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### **BiFO Planners,**

Please accept the following comments from the Pryors Coalition and partners<sup>1</sup> on the November 2020 updated Draft Pryor Mountain TMA Travel Plan and Environmental Assessment. The Pryors Coalition is a collaboration among a number of organizations and many concerned individuals who may or may not be associated with those organizations. The defining characteristic of Pryors Coalition and partners (organizations and individuals) is a strong desire to preserve this very special and vulnerable landscape for the future.

We appreciate that considerable work has been done updating the draft TMP since the 2019 draft. A number of modifications have been made addressing suggestions and concerns in our December 6, 2019 comment letter.

It is an important step forward to designate routes for non-motorized and non-mechanized recreationists. When finalized these will be the first quiet and peaceful routes designated in the Pryors for hikers and equestrians free from the speed, commotion and other impacts of mountain bikes and motor vehicles.

However, we are dismayed when we look at the numbers in Table 2-2 (EA page 2-12). The draft TMP proposes 115 miles of roads open to “all types of motorized and mechanized vehicle use at all times” (EA page 2-1), plus another 17 miles for *motorized* e-bikes, and 2.6 miles for limited width OHVs – a total of 134 miles of motorized routes. Yet only 11 miles of trails are proposed for quiet non-mechanized use only! Both the 19 mile *increase* in motorized routes (from the no-action alternative), and the 17 miles of new e-bike routes are each greater than the 11 *total* miles of motor-free and mechanized-free routes.

Most of the 134 miles of motorized routes in the Pryors TMP are only accessible to the minority of people with ATVs or rugged 4WDs. Most people don’t have a trailer load of expensive ATVs and a truck to haul them. Many other people want to gently experience the special Pryors landscape, wildlife, wildflowers and scenery. They want opportunities where they can drive an ordinary car to a trailhead, put on their walking shoes and go. They would like a network of signed motor-free and mechanized-free routes with maps provided by the BLM similar to those provided to motorized recreationists.<sup>2</sup>

### **A. The draft TMP does not satisfy its stated purpose**

BLM states on the first page of the EA:

“The purpose of the action is to provide a logical and sustainable travel and transportation network that addresses the diversity of access and recreational needs of the public...” (page 1-1, underline emphasis added here and below.)

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<sup>1</sup> Our Montana, Beartooth Back Country Horsemen, Sierra Club, WildEarth Guardians, Gallatin Wildlife Association, Great Old Broads for Wilderness, Gallatin Yellowstone Wilderness Alliance, Montanans for Gallatin Wilderness.

<sup>2</sup> Most people also don’t have expensive mountain bikes, and many don’t have the athletic ability to ride bikes on the rugged terrain. They would like a peaceful trail without speeding bikes.

With only 11 miles of motor-free and mechanized-free trails, the draft TMP clearly fails to adequately address the “access and recreational needs” of hikers and equestrians – the most traditional recreational users of public land.

The EA states:

“The Proposed Action provides a balanced recreation system for the long-term sustainable management of recreation trails and other resources. Recreation opportunities would be improved for all types of users. User conflicts would be reduced by providing some segregated routes that allow pedestrian and equestrian users to recreate on routes that are not open to motorized or mechanized uses.” (EA page 3-25)

We do not understand how 11 miles of designated motor-free and mechanized-free routes, versus 134 miles of motorized routes can be considered “balanced.” It is true that recreation opportunities would be improved for hikers and equestrians. But it is only true because the proposed 11 miles of designated motor/mechanized-free routes is greater than the current *zero* miles. Similarly it is true that 11 miles of segregated routes will reduce conflicts for “pedestrians and equestrians” – but only compared to *zero* miles. As proposed, providing 7.6 percent of trails to resolve conflicts between motorized and non-motorized recreational uses falls far short of providing a balanced system.

We are pleased that BLM recognizes the well known conflict between recreationists on-foot, and wheeled recreation (both motorized and mechanized). But much more needs to be done to adequately minimize this conflict among recreational uses, which ultimately must be resolved through proper management. BLM acknowledges that, “Non-mechanized recreation (hiking and equestrian uses) is also expected to increase in the TMA.” (EA page 4-1)

The EA states:

“The Proposed Action would increase opportunities for public access by creating a route system with increased opportunity for non-motorized and non-mechanized users while still maintaining motorized access.” (EA page 3-21)

Opportunities for hikers and equestrians are minimally increased, compared to abundantly “maintaining motorized access.” As the EA states:

“Open routes are distributed throughout the TMA to provide a complete network of recreational opportunities, including recreational loops for motorized recreation.” (EA page 3-25)

Hikers and equestrians also desire “a complete network of recreational opportunities including loops....” BLM seems to acknowledge this in the TMP:

“A key component of travel management implementation is having an overall network design governed by the following principles:” (Appendix B, page 13) including:

- “Provide access to primary gateways, create loops, provide long-distance trail experiences, provide trails for different types of users....”
- “Maintain high quality recreational experiences and provide a range of access opportunities for a wide variety of users.”

However the Proposed Action does not satisfy these principles. Elsewhere in this letter we describe several opportunities BLM has to begin to correct this serious deficiency in the proposed travel network.

BLM staff have suggested that the 11 miles of non-mechanized trails are supplemented by administrative and closed routes that are available for hikers and equestrians. This is a spurious claim.

1. Hikers (and equestrians) merit high quality and interesting trails specifically selected and designated *for* foot-travel – not leftovers from some other purpose. Most administrative routes are not particularly interesting for recreation. According to the EA (page 2-8) “BLM has designated routes for administrative ... use primarily based on the route’s use for livestock operations and range improvements.” Hikers and equestrians are not excited by trails to scenic stock tanks.
2. People (especially those unfamiliar with the Pryors) should be able to go to the BLM or USFS office (or website) and get directions and maps to more than 11 miles of quality, signed, wheel-free trails. Maps showing abundant routes are available for ATV riders.

## **B. Minimization Criteria**

We do not see that BLM has properly adhered to and applied the minimization criteria in President Nixon's 1972 Executive Order 11644 and President Carter's 1977 Executive Order 11989.<sup>3</sup> As the Wilderness Society paper, submitted with this letter, says:

“The executive orders require that areas and trails designated for ORV use be located to minimize: damage to soil, watershed, vegetation, and other public lands resources; harassment of wildlife and significant disruption of wildlife habitat; and conflicts between ORV use and other existing or proposed recreational uses.”<sup>4</sup>

We are convinced that a thoughtful application of the minimization criteria would lead to a reduction of the number of redundant motorized trails. That would minimize impacts on the landscape, wildlife and vegetation. Reducing the number of redundant and/or unneeded motorized trails (public and administrative) would also reduce agency maintenance costs (road, weed control, and enforcement).

