



Billings_PompeysPillar_RMP@blm.gov

June 26, 2013

Draft Billings and Pompeys Pillar National Monument RMP/EIS
Billings Field Office, Bureau of Land Management
RMP Team Lead, Carolyn Sherve-Bybee
5001 Southgate Drive
Billings, Montana 59101

Dear Carolyn Sherve- Bybee

Re: Billings and Pompeys Pillar National Monument Draft Resource Management Plan and Environmental Impact Statement

The Pryors Coalition is pleased to make comments on the Draft RMP/EIS. The Pryors Coalition (PC) consists of many individuals and several organizations interested in raising public awareness and appreciation of the unique Pryor Mountain landscape and preserving the ecological and cultural values and diverse recreational opportunities for future residents of Montana and Wyoming. Approximately one hundred supporters of the Coalition are named on our website (www.PryorMountains.org). Many more supporters have not chosen to publish their names publicly on the website. PC supporters have diverse interests in the Pryors but all want to protect the natural and cultural values of the landscape first and then provide balanced recreational opportunities within the limits the land can sustain. We believe that this requires an overarching vision of the future of the entire Pryor Mountain Landscape including BLM, CNF and BCNRA. Unfortunately we do not yet see any such vision by the managing agencies.

Our comments will be limited to the Pryor Mountain parts of the RMP (although some may also apply to other areas). In many ways we are pleased with the Bureau of Land Management's analysis and proposals in the Draft RMP/EIS. Although Alternative B is clearly a better choice, much of BLM's Preferred Alternative (D) is consistent with, and supportive of the Pryors Coalition's goals for the Pryors. Some of the discussion below will mention these points of approval, but the discussion will focus on issues where we believe improvements can be made to the Draft RMP.

Lands with Wilderness Character (LWC):

We are particularly pleased with BLM's identification of 10,766 acres in seven areas of the Pryors as LWCs. The Penney Peak Area (Burnt Timber Canyon Unit, Tract 2) is an area we have long wanted to protect. Tract 1 in the Pryor Mountain Unit is similarly important. Recognizing and identifying those areas in the Pryors which still have a wild character is the first and necessary step in preserving that wild character.

We believe that Pryor Mountain Unit, Tract 4 (455 acres) should also be designated as an LWC. It is currently a strange "island" entirely surrounded by two adjacent Wilderness Study Areas (WSAs). The only reason it is not already part of one or the other WSA, and the only reason it is not designated as an LWC in the RMP, is because two redundant motorized routes go on opposite sides of it. The fact that the area between the two routes is only 455 acres is strong evidence of the unnecessary redundancy of the two routes. One route should be retired so Tract 4 can be designated an LWC.

Areas of Critical Environmental Concern (ACEC):

Both the designation of the Pryors Foothills ACEC and the expansion of the East Pryor ACEC to include all of the Demijohn Flat National Register District are responsible actions designed to protect the unique natural and cultural resources of the Pryors. This is a top priority of the Pryors Coalition.

However we strongly suggest two improvements in these ACEC designations:

1. The Pryors Coalition endorses the Montana Native Plant Society's (MNPS) recommendation that the Pryor Foothills ACEC be expanded to the west to include sections 30 and 31. We greatly respect MNPS expertise and concern that this expansion is needed to help protect important and rare plant communities.
2. We do not approve of BLM's recommendation to remove area in the three WSAs from the East Pryor ACEC. WSA designation does not "provides adequate protection" (E-14, 33)¹ for these areas. WSAs and ACECs are established for very different reasons and managed with different objectives. We see no reason to "eliminate the overlapping designations" (E-14). These compatible "overlapping designations" serve an important purpose of identifying and protecting multiple resource values. The Nomination Evaluation for the East Pryor ACEC (E-12 to 14) clearly identifies an amazingly broad range of reasons for this ACEC that are not part of WSA designation and management.

Congress could at any time release the WSAs on East Pryor. Then the WSA surrogate for ACEC protection would vanish. We do not think the language that this area "would be managed as an ACEC" (2-169) is adequate. It should BE an ACEC. If Congress does release these WSAs will a whole new process be needed to recreate this ACEC if it is cancelled in the current RMP? Will BLM staff 5 or 10 years from now remember this phrase buried in the then old and dusty RMP?

The Alternative D map of the proposed East Pryor ACEC shows many fractured and scattered fragments. The most bizarre is a narrow road corridor along some six miles of Sykes Ridge road including only the disturbed roadbed itself. WHY? Why not just keep the WSAs in the ACEC? Wouldn't that simplify and improve management?

We note that the MNPS agrees, for botanical reasons, that it is inappropriate to remove the WSAs from the East Pryor ACEC. And they are not even considering the geological, cultural, and non-botanical ecological resources of the area listed in the Nomination Evaluation (E-12 to 14)

Mineral Material: In Alt A East Pryor ACEC is included in the list of areas "closed to mineral material disposals" but is not listed in Alt D (2-106). Similarly "mineral materials sales and permits" are "not allowed" in East Pryor ACEC in Alt A, but are allowed in Alt D (2-147). Surely it is not wise to relax the current protection of this very special area. (Is this a mistake in the RMP document?)

Withdrawal from Mineral Entry:

The Pryors Coalition is pleased to see many areas (ACECs, WSAs, and LWCs) recommended for withdrawal from mineral entry. We hope this withdrawal can be completed ASAP to protect the unique resources in these areas. This action will protect most of East Pryor Mountain and much of the arid lands to the south.

However we would like to see similar withdrawal from mineral entry in the BLM (and USFS) lands on Big Pryor Mountain. Big Pryor Mountain is just as significant as East Pryor Mountain in resources that need protection and in recreational opportunities that would be severely damaged by mining activity. The ecological, cultural, wilderness and recreational values of the entire Pryor Mountains are a huge asset for the people of Montana and Wyoming. In the two or three decades this RMP will be in effect the Pryors could either be a great benefit to the quality of life in the region or they could become a wasteland. It would not take much mining to severely damage the experience of visitors to the entire south and west slopes of Big Pryor Mountain.

The existing limestone quarry already significantly impacts the visitor experience and expansion would impact other historical, cultural, and natural values. Past uranium mining and exploration caused considerable damage to the Pryors. Is there any chance it could again in the future? Currently we are very concerned about the possibility of mining of fracking sand in the Bear Canyon area.

We ask that BLM withdraw all the land in the Pryors from mineral entry and work with Custer NF to do the same for adjacent Forest land. Failure to do so could be tragic.

¹ Notations like this refer to page numbers in the RMP.

Travel Management:

Travel Management is at the heart of any land management plan. It determines how and where people will actually go, and what they will do on the landscape.

