

Custer Gallatin National Forest
Attn: Forest Plan Revision
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The Pryors Coalition and partner organizations¹ welcome the opportunity to comment on the Draft Revised Forest Plan and Draft Environmental Impact Statement for the Custer Gallatin National Forest.

The Pryors Coalition is a collaboration among a number of organizations and many concerned individuals who may or may not be associated with those organizations. The defining characteristic of Pryors Coalition and partners (organizations and individuals) is a strong desire to preserve this very special and vulnerable landscape for the future.

Our comments focus primarily on the Pryor Mountain geographic area of Custer Gallatin National Forest (CGNF). Nevertheless some of our comments may be applicable across the CGNF. We have carefully studied the Draft Plan and DEIS — including forestwide provisions relevant to the Pryors and specific sections on the Pryors.

We are pleased with the recognition of the cultural and ecological significance of the Pryor Mountains in the Draft Plan including the following statements:

The Pryor Mountains contain significant spiritual, traditional use, and ceremonial use sites for many Tribes including the Northern Cheyenne, Crow, Shoshone-Bannock, and Eastern Shoshone Tribes. It is considered a traditional cultural landscape integral to the maintenance of on-going traditional cultural practices of the Crow.

And:

The national forest portion of the Pryor Mountains contains a unique and diverse assemblage of botanical resources and plant associations within a relatively small area. The Pryor Mountains are important for scientific study and education. Due to the exceptional diversity in a small area, many researchers and educators in earth sciences have recognized its scientific value. Because of a unique convergence of three floristic provinces (Northern Great Basin, Middle Rocky Mountains, and Northern Great Plains), the Pryor Mountains are considered a “botanical hotspot,” rich in species and community diversity. More than 400 plant species can be found here. Many rare plant species in the Pryor Mountains are associated with the Madison limestone geology of the area. (Underline emphasis added. Draft Plan, pages 147,8) (more in footnote²)

The 2012 Planning Rule (§ 219.9) directs that new and revised Forest Plans maintain or restore the integrity and diversity of ecosystems and habitat types in the plan area. Unfortunately most of the plan alternatives, including the proposed alternative, do not adequately address the preservation and restoration of the important values of the Pryor Mountain landscape described above.

A. Pryor Mountain Recommended Wilderness Areas (RWAs)

The “range” of alternatives for RWA designation in the Pryors is severely skewed. There are effectively only two alternatives for Pryor Mountain RWA designation in the Draft Plan: Alternatives A, B, C, and E (all with negligible RWA designation), or Alternative D. (See Table 1) Alternatives A, B, and C propose a single, minimalist, token RWA. Only alternative D proposes responsible protection of the ecological and cultural values identified by CGNF in the quotes above. Alternative D is a moderate proposal of four RWAs that will help preserve the unique

¹ Our Montana, Montana Wildlife Federation, Montana Wilderness Association, Beartooth Back Country Horsemen, Great Old Broads for Wilderness, Bozeman Chapter, Sierra Club.

² Additional statements are found elsewhere including page 151 of the Draft Plan. (Underline added for emphasis.) “*The Pryor Mountain region is ecologically diverse and a concentrated area of high plant endemism. On National Forest System lands are 42 occurrences of 12 regional endemics only found in south-central Montana, in and near the Pryor Mountains, and adjacent Bighorn Basin in Wyoming... areas of high endemism, such as the Pryor Mountains, are often important targets for conservation to prevent trends to future extinctions.*” And “*The Pryor Mountains is also an area of concentrated occurrences of peripheral plant species found at the margin or edge of the species’ distribution range. Occurring on National Forest System lands are 47 occurrences of 16 peripheral plant species. ... Distinct traits found in peripheral populations may be critical to the species, allowing adaptation in the face of environmental change.*”

ecological values of the Pryors, while retaining almost all of the many, currently authorized, motorized routes and other uses.

Table 1: Recommended Pryor Mountain Wilderness by Alternative

| Alternative | E | A | B | C | ? | D | ? |
|---|----------|----------|----------|----------|----------|----------|----------|
| RWA Acres | 0 | 6,804 | 6,804 | 6,804 | ? | 43,861 | ? |
| % of Forest (75,067 acres) | 0% | 9% | 9% | 9% | ? | 58% | ? |
| % of Wilderness Inventory (61,014 acres) | 0% | 11% | 11% | 11% | ? | 72% | ? |

Frequently a DEIS includes two alternatives in which many “extreme” ideas are gathered. Their function is to demonstrate that these ideas were considered. In practice, these alternatives are generally perceived as outliers and have little impact on the final plan. We hope this is not the situation with Alternative D in this Draft Plan, and that the final decision will include the Pryors RWAs in Alternative D.³

1. Wilderness Area Analysis⁴

Each proposed RWA must be evaluated separately on its own merits, but some comments regarding CGNF’s wilderness analysis apply to more than one of the four Pryors RWAs proposed in Alternative D.

The unique ecological and cultural values of the Pryors were described with enthusiasm in the Draft Plan (page 147 and quoted above). Additional enthusiastic language regarding botanical resources is found in section 3.4.7 Plan Components – Terrestrial Vegetation (page 151).

In striking contrast, CGNF statements in the DEIS Wilderness Area Analysis⁵ for Alternative D are mostly tepid and devoid of enthusiasm regarding the ecological and wilderness values of the Pryors. The tone of these CGNF Wilderness Analysis tables appears to emphasize reasons, sometimes weak, *not* to designate RWAs, and to deemphasize, or not even mention, reasons *for* designating RWAs.

