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First name: Patti

Last name: Steinmuller

Organization: self

Title:

Official Representative/Member Indicator:

Address1: 952 Knolls Drive

Address2:

City: Bozeman

State: MT

Province/Region:

Zip/Postal Code: 59715

Country: United States

Email: psteinmul@msn.com

Phone: 4062192315

Comments:

CGNF DEIS Comments

I am a Bozeman resident and avid hiker, cross-country and backcountry skier, wildlife and wildflower viewer and frequent visitor to trails in the Custer Gallatin National Forest and especially those in the Lee Metcalf Wilderness, Bridger Range, and Crazies. I appreciate the work of the Custer Gallatin National Forest (CGNF) planning team and the opportunity to comment on the DEIS for the Custer Gallatin National Forest.

Overall Comments:

Gallatin Forest Partnership Agreement: I have hiked extensively in the Gallatin Range and strongly support the Gallatin Forest Partnership (GFP) Agreement (<http://gallatinpartners.org/>) in the Gallatin and Madison Ranges and urge its full implementation. This agreement was developed over several years by a diverse group of stakeholders (hikers, mountain bicyclists, hunters, anglers, backcountry horsemen, wildlife viewers, backcountry skiers, natural resources professionals, conservationists, guest ranches, and others) that focused on creating land management solutions that benefit the landscape, wildlife, the greater Yellowstone ecosystem, and the public for now and future generations.

Although Alternative C encompasses some recommendations in the GFP agreement, I support full implementation of the GFP that includes 124,000 acres of recommended wilderness in the Gallatin and Madison ranges, the Hyalite Watershed and Recreation Area, the West Pine Wildlife Management Area, and the Porcupine Buffalo Horn Wildlife Management Area.

The 2012 forest planning rule encourages collaborative efforts by citizens in the forest planning process. I participated in an earlier collaborative effort, the Gallatin Community Collaborative (GCC). Although the leadership and participants worked hard, listened to each other and learned a lot in the process, the GCC was ultimately unable to reach consensus regarding recommendations for the forest plan revision to provide to the Forest Service. However, a persistent and determined group of diverse stakeholders from the GCC formed a new collaboration and invited others to join them. Over time, many meetings, research, listening, focus, and hard work, the GFP emerged, strengthen, and submitted recommendations to the Forest Service for forest planning in the Gallatin and Madison ranges. Working together, the GFP had the forethought to focus beyond the present and into future conditions, their potential impacts, and how to maintain shared conservation, wildlife, wilderness, and recreation values for future generations. Support of the GFP was gained when the County Commissioners met at its May 21 meeting. A public hearing was held, and the Gallatin County Commission voted unanimously to send a letter to the forest service in support of the GFP. Gaining support by elected county officials attest to fact that the GFP is a balanced approach that serves the interests and values of those living in Gallatin County.

Recommended Wilderness: I support the areas that the GFP proposes for recommended Wilderness in the Gallatin Range and Madison Range with expansions to include the northern part of the Gallatin Crest to Hyalite Lake, Cowboy Heaven, and the Big Creek watershed on the east side of the Gallatin range. I encourage designation of these three areas in the Pryor Mountains as recommended Wilderness: Big Pryor Mountain (~12,000 acres), Bear Canyon (~10,000 areas), and Punch Bowl (~8,500 acres).

Management of Recommended Wilderness: I recommend allowing only foot and horse travel as application of a [ldquo]primitive[rldquo] Recreational Opportunity Spectrum (ROS) in recommended Wilderness. I support management direction for Recommended Wilderness Areas that is consistent with designated Wilderness, i.e., prohibiting motorize and mechanized uses, both of which are not consistent with the Wilderness Act. Thus, non-conforming uses should not be allowed in recommended wilderness areas. Technological innovations in recreational transport, such as fat tire bikes and electronic assist mountain bikes are advancing opportunities for human travel. The Forest Plan must consider that technological innovations such as these will continue. The opportunities that I and others have had and continue to enjoy for wildlife viewing and primitive recreation deserve to be protected and managed for sustainability. This is another reason why non-conforming use should not be allowed in recommended wilderness areas.

Buffalo Horn Backcountry Area: The Buffalo Horn Backcountry Area designation lacks enough protection to the wildlife using the area. The Gallatin Forest Partnership Agreement recommends a Porcupine Buffalo Horn Wildlife Management Area with ample allowance for recreation but stronger wildlife protection.

Wild and Scenic Rivers recommendations: I support the recommendations made by America Rivers. Native fish rely on habits of cold, clear streams for sustainability. The forest plan needs to identify the ways in which fish refugia will be protected.

