

Review of the Custer/Gallatin Forest Plan

My approach to this review is a tad different from those you may receive. I tend to see things as good, bad or ugly in the plan. At the meeting in Billings it was noted that of the over 10,000 comments previously received during the plan review process, 9500 were form letters. I'm amongst the smaller group who feel strongly enough about the plan and the forest to take on the toils of reading, writing and composing their thoughts into letters with a personal touch and conviction, avoiding the too common conception of just being a ditto head.

Good points in the plan or suggestions for it:

1. The numerous meetings and web seminars concerning and explaining the plan itself was very good. The large scale maps during the meetings at the Big Horn Resort in Billings made things a lot easier to see and also to hear local residents, who use the forest due to proximity, voice their opinions and concerns. I was impressed by the special interest groups who showed up to forward their agenda but was not sure that some of them had all their oars in the water when I heard one person suggest at the last Billings meeting that the Beartooth Highway should be never have been built as it destroyed the wilderness environment.
2. The review period is necessary. Especially in depicting the Alternatives. I would say that this openness has certainly advanced since the Absaroka Beartooth Wilderness was created. The ability to look at the maps and to comment on the Alternatives through public input is vastly superior to the way the Absaroka Beartooth Wilderness boundary was created. That boundary was determined not by public input but by three individuals sitting down near Washington DC and drawing lines, without regard to private ownership in some cases, previous public input, mapping or existing uses. This type of mystical drawing of boundaries cannot be tolerated in this plan. The ability to object to the final plan resolves this back door type of manipulation.
3. The offering of Alternatives and the accompanying charts showing the results of these Alternatives in the EIS was needed. One can sit down and compare the impact of each Alternative on the public usage. The ability of the Forest Service supervisor to pick and choose items from each Alternative without fully adapting one totally outright is a good choice.
4. The period from initial publication of the process until the Fall of 2020 final determination provided sufficient time to look at the plan and realize that for the next 10 to 15 years this will be the cornerstone to determinations about the forest. As a student and teacher of history I envy Theodore Roosevelt and his conservation methods in forestry and reclamation. Multiple use of those lands and their benefit to all was one of his legacies that needs to be maintained. So far dark money and personal/financial interests have been minimal and I sincerely wish that the openness exhibited by all continues in this process.
5. While I abhor selling public lands, I do endorse the exchange of lands to create a more compact and enticing units in the forest landscape. Nothing that I have read or heard so far counters that belief.

6. The inclusion of bison, grizzly bear and big horn sheep concerns in some of the alternatives is a proactive stance as denoted in the Wildlife section of the plan. The Sage Grouse is worthy of consideration but too much emphasis has been put on that bird since it does not warrant under the Endangered Species Act. I believe that protection is needed but not to the extreme extent originally proposed.
7. The protection of riparian rights and water quality is needed and addressed in the plan under Watershed and Aquatics and Riparian Management Zones. It would be great if additional resources were made available to curtail the water quality being affected by the introduction of feces and other human impacts from backpacking or use of the back country. My last trip to Basin Lake was demoralizing, with the amount of trash being littered along the trail and especially the lake side. From fishing gear and line to clothing and paper products and fire rings, the abuse of the back country is increasing.
8. The Avalanche reporting system in use for the Custer/Gallatin is one of importance for all winter participants and I was happy to see that partnerships in training and SAR are to go forward.
9. Once this plan is finalized in the Fall of 2020 the production of new maps to reflect the changes approved by the plan must be of the highest quality and available both in electronic format and paper. Professional cartographers with a grasp for detail must be enabled to upgrade the maps. I do miss using feet as the demarcation for elevations and contour lines, but I understand that by 2022 it will become mandatory to switch to the metric system.
10. I totally support the Absaroka Beartooth groups who have envisioned the use of Trail Ambassadors to try and make backpackers and day hikers aware of the consequences of their misuse of the trails and forest. Pack it in and pack it out. Additionally, the volunteer work on trails, whether within the wilderness or not, is greatly appreciated by those of us gaining in years.
11. I applaud the Custer Gallatin NF for their pursuit and endorsement of the bicycle trail out of West Yellowstone. This trail is very appropriate for such use and the Hiawatha Trail in Idaho has shown that managed bicycle paths increase the enjoyment of families and even hikers to use the forest.
12. The recognition of damage to wild birds and other animals by the need to monitor and design wind energy development has been amiss in the pass and I'm happy to see it addressed along with others in the Wildlife goals.
13. Recreation Emphasis Areas (REA) is one of the best parts of the plan. All of the emphasis areas noted in Table 30 should be seriously considered for the final plan.