For example, there is no mention in these Wilderness Analysis tables of the “...*unique and diverse assemblage of botanical resources and plant associations...*” or the “*ecologically diverse and a concentrated area of high plant endemism*” or “*concentrated occurrences of peripheral plant species,*” or the Pryors’ “... *important[ce] for scientific study and education*” as elaborated in the quotation above. There is no mention of the Montana Native Plant Society Important Plant Area, or of the Montana Audubon Important Bird Area – or the reasons they were designated. There is no mention of the fact that Big Pryor RWA is potential secure elk and black bear habitat. There is no mention of the sage grouse that nest near Helt Road and seasonally migrate, with chicks, up through the Bear Canyon watershed to summer on top of Big Pryor Mountain within both the Bear Canyon and Big Pryor proposed RWAs.

There is no mention in CGNF Wilderness Analysis that the Pryors landscape and ecosystems are of types that are greatly underrepresented (or *not* represented) in the National Wilderness Preservation System.

2. Bear Canyon and Big Pryor RWAs:

a) Proposed Action

CGNF’s Proposed Action (January 2018, Appendix D, page 45-49) included a “wilderness evaluation” for the entire 41,976 acre “PRYORS_9 polygon” as a single unit including most of Big Pryor Mountain. The proposed 10,366 acre Bear Canyon, and 12,737 acre Big Pryor Mountain RWAs are respectively only one-quarter and one-third of this large polygon. As CGNF reported, these two areas are “*notably less developed*” (page 45) than the rest of the polygon. The Pryors Coalition proposed these two RWAs because they are the core remaining wild areas on Big

³ Note that some other geographic areas of CGNF already have Congressionally designated Wilderness Areas. In those areas RWAs proposed in the Forest Plan would be *additional* recommended Wilderness. In the Pryors there is currently *no* Congressionally designated Wilderness. Thus Alternatives A, B, C, & E probably mean there will be little or no designated Wilderness in this special area — ever.

⁴ Also see our comments on the Proposed Action in our February 28, 2018 letter, including Appendix V which reproduces our letter of April 13, 2017.

⁵ DEIS, Volume 2, Appendix D, pages 168-175, and “Effects of Alternative D” RWAs, DEIS, Volume 1, page 827–833.

Pryor Mountain. The overall “wilderness evaluation” of the large polygon does not accurately represent the two smaller areas proposed for RWA designation.

As stated in our February 28, 2018 comment letter on the Proposed Action, these two proposed RWAs “*need to be evaluated individually.*”⁶ A fresh and careful new analysis is needed, independent of the PRYOR_9 polygon evaluation. Instead CGNF has extracted information about the two proposed RWAs⁷ by selective cut-and-paste from the PRYOR_9 polygon evaluation. This leads to inaccuracies, and incomplete and misleading information.

The Wilderness Analysis in the DEIS does not provide reliable or sufficient information for decision makers to understand the full importance of designating the proposed Pryors RWAs.

b) Description of the geography, topography, and vegetation

The same single sentence from the PRYOR_9 polygon evaluation is copied into both the Bear Canyon and Big Pryor RWA evaluations:

The “... area is generally naturally appearing consisting of open sage covered slopes at the lower elevations, timber covered slopes at mid to upper elevations and large expanses of open meadow/high elevation grass at the upper elevations.”

This sentence makes it sound like the Bear Canyon and Big Pryor RWAs are pretty much the same. Nothing could be further from the truth. The Pryors are famous for extreme topographic and vegetative variation in a small area.

Almost all of Bear canyon RWA has a southern aspect and rises from lower elevation, arid near-desert, to just barely reach the sub-alpine plateau. Only a small percentage of the area is forested. The addition of a very brief mention of Bear Canyon itself helps only a little.

Big Pryor RWA has no low elevation arid landscape, and essentially no southern exposure. Instead a large area is subalpine plateau above 8,000 feet elevation. It also has a large area of heavily forested north facing slopes. A large canyon in Big Pryor RWA is not mentioned. The above quoted sentence is the entire description of Big Pryor RWA.

CGNF’s simplistic geographic description of the two areas utterly fails to capture the excitement of these areas that are strong reasons for RWA designation. The description fails to indicate the dramatic variation in ecosystems within and between the two areas.

c) Description of the wilderness characteristics: Solitude

The wilderness evaluation in the Proposed Action for the PRYOR_9 polygon includes:

“Most of the area provides for low levels of solitude because of the existing roads and motorized trails that run along the ridges between the canyons and across the top of the mountains.”

This blanket assertion is debatable for many parts of the 42,000-acre polygon. Yet this sentence is simply copied into the Draft Plan DEIS wilderness evaluation for the Big Pryor RWA where it is simply false. Neither Big Pryor nor Bear Canyon RWA are affected by any “*roads and motorized trails that run along the ridges between the canyons*” because there are none.

The Draft Plan DEIS Wilderness Analysis for the Bear Canyon RWA states:

“...opportunity for solitude ... diminishes in areas closer to the all vehicle trails adjacent to boundaries.”

All these motor routes are outside the proposed RWAs. Forest Service policy encourages using easily locatable features like motorized roads or trails for RWA boundaries. It is disingenuous to claim these boundary routes degrade the RWA.

