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Review and Management Team

Custer Gallatin National Forest

May 30, 2019

Dear Reviewers and Managers-

I write to comment on the Draft Management Plan and Environmental Impact Statement (DEIS) that is currently available for the Custer Gallatin National Forest (CGNF).

I am a native of northern Wyoming, who has been living in Billings, Montana for the past 17 years. I have spent time in the Pryor Mountains and the Chalk Buttes, as well as many other mountainous areas of the United States. I have been in the Appalachians, the Rocky Mountains of Wyoming, Colorado and New Mexico, the Sierras, the Blue Mountains and the Cascades of the Pacific Northwest. As much as I appreciate all of those places, I find unique wonders in the Pryor Mountains and the Chalk Buttes.

The Pryor Mountains are full of rare surprise, especially in terms of biodiversity and landscapes and including areas with intact or nearly-intact wilderness character. I had the pleasure of helping with the Pryor Mountains Bio-Blitz, organized by faculty from Rocky Mountain College, a few years ago. And, even though I consider myself a "knowledgeable native of the area," I was blown away by what we found. To name one example, let me mention the variety of bees! Knowing the degree to which we depend on pollinators for human existence, I was overwhelmed to learn that in just a few days literally dozens of species of bees could be identified in the Pryor Mountains. The great diversity of important and rare species found in the Pryor Mountains is documented elsewhere and noted in your draft plan: "The Pryor Mountains contains a unique and diverse assemblage of botanical resources." So, let me simply say that perhaps only for the sake of this biodiversity, we should immediately put into place very strong safeguards that will minimize human impacts to this singularly complex and rare contingent of ecosystems.

Also, from the high Pryor Mountains plateau-unequaled anywhere else-to the amazing Big Bear and Lost Water Canyons, this landscape is largely unspoiled. It provides a wealth of untrammelled opportunities-albeit not as many as were available just a few years ago. Both purposeful and unintentional unauthorized activities have begun to degrade the landscape. I am concerned that the proposed "Backcountry Area" designations will not curb destructive activities. If implemented as a management plan, the "Backcountry Area" designation, which is fraught with ambiguity, will simply open the door to exploitation and excessive loss of wilderness character.

I write in opposition to the "Backcountry Area" designation and refer you back to a key designation that is available and understood with clarity: Recommended Wilderness Areas, as a preferred option. While it is clear that the entirety of CGNF lands the Pryor Mountains cannot be designated as Wilderness, I support designating the following Wilderness Areas: Punch Bowl RWAs, Bear Canyon RWA, and Big Pryor Mountain RWA. I also support the enlargement of Lost Water Canyon RWA. It is reasonable to put these areas under Wilderness Area designation. These areas are well deserving of this protection, and the current motorized and bike routes would not be impacted. Furthermore, and for the reasons noted above, I support Alternative D which specifically calls for:

Punch Bowl RWAs, 7,766 acres

Bear Canyon RWA, 10,366 acres
Big Pryor Mountain RWA, 12,737 acres and
Lost Water Canyon RWA, 12,992 acres.

Lastly, I note the Chalk Buttes as worthy of protection as a unique public and cultural resource in southeastern Montana. I grew up on a ranch near the Pumpkin Buttes of Campbell County, Wyoming. As kids, my siblings, cousins, neighbors and I were all over those buttes. We loved them for their wildness and their amazing vistas. We understood their importance to the American Indians, and we were taught to respect the buttes as a cultural landscape. The first time I visited the Chalk Buttes, I was overtaken by nostalgia. My heart ached for those days of my childhood spend on the Pumpkin Buttes, and I experienced deep pangs of regret. The Pumpkin Buttes have long-since been "occupied" by roads, cell towers and restricted access.

Please consider the uniqueness of the Chalk Buttes and manage them for their wilderness character, lest we lose another rare landscape of the plains-one that causes us to imagine the past while seemingly seeing into forever. The impressions of human activities are within view, but they take their rightful place: at bay, allowing the buttes themselves to speak to one's heart and soul. The Chalk Buttes remind us that it is important to find quietude, a vista for reflection, and a cool breeze to refresh our spirit on a hot summer day.

If you have any questions concerning my comments, please contact me directly.

Sincerely,
Susan Gilbertz
Billings, MT