



# The Pryors Coalition

December 6, 2019

Dave Lefevre,  
Field Manager  
Billings Field Office  
Bureau of Land Management

The Pryors Coalition and partner organizations<sup>1</sup> appreciate the opportunity to comment on the Pryor Mountain Area Travel Management Plan and Environmental Assessment. The Pryors Coalition is a collaboration among a number of groups and many “unattached” individuals who may or may not be associated with those organizations. The defining characteristic of Pryors Coalition and partners (groups and individuals) is a strong desire to preserve this very special and vulnerable landscape for the future.

Having studied the TMP and EA, we commend the considerable advance planning regarding publication, education, signing, maintenance, monitoring, and enforcement of the Travel Management Plan (Appendix B, pages 9-20). We do worry whether the Billings Field Office will have sufficient staff time and funding to fully implement all these well intended plans – especially with ten other TMAs to manage.

We are very pleased that, for the first time, BLM proposes to designate motor-free routes in the Pryors where hikers and equestrians can explore this special area without the commotion and other impacts of motor vehicles. This proposal includes some great opportunities including: the Water Canyon, Pygmy Panther, Rocky Juniper, Big Sky, Demijohn Flat, and Sykes Arch Trails.

## **Mountain Bikes:**

We have a concern regarding these and other proposed motor-free trails. Apparently, by default, they will all be open to “cycling” (i.e. mountain bikes. (See EA, “Limited (Non-Motorized)” page 2-1). Specific signage for “Non-Mechanized Use Only” routes is described in the TMP (Appendix B, page 14), but there is no mention anywhere in the EA or TMP that any routes in the Pryors are to be designated as non-mechanized.

With 125 miles of open roads in the BLM Pryors (and another 124 miles in the FS) there is an abundance of opportunities for mountain biking on spectacular routes – including a diversity of fun and challenging routes. Some of us have biked some of these routes. Even with implementation of this TMP, designated trail opportunities for hikers and equestrians will be very limited in the Pryors. It is well known that there are use conflicts between hikers and equestrians, and mountain bikes due to bikes’ higher speeds and other differences. We appreciate BLM’s recognition of these conflict in a stated Desired Future Condition, and Goal of the TMP.<sup>2</sup>

In order to minimize conflicts and provide quality recreation opportunities for hikers and equestrians, the few non-motorized routes in the Pryors should be explicitly designated as non-mechanized.

There are additional reasons for non-mechanized designation of the non-motorized routes in the Pryors:

- Some of these routes are in WSAs or LWCs. Bikes should not be permitted, but apparently are not excluded by the TMP (Appendix B, page 3-25).
- Some of these routes (e.g. parts of Demijohn Flat, Sykes Arch, Rocky Juniper and others) will be primitive trails without a tread, and delineated by rock cairns. (EA page 2-6 and Appendix B, page 9). Wheeled vehicles are not appropriate on treadless routes.
- Some of these BLM motor-free routes provide access to the FS land where there are currently no designated routes (thus bikes are not permitted). Permitting bikes on short BLM segments leading to FS land where bikes are not permitted is an invitation to violations, and creates an enforcement impossibility. Even if FS route extensions are designated later, these FS routes may also be primitive routes without trail treads.

---

<sup>1</sup> Our Montana, Montana Wildlife Federation, Beartooth Back Country Horsemen, Gallatin Wildlife Association, Great Old Broads for Wilderness, Bozeman Broadband, Sierra Club.

<sup>2</sup> Appendix B, (underlines added). Desired Future Condition: “A wide variety of trail-based recreational opportunities (e.g. hiking, mountain biking, ... horseback riding) in a manner that reduces existing user conflicts” (page 7). Goal and Objective: “... all designations shall be based on ... minimization of conflicts among various uses of the public lands” (page 8).

- The growing popularity of e-bikes, and the recent Interior Secretary’s order 3376 permitting e-bikes on non-motorized routes, makes all the above arguments considerably more compelling. E-bikes are incompatible with the nature and objectives of these few routes – despite the Orwellian declaration that bikes with electric motors are non-motorized. (See “**NEPA Compliance**” section on page 4.)

Currently there is not a lot of mountain biking recreational use of the Pryors. It will be much easier to proactively make the initial designations of non-motorized routes also *non-mechanized*. Soon there may be increasing bike and e-bike recreation in the Pryors causing user conflicts and landscape impacts. It will be difficult to restrict bikes then.