Of course there are boundary effects in “small” RWAs. It should be expected that unique and “small” island ranges like the Pryors would have unique and “small” Wilderness Areas. But they are twice the minimum 5,000-acre size

⁶ The same point was made in the Pryors Coalition’s “Supplementary Wilderness Inventory Comments” (8/25/2017, page 3) and reproduced as Appendix VI of our (2/28/2018) comments on the Proposed Action: “*To appropriately consider this proposal ... an analysis of that area by itself should be completed.*” (emphasis in the original)

⁷ March 2019, Draft Plan, DEIS, Volume 2, Appendix D, pages 168-171

specified in the Wilderness Act.

Summary: All four proposed Pryor RWAs provide abundant opportunities for solitude. CGNF’s negative qualifications are inappropriate.

d) Description of the wilderness characteristics: Natural Quality

The Proposed Action Wilderness Evaluation for the PRYOR_9 polygon (and others) includes quantitative data about “vegetation condition”:

Table 2: Excerpt from Wilderness Evaluation for PRYOR_9 polygon. (Proposed Action, Appendix D, page 46)

| Question | Information |
|--|--|
| Vegetation Condition Class – Percent departure from historic vegetation: | 5% of acres classified as very low (0-16%) departure from historic vegetation. 25% of acres classified as low to moderate (17-33%) departure from historic vegetation. 55% of acres classified as moderate to low (34-50%) departure from historic vegetation. 15% of acres classified as high (67-83%) departure from historic vegetation. |

This is some sort of “average” over 42,000 acres of ecosystem diversity from arid semi-desert to sub-alpine plateau, over nearly 4,000 feet elevation range, and including dry sun-warmed southern exposure and dense, wet forests with northern exposure. We see no reference for the source of this data. The DEIS does not report when or how the data was collected. Without knowing the nature of the “departures” or which parts of the 42,000 acres had more, or less, departure, this information is of little value for evaluating wilderness designations.

It seems that this data on “departure from historic vegetation” is used by CGNF only for wilderness evaluation. It doesn’t appear anywhere else in any documents released by CGNF since the beginning of the Plan revision process. If this data is considered useful in evaluating potential wilderness designations, it should also be valuable in the other parts of the planning process.

The negative tone of this “departure from historic vegetation” language is copied into the Wilderness Analysis in the Draft Plan DEIS – but without any numerical data. For example:

Natural Quality – More than half of the area is classified as in departure from historic vegetation conditions. Due to grazing and the lack of natural fire⁸, ecological conditions that would be associated with the area without human intervention may be limited. (Bear Canyon RWA, and almost the same words for Big Pryor RWA. pages 168, 170)

These statements are apparently intended to disqualify the areas for RWA designation. We note that the criteria for Wilderness designation is an *appearance of naturalness* – not whether botanists can detect grazing impacts — and that grazing is permitted in Wilderness areas. We also note the CGNF analysis in the DEIS does not indicate the degree, locations or character of the departures from historic vegetation conditions.

If the departure from historic vegetation conditions is significant, that is evidence that past Forest management has not preserved the ecological integrity and diversity of the landscape. Management changes are therefore needed.

We commend CGNF’s statement that, “*Recommended wilderness areas are ... important for species diversity, protection of threatened and endangered species, protection of watershed, scientific research, and various social values.*” (DEIS, Volume 1, page 813)

The “*departure from historic vegetation conditions*” does not preclude designation of the Bear Canyon and Big Pryor RWAs since they both satisfy the criteria in the Wilderness Act as acknowledged by their inclusion in Alternative D. In fact RWA designation would help restore historic vegetation conditions, and help achieve desired conditions for ecosystem integrity and diversity – for both flora and fauna.

⁸ This factor seems irrelevant to Bear Canyon RWA, which has little forest to burn.

2. Comments on Specific Pryors RWAs

a) Bear Canyon RWA (DEIS, Volume 2, pages 168,9)

CGNF continues to imply that grazing infrastructure is significantly damaging to wilderness character. But there are only seven water developments in this 10,366-acre area, and most are close to the Bear Canyon RWA boundary roads. They could easily be excluded from the RWA by very minor boundary adjustments. The same is true of the minimal 2.5 miles of fence – not much for 10,366 acres. The interior of the RWA is undeveloped. Since cattle grazing is permitted in Wilderness, the presence of minimal and unavoidable disturbance associated with grazing should not be used to disqualify an area from RWA designation.

Under “current uses” CGNF reports there are no trails in the area. There are no motorized trails, or *designated* motor-free trails, but CGNF neglects to mention the considerable use of several *undesigned* hiking trails that *should* be designated. CGNF writes, “*This area has opportunities for unconfined and primitive recreation, however much of the terrain is very rugged.*” “*Ruggedness*” does not detract from “*opportunities for unconfined and primitive recreation.*” (A similar disparaging statement is in the Big Pryor RWA analysis table.)

Summary: The Bear Canyon RWA in Alternative D is clearly an outstanding opportunity for Wilderness designation in the Pryors.

b) Big Pryor RWA (DEIS, Volume 2, pages 170,1)

CGNF cites “*numerous abandoned mine sites*” implying a degradation of wilderness character. The language is very misleading. There are no mines – abandoned or not – in the proposed Big Pryor RWA. There are a number of very old, quite small, surficial prospecting scars. There are perhaps a couple dozen⁹ such scars within the proposed Big Pryor RWA – depending on exactly where the RWA boundaries are located. The total area of these scars is less than one acre of the 12,737 acre proposed RWA. The total area is probably no more than ½ acre, but they are so unimportant that they are not worth surveying and measuring. They are naturally re-vegetating.