Purpose, Needs, Goals and Objectives:

In the RMP the BLM clearly identifies various purposes, needs, goals and objectives of Special Recreation Management Areas (SMRAs) and Travel Management Areas (TMAs). Language used includes (emphasis added):

“Recreation use in the decision area continues to increase. With this popularity has come a demand for a greater variety and availability of recreation opportunities such as motorized and non-motorized trails (including equestrian trails), climbing, mountain biking, hiking, and camping. With the number of visitors growing, resource and user conflicts are becoming more common. Recreational use needs to be managed, including identifying special recreation management areas (SRMAs) where management attention is needed to highlight important recreational opportunities or deal with problems such as conflicts between users or impacts on other resources. The RMP should assist the BLM in providing access to the public lands and to ensure quality environmentally responsible outdoor recreational opportunities, experiences, and benefits for the growing number of public land users.” 1-13

“With the number of visitors growing, resource and user conflicts are becoming more common. Motorized use needs to be managed, including identifying areas to be restricted or closed for the protection of other resource values.” 1-13

“Minimize conflicts among OHV users and other uses of public lands.” 2-127

“In general, the Billings Field Office will manage access to balance public use, protect public land resources, promote safety for all public land users, and minimize conflicts among OHV users and other uses of public lands.” O-2

“The purpose of delineating TMAs is to provide more locale-specific travel management guidance to be considered during the route evaluation, designation and implementation. This process is designed to improve the BiFO’s ability to protect various resource values by minimizing impacts and provide a more balanced range of motorized and non-motorized opportunities throughout the planning area.” O-4

The Draft RMP does not provide a balance of motorized and non-motorized² opportunities:

Alternative D designates 130 miles of motorized routes and NO non-motorized routes. We have not found any discussion in the RMP where the thrust of the analysis is something balanced and symmetrical like: “Would particular routes be most valuable as a motorized or as non-motorized routes?” Instead the tone is “Is there any reason routes should not be motorized?” The presumption seems to be that routes should be motorized unless a reason is found for them not to be. And there is no indication that “to provide a non-motorized route” was ever considered as such a reason.

In the Recreation and Visitor Services section of Appendix O (O-156 to 169) non-motorized activities like hiking, biking and equestrian are mentioned (barely) in the first paragraph – but never again. It is true as claimed (O-156) that people interested in non-motorized activities also use roads, but only as access for other “Visitor Services.” The motorized routes are not the objective.

Different types of motorized routes (“comfortable, low risk” or “challenging, high risk driving experiences”) are discussed in some detail, but non-motorized routes are not mentioned, let alone different types of non-motorized routes. Non-motorized users should be provided a variety of options, including different trail lengths and levels (easy, moderate, strenuous).

² In general whenever we use the term “non-motorized” we are referring to hiking, equestrian, and mountain bike use. There may be some situations where certain of these activities are not appropriate such as mountain bikes in WSAs.

There is much discussion in the RMP (Appendix O) of “*routes... associated with... Specific Recreation Activities.*” These only include “*hunting, archery hunting, vehicle exploring, viewing wild horses, and viewing wildlife.*” While some PC supporters do participate in these activities the list is a very incomplete representation of the “visitor services” the public seeks in the Pryors. Two of the five categories are hunting. (Some Pryors visitors hunt, most do not.) “Vehicle Exploring” is apparently about four-wheeling or ATV cruising. “Viewing wild horses” is a narrow category. The only remaining category, “wildlife viewing” does not begin to cover the public interest in the Pryors. What about routes “associated with” foot or equestrian “exploring”? Or motorized routes for access to hiking routes? People are looking for scenery, wildflowers, birds, photography, solitude, relaxation, scientific study etc.

PC supporters do in fact travel to the Pryors in motor vehicles, but the vehicle is not the point; it is only used to get there.

The need for designated non-motorized routes:

The BLM and USFS provide maps to the public showing some 250 miles of designated and signed motorized routes all over the Pryors. No such maps (or other information) are provided by BLM (or USFS) for non-motorized routes. We have people ask us where they can hike in the Pryors. It is difficult to tell them due to the lack of designated and signed non-motorized routes. The Pryors Coalition has begun to try to fill this void by posting hiking guides on our website which has received more than 10,000 visits in the last year. The Montana Wilderness Association Eastern Wildlands Chapter has led multiple well-attended hikes on these as-yet-unofficial trails. The hiking guides (most of which have been posted less than a year) are some of the more popular pages with hundreds of visits per page. Our effort is made more difficult by the absence of designated routes and trail signs.

Many, and increasing numbers, of people want non-motorized recreation opportunities in the Pryors such as, but not limited to, hiking. They want places to get away from motorized commotion. They don't want to have to look for fragments between the over-abundant motorized routes. Some want and are able to travel through rough terrain without designated routes. But many want to be able to pick up a map or guidebook that directs them to designated, signed and marked quiet trails into interesting places.³ This is especially true of visitors from other states or more distant parts of Montana.

Build it and they will come: The USFS actively promotes motorized use in the Pryors by widely distributing Motor Vehicle Use Maps. Will BLM do the same after the ROD on this RMP? The Pryors Coalition is attempting (with limited resources) to do the BLM and FS's job of providing service to the public and information on non-motorized recreational opportunities. We hope BLM (and CNF) will soon help. When designated, signed routes and public information are readily available many more, low-impact, non-motorized visitors are likely to come to the Pryors. We must not forget that this RMP is not a plan for today's circumstances. This plan will be in effect for 20 or 30 years, and its precedents will last even longer.

Another important aspect of the public interest in non-motorized activity in the Pryors is that many people do not have rugged 4WD rigs. They want trailheads accessible with more standard, moderate clearance vehicles. This also applies to some people with 4WD vehicles. They often want to hike, not drive long and rough roads to the beginning of a hike. This does not require improving roads. It requires designating trails accessible from existing better roads.

ATVers and other motorized recreationists frequently ask for loop opportunities. This is a surrogate argument for keeping all redundant routes open. It needs to be noted that hikers also like loop routes. But first we need designated routes. There are currently an abundance of loops, figure eight, and pretzel routes for ATVs and four-wheeling. If BLM is serious about “*provid[ing] a more balanced range of motorized and non-motorized opportunities*” (O-4) it would be a good start to designate some of these routes for non-motorized use.

³ The statement that people can walk anywhere does not meet this public need. Most people want designated, signed and publicized hiking routes like those provided for motorized recreationists. This is especially important for families with small children, less experienced hikers, and visitors from outside of the immediate area who cannot be reasonably expected to find their own trails. Moreover, the existence of designated trails allows for better resource protection. Mountain bikers and equestrians should usually travel on trails.

