

April 5, 2016

Forest Service
Attn: Forest Plan Revision
Custer Gallatin National Forest
10 E Babcock, P.O. Box 130
Bozeman, MT 59771

Virginia Kelley, Forest Plan Revision Team Leader et al.,

The Pryors Coalition appreciates the opportunity to provide input into the initial Assessment phase of the Forest Planning Process.

The Pryors Coalition represents a number of organizations and many “unattached” individuals who may or may not be associated with those organizations. Associated organizations include Yellowstone Valley Audubon Society (YVAS), the Eastern Wildlands Chapter of the Montana Wilderness Association (EWC/MWA) and Our Montana. The defining characteristic of Pryors Coalition Associates (organizations and individuals) is a strong desire to preserve this very special and vulnerable landscape for the future. Thus the comments below are addressed primarily to management of the Pryors unit of the Custer Gallatin National Forest.¹

The Need for a New Management Plan:

We understand the objective of “Phase I – Assessment” is to evaluate the current situation and trends to “*help inform the need to change the 1986 (Custer) Forest Plan*” (CGNF), which includes the Pryors. As the Forest Service has said, a lot has changed since 1986. The population has increased significantly. Public interest in and uses of National Forest land have changed considerably. This is particularly true of the Pryors. In addition much of the land for which the 1986 Custer Plan was drafted was removed from the Custer in 1998 leaving a quite different mix of lands in Custer NF. Also the new 2012 Planning Rule provides very different planning guidance than the Rule under which the 1986 Plan was written. For all these reasons it is an extreme understatement to call this a Forest Plan revision. Whatever it is called, so much of the Plan will need to be “revised” that we might better think of most of it as a new Forest Plan.

The “current” Plan is 30 years old and will be at least 33 years old by the time it is replaced by the new Plan in about 2019. Thus we should think in terms of the possibility that the new Plan might be in effect until 2052. We owe it to the future to think very hard and very carefully about sustainable management of the Pryors. (36 CFR § 219.9)

Good Planning Begins with a Good Vision (“Desired Future Condition”):

A major objective of the Custer Gallatin Forest Plan Revision is to “*create a VISION*” for the National Forest for the coming decades.” (Virginia Kelly, Forest Plan Revision Team Leader. Emphasis in original.) In 2007 the Pryors Coalition drafted a “Vision” for the Pryors. (See Appendix or www.pryormountains.org/management-issues/vision/) We believe this Vision is still a valid guide for management of the Pryors.²

Unfortunately the 1986 Management Plan did not have any Vision for the future of the Forest. The “*Desired Future Condition of the Forest*” section of the 1986 Plan (pages 9-12) never mentions “desired future conditions.” It briefly attempts to project what the future conditions will be as a result of proposed management. It appears that management plans were decided, then results were predicted. It should be the other way around. Desired future conditions should be determined first, then management should be planned to achieve the desired future. The FS 2012 Planning Rule agrees, but the 1986 Plan badly fails to satisfy this Rule.³

¹ Nevertheless some comments may apply elsewhere on the Custer Gallatin National Forest.

² Some details may need updating due to changes since 2007 but most details and the general concepts are still valid.

³ 36 CFR § 219.7 (e) (1) “*Every plan must include... (i) Desired conditions. A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined...*” (Emphasis added.)

Furthermore this “Desired Future Condition” section of the 1986 Plan mostly emphasizes oil, gas, coal, timber, minerals, grazing and road building.

More specifically the 1986 Plan has no Vision for what the Pryors could or should be for the future. In fact the “Desired Future Conditions” section does not even mention the Pryors.⁴ The entire 191 page 1986 Custer Plan rarely mentions the Pryors in any substantive way, let alone has a section devoted to a Vision for the future of the Pryors, or management goals and direction to achieve that vision for the Pryors.⁵

The above facts demonstrate a significant defect in the 1986 Plan that needs to be corrected in the new Plan. The Pryors are unlike any other landscape on the entire Custer Gallatin NF. They are very different from the rest of the Beartooth District into which they are lumped. The Pryors Unit is geographically separate, and differs remarkably geologically, ecologically and culturally. Its vulnerabilities are different and public interest in the Pryors is quite different from interest in the rest of the District and the Forest. Some way or place needs to be found in the new Plan to describe a distinct Vision (or Desired Future Condition) for the Pryors Unit, and to give specific management direction to achieve that Vision.

The Pryors Coalition’s Vision would be a good starting point for development of a CGNF Vision for the Pryors. In 2008 Custer NF dismissed the Pryors Coalition’s Vision with its intrinsic designation of motor-free conservation areas. The Forest stated that such designations were a Management Planning issue. Now that the CGNF is doing Management Planning it is certainly time to consider this Vision seriously.

Assessment Topic: Terrestrial and Aquatic Ecosystems and Watersheds

The 1986 Custer Plan surprisingly fails to adequately address the unique and diverse ecosystems in the Pryors. CNF is aware of and has documentation of this important value of the Pryors landscape. This includes the designation of an Important Bird Area (IBA) by the Audubon Society⁶, and of an Important Plant Area by the Montana Native Plant society.⁷

We call the Custer Gallatin NF’s attention to some additional evidence of the well-known ecological importance of the Pryors. In 2012 the FS participated in and helped fund a BioBlitz in the Pryors. This collaboration of numerous expert biologists and citizen scientists demonstrated both the biodiversity of the Pryors, and public interest in that important value. Additionally Dr. Jennifer Lyman, Botanist, and two of her students have recently done a study of a sample of the special plant communities in the Pryors. A version of this has been prepared for the public and is available at www.pryormountains.org/natural-history/botany/botanical-guide/. This again shows the value of the Pryors for scientific study, education and public interest.