One of the “Analysis Criteria” in the table addresses the “ability to protect and manage the area.” CGNF’s response¹⁰ is almost entirely irrelevant to the question. Instead there are statements about “*motorized and mechanized recreation uses [that] would no longer be suitable.*” These claims are overstated and inaccurate:

- CGNF reports this area includes 4.8 miles of motorized and mechanized trail. We note that route #2095A (3.6 miles) is only *very rarely* used for motorized or mechanized recreation. It is used lightly by the grazing permittee.
- CGNF claims another 5.7 miles of mechanized trail would become unsuitable for mechanized use. This is inaccurate. The 4.1 mile Big Pryor Trail 30 is not a system trail authorized in the 2008 Travel Plan. (Please see footnote.¹¹) We would support an amendment to the Travel Plan authorizing this trail, but not authorizing mechanized use.¹²

⁹ See CGNF map of polygon #9 in Appendix D, page 50 of the Proposed Action.

¹⁰ DEIS, Appendix D, page 171

¹¹ Some CGNF staff have claimed Trail 30 is authorized, and have given “explanations.” But a review of the 2008 Travel Plan FEIS clearly shows no hint of this Trail 30, roughly from the Sage Creek Ranger Cabin to Bainbridge Cabin, in either the maps (all alternatives), text, or tables. There is a possible confusion in that the much shorter trail 31 from Tie Flat to Crater Ice Cave and the top of Big Pryor Mountain was erroneously labeled “trail 30” on all the maps and tables in the 2018 Travel Plan FEIS. Its “route name” in the FEIS (page C-33) is appropriately “Big Pryor” since it goes to the top of Big Pryor Mountain. It is the only motor-free trail in the FEIS.

Please review the maps and tables in the 2008 FEIS to see what is, and is not there. See FEIS Appendix C, pages C-14, 22, 33, & 38 and the maps. These pages mention Route 21041 which connects Tie Flat route 2104 to Trail 31 (erroneously called Trail 30). Tie Flat and the trail in the 2008 Travel Plan are four or more miles from the yet to be authorized Trail 30. (Note: A couple places the tables have “Beartooth Unit” when it clearly should be “Pryor Unit.”) The same false claim regarding Trail 30 is made regarding the Big Pryor Backcountry area in Alternative C (DEIS, Volume 1, page 845).

CGNF released detailed maps of the Management Plan alternatives on April 1, 2019. The maps clearly show the trail up from Tie Flat - again erroneously labeled with a red “30” instead of “31.” The “Trail 30” discussed in the DEIS does not appear on these maps. This is appropriate since that trail is not yet authorized.

¹² Motorized and mechanized recreation should not be permitted on #2095A or Trail 30 in any alternative in order to preserve secure habitat for elk, other ungulates, black bear and the sage grouse that summer in the area.

- CGNF claims “there would no longer be opportunities for winter motorized use on 9,376 acres in alternative D.” We believe there is little if any winter motorized recreation in the area. A quick look at Google Earth makes it clear there are at most 3,000 acres suitable for snowmobiling in the Big Pryor RWA – if someone could even get there with a snowmobile.¹³ As CGNF writes elsewhere regarding winter opportunity spectrum mapping in the Pryors:

“It should be noted that this is a mapping exercise. The acreage calculations do not consider topography, access or consistent snow. It only reflects the number of acres legally open to snowmobiling, whether the terrain is accessible by snowmobile or not.” (Underline emphasis added, DEIS, Appendix D, page 168.)

We are disappointed that CGNF focuses on these hypothetical limitations to motorized and mechanized recreation in the proposed RWA – when such opportunities are abundant throughout the Pryors. But CGNF rarely mentions the possibility of enhanced opportunities for hiking and equestrian recreation in proposed RWAs – for which there are almost no designated routes in the Pryors.

As in the Bear Canyon RWA, most of the water developments are near the boundary roads and could easily be excluded from the proposed RWAs with minor boundary adjustments.

Summary: The Big Pryor RWA in Alternative D is clearly an outstanding opportunity for Wilderness designation in the Pryors.

c) Lost Water Canyon RWA (DEIS, Appendix D, pages 172,3)

Only in Alternative D does the proposed Lost Water Canyon RWA extends to the east and south FS boundaries. Nowhere in either the text or maps in the Draft Plan or DEIS have we found acknowledgment of the fact that the other side of this boundary, both to the east and south, is BLM designated Wilderness Study Area. This narrow view of the FS land without consideration of the adjacent BLM land leads to inconsistent management of the single Pryor Mountain landscape. Only the RWA designation in Alternative D would make management consistent across the CGNF/BLM boundary.

CGNF objects that Burnt Timber Road (#2489) would bisect this RWA leaving an isolated, and hard to manage, 1,062 acre piece of the RWA east of Burnt Timber Rd. This is backwards. If this 1,062 acres is *not* designated as RWA, it will be an isolated piece of land managed inconsistently with the adjacent BLM WSA, with which it has a 3.7-mile unmarked boundary. CGNF writes: “*The open [Burnt Timber] road between two parts of the recommended wilderness area would create difficulty for those seeking a wilderness experience.*” This claim is totally unjustified. The 1,062 acres will effectively become an integral part of the large BLM Pryor Mountain WSA, not an isolated piece of the Lost Water Canyon RWA. Burnt Timber Rd will be a corridor between the BLM Wilderness to the east and FS Wilderness to the west.