Equestrians, including the Beartooth Back Country Horsemen, have legitimate safety concerns with mixing horses and bicycles. As the number of recreation visits to the Pryors continues to increase there may be a need for non-motorized routes closed to mountain bikes. Meeting these diverse public needs will require more than just a few token non-motorized routes. However, many of the abundant motorized routes are more suitable for mountain bike use than they are for hikers and equestrians.

Nothing in this RMP addresses the need for designated non-motorized routes in the Pryors.

Conflict of Uses:

According to the Department of the Interior:

"It appears that most nonmotorized forms of outdoor recreation are disrupted or diminished in value by the operation of ORVs nearby. This is especially true for those visitors whose recreation goals include solitude, tranquility, relaxation, observation of wildlife, and appreciation of wildland environments. Where a significant level of ORV use is present, tranquility-seeking recreationists are often displaced altogether." (emphasis added.)

This statement is from U.S. Dep't of the Interior, Heritage Conservation and Recreation Service, Final Environmental Statement: Departmental Implementation of Executive Order 11,644, 30–31 (1978). As quoted in John C. Adams & Stephen F. McCool, *Finite Recreation Opportunities: The Forest Service, the Bureau of Land Management, and Off-Road Vehicle Management*, in *Natural Resources Journal*, Vol. 49, Winter 2009, page 52.

This is the "use conflict" that Executive Order 11644 charges the BLM to minimize with its Travel Management Planning. The solution is to designate separate, quality routes for non-motorized recreationists.

Designation of Non-Motorized Trails Later is Unacceptable:

According to the RMP,

"Non-motorized recreational trails would be considered during the development of SRMA management plans and travel management." 2-128 and O-3

"Special recreation management areas (SRMAs) management plans would be initiated within 5 years." and

"Construction and maintenance of non-motorized recreational trails would be considered during the development of SRMA management plans." 2-122

A single ½ mile non-motorized route is designated in Bear Canyon in Alt B (Map 144). No other alternative (including the preferred alternative) designates any non-motorized trails. The above quotations from the RMP suggest that non-motorized trails may be designated sometime in the future. This postponement is not acceptable.

Our concern is with the failure to designate any non-motorized routes. (We are not particularly concerned about "construction and maintenance" of non-motorized routes at this time.) Alt D designates 130 miles of public motorized routes in the Pryors TMA and designates NO non-motorized routes. The management plan needs to identify and designate both motorized and non-motorized routes at the same time in a balanced plan to provide an appropriate range of recreational opportunities and to minimize use conflicts. Postponing non-motorized designations until later will not work if all the prime routes are already designated in the RMP for motorized use. The designation of certain tracks for motorized use precludes their designation as non-motorized routes later. Motorized routes should not get "first choice" with non-motorized routes to be designated later from the "leftovers."

Recommendations for Some Specific Routes in the Pryors

Bear Canyon Road (BLM route 1014 on signs on the ground. PM1068, PM1069 and PM1070 in the route inventory.⁴)

We raise three major issues regarding Bear Canyon Rd:

⁴ Most routes are not identified with names or numbers in the RMP on the TMA maps or in the text. The key map for the route inventory sheets on the BLM website at: http://www.blm.gov/mt/st/en/fo/billings_field_office/rmp/drmp/travel_management/pryors.html is incomplete. 54 of the 144 inventoried route segments do not have route number labels on the map. Due to the high density of routes mapped it is often unclear just which route on the map a route number label applies to. Therefore we may not always have the correct route ID number. The descriptions should resolve any resulting ambiguity.

A. The north end ½ mile of Bear Canyon “road” (In north ½ of section 3, PM1070)

This section in the bottom of the canyon was washed out by a flood in spring 2011. It is currently signed closed to motorized use and barricaded. This is the only designated non-motorized route in any alternative (Alt B, map 144). In Alt D this section is designated open to motorized use (map 146).

Several reasons why this route should be designated for non-motorized use only.

1. This route is in a sensitive and rare (in the Pryors) riparian area. Bear Canyon is one of the few canyons on the south side of the Pryors that has intermittent to perennial water available for wildlife. It is also part of a National Audubon Society-designated Important Bird Area. Motorized use would significantly disturb birds and other wildlife using and dependent on the area.
2. This area is infested with invasive weeds. Efforts to manage those weeds are beginning. Motorized use will seriously handicap this effort. Also motor vehicles making a quick 1 mile round trip tour into this canyon before going on up the Bear Canyon Ridge Rd (PM1069) would collect weed seeds to distribute throughout the rest of Big Pryor Mountain.
3. This route is part of an increasingly popular hiking route for people who wish to escape motorized commotion. It has been used several times already in 2013 by MWA hiking groups. The presence of new cairns marking the descent into Bear Canyon indicate additional use by other hikers.
4. This is a dead end route for motorized use. The old (and illegal) track on north into Custer NF is closed to motorized use.

B. Campsite Development in Bear Canyon

We have heard rumors of proposals to develop a campsite about a mile or so into Bear Canyon although there is nothing specific about this in the RMP. Such development presumably would be done in the implementation-level planning stage for the SRMA:

“Evaluate the need for future developed camping locations in SRMA plans, based on select criteria such as habitat, resources, cultural, and socio-economic needs.” 2-121

We want to take this opportunity to oppose such a development and give several reasons why this campsite should not be developed.

1. A developed campsite would greatly increase motorized traffic in the canyon. There is already a heavily used informal camp area at the canyon mouth ½ mile from Helt Rd. A second developed campsite would significantly increase motor vehicle traffic back and forth through the canyon. Perhaps within the canyon and IBA dispersed camping should be permitted only for small groups (<6 people?). (If motor vehicle camps are permitted at all, maybe only a couple small vehicles should be allowed at dispersed camps.) *“Ecologically sensitive areas or other areas restricted to motorized use would be closed to dispersed camping if resource damage is found to be occurring in these areas.”* 2-128
2. The 1 ½ mile from the canyon mouth is part of an increasingly popular hiking route up the bottom of Bear Canyon. This 1 ½ miles is shared between motor vehicles and walkers. Increased motor vehicle traffic will make this section an unpleasant hike. Many hikers do not have a 4WD vehicle and walking is their only option. For others walking is the preferred option. Bear Canyon provides one of few opportunities to begin a hike at a “trailhead” easily accessed by a typical passenger car.
3. The entire route from the canyon mouth (PM 1068) and up the hill (PM 1069) and on into Custer NF is through a National Audubon Society Important Bird Area. This is about 2 miles on BLM land. Increased traffic will negatively impact both birds and bird watchers.

