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Comments:

Thank you for this opportunity to submit my comments on the Revised Custer Gallatin Forest Plan. My comments focus on recommendations for Wilderness designation on the Custer Gallatin National Forest. I am strongly in favor of and recommend that Alternative D be chosen as the Preferred Alternative for Wilderness Designation on the Forest.

As a thirty year resident of Livingston, MT. and with degrees in forestry and natural resource management, I have had the unique privilege to have explored many of the Wilderness Areas and Wilderness Study Areas (WSA) on the Custer Gallatin National Forest (CGNF). In my opinion, it is one of, if not the wildest complex of Forest Service land in the Lower Forty-Eight States. There is no other Forest that harbors the numbers and variety of endangered and big game species, and its value in protecting the watersheds of several major rivers is priceless. Clearly its wildlife and ecological values are exceptional and certainly of more biological significance and economic importance than the extraction of resources or, for that matter, environmentally damaging recreation.

It is a well known fact that larger protected areas are better for conserving wildlife than smaller patches of habitat. Adding adjacent roadless lands to existing wilderness is important for enhancing the overall conservation values of these existing protected units. This is especially true in an era of climate change which is severely stressing even relatively pristine habitats.

In addition, some wildlands are critical corridors for the movement of wildlife between other protected landscapes. For example, the Bridger Range if well protected, could serve as a corridor connecting the Greater Yellowstone Ecosystem to other lands further north. The Crazy Mountains, if also adequately conserved, could be a stepping stone for wildlife moving from the AB Wilderness to other wildlands.

Unfortunately the CGNF proposed Wilderness recommendations with the exception of Alternative D, are inadequate for sustaining ecosystem integrity, especially in the face of growing threats from climate change, an exponential increase in recreationists, and encroaching private land development. Below are suggested improvements to the CGNF Wilderness recommendations.

GALLATIN RANGE

In total there are about 230,000 acres of potential wilderness in the Gallatin Range, yet only about half of that has been proposed as Wilderness by the Gallatin Partnership's Alternative C. This is totally inadequate. For example, because of its extreme value for wildlife and connectivity, the Porcupine/Buffalo Horn drainage in its entirety should most certainly be proposed as Wilderness. Many other roadless drainages such as the upper portions of Cottonwood, Sourdough, and Trail Creek should be included. West Pine Creek which is a WSA but which currently allows wildlife disturbing mountain biking for whatever reason, because of its important habitat values should also be designated as Wilderness and managed accordingly. These lower elevation areas are critically important for many wildlife species, yet seem to be considered as sacrifice zones in the Forest Plan. Unfortunately the Hyalite drainage has already been significantly affected by the multitude of outdoor recreationists, but efforts should be made to reduce and mitigate these impacts.

The CGNF appears to use the [ldquo]purity[rdquo] argument to disqualify many of these areas from its recommendations saying there is noise from highway traffic, a municipal watershed, or structures that do not conform to the Wilderness Act. This argument is used to exclude tens of thousands of acres from its recommendations (with the exception of Alternative D). In the year 2019 this rings as illegitimate when one considers the level of development affecting nearly every roadless parcel in the country. The maximum amount of WSAs should be proposed as Wilderness, not the minimum.

MADISON RANGE

The 111,000 acres in the Cabin Creek Recreation and Wildlife Management Area should be proposed as Wilderness. It is critical for grizzly bear habitat, and for many other species. Nearly 50 miles of stream support West Slope Cutthroat trout. It should be added into the Lee Metcalf Wilderness.

Another significant 43,000 acre roadless area lies between Big Sky and the Taylor Fork. This area of rolling hills, open meadows, and scenic view is also critical wildlife habitat. It includes Buck Ridge. This area should be added to the Lee Metcalf Wilderness.

A third 17,000 acre roadless portion of the Madison Range north of the Spanish Peaks that includes the upper Cherry Creek and Spanish Creek drainages would connect the Madison Canyon and Spanish Peaks as a continuous unit. Cowboy[rsquo]s Heaven is part of a 26,000 acre roadless area that is split between the CGNF and BDNF. It should be added to the existing Spanish Peak unit of the Lee Metcalf Wilderness. It contains some of the best lower elevation big game habitat, and is used by several thousand elk.

PRYOR MOUNTAINS:

In the ecologically and archeologically unique Pryor Mountains, 13,000 acres in the Lost Water Crooked Creek area - not just the 10,421 CGNF Inventoried Roadless, should be proposed as Wilderness. Additional Wilderness designations should include: Punch Bowl / Dryhead Creek Canyons RWA (~8,500 acres). This will require converting at a couple miles of 4WD road to motor-free along the ridge between the two canyons. Big Pryor RWA (12,000 acres) should also become Wilderness. And Bear Canyon RWA (10,000 acres), an exceptional wildland area, should be protected by Wilderness Designation. In aggregate, these areas still only make up a small portion of the overall acreage of the Pryors and would hardly affect the motorized recreation opportunities available on this USFS Unit.

CRAZY MOUNTAINS

The CGNF recommended no wilderness in the Crazy Mountains. At least 90,690 acres of this spectacular range should be proposed as Wilderness [ndash] the amount of roadless land identified by the USFS itself. Private inholdings should be aggressively removed through land trades or purchase which has been done in other Wilderness units.

ABSAROKA BEARTOOTH WILDERNESS ADDITIONS

There are many potential additions to the AB Wilderness. Along the north face of the AB Wilderness are any number of roadless lands that should be added to the list of recommended wildernesses, including the 129,000 Deer Creek drainage lying between the Boulder River and Stillwater River, and includes lands surrounding the East Boulder, Lower Deer Creek, Upper Deer Creek and Bridger Creek. This area is important elk and deer habitat, not to mention genetically pure Yellowstone cutthroat trout in the upper Deer Creek drainages. At least half of this area could be managed reasonably well as wilderness.

The 5,000 acre Mount Rae between the Boulder and West Boulder Rivers is another area with aspen and meadows, and good wildlife habitat and should be Wilderness.

The 8,000 Tie Creek/Mission Creek/Livingston Peak including the north face of Shell Mountain with trailhead access near the 63 Ranch east of Livingston Peak provides the scenic backdrop to Livingston. Little Mission and Mission Creek both harbor genetically pure cutthroat trout. All of this area should be protected.

In Paradise Valley, much of the lower foothills of the Absaroka Mountains are not within the wilderness, the entire roadless terrain of 13,000 acres from Deep Creek to Strawberry Creek along the Absaroka Front should be added to the AB Wilderness.

Also, Chico Peak, Emigrant Peak and Dome Mountain 56,000 acre roadless reaches from Cedar Creek by Gardiner north to Passage Creek in the Mill Creek drainage. Except for existing mineral claims, the entire area should also be added to the AB Wilderness. These lands are critical migration corridors and winter range for elk and bison moving north from Yellowstone as well as important grizzly bear habitat. Six Mile Creek has pure Yellowstone Cutthroat trout populations.

BRIDGER RANGE

The Bridger Range is an important corridor between the Greater Yellowstone Ecosystem and Central Montana. Approximately 45,000 acres of the Bridger Range is roadless and should be proposed as Wilderness, especially the area around Blacktail Peak in the northern Bridger Range should be recommended for wilderness.

CONCLUSION

I appreciate this opportunity to submit these comments on this draft plan, and I appreciate all of the hard work that has gone into it. I feel strongly that for the many reasons described above, Alternative D is the obvious preferred alternative for Wilderness designation on the Custer Gallatin National Forest. And I have faith that the Forest will do the right thing for the long term well being of both people and the Custer Gallatin Forest ecosystems, and choose this alternative.