomplished.

We strongly encourage the Forest to develop better monitoring questions related to this issue such as:

- Is recreation use displacing wildlife populations from critical habitat?
- Is there an increase in wildlife habitat fragmentation due to recreation activities?
- How is the type of recreational use changing? What are the broader use trends with regard to recreation?
- How is the volume of recreational use changing in areas of critical habitat over time?

We also recommend improved outcome and/or implementation indicators for the three general wildlife monitoring questions (MON-WL-01, MON-WL-02 and MON-WL-03). Specifically, the following indicators should be added to the monitoring plan:

- #/types/locations of barriers to wildlife movement and migration on the landscape;
- #/location of incidents of wildlife displacement;
- #/types/locations of changes in wildlife use; and
- % change in unfragmented wildlife habitat.

Finally, we strongly recommend the Custer Gallatin work with MT Fish Wildlife and Parks to monitor wildlife occupancy and recreation use in high value habitats and areas of concern to examine how wildlife occupancy changes over time in relation to recreation use (including, but not limited to: types of recreation use, location of activities, duration of activities, and number of people).

**Water:**

We appreciate the attention given to aquatic resources in the draft plan. We are pleased to see that the streams identified on our priority list of Wild and Scenic eligible streams in their public lands reaches (Big Creek, Cabin Creek, Gallatin River, Upper Hyalite Creek, Madison River and the Yellowstone River) are all included in the Forest's list of potential eligible wild and scenic rivers (Table 27).

Hyalite and Bozeman Creeks are identified as priority watersheds in the Watershed Condition Framework and are a focus for ongoing restoration work. However, there are no plan components included in the Hyalite REA, which includes both watersheds in Alternative C, related to this work. We recommend adding an objective to the Hyalite REA plan components committing the Forest to accomplishing a reasonable number of restoration projects in these watersheds to improve their functioning from "at risk" as currently identified. (see 2.3.4, p. 22 and 3.7.13, p. 184).

**Conclusion:**

The Gallatin Forest Partnership appreciates the opportunity to participate in this forest plan revision and has invested heavily in developing a broadly supported durable solution for the Gallatin and Madison Ranges. We thank the Forest for considering elements of our agreement in the range of alternatives analyzed as part of this process. We hope you will consider the additional plan components identified within these comments to strengthen the final forest plan and better reflect our full agreement.

We look forward to continuing to work together and with the Custer Gallatin to implement our agreement through this plan revision and beyond. Thank you for your hard work on this planning process and for your commitment to the stewardship of the Custer Gallatin National Forest.

Sincerely,

***The Gallatin Forest Partnership***

Members of the Gallatin Forest Partnership signing this comment letter include:

- John Mutter, Gallatin Valley Back Country Horsemen
- Steve Johnson, Big Sky
- Mike Fiebig, American Rivers and Montana Backcountry Alliance
- Denise Wade, Big Sky
- Darcie Warden and Ryan Cruz, Greater Yellowstone Coalition

- Hilary Eisen, Winter Wildlands Alliance and Outdoor Alliance-MT
- John Greene, Livingston Bike Club
- Emily Cleveland, Montana Wilderness Association
- Dane Rider, Montana Chapter, Backcountry Hunters & Anglers
- Adam Oliver, Melissa Cronin & Ian Jones, Southwest Montana Mountain Bike Association
- Barb Cestero, The Wilderness Society
- Tom Owen, Big Sky Mountain Bike Alliance

List of Attachments

- Gallatin Forest Partnership Organization and Business endorsements
- Gallatin Forest Partnership Individual endorsements