

April 13, 2017

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.,

Re: Wilderness Inventory to identify potential areas on the Forest that may be suitable to recommend as Wilderness, and Evaluation of the wilderness values of the areas identified in the inventory.

The Pryors Coalition and partner organizations¹ would like to offer our proposals for Recommended Wilderness Areas (RWAs) in the Pryor Mountains. In this letter we identify, map and describe areas in the Pryors which we believe meet the criteria for both the Wilderness Inventory, and for designation as Recommended Wilderness in the new CGNF Management Plan. These areas are consistent with the intent of the Wilderness Act.

We are enthusiastic about the opportunity the current Management Planning process provides to add needed recognition and protection to important wild areas in the Pryor Mountains. The areas described below all

1. appear to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable,
2. have outstanding opportunities for solitude and primitive and unconfined recreation, and
3. contain ecological, geological, and other features of scientific, educational, scenic, and historical value including rare plant and animal communities, and outstanding, scenic landscape features.

Holistic Vision and Unified Management Goals are Needed

The Pryors Mountains are an "island" range with approximately 154,000 acres of public land managed by Custer Gallatin National Forest (~ 49%), the Bureau of Land Management (~ 41%) and Bighorn Canyon National Recreation Area (~ 10%).² An amazing diversity of ecological and geological landscapes are included within this small area.

The boundaries between the lands managed by the three federal agencies have no correlation with ecological, geological or geographical boundaries. The various plant and animal species and their ecological communities are oblivious to the arbitrary agency boundaries. Similarly public recreational uses in the Pryors are not correlated with the areas managed by different agencies.

The Pryor Mountain landscape is an integral whole and needs to be managed as such. The three managing agencies need to have a common holistic vision of the desired future conditions in the Pryors. Goals and management policies need to be unified, consistent and coordinated. Collaboration with the Crow Tribe is also important.

The New CGNF Plan Can Match BLM and BCNRA Wilderness Vision for the Pryors

Thirty years ago (1986 Forest Plan) Custer National Forest designated the Lost Water Canyon Recommended Wilderness Area with 6,800 acres – only 9% of the 75,000 acres of Forest Service managed land in the Pryors. A lot has changed in 30 years. Public interest in the many unique values of this small and vulnerable island range has grown greatly.

Since 1986 BLM and BCNRA, considering the values of the Pryors landscape to the public now and into the future, have determined that 41,000 acres (more than 52% of the land they manage) should be managed to protect its wilderness values.² This land is designated variously as Recommended Wilderness Areas (RWAs), Wilderness

¹ The Pryors Coalition, Our Montana, Eastern Montana Chapter of the Montana Wilderness Association, Montana Wildlife Federation, Yellowstone Valley Audubon Society, Montana Wilderness Association, Beartooth Back Country Horsemen, Sierra Club Montana Chapter, Beartooth Recreational Trails Association.

² This includes land north of Helt, Gyp Springs, and Gypsum Creek Roads, east of Rail Bed Road, west of Highway 37 in BCNRA, and south of the Crow Reservation.

Study Areas (WSAs) and Lands With Wilderness Character (LWCs). BLM added the LWCs (11,500 acres – 18%) in their recent 2015 Resource Management Plan.

The CGNF land in the Pryors is as important as BLM and BCNRA land in terms of natural and cultural resources. It is just as important recreationally. CGNF land is also equally “wild” and worthy of protection. The minimalist 9% Recommended Wilderness in the 30 year old Forest Management Plan is a clearly not consistent with BLM’s and BCNRA’s (2017) Vision of the value of the Pryor Mountains, nor with modern and future public interest.

The current Forest Management Plan revision process is an opportunity for the Forest Service to join BLM and BCNRA in unified management of this small and vulnerable landscape with its deeply entwined ecosystems. CGNF can match BLM and BCNRA by designating at least 50% of the FS Pryors as Recommended Wilderness Areas (RWAs). Such designation will help preserve the Pryors landscape and provide substantial benefits for residents of the region now and in the future.

Opportunities for More CGNF Recommended Wilderness

Analysis of the CGNF landscape shows that more RWAs can appropriately be designated with lands that clearly qualify for Wilderness designation - and without serious disruption of existing uses of the land. The Pryors Coalition has identified 40,000 additional acres within CGNF that qualify for designation as RWAs. (See **Appendix Map: Wilderness in the Pryors.**) In our selection process we worked within the framework of the 2008 Travel Management Plan. We identified four “wild” areas, each well over the 5,000 acre minimum and suitable to be managed to preserve their wilderness character. These areas have either no designated public motorized roads, or only a few miles of dead end routes. (See **Appendix: Route Conversions for New Pryor Mountain RWAs.**)

Thus almost the entire extensive network of motorized routes in the Pryors is preserved. In particular this includes all the most popular and heavily used routes to the best views and through all the many landscape types. Our proposal also preserves all existing motorized loop routes.

The benefits of designating these motor-free RWAs are numerous, and complement the Forest Service’s multiple use and land use planning mandates.

