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Forest Service
Attn: Forest Plan Revision
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Virginia Kelley, Forest Plan Revision Team Leader et al.,

The Pryors Coalition is a collaboration among a number of organizations and many “unattached” individuals who may or may not be associated with those organizations. Associated organizations include the Eastern Wildlands Chapter of the Montana Wilderness Association (EWC/MWA), Our Montana (OM), the Montana Wildlife Federation (MWF), the Yellowstone Valley Audubon Society (YVAS), and the Beartooth Back Country Horsemen (BBCH). 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.

We appreciate the opportunity to comment on the CGNF draft Assessment of Existing Conditions and draft Need to Change for Forest Plan Revision, important steps toward the new Management Plan for the Forest. Please note that our comments are almost exclusively about the Pryor Mountain part of Custer Gallatin National Forest (CGNF). Nevertheless some of our comments may be applicable more generally to other areas of the Forest.

The Pryor Mountain Landscape Area

We are pleased to see the Pryor Mountains designated as a distinct “Landscape Area” for this Forest planning process. The uniqueness of the Pryors – geographically, geologically, ecologically and culturally – certainly makes it an appropriate decision to recognize this area as a distinct Landscape. We believe a significant and important challenge for the Forest Service is to create a seamless strategy to conserve the Pryor Mountain Landscape considering its management is fractured among the FS, BLM, NPS the Crow Tribe, and private holdings.

The effectiveness and success of this designation will depend on the development of Desired Future Conditions and Management Direction specific to and appropriate for the Pryors.

Many times in the Assessment Reports the Pryors are lumped with the other “western” montane landscapes. e.g. “...*there are two distinct ecosystems within the plan area. The western side of the plan area is characterized by mountainous terrain, with high topographic relief... and includes... the Pryor Mountain Landscape...*” (Draft Terrestrial Wildlife Report, page 5) Except for the commonality of “*high topographic relief*” the Pryors are NOT similar to the other western landscapes in CGNF. Some of the significant differences are described on page 5 of the Draft Cultural and Historical Resources and Uses Report. In fact that Report (page 19) lumps the Pryors with the eastern districts. Some Reports describe the Pryors as “transitional.”

The Pryor Mountain Landscape Area needs to be considered independently of all the other landscape areas to develop an appropriate management Plan.

Assessment of Existing Conditions

Specialists’ Reports¹

CGNF staff have put in a lot of time and effort collecting and synthesizing information, and drafting the Assessment of Existing Conditions reports. We see much important information about the unique values of

¹ It is unfortunate when managing agencies schedule a 30 day public comment periods over the Christmas and New Year holiday season. Even without holiday interruptions, thirty days is insufficient time for people to study and respond to well over 1,300 pages of documents. In the time allotted we are unable to thoroughly study all the Specialists’ Reports included in this Assessment. But we have spent considerable time looking over the parts that mention the Pryors.

the Pryors ecologically (flora and fauna), culturally to Native Americans and more. This assessment provides a good foundation for a new and improved Management Plan for the Pryor Mountain Landscape Area.

We understand why the assessment was divided into twenty-five different reports for different topics written by appropriate specialists. Each report includes separate paragraphs for different areas of the Forest on each sub-issue and species etc. However this understandable and perhaps necessary approach also has a serious weakness. Information about a specific area such as the Pryors is fragmented and scattered throughout, within and among the 25 reports. Details about the Pryors are interspersed with topically comparable, but often unrelated details about very distant and geographically different areas. We have a picture of the elephant's leg in one report on legs, a picture of the elephant's tail in another about tails, and a picture of the elephant's trunk in yet another report. Nowhere do we have a picture of the whole elephant.

The Pryor Mountains – only 2 ½ % of the entire Custer Gallatin NF - are designated as a separate “Landscape Area” for Management Planning because they are very different from any other part of the Forest. One of the most outstanding features of the Pryors is the extreme diversity concentrated within such a small area. This diversity includes ecological diversity, and also diversity among many natural and cultural resources including ecosystems, archeological sites, modern Native American cultural landscapes, diverse recreation opportunities and more. All these different considerations are entangled with each other in the same small landscape. And this treasured landscape is only a daytrip from the largest population center in Montana. Within the life of the new Management Plan public activity in the Pryors will only continue to increase.