Bear Canyon IBA: “Ornithological Summary”

“Bear Canyon supports breeding populations of more than a dozen species on the Montana Priority Bird Species List. It also has the highest known number of nesting Blue-gray Gnatcatchers among the handful of foothill canyons in the area that constitute the entire range of the species in Montana. The riparian corridor is home to a rich diversity of Neotropical migrants, and the adjacent uplands are inhabited by Common Poorwills, Loggerhead Shrikes, Sage Thrashers, Green-tailed Towhees, Pinyon Jays, and the occasional broods of Greater Sage-Grouse.” <http://netapp.audubon.org/iba/Site/2939>

Additionally, Bear Canyon has in recent years been a nesting site for peregrine falcons.

4. A “Conservation Issue” noted by Montana Audubon in the Bear canyon IBA site profile is that *“offroad vehicles have resulted in increased erosion of the slopes adjacent to the canyon bottom.”* Increased traffic would certainly exacerbate this problem.

5. A developed campsite a mile or so into Bear Canyon would likely produce pressure to improve the road to the campsite which would increase traffic even more. Soon Bear Canyon would be primarily a motorized travel corridor rather than the special place (ornithologically, botanically, culturally....) that attracted people in the first place.
6. See point C. 6. Below.

C. Bear Canyon Non-Motorized Trail

Currently (Alt A) there are two motor-legal BLM routes from Helt Rd up the southwest slope of Big Pryor Mountain between the limestone quarry and Bear Canyon - Stockman Trail and Bear Canyon. A third route, Graham Trail, is proposed to be opened to motorized use in the Preferred Alternative. Graham Trail is not currently motor legal although people drive it anyway. It is only 3 miles along Helt Rd from Graham Trail to Bear Canyon Rd.

If BLM is serious about “*provid[ing] a more balanced range of motorized and non-motorized opportunities throughout the planning area*” (O-4) then BLM needs to designate some non-motorized routes even if that means not designating, or closing, some motorized routes. This area would be a good place to begin. Instead of adding a third redundant motorized route going to the same place (They all join on Custer NF), one of these three routes should be designated for non-motorized use only.

Although Graham Trail might be designated for non-motorized use only, we suggest the non-motorized route be Bear Canyon (PM1068) beginning at the canyon mouth ½ mile from Helt Rd for a number of reasons.

1. It is an ecologically sensitive area and a National Audubon Society IBA, (See above)
2. It is part of an increasingly popular hiking trail.
3. Bear Canyon is the roughest of the three routes for motorized access.
4. Although the route does connect with a motorized route on Custer NF, that CNF route is easily motor accessible from Stockman Trail.
5. Equestrians, including the Beartooth Back Country Horsemen, are very concerned about safety issues related to mixing horses with motorcycles and ATVs. This would provide separate staging areas and trails for motorized use and horses.
6. The inventory sheet for this route (PM1068) identifies many “special resource” concerns with regard to this route including birds, plants, soils, and archeological sites.
The inventory sheet claims “*Mitigation will be achieved by employing adaptive management monitoring of the status and/or integrity of the potentially impacted sensitive resources or resource issues identified above as they relate to various factors (e.g. climate cycles, exotic species introduction, visitor use levels [type, intensity, season of use]).*” This vacuous bureaucratese does not identify any specific action that can or will be taken to mitigate impacts of motorized use on the identified resources.
7. The closure of PM1071 to public motorized use would do a lot to minimize impacts to Bear Canyon’s special resources and make it a better place for hikers and equestrians. There would be public access to Bear Canyon rather than a motorized thoroughfare through Bear Canyon to the rest of Big Pryor Mountain. (Stockman Trail and perhaps Graham Trail would serve that purpose.)
8. The Route Inventory Sheet for PM 1068 includes the question: “*Can the ... uses of this route be adequately met by another route that minimizes impacts to the sensitive resources identified above ...?*” BLM answers “*No.*” We think the correct answer is obviously “*Yes*” because Stockman Trail goes to the same place. The only motorized use of this route that can’t be met by Stockman Trail is motorized use of this route. (This would be true of any route.)
More importantly if non-motorized activity is considered equally with motorized activity, and if a “public use of this route” in the question above is considered to be its use as a hiking/equestrian trail, then that use can not “be adequately met by another route” because Stockman Trail is a motorized route. Thus the public use is best served by closing the route to motorized use.

Designating most of PM1068 beyond the mouth of the canyon a non motorized route would demonstrate a real commitment toward achieving the stated goal of a balance between non-motorized and motorized use. The optimum endpoint of the motorized access to Bear Canyon would need to be determined. The rest of PM1068 in the canyon bottom might be designated for administrative use but not past the existing barricade and not up the hill (Routes PM1069 and PM1070).

Big Sky Trail (See map.)

The BLM inventory number for this route is PM 1034. It runs N-S through the center of section 2, T9S R26E from Horse Haven Rd to the Custer NF boundary fence.

This 1 mile route is designated open to motorized use in Alt D. It is currently signed closed to motor vehicles and there is a barricade across the entrance from Horse Haven Rd.

This route should be closed to motorized use and designated as a non-motorized route because:

1. It is the beginning of an increasingly popular hiking route informally called the “Big Sky Trail.” The trailhead is near a good gravel road (Helt Rd) and is accessible without 4WD. Although a moderately high clearance vehicle is desirable for the 1.8 mile distance on Horse Haven Rd, someone with only a highway vehicle could park near Helt Rd and still access the trail with a 1 ½ mile extra walk on Horse Haven Rd.
2. People do not want to, and should not have to walk a mile on route PM1034 before escaping motorized commotion and impacts.
3. There is no particular purpose for this to be a motorized route. It dead ends at the CNF boundary. None of the old tracks north of the fence on Custer NF are legal for either public or administrative motorized use. CNF has a “no motor vehicles” sign at the fence and the gate is locked.
4. If motor legal, this route would be an “attractive nuisance” tempting people to illegally drive further on BLM or on north into CNF where extensive illegal driving is possible. Having this route open to motorized use would cause an enforcement problem. How often will the scarce BLM and CNF law enforcement people make the 2 mile round trip in to the fence to check for violations? The fence was cut fall 2012. The cut fence was neither discovered nor repaired by BLM or CNF. Appropriate closure to motorized use at Horse Haven Rd means any vehicle tracks from that point indicate illegal activity, and would thus be a great aid in simple, efficient enforcement of ORV use regulation.
5. According to the BLM Inventory Sheet for this route it is a “connector” route and provides property access to the Forest Service. But the 2008 CNF TMP does not designate the tracks north of the fence (on CNF) for either a public or administrative motorized use. So PM1034 does not “connect” to any other motorized route, public or administrative.
6. There are a number of “Special Resource” issues identified in the Inventory Sheet related to this route.
7. The inventory Sheet answers “No” to the question, “*Can ... uses of this route be adequately met by another route that minimizes impacts....?*” This question presumes motorized use. Since it is a dead end motorized route the answer should be “There aren’t many motorized uses of the route.” However the non-motorized use of this route can be better met by closing it to motorized use.