Bad points in the plan and concerns:

1. The lack of any new recreational sites, especially camp sites, is poor. With the population growing more campgrounds and picnic areas will be needed to alleviate the overuse of camping off site with the destruction of water resources, terrain and littering. The baby boomers are limited in the ability to hike or backpack and whether the forest service acknowledges it not, the increase in RVs and camping will make permanent indentures changes on the face of the forest. Setting aside more wilderness as denoted in Alternative D

will not help to alleviate these increasing pressures. The discussion of campgrounds and uncontrolled dispersed campsites under the heading of Standards (FW-STD-WLGB) left a lot to be desired. Reducing developed sites such as campgrounds based on a 1998 baseline will not offset any increases in human capacity. At my age I want to enjoy the outdoors but my back goes out more often than I do.

2. Areas of Tribal Importance is one of the subsections of the plan. The resolution by the Supreme Court of the United States concerning Indian rights on public lands, such as *Herrera vs Wyoming*, will cause significant changes to the forest plan. While those are unknown as to the extent, one can surmise that Indian rights to hunt year around, to collect Eagle feathers or plants and to transgress upon those public lands will alter many of the forest uses. Enforcement of state and federal laws may be particularly inhibited by such tribal rights. Since the court decisions reflect on the Crow Treaties from 1868 forward those lands affected may include all forest lands south and east of the Yellowstone River up to the 107 degrees longitude. Other interpretations may result in the public lands only adjacent to the current Crow reservation which would definitely include the Pryors in addition to the already affected Big Horn NF. Such unlimited year around access by the tribe for hunting rights or cultural gathering would have an impact on management of the forest. In the case of the Pryors, I would be hesitate to create any wilderness designation as access by tribal members in motorized vehicles may overrule roadless designations of any type. Until the courts have more time to specify the results of this and other tribal influence on public lands the Pryors should remain as they are.
3. I would have liked to see more discussion on the reduction of outfitters misuse of the back country, especially in wilderness in the Recreation Opportunities – Outfitter Guides. Although it was touched on briefly in Invasive Species the introduction of noxious weeds can be seriously affected by feed to the pack animals. I have encountered one outfitter out of Laurel who was really good in the sense they honored the back country. Another outfitter out of Big Timber guiding hunters on forest lands within the wilderness was not one of fondness. The camp site was like a miniature city, with large tents accommodating motel like benefits, the cooking area being a buffet status, washing and shower areas with disposal of chemicals unhindered, campfire rings left over from previous occupants and still in use and finally the stench of horse manure and the trails being widen by the continuous use of such animals. Bicycles, which are prohibited in the wilderness, would have made much less impact upon the trail system than this particular outfitter.
4. In many of the Alternatives selections it was noted that actions associated with them were restricted or conditional due to the lack of money in the budget. One way to provide more money may be to increase cabin rentals, make outfitters and special use partners contribute more to specific funding projects, turn over the administration of campgrounds to profitable companies, and have private enterprise create more recreational opportunities on a for profit sharing basis to expand opportunities.
5. Cuts to the budget of the Forest Service nationwide will result in less emphasis being placed on the actual boots on the ground personnel.

6. I may be amiss in my opinion, but the amount of money, time and personnel expended in the preparation of the plan seems to be expansive. Having visited the Billings office and looked at the three ring binder there on this plan I was amazed at its thickness. Ads in Craigslist asking for volunteers to scan the plan document to raise prejudice concerns was a necessity for many proactive organizations who had the money and paid staff to pursue each page. For the common recreationist it was a towering task. Thus while my interest were many, I did not have the time to read the entire document. On the other hand I really appreciated the condensed graphs and descriptions of the Alternatives.
7. As for timber cutting I still believe that such endeavors are needed to help employment, alleviate some of the fire danger and insect damage and improve the forest itself with new growth. I have only one suggestion for the forest service personnel involved in such tasks. As a benchmarking enthusiast I have seen where the timber harvest crews have obliterated the survey markers in those portions of the forest subject to their machines and cuttings. It would be wise to mark these corners, whose destruction is prohibited by law with fines accompanying such, by the forest service to prevent their destruction. Where such destruction takes place the BLM or appropriate government accredited surveyor must re-monument them.
8. I was elated to see that the Custer Gallatin, which already has 293 recreation residences, will not make any new ones available. While my preference would be to eventually cancel all these leases I would hope that forest service personnel endeavor to prevent the “gated community” effects such as that on Snow Creek outside of Red Lodge. Over the past years I have observed, and photographed on occasion, where the access gate to those cabins has been locked on several occasions inhibiting use by the public and creating a private environment.
9. I’m not quite sure how Fires and Fuels management can be conducted in Alternative D on 7,000 acres per year when no mechanized equipment is available to contain a fire that size. I did not sense that the problem of Wildland Urban Interface was being addressed.
10. The Road and Trails (RT) plan objectives are fine as far as concerns Alternatives B, C and E. Alternative D under 02 of the objectives is way too prohibitive.
11. The Vision for the Absaroka Beartooth Mountain Geographic Area notes that with Designate Wilderness encompassing 68% of the acreage and Roadless Areas another 20% that 88% of that area is for all purposes wilderness environment. The Alternative D map on-line showed that the new wilderness would certainly increase that percentage over 90. That is overkill.
12. While the sheet explaining the Alternative Key noted that plan direction would be consistent with existing travel plans, that is a misnomer. The Alternatives, especially D, all will impose even more restrictions on any motorized or wheeled use (bicycle) than is now in place. The key did say that if specific travel decisions are needed to bring the travel plan into compliance they would occur after the plan decision. My only comment here is that if changes do occur to the travel plans that the past legal decisions be adhered to.