Some of these routes might then be designated for non-mechanized use only to help minimize conflicts between mechanized uses and hikers and equestrians, thereby creating a more complete trail system for hikers and equestrians. Both of these actions (reducing motorized routes and increasing mechanized-free routes) would reduce the imbalance in the travel network.

## **C. Affected Environment and Environmental Consequences**

Chapter 3 of the EA addresses the environmental impact or consequence of the proposed action. The first paragraph includes the sentence: “An environmental impact or consequence is a modification or change to the existing environment resulting from an action.” (EA page 3-1) This standard is too low. A Travel Plan should be evaluated on the basis of its total impacts, direct, indirect and cumulative of the entire designated system, not just on whether it is no worse than the old travel plan from many years ago. The minimization criteria should be applied to motorized trails and areas (including e-bikes) throughout the planning area, including increases in motorized use as a result of modifications and changes to current designation. The agency must adequately analyze the actual impacts collectively – not just the changes in impacts.

Even by the low standard used in the EA the conclusions regarding environmental consequences of the Proposed Action in Chapter 3 are considerably overstated and sometimes misleading.

The conclusions regarding the environmental impact of the Proposed Action on Soil Resources state:

### **3.1.2.2 Proposed Action**

Under the Proposed Action, there would be fewer open routes than under the No Action Alternative and route density would be reduced by closing and decommissioning routes. Soil compaction and rutting would decrease on routes closed to motorized and mechanized uses. A total of 7.3 miles of route located on soils with high water erodibility would be closed. An additional 11.4 miles of routes located on soils with moderate wind erodibility and 3.0 miles of routes with moderate water erodibility would be closed. As decommissioned routes naturally revegetate, soil erosion rates would decrease. Table 3-3 presents designated routes within areas with high or moderate wind or water erosion potential under the Proposed Action. (EA page 3-6)

The first sentence claim about “fewer open routes” is contradicted by information elsewhere in the EA including Table 3-13 which shows Open route mileages as 115.1 and 114.9 miles in the No Action and Proposed Alternatives respectively. The 0.2 mile difference is both inconsequential and less than measurement uncertainty. This claim also ignores the *additional* 16.8 miles of E-bike routes, and 2.6 miles of Limited OHV Width routes in the Proposed Action. In the Proposed Action the number of miles of routes open to motorized use *increases* by 16.7%.

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<sup>3</sup> These executive orders are cited in the EA (page 1-2), Appendix B (pages 11 and 12), and reproduced in Appendix C, but not addressed in route designation decisions, or in the Chapter 3 analysis of environmental consequences.

<sup>4</sup> “Achieving Compliance with the Executive Order “Minimization Criteria” for Off-Road Vehicle Use on Federal Public Lands: Background, Case Studies, and Recommendations,” The Wilderness Society, May 2016.

The paragraph continues by citing positive impacts of “closing and decommissioning routes” on soil compaction and rutting, and soils with high wind erodibility, and moderate wind and water erodibility.

But the data in Tables 3-2 and 3-3 (EA pages 3-6 and 3-7) tell a different story. Since there are 115 miles of designated Open public routes which get by far the most use, those are the most important rows in the tables. Comparing the two tables shows only small changes in miles of open routes located on erodible soils. There is a small increase in miles on moderate wind erodible soil (52.6 to 55.5 miles), and a small decrease in miles on moderate water erodible soils (11.1 to 6.8 miles). There is a greater increase in miles of e-bike and limited width OHV routes on erodible soil (12.8 miles total). Those routes will also get high public use.

On the other hand the two tables show that the only substantial reduction in miles of routes on erodible soils is in the “Limited Administrative and Authorized Users” designation. These routes get very little use because very few people are authorized to use them. They do not get daily use by numerous public recreationists. The closed routes cited in the EA paragraph above are almost all administrative routes that are proposed for closure – not publicly open routes.<sup>5</sup> Furthermore the administrative routes proposed for closure are presumably unneeded and so probably are rarely or never used as acknowledged in the EA.<sup>6</sup> Thus the beneficial impacts of the proposed action claimed in the above EA paragraph are only on paper – not on-the-ground. Currently unused routes designated as “Administrative” will now be designated as “Closed” and continue to be unused.<sup>7</sup>

Similar comments can be made about the EA analyses of impacts on Wildlife Resources (bighorn sheep and sage grouse) and Cultural Resources. (See Table 1 below.) In *every* case the Proposed Action *increases* the impact of heavily used *public* roads (open, e-bike, and limited width OHV) on the resource. In each case reduction of impacts is due to designation changes closing rarely (or never) used administrative routes. These are probably not real on-the-ground changes, but only paper changes as unused administrative routes are reclassified as closed.<sup>8</sup>

**Table 1. Changes in miles of Motorized Public and Administrative Routes impacting various resources in designated Proposed Action.**

Resource	Data Source EA Table	EA Page	Frequently used Public Motorized Routes (miles) <sup>2</sup>		Infrequently used Administrative Routes (miles) <sup>2</sup>
<b>Erodible Soils<sup>1</sup></b>	3-2 & 3-3	3-6&7	83.8 - 72.2 = +11.6	+16%	50.4 – 84.3 = -33.9
<b>Bighorn Sheep Habitat</b>	3-6	3-9	26.2 - 20.7 = +5.5	+26%	4.8 – 19.1 = -14.3
<b>Sage-Grouse PHMA</b>	3-7	3-11	43.6 – 37.5 = +6.1	+16%	29.9 – 38.1 = -8.2
<b>Sage-Grouse GHMA</b>	3-8	3-11	18.1 - 15.0 = +3.1	+20%	5.6 – 20.4 = -14.8
<b>Sage-Grouse Lek</b>	3-9	3-11	23.5 – 20.0 = +3.5	+17%	17.8 – 24.4 = -6.6
<b>Cultural Sites (100 ft)</b>	3-10	3-15	9.7 - 8.7 = +1.0	+11%	2.0 – 3.8 = -1.8
<b>Cultural Sites (0.25 mile)</b>	3-10	3-15	47.5 – 38.9 = +8.6	+22%	12.2 – 30.0 = -17.8

<sup>1</sup> Includes severe, high and moderate wind and water erodible soils.

<sup>2</sup> Includes open, e-bike, and limited width OHV routes. (Proposed Action) – (No Action) = (Change)

<sup>5</sup> A few routes open to the public are being closed, but a similar, or greater, number of miles are proposed to be opened in the Proposed Action.