Hikers need to climb over or through the barbed wire fence at the BLM/CNF boundary. It would be good to install a passage suitable for hikers that would not allow passage by 4WDs and ATVs. Other hiking routes need similar passages. Equestrians are blocked entirely by the locked gate. (Tracks indicate equestrian use of this and nearby routes.) This would be a good place to install a variation of the “Simmons” gate installed in the Grove Creek area to permit equestrian passage but not 4WDs and ATVs. In this case it could be smaller and simpler because there is no need for even administrative vehicles to pass through.

RMP map 146 indicates another roughly parallel route just east of PM1034 making a loop with PM1034. This loop is proposed open to motorized use in Alt D. But this route is mostly rehabilitated naturally and is nearly invisible on the ground. (Did BLM field check this route?) This route should be declared non-existent and removed from BLM maps.

Doug Fir Trail (See map.)

This is the informal name for a hiking route north from Horse Haven Rd in section 1. It goes north about ½ mile from Horse Haven Rd to the boundary fence then continues onto Custer NF. This ½ mile route is designated for administrative use in Alt D. We question whether there is any administrative need for this route since the tracks on into CNF are not designated for either public or administrative use. However this route should be designated as a non-motorized route. A passage through the fence for hikers should be constructed.

Redundant Routes connecting Horse Haven, Bear Canyon, Stockman, and Graham Rds parallel to Helt Rd.
(PM1076, PM1077, PM1082 ?)

This approximately 4 mile route (three segments connected end to end) is proposed to be open for public motorized use in BLM's preferred alternative (D). It is not motor legal in Alt A and is currently signed "closed." It is also closed in Alt B. The entire route should remain closed to motorized use.

1. This is a classic example of unneeded parallel routes. For most of its length it is less than ½ mile north of, and in sight of Helt Rd. It follows the base of Big Pryor Mountain at the edge of the flat.
2. The eastern 1 ½ (approx.) mile between Bear Canyon and Horse Haven Rd (PM1076), provides a loop hiking route connecting the Bear Canyon and the Rocky Juniper Trails. (This 6 mile loop includes about 1 ½ mile of motor legal route in Bear Canyon and a short section of Horse Haven Rd., but with this newly proposed motorized route the 6 mile hiking loop would include 3.3 miles of motorized route.)
3. There is no need for the slight shortcuts these route segments provide for motor vehicles between Horse Haven, Bear Canyon, Stockman, and Graham. Helt Rd provides the needed access.
4. The claim in BLM's Route Inventory Sheets that these routes are not redundant because they have public (motorized) uses that can't adequately be met by other routes is simply false. However the non-motorized public use of especially PM1076 can not be met by another route.

Demijohn Flat

Route PM 1019 (SE from Crooked Creek Rd just south of BLM/CNF boundary.)

This route is designated open in Alt D, but should be closed to public motorized use and designated for public non-motorized use. (It could still be an administrative route as in Alt B.)

1. This route encourages public motorized access to a culturally sensitive area designated as a National Register District and an ACEC. The preferred alternative proposes expanding the ACEC to include all of the Demijohn Flat National Register District. (E-14) That is a compelling reason to make the route non-motorized.
2. To the NE of this route is the Burnt Timber Canyon WSA. To the SW of this route is a proposed LWC. This route forms the boundary of both. There is no good reason for this motorized corridor. Closing this route to motorized use would allow a 1 ½ mile common boundary between the WSA and LWC greatly strengthening both.
3. This dead end route provides an "attractive nuisance" tempting people to drive beyond the designated end. Monitoring and enforcement will require regular 3 mile round trip excursions from Crooked Creek Rd by BLM LEOs. This is unlikely to happen often due to staff limitations. Efficient, effective monitoring and enforcement would be much easier if PM1019 was designated non-motorized from the junction with Crooked Creek Rd.
4. This route could provide an easy hiking opportunity from Crooked Creek Rd, with a trailhead accessible without 4WD vehicles. Most people can walk. We have seen people in the Pryors park their UTV and go for a hike; it is likely that many riders, as with automobile drivers, would take advantage of the opportunity to complement their ride with a chance to stretch their legs. It is no more logical to assume that ORV users are incapable of walking than it is to assume that people in cars cannot do so. Many people like to walk and visit the Pryors specifically to hike – especially away from motor vehicles; the cultural and archeological values of the Demijohn Flats area are clearly enhanced by the opportunity to experience and contemplate them free from the distraction of vehicle noise and dust. Longer hikes south into the Burnt Timber Canyon LWC (Penney Peak area) are also possible beginning on this route.

Two tracks extend south from the "Y" at the end of PM1019 in section 10.

Route PM1022 goes about a mile SE. This route may need to be designated for administrative use only as in Alt D.

Route PM 1021 and PM 1038 (?) wanders about 4 miles SW and S into the LWC. This route should be closed to all motorized use and designated as a non-motorized route.

After about 1 mile this route is very badly eroded and not passable with motor vehicles. It should not be driven. It makes a good hike into the LWC and to Penney Peak.

Sykes Ridge

Route PM1006 and part of PM1001. (Mostly in sections 27 & 28 T9S R28E)

PM 1006 is a 2 mile route from PM 1001 and back. The two routes are redundant. One route should be closed. We recommend closing PM 1006 and designating it as a non-motorized trail. The 445 acres inside the loop should be designated and managed as an LWC.

1. Since the two routes are redundant closing one will not inhibit motor vehicle traffic up and down Sykes Ridge.
2. This would reduce the many resource concerns identified on the Route Inventory Sheet.
3. The 445-acre island between the routes, excluded from WSA status could become an LWC.
4. The Route Inventory Sheet identifies hiking as a “primary” use of route PM 1006. Access to this hiking route is not difficult for people without a 4WD. It is about a 1-mile cross country hike from paved Highway 37 in BCNRA to this route. Constructing a connecting trail might be considered in the future.
5. The Route Inventory Sheet for PM 1006 claims the route is not “redundant” and that its uses cannot be met by another route. But the use of driving up Sykes Ridge can be met by PM 1001. One identified primary use of hiking can be better met if PM 1006 is designated as a non-motorized route.