Pryors RWAs Will Enrich the National Wilderness Preservation System

Another important consideration is that the proposed Pryors RWAs would substantially enrich the National (and Montana) Wilderness Preservation System by adding landscapes very different from any existing “typical” Montana Wilderness. Furthermore the four proposed RWAs differ greatly from each other ecologically and geologically. There is a great scarcity of protected Wilderness in central and eastern Montana (east of the Beartooths). This is significant both because the landscapes are very different and because present and future residents of these areas can benefit from ready access to such protected areas.

Ecological Integrity and Diversity – the 2012 Planning Rule

A primary goal of designating RWAs is to help protect, preserve and restore some of the Pryors’ special landscapes including its unique and diverse ecosystems and cultural values.

The 2012 Planning Rule significantly deepens and broadens the requirements of Management Plans regarding “*diversity of plant and animal communities.*” (See § 219.9 - especially the opening language and part (a).) Forest management in the past has focused intensely on the important issues of threatened and endangered species (T&E), species of concern (SOC) and hunted species. The 2012 Rule adds strong emphasis on ecosystem integrity and diversity and all species – not just T&E and SOC species.

“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

Plan components are required to “...maintain or restore the ecological integrity of terrestrial and aquatic ecosystems....”, and to “...maintain or restore the diversity of ecosystems and habitat types....”

Designation of the RWAs we propose would do a lot to satisfy § 219.9 (a) of the 2012 Planning Rule and is the best way to do so. We think it may be necessary to do so.

CGNF Assessment Report Supports Recommended Wilderness in the Pryors

CGNF's "**Nonforested Terrestrial Ecosystems Report**" by Kim Reid includes considerable discussion (including pages 3, 9-11, 20, 34, 49) of how the flora of the Pryor Mountain Landscape Area are unique in CGNF, in Montana and beyond. This report also explains why this unique flora is an important conservation concern.

The Pryors support numerous endemic species and peripheral populations of other species. As the report says (page 10):

"...areas of high endemism are important targets for conservation to prevent future extinctions."

"Peripheral populations of species and their habitats are often important areas for genetic divergence and speciation.... impart evolutionary potential and local ecological significance, thus heightening their conservation value."

"Conservation of important peripheral populations, despite the commonness of the species elsewhere, are generally considered by state natural heritage programs and the Forest Service when assigning conservation values."

Of course unique plant communities support correspondingly unique animal communities, though that is not discussed as thoroughly in the Report. Fauna ranging from insects to mammals and from large to small need to be considered.

The **Nonforested Terrestrial Ecosystems Report** ends with a section titled "**Key findings.**" The first two short paragraphs (page 77) of this section include:

"Special area designations [RWAs, WSAs, RNAs etc.] tend to reduce the amount of human-caused disturbances, so generally succession of the included non-forested vegetation tends to proceed toward late seral conditions in these areas (barring setbacks from natural disturbance). Wilderness areas, wilderness study areas, and research natural areas are generally managed to promote "natural" succession and disturbances."

"Because of a unique convergence of three floristic and related climatic provinces, the Pryor Mountains are considered a 'botanical hotspot', rich in species and community diversity. This area has been found to have high levels of endemism where plant species that are globally rare are found only in the Pryor Mountains and Bighorn Basin area."

These "key findings" of the Assessment Report strongly support our proposal for Recommended Wilderness within the Pryor Mountain Landscape Area. This reinforces the requirements of the 2012 Planning Rule § 219.9.

Noxious Weeds

Designated motor-free RWAs would help reduce the spread of noxious weeds. Currently in the Pryors, minor patches of noxious invasives are propagating at an alarming rate. This applies both to the distribution of several species, such as spotted knapweed, Canada thistle and hounds tongue, and to the number of different noxious weed species. Non-native weeds that are not designated as "noxious" are also a threat to the native plant communities. Vehicle traffic is a major vector for spreading weeds, and is the dominant vector for introducing new species. In particular, dead-end roads into otherwise unroaded areas can be thought of as "syringes" injecting weed seeds. Non-motorized, non-mechanized management areas will help reduce the spread of noxious plants. Known for its biodiversity, it is critical that the spread of noxious and invasive weeds be aggressively managed in the Pryors.

More Diverse Recreational Opportunities

Although this is not our primary objective, RWAs in the Pryor Mountain Landscape Area would provide a more balanced designation of non-motorized and motorized recreation opportunities. Currently CGNF's public documents and webpages don't even mention opportunities for hiking and similar motor-free activity in the Pryors. Designating and publicizing these RWAs and hiking routes within them, would show the Pryors have a lot of "something for everyone." There is an interesting and highly applicable sentence in the 1986 Custer NF Management Plan, "*These areas offer a unique opportunity for non-motorized recreation in a larger area that is mostly all available by vehicles.*" This sentence refers to the Cook and King Mountain areas of the Ashland District, but would be very appropriate for Pryor Mountain RWAs.

Economic Benefits to the Region

Protected areas like RWAs have been demonstrated to significantly benefit local economies. According to a February 2017 report from Headwaters Economics³, adjacency to federal public land, and especially *protected* federal public land, correlates strongly with economic success for Western counties over the last 45 years. The current imbalance of motorized vs. non-motorized recreation opportunities in the Pryors tends to exclude quiet recreationists. Wilderness areas will attract an increased number of quiet recreationists and therefore increase the volume and diversity of economic benefit to nearby communities. Adding motor-free recreation opportunities to the Pryors would increase the contribution of the Pryors to the quality of life for residents of all nearby communities. The Pryors are an easy day trip from the largest population center in Montana and many smaller communities in Montana and Wyoming.

