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Thank you for the opportunity to comment on the Custer Gallatin National Forest Draft Forest Plan Revision. First, I would like to compliment the Custer Gallatin National Forest in presenting what I see as one of the first forest plan documents where the agency has started to look beyond their own jurisdictional boundary and try and see how their specific forest fits into the function of the greater, surrounding ecosystem. However, I think the Pryor Mountains Geographic Area missed out on much of this greater ecosystem recognition.

My comments on the Draft Forest Plan deal primarily with the Pryor Mountains Geographic Area. The Pryor Mountains are a very unique ecosystem, not only within the States of Montana and Wyoming, but also the entire Northern Rocky Mountain region. The ecological diversity found in the Pryors is some of the greatest encountered anywhere. The Pryors, from south to north, vary biotically from saltbush claylands, to the Utah juniper and curlleaf mountain mahogany shrublands, to the Douglas fir and limber pine woodlands, and finally to the subalpine meadowlands along the crest of the range. The biodiversity is tremendous for such a short span of distance. The Pryors are also a critical linkage in joining the nearby, relatively isolated Big Horn Mountains with the greater Rocky Mountain chain to the west. One of the few documented recordings of the fisher (*Martes pennanti*) in Wyoming came from the northern Big Horn Range. The Big Horn Mountains are also identified as "peripheral" Canada lynx (*Lynx canadensis*) habitat. The Pryor Mountains are the critical linkage for these two species, along with the wolverine, to exist in the Big Horn Mountains.

The Pryors also possess heritage resources that are unmatched by any other area in the region. The Pryors are part of the historic Apsáalooke homeland and are sacred to those people. Even though the Pryors are no longer within the boundary of a diminished Crow Reservation, the significance of the range to the Apsáalooke should be respected by people of all heritages; in both visitation and management. I would hope that U.S. Forest Service provides the Apsáalooke with cooperative government participation and input in all management aspects of the Pryor Mountains Geographic Area.

The following are my specific comments relating to the Draft Forest Plan:

1. I support the establishment of the Big Pryor and Bear Canyon Backcountry Areas. These lands have significant biological and cultural values and are pivotal in biologically linking the Big Horn Mountains to Greater Yellowstone. These areas also have the unfortunate history of experiencing considerable unauthorized vehicle use and abuse. Necessary resource protection is best served by backcountry or wilderness management. If the Backcountry management prescription is adopted, I hope the forest service provides the resources necessary to make certain acceptable use occurs. These areas would be excellent candidates for the forest service to partner with private citizens for public service projects on occasions such as Public Lands Day.

2. I support recommended wilderness designation for the entire Lost Water Roadless Area. Potential wilderness within the whole Pryor Mountains complex spans two federal departments, three federal agencies, and two states. In order for a holistic wilderness to ever become established in the Pryor Mountains, these individual agencies will need to look beyond their own boundaries to see how their wilderness quality lands mesh with those of the other, adjacent agencies. Currently there are five separate areas, managed by three separate agencies, within the Pryor Mountains complex that are recommended for wilderness designation. These individual areas are separated by two primitive "spaghetti strap" roads. In order to avoid management boundary nightmares and maximize ecological function of the wildlands, I recommend the forest service look at additional lands to be recommended for wilderness in order to meld with the lands recommended for wilderness by adjacent land managers. Specific items include:

\* Expansion of the Lost Water recommended for wilderness lands to include all roadless lands. This expansion would primarily focus on including those lands within the Burnt Timber watershed into a single Lost

Water Canyon recommended for wilderness unit. Expansion of the recommended wilderness into the Burnt Timber watershed will logically tie forest service wildlands to the BLM's Burnt Timber Canyon WSA and adjacent lands with wilderness characteristics (9,500 acres) to the south.

\* Expansion of the eastern boundary of the Lost Water recommended for wilderness area to the western rim of Cave Creek Canyon. The movement of this boundary slightly to the west would better protect the Cave Creek watershed and be offer better management for a possible Cave Creek Wild River corridor.