### **Inadequacy of Non-Motorized Designations:**

There is a strong public desire for motor-free (and mechanized-free) trail opportunities in the Pryors. BLM identifies addressing non-motorized public recreation opportunities as a “*key issue*” (Table 1-1, EA page 1-5, #7). BLM’s stated “*indicator*” for this issue is: “*Total miles open to non-motorized use within the TMA (Ib.)*.”<sup>3</sup>

In the TMP BLM proposes designation of 125 miles<sup>4</sup> of open public motorized routes, 64 miles of administrative motorized routes, and 54 miles of non-motorized routes (Appendix B, page 3). We note that the “*indicator*” (total miles) for non-motorized use is considerably less than the indicator for motorized use.

However details of these **claimed 54.3 miles of non-motorized designations**<sup>5</sup> need consideration. Many of these miles are not desirable opportunities for quality motor-free recreation. Some seem to be “leftovers” after designation of motorized routes.

Table 3 in the TMA (Appendix B, page 3) lists 37.0 miles of “Routes Designated as Exclusively Non-motorized Trails” based on Appendix O of the 2015 RMP. The third item in the list is PM 1024 with a reported mileage of 22.8 miles. Is any road in the Pryors 23 miles long?! PM 1024<sup>6</sup> is just west of Crooked Creek Road and Demijohn Flat. On the Proposed Action map this route appears to be about 1 mile long. Perhaps the 22.8 is simply a drastic typo. Another possibility is that the nearby maze of old “road” scars from uranium prospecting were lumped with “PM 1024” to avoid listing each segment separately. A hoard of these scars seem to be indicated as non-motorized routes by a mess of brown dots on the Proposed Action map. We can think of no rational reason to designate 23 miles of these tangled scars as non-motorized routes. In our December 3, 2018 letter to BLM<sup>7</sup> we suggested an approximately 5 mile “Zigzag Trail” hiking loop in this area. This loop is on the map, but with about 1 mile designated open for motorized use. Thus, of the BLM claimed 22.8 miles, about  $23 - 4 =$  **19 miles are not desirable opportunities for quality motor-free recreation.**

The Proposed Action map shows “Bear Canyon Road” south from Helt Road to highway 310 as a designated non-motorized trail. From the map we estimate this route to be about 4.5 miles long – not counting the nearly 1 mile across private property in the middle. We believe almost no one will consider this to be an interesting non-motorized trail. Most people would not consider it to be “in the Pryors.” These **4.5 miles are not a desirable opportunity for quality motor-free recreation.**

The Proposed Action map shows, as designated non-motorized, three route segments just north of and parallel to Helt Road. These routes connect Graham Trail, Stockman Trail, Bear Canyon Road, and Horse Haven Road. The easternmost segment between Bear Canyon and Horse Haven is useful to hikers and equestrians. It connects the Bear Canyon to the Rocky Juniper or Big Sky Trails for loop hikes providing a motor-free route

<sup>3</sup> This indicator, as worded, is not useful since all routes (open motorized, administrative motorized, and closed) are “*open to non-motorized use*” (Appendix B, page 3). Regardless of the TMP designations the indicator would be the total of all routes – even if no routes were designated non-motorized. We suspect (and hope) that BLM means the indicator is “Total miles designated non-motorized in the TMA.” Note: Closed routes “*will not be signed and will not be included on maps provided to the public*” (EA page A-2), and in many (most?) cases administrative routes may be uninteresting for motor-free recreation.

<sup>4</sup> This includes county roads and highways. There are 112 miles of open BLM routes.

<sup>5</sup> Unfortunately the EA does not include an explicit list (with names, route numbers and mileages), or a good map, showing the 54 miles of proposed motor-free routes with route numbers or names. Table 3 in the TMA (Appendix B, page 3), the text above it, “*additional non-motorized routes are specified in this TMP.*” and the Proposed Action map are inadequate. BLM was unable to provide us a comprehensive and correlated list and map before the comment deadline. The imminent comment deadline (and Thanksgiving) did not permit a meeting with BLM staff that might have clarified some issues. Regardless our written comments must address what is, and is not, in the EA and TMP as published.