Wildlife Sustainability and Connectivity: The forest plan needs to be more specific in stating measurable standards regarding how wildlife connectivity and management of the landscape for wildlife are to be enhanced. Specifics. An example is the Porcupine-Buffalo Horn drainage where many elk winter. Another example is the expansion of grizzly bears in the landscape. In addition to grizzly bears, the Gallatin Range supports, mountain goats, bighorn sheep, wolverine, wolves, moose, and mule deer. I recommend that the Desired Conditions address the following issues. The landscape needs to be managed with wildlife as a high priority. Actions need to be taken to minimize human conflicts with wildlife. A substantive action would be to close certain landscapes from human transport during wildlife calving seasons.

#### Specific Comments by Area

Hyalite Watershed Protection and Restoration Area (70,000 acres): Especially since the Hyalite watershed is the major water source for Bozeman and is an extremely popular recreation area in all seasons to the year, I recommend that this area be given a special designation and management goals to protect the Hyalite and Bozeman Creek watersheds and ensure clean water and a reliable, sustainable water source for Bozeman. Although a prime recreation area and one that I visit in all seasons, I recommend management to protect its wild character, wildlife habitat, and wildlife connectivity. Considering the fast pace of population growth in the Gallatin Valley, I favor development of a fee-based system such as an annual pass, parking permit or similar for recreational use of the Hyalite Watershed Protection and Recreational Area. The funds collected could be used for trail maintenance, infrastructure improvements, and enforcement. I recommend that this area be withdrawn from any existing mining claims. I recommend maintaining existing trails but that no additional trails be developed in this area.

Gallatin Range: I support the GFP agreement request that the Forest Service designate the 102,000 contiguous acres between Yellowstone National Park and Hyalite Peak as recommended wilderness. This would ensure north-south connectivity for wildlife. The proposed area encompasses the entire Big Creek drainage, Rock Creek, and Tom Miner basins [ndash] all of which include a diversity of lower elevation habitat and significant densities of grizzly bears. This area all supports elk, moose, wolves, wolverines, and other small and large wildlife. Yesterday hiking Dailey Creek to Teepee Creek trails, I was a member of a group of hikers who saw a band of elk below the Gallatin crest and a bull moose in a meadow above the Teepee Creek. Being the first trail to the north of Yellowstone National Park and currently unprotected, Teepee Creek deserves recommended wilderness designation as indicated in the GFP agreement.

Madison Range: I support the GFP agreement that includes recommending the 16,000 acres of wild, roadless area known as Cowboy Heaven as recommended Wilderness. I hiked to Cowboy Heaven from Bear Trap Canyon last summer and appreciate the ruggedness, scenic beauty, and the areas wildlife habitat that deserves protection. Making this addition would connect the Spanish Peaks and Bear Trap Canyon units of the Lee Metcalf Wilderness. This would addition also adjoins a recommended wilderness unit on the Beaverhead Deerlodge National Forest immediately to the west. Making these revisions to recommended Wilderness would

benefit wildlife, wildlife habitat and corridors, and help maintain wilderness character. I also support Quake Lake in the Madison Range as additions to the Lee Metcalf Wilderness Area.

**Crazy Mountains:** I encourage the forest service planning team to respect the recommendations of the Apsaalooke (Crow) Nation regarding the cultural and sacred role of the Crazy Mountains to the identity and spiritual life of the Crow. Use of the mountains for historical and contemporary vision quests are of utmost value to tribal culture. I urge the Forest Service to consider the Apsaalooke Nation as the central stakeholder in the Crazy Mountains and that the Crazies be managed in close coordination with the Apsaalooke Nation. I have hiked and backpacking in the Crazies and can attest to the magnificence, outstanding beauty, and serenity of Cottonwood Lake and Campfire Lake trails and the trails leading to these lakes.

I support the Apsaalooke (Crow) Nation recommendations regarding the following:

- disallow expansion of motorized trails and motorized travel in the Crazies
- disallow mining, road building
- disallow construction of new utility or energy corridors
- disallow development of additional recreation sites or facilities for recreations.

I support allowing only foot and horse travel as application of a [ldquo]primitive[rdquo] Recreational Opportunity Spectrum (ROS).

I also support consideration of the 82,000 roadless acres managed by the CGNF in the Crazies as an option for recommended Wilderness designation, especially in areas where opportunities for solitude and primitive recreation exist. I have hiked and backpacked in the Crazies and have experienced the uniqueness of wilderness character and stunning beauty of this island mountain range. I appreciate that the wildness, rugged peaks, mountain valleys, and alpine lakes of historic, cultural and religious significance to the Apsaalooke Nation. The DEIS fails to provide desire conditions that address action to preserve these unique characteristics. Due to the wild character and rugged terrain, I recommend managing the Crazies as recommended Wilderness and acknowledge the landscape for its cultural and spiritual significance.

The Crazy Mountains deserve status as a special management area. An option is to establish a Special Emphasis Area to address the cultural significance for the Apsaalooke Nation and wild character of this island range. I recommend a Desired Condition to address this situation. An example is declaration of a Special Emphasis Area for the Badger-Two Medicine by the Helena-Lewis and Clark Nation Forest.