Similarly the 3,249 acres to the west of Burnt Timber Rd and east of Lost Water Canyon, has a 2-mile unmarked boundary with the BLM Burnt Timber Canyon WSA to the south. Designation of this area as RWA will make CGNF management consistent with the BLM WSA.

CGNF describes at length¹⁴ purported problems with managing the wild horses if this area is designated RWA, but does not acknowledge that almost the entire BLM horse range is designated as WSA. Most of the horse management activities take place within the BLM WSA where the horses spend most of their time.

Despite CGNF’s claim, most of this 4,311 acres appears natural.

d) Punch Bowl RWA

Forest Road #2144 is “cherry-stemmed” into this proposed RWA. CGNF states that, “*This road would make the 7,766 acre recommended wilderness area more difficult to manage for wilderness characteristics.*” This is a valid point, but this would not be the only Wilderness with a cherry-stemmed road. The difficulty is manageable.

¹³ It is unwise to permit any winter motorized recreation on the top of Big Pryor unless CGNF has the equipment and staff to monitor such activity.

¹⁴ In a section titled “Effects of Alternative D” (DEIS, Volume 1, page 827...) there is a discussion of the effects of the proposed 771,425 acres of RWA designation forestwide in Alternative D. Excluding the tables, an amazing one-fifth of this discussion is devoted to only 4,311 acres (less than 0.6% of the 771,425) of proposed expansion of the Lost Water Canyon RWA in the Pryors. Despite the disproportionate length of this evidently biased discussion (page 831), it misrepresents the situation, and fails to mention crucial facts including the existence of the BLM WSA, and that BLM manages the horses on the contiguous WSA.

However it would be much better to shorten, or eliminate the cherry-stemmed road. What need is there for this road that is not outweighed by the wilderness value of this area?¹⁵

3. Cattle Grazing Does Not Preclude Recommended Wilderness Designation

In several places in the Draft Plan and DEIS there are explicit or implicit suggestions of conflict between grazing of cattle and designation of Recommended Wilderness. We note that grazing of cattle is explicitly permitted by the 1964 Wilderness Act. So the existence of grazing and associated infrastructure like fences and water developments does not preclude Wilderness designation.

We have previously shown that grazing developments do not detract from the Wilderness character of the proposed Bear Canyon and Big Pryor RWAs.¹⁶ In a systematic photo survey of these two proposed RWAs, 94% of the 256 photos showed *no* visible fences, stock ponds or water tanks. The survey was along the RWA boundaries where the range developments are concentrated. Away from the boundary roads these developments are even more rare and definitely not “substantially noticeable.” The landscape appears natural and affected primarily by the forces of nature.

In the Wilderness Analysis tables (DEIS, Appendix D, page 168 & 170) CGNF emphasizes that “*virtually the entire area*” of the Bear Canyon and Big Pryor proposed RWAs are within grazing allotments. This is because virtually the entirety (39,300 acres, 90%) of Big Pryor Mountain is grazing allotment.¹⁷ But major parts of these allotments are not “primary range” and experience little grazing.¹⁸

For example¹⁹: Almost the entire (5,659 acre) Red Pryor pasture of the Bear Canyon allotment is within the proposed (10,366) Bear Canyon RWA. This is half of the RWA. But only 25% of this pasture is “prime range.” And this pasture is only grazed eight days per year. Furthermore CGNF permits AUMs on prime range of the Red Pryor pasture at less than one-tenth AUM per acre, or 10.7 acres per AUM. This is two to three times the number of acres prime range per AUM for any other pasture on Big Pryor Mountain. This explains why, despite having hiked extensively within this “pasture,” we have never seen a cow – except, rarely, near the top of Red Pryor Mountain. The rest of the Bear Canyon RWA is either in part of the Lower or Upper pastures or is not part of a grazing allotment. Only 50% of the Lower pasture is prime range. This is probably also true for the part of the Upper pasture within the RWA. So perhaps two-thirds, or more, of the RWA is not prime range, or not even in a grazing allotment.²⁰

This gives a very different image than the statement in the DEIS (Appendix D, page 168): “*The majority of the recommended wilderness area is a major portion of one allotment and primary range within the recommended wilderness area.*”

If CGNF thinks a conflict between grazing allotments and RWA designation is a reason for not designating RWAs, then a serious reevaluation of “multiple use” in the Pryors is in order. It is inappropriate for one “multiple use,” grazing, to dominate all of Big Pryor Mountain to the exclusion of Wilderness, another “multiple use.”²¹

¹⁵ A less desirable solution would be to designate only the area SE of this road as the Punch Bowl RWA. That is still more than 5,000 acres.

¹⁶ “Field Study of Noticeability of Range Improvements and Apparent Naturalness of Upper Big Pryor Mountain,” Dick Walton & Charlie Smillie, September 25, 2017. Reproduced as Appendix VII in our February 28, 2018 comment letter on the Management Plan Proposed Action.

¹⁷ 39,300 acres of 43,830 total on Big Pryor Mountain. This is all the CGNF land south of Pryor Mountain Rd, and west of Crooked Creek Rd. Areas computed with Google Earth. There are 54,203 acres of grazing allotments in the whole Pryors. At \$1.35 per AUM, the 5,760 permitted AUMs in the Pryors generate \$7,776 per year.