Climate Change

The CGNF Climate Assessment Report documents the fact that temperatures throughout CGNF have increased over past decades and are predicted to continue to do so in the future. This, of course, has and will affect flora, fauna and their habitats. The report states, *“For example, rising temperatures have already increased ... competition between human and ecological needs, a pattern expected to continue in foreseeable climate scenarios (Schafer et al. 2014). Thus, as a public resource, demand may increase for the Custer Gallatin to provide ecological refugia as habitats are lost elsewhere.”* (pages 1&2) RWAs in the Pryors can help provide such refugia.

Pryor Mountain RWAs may be able to play several unique roles with regard to climate change. Elevation is a major determinant of habitats in the Pryors. Plant communities and ecosystems gradually change from the low elevation south of Big Pryor Mountain north up to the Big Pryor Plateau. The slope up Bear Canyon RWA to the Big Pryor RWA may be an “escalator” for species adjusting to climate change. The relatively short distances may allow less mobile species to migrate up elevation in ways not possible in other parts of CGNF. This may provide refugia for some species that could otherwise not adapt to changing climate.

The Bear Canyon and Big Pryor RWAs could be a great research laboratory for studying the ecological response to climate change including possible species migrations.

Bear Canyon Recommended Wilderness Area (RWA)

The 12,500 acre Bear Canyon road-free area encompasses most of the Bear Creek watershed on the south and west facing slope of Big Pryor and Red Pryor Mountains. Several forks of rugged limestone-cliffed Bear Canyon are included within 10,800 acres of Custer Gallatin National Forest and 1,700 contiguous acres are BLM managed land. Partly due to the elevation climbing from just over 5,000 feet to 8,600 feet in about 7 miles, this small area exhibits a wide range of ecological habitats ranging from arid semi-desert, with rare riparian areas in the canyons, to dense Douglas fir forest, and the sub-alpine plateau near the top of Big Pryor Mountain.

The Bear Canyon watershed, and other wild land in the Pryors, is outstandingly different from all currently designated or proposed Wilderness Areas in Montana – including the nearby Absarokee and Beartooth Mountains and all landscapes in western Montana. This area would do much to enrich the Wilderness system in Montana. The near complete watershed within this Bear Canyon road-free area is particularly significant.

Audubon Important Bird Area

The proposed Bear Canyon RWA includes approximately 1,400 acres (mostly in CGNF) of the Montana Audubon Society designated Bear Canyon Important Bird Area (IBA). Montana Audubon writes:

“The scenery and habitats are spectacular and make for a unique Montana setting reminiscent of the Desert Southwest.”

“Most of the canyon bottom is a mix of sagebrush/juniper and low desert shrubs. The upper reaches of the canyon contains a beautiful stand of narrow-leaved cottonwoods with a rich understory of shrubs. The surrounding slopes are a mix of Utah juniper, limber pine and sagebrush. This area is the only

³ <https://headwaterseconomics.org/wp-content/uploads/Print-federal-lands-performance.pdf>

place in the state with Utah juniper, and is the driest part of the state.”

“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 Gnatcatcher in among the handful of foothill canyons in the area that constitute the entire range 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.”

BLM cites the significance of the Audubon Bear Canyon IBA area with similar language in the 2015 Billings Field Office Resource Management Plan. (Appendix AB, page AB-22)

An interesting recent study⁴ shows that Sage Grouse migrate through the Bear Canyon watershed from nesting areas in and near the southern (BLM) part of the proposed RWA to summer range at the high elevations of the Bear Canyon and Big Pryor RWAs. It is reported that these migrations happen before the chicks are old enough to fly.

Montana Native Plant Society Important Plant Area

The entire proposed Bear Canyon RWA is within the South Pryor Mountain Important Plant Area (IPA) designated by the Montana Native Plant Society. This IPA was designated to recognize the approximately 29 distinct plant communities, endemic species, species of concern and peripheral populations in the small but diverse South Pryor Mountain landscape. All of the following, as described by the MNPS⁵, occur within the Bear Canyon watershed.

“Forests and woodlands dominated by limber pine occur on warm, often exposed, stony-soil slopes at or above 6,500 ft. Douglas-fir forests occur on slopes at 5,000-7,000 ft. Woodlands dominated by Utah juniper occur on shallow, calcareous soil of slopes and ridges at 4,000-6,000 ft. Limber pine-juniper woodlands are found on shallow, calcareous soils of slopes between 4,000 ft and 5,300 ft. Shrublands dominated by black sagebrush and big sagebrush occur at 4,200-6,700 ft on slopes, ridgetops and benches.... Idaho fescue grasslands occur above 8,000 ft on gentle slopes. Grasslands dominated by bluebunch wheatgrass and cushion plants are common on gravelly soils of low-elevation ridgetops and upper slopes.”