A Holistic Assessment of the Pryors is Needed

In order to develop an appropriate understanding of the Need to Change the Management Plan for the Pryors, a responsible Desired Future Condition, and appropriate Management Direction for the Pryors, a picture of the whole Pryors is needed. An additional step in the Assessment is needed to bring together all the pieces of information about the Pryors in one place where the Pryors can be seen as a whole with all the complex interrelationships. Without that holistic understanding of the Pryors landscape, appropriate management planning for the future will not be possible.

The numerous good Assessment Reports don't provide a holistic assessment of the Pryors in several important ways.

- Information about the 75,000 FS acres in the Pryor Mountain Landscape Area is scattered among information for 3-million acres of other, very different and distant landscapes - not collected together for easy understanding.
- Some important information characterizing the Pryors is lost in combination with the entire CGNF. For example: Ecosystem diversity and integrity need to be considered at the Landscape scale (or even smaller) rather than at the CGNF Plan Area scale.

The Draft Terrestrial Wildlife Report states (page 10), “*Between the Montane and Pine Savanna Ecosystems, the Custer Gallatin National Forest hosts a remarkable diversity of native terrestrial fauna. According to the Montana Natural Heritage Program website ... at least 79 mammal species, 262 bird species, 11 reptile species, 9 amphibian species, 17 fish species and 291 invertebrate species have been recorded in the plan area.*” This fails to indicate the diversity specific to the Pryors – e.g. that there are 208 species of birds listed for the Pryor Mountain area. This information and other similar information is not in the report. The same report lists the various bat species and where they are found in the CGNF Plan Area, but never notes that all but one species of bat ever found in Montana has been documented in the Pryors - a unique, or nearly unique assemblage in Montana.

- Information on different aspects of the Pryor Mountain Landscape Area is not integrated. e.g. It is difficult to understand relationships among issues relating to flora, fauna, cultural issues, recreation, etc.
- The Assessment Reports largely focus on the CGNF plan area - thus missing the fact that the Pryors are a single landscape that is artificially fractured into several management jurisdictions.

The FS, BLM, Crow and BCNRA Pryors are an integral whole that need to be managed as such. This is particularly significant due to the small area of this island range, and is a more serious issue in the Pryors than elsewhere in the CGNF. The FS Pryors “stand alone” from the rest of CGNF, but they do not stand alone from the rest of the Pryors.

For example: The Draft Terrestrial Wildlife Report includes, “*Small numbers [of Sage Grouse are] recently known to occur in the Pryor Mountains landscape.*” (page 80), and “*A small number of summering sage-grouse have been observed in the Pryor Mountain landscape. There are known active breeding areas near the Pryor Mountains, but they are all located entirely outside of the plan area.*” (page 81)²

Dismissing these known breeding areas as “*outside of the plan area*” is inappropriate. They are just barely outside the CGNF boundary on BLM land. (Might there be yet unknown breeding sites nearby on the Forest?) The rest of the story is quite remarkable. The Pratt and Dillon study showed that about a third of the grouse from the Bear Canyon and Gravel Pit breeding/nesting areas soon migrated to the top of Big Pryor Mountain for the summer season. We understand that these “migrations” happen before the chicks are old enough to fly and thus they probably walk some half a dozen miles (mostly on FS land) up from the nesting sites. Likely the walk is through the Audubon Important Bird Area (partly on FS land), through FS areas we propose for designation as Recommended Wilderness, to the top of Big Pryor where we propose more Recommended Wilderness. The grouse do not know where they cross from BLM to FS land.

Another document combining information about the Pryor Mountain Landscape Area from many specialists’ would be the best way to provide an integrated and holistic view of the whole Pryors. Such a document would also help the public understand the significance of the Pryors.

Ecosystem Integrity and Ecosystem Diversity and Threatened and Endangered species

We understand that the Specialists’ Assessment Reports need to include considerable information about each species listed or proposed as threatened and endangered, and other species of conservation concern. This is necessary to address sections §219.6 (b)(5) and §219.9 (b) of the 2012 Planning Rule. The Reports do this thoroughly. But we find the Reports to be very skimpy, at best, in addressing sections §219.6 (b)(1) and §219.9 (a).³ §219.9 (a) describes “*complementary*” requirement (to the species-specific mandate of part (b)) 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....*” (*Ecosystem integrity*), and

“*...maintain or restore the diversity of ecosystems and habitat types....*” (*Ecosystem diversity*)

The Draft Terrestrial Wildlife Report overwhelmingly focuses on threatened and endangered species, species of conservation concern, and hunted species. The Draft Forested Terrestrial Vegetation Report is almost exclusively about timber. Neither of these Reports (or others) address section §219.9 (a) of the 2012 Rule. An excellent exception is the Draft Nonforested Terrestrial Ecosystems Report prepared by Kim Reid. This report includes considerable information about the unique botanical biodiversity of the Pryors. This begins to address section § 219.9 (a) of the 2012 Rule.