<sup>6</sup> Since the number PM1024 is not on the Proposed Action map, we found this on a map titled “Pryor Mountain - Travel Management Area Billings Field Office” in the 2015 Proposed Final RMP.

<sup>7</sup> That letter is incorporated by reference in this comment letter.

back to their starting point. But the western two segments (From Graham Trail to Bear Canyon) have no value to hikers or equestrians. They don't connect to any other motor-free routes and have no particular interest on their own. These **2.5 miles are not a desirable opportunity for quality motor-free recreation.**

Subtracting these routes, and others (see footnote<sup>8</sup>), from the 54 miles reported in the TMP, we find that the **TMP proposes only about 25 or 26 miles of desirable routes for quality motor-free recreation.**

The conclusion is that the 54.3 mile "indicator" for Travel Management designated non-motorized opportunities is inflated by a factor of approximately two. The 25 miles of designated non-motorized routes is certainly an improvement compared to the current zero, but is quite paltry compared to 125 miles of designated open motorized routes.

The 125 miles of BLM designated motorized routes open to the public (particularly when combined with another 124 miles on Forest Service land) provide a comprehensive network of motorized recreational opportunities. Many would consider it excessive. There is no similar network of designated, mapped, signed, and publicized routes for motor-free recreationists. It is difficult to avoid thinking that all routes were first considered for motorized use – unless some very strong contrary reason could be found. The need for motor-free routes was apparently not considered as a valid reason on its own. The few leftover routes were then considered for non-motorized designation. As stated in our December 3, 2018 letter to BLM, given the long history of unrestrained user created motorized routes in the Pryors, it is not possible to designate a satisfactory system of motor-free routes without converting a few of the redundant motorized routes to non-motorized trails.

Our December 3, 2018 letter suggested possibilities for appropriate conversion. One, that does not require cooperation with the Forest Service, is PM1132 in the northwest corner of BLM.<sup>9</sup> Currently PM1132 is open to public motorized use. Converting the approximately 2+ mile and redundant PM1132 from motorized to non-motorized designation, and designating the currently closed<sup>10</sup> PM1134 as non-motorized, would create 4+ mile hiking loop accessible with highway vehicles. Instead BLM proposes to open PM1134 to public motorized use. *Note:* PM1134 does not quite connect to PM1132 due to the topography. They do **not** make a motorized loop. PM1134 is a rather pointless dead end route for motor vehicles. But it could make a non-motorized loop with PM1132.

We suggested other opportunities to convert redundant motorized routes for motor-free use that would require BLM/FS cooperation. This has apparently not happened. The timing always seems to be wrong. Each agency defaults by maintaining motorized routes to be consistent with the other. A few years later the other agency defaults to the first for the same reason. If this cycle, always defaulting to motorized use continues, it is unlikely there will ever be a satisfactory system of motor-free routes designated in the Pryors.

### **FLPMA "Multiple Uses":**

The Pryor Mountain Travel Management Plan fails to manage for "multiple uses," particularly for wildlife and bird habitat, wilderness values, and non-motorized or quiet recreational activities.<sup>11</sup> BLM must adequately provide for

---

<sup>8</sup> Other "non-motorized" routes shown on the Proposed Action map are also of questionable value – redundant, uninteresting, isolated fragments, and/or inaccessible to hikers or equestrians without 4WD, including (with estimated mileage): 1) The parallel track east of Big Sky Trail (0.6) In the RMP process we understood this was to be dropped as redundant and disappearing. 2) The track just east of "ad" in "Horse Haven Road" (0.5). 3) The trail from Helt Road to Horse Haven Rd. and the Rocky Juniper Trail (0.6). It is questionable whether hikers would use this trail which is currently non-existent on the ground. 4) West of the administrative route west of Burnt Timber (0.9). 5) Others?

<sup>9</sup> These PM numbers are from the "Pryor Mountain – Travel Management Area" map in the 2015 RMP mentioned above.

<sup>10</sup> PM1134 is indicated as "Administrative use (closed to the public)" on the No Action Alternative map in this TMP and EA. It is shown as "closed" (not even administrative use) on the Alternative A (No Action) Map 143 in the RMP.

<sup>11</sup> Under the Federal Land Policy Management Act (FLPMA), managing for "multiple use" means providing and maintaining opportunities for a variety of uses. 43 U.S.C. § 1702(c). Thus, while some areas may be set aside for motorized use, other areas should be managed for other resources, including habitat, wilderness, and quiet recreation.