Archaeological and Cultural Values

From bottom to top the proposed Bear Canyon RWA has numerous, sensitive archeological and cultural sites that may be better protected with RWA designation. Preserving the quiet and solitude will preserve and enhance the value of the area as an ethnographic landscape.

Motor-Free Recreation Opportunities

The Bear Canyon area has particular value in providing opportunities for hikers and equestrians in a motor-free area. For people with only highway vehicles or hauling a horse trailer, it is one of the easiest to reach parts of the Pryors. Several hiking routes are only a few miles of good gravel road from the pavement. Yet these routes allow hiking in several different landscapes, and longer hikes through the motor-free area to higher elevations. Such easy to access hiking opportunities are scarce in the Pryors. Furthermore, some of these routes provide excellent hiking opportunities in the early spring and late fall (and sometimes even in the winter) when most other wildland hiking routes in the state are snowed in.

Wild and Scenic River

Bear Creek and its spectacular canyon should be designated as a Wild and Scenic River (WSR). These two designations, WSR and RWA, will enhance and reinforce each other.

⁴ Pratt, A. and M. Dillon. 2015. Seasonal space use of greater sage-grouse in the Carbon core area, Montana. Final Report. December 2015. Unpublished.

⁵ Kelsey, Newsletter of the Montana Native Plant Society, Volume 26, No. 1, Fall 2012, page 3

Big Pryor Recommended Wilderness Area (RWA)

Dramatically Different from Other Pryor Mountain Landscapes

The proposed 12,400 acre Big Pryor Recommended Wilderness Area differs dramatically from any other Recommended Wilderness in the Pryors including the BLM and BCNRA areas. There is considerable area of very dense Douglas fir forest on the steep north-facing slopes of Big Pryor Mountain. These ~ 2,000 feet high, heavily forested slopes help isolate the crown jewel of the proposed RWA – the Big Pryor Plateau.

Perhaps the most outstanding feature of the area is the expansive, sub-alpine Big Pryor Plateau. It is several thousand acres of gently rolling “prairie in the sky” – but with very different plant communities than the “real” prairie some 4,000 feet below. Ranging from 8,400 feet to top of the Pryors at 8,786 feet elevation this plateau seems another world from the arid deserts to the south, and the steep, thick forests to the north. In July the plateau is ablaze with wildflowers of innumerable colors.

A Botanical Special Place

In “*A Botanical Guide to Special Places in the Pryor Mountains*.” Jennifer Lyman, Ph.D., Kelsey Flathers and Simone Durney describe the subalpine plant communities as⁶

“dominated by cushion plants that are mat forming and of short stature like Phlox and Minuartia. When looking at these communities from afar they appear bare, but with a closer look at ground level you begin to see the high plant diversity below your feet. Flowering plants that you may see include: common yarrow, nodding onion, pasque flowers, wyoming kittentails, shooting stars, Howard’s alpine forget-me-not, mat buckwheat and sword townsendia. Sedges, like Carex, are also prevalent in a cushion community or subalpine meadow.... As you walk along the community the ground is slightly bouncy below each step because the top four inches of the soil horizon consists of organic matter, much of it still not completely decomposed.”

They found 47 different plant species in a small sampling area on the Big Pryor Plateau.

Some of the sage grouse in the study discussed in the section on the Bear Canyon RWA were found to summer on the Big Pryor Plateau.

Elk and Deer Habitat is Not Secure

Custer National Forest identified much of the proposed Big Pryor RWA as elk and deer habitat. Deer are frequently seen on and near Big Pryor Plateau, but elk have not been reported in the area recently (although elk are reported in the Punch Bowl and Roberts Bench areas to the northeast). One reason may be that the elk habitat in the FS Pryors does not currently meet the Hillis guideline of at least 30% secure elk and deer habitat, nor the Canfield recommendation for a road density of less than 1.0 mi/sq mi.⁷ Designation of the proposed Big Pryor RWA would considerably help to increase secure elk habitat. Of course this would also help protect habitat for many other plant and animal species.

Ethnographic Landscape

A significant part of this area is an important ethnographic landscape for the Apsaalooke (Crow). High ridges with big views such as the rim of the Big Pryor Plateau are important fasting sites for Apsaalooke. There are important archeological sites in the Big Pryor RWA. Designation of the Big Pryor RWA will help protect this cultural landscape.

A Premier Montana Hike

The short but steep hike from Tie Flat to Crater Ice Cave and the top of Big Pryor Mountain is currently the only Forest Service designated hiking route in the Pryor Mountains. It climbs through the old growth Douglas fir forest

⁶ <http://www.pryormountains.org/natural-history/botany/botanical-guide/>

⁷ It is puzzling that the 2008 Travel Plan FEIS reports only 26% secure elk habitat in the FS Pryors (page 143), but the Terrestrial Wildlife Assessment Report claims 34% (page 105). This is a drastic difference since there have been no changes in the authorized road network since 2008. In any case a Big Pryor RWA would increase elk security.

where striped coralroot orchid, *Corallorhiza striata*, and other wildflowers, grouse, squirrels and black bear may be seen. Finally it breaks into the open Plateau and the top of Big Pryor Mountain.