Yet with the exception of a small WSA (with a tiny RNA inside it) the overwhelming majority of the Pryors Management Area Designations (B, D, and G) emphasize commodity extraction such as intensive grazing, timber and minerals. See the Management Area map in the Appendix. 1986 Management Areas B, D and G constitute more than 80% of the USFS Pryors.

The language for Management Area B includes (1986 Custer Plan, page 45):

Goal: *“To provide for the continuation of livestock grazing, implementation of intensive range management systems and the facilitation of minerals and energy development with consideration of other resource needs. ...adverse impacts to the wildlife habitat will be mitigated where feasible, but not to the exclusion of range and mineral/energy management and development activities.” “Intensive grazing systems are preferred....”*

“A high density of structural range improvements is expected as a result of developing intensive range management systems.” (Emphasis added.)

This clearly states that grazing and minerals are primary, and the ecosystem is at best secondary. This 1986 language is not compatible with the FS 2012 Planning Rule.⁸

⁴ There is one short sentence about the Lost Water Canyon WSA.

⁵ There are brief mentions of the small Lost Water Canyon WSA and the area in the Horse Range.

⁶ www.pryormountains.org/wp-content/uploads/2015/10/Bear-Canyon-IBA.pdf

⁷ www.pryormountains.org/natural-history/botany/important-plant-area/

⁸ 36 CFR § 219.8 (a) (1) “The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area....” (Emphasis added.) and 36 CFR § 219.19 Definitions. Ecological integrity. The quality or condition

A thousand acres of inholdings were purchased by the FS in 2005 using LWC funding. District Ranger David Schmid said, *"The Schwend lands will be managed for dispersed recreation such as hunting, hiking, birding, camping, wildlife and wildflower viewing.... Management emphasis for these lands will be to provide quality wildlife habitat for species such as mule deer, black bear, raptors, grouse and migratory songbirds. Historical elk range and habitat for Yellowstone cutthroat trout also occur on the lands."* (Billings Gazette 7/7/2005)

Instead these lands have been absorbed into Management Area B with an intensive grazing emphasis.

The Pryors Coalition does not oppose cattle grazing in the Pryors, but we do not think any part of the Pryors should have intensive grazing as the priority management goal.

We were surprised to see the FS describe Management Area D as *"emphasizing wildlife."* (Billings meeting, March 9, 2016) A reading of the Management Area direction in the 1986 Custer Plan (page 53) doesn't support this claim – although the direction is a bit better than Management Area B. There is some language *"emphasizing wildlife."* But it is repeatedly qualified as referring only to *"selected species"* which for the Beartooth District including the Pryors are only a few hunted species.⁹ It is explicitly stated that these species are *"not indicator species"* for other wildlife. Non-selected species merely *"will be considered."*

This language is not compatible with the 2012 Planning Rule.¹⁰

Management Area G is described." *This management area includes lands classified as suitable for timber management....*" and the goal is *"To manage these areas for the maintenance and improvement of a healthy diverse forest and as a source of wood products...."* (1986 Custer Plan, page 64)

We do not consider the 1986 Management Area B, D and G direction at all appropriate for preservation of the unique biodiversity of interest to scientists, students and the public. This public interest ranges from bird and wildflower watching to hunting. If the intention for Management Area D is *"wildlife emphasis"* then the language needs thorough revision to include the wide diversity of all wildlife, not just a few selected species. *"Wildlife emphasis"* should include both the fauna and the flora on which it depends.

The History of Pryors Management Areas:

The history of Management Area B and D designations is informative. In the 1986 Custer Plan 1.5 million acres were designated as Management Areas B and D. More than 1 million of these acres were in North and South Dakota Grasslands, with another 355,000 acres in the Ashland District. Thus the management direction for these Management Areas was designed for grassland and grazing land in the Dakotas.

Most of the Pryors Unit was lumped into these same Management Areas with the much larger Grasslands despite the great differences between the Pryors and the Grasslands (geologically, ecologically, floristically, culturally, socially and geographic distance). The approximately 60,000 acres of Management Area B and D in the Pryors constitute only 4 % of those Management Areas and therefore didn't influence their management direction. But Management Areas B and D are approximately three quarters of the FS land in the Pryors. So the impact on management of the Pryors has been huge.

of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation...."

⁹ *"Elk, Bighorn Sheep, Black Bear, Moose."* (1986 Custer Plan, page 45) In the Pryors this is effectively only bighorn sheep and black bear – unless the Forest works to reestablish elk which are probably absent largely due to high road density and lack of secure habitat. If elk are a *"selected species"* to be managed for, CNF has not done well in the Pryors. Populations of elk and mule deer in the Pryor Mountains are inextricably tied to their habitats. The Forest Plan should focus intently on policies and standards for good stewardship and enhancement of wildlife populations in the Pryor Mountains.

¹⁰ 36 CFR § 219.9 *"This section adopts a complementary ecosystem and species-specific approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area. Compliance with the ecosystem requirements of paragraph (a) is intended to provide the ecological conditions to both maintain the diversity of plant and animal communities and support the persistence of most native species in the plan area. Compliance with the requirements of paragraph (b) is intended to provide for additional ecological conditions ... for individual species...."* e.g. listed threatened and endangered species. (Emphasis added.)