Pursuant to Executive Order ("E.O.") 11644, "Off-Road Vehicles on the Public Lands," as amended and strengthened by E.O. 11989 (1977), BLM is to "provide for administrative designation of the specific areas and trails on public lands on which the use of off-road vehicles may be permitted, and areas in which the use of off-road vehicles may not be permitted." E.O. 11644 also directs that the designation of areas and trails for motorized use on public lands be in accordance with the following:

- Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.
- Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.

balanced and multiple uses by providing for enough different lands, roads, areas, and trails for motorized and non-motorized use. Shared access to the same lands, roads, areas, and trails at the same time does not suffice.

BLM suggests that its Proposed Action provides a balanced mix of multiple uses<sup>12</sup>. But the Proposed Action does not satisfy this goal because it does not provide balanced opportunities for motor-free recreation comparable to opportunities for motorized recreation. (See “**Inadequacy of Non-Motorized Designations**” on page 2.) Furthermore the quality of the designated motor-free recreation routes will be substantially degraded by mechanized recreation (i.e. mountain bikes), and even more seriously threatened by motorized e-bikes. (See “**Mountain Bikes**” on page 1.)

### **NEPA Compliance:**

BLM fails to adequately assess the direct, indirect, and cumulative effects of the proposed action as required by NEPA.<sup>13</sup> The proposed action may have significant direct, indirect, and cumulative impacts, including those of mountain bikes and e-bikes: They will cause trail damage, displace wildlife, and compromise opportunities for solitude for equestrians and hikers. There is also the potential for mountain biking to impact the wilderness character of WSAs and LWCs (where mountain bikes are not excluded from WSAs or LWCs). (See “**Mountain Bikes**” on page 1.) The continuous ground contact of wheels (as opposed to feet), and sometimes sliding contact, increases impacts on trails. The higher speeds of bikes increase the length of trail, and surrounding habitat impacted. Increasing mountain bike use will increase cumulative effects.

The rapidly developing technology of e-bikes, their increasing popularity, and the Interior Secretary’s Order (SO 3766) permitting e-bikes on non-motorized trails, will result in “reasonably foreseeable” increasing impacts. Their impacts will be greater, and in addition to, the impacts of standard mountain bikes because: they are heavier, and faster (and will travel farther). Since they are less challenging physically to ride (than standard mountain bikes), more people will do so, and will ride farther.

NEPA analysis for designation of non-motorized trails must be very different post SO 3376 than pre SO 3376. The default should be non-mechanized designation. A default permitting mechanized use (and therefore e-bikes) on non-motorized trails will have serious environmental consequences. The analysis must consider the impacts of motorized bikes. Yet nowhere in the EA is it even acknowledged that e-bikes will be permitted on all non-motorized trails in the Pryors. Nowhere in the EA are the environmental impacts of these motorized bicycles considered and analyzed

- 
- Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands.

The directives in E.O. 11644, commonly referred to as the “minimization criteria,” require BLM to minimize motorized impacts on public lands. See *Wildlands CPR v. USFS*, 872 F.Supp.2d 1064, 2012 WL 1072351 at \*12-13 (D. Mont. 2012). “Minimization” does not mean that BLM must eliminate all impacts, but that BLM must designate routes and areas for motorized use to minimize damage to natural resources and conflicts between uses. *Idaho Conservation League v. Guzman*, 766 F.Supp. 2d 1056 (D. Idaho 2011) (citing *CBD v. BLM*, 746 F. Supp. 2d 1055, 1080 (N.D. Cal. 2009)).

In 1978, BLM promulgated regulations codifying E.O. 11644’s minimization criteria. See C.F.R. § 8342.1. Both E.O. 11644 and BLM’s implementing regulations require that BLM must do more than simply list the minimization criteria and note that they were considered. *Id.* Instead, BLM must document and explain how the minimization criteria was applied when making specific route and area designations.

