

Kathy A. Harris --- USDA Comments in support of Alternative D

I am commenting for my support of Forest Plan Alternative D emphasizing natural processes and restoration. Any alternative that reduces or alters the small percentage of National Forest that is designated Wilderness does not align with the best interest of sustaining and improving the Gallatin Range which comprises a very important piece of the Greater Yellowstone Ecosystem

Alternative D safeguards key wildlife habitat areas and secures an unbroken habitat link for a diversity of wildlife including grizzly bears, elk, moose, bighorn sheep, mountain goats, deer, pronghorn, and bison. It protects the Watershed and minimizes the acceleration of habitat degradation due to Climate Change.

Alternative D is the draft forest plan that will offer the best protection for the Gallatin Range and other critical wildlife habitat across the Custer Gallatin Forest recommending creating 39 wilderness areas totaling over 711,000 acres across the forest including the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (HPBH WSA) and 230,000 acres of wilderness within the Gallatin Range and additional designated wilderness including the Lionhead, Crazy Mountains, the Bridger Range, Cowboys Heaven, Deer Creeks, Lime Creek Plateau, Emigrant Peak, West Fork Rock Creek, Red Lodge Creek, Pryor Mountains and Tongue River Breaks.

Designating these areas as Wilderness provides maximum protection to these shared resources and ensures equal access to all; from people that live and work in Montana to Federal taxpayers across the US that all share “ownership” of these wild places. Other Forest Plan alternatives create an unequal playing field for access catering towards those that can afford to “pay to play”. This exploits these shared lands for the benefit of a few at the cost of the many. The costs are great as the wildlife and ecosystem are already challenged by the impacts of human activity. Designating these wild places as wilderness keeps them wild by ensuring human contact minimizes the foot print left behind.

It should be noted that Alternatives B and C propose legitimizing decades of illegal mountain biking and ORV use in the HPBH WSA. The S. 393 Wilderness Study Area SEC. 3 (a) states the wilderness study areas designated by this “ACT” shall, until Congress determines otherwise, be administered by the Secretary of Agriculture so as to maintain their presently existing (i.e. 1977 and prior years) wilderness character and potential for inclusion in the “National Wilderness Prevention System”

The Custer Gallatin National Forest (CGNF) is not the nation's woodbox, nor should it be the nation's outdoor gymnasium. What the CGNF does best is provide for high-quality Wildlands, Wildlife and Watershed ecosystem.

Highlights of the respective wilderness areas should include:

GALLATIN RANGE

The Gallatin Range is the largest unprotected roadless area in Montana and a key part of the Greater Yellowstone Ecosystem. The Gallatin Range portion of the CGNF stretches 50 miles from Yellowstone Park north to Bozeman including the popular Hyalite Canyon area. The FS identified some 251,700 acres in its Wilderness Inventory Polygon 28 which includes the Hyalite–Porcupine–Buffalo Horn WSA, but it is not all inventoried roadless a portion of the full Gallatin Range Roadless area which extends south into Yellowstone NP and takes in over 546,000 acres. The Gallatin Range higher elevations feature glacially carved cirques, and grassy ridges. There are a lot of open grassy valleys and slopes which are exceptional wildlife habitat, particularly the Porcupine–Buffalo Horn Drainage where thousands of elk winter. Three drainages—Mol Heron, Tom Miner, and Rock Creek— that flow from the Gallatin Range are considered essential Yellowstone Cutthroat trout habitat by Montana Fish Wildlife and Parks. The Gallatin Range also supports grizzly bear, wolf, mountain goat, wolverine, bighorn sheep, moose, mule deer, and potentially wild bison.

The largest petrified forest in the world is found at the headwaters of Porcupine, Rock, Tom Miner, and Buffalo Horn drainages. Commercial and amateur collectors have ravaged this world-class complex. Wilderness designation would help to halt this tragic damage. Since 1977 approximately 155,000 acres have been protected as the Hyalite, Porcupine and Buffalo Horn Wilderness Study Area. In total there are about 230,000 acres of potential wilderness with the Buffalo Horn drainage being the most important wildlife habitat in the entire Gallatin Range.