This is one of Montana's premier hiking trails, leading to the tenth most prominent vista in the entire state of Montana.⁸ From the highest points on Big Pryor plateau much of Montana and Wyoming can be seen – including East Pryor Mountain, the Bighorn Mountains to the southwest, the Wind River Mountains to the south, the Absaroka and Beartooth Mountains to the west, the “rest” of the Pryors on the Crow Reservation to the north and much of the plains of Montana and Wyoming.

Punch Bowl Recommended Wilderness Area (RWA)

Punch Bowl is unique

The Punch Bowl area, under the north face of East Pryor Mountain, is unlike any other area in the Pryors. The 8,670 acre proposed Punch Bowl Recommended Wilderness does not duplicate any other proposed wilderness on CGNF, BLM or BCNRA areas of the Pryors.

Different Climate

Jennifer Lyman, Ph.D, Kelsey Flathers and Simone Durney, write in “**A Botanical Guide to Special Places in the Pryor Mountains**”⁴:

“There are dramatic differences in temperature, sunlight, precipitation, and wind exposure on the northern and southern slopes of the Pryors.”

The average annual precipitation on the north face of the Pryors is 18-20 inches, compared with 7-8 inches in the arid south.

Botanically Different and More Diverse

Lyman, Flathers and Durney surveyed nine distinct plant communities in the Pryors ranging from the arid southern desert to the top of Big Pryor Plateau. At these nine sites they catalogued a total of 209 native plant species. The Punch Bowl plant community had, by far, the greatest species diversity of the nine sites with 78 species found in the survey plot. Of these 78, 32 species were found *only* at the Punch Bowl site. 22 more species were *only* found at Punch Bowl and at the riparian site along Crooked Creek. Lyman, Flathers and Durney wrote:

“The North Pryor region, in the Punchbowl area, offers a beautiful example of aspen forest encompassing an understory of native shrubs and forbs. The aspen stands open onto sagebrush meadows with views of the rugged limestone cliffs of the Pryor’s northern front.”

In 2008 Rocky Mountain Herbarium botanists discovered a population of Wyoming *Sullivantia* (*Sullivantia hapemania*) in upper Dry Head Canyon in the Punch Bowl RWA.⁹ The plants were found in “*cracks in the ceiling, walls, and on the floor of a dripping grotto, and wet cracks of limestone cliffs.*” According to the Montana Field Guide this Species of Concern “*is regional endemic known in Montana only from a few, clustered locations. It grows in small, fragile aquatic habitats that may be vulnerable to hydrologic changes from water development or diversion, or trampling.*” As far as we know the only other population of Wyoming *Sullivantia* in the entire CGNF is near Bass Creek on the north face of Big Pryor Mountain within the Big Pryor RWA. There is no *Sullivantia* in the BLM part of the Pryors. (It is found at Layout Creek Springs in BCNRA.) This is one more indication that Punch Bowl is different and deserves RWA protection.

Historic Elk Habitat

The Punch Bowl RWA is recognized by the Forest Service as historic elk¹⁰ and deer habitat. In recent years elk have increasingly been seen in the area. As mentioned for the Big Pryor RWA, elk habitat in the Pryors does not currently meet guidelines for secure elk and deer habitat. Designation of the proposed Punch Bowl RWA would considerably increase elk security in the Pryors.⁵ Of course this would also help protect habitat for many other plant and animal species.

⁸ <http://www.summitpost.org/montana-s-top-100-prominence-list/456618>

⁹ Kim Reid, private communication, 3/13/2017, and plant list by botanists Ron Hartman and Ernie Nelson

¹⁰ District Ranger David Schmid, “Forest Service acquires land in Pryor Mountains”, Billings Gazette 7/7/2005.

Ethnographic Landscape

The northeast “corner” of East Pryor Mountain is called Dryhead Vista by non-Indians. The Apsaalooke call this sacred place “Where They Saw The Rope.” This location is part of an important ethnographic landscape that would have enhanced protection within the Punch Bowl RWA.

Contiguous with BLM Land with Wilderness Character (LWC)

The SE “corner” of the Punch Bowl RWA has a common ~1 ¼ mile border with a BLM designated 2,873 acre LWC. (This LWC is contiguous with a BLM Wilderness Study Area and a BCNRA Recommended Wilderness.)

Wild and Scenic Rivers

Punch Bowl and Dryhead Creeks should be considered for Wild and Scenic River designation. WSR and RWA designations would complement each other.

Lost Water / Crooked Creek Canyon Recommended Wilderness Area

The minimalist 6,800 acre Lost Water Canyon RWA, designated in the 1986 Custer National Forest Management Plan, is a good start. But there seems little reason for the boundaries chosen for this tiny RWA. It needs to be expanded to include areas beyond the current boundary which are equally wild and in need of protection. These lands adjacent to the existing RWA are ecologically and topographically linked to the designated Lost Water Canyon RWA. A larger RWA will provide more effective protection of the landscape’s wilderness character and other resources. Cave Ridge, Island Ridge and Commissary Ridge and the intervening canyons should be added to the RWA.