¹⁸ For various reasons much of the mapped allotment area is low quality or unsuitable for grazing. Perhaps the mapped grazing allotments should have a disclaimer analogous to that for mapped motorized winter recreation spectrum. (DEIS, Appendix D, pages 168, 170 & 174) “*It should be noted that this [grazing allotment] is a mapping exercise. The acreage calculations do not consider topography, access or consistent [forage]. It only reflects the number of acres legally open to [grazing], whether the terrain is accessible by [cattle] or not.*”

¹⁹ Information from grazing data and maps provided by CGNF at our request.

²⁰ A similar analysis could be made regarding the proposed Big Pryor RWA. Nominally “virtually the entire area” is grazing allotment. But more than half of this RWA is heavily forested north slope of Big Pryor Mountain – certainly poor grazing land. Furthermore two Sage Creek allotment “pastures” partly within the RWA are either “closed” or “not in use due to lack of water.”

²¹ CGNF acknowledges that Wilderness is a “multiple use” on page 113 of the Draft Plan.

Grazing allotments in the Pryor Mountains do not preclude designation of RWAs.

4. Public Comments

The only statement in the “*Summary of the factors considered...*” section of the wilderness analysis tables is a very weak, “*There were public comments received in favor of recommended wilderness area designation for this area.*” In fact: Of the public comments on the Proposed Action that mentioned the Pryors, most (more than 60 individuals and a dozen organizations) explicitly recommended the RWAs in Alt. D. Only two of the comments that mentioned the Pryors asked for no RWAs in the Pryors. We understand that comments are not considered “votes.” But community consensus about “sense of place” does matter.

B. Backcountry Areas (BCAs)

There are several reasons why the concept of “Backcountry Area” is an unsatisfactory substitute for Recommended Wilderness Area designation in the Pryors.

The First Reason is that there is no need for a substitute designation. RWAs are an established designation encouraged in the 2012 Planning Rule. The four RWAs proposed in Alternative D qualify for RWA designation, and are landscapes underrepresented in the National Wilderness Preservation System.

A Second Reason is the considerably different purpose of RWAs vs. BCAs. An important purpose of Wilderness is the preservation of the ecological integrity and diversity of natural landscapes. The single forestwide Desired Condition for BCAs is a very weak, and vague, substitute: “*Natural processes play their role and human use leaves little permanent or long-lasting evidence.*” (Draft Plan, page 131)

The focus of BCAs, beginning with the name itself, seems to be on recreation opportunities. The introduction to BCAs in the Draft Plan begins (page 131):

“Backcountry areas are generally undeveloped or lightly developed. ... Backcountry areas provide for more remote, semi-primitive recreation opportunities, both motorized and nonmotorized, depending on the area.”

The first (of only two) Desired Conditions for the Pryors BCAs is (Draft Plan, page 155):

“Alternative B: The backcountry areas provide for less developed, semi-primitive recreation opportunities, both motorized and nonmotorized in both summer and winter.”

“Alternative C: Quiet, nonmotorized recreation opportunities predominate.”

Wilderness should be considered an ecological designation focused on protecting the natural landscape. This is very different from recreation which is a human-centered activity focused on using the landscape.

A Third Reason is the clear, well understood meaning of “Wilderness,” and “*an existing national level set of regulations on management activities allowed*”²² for RWAs and Wilderness Areas. On the other hand BCAs are “defined” by only a few words and limited plan components in the Draft Plan. They have no consistency with other Forests, and in fact vary among BCAs on the CGNF with some permitting motorized and mechanized recreation. BCA rules can easily be reinterpreted, or changed in the future. The “*consistent stewardship across the National Wilderness Preservation System*”²³ is greatly preferable to the ambiguous BCA designation.

A Fourth Reason is CGNF’s expressed intent for backcountry areas.

The purpose of this four-year Forest Management Plan effort is to revise the outdated 33-year old Management Plan.

- Since 1986 a lot has changed and will continue to change. Many more people visit the Pryors, and more are interested in natural history. Motorized and mechanized travel technology has become more robust.

²² This language is borrowed from the DEIS Volume 1, page 852: “*The management of many of the backcountry areas is influenced by the fact that many of the lands are also inventoried roadless areas, which come with an existing national level set of regulations on management activities allowed. The Chalk Buttes, Punch Bowl, Big Pryor Mountain, and Bear Canyon Backcountry Areas are not within inventoried roadless area.*”

²³ Language borrowed from the Draft Plan, page 113. “*Wilderness character is defined in terms of five qualities ... These qualities can be used to improve wilderness stewardship and foster consistent stewardship across the National Wilderness Preservation System.*” The five objectives for Wilderness management, also on page 113 of the Draft Plan, are much better than the vague BCA descriptions.

- The Pryors are an easy day trip from the largest, and growing, population center in the region.
- In the Draft Plan CGNF has described the many important and unique ecological and cultural values in the Pryors. These were not even mentioned in the 1986 Management Plan.
- The 2012 Planning Rule added new requirements to preserve and restore ecological integrity and diversity.
- CGNF reports “*departure from historic vegetation conditions*” for considerable areas of the Pryors.
- The 2012 Planning Rule requires CGNF to look for areas suitable for Wilderness designation. The areas suggested as BCAs in the Pryors obviously qualify for RWA designation.

Clearly it is time for significant revision in the management of the Pryors for the 21st century.