The Draft Terrestrial Wildlife Report includes “*species of public interest*” which it defines as “*fish, wildlife, and plant species commonly enjoyed and used by the public for hunting, fishing, trapping, gathering, observing or sustenance, including cultural or tribal uses.*” (pages 4 & 5) The clear emphasis is on hunting, fishing and trapping, but the Report doesn’t get much past hunting. The public interest in “observing” needs much more emphasis. This includes bird, wildflower and butterfly watching (and

² The dismissive “small numbers” used twice in the brief mention in the Report also seems inappropriate for a species of concern like Sage Grouse.

³ In fact the Draft Terrestrial Wildlife Report twice cites section §219.6 (b)(5) of the 2012 Rule, and twice cites §219.9(c) which relate to threatened and endangered species and species of concern. It could also have cited §219.9(b) which has more detail on those species. However the Report never cites sections §219.6 (b)(1) or §219.9(a) which relate to ecosystems and their integrity and diversity – not just threatened and endangered species and species of concern.

photographing) and more. None are mentioned in the report. In fact there is considerable “*public interest*” in ecosystem integrity and ecosystem diversity.⁴

Suggested additions to the Assessment Reports

Despite not having had time to fully review the Assessment Reports we recommend several specific additions to the Assessment Reports:

- **Scientific Research and Education:** We suggest adding a clear statement of the importance of the Pryors for the overlapping areas of scientific research and education. For decades educators including Earth Science teachers in public schools, to geology, biology, and environmental science professors at both higher education institutions in Billings, and others from Wyoming and beyond have recognized the incredible scientific value for teaching and research found in the Pryor Mountains. The Pryors provide unusually diverse study opportunities in a small area.

The Pryors are an important area for scientific research and education.

The limestone underlying the Pryor Mountains supports a completely different geologic, faunistic and botanic history than the metamorphic granitic gneiss of the Beartooth Mountains.

An example: Botanists are well aware that populations of an incredibly restricted shrub, *Shoshonea pulvinata*, the Shoshone carrot, occur in the Pryors. This species is yet to be studied for its unusual reproductive strategies, plant medicinal potential, or its genetic systems that promote its sustained growth in the dry eroding limestones. And this is just one of the many unusual plant species that persist in this area that supports the northernmost example of Great Basin ecosystems.

The Pryors are an amazing, underappreciated treasure of the botanical, faunistic and paleontological natural world and deserve to be cared for and protected for research and education.

- **Audubon Important Bird Area (Bear Canyon IBA):** The 176 page Draft Terrestrial Wildlife Report which discusses birds throughout CGNF never mentions the Audubon Important Bird Area (IBA) in the Pryors (FS and BLM) or the compelling reasons it was designated. (By contrast the Montana Native Plant Society Important Plant Area (IPA) is well discussed in the Draft Nonforested Terrestrial Ecosystems Report.)

“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.”⁵

- **Elk in the Pryors:** Regarding elk in the Pryors the Draft Terrestrial Wildlife Report (page 102, emphasis added) includes, “*This isolated mountain range ... 60 percent would not be considered good elk summer range (class 0). **This may help explain why there are no resident elk in this landscape.***” There is no similar dismissive statement about other areas. In fact for the Ashland district, with “*...99 percent in class 0, which is not considered good elk summer range.*” The Report concludes, “*There is a growing elk population on this [Ashland] District; therefore, **the model results are probably not transferable to eastern Montana.***”

⁴ <http://www.pryormountains.org/natural-history/>

⁵ <http://www.pryormountains.org/wp-content/uploads/2015/10/Bear-Canyon-IBA.pdf>

The Western Field Ornithologists organization held their 40th annual conference and first in Montana in Billings in 2015. They took at least one field trip to the Bear Canyon IBA. “*Gray Flycatchers were confirmed in the Pryor Mountains where the species had been rumored to occur.*” (WFO) The only other Montana location where they are found is in the far SW corner of the state.

