

December 3, 2018

Dave Lefevre
Assistant Field Manager
Billings Field Office
BLM

CC: Ken Coffin, Custer Gallatin National Forest Beartooth District Ranger,
Virginia Kelley, Custer Gallatin National Forest Planning Team Leader

Dear Mr. Lefevre,

We appreciate the time you have taken to meet with several of us on regarding travel planning in the Pryor Mountains. These mountains are very special to us and many others. We treasure the Pryors for the truly unique ecology and geology of this isolated island range: it really is a landscape like nowhere else. We represent a broad spectrum of interests including hiking, equestrian and mountain bike recreation, bird and wildflower watching, seeking solitude, camping, hunting scientific research and study. Many of us also drive the rough 4WD roads to access the landscape.

In recent years, public interest and appreciation of the Pryors Mountains have increased dramatically. More and more people are becoming aware of what a unique and valuable place it is – ecologically, culturally, geologically, scenically, recreationally and more. There is every reason to expect that this trend will continue in the future. Management of the Pryors needs to keep up with this changing and increasing public interest while preserving the landscape.

We promote a broad range of recreational opportunities in the Pryor Mountains. Opportunities for off-highway vehicle and ATV use in the Pryors currently vastly exceed opportunities for quiet recreation, both in quality and diversity. Specifically, we envision and propose a wide variety of quiet recreational opportunities including designated trails to accommodate hikers and equestrians with varying abilities and experience, access to a diversity of landscape types, and accessible in multiple seasons.

As a result of the long and complicated history of the Pryors, there are innumerable roads, tracks and trails created by and for motorized vehicles scaring the landscape. There are also relatively intact natural areas that are largely untouched by such use, and provide habitat for plant and animal species, and opportunities for quiet recreation and solitude. But at the present time, there are essentially no designated motor-free routes in either the BLM or Custer Gallatin National Forest (CGNF) managed areas of the Pryors.¹

Although the immediate consideration is the development of a Travel Plan for the BLM managed areas of the Pryors, we propose a unified vision of all the public land in the Pryors as an integral whole. The needed holistic management of the Pryors landscape will require coordination and collaboration between the BLM and Custer Gallatin National Forest (CGNF). We applaud the current collaboration to unify motorized road and route numbers across agency boundaries, and hope BLM and CGNF can extend this cooperation to developing a unified travel system including hiking and equestrian trails.

¹ The only exception is the approximately 1.6 mile FS trail from Tie Flat to the top of Big Pryor Mountain and Crater Ice Cave.

Objectives and Criteria for Motor-Free Route Designations:

We considered the following objectives and criteria in developing our proposal for motor-free routes in the Pryors. We hope that BLM (and CGNF) planners will share these objectives and criteria.

1. *Consistent with Travel Planning direction in the Billings Field Office Resource Management Plan, approved in 2015.* We believe our proposal satisfies this requirement and will help achieve BLM's goal to "manage these lands for a variety of sustainable visitor experiences in mostly primitive and natural landscapes."
2. *Preserve the natural and cultural values of the Pryors landscape.* Preserving and protecting the cultural values and sensitive ecology must take precedence over recreational access.
3. *Equitable balance of designated motor-free and motorized access and recreation opportunities.* We believe this is necessary to serve diverse public interests in the Pryors.
4. *A comprehensive system of designated, signed and publicized motor-free routes in a variety of landscapes.* Without designated, mapped and signed trails, activities like hiking and equestrian use are largely unavailable to less experienced people or those unfamiliar with the landscape. Quiet recreationists should be able to get maps and other information from BLM (and CGNF) about where they can find signed and marked trails to explore the Pryors. Such information is already available for motorized recreationists.
5. *Many motor-free routes accessible without 4WD.* Many people who would enjoy recreating in the Pryors do not have 4WD vehicles, but many access routes require high-clearance and 4WD. Equestrians need trailheads accessible with a horse trailer. Trailheads for most of our proposed trails are accessible with many highway vehicles.
6. *Motor-free routes for hiking and equestrian use, but not mountain bikes.* (i.e. no mechanized use.) Motor-free routes open to mountain bikes should be the exception rather than the rule in the Pryors. The numerous 4WD and ATV routes provide abundant opportunities for mountain bikes. Hikers and equestrians desire routes free from high-speed mechanized travel. Based on discussions with BLM personnel, it is likely many motor-free trails will be marked some way without constructed trail beds. Such routes are not appropriate for wheeled vehicles. Some of these routes will be in Wilderness Study Areas, BLM Lands with Wilderness Characteristics or into Forest Service areas that could be managed as Recommended Wilderness, all of which should exclude motorized and mechanized travel.
7. *Minimize pioneering of new routes for designation and use existing routes and tracks whenever possible to provide opportunities for quiet recreation.* There are a few routes, or segments of routes, where brush clearing and/or trail bed work may be appropriate, but most routes in this proposal follow existing, but abandoned, two-track routes. Signage will be necessary, both at the trailhead and along the way, but extensive trail work, including cutting new tread, will not be necessary. Where feasible, re-vegetation of abandoned two-tracks into single-track trails should be part of the any long-term commitment to the "primitive and natural landscapes" espoused in the RMP.
8. *Convert existing motorized routes to motor-free only as necessary to create a balanced motor-free system.* We did not find a way to provide sufficient diverse motor-free route designations without proposing the conversion of a few motorized roads into quiet trails. Areas with redundant motorized routes (i.e. two or more motorized trails in close proximity to each other, providing access to the same destination) provide opportunities for conversion to motor-free routes. We also note that converting routes from motorized to motor-free usually reduces management and maintenance needs, and reduce impacts on the landscape.

