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Comments:

My main comments pertain to the Pryor Mountains, however, I have also conducted research with students in the Ashland District, hunted in the Crazy Mountains and Absarokee Beartooth Wilderness for elk and carried out carnivore surveys with camera traps in the Absarokee Beartooth Wilderness.

These areas should all have Wilderness designations retained or increased for similar reasons as the Pryor Mountains. In particular the Absarokee Beartooth's should increase Wilderness designations in the Dome Mountain, Emigrant Peak, Chico Peak, Woodbine, East Rosebud to Stillwater and Red Lodge Creek areas. In the Ashland district the Tongue River Breaks, King Mountain and Cook Mountain should be managed as recommended wilderness. Backcountry use areas are not suitable alternatives for any of these public lands. The Pryor Mountains deserve increased habitat protection with an ecosystem approach. The concept of a balanced management approach which ensures opportunities for multiple forms of recreation is a goal that will not ensure the retention of biodiversity or ecological integrity, unless the plan includes Wilderness designated areas. Faculty at Rocky Mountain College have immersed students in the Pryor Mountains for many years, studying plants, wildlife and geology. This area is not just ecologically valuable but has importance as a place for students and the greater public for place-based learning and immersion in wilderness. Wilderness designation has incredible importance for protecting ever shrinking soundscapes of solitude, providing rare learning opportunities for students and the public and protecting rare plant and animal communities.

In 2012 Rocky Mountain College's Environmental Science program worked closely with the USFS, BLM, The Pryor's Coalition and the Eastern Wildlands Chapter of the Montana Wilderness Association to conduct a BioBlitz in the Pryor Mountains. This was truly a collaborative effort which highlighted the value the community places on the natural resources in the Pryor Mountains. With many members of the community working as citizen scientists and professional biologists we documented 812 species of plants and animals in just 24 hours in a section of the Pryor Mountains near Crooked Creek.

The diversity recorded during this survey highlight many of the unique species that inhabit the Pryor Mountains. Due to the range of elevation and moisture regimes there are many different habitat types, and thus one can find both plant and animal species found nowhere else in Montana. For example, the Pryor Mountains have the highest diversity of bats anywhere in Montana, house 40% of all plant species, and some rare birds can be found if one knows where to look. In addition, there are bighorn sheep, elk, a good population of black bear, genetically important cutthroat trout, and incredible spring wildflowers and butterflies.

Wilderness Areas provide important escape terrain for species such as elk, bighorn sheep, mule deer and American black bear. Providing wildlife with areas of escape terrain is critical in any management plan.

Numerous studies have cited the impacts of motorized recreation on wildlife and the importance of providing areas where animals can feel secure. Each year we learn more about the science of sound and the negative effects this can have on wildlife and humans. Wilderness Areas may be the only areas that can provide unique soundscapes to carry out some of these studies and thus are incredibly valuable, not just by providing quiet areas in an increasingly loud world, but also allowing further research.

The unique designations of the Pryor Mountains recognize the ecological value as an Important Plant Area, a Wild and Scenic River, Wilderness Study Areas, Important Bird Area and proposed Wilderness Areas. These designations highlight the importance of areas less accessible to humans on roads. Managing for roadless areas is important on any landscape as these areas help retain important ecosystem functions, retain water quality, reduce the likelihood of invasive weed establishment, and can serve as critical cover and escape terrain for wildlife species. They also provide important refuges (or stepping stones) in greater landscape linkages for habitat connectivity. The Pryor Mountains may possibly serve as an important corridor for species in the Absarokee Beartooth Mountains to connect with the Bighorn Mountains.

The four recommended Wilderness Areas in Alternative D (Lost Water, Big Pryor, Punch Bowl and Bear Canyon) should all be designated and managed to allow only foot and horse travel. It is critical to have areas like this in the Pryor Mountains to retain ecological services and as an alternative to the majority of the Pryor Mountains which already allow motorized vehicles and bike routes. The unique characteristics and designations listed above are reason enough to ensure future protection and select Alternative D.

These Wilderness Areas have been and should continue to be used as study sites in the future to monitor species in relatively untouched areas and assess the impacts of human activities on the landscape. There is important value to Wilderness Area designation, especially in providing a way to assess impacts of current and future management plans. Without these areas it will be difficult for the USFS or other researchers to assess the outcomes of any proposed plan. Any approved plan should at the very least include different landscape management designations to allow comparative studies to occur providing for the opportunity of adaptive management options in the future.

Finally, Wilderness Area designation is nationally recognized, and there is no need for new designations such as Backcountry Areas (one of the proposed alternatives in the DEIS). The only suitable Alternative is option D with