The FS has documented a different possible reason for current scarcity of elk in the Pryors. In the 2008 Beartooth District Travel Plan FEIS (pages 3-142,3), the FS identified and mapped 29,721 acres of elk habitat in the Pryors. At that time the Forest observed that “*elk have been documented within the Forest boundary in the past three years.*” Furthermore the Forest acknowledged that the Travel Plan failed to meet the Hillis guideline of at least 30% secure habitat or the Canfield recommendation for a road density of less than 1.0 mi/sq mi. For the Pryors the current values are less than 26% and 1.27 mi/sq mi.

Historically there have been elk in the Pryors. The small Pryors area will never make a large contribution to elk hunting opportunities in Montana. But hunting is not the only reason for restoration of the landscape. The question should be, “Should the Pryors have elk?” The FS should work to restore them to the area. (2012 Planning Rule section § 219.9 (a))

Need to Change

We understand that the Need to Change document is a key step between the Assessment and the rest of the process of developing the new Management Plan. Frankly we were expecting the document to be a definitive and specific statement about those adjustments and changes needed on specific landscapes.

There is little indication that it was informed by the extensive Assessment analysis of CGNF. The overwhelming majority of the document is a useful summary of many of the requirements of the 2012 Planning Rule (and a brief listing of other post 1986 changes in law, policy, regulation and Forest direction) which could apply to any National Forest in the country.

Thus we find very little information in the Need to Change document about what sort of changes CGNF foresees as needed in the new Management Plan. It is hard to see what direction CGNF is heading regarding new management direction – particularly for the Pryors.⁶ We hope to see more information in the final “Need to Change” document.

The Forest Plan and Site-Specific Decisions

One item listed as an “example” of things “that will *not* change in the revised Forest Plan” needs some further clarification:

It is stated that “a forest plan sets broad direction; it does not make site-specific decisions.” A common example given of this restriction on Forest Plans is Travel Plans, but this restriction applies to all site-specific decisions.

The draft Need to Change document ends this comment with the statement that, “The Forest Plan may set context for future travel planning efforts.” This sentence is very vague, can be interpreted in many ways, and needs to be clarified by CGNF. The point of the Forest Management Plan is that it *will* (not “*may*”) “set the context for future planning efforts.” Site-specific decisions are subservient to the Management Plan and must be consistent with it.

Furthermore the 2012 Rule makes it explicitly clear that prior site-specific decisions must be reviewed in the light of the new Management Plan, and revised in order to become consistent with it.⁷ In fact the 2012 Rule states that although site-specific changes are not made within the Management Plan, they may be made “contemporaneously” with it.⁸

⁶ We refer CGNF Planners to our April 5, 2016 letter in which we identify many needed changes in the new Management Plan for the Pryors. The need to change in the Pryors is clearly demonstrated by a comparison of the existing Management Plan for the Pryors, CGNF’s thorough Assessment of Existing Conditions Reports, and the 2012 Planning Rule.

⁷ “§ 219.15 Project and activity consistency with the plan.

(e) *Consistency of resource plans within the planning area with the land management plan.* Any resource plans (for example, travel management plans) developed by the Forest Service that apply to the resources or land areas within the planning area must be consistent with the plan components. Resource plans developed prior to plan decision must be evaluated for consistency with the plan and amended if necessary.” (2012 Planning Rule, emphasis added.)

⁸ “§ 219.2 Levels of planning and responsible officials.

(b)(2) ... Projects and activities must be consistent with the plan (§ 219.15). A plan does not regulate uses by the public, but a project or activity decision that regulates a use by the public under 36 CFR Part 261, Subpart B, may be made contemporaneously with the approval of a plan, plan amendment, or plan revision.” (2012 Planning Rule, emphasis added.)

Most of the draft Need to Change document explains ways new and revised Management Plans *need to* differ from the older Plans due to the new 2012 Planning Rule requirements. This implies a high probability of substantive changes to the Plan and a consequent likelihood of needed amendments to some site-specific decisions.

We believe that the sentence, “*The Forest Plan may set context for future travel planning efforts.*” is in conflict with the 2012 Planning Rule. At best it does not adequately communicate the 2012 Rule requirements regarding site-specific decisions. The drafters of the 2012 Rule clearly set the stage for the possibility, if not the likelihood, that the new Plan might require amendment of previous site-specific decisions.

- A Hypothetical Example:

The 2012 Planning Rule differs from previous planning rules (and previous Management Plans) in its increased emphasis on “*provid[ing] 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.*” and “*maintain[ing] or restor[ing] the diversity of ecosystems and habitat types throughout the plan area.*” (§219.9 Diversity of plant and animal communities.) A revised Management Plan based on this Rule will require review of prior site-specific decisions including, for example, grazing policies. This might, or might not, lead to amendments to previous decisions perhaps adjusting such things as the intensity or timing of grazing in specific areas.