Since 1998 the Dakota Prairie Grasslands have no longer been part of Custer NF (and thus are not part of the Custer Gallatin NF). But the Management Area directions designed for the Dakota Prairie Grasslands still control management of most of the Pryors.¹¹

On the one hand the Pryors were lumped with the much larger and very different Dakota Grasslands (and the Sioux and Ashland Districts). On the other hand the Pryors are part of the much larger and very different Beartooth District. In terms of appropriate management of this special area the Pryors have clearly fallen through the cracks.

The Pryor Mountains are unlike any other landscape in the Custer Gallatin NF. For proper management they need a distinct and separate Management Plan.

Assessment Topics: Areas of Tribal Importance and Cultural and Historical Resources

The 1986 Custer Plan totally fails to recognize the Tribal Importance and Cultural Resources in the Pryors. Other than generic language in forest wide management direction, there is nothing in the Management Area direction for any part of the Pryors that mentions the Tribal Importance and Cultural Resources. There is no language for the Pryors like, “*In addition, the Tongue River Breaks area contains cultural sites which are of concern to the Northern Cheyenne tribe.*” or “*Native American religious concerns will be taken into account in management of the Tongue River Breaks.*” (Management Area J.¹²) There is no language for the Pryors like, “*Included in this Management Area are significant religious sites for the Low Hat Clan of the Hidatsa Tribe. The area is very rich in archeological resources dating from historic to prehistoric.*” (Management Area K – none in the Pryors.)

Custer NF has an abundance of documentation of the archeological significance of the Pryor Mountains,¹³ and of their importance as an ethnographic landscape. For example: “*The significance of the Pryor Mountain Unit to the Crow cannot be overemphasized. It is used on a regular basis for fasting, plant collection – medicinal... subsistence... and ceremonial... [A]reas of the Pryors such as the Dry Head Overlook are associated with the fasting sites of individuals important in Crow history (e.g., Plenty Coups...).*”¹⁴

We provide additional evidence. The video “The Pryor Mountains – Crow Sacred Lands” was produced by the Pryors Coalition in 2014 and is available at <http://www.pryormountains.org/cultural-history/crow-sacred-landscape/>

In this video Crow Elder Burton Pretty On Top eloquently discusses the importance of the Pryors to the Apsaalooke (Crow). Pretty On Top was Cultural Director for the Crow Tribe for about eight years.

In addition to its importance to the Crow people, cultural and historical resources and religious aspects of the Pryors are important to many non-Indians. Evidence for this includes public reception of the video. Hundreds of people have watched the video. A large crowd attended an EWC/MWA showing in April 2015. The video was shown in October 2015 at the Montana state teachers convention (MEA-MFT) at the request of public school teachers. In February 2016 there was a standing-room-only crowd at a public showing by the Yellowstone Valley Audubon Society. The video page at www.PryorMountains.org has been visited 1,000

¹¹ In the remaining Custer NF the Pryors are only about 10% of Management Areas B and D which are mostly in the Ashland and Sioux Districts in eastern Montana and South Dakota.

¹² According to 1986 Plan direction for Management Area H (Lost Water Canyon WSA), if Congress does not designate this a Wilderness the area “*will revert to Management Area J.*” But there is no language, like that quoted above, for either H or J, recognizing any tribal or cultural importance of this (or any) part of the Pryors. Furthermore this WSA is only about 10% of the FS Pryors, and is not the part of the Pryors that would be first considered for cultural protection.

¹³ This includes extensive reports by archeologist Lawrence L. Loendorf of Archeology Surveys in the Pryor Mountains in 1968, 69, and 70, and an Archeological Excavation in 1971. There are additional reports by Stuart W Conner and others.

¹⁴ “Ethnographic Overview of the ... and Beartooth Ranger Districts of the Custer National Forest.” by Deaver and Koistra-Manning, 1995, page 4.95.

Additional information about the Pryors is in “Every Morning of the World” an Ethnographic Resources Study by Nabokov and Loendorf, 1994.

times since it was posted last year. Of more than 100 pages on the website the video page is the 12th most visited page.¹⁵

For many non-Indians as well as Indians the sacred value of the Pryors is an important part of their appreciation for, and experience of the Pryors. Management of the Pryors should reflect this importance to both Indians and non-Indians. Management should enhance this experience for both.

Assessment Topic: Existing designated areas ... including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.

Wild and Scenic Rivers:

Crooked Creek should be designated a Wild and Scenic River to match the recent proposal by BLM for the 3-mile section south of the FS/BLM boundary. This is really a no brainer and doesn't need much discussion. The FS section is longer, wilder and more scenic than the BLM section.

Apparently Custer NF did all they could in Forest Plan Amendment #2 in 1989 finding 8 miles of Crooked Creek eligible for W&S designation. The Pryors Coalition asks that the CGNF reaffirm this finding in the new Management Plan, and do whatever is possible to encourage Congress to act and designate both the FS and BLM sections.

Bear Canyon Creek is another obvious opportunity for Wild and Scenic designation. CGNF should do so in the new Management Plan.

Punch Bowl Creek and Dryhead Creek and should also be seriously considered for Wild and Scenic designation.

Wilderness:

In our 2007 Vision the Pryors Coalition proposed designation of several enclaves in the Pryors for conservation and quiet recreation as a key component of a balanced "desired future condition" for this special public landscape.