<sup>6</sup> “A total of 32.2 miles of existing routes would be closed under the TMP and Implementation Plan. This includes a total of 22.2 miles of routes are no longer used and are naturally reclaimed.” (Appendix B, page 26)

<sup>7</sup> Most of the 120 miles of “administrative” routes in the TMP No Action Alternative were shown in the 2015 RMP as “Closed” and explicitly distinct from “Administrative.” Somehow these “Closed” routes (in the RMP No Action Alternative) became “Administrative” routes (in the TMP No Action Alternative) and half of them are now proposed to be “Closed” again. This seems to be all paperwork, not on-the-ground action.

<sup>8</sup> Furthermore the use of public roads will increase as population increases. The use of administrative routes is likely to remain relatively constant.

Regarding Greater Sage-Grouse the EA concludes:

“Both alternatives would result in continued and increased use of routes located within greater sage-grouse habitat. Route use would continue to cause impacts to this species and its habitat. Route closures and limitations would have long-term beneficial effects to the greater sage-grouse and its habitat through reduction of the types of impacts listed above.” (EA page 3-10)

The third sentence appears to contradict the first two. Our Table 1, and BLM’s tables in the EA, show that public motorized routes in the proposed action will have increased impacts on sage-grouse. The “beneficial effects to greater sage-grouse” are due to closure (on paper) of unused administrative routes.

## **D. E-Bikes**<sup>9</sup>

BiFO staff are certainly not responsible for the trouble caused by S.O. 3376 regarding e-bikes. All the established policies and language about motorized, non-motorized, mechanized, and non-mechanized route designation have been thrown into Orwellian turmoil. The obvious problem is the intrinsic contradiction in pretending a motorized bike does not have a motor. Travel planning and trail designation were already fraught with controversy and challenges for land managers. Neither we nor BLM needed this extra problem.

Hikers and equestrians typically find mountain bikes incompatible with the desire for slower and more gentle foot travel – free from the speed and commotion of wheeled vehicles. This is a very asymmetric conflict which many mountain bikers don’t understand.<sup>10</sup>

With or without S.O. 3376, there are e-bikes now. In the past the primary division of recreational roads and trails was motorized vs. non-motorized (with tension between mountain bikes, and hikers and equestrians). We have heard little objection from mountain bikers to permitting e-bikes on mountain bike routes. But the inclusion of e-bikes with mountain bikes greatly increases the conflict between mechanized and non-mechanized use – again a very asymmetric conflict. Therefore the primary division of recreational trails now should not be non-motorized vs. motorized, but non-mechanized vs. mechanized. i.e. feet vs. wheels (with or without motors).

It is obvious that *motorized* e-bikes are incompatible with foot travel (human or horse). An e-bike with a 750 watt<sup>11</sup> motor may be “low power” compared to most dirt bikes, but it is *high power* compared to human powered bikes. 750 watts is four or five times the power output of a fit recreational human peddler, and roughly double the power output of a professional Tour de France cyclist.

The Proposed Action for the Pryors TMP includes 115 miles of routes suitable for e-bikes (and mountain bikes) – even without considering the proposed Red Pryor Area bike playground. As noted above proposed wheel-free (non-mechanized) routes are extremely limited.

If “non-motorized” mountain bike trails permit these superhuman electric bikes, BLM travel planners have a greater obligation than before to designate abundant *non-mechanized*, wheel-free trails for ordinary people.

## **E. Discussion of Specific Routes:**

### **1. Timber Canyon Trail, PM1122**

We are pleased that the BLM proposes conversion of the Timber Canyon Trail from open to all motor vehicles, to non-mechanized use only as we had suggested. This will provide a valuable opportunity for recreation free of wheeled commotion. It also provides access to a motor-free area of Forest Service land where hikers and equestrians can travel to higher elevation landscapes.

This conversion is a small positive step toward meeting the minimization criteria (impacts on the landscape, conflicts between recreational uses), and the imbalance of motorized and motor-free routes.

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<sup>9</sup> E-bikes are a neat new technology with many appropriate uses. But there are some places they do not belong.

<sup>10</sup> Some of us are also mountain bikers, who do understand the conflict and the need for segregated routes.

<sup>11</sup> The 750 watt limit on class 1, 2, and 3 e-bikes is not mentioned in the Pryors TMP EA. That may not matter because it is unenforceable. Electric mountain bikes are already available with motors greater than 750 watts. It is easily foreseeable that both the power and battery capacity of e-bikes will increase rapidly as the technology develops.

## **2. Water Canyon Trail, PM1121**

We are tentatively pleased with the proposed designation of the Water Canyon Trail. But we are concerned with conflicting information in the EA. The EA (page 2-10, and Appendix B, page 5) states:

“The Water Canyon Road would be designated as limited to administrative and authorized uses. The public would have access to this route for non-mechanized use, including hiking and equestrian uses.”

We approve of and endorse this designation assuming there are legitimate administrative needs for the route.

Water Canyon Trail, like Timber Canyon Trail, provides access to a secluded area of FS land. With a scramble out of Water Canyon the two routes can be connected to make a great loop hike.

Our serious concern is with conflicting language in Appendix E (page E-3):

“The Water Canyon Trail would allow hiking, bicycling (including e-bikes), and equestrian uses only. No motorized use would be allowed.” (This statement is included twice on page E-3.)

We hope this conflicting language is erroneous and will be corrected. The EA states (page 3-24) that on administrative routes e-bikes are: “Not Allowed (unless e-bike user has administrative and authorized access to the route)” We approve this exception permitting authorized e-bike use on this administrative route. But emphatically oppose all public mechanized use on Water Canyon Trail.

Permitting public e-bike use on Water Canyon Trail is inconsistent with the stated BLM policy for administrative routes: only non-mechanized public use is permitted. Further, e-bikes have a motor and thus should be considered a motorized vehicle subject to the requirements under EO 11644 as amended. The BLM’s failure to recognize e-bikes as a motor vehicle does not absolve it of its regulatory duties when designating trails for e-bike use. Further, the Forest Service recently affirmed e-bikes are motor vehicles and subject to its travel planning process under 36 C.F.R. 212 Subpart B. 85 FR 60129.