Lisbon - Dandy Mine Loop

This is an opportunity to designate a non-motorized loop route. (We can’t determine all the BLM route inventory numbers from the BLM map. The loop includes routes PM 1023 and PM 1024. The loop is mostly in sections 4 & 9 T9S R27E. (See map.)

The route (PM 1023) in section 9 from Crooked Creek Rd up to the Dandy Mine and Red Pryor Mountain Rd is designated open for motor vehicles in Alt D. This route should be designated for non-motorized use only.

The rest of the loop including the switchback route, mostly in section 4, from Crooked Creek Rd up to the Lisbon Mine is closed in Alt D. This entire loop should be designated for non-motorized use only.

Some Reasons:

1. There are an abundance of motorized routes for access to the Pryors, but a scarcity of non-motorized routes.
2. There are four other motorized routes up Red Pryor Mountain. Besides Red Pryor Mountain Rd itself, there is the switchback road from Crooked Creek Rd on Custer NF about 1 ½ mile to the north of this loop, and two routes up from Horse Haven Rd to the west. These contribute to the many loop routes available for motorists.
3. The trailhead for this hiking loop is accessible without a 4WD vehicle. Yet the hike provides outstanding views of Demijohn Flat, Crooked Creek Canyon and the East Pryor Mountain block.

Overview of motorized and non-motorized designations

The following table compares designations of motorized and non-motorized routes in Alternatives A (current and no-action), Alt D (BLM Preferred) and the Pryors Coalition proposal. Data is from TMA maps 143 and 146 in the RMP. Numbers in the Pryors Coalition proposal are based on all the non-motorized routes suggested above in this letter.

	Alt A (current situation)	Alt D (BLM preferred)	Pryors Coalition Proposal
Designated non-motorized routes	0 miles	0 miles	18 miles*
Designated motorized routes	119 miles	130 miles	118 miles

*12 miles from proposed motorized, 6 miles from proposed administrative or closed in Alt D

Obviously our suggestions are very modest and come nowhere close to a balance between motorized and non-motorized routes.⁵ A few more non-motorized routes might be designated later in implementation-stage planning from administrative only and closed routes. But since most recreationally desirable routes are already designated and included in the table above, that will not greatly improve the imbalance.

⁵ This is particularly true since the Custer NF Travel Plan for the Pryors includes 124 miles of designated motorized routes and only a single 1.6 mile designated non-motorized route.

Route Inventory Sheets:

Our comments in this section refer to the “Background and Supporting Material for Travel Management” found on the BLM website at http://www.blm.gov/mt/st/en/fo/billings_field_office/rmp.html. Specifically we refer to the Pryor Mountain TMA map and the Route Inventory Sheets for specific routes in the Pryors TMA.

These inventory sheets overwhelmingly emphasize consideration of motorized use, with only rare hints at non-motorized use. This imbalance is implicit in the form itself rather than in a faulty application of the form. Since this analysis was done nearly four years ago (2009) it may have appropriately implemented the policy direction at that time. But at this time (2013) it provides an imbalanced database for decisions. We note that there is no similar inventory considering designations of routes for non-motorized use.

The categories and questions on the form clearly imply consideration of routes for motor vehicle use. Although the section on “Special Resources” (green block) is relevant to any kind of use, and the section on “Public Uses” (blue block) occasionally mentions non-motorized uses, these sections are all aimed at the final recommendation of whether the route should be designated as open or closed to motorized use. There is no place on the form to designate a route for non-motorized use only.

The section on “Avoidance, Minimization or Mitigation of Impacts” (light green block) asks: “*Can the impacts to the above sensitive resources be avoided, minimized, or mitigated?*” Presumably this refers to the impacts of motorized use since the endpoint of the analysis is a recommendation of whether motorized use should be permitted.

Interestingly the answer is “Yes” on every one of the 144 Route Inventories in the Pryor Mountain TMA! Presumably a lot of impacts can be minimized or mitigated given sufficient staff time and budget. But will BLM have the required resources? In any case this question was apparently of no help in identifying which routes were more, or less, problematic with respect to minimization or mitigation of impacts to special resources.

We also note that we have not found on the forms we have examined carefully any indication of any specific actions which might be taken to minimize or mitigate impacts of motorized use.

The section on “Route Redundancy” (orange block) asks: “*Can the commercial, private-property or public uses of this route be adequately met by another route that minimizes impacts to the sensitive resources identified above or that minimizes cumulative effects on various other resources?*” Again this presumably refers to motorized uses since the endpoint of the analysis is a recommendation of whether motorized use should be permitted.

143 of the 144 route inventories claim, “No” the route is not redundant! (The only exceptions is the 0.25 mile PM 1064.) This enormously stretches credibility given the “spaghetti” of routes shown on the key map. (Note that there are so many routes the key map only shows PM numbers for 90 of the 144 routes.) Again this question was apparently of no help in identifying redundant routes.

We have a further concern with this question about route redundancy. The gist of the question is that if the route is not redundant (143 out of 144) (i.e. Public motorized uses of this route can not be adequately met by another route.) then that is an argument for designating the route as open for motorized use. Neither the form nor the analysis permit the argument that public non-motorized uses may best be met by closing the route to motorized use (or not designating it motorized) and that the public non-motorized use can not be met by another route. We believe that is the case with many routes.

Season of Use:

According to Map 146, Alt D only seasonally closes ½ mile of route. (It is hard to tell where.) However the RMP states (2-171) for Alt D that the higher-elevation parts of Sykes Ridge Rd and Burnt Timber Ridge Rd on East Pryor will be seasonally closed from April 15 to June 15 “to protect wild horse foaling.” Alt B (Map 144) shows 7 miles of seasonal closure on higher elevations of East Pryor Mountain.

We support this seasonal closure. Map 146 should be corrected to match the text. However we ask that the closure begin December 1 instead of April 15. We know that a few people with “monster trucks” consider it a challenge to

bust through and around the snow drifts to get to the top in the winter. Unless BLM has the capacity and intends to regularly patrol the higher elevations to monitor winter use and enforce regulations like staying on designated routes, this route should be closed to vehicle use during the winter as well as spring in order to sufficiently protect horses, as well as other wildlife and resources.

The reason for the seasonal closure should be expanded to include the fact that it is winter and the higher elevations are snowed in. Signs and seasonally closable barricades like those Custer NF has installed on Big Pryor Mountain should be installed.

Administrative Routes:

Generally we approve designation of routes for administrative use only – but only when there is a clear and specific administrative use identified.

