

Custer Gallatin National Forest
Attn: Forest Plan Revision
Custer Gallatin National Forest
10 E. Babcock, P.O. Box 130
Bozeman, MT 59771

Virginia Kelly, Forest Plan Revision Team Leader et al.,

RE : Custer Gallatin Forest Plan

Dear Planning Team,

6-5-2019

First, we would like to compliment the quality and innovative approach that was done to gather public comments for your new Custer Gallatin management plan, job well done!

Second, Our Montana supports the comments submitted by the Pryors Coalition for the Pryor Mountains. The Coalition has stated strong rationale for choosing alternative D. We might add that the Pryors have excellent habitat for the restoration and support of hunt able populations of elk. We suggest that a desired future condition, therefore, is hunt able populations of elk in the Pryor Mountains. The Punch Bowl RWA, according to Montana Fish Wildlife and Parks, was historic calving area for elk. Forest Road #2144 should be permanently closed in order to reestablish a secure calving area for elk. This would also provide better escape cover and walk in hunting at some future date. We believe that the Crow Tribe of Indians is of critical importance to the future management of the Pryors. A strong long term relationship between the Crow and the Forest Service is important for a broad range of issues particularly wildlife management.

Our Montana supports the consensus agreement that was developed by the Gallatin Forest Partnership. We ask that the new Forest Plan incorporate applicable elements of this agreement.

We recommend Alternative D for the Absaroka- Beartooth Mountains Geographic Area. There is much we like in the Alternative D proposal. The additions to the Absaroka-Beartooth Wilderness, the Recreation Emphasis areas are appropriate for long term management of the Custer Gallatin National Forest. Inventoried road less areas should remain Roadless and will help buffer wilderness additions. We also support the concept of Back Country Area for Chalk Buttes.

We disagree with the Forest Service's decision on Wild Horses in the Pryor Mountains and that the horse territory is beyond the scope of the Forest Plan revision. The Pryor Mountain horse herd is probably the most studied wild horse herd in the West. There are significant first person accounts as to where horses used habitat in the Pryors before the 1971 and at the time of passage of the Act. It is clear that although there has been some addition of horse genetics added to the horse population in the past, the horses in the Pryor have a strong component of the original Indian pony which dates back to the Spanish origins. Besides the beauty of the Pryor Mountains, viewing wild horses is one of the main attractions of recreationists in the Pryors.

There has been significant mortality to this horse herd in the past because of winter kill. The herd is also venerable to genetic inbreeding because of the small population. Small additions to the horse territory would add a measure of stability to this important natural resource. Adding Territory would have very little impact on the lesser priority of cattle grazing. It is important to note, the Pryor Mountain horse herd is carefully managed by the BLM. With a larger territory, ecological conditions can be maintained establishing stronger stability for this wild horse herd. A desired future condition should be stability and resilience of this wild horse herd. We encourage the U.S. Forest Service to cooperate with the BLM to secure this goal.

Mike Penfold

Field Program Leader - Our Montana, Inc.

Hard copy to follow.