- Another Example:

During the Beartooth District Travel Planning process the Pryors Coalition and others proposed designation of several motor-free conservation areas in the Pryors. Custer NF chose not to consider that option at that time. The Forest said that that kind of designation was more appropriate to consider in Management Planning.⁹ We consider that an implicit commitment by the Forest to seriously consider such designations in the current Management Planning process. Furthermore the 2012 Planning Rule mandates consideration of special designations such as Recommended Wilderness.¹⁰

Thus the 2008 Travel Plan for the Pryors is based on a Management Plan that (according to CNF) did not permit consideration of motor-free areas. The new Management Plan could easily – and we believe should – include such designations¹¹ which might likely trigger the 2012 Rule mandated reevaluation and amendment of some prior site-specific resource plans.

⁹ “2.6 ALTERNATIVES CONSIDERED BUT DROPPED FROM DETAILED ANALYSIS

2.6.1 LAND ZONING

The public proposed concepts for zoning motorized and non-motorized use on the Beartooth Ranger District to reduce user conflicts. ... proposals suggested identifying Riding and Hiking areas, “quiet areas”, or nonmotorized enclaves in the Pryor Unit. Zoning areas by type of use or similar management prescription is more appropriate for land management planning. This analysis is largely focused on the designation and use of routes (roads and trails), rather than prescriptive land use direction that would require a significant amendment of current Forest Plan land use direction which is beyond the scope of this analysis.” (2008 Travel Management Plan FEIS 2-20)

¹⁰ “§ 219.6 (3)(b) *Content of the assessment for plan development or revision.* In the assessment for plan development or revision, the responsible official shall identify and evaluate existing information relevant to the plan area for the following:

15) Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.” (2012 Planning Rule, emphasis added.)

“§ 219.7 **New plan development or plan revision.**

(c) (2) In developing a proposed new plan or proposed plan revision, the responsible official shall:

(v) Identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.” (2012 Planning Rule, emphasis added.)

¹¹ Wilderness designations in the Pryors would also do much to satisfy other requirements in the 2012 Planning Rule.

It would be an unfortunate bureaucratic predicament if several motorized routes were designated in 2008 due to the decision not to consider motor-free areas at that time, and now in 2017 motor-free designations are considered precluded due to those motorized routes. That trap clearly violates intent of the 2012 Planning Rule in which site-specific decisions are subservient to Management Planning.

Current Plans “Functional” Yet Dated

In trying to understand what CGNF is thinking about how the new Management Plan may differ from the old one we are trying to interpret CGNF’s conclusion that “... the current plans are functional yet dated ...”¹²

If this means that the current Plans are basically “OK,” but need a little tinkering, we emphatically disagree – at least for the Pryors. We suspect that CGNF also disagrees with this interpretation based on the extensive discussion in the draft Need to Change of the many ways the old Plans are inconsistent with the 2012 Planning Rule. This statement in the draft Need to Change document should be clarified.

In any case, we agree that the Management Plans are “dated.” The Forest Service, the landscape and the public have changed greatly in the last 30 years – and will change much more in the next 30 years. At least in the Pryors the Plan needs substantial updating and revision to guide Forest management in “*caring for the land and serving the people*” into the future.

Needs to Change in the Management Plan for the Pryors

The following is a summary of some “needs to change” we identified for the new Management Plan for the Pryor Mountain Landscape. (More detail is included in our April 5, 2016 letter.) We arrived at these after consideration of the Direction in the 1986 Custer National Forest Management Plan for Management Areas in the Pryor Mountains, and requirements of the 2012 Planning Rule. We believe corresponding changes in Desired Future Conditions and management direction can help achieve and maintain the characteristics we all value in the Pryors.