Limiting Water Canyon to non-mechanized public use (like Timber Canyon) would help address the minimization criteria, recreational use conflicts, and the imbalance between motorized/mechanized trails and non-mechanized routes. Permitting public mechanized use (*motorized* e-bikes or not) would eliminate another opportunity to address the severe deficiency of non-mechanized routes. It would also increase the threat to the “sensitive cultural resources” in the area. “The route ... would be designated as a non-motorized trail because of sensitive cultural resources....” (Appendix E page E-3)

The EA states: “The trail [Water Canyon] is open to motorized use on connecting USFS routes; therefore, no conflicts in management for e-bike use would occur.” (Appendix E page E-3) The only connecting USFS route (not routes) is a ½ mile, dead-end extension of the Water Canyon Trail. Permitting public mechanized use (motorized or not) on this 1.6 mile (total BLM and USFS) route has minimal benefit compared to the advantages, mentioned above, of designation as administrative with public non-mechanized use permitted. The EA fails to demonstrate how the agency is minimizing conflicts among motorized and non-motorized recreational uses since e-bikes are functionally a motor vehicle, and it provides no sufficient rationale to permit e-bikes on the trail.

## **3. Pygmy Panther, Bear Canyon, Rocky Juniper, Big Sky and Doug Fir Trails<sup>12</sup>**

We are very pleased with the proposed designation of these five trails for non-mechanized use only. Though several of these are quite short on BLM, they all provide access to continuing (as yet undesignated) USFS routes – most within the Bear Canyon Recommended Wilderness Area.

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<sup>12</sup> PM1071, 1072, 1070, 1145, 1034, 1033.

There may be a misunderstanding regarding the Rocky Juniper Trail (PM1145). It is 1.4 miles on BLM to the USFS boundary fence. The popular but unofficial trail, as described on [www.PryorMountains.org](http://www.PryorMountains.org) since 2012, turns *west* a short way along the fence and then *north* on USFS to where it meets the Bear Canyon Trail switchbacks out of the canyon, and the *far west end* of the Big Sky Trail. BLM’s online ArcMap instead shows the Rocky Juniper Trail turning *east* along the fence to intersect the Big Sky Trail where it first reaches the USFS boundary.

A few more details: The Bear Canyon Trail is 0.48 miles rather than the 0.28 miles in the EA. The Rocky Juniper Trail is 1.4 miles to the USFS fence rather than the 1.7 miles in the EA. (The 1.7 miles includes the USFS section north of the fence to the junction with Bear Canyon and Big Sky trails.) We do not understand what is meant by “The Big Sky Trail is a 4.0-mile round-trip hike....” (EA page 2-9) The Big Sky Trail is “just over one mile on BLM-administrated land” (Appendix E page E-1).

However we are quite disappointed in the rationale given for designating these routes for non-mechanized use only. The following quotes are from Appendix E pages E-1 & 2, emphasis added.

[Bear Canyon] “The trail would not be desirable for mountain biking or e-bike use because of the short mileage and lack of loop riding opportunities.”

[Big Sky] “...recreationists riding bikes (including e- bikes) would likely choose other routes with longer riding opportunities.”

[Doug Fir] “Considering this trail is less than 0.5 mile on BLM-administrated land, recreationists riding bikes (including e-bikes) would likely choose other routes with longer riding opportunities.”

[Pygmy Panther] “With lack of a tread-defined path, mechanized use would not be authorized.”

[Rocky Juniper] “The terrain is a very steep and rocky uphill trail for the first 0.25 mile, with grades exceeding sustainable margins for bicycling.”

Nowhere does the rationale for these routes include a *positive* statement that they are designated as non-mechanized because there is a public need for quiet foot-trails without the commotion of wheeled vehicles. The rationale given is only *negative* comments suggesting the trails would not be of interest to bikers. Furthermore the rationale given is unconvincing and might be reversed by future BLM staff. BLM needs to argue *for* more wheel-free non-mechanized routes – not just consider that as a left-over designation after all other designations are rejected.

#### **4. Sykes Arch Trail, PM1147**

Thanks to BLM for being responsive to our request for this excellent hiking opportunity. We hope collaboration with BCNRA (NPS) will soon allow development of this trail. Please keep us informed of progress.

#### **5. Red Pryor Trails Area, PM1024**

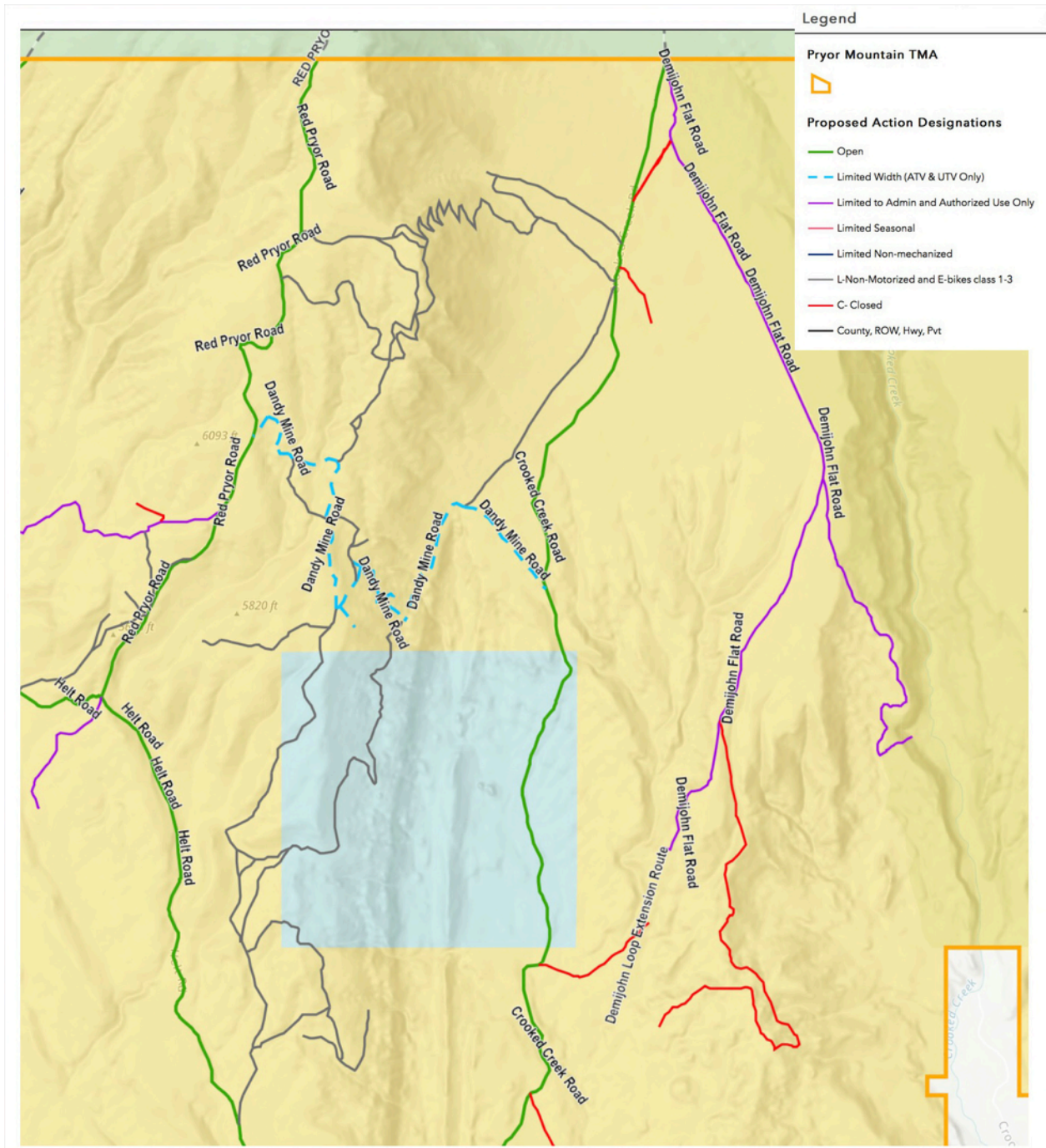
We are very disappointed that the Lisbon-Dandy hiking and equestrian loop hike we had proposed in this area has been coopted by a proposed e-bike and mountain bike play area - much of which is in a designated ACEC. Map 1 shows an exorbitant tangle of redundant routes. A bike play area is not appropriate for the special Pryor Mountain landscape - especially in an ACEC, and when there is an unaddressed need for wheel-free hiking opportunities in the Pryors. There is no need for a bike play area like the Acton Recreation Area near Billings. How is this consistent with the minimization criteria in Executive Order 11644? How does this maze impact natural and cultural resources? How does it minimize conflict between mountain bikes (including motorized e-bikes), and other recreational uses such as hiking and equestrian use? According to the EA there are at least 15 miles of trails in this maze, and more “connections between existing routes” (Appendix E page E-2) may be developed in a future EA. BLM writes that hiking and equestrian use would be allowed, but most of these users would avoid a heavily used bike and e-bike play area.