There are several outstanding opportunities for special designations in the Pryors. The already designated Lost Water Canyon Wilderness Study Area can and should be expanded to the west to include Crooked Creek Canyon and the Wild and Scenic Crooked Creek. Three other Wilderness Areas can and should be designated in the Pryors. (See maps in Appendix.)

The 11,100 acre Bear Canyon Wilderness Area includes part of the Audubon Important Bird Area and part of the Montana Native Plant Society Important Plant Area on the south facing slope of Big Pryor and Red Pryor Mountains. It includes much of the Bear Creek watershed ranging from arid semi-desert almost to the sub-alpine plateau with a corresponding range of ecosystems. Elevations range from 5,400 to 8,600 feet.

The 12,400 acre Big Pryor Wilderness Area includes a spectacular sub-alpine plateau and dense Douglas fir forests on north-facing slopes. The area is significant elk and deer habitat with elevations ranging from 6,800 to 8,700 feet. A significant part of this area is an important ethnographic landscape for the Apsaalooke (Crow). The high point near the northeast "corner" of Big Pryor Mountain is topographically very similar to the northeast "corner" of East Pryor Mountain at Dryhead Vista. The Big Pryor high point and areas nearby are at least as ethnographically important as the Dryhead area. Driving to the edge and point at Dryhead is no longer permitted. Unfortunately driving is still permitted near the edge and to the highest northeast point of Big Pryor.

The 8,800 acre Punch Bowl Wilderness Area is prime historic elk and deer habitat. Its location on the north face of East Pryor Mountain provides for very different ecosystems than the other areas with south and west facing slopes. The potentially Wild and Scenic Punch Bowl and Dryhead Creeks drain the area toward the east.

The expanded 14,400 acre Lost Water / Crooked Creek Wilderness Area includes all the amenities in the smaller designated Lost Water Canyon WSA plus the spectacular and rugged Wild and Scenic Crooked Creek Canyon. In between, Commissary Ridge is culturally important to the Crow. All of this area is within the Montana Native Plant Society Important Plant Area.

¹⁵ The video has also been shown on Community Seven TV.

It is clear that all four of these areas satisfy the criteria for Wilderness designation in both size and wilderness character. They would enrich the Wilderness system in Montana by adding areas unlike any other designated Wilderness in the state. In fact, due to the landscape diversity within the Pryors, this would add four Wilderness areas very unlike each other.

A primary reason for designation of these areas is to preserve part of the Pryors landscape and ecosystems in their natural state. The Pryors do not currently meet accepted standards (by wildlife biologists) for elk and deer habitat in terms of secure habitat and road density.¹⁶ Designation of these Wilderness areas (particularly the Big Pryor and Punch Bowl Areas) would help correct that problem. The elk and deer should be considered an indicator for other wildlife. As stated before the Pryors Coalition is concerned with all native flora and fauna in their natural ecological balance – not just “wildlife” which may be more narrowly defined

As a secondary benefit these Wilderness designations would provide needed opportunities for quiet non-motorized recreation in the Pryors. (See elsewhere in this letter.)

It is difficult to think of any compelling reasons NOT to designate these four Wilderness Areas. Quoting from Management Area J in the 1986 Custer Plan: *“These areas [would] offer a unique opportunity for non-motorized recreation in a larger area that is mostly all available by vehicles.”* (This language refers only to the Cook Mountain and King Mountain areas in the Ashland District, but should apply to these four Wilderness Areas.) And these Wilderness designations would greatly help conserve the natural and cultural landscape and ecosystems.

Of course these Wilderness Area designations would require considerably different management direction from that in the current (1986) Management Areas B, D and G. There is no language for these dominant Management Areas, B, D, G, more than 80% of the FS Pryors, like:

“To maintain these areas in a LDA [low development area] setting, to let natural processes play their role in most cases. The intent of management will be to constrain activities in such a way that human use leaves little permanent or long-lasting evidence.” or “To protect the scenic, cultural, archeological and wildlife resources that occur in the area. Conflicts that cannot be successfully mitigated will be resolved in favor of preserving these resources.” (Both in Management Area J.)

Assessment Topic: Recreation settings, opportunities and access and scenic character

There is surprisingly little mention of public activity or “use” in the “direction” for ANY Management Area in the 1986 Custer Plan. What is nearly universal is direction regarding timber, range and minerals. This is a very out of date approach to public land management. Public activity includes amateur and professional study and education in areas such as botany, ecology, geology and archeology. It includes wildlife watching including birds and wildflowers and viewing scenic landscapes. It includes photography, hunting and much more. It also includes motorized and non-motorized recreation. All of the above should be considered “recreation.”

The absence of mention of public “recreation” is particularly acute in the Pryors management areas. Nowhere is there even mention that the Pryors are “scenic” which must be taken into account according to the FS 2012 Planning Rule.¹⁷ There are no comments for the Pryors like, *“A portion of the Blue Buttes area contains significant cultural and scenic values that warrant special management consideration.”* (Emphasis added.

¹⁶ Road densities less than 1.0 mi/sq mi, and more than 30% “secure habitat” defined as areas over 250 acres more than ½ mile from open roads.

Canfield, J. E., L. J. Lyon, J. M. Hillis, and M. J. Thompson. 1999. Ungulates. Pages 6.1-6.25 in G. Joslin and H. Youmans, coordinators. Effects of Recreation on Rocky Mountain Wildlife: A Review for Montana. The Wildlife Society, Helena, Montana, USA.