Yet CGNF describes the intent of “Backcountry Areas” as:²⁴

“In general we intend to maintain the status quo of those areas.” (5:50)

“So the idea is that these are lightly developed lands. ... the way this allocation would work is that they’re pretty much going to maintain the status quo of management. So those are backcountry areas.” (6:08)

CGNF’s intent is only to “*maintain the status quo of management*” for the core remaining natural areas in the Pryors. “*Backcountry Area*” appears to offer little more than a new label for preexisting management.

C. Ecosystem Integrity and Diversity

1. Wildlife: Forestwide

In the forestwide wildlife section of the Draft Plan (page 55) CGNF briefly mentions the “*complementary ecosystem- and species-specific approach*” directed in the 2012 Planning Rule (§219.9).²⁵ CGNF immediately pivots to the “*coarse-filter, fine-filter*” language which obscures the clear meaning of the planning rule.²⁶ CGNF then writes that, “*most of the coarse-filter plan components that benefit wildlife are found throughout the “ecosystems” section of the plan, under headings for air quality, soils, watershed, aquatic, riparian, and terrestrial vegetation.*” Unfortunately we find no plan components in these cited sections that address the ecosystem approach directed by §219.9 (a) of the Planning Rule.

The introduction to the “ecosystems” section (page 16) seems to reinterpret §219.9 (a) (again using the “*coarse-filter, fine-filter*” language) as being concerned with *generic* ecosystem diversity. Apparently the Pryors would fulfill the Draft Management Plan’s ecosystem requirements so long as the overall area features a diverse ecosystem of native species – even if the Pryors “*unique and diverse assemblage of botanical resources and plant associations*”²⁷ did not survive. The Pryors are noted for unique plant *communities*. Unique plant communities are likely to coexist with unique fauna communities, though they are unfortunately not yet as well studied in the Pryors.²⁸

2. Terrestrial Vegetation: Forestwide

We find some encouragement in the forestwide Terrestrial Vegetation section.

“The fine filter for vegetation is addressed by components specific to three categories of native plant species: (1) threatened, endangered, proposed, and candidate species which are designated by the U.S. Fish and Wildlife Service; (2) species of conservation concern, which are identified by the regional forester; and (3) other species or communities identified by the local unit which do not fall into the above categories, but are of local net”²⁹ importance.” (Underline added for emphasis. Draft Plan page 30.)

²⁴ Forest Service Planning Podcast – Ep4 Pam Novitzky, Forest Plan Allocation (I). Underline added for emphasis. <https://yourforestsyourfuture.org/podcasts/forest-service-planning/>

²⁵ This section directs CGNF to “*maintain the [ecological integrity and] diversity of plant and animal communities and support the persistence of most native species.*”

²⁶ The coarse filter, fine filter language appears nowhere in the 2012 Planning Rule.

²⁷ Draft Plan. Page 147

²⁸ A summer 2019 field study will characterize the diversity of insect fauna in three plant communities in the BLM part of the Pryor Mountains. This study will complement previous botanical study of these plant communities. It may begin to show the interaction of flora and fauna in the ecosystem structure and function of differing communities of plants and insects.

²⁹ We do not understand what the word “*net*” means here. Should it be deleted?

Most of this paragraph is about species-specific (fine-filter) issues. But the word “*communities*” evidences support for an ecosystem approach. Unfortunately this section has no plan components. So we look to the Pryors Geographic Area section.

3. Terrestrial Vegetation: Pryors Geographic Area

We commend CGNF on the addition of **3.4.7 Plan Components – Terrestrial Vegetation** to the Pryor Mountain Geographic Area section of the Draft Plan (page 151-3). This is a big step toward correcting a major deficiency in the Proposed Action by including both Pryors-specific plan components, and identifying endemic and peripheral species of local importance that make the Pryor Mountain Geographical Area unique. These components address the Planning Rule direction in the “species-specific” section §219.9 (b). However they do not sufficiently address the ecosystem approach as directed in section §219.9 (a). No plant *communities* of local importance are identified.

The three Desired Conditions are good, but we have a concern about the wording of the first one:

“01 The Pryor Mountains provide resilient ecosystems and conservation values that retain the values associated with future potential designation as a proposed or established botanical special area.”

We enthusiastically endorse the establishment of a “botanical special area.” Our concern is that this desired condition, as worded, might be interpreted to apply *only* to the botanical special area of “*undetermined location and acreage*” if it is established, or to be entirely moot if it is not to established.

The BLM and CGNF areas mentioned on page 152 of the Draft Plan suggest that CGNF may be thinking of the Botanical Special Area as only on East Pryor Mountain, and mostly on BLM. We hope this is not true. CGNF is responsible for much more botanical resources deserving protection on Big Pryor Mountain, including the Bear Canyon watershed. CGNF’s negative comments regarding the “*departure from historic vegetation conditions*” on the Wild Horse Range³⁰ suggest CGNF would find Big Pryor Mountain (including the Bear Canyon watershed) to be an excellent opportunity for a Special Botanical Area – free from horses.

The second Desired Condition again emphasizes a species-specific approach.

“02 The Pryor Mountains provide resilient habitat conditions for the area’s regional endemic and peripheral plant species’ occurrences.” (Underline added for emphasis.)

But the words “*habitat conditions*” again hint at an ecosystem approach.

It appears that CGNF has made a serious effort to address §219.9, but additional, or reworded, plan components are needed to address the ecosystem approach to ecological integrity and diversity direction in §219.9 (a).