BLM notes that many “previously identified routes are no longer present or have significantly revegetated due to non-use” (Appendix B, page 4). We commend BLM for reducing the 23 miles in the 2019 EA to 15 miles in the updated EA. But most of remaining 15 miles should also be allowed to continue to revegetate, or be actively restored.

The EA states that the Lisbon-Dandy mine area “scenery is outstanding and could be complemented with an intentional trail design” (Appendix E page E-2) A 15+ mile biking (including motors) play area will not “complement” the scenery. Designating a 4 or 5 mile non-mechanized Lisbon-Dandy Loop Trail would allow hikers and equestrians to enjoy the outstanding scenery on a route accessible without a 4WD vehicle.

**Map 1: Red Pryor Trail Area and Demijohn-Penney Peak Area.**

(Detail from BLM's online ArcMap at <http://arcg.is/GyPr0>. Blue state section indicates scale.)  
The Red Pryor Trail Area is between Red Pryor Road and Crooked Creek Road.  
Penney Peak is in the lower right corner of the map, but unmarked.





## **6. Demijohn Flat – Penney Peak Trail, PM1020, 1019, 1021, 1038, 1151**

We had requested this trail as a great opportunity for an easy non-mechanized route, accessible without 4WD. With a short shuttle drive on Crooked Creek Road it can be a one-way hike without need to backtrack. Interesting side trips down to Crooked Creek and/or the top of Penney Peak are inviting options. (See Map 1.) The trail was included in the 2019 Draft TMP and called the “Demijohn Loop Extension Route.”

We are puzzled that the Demijohn Flat Trail has been dropped from the 2020 draft TMP: “The Demijohn Loop Extension Route would be closed under the updated Proposed Action.” (Draft Plan October 2019 Public Comment Response<sup>13</sup>, page 55) No rationale was given for dropping this trail.

We understand that hikers and equestrians are allowed on the administrative and closed routes that this hike would follow. But we request that BLM include this route on information and maps distributed to the public. It should be signed on the ground.

## **7. E-bike Trails parallel to Helt Rd, PM1076, 1077, 1082**

We are very disappointed to see trails parallel to Gyp Springs Road between Graham Trail and Horse Haven Rd. opened to motorized e-bikes and mountain bikes. This 4.0 mile route is, at most, half a mile from, and in clear sight of Gyp Springs Road and thus is unneeded.

In addition to being an unneeded road along which noxious weeds can be spread, this route is through Sage-grouse habitat. Unfortunately the EA does not break down route-specific environmental impacts such as to Sage-Grouse habitat, but most of the 17 miles of proposed e-bike routes are in the Red Pryor Trail Area. That area is not good sage-grouse habitat. So we presume the information on e-bike routes within Greater Sage-Grouse habitat in Tables 3-7, 3-8, and 3-9 (EA page 3-11) are mostly due to this unneeded route. According to these tables, proposed e-bike routes include 2.8 miles within sage-grouse Priority Habitat Management Area (PHMA), 3.6 miles within sage-grouse General Habitat Management Area (GHMA), and 2.5 miles within 2 miles of an active lek.

This 4.0 mile route is “closed” in the no action alternative, but designated as open to e-bikes and mountain bikes in the proposed action. (BLM’s online ArcMap). There is no disclosure or rationale for this designation in the EA other than the map. The BLM must provide rationale for opening these routes, as well as analyze and disclose the potential environmental impacts of doing so.

## **8. Administrative Routes Opened to Public Motorized Use on West slope of Big Pryor**<sup>14</sup>

The No Action Route Designation Map (See detail Map 2 below) shows a number of administrative routes (orange). There is no indication in the EA of what, if any, administrative need there is for these routes. In the Proposed Action almost all of these routes are designated “Open” to public motorized use (6.4 miles according to BLM’s online ArcMap – not counting the 1.7 miles of proposed new Stockman Trail). The EA does not provide any rationale for opening these roads to public motorized use. In fact the EA does not even disclose this action except by the colored lines on the maps.

This seems an excessive tangle of unneeded motorized routes. At most these new open routes rarely get even half a mile from the many already open routes. This excessive route redundancy creates an ATV play area which is not needed to provide public access to the Pryors. There is a significant infestation of leafy spurge along roads near this area, and spotted knapweed is increasingly a problem in the Pryors. These unneeded routes increase the opportunities to introduce and spread these, and other, invasive species. This will likely exceed BLM’s ability to monitor and eradicate invasive species. What other environmental impacts will these new routes cause? How does opening these routes to public motorized use satisfy the minimization criteria of the Executive Order 11644?