\* Big Coulee forest lands east of the Burnt Timber Road, FS 2849. When I examined the "Pryor Mountain Wilderness Inventory Map" it became fairly obvious that the forest service did not recognize that this parcel of roadless land (approximately 1,000 acres) was adjacent to the BLM's recommended Pryor Mountains Wilderness (approximately 20,500 acres of wilderness study area and adjacent lands with wilderness characteristics). I would like to see these forest service lands recommended for wilderness (Alternative D suggests these lands do meet wilderness criteria). The absence of wilderness designation for this parcel in a comprehensive interagency Pryor Mountains wilderness area would represent a substantial fragmentation of Pryor Mountains wildlands.

\* Additional roadless lands in and adjacent to Crooked Creek Canyon. Again, I recommend the forest service review the northern boundary of the BLM's adjacent and recommended Burnt Timber Canyon wilderness lands and match the Lost Water area's eastern boundary to those as much as possible. Crooked Creek Canyon is a rough, wild and beautiful feature. Maximum wilderness designation for the canyon, to its western rim, is recommended for a variety of resource protection reasons (water quality, fisheries, bats, cultural resources, cave resources, etc.). This would also benefit in the management of a possible Crooked Creek Wild/Scenic River corridor.

\* I would also recommend more protection for lands located on Commissary, Island, and Cave Ridges. These areas have naturally recovered quite well from past logging operations and now offer relatively easy backcountry access for hikers and walk-in hunters visiting the Big Ice Cave area. I recommend that the land on these ridges be managed as a Backcountry area. Such a management prescription would benefit wilderness and wild/scenic river resources on adjacent lands while providing convenient nonmotorized recreational opportunities for visitors of all ages and physical abilities.

\* Recommended wilderness for the Punch Bowl watershed. Again, these roadless lands are adjacent to the BLM's Bighorn Tack-on WSA that was recommended for wilderness (6,500 acres of WSA and lands with wilderness characteristics) and the National Park Service's 7,500-acre recommendation for wilderness within Bighorn Canyon National Recreation Area. A comprehensive wilderness unit at this location would provide resource protection for the entire north and east faces of East Pryor Mountain and establish a biological linkage zone with Crow Nation lands to the north. The remainder of the Punch Bowl lands (Dry Head Creek watershed) should retain a Backcountry management prescription.

3. I fully support the wild/scenic river eligibility determinations for Bear Creek, Crooked Creek, Cave Creek, and Lost Water Creek. I do have some questions about the categories determined for various segments.

\* Cave Creek. Table E-9 reports a single outstanding remarkable value of Geology for this segment. Beauty is in the eye of the beholder. I have in the past participated in ORV evaluations for waterbodies on National Park Service lands in Alaska and I would certainly say that the scenic qualities of Cave Creek and Cave Canyon would qualify scenery as an outstanding remarkable value. I feel many of the scenery values listed in this document for Crooked and Lost Water Creeks also apply to Cave Creek. Also, this table reports the location of Cave Creek as being Stillwater County.

\* Crooked Creek. The forest service gives this segment a tentative classification of "scenic." The BLM evaluation for the segment of Crooked Creek immediate downstream of the forest is "wild." The Crooked Creek Road is relatively close to the creek's right bank in a number of areas, however the ruggedness of the canyon provides a very substantial barrier between the road and creek. I recommend Crooked Creek be classified as "wild" from the forest boundary upstream to Wyoming Gulch and then retain the "scenic" classification to its headwaters.

4. Finally, I recommend the forest service consider a year-round open fire ban on forest lands in the Pryor Mountains. The exceptions for this would be in the developed Sage Creek Campground and Big Ice Cave Picnic Area. Such a ban would be similar to what is seen in the entire South Dakota portion of the Black Hills National Forest. An open fire ban would greatly reduce the chance of man-caused wildfire in the mountains. An open fire ban also tends to reduce the amount of dispersed camping in an area. One only has to go to the neighboring Bighorn National Forest to witness the tremendous negative impact that uncontrolled dispersed camping has had on the forest. With the proximity of a major urban area to the Pryor Mountains, dispersed camping is going to become a bigger and bigger management issue with the potential to quickly spiral out of management control (as I believe it has in the Big Horns).

Thank you for the opportunity to comment. I hope the Custer Gallatin National Forest fully realizes the ecological, scenic, and cultural significance of the entire Pryor Mountains complex and modifies the Draft Forest Plan to reflect a more holistic management approach for the area.

Jack Smith