9. *Include both BLM and CGNF areas in a unified and comprehensive motor-free route system.*
Visitors to the Pryors and the resident flora and fauna do not see the landscape divided by agency boundaries.

Our Proposal:

We propose that the following routes on the BLM managed parts of the Pryors, and the extensions of some of them onto FS managed parts of the Pryors, be designated for quiet recreation, and specifically managed for hiking and equestrian use. These routes are described in detail below and depicted on the attached map.

We understand that some of these routes may need to be available for administrative motorized use. Many of these proposed trails cross the BLM/FS boundary will require cooperation with CGNF to designate, sign, and maintain.

We encourage discussion of alternative or additional options if BLM believes there are better options for quiet recreation routes.

Sykes Ridge (PM1006 & PM1009):

The PM1006 section of the proposed trail is a redundant ATV route roughly paralleling Sykes Ridge Road (PM1001). We propose converting it to motor-free designation. PM 1009 branches from Sykes Ridge Road and is closed to motorized use. PM1006 and 1009 would be connected by a 0.45 mile “dual purpose” (motorized and non-motorized) segment of PM1001. Our proposed five mile (one way) route begins from paved Highway 37 in the Bighorn Canyon National Recreation Area (BCNRA) on the eastern edge of the Pryors. From there it is about a mile cross-country to the beginning of PM1006. Eventually cooperation with the Park Service could lead to selection and signing of a preferred route, and signing of the trailhead.

This route would provide the only non-ATV access to the spectacular Sykes Ridge area including Sykes Cave and Sykes Arch. Sykes Ridge Rd, which used to be a moderate 4WD route has deteriorated such that it is nearly ATV-only.

Turkey Flat (PM1004):

This route was proposed as a quiet recreation, non-motorized trail in the Proposed Final RMP. We fully support this proposal by the BLM. This hiking and equestrian trail would provide a low elevation option with access from Wyoming Route #16, a good gravel road accessible by highway vehicles. Some vehicles could drive the 1.5 miles on Sykes Ridge Rd to where PM1004 branches off.

Demijohn/Penney Peak Area (PM1019, PM1021, PM1022 & PM1038?):

This is a great hike from Crooked Creek Rd to Penney Peak with an optional side trip to Crooked Creek and is accessible without 4WD. Both ends of this route are accessible from Crooked Creek Rd.: the north end near the Forest Service boundary, and the south end west of Penney Peak. Public motorized use should not be permitted within this culturally sensitive area designated as a Wilderness Study Area, an Area of Critical Environmental Concern, and a National Historic District.

Zigzag Trail/Lisbon-Dandy Mine Loop:

Here and elsewhere, we cannot identify BLM’s PM numbers for all the routes, but the route is clearly depicted on the attached map. This loop hike is accessible without 4WD from Crooked Creek Rd. It is an excellent fall and spring hike with 1,000 ft. elevation gain over the roughly five

mile trail. Hikers who have been there praise the views of East Pryor Mountain, Demijohn Flat and more.

Hiker's Haven Complex: Doug Fir, Big Sky, and Rocky Juniper Trails:

These three trails are increasingly popular with those who know about them. The trails all leave from various points along Horse Haven Road, and head north into the wild Bear Canyon and/or Red Pryor Mountain. These routes can all be hiked as out-and-back trails. Or the Big Sky and Rocky Juniper trails interconnect with each other and the Bear Canyon Creek trail (discussed below) for a more diverse experience as a loop hike. The Doug Fir trail can be connected with the Big Sky Ridge trail for a challenging, ten mile, 3000 ft. elevation gain, loop hike to the top of Red Pryor Mountain and back.

