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May 22, 2019

Forest Plan Revision Team
Custer Gallatin NF

Dear Virginia and team –

Thank you for the opportunity to comment. It's obvious you've done strong work, and I appreciate all the informed passion that's gone into the work.

Obviously I am not as deeply engaged as I once was, so I don't feel like I can provide substantive comments on the wide variety of things I care about, but I will provide a couple of specific comments to start with, then close with some overall comments.

I am very interested in the land designation for the front-country portion of the Beartooth District on the NE side of Ski Run road. Although I authorized construction of the Palisades Trail through that country during my tenure there, it was with the recognition that it is a wildlife management area, and there is still evidence of extensive wildlife use in that area, with regular sightings of black bear and moose, and even grizzly bear. I heard grouse drumming up there just this week. I worked with the biologist and FWP to institute mitigation measures to reduce impacts of the trail to wildlife. My interest is in maintaining the quality of wildlife habitat in there. I would be concerned about implementing a recreation emphasis in that area, beyond what's already been done.

I am very intrigued with the use of the backcountry prescriptions proposed for Trout Creek and the Pryors. Throughout my career, I've always thought there was a gap between full Wilderness designation and areas open to multiple uses. I think there might be places that could accommodate mountain bike use, as a quiet use closer to towns like Red Lodge, but would also respect decisions to limit mountain bike use, especially in more remote areas.

I think a good place to allow mountain bike use would be the low country around Meyers Creek, or similar Forest Service rental cabins. I used to hear people argue that non-motorized users had Wilderness, and everything else should be open to motorized. Please recognize that Wilderness is high elevation, with a very short season, and in order to spread use around, it's beneficial to designate some non-motorized areas in low-elevations like Meyers Creek or the Old Ranger Trail identified in the Red Lodge Mountain Land Exchange, to expand opportunities in the shoulder season. (Please forgive me if I'm wandering off into travel planning...) Also, please don't always relegate mountain bike use to motorized areas. Mountain bikers are looking for a quiet, human-powered experience.

With respect to the Pryors, I prefer the backcountry designations. This plan will have a long life, with rapidly expanding population growth likely to affect the Pryors. I support the vision you have outlined for the Pryors, as I have often found more solitude there than in the more popular AB Wilderness.

I recognize this is outside Forest Planning, but I think there still remains a challenge to edge-match travel plan decisions with respect to the Meyers Creek and Lodgepole Trails near Meyers Creek WC. Hopefully decisions made during Forest Planning won't preclude options there.

Which gets me to my more general comments. I support all efforts to promote intact ecosystems and that allow for management in the face of emerging science. Future managers will need to be able to adapt management to provide for the most resilient ecosystems, so again, I hope we don't preclude options for maintaining intact systems. It was nice to see the mention of beavers in the riparian section.

I'd like to see as much emphasis as possible on restoration work in areas that have been impacted by invasive species, and I'd like to see as much done as possible to prevent the growth in invasive species.

With respect to Wilderness, please do everything you can to maintain the Pristine character of wilderness. Let people practice using wilderness skills, without signs directing them, or bridges to "protect" them. Please limit infrastructure. Where resource damage is occurring, please be creative with solutions.

Again, this is a remarkable effort, and I congratulate you on all the good work.
Go gently –

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