Ugly points in the plan:

1. In the handout given at the public meeting in Billings it was noted that the private rights of landowners are not affected by the plan. Yet in the Crazy Mountains the Alternative to create a wilderness within checkerboard land parcels directly contradicts this statement. The designation of checkerboard lands within a wilderness could lead to costly lawsuits. It is somewhat confusing that the Alternative for the Crazy Mountains is even considered when the plan itself quotes "the Forest Service has little control over the access and mineral activities for these private mineral rights (pg.85 revised plan). The surface and subsurface may be both privately owned, especially if the original Northern Pacific Railroad reserved those mineral rights. Access to both surface and minerals rights could be restricted by such wilderness designation. While many Montanans fight for water and land access, sometimes bitterly with large out of state landowners, this proposed checkerboard pattern is a step away from those hard fought victories. However, the checkerboard pattern being proposed for wilderness may also lend itself to certain influential private owners securing assurances of never having to worry about, or file suit over, public access to the forest. This ploy would basically create a private withdrawal to their betterment and the public's detriment. Section 2(c) of the Wilderness Act defines wilderness as an area that "...has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition..." Section 2(c) of the Wilderness Act requires that an area qualified for designation "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable." It also states that wilderness is "...an area where the earth and its community of life are untrammelled by man..." and that it retains its "primeval character and influence." This checkerboard pattern does not fit the letter or intent of the Wilderness Act, as these acres would not be contiguous. If one says that the forest lands around the private lands in this pattern are contiguous I would point out that corner crossings are not recognized as valid in this state.
2. The proposal to create huge amounts of new wilderness or wilderness study areas in Alternative D has the potential for detrimental effects. One only needs to pick up Realty pamphlets to see that many properties near forest boundaries with existing or proposed wilderness have increased hugely in price, sufficing to benefit only the richest of Americans who can afford to have the luxury of a backyard with no concerns as to development and the ability to restrict access to that wilderness for their own personal pleasure and use. The back country hunters, anglers and outfitters stand to reap large monetary benefits from such massive wilderness or wilderness study areas. Why not propose a slower pace instead of performing a land grab of such magnitude as to benefit a select few.
3. Wilderness Study Areas in essence become de facto wilderness. With Congress unable to release study areas that have previously been identified over the decades as not meeting the wilderness criteria the addition of more wilderness study areas is a backdoor approach to withdrawal of lands from any multiple use criteria. The number of specific type special withdrawals proposed in the plan, from wilderness to wilderness study areas, to back country areas to roadless areas and many more makes me wonder if anything will be left for the benefit of the masses after taking into consideration the special interest involved in each denotation.

4. Alternative E does not allow the Stillwater Mining Complex to expand or even be considered for planning purposes. Once again I would quote from the plan "A part of the Forest Service's mission is to encourage, facilitate, and administer the orderly exploration, development, and production of mineral and energy resources on National Forest System lands to help meet the present and future needs of the nation (pg 85 of the revised plan). The Energy, Minerals and Geologic Areas of Interest discussion in the plan does state that U.S. citizens are guaranteed the right to prospect and explore lands reserved from the public domain and open to mineral entry. Must the forest service be reminded that the Mining Law of 1872 preempted the creation of many forests and that existing rights under it are valid. But more to my concern is that fact that the forest service would target what may be considered strategic minerals for the United States as of no concern in Alternative E. Perhaps the forest service should ask Exxon Mobil how much they have to rent Palladium from the World Bank for use at the Billings refinery since outright purchase is beyond the scope of that process. To lose the ability to produce these metals, including also Platinum and Chromium locally and become dependent upon other nations is extremely difficult to digest. These minerals have been identified as of great importance and significance to this nation since the USGS 1993 Mineral Assessment. In the Pryors the deposits of Uranium should also be considered before any massive withdrawals of either wilderness or wilderness study areas are condoned.

I appreciate the opportunity to comment on the plan. My personal choices would be to institute the majority of Alternative B, followed by parts of Alternative E and C. Alternative D is the least acceptable as it represents the largest withdrawal of public lands from multiple use.

Keith Kolstad