Currently all three trails are undesignated, and unmarked, but, with the exception of Rocky Juniper, make extensive use of existing abandoned two-tracks. The trails (again except Rocky Juniper) are relatively easy to follow, but to be reasonably accessible to less experienced hikers and those new to the area, trailhead signs and markers along the routes are needed. Specifically in the area where the Big Sky, Rocky Juniper and Bear Canyon Creek trails interconnect (on Forest Service land), signage directing hikers and equestrians to the other trails will be important for loop hikes. These signs or markers need not be obtrusive or degrading to the primitive experience, but will increase safety in this primitive setting.

Bear Canyon Area:

This includes the Pygmy Panther Trail, and ½ mile of Bear Canyon Creek Trail from the barricade north to the Forest Service boundary fence. Both trails continue north onto Forest Service managed land.

The Pygmy Panther Trail begins at the mouth of Bear Canyon and climbs the hill west of Bear Canyon and roughly parallels the canyon. It provides an enjoyable hike outside the canyon. Farther north one alternative drops back into the canyon on BLM, another continues north to intersect Bear Canyon Rd. (FS2492) on Forest Service land. It mostly follows old two-tracks not open to motorized use. We thank BLM personnel for recommending this route. We look forward to its designation as a hiking trail in the Bear Canyon area.

As discussed above, the Bear Canyon Creek trail can be linked with the Big Sky, and Rocky Juniper trails to create loop hikes. Signage or markers would be important to direct hikers and equestrians to the other trails.

Bear Canyon is an ecologically important and vulnerable area. It is unfortunate that PM1068 has become such an established vehicle route through the canyon bottom. In the past strong arguments have been given for converting the route to public motor-free use only. But we recognize that this is not a feasible action in the new Travel Plan. Instead we propose that BLM consider actions in the Travel Plan and/or other management decisions that might minimize vehicle traffic on the route. The idea is to allow vehicle access into the canyon, but reduce traffic through the canyon to elsewhere on Big Pryor. BLM (and CGNF) actions could encourage use of the alternative Stockman and Graham Trail routes instead. These routes provide easy access to all the FS routes to the north.

Inferno Canyon (PM1120):

This route provides redundant motorized access up the west slope of Big Pryor to Stockman Trail (FS #2850). There are three other motorized options up the west slope of Big Pryor, converting this route into a non-motorized trail will provide hiking and equestrian access on the west side of Big Pryor, and an excellent loop route with the Timber Canyon Trail (described below).

Water and Timber Canyons (PM1121 & PM1122):

We understand from conversations with BLM staff, that Water Canyon Road (PM1121) will be proposed closed to motorized access in the forthcoming environmental assessment. We wholeheartedly endorse this proposal and ask that it be designated as a non-motorized route.

Timber Canyon Road (PM1122) would provide a longer motor-free hike up a ridge and along the rim of Timber Canyon into higher elevation grasslands. This hike rewards with exceptional views into Timber Canyon, across the Pryors landscape, and of the Beartooths.

Water Canyon and Timber Canyon Trails can be linked to make a longer, more challenging and rewarding loop hike. This requires a scramble either up or down the north rim of Water Canyon, and an enjoyable traverse of the higher elevation grasslands

Timber Canyon can easily be extended beyond the disappearing two-track in the grassland to FS #2850 and back down Inferno Canyon Rd for an equestrian or hiking loop.

PM1132/PM1134:

These two routes link together for a great loop hike, with either entry point easily accessible by highway vehicles from Rail Bed Road/Pryor Gap Road. The hike gains more than 1,000 ft. of elevation; with stunning views of Sage Creek valley from the north rim of Big Pryor Mountain. A short walk along Rail Bed Road connects the loop, and provides stunning views of the Beartooth Mountains. The northern rim from PM1132 contains sensitive cultural sites that are best protected by limiting motorized use in the area. This loop is entirely on BLM managed land, requiring no coordination with the Forest Service for its designation and management.

Routes crossing BLM/Forest Service Boundary

Several of the routes above cross the BLM/Forest Service boundary (including the Doug Fir, Big Sky, Rocky Juniper, Bear Canyon, Inferno Canyon, Water Canyon and Timber Canyon Trails). It will be critical that the BLM and Forest Service continue to work together to make motor-free designation and management of these routes seamless across the boundary.

We hope that such interagency cooperation during the BLM Travel Planning process will lead to direction in the revised CGNF Forest Plan to encourage the designation of cross-boundary motor-free route designations. The CGNF Travel Plan for the Pryors could then be amended at the same time or soon after the Forest Plan is finalized as allowed by the FS 2012 Planning Rule.