Graham Trail (PM1081, 1.5 miles) on the south slope of Big Pryor Mountain is also converted from administrative use only, to an open public motorized route without disclosure or rationale in the EA.<sup>15</sup> The BLM must provide rationale for opening these routes, as well as analyze and disclose the potential environmental impacts of doing so.

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<sup>13</sup> This document, was posted on the BLM ePlanning website on November 25, tabulates BLM responses to public comments on the 2019 draft TMP EA. We will refer to it as “Public Comment Response” in the rest of this letter.

<sup>14</sup> PM1124, 1128, 1129, 1131, 1134, 1135, 1136

<sup>15</sup> We are aware that the 2008 USFS Travel Plan opened the FS extension of Graham Trail despite the fact that it was not open on the BLM side. These two actions increase the number of routes up the south slope and again raise questions about adherence to the minimization criteria.

**9. Bent Springs<sup>16</sup> Loop Trail, PM1132, 1134**

This is an opportunity for BLM to reduce the overwhelming inequity between motorized and non-mechanized recreational opportunities in the Pryors, and reduce conflict among different recreational uses. Importantly this is an opportunity that does not depend on collaboration with the USFS since it is entirely on BLM land. It is an opportunity to create an excellent hiking loop free from the commotion of wheeled vehicles. The route would be easily accessible for hikers without 4WD.

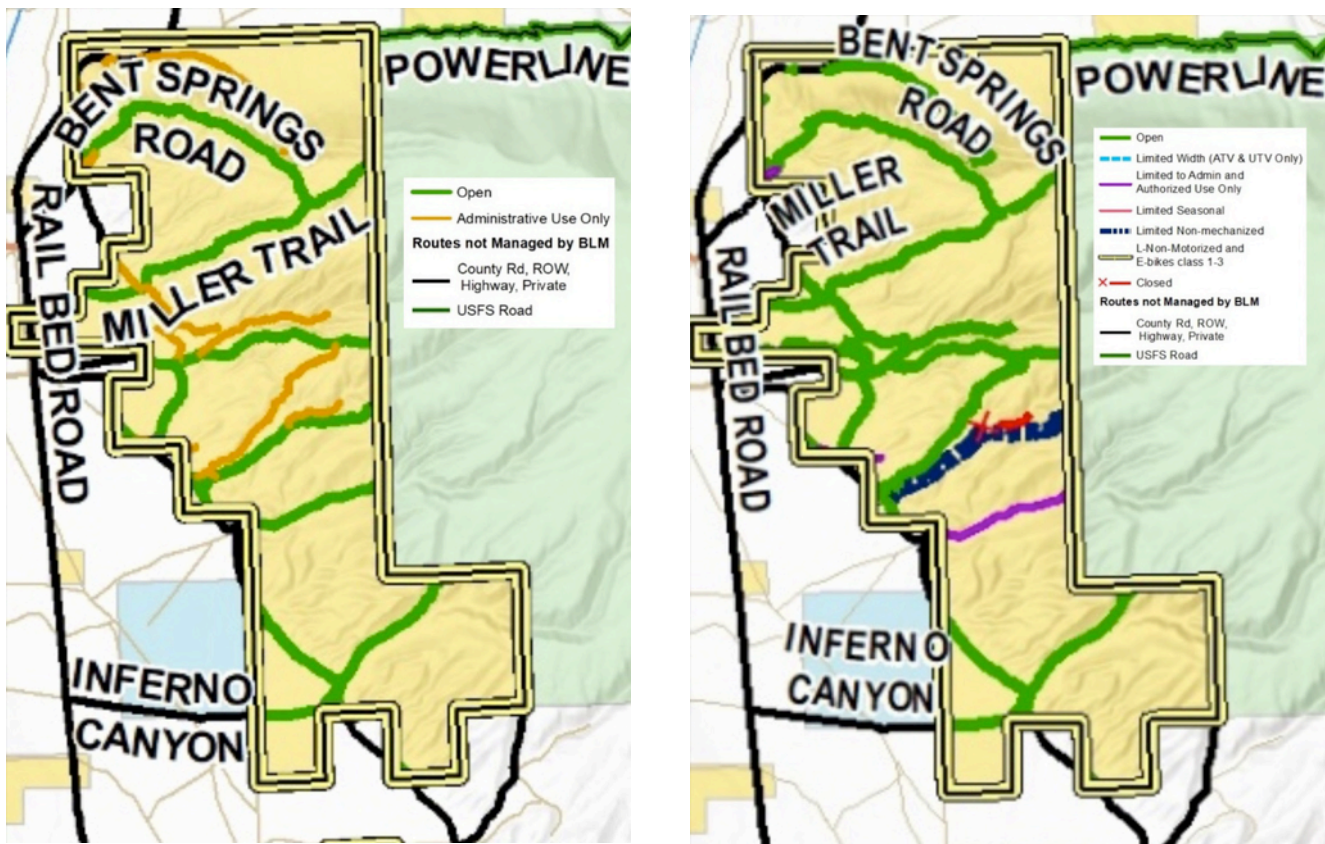
BLM’s rationale for rejecting our request for designation of this non-mechanized loop is tone-deaf.

“PM 1132 and PM1134 are proposed as open in the updated Proposed Action. .... PM1132 provides a different experience for motorized users, traversing them along the top of the Western edge of the Pryors providing a view of Pryor Gap and Sage Creek.” (Public Comment Response, Page 300)

Motorized users have 134 miles of “different experiences” including “traversing them along” edges of the Pryors like Sykes Ridge. Wheel-free users have only 11 miles of experiences in the Proposed Action. Hikers also appreciate “different experiences” and the “view of Pryor Gap and Sage Creek.” It is an easy, level walk from Miller Trail (a quarter mile or less) for ATV riders to see this view.

We again request that BLM convert the redundant Bent Springs Road, PM1132, to non-mechanized use only, and designate the unneeded administrative route to the north, PM 1134, for non-mechanized use only. Bent Springs Trail is not needed to provide access to Miller Trail continuing onto USFS land. These two routes combine to make much needed loop hike, but do not connect for wheeled vehicles. BLM provides no rationale for opening dead-end 1.7 mile PM 1134 to public motorized use.

**Map 2: West Slope Big Pryor Detail: Route Designation Maps (EA pages 2-6 and 2-11)**  
**No Action (left) Proposed Action (right)**



<sup>16</sup> We are not sure when and how PM1132 became “Bent Springs” Trail. It does not go close to Bent Springs. Bent Trail (now for unknown reasons called “Stockman Trail”) does go past Bent Springs. (See USGS Topo maps.)