Crooked Creek Wild and Scenic River

In 1989, Amendment #2 to the 1986 Custer National Forest Management Plan identified eight miles of Crooked Creek as “eligible” for Congressional designation as a Wild and Scenic River. Inclusion of Crooked Creek Canyon to the RWA will enhance both WSR and the RWA designations. This canyon is one of the most wild and scenic features of the Pryor Mountains. Crooked Creek Road is the “natural” and practical boundary to the expanded (14,400 acre) Lost Water Canyon / Crooked Creek Canyon RWA.

Important Plant Area

The entire 14,400 acre Lost Water / Crooked Creek RWA is within the Montana Native Plant Society designated South Pryor Important Plant Area. As discussed for the Bear Canyon RWA, this IPA was designated to recognize the numerous distinct plant communities, endemic species, species of concern and peripheral populations in the small but diverse South Pryor Mountain landscape. Designation of the expanded RWA will help protect the unique flora of the area and help prevent the spread of noxious weeds.

Cultural Importance to the Crow

The CGNF Assessment Report on Nonforested Terrestrial Ecosystems states (page 49):

“Commissary Ridge in the Pryor Mountains have been identified as a root-plant collection area for the Crow Tribe (bitterroot, sego lily, Indian turnip). Other plants there are edible, have medicinal uses, or industrial uses such as for tipi poles. The reddish clay ochre can be used for paint and chert that can be made into stone tools. The area has been described as “the commissary, the storehouse of life to the Crow Indians” (Nabikov et al., 1994).”

Seamless Management Between CGNF and BLM

The west to east CGNF / BLM boundary between Crooked Creek Road and Burnt Timber Ridge Road is 3 ½ miles long. This entire BLM / CGNF boundary is the north boundary of the BLM Burnt Timber Canyon WSA. North of this arbitrary boundary is NOT currently CGNF designated RWA (except for a very short fraction of a mile). Our proposed **Lost Water / Crooked Creek Canyon RWA** would make management consistent across this BLM / CGNF boundary. (Please see the map in the Appendix.)

There is a 1,000 acre strip of CGNF land between Burnt Timber Ridge Road and the CGNF / BLM boundary. Although this is smaller than the 5,000 acre minimum standard for stand alone wilderness designation, it is contiguous with the BLM Pryor Mountain Wilderness Study Area to the east. Since it is equally as wild as the adjacent BLM land it is obvious that it should be designated as RWA. As discussed earlier, management of the Pryors landscape should be seamless across the arbitrary agency boundaries.

Conclusion

We will appreciate careful consideration by the Planning Team of our proposals for RWAs in the Pryors. The Pryor Mountain RWAs discussed above, and shown on the map below, are an exciting opportunity to preserve ecological and cultural values, and also provide balanced motorized and motor-free recreational opportunities. We would be pleased to discuss these ideas further with any members of the Planning Team.

Sincerely,

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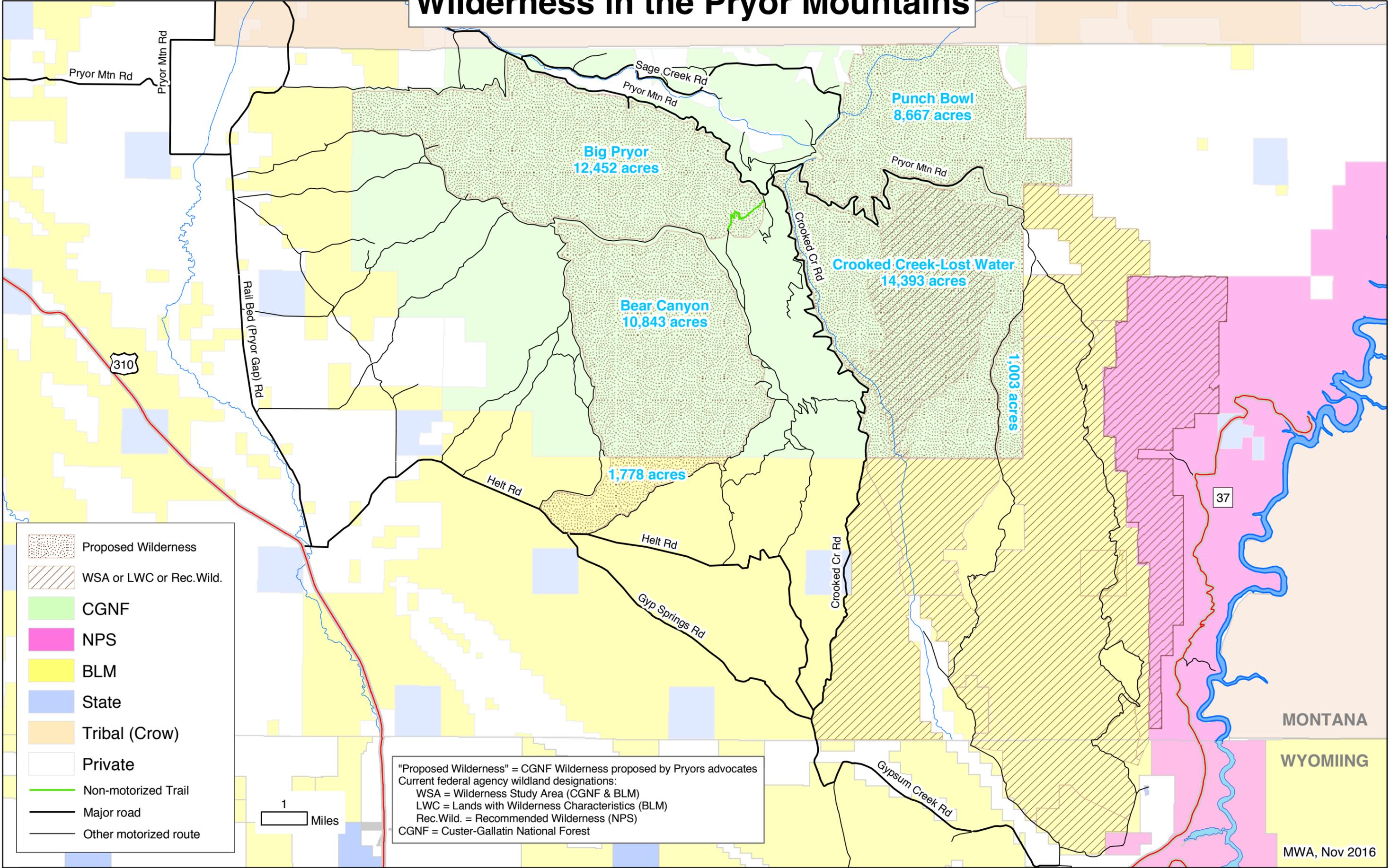
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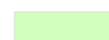
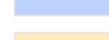
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Wilderness in the Pryor Mountains