MADISON RANGE

A significant portion of the Madison Range is protected within the Lee Metcalf Wilderness. However, 111,000 acres in the Cabin Creek Recreation and Wildlife Management Area lies between the Taylor Fork and Hebgen Lake and is sandwiched between the Monument Peak area and the main crest of the Madison Range. This exceptional wildlands is without

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wilderness protection. It is critical grizzly bear habitat, and also could support wild bison herds. Nearly 50 miles of stream support West Slope Cutthroat trout. The FS does not recommend wilderness here because of on-going biking and ORV/snowmobile use, but that is no excuse. The area easily qualifies for wilderness based on its essential character and should be added on to 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. The area should be added to the Lee Metcalf Wilderness. Grizzly bears are utilizing this area. 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. Known as Cowboy's Heaven, it 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.

CRAZY MOUNTAINS

The Crazy Mountains have numerous peaks over 10,000 feet, including 11,201 foot Crazy Peak. The range also harbors 30 alpine lakes and even a few small glaciers. The range is well known for its geological radiating volcanic dike system and heavily glaciated peaks and valleys. The range is considered sacred to the Crow Tribe. The Crazy Mountains have been included in previous wilderness bills. The CGNF recommended no wilderness in the Crazy Mountains. Part of their rationale is that there are checkerboard inholdings in the range. However, the CGNF identified 90,690 acres as roadless, but split this into two units for no apparent reason. This is considerably less than the 135,500 acres the FS identified as roadless in the 1980s. Conservationists should insist that at least 90,690 acres be recommended for wilderness with the caveat that private inholdings should be aggressively removed through land trades or purchase.

Conservationists should recommend a 90,000 acre wilderness.

ABSAROKA BEARTOOTH WILDERNESS ADDITIONS:

There are many potential additions to the AB Wilderness. Starting in the East, there is the Line Creek Plateau near Red Lodge. The CGNF has recommended only 801 acres out of 32,983 roadless acres with some on the Shoshone NF. The plateau is so special that the FS has designated 16,127 acres as the Line Creek Research Natural Area. At least 30,000 acres should be recommended for wilderness.

The West Fork and Lake Fork of Rock Creek by Red Lodge and the Beartooth Front from Red Lodge to East Rosebud drainage comprise 34,640 acres of roadless lands adjacent to the existing AB Wilderness that includes 27 miles of trail. The West Fork of Rock Creek is the municipal watershed for Red Lodge. In particular, all the roadless lands in both the glaciated valleys of the West and Lake Forks of Rock Creek should be recommended as wilderness.

The 25,000 acre East Rosebud to Stillwater Roadless area along the Beartooth Front provides for the access to East and West Rosebud, as well as Stillwater trailheads. All should be protected as 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, which is mostly foothill terrain, is largely missing from the AB Wilderness. It 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

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

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.

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. 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 dramatic face of the Bridger Range walls in the eastern side of the Gallatin Valley. The Bridger Bowl Ski area is located on its eastern flank. The Bridger Range is an important corridor between the Greater Yellowstone Ecosystem and Central Montana. The range supports important winter deer habitat at lower elevations and its streams hold genetically pure West Slope Cutthroat trout and Yellowstone Cutthroat trout. Approximately 45,000 acres of the Bridger Range is roadless and surprisingly the FS did not recommend a single acre for wilderness. The area around Blacktail Peak in the northern Bridger Range has about a third of this roadless component and should be recommended for wilderness.

LIONHEAD (SOUTHERN MADISON RANGE):

The 32,000 acre Lionhead Roadless area includes 18 miles of the Continental Divide Trail and lies to the west of Hebgen Lake. The area is a critical corridor that links the Yellowstone Park area to the Lee Metcalf Wilderness. The CGNF has recommended nearly 18,000 acres as wilderness, but in 1986 Forest Plan had recommended 22,000 acres for wilderness. The Forest Service should include the Lionhead but recommended the wilderness should be enlarged to include most of the 32,000-acre roadless area.

Think like Bob Marshall, Olaus and Margaret Murie and Lee Metcalf. If citizens wish to protect the biological diversity and incredible wildlife attributes of the Gallatin Range, designation of this entire roadless area as wilderness is the only logical choice. Other proposals are only halfway measures that will result in half-way protection compared to

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wilderness designation. If we can't protect the most biologically critical lands in the Gallatin Range, with so much of Greater Yellowstone's wildness at stake, then where?

"Noted biologist Lance Craighead in his 2015 report on the Gallatins pointed out: "Disturbance due to human activities reduce the amount of habitat available for use by wildlife, increases stress, and depletes energy reserves, thus reducing the carrying capacity of the habitat: the best habitat for wildlife is found in areas with the least human disturbance."