<sup>12</sup> EA at 2-6: “*The Proposed Action emphasizes balanced levels of public access and resource protection. . . . This alternative emphasizes multiple-use management by protecting sensitive resources, while providing recreation and travel opportunities.*”

<sup>13</sup> Pursuant to NEPA, BLM is required to assess how the proposed action may directly, indirectly, and cumulatively impact the environment. Direct impacts are caused by the action and occur at the same time and place. See 40 C.F.R. §1508.8. The direct impacts of an action must be analyzed based on the affected interests, the affected region, and the locality in which they will occur. 40 C.F.R. § 1508.27 (a). Indirect effects are effects that are caused by the action but occur later in time or are further removed in distance. 40 C.F.R. § 1508 (b). Indirect effects “may include growth inducing effects or other effects related to induced changes in pattern of land use; population density or growth rate; and related effects on air, water, and other natural resources.” *Id.* Finally, cumulative impacts are “the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 40 C.F.R. § 1508.7. Cumulative impacts can result from “individually minor but collectively significant actions taking place over a period of time.” *Id.*

## **Administrative Routes:**

BLM proposes designation of 64 miles of administrative routes, in addition to the 125 miles of open routes. We endorse the designation of administrative routes – when a specific need can be identified. But a look at the purple lines on the Proposed Action map causes considerable skepticism that all 64 miles are needed. It is implausible that every spur, loop, and nearby parallel route shown has any distinct administrative need.

There is a surprisingly tangled maze of perhaps ten miles of proposed administrative routes east of Crooked Creek Road. Are all these roads really even there? Many of these routes do not appear at all on any of the four alternatives in the 2015 RMP. How can routes BLM did not even know about in 2015 be administratively necessary now? This entire maze is in an area designated as Land with Wilderness Character (LWC). Extra consideration should be given to eliminating administrative motorized routes within LWCs. See the “**NEPA Compliance**” section above addressing impacts to the environment.

Other improbable complex networks of “purple” administrative routes extend south from Gyp Springs Road. Unfortunately, as with non-motorized routes, BLM again did not provide a comprehensive listing of routes to be designated for administrative use with route numbers, mileages and administrative purpose.

Any route that doesn’t have a clearly documented administrative need, not satisfiable in any other way, should be closed. BLM needs to be willing to tell themselves “No.”

Although administrative routes are open to non-motorized recreation, most are not particularly valuable for that purpose – especially the complex networks mentioned above. There are some possible exceptions such as Timber Canyon and Turkey Flat. Any administrative routes valuable and desirable for non-motorized recreation should be appropriately signed on the ground, and shown on maps provided to the public of non-motorized and non-mechanized opportunities. Other administrative routes should not be on these maps.

## **Rerouting Roads:**

BLM proposes to reroute 1.7 miles of the west end of Stockman Trail and 2.55 miles of Red Pryor Road. More road building in the Pryors which already have a redundancy of poorly maintained roads is of concern. There must be a compelling reason for doing so.

The rationale for rerouting Stockman Trail is to “*confine the route to BLM-administered land*” rather than private land. This is a reasonable idea, but is it necessary? Stockman Trail has been where it is for many decades. (It used to be called “Bent Trail.”) There must be a prescriptive easement on the route across private land. If so, there is no need to reroute the road (i.e. to build a new road).

The rationale for rerouting Red Pryor Road is to “*improve erosion issues and lessen current resource impacts.*” Again this is a reasonable idea. The current route is definitely problematic. But a better option would be to close and rehabilitate the existing Red Pryor Road, and use an already existing alternative route to the same place. From Helt Road take the eastern part of Horse Haven Road (PM1028) to the Red Pryor Divide Road (PM1029) which goes northeast to the FS boundary where it becomes FS route 2091 which soon meets the route from the Red Pryor Road.

Thus both the financial costs and environmental impacts of building 4.25 miles of new road would be avoided.

## **The BLM Must Prepare an EIS:**

Because the TMP threatens significant impacts, BLM must prepare an EIS<sup>14</sup> for rerouting roads. Rerouting roads as proposed means constructing 4.25 miles of new roads. That has significant environmental effects. The maps in the EA are inadequate to show precisely where the reroutes would be, and therefore to evaluate their potential impacts.