Map 146 (Alt D Pryors TMA) shows 60 miles of “Administrative Use Only” routes. (This is in addition to the 130 miles designated for public and administrative use.) Simply looking at the map raises significant doubt that all these have clear administrative justification. Many seem redundant, closely paralleling each other. Others have more forks and branches than are likely to be needed. See for example the routes in sections 6, 26, 31 and 32 (PM 1050 and “friends”), T9S, R27 E. Others such as the Demijohn Flat and Turkey Flat “roads” no longer exist or are un-drivable. Clearly they are neither needed nor being used for administrative purposes.

We did not have time to study all the route inventory sheets, but we note that route PM1013 (Royce Cave) is recommended “closed to all uses” in Alt D, but is shown open for administrative use on TMA map 146.

The bureaucratic history of these routes is questionable. (See table below based on the following data from the RMP.)

1. Table 1(a) in Appendix O (O-9) indicates 116 miles open, 2 miles administrative, 14 miles closed for a total of 132 miles of routes in the Pryors TMA in Alt A (current condition and no action alternative). (Table 5, O-15 and Table 9, O-22 show the same for Alt A.)
2. But Map 143 for the Pryors TMA Alt A shows 119 miles open, 2.5 miles administrative and 103.5 miles closed for a total of 225 miles of routes. The tables and the map agree closely on the categories of Open and administrative routes. But apparently 90 miles of previously unknown routes were discovered after the tables were constructed. These “new” routes were then identified as closed. Probably these were mostly user created scars on the ground.
3. Then in Alt D Map 146 nearly 60 miles of these previously unknown routes become needed(?) administrative routes. (Table 13 which would directly compare Alt A and Alt D is missing from the RMP.)

Pryors TMA	Alt A Table 1(a), 5 & 9 No Action (Current Status)	Alt A Map 143 No Action (Current Status)	Alt D Map 146 Preferred Alternative
Open Routes (all)	116 miles	119 miles	130 miles
Administrative Only	2 miles	2.5 miles	60 miles
Non-Motorized Only	0	0	0
Closed Routes	14 miles	103.5 miles	35 miles
Total	132 miles	225 miles	225 miles

The Pryors Coalition strongly suggests that BLM reconsider each of these routes designated for administrative use. Only those routes, forks, and branches for which a clear and distinct administrative need can be demonstrated should be kept. The rest should be decommissioned, and removed from the system. They should not even be called “closed” routes.

If BLM is not prudent and judicious in designating administrative routes for its own use, it will be harder for BLM to justify responsible limits on public motorized use.

Dispersed Camping:

BLM proposes (Alt D) “*Excluding WSAs and ACECs, motorized wheeled use off designated routes for the purposes of camping would be allowed only on previously disturbed areas, for a distance up to 50 feet from the centerline of the route.*” (2-128)

We strongly support this regulation. In this arid landscape driving off of designated routes damages fragile soils and unique native vegetation, and spreads noxious weeds. And it is unnecessary for camping. People who want to camp 300 ft from the road can carry their gear 300 ft. We note that a corridor 300 ft on either side of a road is 72 acres for each mile of road that would potentially be impacted.

For similar reasons we also support, “*Motorized off-road big game retrieval would not be allowed for the general public.*” (2-129)

Snowmobiles:

The draft RMP does not say much about snowmobiles. Several places it is stated that snowmobiles would be “limited to designated routes” in certain areas (e.g. ACECs, PMWHR) (2-147, 2-173) and “WSAs would continue to be closed to ... snowmobile use” even if Congress releases the areas from wilderness consideration (2-169). This is good and will protect much of the BLM land in the Pryors.

However the RMP also says “Snowmobile use in the decision area would be allowed, except where restricted....” (2-128) The Pryors Coalition would like to see snowmobiles treated like other motor vehicles. The RMP says “Motorized travel in TMAs would be limited to designated roads and trails.” It is not clear whether this statement is intended to include snowmobiles. We think the statement should explicitly include snowmobiles as is done in other places in the RMP.

We note the recent (March 2013) Idaho District Court decision that the snowmobile exemption in the Forest Service 2005 Travel Management Rule did not comply with Executive Order 11644.

A Vision for the Pryors?

The Pryors Coalition is concerned that neither BLM nor CNF appears to have any overall Vision or Master Plan for the future of the Pryors. What role will this small, unique, vulnerable and very special area play in contributing to the quality of life of people in this part of Montana and Wyoming during the next two or three decades? How will people enjoy the Pryors sustainably? How will the resources be preserved? A Master Plan would provide a guide for all management decisions.

A Master Plan would, for example, guide planning for public access including a wide variety of motorized and non-motorized modes of travel. What are the access needs? What routes (of all types) can best meet these needs and best preserve the values of the Pryors? All (past and present) planning for the Pryors seems to be done piecemeal. Instead of beginning with a global view of the area, travel planning begins, and ends, with largely independent route segment by route segment decisions about whether each segment should or should not allow motor vehicles.

