

September 6, 2020

USDA Forest Service
Objection Reviewing Officer
Northern Region
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Missoula, MT 59804

A lot of work by both Custer Gallatin National Forest staff and the public went into developing the 2020 CGNF draft Land Management Plan and Environmental Impact Statement. We appreciate CGNF's recognition of the very special values of the Bear Canyon watershed in the Pryor Mountains, and the designation of the area as Recommended Wilderness. This is a very good step in the right direction. But we are disappointed that the draft 2020 Land Management Plan does not provide merited Wilderness protection for more areas of the Pryor Mountains. The Pryors landscape and ecosystems are of types that are greatly underrepresented (or *not* represented) in the National Wilderness Preservation System.

After studying the Plan and EIS the Pryors Coalition finds many things we approve, but there are some changes and improvements we would like to see to better preserve the unique Pryor Mountain landscape. Our formal "Objections" to the draft 2020 Custer Gallatin Land Management Plan and EIS are attached before.

Thank you for carefully considering our objections.

Sincerely,

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Custer Gallatin Land Management Plan Revision Objection Template

Objection A:

Statement of issues and/or parts of the plan revision to which the objection applies:

Another standard is needed in the Pryors (PR-STD-PBCA)

- **The reasons for this objection are:**

Forest Supervisor Mary Erickson wrote in the Draft Record of Decision (page 13):

“I have selected a backcountry allocation for Big Pryor (12,610 acres) and Punch Bowl (6,097 acres) so that existing ... mechanized transport can continue but not expand....”
(Underline emphasis added.)

There is nothing in the draft 2020 Land Management Plan (either in the forestwide direction, page 125, or in the Pryor Mountain Geographic Area plan components, page 148) that precludes expanding mechanized transport in these two BCAs.

- **Proposed Solution:**

To implement Forest Supervisor Erickson’s decision, stated in the ROD, that mechanized use would not be expanded in the Pryor Mountain BCAs, another standard is needed under (PR-STD-PBCA):

03 New mechanized trails shall not be constructed or designated.

Statement demonstrating the link between objection and prior formal comments:

All the Pryors Coalition’s previous comment letters have requested that the Punch Bowl, and Big Pryor areas be designated as Recommended Wilderness and thus not be suitable for any mechanized (mountain bike) use. Obviously this also implies expansion of mechanized use should not be permitted.

Objection B:

Statement of issues and/or parts of the plan revision to which the objection applies:

The Land Management Plan and FEIS erroneously assert that Big Pryor Trail #30 is a designated system trail.

- **The reasons for this objection are:**

The January 2018 Proposed Action, the March 2019 DEIS, and the July 2020 FEIS all explicitly or implicitly assert that “Big Pryor Trail #30, [is] a non-motorized system trail open to mechanized use.”¹ “In alternative D, ... mechanized recreation uses would no longer be suitable on ... 5.7 miles of mechanized trail.”² This 5.7 miles includes both the 1.6 mile Trail #31, and, erroneously, the 4.1 mile Trail #30.

¹ 2018 Proposed Action, Appendix D, page 45.

² Big Pryor Wilderness Analysis: 2019 DEIS, page 171; and 2020 FEIS, page 207.

In previous comment letters³ we have pointed out that *this* “Big Pryor Trail #30” is *not* a designated system trail.⁴ It appears nowhere in the 2008 Travel Management Plan or related documents. *This* trail #30 is not mentioned in any table, map or text in the 2008 TMP. There have been no amendments to the 2008 Travel Management Plan. Motor-free trails are not included in the previous (1987) Travel Plan.

Although there was a historic horse trail from the Sage Creek Ranger Cabin to the Big Pryor Plateau, it’s route was “lost” for many years. A couple years ago the trail was reportedly “found” again, and has been reconstructed. But this new trail deviates substantially from the historic route. CGNF violated the law by designating this long lost trail as a “system” trail, and constructing a new trail without first complying with NEPA, the NHPA, and NFMA (including the agency’s own travel rule).

Designation of a new system trail is not appropriate in the Management Plan. This site-specific action should be in a Travel Plan. But CGNF has made it a Management Plan issue by asserting, for the first time in the Management Planning process, that Trail #30 is a system trail. This trail played a significant role in the Supervisor’s decision to designate Big Pryor as a BCA rather than an RWA. (See objection C below.)

- **Proposed Solution:**

All explicit and implicit reference to “Big Pryor Trail #30” should be removed from the draft Plan and FEIS. “The trail must be carefully evaluated and analyzed as required by law (NEPA, NHPA, NFMA and the travel rule) including public input, before being designated a system trail (or not), and before a decision regarding permitted uses (mechanized or not).” (Mountain bikes did not exist when this historic horse trail was previously used.)

Statement demonstrating the link between objection and prior formal comments:

In previous comment letters⁵ we have pointed out that “Big Pryor Trail #30” is *not* a designated system trail. CGNF has failed to respond to our previous comments.

Objection C:

Statement of issues and/or parts of the plan revision to which the objection applies:

The decision not to designate Big Pryor and Punch Bowl areas as Recommended Wilderness was based on inaccurate information and therefore is flawed.

- **The reasons for this objection are:**

Forest Supervisor Mary Erickson wrote in the draft Record of Decision (page 13):

³ Pryors Coalition comment letter on the Proposed Action, February 28, 2018, page 9, and Pryors Coalition comment letter on the DEIS, June 1 2019, page 5.

⁴ Confusing the issue, the Crater Ice Cave Trail #31 is erroneously called “Trail #30” throughout the 2008 Travel Plan documents.

⁵ Pryors Coalition comment letter on the Proposed Action, February 28, 2018, page 9, and Pryors Coalition comment letter on the DEIS, June 1 2019, page 5.

