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Objection Reviewing Officer  
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After four years of hard work the revised Custer Gallatin National Forest Management Plan is nearing completion. We have spent considerable time on CGNF lands, and have submitted comments during many stages of the Forest Management Plan revision process. Our focus in the planning process has been primarily on the Pryor Mountains. We are delighted with the designation of the Bear Canyon Recommended Wilderness. This area certainly merits such recognition and preservation for the future.

However we believe CGNF can, and should, significantly improve the draft 2020 Land Management Plan and FEIS. Our Objections, below, again focus on the Pryors, but a larger context needs to be considered. The Pryors, although an “island range,” are an important and unique piece of the CGNF, Montana, and national landscape.

It is appropriate that the Forest Supervisor has considerable discretion in making decisions on land designations and management policies. But that authority comes with great responsibility: responsibilities to the landscape, to the natural ecosystems, and to the future.

In the 1986 Custer National Forest Management Plan the Pryors were lumped with the very different (geologically, ecologically, floristically, culturally, socially), and *much* larger, North and South Dakota Grasslands and the Ashland District.<sup>1</sup> The resulting “plan” was not appropriate for the unique Pryors. Yet the Pryors management has been controlled by this direction for 34 years.

Now this Plan revision is an opportunity to re-envision the future of the Pryors. We have a responsibility to do so. This will be the *first* Pryors Management Plan designed *for the Pryors*.

The 1986 Plan for the Pryors reflected mid-twentieth century thinking for Dakota grasslands. The Forest Service decision makers (and all of us) should feel obligated to develop a CGNF Management Plan for the Pryors appropriate for the mid-twenty-first century and beyond.

Unfortunately we do not believe the recently released 2020 Land Management Plan and draft Record of Decision meet this objective. With some exceptions, notably designation of the Bear Canyon Recommended Wilderness, this Plan seems to be largely a status-quo management plan. “Status-quo management” is very different from “*keeping the Pryors the same as they are*.”<sup>2</sup>

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<sup>1</sup> Three-quarters of the CGNF Pryors (~60,000 acres) are in management areas B and D. But this is only 4% of the 1.5 million acres in these management areas – mostly in the Dakotas. Thus management direction for these areas was designed for the grassland and grazing land in the Dakotas – not for the Pryors. (See page 3 of the Pryors Coalition’s April 5, 2016 letter to CGNF providing input on the Assessment Phase of the planning process.)

<sup>2</sup> Management has been largely status-quo under the 1986 Management Plan for the last 34 years. (The 2008 Travel Plan may be an exception, but it was largely a status-quo Travel Plan.) People who have been going to the Pryors for thirty-four years know the Pryors now are not the same as they were in 1986.

Populations of surrounding counties will continue to increase. Public interest in the Pryors will probably continue to increase even faster. Recreational technology (motorized and non-motorized) will likely continue to develop. Under status-quo management the Pryors will not remain as they are.

Degradation of the unique Pryor Mountain landscapes and ecosystems will increase due to increasing public pressure. An example: Noxious weeds have become established in parts of the Pryors. They will continue to expand. Increasing public traffic on the many motorized routes will spread existing infestations and seed new infestations. Will the Beartooth District budget and staff continue to decline?

New management vision is needed. An example: More designated wilderness, with well established management policies, will better preserve the Pryors’ unique ecological characteristics (described on pages 139 & 140 of the Forest Management Plan) than “same-old” management will.

We believe people in 2050 will regret our lack of foresight in 2020.

Most of the Wilderness quality land in the Pryors is considered, pro forma, for Recommended Wilderness designation in Alternative D. However the decision (Alternative F) mostly maintains current management and land use strongly influenced by the 1986 Plan. Alternative D is in fact a moderate proposal.

The draft FEIS includes at least brief discussion of many important issues in the Pryors, but in the end the Revised Plan and Record of Decision seem to us to have several big-picture failings:

1. Wildlands are rare in the big picture. If CGNF wilderness quality lands are considered in isolation, it may seem reasonable to divide this “pie” - designating only a fraction as RWA, and other areas for less protective designations. But this wilderness quality land should be considered with a view of all of Montana, the western U.S. and beyond. Only a tiny fraction of Montana and the U.S. remains with Wilderness quality after more than a hundred years of continuous loss to development. From this perspective it is very reasonable to protect every bit that remains with RWA designation. Less protective designations and further fragmentation into smaller pieces is are roads to extinction.
2. Preserving natural landscapes and ecosystems is more important than recreation. The dominant thinking behind many Management Plan decisions seems to be that the primary public purpose for the land is recreation. A very important part of our lives has been outdoor recreation (hiking, backpacking, paddling, ski touring, bike riding, 4WD and more), but this is all secondary to the higher purpose of preserving the few remaining natural landscapes and ecosystems – the flora and fauna. There are many places for recreation.
3. The Pryors are special. There seems to be a perception that the Pryor Mountains are a “lesser” landscape - not up to the standard of “real” wild land generally considered for Wilderness designation. This thinking is completely backwards. The difference of the Pryors (and other eastern Montana landscapes) is precisely why preservation by Wilderness designation is critical. The Pryors landscape and ecosystems are of types that are *not* represented (or are greatly underrepresented) in the National Wilderness Preservation System.

The 2020 draft CGNF Revised Plan and EIS make some major improvements over the 1986 Plan. The structure and language is updated to conform to current rules, regulations and style. There is considerable acknowledgement of the special and unique characteristics of the Pryor Mountains that was absent in the 1986 Plan. But the 2020 draft Plan itself is largely a status quo plan. It mostly maintains the current management and uses within the updated language. It reverses the guidance in the 2012 Planning Rule that site-specific management is to be subservient to the Management Plan. For example Travel Plans are to be reconsidered in the light of the revised Management Plan and revised if necessary. Instead as indicated in the ROD and other public statements, Management Plan decisions were explicitly made to maintain existing Travel Plans and other site-specific management and uses. CGNF staff have described “Backcountry Areas” as status-quo designations.

The draft Record of Decision states that Big Pryor and Punch Bowl were not designated as Recommended Wilderness Areas (RWAs) “*so that existing motorized and mechanized transport can continue.*” This decision is based on inaccurate and exaggerated information. There are no authorized motorized or mechanized routes within the Punch Bowl “Backcountry Area.” The Big Pryor BCA includes only 1.6 mile of authorized mechanized trail, and a single 3.6 mile, dead end, motorized route which is little used by motorized recreationists.

There is already an overabundance of redundant motorized routes fragmenting the Pryors – more than CGNF can monitor and maintain (including weed control). If both the Punch Bowl and Big Pryor areas were designated RWAs instead of BCAs, 97% of the authorized motorized routes in the CGNF Pryors would remain open.

In the 1986 Plan the paltry 6,800 acre Lost Water Canyon RWA is the only Wilderness recommendation. Now we have the opportunity to add a Big Pryor Mountain (12,610 acres) and Punch Bowl (6,097 acres) Recommended Wilderness, along with the Bear Canyon RWA (10,366 acre) to the slightly enlarged Lost Water Canyon RWA (7,692 acre). This would make 36,755 acres of Recommended Wilderness in the CGNF Pryors – giving the highest level of protection to this special landscape. The “cost” is a mere 3% reduction in the abundant motorized opportunities. This seems like a great opportunity to establish a new vision for the Pryor Mountains for the twenty-first century!

A once every three decades Management Plan revision is an opportunity to re-envision the long range view of what the Pryors could be in 2050 and beyond. CGNF has failed to do this.

We strongly endorse the Objections submitted by the Pryors Coalition et al.

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