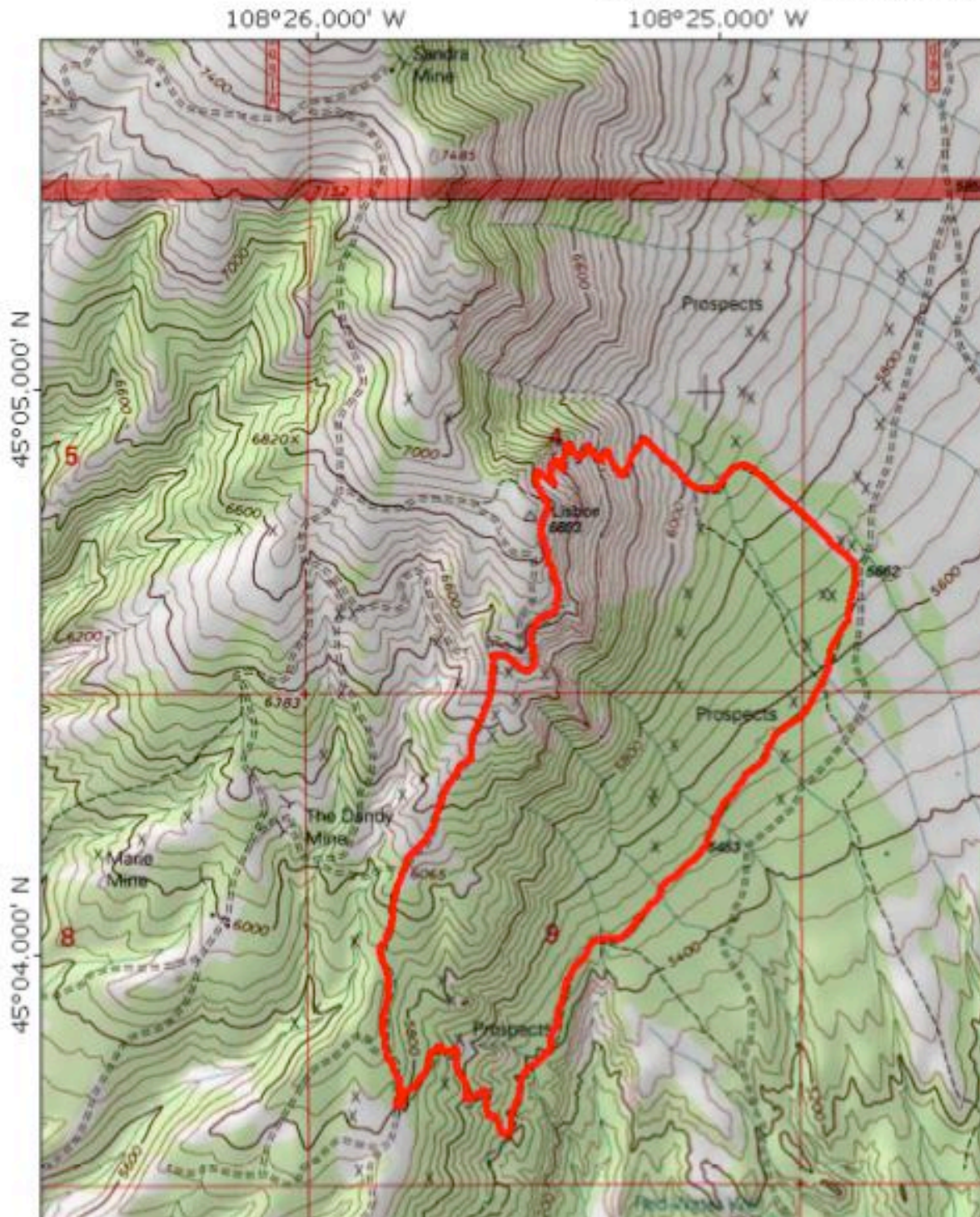
Although special designations in the Pryors such as ACECs, LWCs and WSAs are generally well done in the current RMP, each seems to be an individual and isolated decision. Each of these designations does act as a Master Plan for that local area guiding other planning for that area, but the various designations are not fit into an overall Vision for the Pryors.

Sincerely,

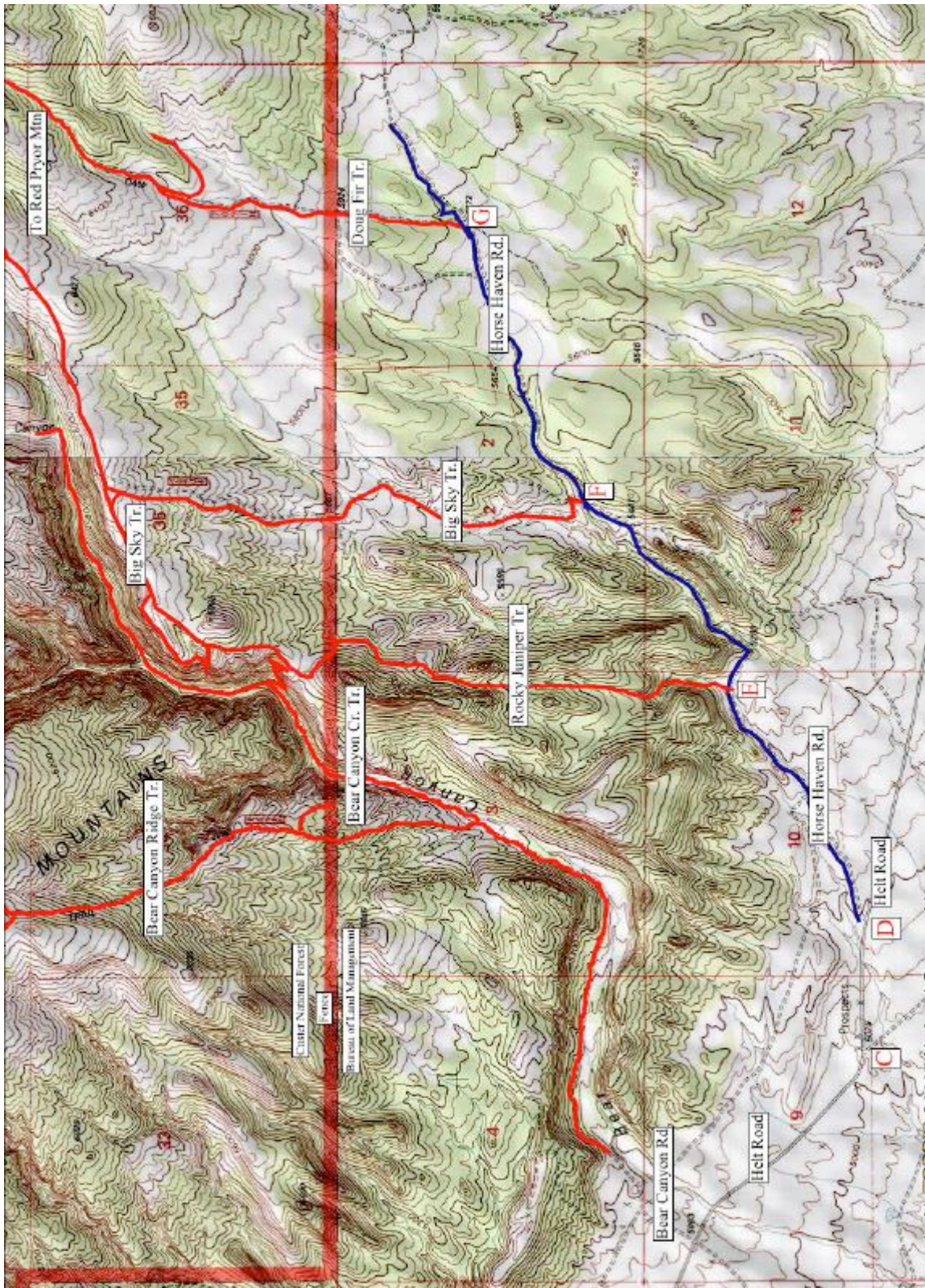
/s/ Dick Walton

Dick Walton
for

The Pryors Coalition
info@PryorMountains.org
www.PryorMountains.org



Lisbon – Dandy Mine Loop Trail



**Bear Canyon, Big Sky and Doug Fir Trails
(and others)**