## F. Rerouting of Stockman Trail, PM1143

In 2019 we recommended leaving Stockman Trail in its current location with a presumed prescriptive easement. We are pleased with BLM's response:

“The Stockman reroute would only be implemented if necessary to address the loss of public access across private property.” (Public Comment Response, page 313)

Avoiding building 1.7 miles of new road would be best for the Pryors which are already abused by too many miles of roads. We urge BLM to legally assert the public's right to the existing access by prescriptive easement. This route has been on USGS topo maps for decades as "Bent Trail," and is shown on a 1980 USFS Travel Plan map.

## G. Administrative routes designated without identified purpose

In our December 2019 comments we questioned the number of miles of administrative routes and wrote, “We endorse the designation of administrative routes – when a specific need can be identified.”

In the Public Comment Response document BLM states, “Additional administrative routes are proposed to be closed in the Updated Proposed Action.” (page 305), and “The updated Proposed Action reduces the number and mileage of administrative routes.” (page 306) But the 2020 Proposed Action includes 62.9 miles of administrative routes compared to 63.8 miles in the 2019 Proposed Action. The reduction is inconsequential.

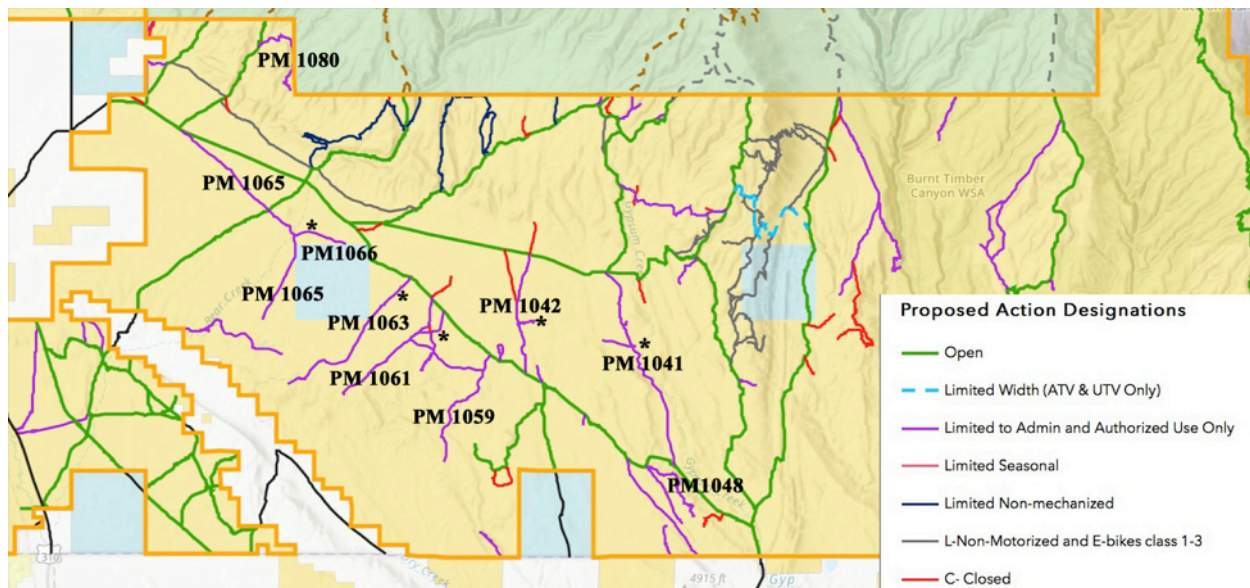
The many closely parallel and intersecting purple lines on the maps cause skepticism that every mapped route is needed. (See Map 3.) We argued that any administrative route segment without an identified purpose should be closed. The updated EA states: “BLM has designated routes for administrative and authorized use primarily based on the route's use for livestock operations and range improvements.” (EA page 2-8) This is inadequate to justify 63 miles of administrative roads.

### Map 3: Proposed Action: Administrative Routes (purple) in South Pryors.

(Detail from BLM's online ArcMap at <http://arcg.is/GyPr0>. Blue state sections indicate scale.)

(We have added route numbers for several administrative routes cited in Table 2.)

(\* Water tank(s) or pond)



The Administrative Routes Table<sup>17</sup> provides route ID numbers, mileages, and rationale for administrative designation. But the total mileage of proposed administrative routes in the table is 42.19 miles. This is 20.7 fewer miles than the 62.9 miles reported in the EA. If there are 20.7 more untabulated miles of administrative roads, where are they? Why is each needed?

The BLM table provides legitimate rationale for a number of administrative routes. But there are a number of questionable entries. Table 2 includes some examples.

**Table 2: A Sample of Proposed Administrative Routes from the Administrative Route Table**

The first three columns are copied from BLM’s Administrative Route Table. (Emphasis is added.)

We have added route number labels for these routes in Map 3 above.

<b>Route Name</b>	<b>Mileage</b>	<b>BLM Rationale</b>	<b>Pryors Coalition Observations<sup>1</sup></b> <i>Water tanks and ponds mentioned are indicated on Map 3 by *</i>
PM1041	3.5	This route accesses a water development and a range study plot.	The water tanks are 1.1 miles from Helt Rd. The other 1.8 miles to Gyp Springs Rd appears very little used. Only one access route is needed. The range study plot is probably near the water tank. There is no administrative need for the entire 2.9 mile connection between Helt an Gyp Springs Rds. The 0.4 mile spur to the west and 0.1 mile spur to the east are nearly invisible on GE. They do not access any water developments.
PM1042	1.7	This route accesses a water development and a range study plot.	The water tanks are actually on the 0.25 mile spur PM1043. The spur junction is 0.73 miles from Gyp Springs Rd., or 0.93 from Helt Rd. Only one access route is needed. There is no administrative need for the entire 1.7 mile connection between Helt an Gyp Springs Rds.
PM1048	1.2	This route follows the ridgeline.	Is there an administrative need to “follow the ridgeline”? The “Proposed Management” column in the BLM’s Administrative Route Table states, “Close and naturally reclaim the route.” Why is this route proposed for administrative use instead of closed?
PM1059	1.8	This route <i>might</i> access a water development, but it <i>might</i> not be functional.	It is hard to understand how the route is necessary for administrative use if BLM does not even know whether there is a water development, or whether it is functional. No water development is visible on GE. (Elsewhere water tanks are clearly visible on GE.)
PM1061	1.9	This route accesses a water development and a range study plot.	The water tank is 0.27 miles from Gyp Springs Rd. The study plot is probably nearby. The dead-end 1.6 miles past the tank appears very little used with no visible water development.
PM1080	1.3	This route <i>might</i> access a USFS fence line.	There is no USFS grazing allotment in the area. There is no sign of a BLM/USFS boundary fence on GE. If there is a fence, this route would provide access only to a short section of a long fence. (Elsewhere there are miles of USFS boundary far from any access road.)
PM1063	2.4	This route accesses a pond.	A rectangular 50’x35’ (dry) pond is 0.2 miles from Gyp Springs Rd. No other water development appears in the remaining 2.2 miles of increasingly faint track.
PM1065	3.2	This route accesses a water development.	A (dry) pond is actually on PM1066. It is accessed via Bear Canyon Road (South from Helt Rd.), PM1065 east 0.5 miles, then PM1066 0.25 miles to the pond. There is no apparent water development near the 1.2 miles of PM1065 south from the PM1066 junction, or the 1.6 miles west from Bear Canyon Rd. back to Helt Rd. Thus only 0.5 miles of PM1065 is needed to access the pond.