Several of the routes above cross the BLM/Forest Service boundary (including Doug Fir, Big Sky, Rocky Juniper, Bear Canyon, Inferno Canyon, Water Canyon and Timber Canyon). The BLM managed lands along the western and southern edges of the Pryors provide the entry or access points for much of the Pryor Mountains. As such, it will be imperative that the BLM and Forest Service continue to work together to manage the landscape as a whole, making sure access and limits are consistent across those jurisdictional boundaries. While the extent of the Forest Service's responsibilities are beyond the scope of this letter, we look forward to conversations with the Forest Service regarding the coordination of its management documents with the BLM's travel plan, and to ensure holistic, integrated management of the Pryors for ecological and equitable recreational opportunities.

Implementation

We understand that this vision for the Pryors and the proposed quiet recreation trails will be a significant change from current management. We are cognizant of the time, effort, and labor (in terms of logistic paperwork and on-the-ground work, and cooperation with CGNF) it will take to make this vision a

reality. We hope to follow the travel planning process with continued discussions between the BLM and able groups to discuss opportunities for trail stewardship to sign and mark these trails.

Thank you for your consideration of these proposals.

Sincerely

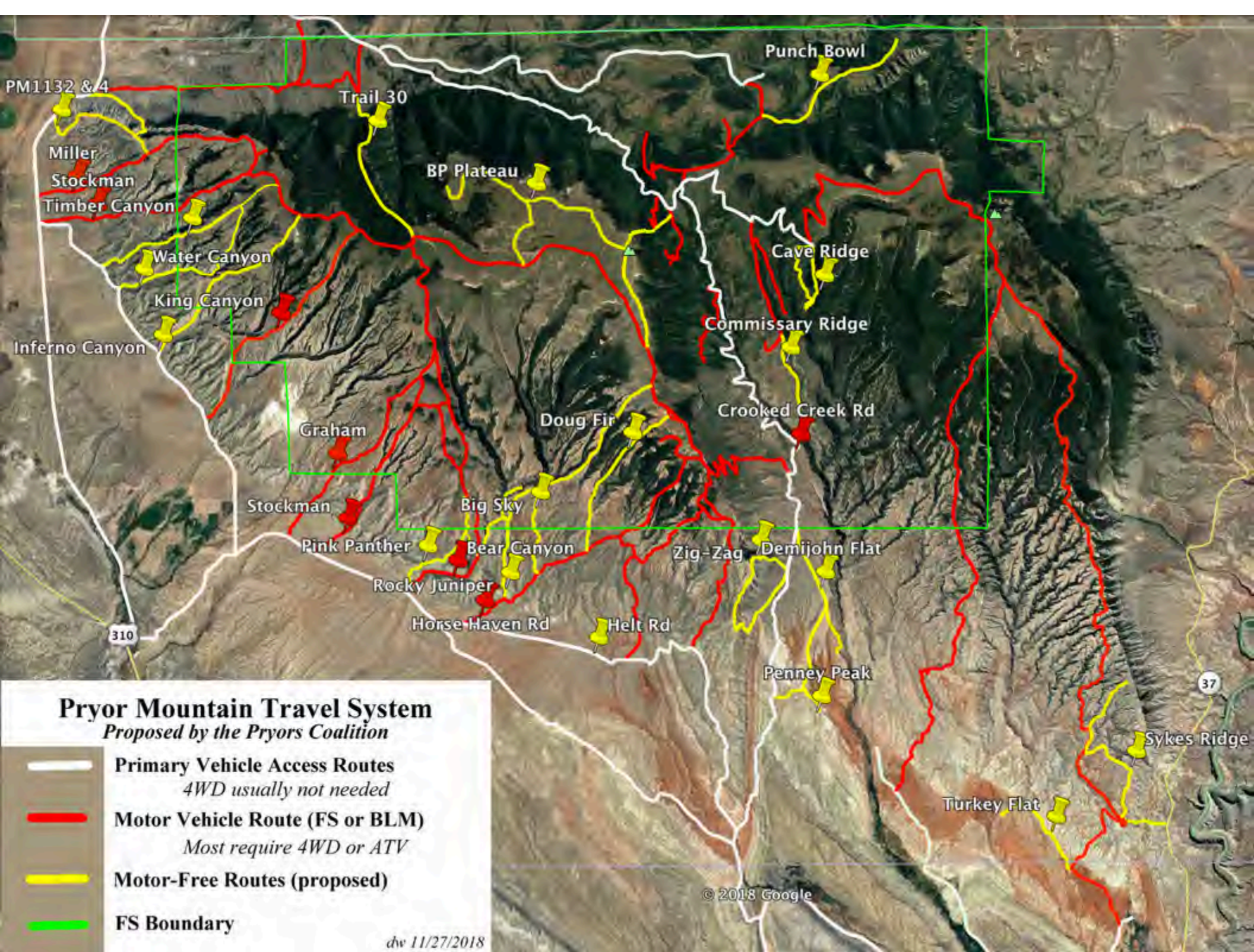
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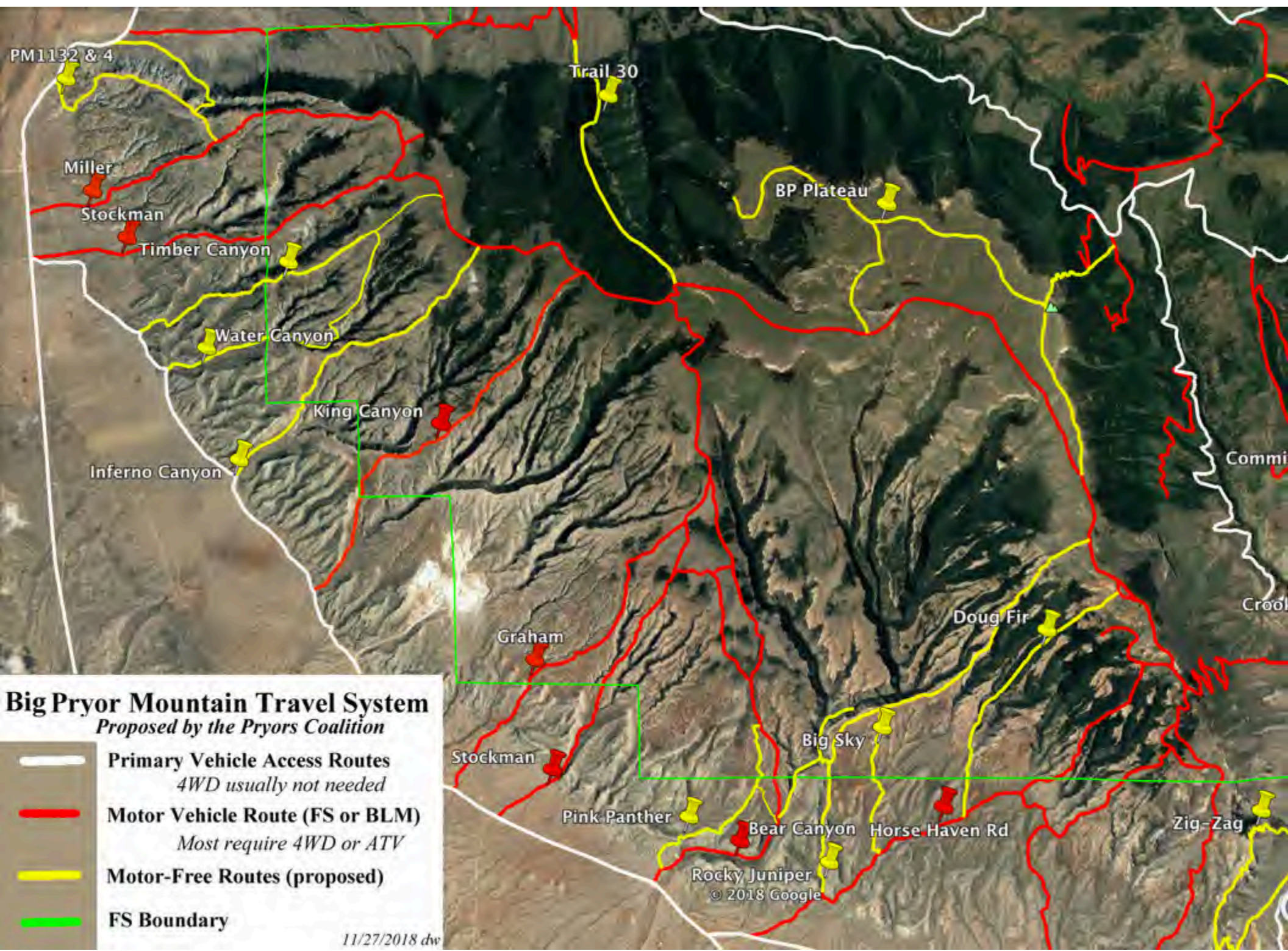
Pryor Mountain Travel System

Proposed by the Pryors Coalition

-  Primary Vehicle Access Routes
4WD usually not needed
-  Motor Vehicle Route (FS or BLM)
Most require 4WD or ATV
-  Motor-Free Routes (proposed)
-  FS Boundary

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