-  Proposed Wilderness
-  WSA or LWC or Rec.Wild.
-  CGNF
-  NPS
-  BLM
-  State
-  Tribal (Crow)
-  Private
-  Non-motorized Trail
-  Major road
-  Other motorized route

"Proposed Wilderness" = CGNF Wilderness proposed by Pryors advocates
 Current federal agency wildland designations:
 WSA = Wilderness Study Area (CGNF & BLM)
 LWC = Lands with Wilderness Characteristics (BLM)
 Rec.Wild. = Recommended Wilderness (NPS)
 CGNF = Custer-Gallatin National Forest

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Appendix: Route Conversions for New Pryor Mountain RWAs

The Pryors Coalition et al. proposes four areas in the Pryor Mountains to be designated by CGNF as Recommended Wilderness Areas (RWAs). We hope they will eventually become Congressionally designated Wilderness Areas. The boundaries of these areas were designed within the framework of the 2008 Travel Plan. They are not completely ideal, but provide important habitat protection and quiet recreation opportunities.

By using motor-legal routes for most of the RWA boundaries, these RWAs would leave almost intact the current 124 mile network of motorized routes on the Forest Service part of the Pryors. In particular all the most popular motor-legal routes, including *all* the loop routes, are unaffected by our RWA proposal. There will still be ~ 10 legal routes to drive up to the Big Pryor Plateau.

But a few changes to the 2008 Travel Plan would be required. Below is a breakdown and prioritization of the motor-legal routes that we believe should be converted to motor free routes, i.e. hiking and equestrian trails.

It is surprising how few routes *must* be converted to motor-free routes to maintain the integrity of the four RWAs. Furthermore all these routes are dead-end routes. They are not parts of “loops.” Most are not heavily used and don’t go to any particular destination.

Motor-legal routes (2008 Travel Plan) that must be converted to motor-free hiking and equestrian routes to maintain the integrity of the RWAs.

RWA	Route Name	Number	Miles	Comments
Bear Canyon		None	0	There are no public motor-legal routes within the RWA.
Big Pryor		2095A	3.4	<i>Note that this route is not a “road.” It is a motorized “trail.”</i> This route into the heart of the RWA significantly impacts otherwise secure wildlife habitat as defined by the FS. It is not a heavily used route. It does not go to any particular destination.
Punch Bowl		2144 (part)	3.0	This segment extends NE from the junction of #2144 with #2097, the “Beaver Slide.” The FS authorized route #2144 ends 0.4 miles short of the FS/Crow Reservation boundary. This route also significantly impacts otherwise secure wildlife habitat.
Lost Water / Crooked Creek	Island Ridge	2093	1.6	This is a rather pointless and short “road to nowhere.” It is lightly used. It is part of a longer hiking route out to the end of Island Ridge.
	Commissary Ridge	2092	1.75 south end	This would leave the north 2 miles of #2092 and 0.95 miles of #2092C motor-legal and “cherry-stemmed” into the RWA. At one time the FS preferred Travel Plan alternative B left the last 0.75 miles of #2092 motor-free with the explanation: “ Non-motorized experience and cultural resources. The end portion of this system road would not be designated for public motorized use to provide multiple non-motorized recreation opportunities including hiking, vistas, and dispersed camping. This proposal would also reduce impacts to cultural resources.” (2008 TP FEIS C-18)
Total Miles			9.75	

Administrative Route in Bear Canyon RWA

In the NW “corner” of the Bear Canyon RWA an accommodation must be made for a 1 mile administrative route from Stockman Trail, #2850, to a cabin in section 10 used by the Loyning’s for their cattle grazing lease. This route is called “Bainbridge Loop,” route #2095, in FS files. It is not on the MVUM because it is designated for administrative use only. Probably the best arrangement is to “cherry-stem” the route into the RWA. The Big Springs area near the cabin is an important archeological site including a chert quarry.