**The Lionhead (or Henry[rsquo]s Mountains):** The Lionhead links the Greater Yellowstone Ecosystem and the High Divide. I recommend maintaining the existing 22,800 acres of recommended Wilderness in the Lionhead as stated in Alternative A. I urge that travel management to allow for only foot and stock use to enable eligibility for Wilderness designation by Congress.

**Absaroka-Beartooth Wilderness:** I have backpacked and hiked in the Absaroka-Beartooth Wilderness many times support the following roadless areas as recommended wilderness: Chico Peak, Emigrant Peak, and Dome Mountain, Woodbine, East Rosebud to Stillwater, and Red Lodge Creek as indicated in Alternative D. I support prohibiting mechanized and motorized recreation in the Bad Canyon of the Absaroka-Beartooth Geographic Area as proposed in Alternative B.

**Pryor Mountains:** I support the recommendations of the Pryors Coalition (<http://www.pryormountains.org/>) for the Pryor Mountains, an island mountain range that is unique in terms of geology, ecology, and biology as well as being culturally significant to several Native American tribes, most notably, the Apsaalooke (Crow) Nation. The Pryors are especially significant to the Crow for medicinal use of plants, some of which are endemic to the Pryors.

I support Alternative D in the DEIS for the Pryors which proposes the following acreage as recommended wilderness:

- Big Pryor Mountain RWA 12,737 acres
- Bear Canyon RWA 10,366 acres
- Lost Water Canyon RWA 12,992 acres
- Punch Bowl RWA 7,766 acres

Each of these areas is distinctly different. Each contains wilderness characteristics, substantially unnoticeable developments, and opportunities for solitude and for primitive recreation. As an example of the diversity in the Pryors, the 2012 Rocky Mountain College BioBlitz in documented over 800 plant and animal in only 24 hours in an area near Crooked Creek. Agency recommended wilderness and ultimately Wilderness designation would be the best way to preserve the ecosystem, wildlife habitat and wildlife corridors, and protect the flora that is unique to the Pryor Mountains.

Characterizing of all but Lost Canyon as Backcountry Areas (BCAs) is unfortunate because these other inherently wild areas are more appropriately recommended as wilderness. Additionally, the BCA term is not defined and open to being reinterpreted in the future. The wildness of these acreages deserves permanent protection to maintain current wilderness characteristics. One goal stated in the CGNF DEIS is for the BCAs to maintain current management which dates to the 1986 Management Plan. This outdated management plan is totally inadequate for 2019 and the future 15-30 years in which the new plan is expected to be in force. An updated detailed forward-looking management plan is essential.

Recreational use is one example that provides evidence why a management plan addressing recreation needs to be defined for the Pryors. An opportunity for motor-free recreation would be available in an RWA designation. Ample opportunities already exist in the Pryors for motorized and mechanized recreation. Nearly all currently existing routes would remain following RWA designation of the 4 RWAs as proposed in Alternative D. Increases in technology, such as electric mountain bikes are already available and would turn the formerly mechanized mountain bike transportation into motorized recreation.

Since the ecological diversity of flora and fauna of the Pryors is unique, the Pryors deserve specific management directives that align with the ecology of the area. For example, several species of plants occur only in the Pryors and nowhere else in the world. To maintain the diversity and integrity of these unique communities requires management directives that match the characteristics of the ecological systems of the area. Since the 2012 Forest Service Planning Regulations require that the diversity and ecological integrity be maintained, management directives specific to the Pryors are required to achieve these requirements via ecological management directives specific to the Pryors.

A Desired Condition that sets a holistic approach to management of the Pryors is desired. Consistency in management among the FS, Bureau of Land Management (BLM), and the Bighorn Canyon National Recreation Area (BCNRA) is logical and critical for maintaining the ecological health and uniqueness and diversity of the landscape. For example, migrating animals show no concern for transitions in boundaries or landscape management. Thus, consistent management should ideally exist across boundaries between the FS, BLM, and BCNRA. The fact that the BLM and BCNRA have identified nearly half of the land they manage as Wilderness, adds credence to the rationale for increase in recommended Wilderness stated earlier.

Ashland Ranger District: This district represents a very large largest contiguous area of federally managed land in eastern Montana. I support recommended wilderness for the Tongue River Breaks, King Mountain, and Cook Mountain as indicated in Alternative D. Recommended wilderness would protect these natural landscapes and the cultural values and indigenous cultural values of the Sioux, Crow, and Cheyenne. Grazing permits of ranchers would continue within recommended wilderness designation.

Sioux Ranger District: Considering the archeological and paleontological resources and the many opportunities for solitude and quiet recreation in the Chalk Buttes, I recommend that the Chalk Buttes be managed as a BCA with motorized and mechanized recreation prohibited, as stated in Alternative D.