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Thank you for your time and effort in this complex planning process.

This letter is in response to your request for comments on the DEIS for the Custer Gallatin National Forest. The following comments apply to the Forest Service managed portion of the Pryor Mountains.

*I first went to the Pryor Mountains in 1972 and have returned many times over the years in various roles.**

My greatest interest/concern is that the Pryor Mountains be managed to ensure the multiple, interdependent and complex ecosystems of flora and fauna flourish now and well into the future.

The Pryor Mountains are a unique and distinctive landscape. Those characteristics are based on a foundation of limestone and limestone-based soils which allow each plant or animal to thrive with its own distinctive expressions of life. By interacting with and using their neighbors, a complex ecological strata emerges, forming yet another layer of life and resources (not necessarily all economic) with great value to us humans.

The Pryor Mountains' priceless resources include air cleaned by forest vegetation and water, filtered, cleaned and stored in the soil, limestone cracks and crevices. Trees and other forest vegetation challenge climate change by removing carbon from the air and storing carbon in root systems. In light of current and impending climate change, the Pryor Mountains will be a refuge for plants and animals that are being pushed out of their historic range.

While this natural landscape has value to communities and people around the Pryor Mountains, there are other considerations. The Pryor Mountains are of great importance to the Apsaalooke - the Crow Nation, historically, culturally, as source of food and medicine, a refuge in times of conflict and a place of worship - a church. To a lesser degree, other Native American nations have historical and cultural connections to the Pryor Mountains.

Need to Change

It is time for a new Forest Management Plan - one capable of functioning effectively to 2045 and possibly beyond. CGNF must anticipate challenges to the ecological integrity of the Pryor Mountains now, and plan wisely to meet them over the years.

***ALTD** would be the most effective guide/plan for that challenging task of restoring the landscape and environment to their desired future condition.*

* What was I doing in that time?

- Enjoying the Pryors** – Caving, mountain biking, picking chokecherries, stargazing, car camping, hiking, backpacking, botanizing, geologizing, wildlife viewing, participating in public meetings and actions; BioBlitzing
- BLM/FS volunteer** –pulling knapweed, organizing weedpulls, leading hikes, rehabilitation of unauthorized two tracks, ground truthing cave surveys; helping with bat surveys;
- Custer NF employee** - Lands and ROW acquisition, fire suppression.

The Pryor Mountains are a connection between the Beartooths and the Big Horn Mountains, providing a route marker and stop-over for migratory species such as ungulates and avian species.

*National Forest System Lands (NFSL) are making a transition from being a source of commodities to being a host for the public. Contrary to a somewhat common belief, people are an integral part of the earth's web of life. They must take care and responsibility to avoid harming Earth's ability to function properly. It is critical that the Forest Plan make wise and thoughtful choices in determining management actions. **Alternative D** is the best of the Alternatives to guide those choices.*

More and more people want part of NFSLs, either for play or business use. Unfortunately, the number of people attempting to have a piece of the National Forest land is steadily increasing as the human population explodes. The largest city in the state, Billings, is home to many who go to the Pryor Mountains. Billings provides a ready source of equipment and supplies for trips to the Pryors. Regretfully, neither the size of the Pryor Mountains or the Earth is increasing. That means there are fewer and fewer acres per human. We also face a loss of the Earth's surface - a result of human misuse and climate change destruction.

*As more people with diverse interests want a part of the Forest, the terms **recreationist, recreation, road/trail, motorized /mechanized and nonmotorized/mechanized** are used to aggregate users into one large group. Those terms with interests so disparate that visitors cannot all be satisfied and still maintain ecological integrity of the Pryor Mountains.*

*Actually the terms to describe Forest users should be **consumptive** and **non-consumptive**. Machine noise consumes the resource of silence and precludes the experience of solitude. Motorized/mechanized travel disturbs wildlife and cover for bears, sage grouse and ungulates, threatens rare plant communities, causes erosion of soils and loss of clean water. The Plan should provide guidance to protect the resources, NOT carve up the Forest for different user groups.*

*For best protection of all CGNF Recommended Wilderness Areas, the Planning Team should **choose Alternative D**.*

It is critical to remember that the Pryor Mountains themselves are an entity that must be considered at the decision table. In fact, the Pryor Mountains should be seated at the head of the Decision Table. When demand for resources exceeds resources available, the Pryor Mountains should be satisfied first. Other would-be users must get a smaller share. Let's not kill the goose that lays the golden egg.

What is best for the Forest Service portion of the Pryor Mountains?

*The Plan must recognize the importance of natural processes and restoration, especially in regard to Climate Change issues and invasive threats such as noxious weeds. **Alternative D** provides the best direction.*

***The Plan, based on Alternative D**, would acknowledge the complex and diverse ecosystems that make up Pryor Mountains by designating and managing approximately 43,000 acres of CGNF in the Pryor Mountains as Recommended Wilderness Areas:*

*Big Pryor – 12,700 acres
Punch Bowl – 7,700 acres*

*Bear Canyon – 10,300 acres
Lost Water Canyon – 13,000 acres*

Mechanized and motorized activities should not be allowed in Wilderness or Recommended Wilderness Areas

The best plan would protect the botanical values of the three converging plant zones by designating a Special Botanic Area that preserves special plant communities. CGNF also recognizes the value of the Pryor Mountains for the Audubon designated Important Bird Area to migratory birds.

***Airstrips** or what might have been airstrips in the “Old Days” threaten ecological integrity and are a source of noxious weeds. Neither the weeds nor the airstrips have a place in the CG National Forest.*

***Backcountry Areas** are not an appropriate management designation or use for lands on the FS portion of the Pryor Mountains. The term is vague, unclear and is rarely used on other Forests. Based on comments from FS personnel, management of backcountry areas would be “status quo”.*

*Please do follow the advice of **The Pryors Coalition** and designate approximately 43,000 acres in the Pryor Mountains as Recommended Wilderness Areas.*

Please Follow the Planning Rule guidance

“Recommended wilderness areas are ... important for species diversity, protection of threatened and endangered species, protection of watershed, scientific research, and various social values.” (CGNF Draft Plan DEIS, Volume 1, page 813)

When the Decision Maker creates “Big Picture Rules for CGNF,” I fervently hope all entities involved will use the best science to do what is in the best interest of the Pryor Mountains’ ecology and landscape. Please follow the spirit as well as the letter of the 2012 Planning Rule.

Thank you.

*Susan W. Newell
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