<sup>1</sup> Since the Administrative Route Table was unavailable until November 25, only 19 days (including Thanksgiving) before the comment deadline, our observations are via Google Earth (GE).

<sup>17</sup> The EA (page 2-8) mentions a Route Inventory Report available on the BLM ePlanning website. On November 16 we emailed BLM that the Report was not there, and asked where to find it. We were told they would get it up asap. It was posted on the ePlanning site on November 25 as Pryor TMP\_EA Administrative Routes.pdf.

The eight routes in Table 2 total 17.0 miles. But apparently only 2.8 miles, total, are needed to satisfy BLM's rationale for administrative designation. The other 14 miles may not be needed and should probably be closed. (Note: We have not examined all the routes in the Administrative Route Table, and 20 miles of proposed administrative routes are not in BLM's table.<sup>18</sup>)

Big Coulee<sup>19</sup> is another questionable administrative route. (It is not listed in BLM's Administrative Route Table.) This "road" wanders 4.69 miles into the Pryor Mountain WSA, yet appears from Google Earth to simply follow every bend of Big Coulee wash, and is not a "road" at all. It was not shown on any of the four alternatives in the 2015 RMP, nor was it in either the No Action or Proposed Action alternatives in the 2019 draft TMP. If BLM did not know about this route in 2015 and 2019, how can it be in the No Action alternative in 2020? What is the administrative need for this route?

During BLM's December 2 Virtual Public Meeting it was stated that the Big Coulee "road" accessed a water development in the WSA. It does not access Cottonwood Springs which is 0.6 miles up a north fork of the wash. But 1.2 miles up Big Coulee the route bypasses that fork and continues 3.5 miles up the wash in the WSA.

We continue to endorse the designation of administrative routes – when a specific need is identified. But when not needed they should be closed and decommissioned. Such routes are an "attractive nuisance" inviting illegal use. As the EA suggests, they can be disguised "to discourage continued OHV use." (EA page 2-13)

## **H. Public use of Administrative Routes**

We appreciate the following clear statements in BLM documents (emphasis added):

"Administrative routes would be managed for Non-Mechanized public uses." (Public Comment Response, page 97)

"The updated Proposed Action ... proposes that future public use of administrative routes be limited to non-mechanized means only" (Public Comment Response, page 307)

Regarding E-bike status on administrative routes the EA states: "Not Allowed (unless e-bike user has administrative and authorized access to the route)" (Table 3-14, EA page 3-24)

We assume this applies to the Water Canyon Trail despite conflicting language in the EA. (See section D. 2. Water Canyon Trail above.)

The following BLM statement needs clarification:

"Maps produced for public use will not include Administrative routes. Only specifically designated non-motorized and non-mechanized routes would be shown on the map and signed on the ground." (Public Comment Response, page 307)

We certainly agree that most Administrative routes should not be shown on maps for public use. But we think that in certain situations BLM policy should allow dual designation as Administrative and public Non-Mechanized. Any such routes should be on public maps. Water Canyon is an example. We continue to request the Demijohn Flat – Penney Peak Trail as another. (See section D. 6. above.) There could be others, now or in the future.

## **I. Summary**

1. The Proposed Action does not fulfill its stated purpose and need. BLM must meaningfully address the obvious inequity between mechanized (with and without motors) and non-mechanized recreational opportunities in the Pryors by increasing the miles of trails designated for traditional hikers and equestrians. The following are some easy additions which should be designated as wheel-free (non-mechanized) trails. (All of these have been proposed and described in our past comment letters. 12/3/2018 & 12/6/2019.):

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<sup>18</sup> More questionable administrative routes include the tangle of routes south of Gyp Springs Rd. near PM1061. They provide unneeded multiple routes to the same places. PM1062 is not in the BLM table, but seems to be redundant. No "structure" is visible on GE near PM1141. There is a pond near the middle of PM1060, but only one route to it is needed.

<sup>19</sup> BLM's online ArcMap identifies this route as PM1043. But the spur off of PM1042 is also identified as PM1043.

- a. Demijohn Flat - Penney Peak Trail
- b. Bent Springs Loop Trail (PM1132 & PM1134)
- c. Water Canyon Trail
- d. Lisbon-Dandy Loop Trail

Although these additions will help, they are insufficient to correct the inequity of the trails system. Further steps will be more challenging due to the history of nearly unrestrained motorized use of the Pryors, and the need for cooperation between the BLM and the USFS. But, despite the challenges, some redundant motorized routes should be converted to non-mechanized designation. For example: In the Proposed Action Graham Trail is converted from administrative to open designation – adding a new motorized route. Graham and Stockman Trails leave Gyp Springs only ½ mile apart and Bear Canyon Rd is nearby. One of these could be a non-mechanized route.

2. The data in the EA show that the Proposed Action increases the impact on soils, bighorn sheep, sage-grouse and cultural resources. A route-by-route analysis should be done to determine how best to minimize these impacts.
3. The proposed administrative roads need to be reviewed. Any roads (or segments of roads) without a demonstrable need should be closed and decommissioned.
4. Regardless of S.O. 3376, or any similar policies, BiFO planners must recognize that motorized e-bike use conflicts with recreational foot-travel (human or horse).
5. BLM must comply with the minimization criteria in President Nixon’s 1972 Executive Order 11644, and President Carter’s 1977 Executive Order 11989.

Thank you for carefully considering our comments.

Sincerely,

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