To: Custer Gallatin National Forest

Objections to 2020 Land Management Plan for the Custer Gallatin National Forest

Specifically, to proposals for the Pryor Mountains of Montana

From: Great Old Broads for Wilderness, Bozeman Broadband

In the draft revision of the Custer Gallatin National Forest Plan, we signed on to work done in the Pryor Mountains by the Pryor Mountain Coalition, advocating for Alternative D acreages of recommended Wilderness.

In an analysis submitted to the Forest Service, Dick Walton of the Pryors Coalition et al, (comments dated 6/2/2019) outlined many problems and inaccuracies in the Draft Environmental Impact Statement. Great Old Broads for Wilderness strongly supports the comment details carefully identified therein. The errors in trail numbers and types identified in comments were not acknowledged or corrected for the Final EIS, indicating a lack of careful attention to the landscape and its management.

As comments point out, the Pryor Mountains contain a unique and diverse assemblage of botanical resources and plant associations within a relatively small area which are important for scientific study and education. Because of a unique convergence of three floristic provinces (Northern Great Basin, Middle Rocky Mountains, and Northern Great Plains), the Pryor Mountains are considered a botanical hotspot, rich in species and community diversity with more than 400 plant species, many of them rare. The 2012 Planning Rule directs that new and revised Forest Plans maintain or restore the integrity and diversity of ecosystems and habitat types in the plan area. While we are pleased that the CGNF has recognized part of the landscape as worthy of wilderness recommendation, other areas including the Punch Bowl and Big Pryor are just as important.

As leaders of Great Old Broads for Wilderness, Bozeman Broadband, we object to the proposal of Alternative F, and prefer recommended Wilderness acreages consistent with the Plan Alternative D offered. We concur with and support Objections A, B, C and D as documented in the objections submitted by the Pryors Coalition.

Sincerely,

Nancy Ostlie and Linda Healow

Co-leaders, Great Old Broads for Wilderness, Bozeman Broadband