---

<sup>14</sup> A federal agency must prepare an EIS when a major federal action “significantly affects the quality of the human environment.” 42 U.S.C. § 4332(2)(C); 40 C.F.R. § 1502.4. A federal action “affects” the environment when it “will or may have an effect” on the environment. 40 C.F.R. § 1508.3 (emphasis added); *see also Airport Neighbors All. v. U.S.*, 90 F.3d 426, 429 (10th Cir. 1996). The significance of a proposed action is gauged based on both context and intensity. 40 C.F.R. § 1508.27. Context “means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality.” *Id.* § 1508.27(a). Intensity “refers to the severity of impact,” and is determined by weighing ten factors, including “[1] [t]he degree to which the proposed action affects public health or safety,” “[2] [u]nique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas,” “[3] [t]he degree to which the effects on the quality of the human environment are likely to be highly controversial,” “[4] [t]he degree to which the possible effects

The EA's analysis of the impact of the new road construction is inadequate, and sometimes dismissive and superficial. For example:

#### Soils:

The EA raises question of how construction of reroutes would affect soils, then asserts, "*Under the Proposed Action, construction of reroutes would not impact soils. .... Passive reclamation would occur on the current route after closure.*" (Table 2-4, page 2-12. Underline added.)

Later the EA contradicts this claim, but quickly dismisses the impact as "negligible":

*"Construction of the reroutes and new non-motorized routes would result in soil disturbances from construction related activities and long-term compaction; however, the mileage of new routes and reroutes within the TMA travel system is negligible .... Implementation of the Proposed Action would not result in long-term, irreversible impacts* (EA page 3-7).

And,

*"As decommissioned routes are naturally restored, soil erosion would be reduced, .... Seasonal closures, during the late spring months, would provide a beneficial effect to soil resources due to the reduced potential for compaction, rutting, and erosion during the wettest periods of the year* (EA page 3-7)."

"Passive reclamation" and "naturally restored" basically mean do nothing. In some situations that may be best. But Red Pryor Road is so badly eroded and prone to erosion that BLM wants to abandon it for a reroute. It "goes straight up hillsides, creating fall lines for water drainage and forms deep tread ruts (EA page 2-6)." It will not "naturally restore" by "passive reclamation." The EA proposes only 0.1 mile of "limited seasonal" route in the TMP (pages 3-21 & 3-23).

#### Noxious Weeds:

In the EA BLM optimistically dismisses the impact of reroute construction as temporary and not long-term or irreversible.

*"Under the Proposed Action, existing distribution and spread of invasive weeds would be increased during reroute construction. However, impacts are expected to be temporary and would not result in long-term or irreversible impacts* (EA, page 2-11. Underline added.)"

The EA includes a confusing claim regarding natural restoration from noxious weed infestation with treatment efforts.

*Route closures alone do not necessarily improve noxious weed conditions. However, over time it is anticipated that closed routes would naturally restore and weed concentrations would diminish along closed routes with treatment efforts* (EA page 3-30. Underline added.)."

By definition noxious weeds will not naturally diminish. Intensive treatment is necessary.

Some of us have helped organize and participated in volunteer weed control efforts in the Pryors (BLM and FS). We also occasionally carryout unscheduled "vigilante" weedpulls when we notice knapweed along a road while recreating. We are aware that neither BLM not FS has adequate staff and funding for sufficient weed control in the Pryors (and other TMAs). Several species of noxious weeds are expanding substantially in the Pryors.

#### Wildlife:

We consider "wildlife" to include the unique botanical species and plant communities in the Pryors. The Red Pryor Road reroute is within a Montana Native Plant Society designated Important Plant Area. We do not know whether, or how, rerouting might impact this irreplaceable value. This was apparently not considered in the analysis. Depending on location, there may not be any direct effects on these species and communities. But noxious weed infestations spreading from any ground disturbing project without adequate eradication will certainly have indirect long-term effects.

We appreciate BLM's good intentions regarding restoration and maintenance etc. (weeds, erosion, etc.). We are also very sympathetic with BLM's challenges due to limited staff and funding – and ten other TMAs to manage. If

---

on the human environment are highly uncertain or involve unique or unknown risks[,]” and “[5] [w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts.” *Id.* § 1508.27(b)(2)–(5), (7). For this latter factor, “[s]ignificance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.” *Id.*

BLM does not have the staff and funding to properly restore the old road, and maintain new roads, it would be prudent not to build a new roads at all. This is especially true since there are good alternatives to both road rerouting projects that would be both less costly and have less environmental impact.

Stockman Trail: Leave it in its current location with a prescriptive easement.