Hillis, J. M., M. J. Thompson, J. E. Canfield, L. J. Lyon, C. L. Marcum, P. M. Dolan, and D. W. McCleerey. 1991. Defining Elk Security: The Hillis Paradigm. Pages 38-54 in A. G. Christensen, L. J. Lyon, and T. N. Lonner, compilers. Proceedings of Elk Vulnerability – A Symposium. Montana State University, Bozeman, Montana, USA.

¹⁷ 36 CFR § 219.8 (b) “Social and economic sustainability. *The plan must include plan components, including standards or guidelines, to guide the plan area’s contribution to social and economic sustainability, taking into account: (2) Sustainable recreation; ... and scenic character;*” (Emphasis added.) and § 219.19 *“Definitions. Scenic character. A combination of the physical, biological, and cultural images that gives an area its scenic identity and contributes to its sense of place.”* (Emphasis added.)

Management Area K – none in the Pryors.) Non-motorized recreation is not mentioned at all in the major Management Areas B and D (3/4 of the FS Pryors). There is barely a semi-mention in G.¹⁸ There is no language for the dominant Management Areas, B, D, G, more than 80% of the FS Pryors, that: “*These areas offer a unique opportunity for non-motorized recreation....*” (Management Area J.)

We understand that the Management Plan does not make site-specific decisions such as designating non-motorized routes. But the new Management Plan can and should include a vision, goals and direction regarding providing reasonable and balanced quiet recreation opportunities in the Pryors.

There is a significant demand and unmet “need” for non-motorized recreation opportunities in the Pryors. This demand is demonstrated by the heavy visitation of the Hiking in the Pryors pages at www.PryorMountains.org/welcome-to-the-pryors/hiking-in-the-pryors/. These hiking guide pages are some of the most frequently visited pages on the Pryors website.¹⁹ Yet the Forest has designated only one short non-motorized route in the Pryors. It is only 1.6 miles long.¹⁹ We are not aware of any FS brochures, maps, or webpages that mention this (or any other) trail in the Pryors and inform the public about it.²⁰ The FS should serve the public by providing information and maps for a number of signed trails in the Pryors. The FS needs to acknowledge that the Pryors are near the largest population center in Montana and Wyoming – and increasingly draw visitors from more distant locations. Many of these people want opportunities for hiking and other quiet recreation and solitude in the Pryors. Part of the FS mission is to “meet the needs of the American people.”²¹

The 1986 Management Plan including Management Area direction is essentially silent regarding public activity in the Pryors. The new Management Plan should include a Vision (“desired future condition”) including opportunities for public activity (including quiet recreation, broadly defined). The new plan should not only envision such opportunities, it needs to include management direction to provide such opportunities (within sustainable limits), and to deal with the very likely continuing increase in such public visitation to the Pryors in the next few decades.

Management goals and guidelines for all public activities in the Pryors must consider the limits the land can tolerate. What is needed?, What is enough? and What is sustainable?

For example Management Area direction for the Pryors needs to consider the sustainability of travel routes (both motorized and non-motorized). To sustain travel routes and the landscape over time requires monitoring, maintenance, enforcement of travel restrictions, and noxious weed control. The Forest is far from having sufficient staff and budget capability to carry out these necessary activities on the current travel system in the Pryors to preserve the natural and cultural landscape. The Forest rarely if ever catches the people who drive off authorized routes. Noxious weeds, frequently introduced and spread by motor vehicles (and other human-related vectors) are currently a major threat of irreversible eco-degradation. The new Management Plan must address these issues of sustainability according to the 2012 Planning Rule.²²

¹⁸ “*The recreation setting will primarily be roaded natural and rural. Small areas of semiprimitive nonmotorized/motorized will occur...*” (1968 Custer Plan, pg. 64)

¹⁹ And that single short route to Crater Ice Cave and the top of Big Pryor Mountain is not properly signed or maintained.

²⁰ We are aware of at least four non-Forest Service webpages and one book that mention this trail.

²¹ 36 CFR § 219.19 Multiple use. *The management of all the various renewable surface resources of the NFS so that they are utilized in the combination that will best meet the needs of the American people....*” (Emphasis added.)

²² 36 CFR § 219.8 “Sustainability. *The plan must provide for social, economic, and ecological sustainability....*” and § 219.19 “Sustainable recreation. *The set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations.*” (Emphasis added.)

Management Area Direction for the Pryors:

The Pryors Coalition has argued that direction for all Management Areas in the Pryors (and the entire CGNF) should follow the following outline:

- First: Protect and preserve the natural and cultural resources.
- Second: Provide balanced recreational opportunities within limits landscape can tolerate sustainably for the future.
- Then: Consider commodity extraction (grazing, timber etc.) when they are compatible with preservation and public use.

As discussed above the 1986 Management Plan is not consistent with this approach. We were pleased to see that the 2012 Planning Rule mandates this priority of preservation over multiple use. The Planning Rule section on multiple use begins,

“§ 219.10 Multiple use.”

“*While meeting the requirements of §§ 219.8 and 219.9, the plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber,....*”

The key language is, “*While meeting the requirements of §§ 219.8 and 219.9....*” These two previous sections include abundant direction regarding, “*Sustainability. The plan must provide for social, economic, and ecological sustainability...*” (§ 219.8) and, “*Diversity of plant and animal communities. ... the plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystem....*” (§ 219.9).