“The Pryors Coalition requested that Big Pryor and Punch Bowl also be recommended wilderness areas... I have selected a backcountry allocation for Big Pryor (12,610 acres) and Punch Bowl (6,097 acres) so that existing motorized and mechanized transport can continue but not expand, and to retain flexibility for future vegetation management.”
(Underline emphasis added.)

Mechanized and Motorized Transport

a. Punch Bowl:

There are no mechanized or motorized routes within the 6,097 acre Punch Bowl BCA, so there is no existing mechanized or motorized transport to continue.

b. Big Pryor:

The only mechanized system route within the 12,610 acre Big Pryor BCA is the 1.6 mile Trail #31 from Tie Flat to Crater Ice Cave. (See discussion of “Trail 30” above.) Trail #31 is on the edge of the Big Pryor BCA and could be easily excluded by shaving about 200 acres from the 12,610 acre BCA. (We propose a better choice would be to designate that short trail for non-mechanized use only. It doesn’t seem attractive for mountain biking. Do mountain bikers use the trail?)

There is a single 3.6 mile motorized route in Big Pryor BCA. It, or part of it, could be cherry-stemmed for light use by the grazing allottee. Motorized recreationists rarely use this dead-end route to nowhere.⁶

If the Punch Bowl and Big Pryor areas are designated as Recommended Wilderness, existing motorized transport will continue on 97% of the CGNF authorized motorized routes in the Pryors.

Future Vegetation Management:

Forestwide direction in the 2020 Plan for Recommended Wilderness Areas includes:

“Suitability (FW-SUIT-RWA)

03 Recommended wilderness areas are suitable for low impact restoration activities that move toward desired conditions (such as prescribed fires, active weed management, planting) and that protect and enhance the wilderness characteristics of these areas.”

(Underline emphasis added.)

So it seems unnecessary to designate the areas as BCA instead of RWA for vague “future vegetation management.”

Wilderness Analysis – DEIS and FEIS:

In previous comments⁷ we identified some problems with the DEIS Wilderness Area Analysis for the Big Pryor area. These problems include missing, misleading and inaccurate information.

⁶ Pryors Coalition comment letter on the DEIS, June 1 2019, page 9.

⁷ The Pryors Coalition’s June 1, 2019 comment letter on the Draft Revised Forest Plan and Draft Environmental Impact Statement, pages 2-5.

CGNF has not responded to our comments. The FEIS Wilderness Area Analysis is almost unchanged from the DEIS with no corrections.

- **Proposed Solution:**

Each of the Big Pryor and Punch Bowl BCA vs. RWA decisions should be reconsidered in the light of the above facts which were apparently not considered in the decision as reported and explained in the draft Record of Decision.

Statement demonstrating the link between objection and prior formal comments:

As the Forest Supervisor acknowledged in the ROD, The Pryors Coalition has requested RWA designation for these areas in previous comments. Our previous comments also pointed out that “Trail #30” is not an authorized mechanized trail. (See Objection B above.) Some new issues, discussed in “The reasons for this objection” above arise from the newly released Plan and the Supervisor’s stated explanation for her decision.

Objection D:

Statement of issues and/or parts of the plan revision to which the objection applies:

There are numerous inaccuracies in the map: **“Custer Gallatin National Forest Plan Revision Alternative F, Designated Areas and Land Allocations, Pryor Mountains Geographic Area.”**

- **The reasons for this objection are:**

We were surprised to see that this new map produced for the 2020 Revised Land Management Plan and FEIS includes numerous inaccuracies – even after several years of intense work by CGNF on the Plan revision. CGNF has been using the same flawed “base map” for more than a decade on nearly all Pryor Mountain maps produced for the public.

The trail from Tie Flat to Crater Ice Cave is still erroneously labeled “30” instead of “31.” This is significant because of the confusion about the “new” Trail 30. (See above.)

Numerous two-track routes are shown on this map that have not been authorized system routes since the 2008 Travel Plan. Some of these never were authorized system routes. In about 2004, Custer National Forest assigned a staff member the task of surveying, with a GPS equipped ATV, all the user created scars on the ground. As part of the systematic survey all of these were assigned ID numbers and mapped. That did not make them authorized system routes. Yet they “live” forever on all CGNF maps. It is past time to clean this up.

Examples of these unauthorized routes shown on the new 2020 map include:

- a. All the routes shown within the Bear Canyon RWA from the BLM boundary to the top of Red Pryor Mountain. By quick estimate this is about 6 miles of unauthorized routes.
- b. The approximately 2 mile segment labeled “#2088 northwest then west from Crater Ice Cave to an intersection with #2095.
- c. Cave Ridge route labeled #2094

- d. Piney Creek route labeled #2012
- e. A number of short spurs. Compare with the 2008 TMP, or the Pryors MVUM to identify them.

Showing these unauthorized routes on all maps distributed to the public, especially the new 2020 Management Plan map, is a disservice to the public and to the fragile landscape. It confuses the public, and encourages some “bad apples” to check the routes out. We have occasionally seen 4-wheelers or their tracks on some of these routes.

- **Proposed Solution:**

All these inaccuracies should be removed from the 2020 Revised Land Management Plan maps, and from all future CGNF maps of the Pryors.

Statement demonstrating the link between objection and prior formal comments:

Although we have occasionally objected to this careless mapping over the years⁸, we did not anticipate that a new map for the new Management Plan would have the same old inaccuracies. So this is a “new” issue that arose with the July 2020 release of the Revised Forest Plan and FEIS.

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⁸ For example in a February 8, 2012 meeting between half-a-dozen of us, and the Forest Supervisor, Deputy Supervisor, Beartooth District Ranger, Recreation Program Manager, and Roads and Travel Management Administrator.