Red Pryor Road: Close the road, or convert it into a superb motor-free route to help correct that deficiency. Then use the alternate route via Horse Haven Road, and Red Pryor Divide Road for motorized access. Any available funds would be better used to actively restore the worst places on Red Pryor Road, and do some maintenance on Red Pryor Divide Road.

### **Miscellaneous Corrections:**

Given the magnitude of the task, and the level of detail required, to develop this EA and TMP, it was perhaps inevitable that a number of errors crept into the document without being caught. We found several that should be corrected.

#### Roads within WSAs and LWCs:

Tables 3-21 and 3-22 (EA, page 3-28) report 26 miles of open roads (BLM, County roads and highways – not including administrative routes) within the Wilderness Study Areas (WSAs) and Lands with Wilderness Characteristics (LWCs). This is not possible given the criteria for designating WSAs and LWCs. We suspect the roads reported are on the boundaries – not “within” - the WSAs and LWCs.

#### Misnamed Road:

The “Trail Name” given for second trail listed in Table 3 (Appendix B, page 3) is “Bear Canyon Ridge Road (proposed for closure).” But the route number, PM 1034, in the table apparently refers to the Big Sky Trail.<sup>15</sup> And the mileage, 0.9 miles, is consistent with the Big Sky Trail.

#### Rocky Juniper Trail:

Table 2-2 (EA page 2-4) erroneously reports 2.3 miles of non-motorized route in the No Action Alternative. The No Action Alternative map (EA, page 2-5) erroneously shows the Rocky Juniper Trail. The 2.3 miles reported in the table is consistent with the trail on the map including the southern extension to Helt Road. But...

1. There were no designated non-motorized trails in the Pryor TMA prior to 2015 RMP. Appendix O is the first BLM document to mention this trail (Table O-2, page O-9). But Appendix O was not included in the Approved Final RMP.
2. All the maps in the EA and TMP show the Rocky Juniper Trail parallel to, but approximately ¼ mile east of its actual location. It appears from Google Earth that the “trail” as marked on the maps follows a (usually) dry wash – not the actual hiking route which is the other side of the ridge to the west. The actual trail begins at an obvious spur road north from Horse Haven Rd. There is an abandoned road with a BLM constructed jackleg barrier at the start of the trail. This road soon peters out and the trail continues north following game trails. (The “trail” shown from Helt Rd. to Horse Haven Rd. does not exist on the ground.)  
See <http://www.pryormountains.org/welcome-to-the-pryors/hiking-in-the-pryors/hikers-haven-area-3-trails/rocky-juniper-trail/> for a description, photos, and a GPS track on a topo map of the Rocky Juniper Trail.

Parts of the Rocky Juniper Trail will need to be “delineated by rock cairns or other minimal structures” as described in the EA and TMP for the Sykes Arch and Demijohn Loop Extension Routes.

---

<sup>15</sup> See “Pryor Mountain – Travel Management Area” map in the 2015 RMP mentioned above.

There is still a bit of confusion in that a map in the Proposed Final RMP labels the Big Sky trail as PM 1034, but a table in Appendix O uses PM 1035.

**Conclusion:**

We hope our recommendations above will help the Billings Field Office in developing a final Travel Management Plan to help preserve the Pryor Mountain Landscape for its wild inhabitants, and for human visitors, long into the future.

Sincerely,

Dick Walton  
**The Pryors Coalition**  
[info@PryorMountains.org](mailto:info@PryorMountains.org)

Mike Penfold, Field Program Director  
**Our Montana, Inc.**  
P.O. Box 699  
Billings MT 59103

Dave Chadwick, Executive Director  
**Montana Wildlife Federation**  
P.O. Box 1175  
Helena, MT 59624

Bonnie Rice, Senior Representative  
Our Wild America Campaign  
Sierra Club  
P.O. Box 1290  
Bozeman MT 59771

Randy Thomsen, President  
**Beartooth Back Country Horsemen**  
P.O. Box 614  
Absarokee MT 59001

Clinton Nagel, President  
**Gallatin Wildlife Association**  
[clint\\_nagel@yahoo.com](mailto:clint_nagel@yahoo.com)

Nancy Ostlie and Linda Healow  
**Great Old Broads for Wilderness,**  
Bozeman Broadband  
[bnzbroadband@gmail.com](mailto:bnzbroadband@gmail.com)