We look forward to a new Management Plan for the Pryors that emphasized restoration and preservation of natural and cultural resources, and the long term sustainability of the landscape “*without compromising the ability of future generations to meet their needs.*” (36 CFR § 219.19, page 21272)

Other Assessment Topics:

Infrastructure, such as recreational facilities and transportation and utility corridors

Social, cultural and economic conditions.

Benefits people obtain from NFS planning area (ecosystem services)

Multiple uses and their contributions to local, regional and national economies

Threatened, endangered, proposed, candidate species and species of conservation concern

System drivers and stressors

Air, soil and water resources and quality

These topics are partly overlapping and entangled with previously discussed assessment topics. But a few additional comments may be in order.

As discussed above *recreational facilities* or *infrastructure* for non-motorized recreation is essentially non-existent in the Pryors. i.e. There are almost no designated, signed and maintained hiking trails. This is a *social* issue in that a substantial part of the public interested in the Pryors is not being served by the FS. Providing such opportunities would *benefit* the physical and mental health of people and families in the region. *Economic* studies show that the availability of opportunities for experiencing protected natural areas provides *economic* value to nearby communities. This would be true for Billings, and also for smaller communities like Bridger and Red Lodge, MT and Lovell, Cowley and Powell WY.

There are *species of concern* in the MNPS Important Plant area. There are also numerous animal *species of concern* in the Pryor’s listed by the Montana Natural Heritage Program, Forest Service and others. But more generally the FS should work to preserve the natural and unique ecosystems and plant and animal communities of the Pryors. This should not simply be a concern with several specific “listed” species. (36 CFR § 219.9) Noxious weeds (mentioned above) are a threat to both species of concern and all the special plant and animal communities in the Pryors.

“*Stressors*” for the Pryors include noxious and other invasive weeds, and heavy, sometimes uncontrolled, motor vehicle traffic. The inability of the Forest to maintain and enforce the motorized routes in the Pryors is a threat to fragile soils, and plant and animal communities – both by direct impact and by introduction of invasive and noxious weeds. Any threat to flora is a threat to fauna.

Summary:

The 1986 Management Plan for Custer NF including the Pryors is inadequate and misdirected for this special area. It, in fact, rarely addresses the Pryors or their unique characteristics. A major revision is long overdue. Custer Gallatin NF should develop a specific landscape scale Vision for the future of the Pryor Mountains, a fragile treasure close to the largest population center in Montana and Wyoming. Management Area designations, policies and standards must be established that will guarantee the preservation and restoration of the natural and cultural resources of this irreplaceable landscape past the middle of the twenty-first century. Opportunities for a spectrum of public recreation activities, including those that take place in Wilderness and on non-motorized trails, need to be provided and all activities managed to sustain the landscape.

Sincerely,

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Billings, MT 59101

Appendix

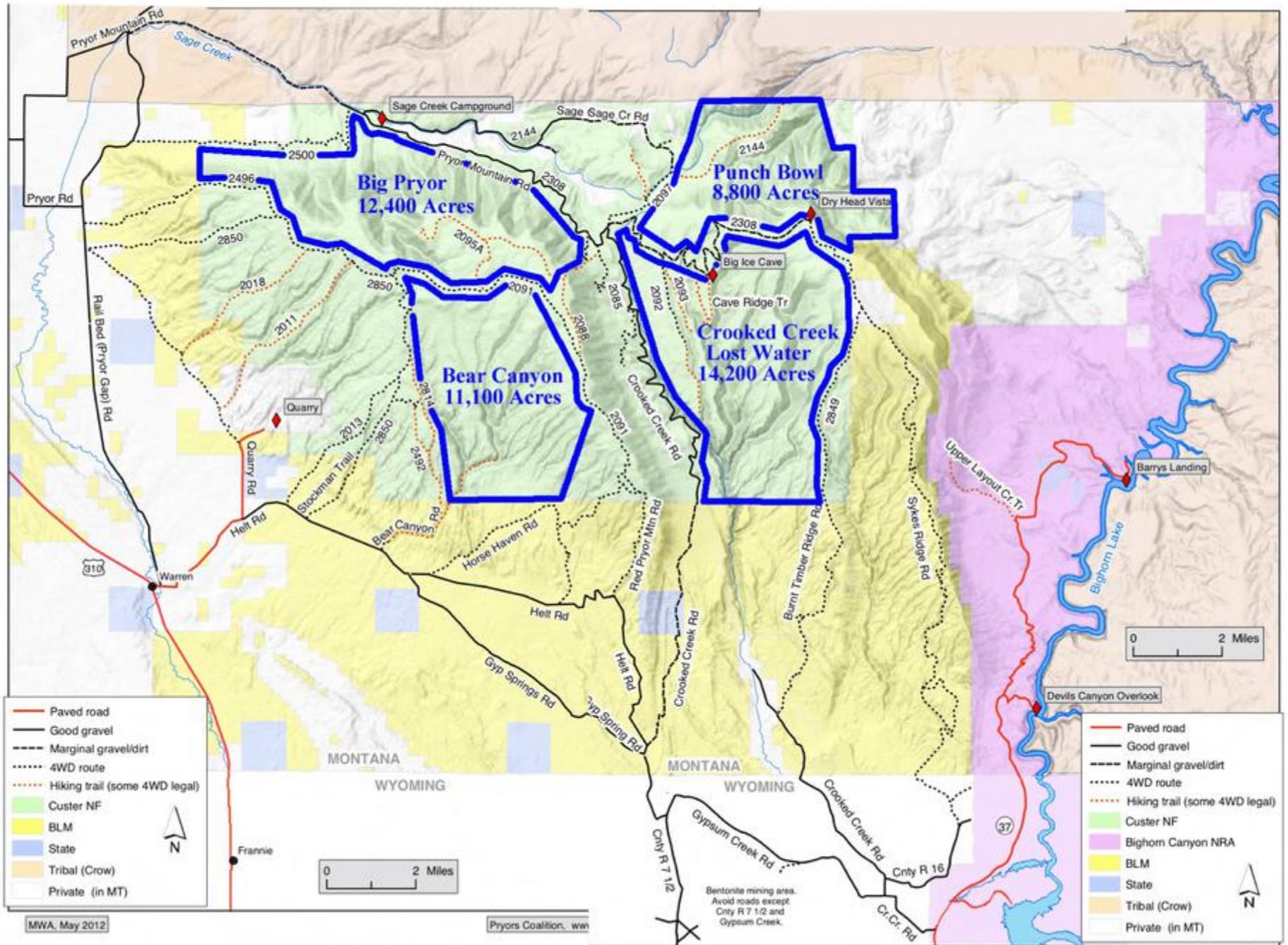
Contents:

Map: Potential Wilderness Areas in the Pryors

Map: Potential Wilderness Areas in the Pryors on MVUM

Map: Pryors Management Areas – 1986 Forest Management Plan

Potential Wilderness in Pryors (CNF)

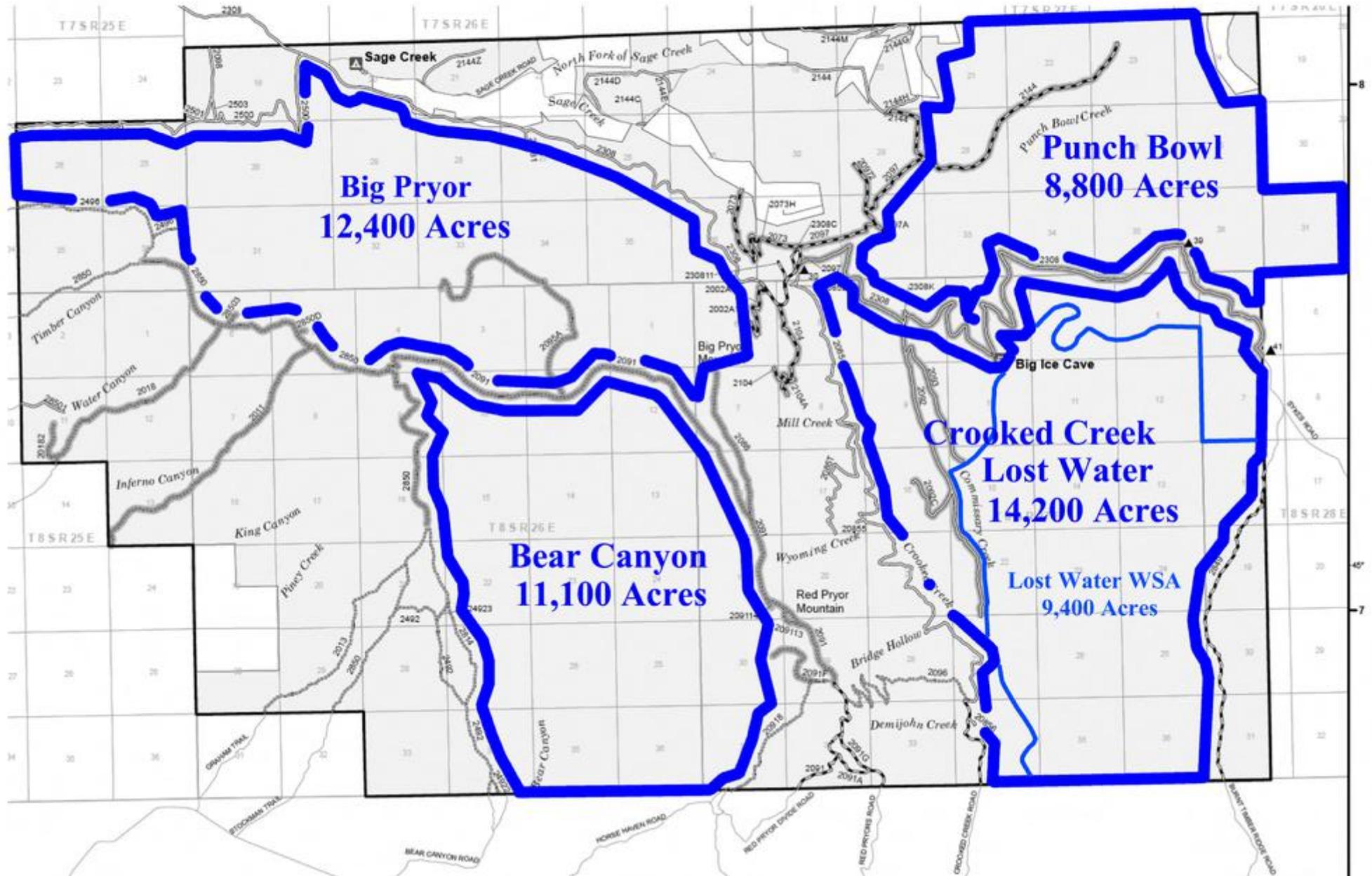


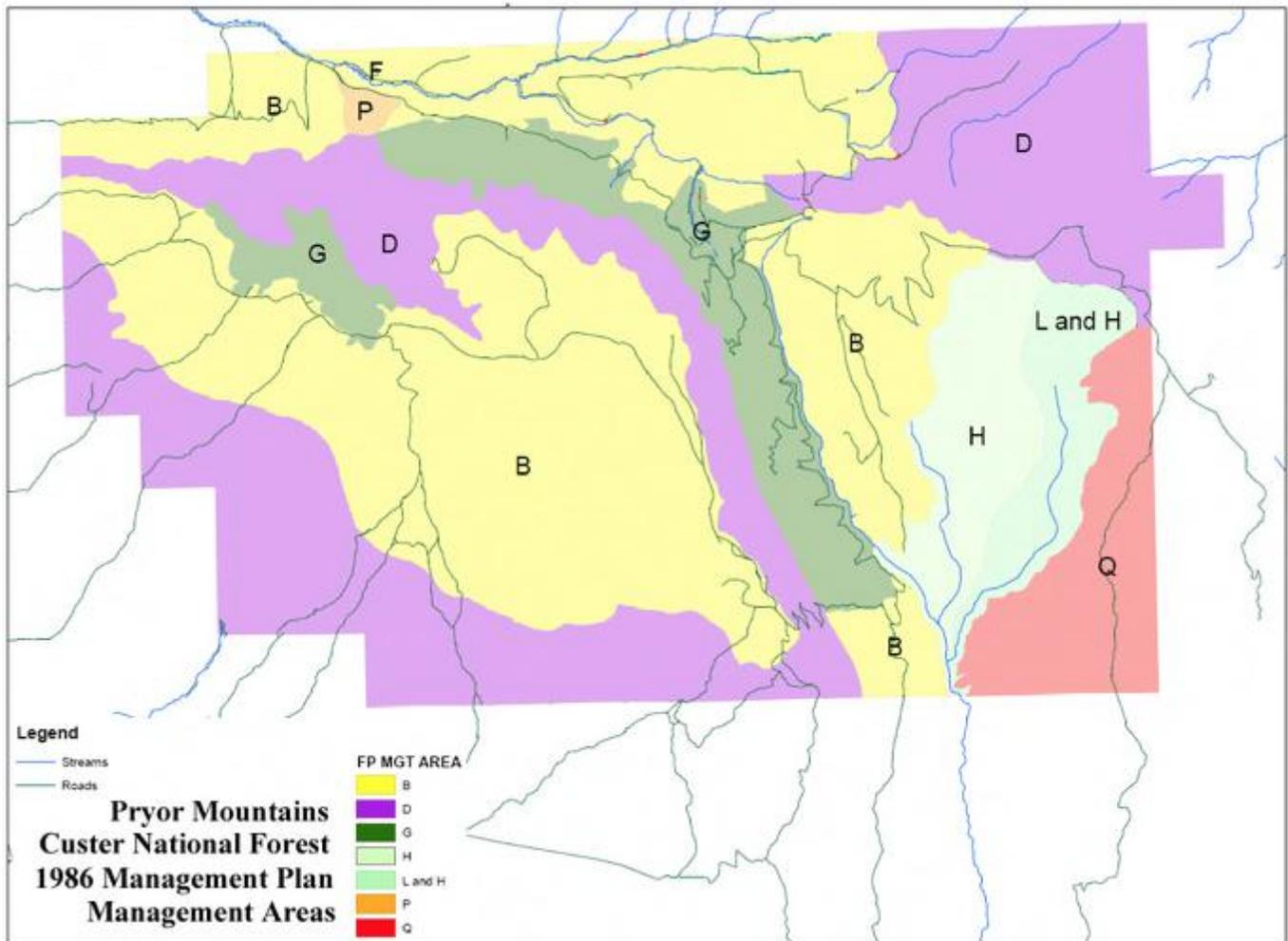
- Paved road
- Good gravel
- - - Marginal gravel/dirt
- ⋯ 4WD route
- ⋯ Hiking trail (some 4WD legal)
- Custer NF
- BLM
- State
- Tribal (Crow)
- Private (in MT)

- Paved road
- Good gravel
- - - Marginal gravel/dirt
- ⋯ 4WD route
- ⋯ Hiking trail (some 4WD legal)
- Custer NF
- Bighorn Canyon NRA
- BLM
- State
- Tribal (Crow)
- Private (in MT)

Bentonite mining area.
Avoid roads except
Cnty R 7 1/2 and
Gypsum Creek.

Potential Wilderness in Pryors - on Custer National Forest MVUM





Note: This Management Area map is adapted from a map produced by CNF for the 2015 Range Management EA. For unknown reasons CNF neglected to indicate private property inholdings. There are roughly 2,000 acres of private land in the north central yellow area that should be white instead of yellow. Their boundaries are very complex. In addition the 2015 CNF map showed many miles of user created tracks that are not motor-legal according to the 2008 Travel Plan. Most never were motor legal. Some were explicitly decommissioned 30 years ago in the 1986 Management Plan which created these Management Areas. These extraneous “roads” have been photoshopped out. The revised map is very close to the current CNF Motor Vehicle Use Map (MVUM). The grazing allotment areas have also been photoshopped out.