Motor-legal routes (2008 Travel Plan) that it would be *desirable* to convert to motor-free hiking and equestrian routes to better protect cultural resources, wildlife habitat, and/or quiet recreation opportunities.

Listed in priority order.

RWA	Route Name	Number	Miles	Comments
Big Pryor	Shriver Peak	2088	1.8	<i>Note that this route is not a “road.” It is a motorized “trail.”</i> This route goes along the east edge of the plateau to the “peak” of Big Pryor Mtn. This edge and the peak are culturally important to the Crow – like Dryhead Vista. The first 1.3 miles of #2088 parallels motor-legal #2091 at a maximum distance of 0.25 mile. The “peak” at the end of #2088 would be accessible by an easy and flat ½ mile walk from #2091.
		2002A	1.15	These two pointless and little-used routes lead to, and thus degrade, the Crater Ice Cave Trail 0.4 mile from its Tie Flat trailhead. #2002A1 is an “extension” of #2002A.
		2002A1	0.2	
Lost Water / Crooked Creek	Commissary Ridge	#2092C #2092	0.95 2.0	This would eliminate the “cherry-stemmed” motor route into the RWA. This would make a “cleaner” RWA.
Total Miles			6.1	

Appendix: Pryor Mountain Wilderness Statistics

In the 1990s, the Bureau of Land Management (BLM) recommended nearly 22,000 acres of the Pryor Mountains for Wilderness designation. This is **35%** of the approximately 62,600 acres of BLM land in the Pryors.

Then in the 2015 Resource Management Plan BLM recognized that areas passed over in the 1990s should also be managed for their outstanding wilderness character. BLM designated more than 11,000 additional acres as Lands with Wilderness Character (LWC) increasing the BLM area of the Pryors to be managed as wilderness to over 33,000 acres – **53% of the BLM Pryors**.

Bighorn Canyon National Recreation Area has recommended 8,000 acres for Wilderness designation – approximately **half of the BCNRA land** that might be considered “in the Pryors.”¹³

In the 1986 Management Plan Custer National Forest (CNF) recommended only 6,800 acres of the Pryor Mountains for Wilderness designation. That is **only 9% of the 75,067 CNF acres in the Pryors**.¹¹

Tens of thousands of acres more of this special landscape on CGNF qualify for Wilderness designation. The minimalist 1986 designation by CNF is inadequate when compared with current BLM and BCNRA designations which show a more up to date understanding and appreciation of the natural and cultural value of Pryors.

The Pryors Coalition has identified an additional 40,000 acres of CGNF land in the Pryors which should have Wilderness designation. In the new Management Plan now being developed for the Pryors, Custer Gallatin National Forest has an opportunity to match BLM and BCNRA, creating a unified and holistic management vision for this special landscape, by designating these additional Recommended Wilderness Areas (RWAs).¹²

It is the responsibility of the Forest Service to recognize, respect and protect this vulnerable and irreplaceable landscape for the future.

¹¹ It is unclear why an additional 2,448 acres identified as “inventoried roadless” was not included in 1986.

¹² Note that these RWA designations would still allow abundant and diverse motorized routes throughout the Pryors.

Bureau of Land Management (62,600 acres total¹³):

BLM Designated WSAs:

Big Horn Tack-On	2,689
Burnt Timber Canyon	3,516
Pryor Mountain	15,590

Total BLM WSAs 21,795 acres

BLM LWCs: (designated September 2015)

Pryor Mountain Unit Tract 1	2,873
Pryor Mountain Unit Tract 2	497
Pryor Mountain Unit Tract 3	143
Pryor Mountain Unit Tract 5	512
Pryor Mountain Unit Tract 6	1,074
Pryor Mountain Unit Tract 7	327
Burnt Timber Unit Tract 1	703
Burnt Timber Unit Tract 2	5,375

Total BLM LWCs 11,504 acres

Total BLM 33,299 acres

Big Horn Canyon National Recreation Area: (~ 16,000 acres total¹²)

BCNRA Recommended Wilderness: 7,975

Total BCNRA 7,975 acres

Forest Service (75,067 acres total):

CGNF Recommended Wilderness:

Lost Water Canyon: 6,800

Total CGNF Rec. Wilderness 6,800 acres

Pryors Coalition Proposed CGNF Wilderness:

Lost Water – Crooked Creek Canyons	14,393
East of Burnt Timber Ridge Rd.	1,003
Punch Bowl	8,667
Big Pryor	12,648
Bear Canyon	10,843

Total PC Proposed (CGNF) 47,554 acres
(includes 6,800 acre CGNF Rec. Wilderness)

Pryors Coalition Proposed BLM LWC¹⁴:

Bear Canyon 1,778

¹³ This includes land north of Helt, Gyp Springs, and Gypsum Creek Roads, east of Rail Bed Road, west of Highway 37 in BCNRA, and south of the Crow Reservation.

¹⁴ Since this is under 5,000 acres, BLM can only designate this as an LWC if CGNF designates the Bear Canyon RWA.