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Comments:

May 28, 2019

Custer Gallatin National Forest  
Bozeman, Montana

Re: Custer Gallatin National Forest draft plan

Dear Forest Supervisor,

I appreciate the opportunity to comment on the Custer Gallatin National Forest draft plan. The areas I am most familiar with are in the Custer Forest including Chalk Buttes near Ekalaka, the three "Hiking and Riding" areas in the Ashland District - Tongue River Breaks, King Mountain, and Cook Mountain, and the Pryor Mountains. I have hiked in all of these areas.

1. Chalk Buttes is one of the most scenic areas on the Great Plains. It also has a long history of human use as evidenced by a medicine wheel, artifacts, and oral histories that have been passed along. This area is of special importance to the Sioux and Northern Cheyenne tribes and it has been under study as a traditional cultural landscape. Despite its scenic beauty and historic significance, it still lacks a protective designation. Chalk Buttes remain an oasis on the prairie and should be managed primarily for its scenic and historic values. Most of the national forest and BLM lands in the southeast Montana are managed for other values.

I appreciate the Custer Gallatin National Forest planning team for recognizing the importance of this area in Alternative D, as a Back Country Area, and I support that proposed designation, but ask that their management be based in an on-the-ground understanding of this place. Motorized and mechanized recreation are neither in demand nor suitable for this unit. I ask that the BCA be managed for non-motorized and non-mechanized primitive recreation only, with vehicle use limited to the existing road leading to the cabins. The remainder of the Buttes should be managed to protect its wilderness character. The BCA designation should also prohibit communication towers, transmission lines and new roads. Only with these types of protective measures will Chalk Buttes remain a hidden jewel on the prairie and provide important opportunities for eastern Montana and South Dakota communities to access national forest lands for quiet recreation.

2. The Tongue River Breaks, King Mountain, and Cook Mountain have retained their wilderness character largely because they have been managed as Hiking and Riding Areas. There is no designated Wilderness in southeastern Montana so for the sake of balance, these three rugged and scenic areas should be managed as "Recommended Wilderness" to ensure that they remain one of the few areas in southeast Montana managed to protect their wilderness character provide a place for the public to experience a primitive recreation experience.

3. The Pryor Mountain range is unlike any other landscape in Montana - semi-arid deserts, broken foothills, limestone canyons, caves, thick forests of Douglas-fir, sub alpine plateaus and high mountain meadows - all in the same mountain range. The Pryors are also known among botanists as a "biological hot spot" because of the many rare plants found in the area. It is an ideal outdoor laboratory for the study and teaching of natural history.

Equally significant is the area's human history. For thousands of years the Pryor Mountains and surrounding area have been utilized by Native Americans and are rich with cultural and historic resources. The many petroglyphs, sacred sites and concentration of tipi rings attest to the significant role the Pryors once played and continue to play in the life of the Crow Nation.

Today, the Pryors continue to be a place where all people can find solitude and inspiration. Within the range are four designated Wilderness Study Areas and three Areas of Critical Environmental Concern designated to protect cultural and archeological resources. The Pryor Mountains are also home to the first wild horse range created to protect wild mustangs.

As noted in the draft EIS:

"The national forest portion of the Pryor Mountains contains a unique and diverse assemblage of botanical resources and plant associations within a relatively small area. The Pryor Mountains are important for scientific study and education. Due to the exceptional diversity in a small area, many researchers and educators in earth sciences have recognized its scientific value. Because of a unique convergence of three floristic provinces (Northern Great Basin, Middle Rocky Mountains, and Northern Great Plains), the Pryor Mountains are considered a "botanical hotspot," rich in species and community diversity. More than 400 plant species can be found here. Many rare plant species in the Pryor Mountains are associated with the Madison limestone geology of the area." (Draft Plan, page 147)

The Pryors also provide a mix of recreational and commercial uses including hunting, mining, and livestock grazing. Access for vehicle use is extensive. With changing patterns of use have come changes in the natural and historic resources that make the Pryors unique. Cultural sites have been vandalized, noxious weeds are spreading and becoming better established, native vegetation is being impacted, and opportunities for quiet recreation are being reduced. An expansion of mining activities could also lead to greater impacts.

As one of the most diverse mountain ranges in Montana they need a higher level of protection than the Forest Forest has provided.

The Lost Water, Big Pryor, Punch Bowl, and Bear Canyon roadless areas would best be managed either as Recommended Wilderness or a Backcountry Area designation that provides stronger protective measure that would genuinely protect wilderness character. Managing all of these roadless areas as Recommended Wilderness would still allow most of the existing motorized and bike routes to remain. Landscape and ecosystem types existing in the Pryor Mountains are either underrepresented or not represented in the National Wilderness Preservation System.

Other areas and components of the forest that deserve special attention include:

4. Crazy Mountains - Preserve their outstanding wilderness values and manage the area in close consultation with the Crow Nation.
5. Implement the Gallatin Forest Partnership agreement
6. Maintain the boundaries of the current recommended Wilderness in the Lionhead
7. Retain areas currently recommended for Wilderness in the Absaroka Beartooth area, and additionally recommend Dome Mountain, Emigrant Peak, Chico Peak, Woodbine, East Rosebud to Stillwater, and Red Lodge Creek.

As with all of Recommended Wilderness, these areas should be managed just like designated Wilderness, allowing only foot and horse travel and not allowing any mechanized or motorized use.

I sincerely appreciate the opportunity to comment on the proposed action and hope you find these comments helpful, informative, and useful in deciding how best to manage the area.

If you have any questions or comments, or wish to discuss the issues raised in this comment letter in greater detail, please do not hesitate to contact me.

Sincerely,

Mark Good  
Great Falls