- 1986 MP rarely mentions the Pryor Mountains. Little in the Management Area direction was designed for the unique Pryors. As a designated Landscape Area in the new Management Planning process, the Pryors will need a Desired Future Conditions statement and management direction specific to the Pryors.
- In the 1986 Management Plan 80% of the Pryors are designated Management Area B, D, or G which strongly emphasize commodity extraction – “*intensive*” grazing, timber and minerals. The 2012 Rule emphasis on ecosystem diversity and ecosystem integrity requires corresponding changes in management direction. See 2012 Rule §219.8 (a) and §219.9 (a).
- 1986 Management Plan has direction for protection of threatened and endangered species, and certain “*selected species*” (i.e. a few hunted species in Management Area D). But the 2012 Rule (§ 219.9) asks for more: “*a complementary ecosystem and species-specific approach to maintaining the diversity of plant and animal communities and the persistence of native species... 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....*” This will require changes in management direction.
- There is no mention in the 1986 Management Area direction of the importance of any part of the Pryors as a Traditional Cultural Landscape for the Crow or other Native American tribes. Recently Custer NF has made welcome efforts to protect the Dryhead Overlook area (“Where they saw the rope”). The importance of this area is appropriately described in Assessment Reports. The Assessment report quotes Deaver and Koistra-Manning, “*The significance of the [entire] Pryor Mountain Unit to the Crow cannot be overemphasized....*” The new Management Plan needs to address this issue – and for more than just Dryhead Overlook.

¹² Need to Change document, page 1, emphasis added.

- In 2008 many people requested designation of motor-free areas (or recommended Wilderness areas) in the Pryors. Custer NF chose not to do so at that time because it would have required amendment of the 1986 Management Plan. CGNF must address this public request in the new planning process. 2012 Rule, §219.7 (c)(2)(v). Such designations would also go a long way toward maintaining and restoring ecosystem integrity and ecosystem diversity. §219.9(a)
- We have not found any mention of drones¹³ in the Assessment or Need to Change documents. Both in the Pryor Mountains and the rest of CGNF drones are a serious threat (a stressor) to many fundamental values of National Forest land. They can harass wildlife, interfere with quiet enjoyment of the solitude, and disrupt areas of cultural ceremonial significance to Native Americans. (This issue was not included in our April letter.)

The FS uses the Recreation Opportunity Spectrum (ROS) as a useful way to quantify opportunities for motorized and non-motorized recreation. The Semi-Primitive Non-motorized (SPNM) class constitutes only 38% of the FS Pryors (Draft Recreation Settings, Opportunities, and Access Report, page 8). This SPNM class is also a good surrogate for secure wildlife habitat (elk and deer etc.) since the definitions used by the FS are very similar – ½ mile or more from a motorized road or trail. The use of drones can invalidate both definitions. Thus drones threaten to drastically reduce both the percent of the Pryors in the non-motorized spectrum class, and the amount of secure wildlife habitat. This is especially true in the Pryors since the SPNM ROS (and secure habitat is fragmented into small areas. (See Draft Recreation Settings, Opportunities, and Access Report, Figure 6, page 45.)

We do not know what regulatory tools are available to Forest managers to deal with this new and rapidly increasing threat. But we think this issue must be addressed in some way in the new Management Plan. Restricting drones to within, for example, 600 feet of a motorized route would do much to limit the ROS and secure habitat problems. Some other problems with drone use may require other policies.

- Nowhere in the 1986 Management Plan is there any mention that the Pryors are “*scenic*.” This must be addressed in the new Management Plan. 2012 Rule §219.8 (b)(2) and §219.19 (definition of “*scenic character*”).
- There is very little mention in the 1986 Management Plan of public activity or “use” (including recreation) in the Pryors. Many sections of the 2012 Rule (including §219.8 (b)(2)) indicate that this must be addressed in the new MP.
- The word “*sustainability*” appears frequently in the 2012 Rule. §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.*” The new Management Plan must address these issues.
- The 2012 Rule clearly puts a constraint on multiple use including all forms of recreation. Section “§219.10 Multiple use” begins “*While meeting the requirements of §§219.8 and 219.9...*” These two sections are all about “*social, economic, and ecological sustainability*” and “*maintain[ing] or restore[ing] the ecological integrity of terrestrial and aquatic ecosystem...*” This needs to be addressed in the new Management Plan.
- 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.

¹³ This important statement is on page 5 of CGNF,s Need to Change document. It applies to drones. “*There is a need for plan direction to guide the management of new and emerging technologies that may affect recreation opportunities and build in enough flexibility in the Forest Plan that new technologies can be addressed. Advances in technology have greatly impacted the recreation resource in the past 20 years.*”

We thank the CGNF Planning Team for carefully considering our recommendations on the **Draft Assessment Report of Ecological, Social and Economic Conditions on the Custer Gallatin National Forest**, and **Draft Preliminary Need to Change the Existing Custer and Gallatin Forest Plans**. We look forward to your response to these suggestions.

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