D. Monitoring Plan

To be meaningful, plan components addressing §219.9 must be monitored in the Pryors. We see very little in the Monitoring Plan (Draft Plan, Chapter 4) that does this for the unique Pryors ecosystems that we are concerned about preserving for the future. Page 190 of the Draft Plan reports several items required for monitoring by the 2012 Planning Rule. Items #2 and #3 on this list are not covered for Pryors plant communities. The “focal species” identified in the Draft Plan (page 191), “aquatic invertebrates,” and “land bird species and assemblage,”³¹ certainly do not help monitor these plant communities.

Appendix IV of our February 28, 2018 letter Jennifer Lyman, Botanist, Ph.D. provided suggestions for monitoring the ecological integrity and diversity of special plant communities in the Pryors.

E. Wild and Scenic Rivers

We note that CGNF has revised its tentative classification of Crooked Creek from “scenic” (in the Proposed Action) to “wild” for about a mile between the BLM boundary to Cave Creek. This is a slight improvement. But *all* of Crooked Creek has been classified as “wild” for thirty years by two past Forest Supervisors. CGNF has given no rationale or explanation for demoting the designation from “wild” to “scenic,” or for changing only one mile back to

³⁰ Recommended Wilderness Analysis for Lost Water Canyon RWA, Alternative D (DEIS, Volume 1, page 831 and Volume 2, page 173.)

³¹ The Draft Plan does not identify any specific “aquatic invertebrates” or “land bird species and assemblage.”

“wild.” Similarly CGNF has given no explanation for designating Bear Creek as “scenic” rather than “wild,” nor for only designating the lower 1.8 miles of Bear Creek as eligible for WSR designation.

We consider these decisions as obviously contradicted by a plain language reading of the criteria for “wild” versus “scenic” WSR classification. CGNF has not explained their decision, nor given any reason our arguments are not valid. They are in our February 28, 2018 comment letter on the Proposed Action. CGNF has not justified their surprising decisions.

F. Roads and Trails

We are concerned that the Draft Plan very rarely makes distinctions between “roads” and “trails,” or between “motorized” and “nonmotorized.”³² This is an extremely important distinction for much of the public. Yet in the Draft Plan the words are almost always lumped together as “roads and trails” and “motorized and nonmotorized.” When the word “trails” is used alone in the Draft Plan it is usually clearly intended to mean both motorized and nonmotorized – or even just motorized. In common language “roads” are for motor vehicles and for wheels. “Trails” are motor-free and for feet – human and horse.

Semantics aside, there is ample public interest in and support for motor-free and mechanized-free trails on public land. Such routes are rarely mentioned in the Draft Plan and never in the plan components. We understand that the Forest Management Plan does not address site specific designation of travel routes. But it is appropriate that the Plan includes desired conditions and plan components regarding travel systems as, for example, in section 2.4.10 Roads and Trails. Unfortunately motor-free and mechanized-free routes are not explicitly addressed. This absence is particularly glaring since the Pryor Mountain Geographic Area has abundant motorized routes, but almost no designated motor-free routes to serve public interest.

The Roads and Trails section the Draft Plan includes a forestwide desired condition (page 88):

05 “*The trail system accommodates current and reasonably foreseeable recreational demands....*”

There is no indication of whether “trail” here includes motor-free trails. But there is a current recreational demand for motor-free and mechanized-free system trails in the Pryors.

The Emerging Recreational Technologies section of the Draft Plan includes a forestwide desired condition (page 109):

01 “*New recreational technologies contribute to visitor enjoyment and experiences....*”

The oldest, and still popular, recreational technology of all – walking – should be top priority.

We request addition of desired conditions *accommodating current demand* for motor-free and mechanized-free trail systems *contributing to visitor enjoyment and experiences*. These desired conditions could be Pryors-specific, or they could be forestwide, but only if they clearly applied to *each* Geographic Area.

G. Summary and Conclusion

CGNF has made efforts to address the new ecosystem integrity and diversity direction in the 2012 Planning Rule. But these efforts fall short – at least in the Pryor Mountains. Part of the problem is that, despite overuse of the word, the Pryors are truly unique, ecologically, and especially botanically. Sections of the Management Plan addressing, for example, forested, aquatic, and riparian areas generally do not address the ecosystems and plant communities in the arid and non-forested areas of the Pryors. Forestwide Plan sections on terrestrial vegetation, grassland and shrubland are too broad for the specific Pryors conditions.

Very specific plan components are needed to address Planning Rule section §219.9 (a) for the Pryor Mountain Geographic Area. This must include explicit monitoring plans for the special plant communities in the Pryors.

The management history of the Pryor Mountains has been benign neglect of landscape and ecosystem protection. Times have changed since 1986. Public interest has increased and changed. There is an exciting opportunity to designate several valuable Recommended Wilderness Areas in the Pryor Mountains. They will help preserve landscapes and ecosystems that are poorly represented in the National Wilderness Preservation System. This may

³² The sections on Recreation Opportunity Spectrum (ROS) are somewhat of an exception. But ROS is largely a mapping exercise about the character of areas. It is not about infrastructure such as designated travel routes, i.e. roads and trails.

be the last chance to represent these landscapes in the System, given their overall rarity and rapidly changing use patterns.

Recommended Wilderness in the Pryors will help preserve and restore the ecosystems. Such designation would also send a clear message to the public, and to future CGNF staff, about the special importance of the Pryor Mountain landscape.

We will greatly appreciate CGNF's careful consideration of the issues we present in this, and past, comment letters.

Sincerely,

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