

November 14, 2007

Steve E. Williams, Forest Supervisor
Attn. Doug Epperly, Project Coordinator
Custer National Forest
1310 Main Street
Billings, MT 59105

Dear Supervisor Williams,

The Pryors Coalition is a collaboration of several conservation, horsemen, cultural resource, environmental and wildlife focused organizations, and a considerable number of individuals not affiliated with any particular organization. The work of the Pryors Coalition is endorsed by Yellowstone Valley Audubon, Montana Wilderness Association and its Eastern Wildlands Chapter, Back Country Horsemen of Montana and the Beartooth Back Country Horsemen, Our Montana, the Frontier Heritage Alliance, and the Cloud Foundation.

We appreciate the opportunity to comment on the Beartooth Travel Management DEIS. Members of the Coalition have spent a considerable amount of time over several years in the Pryors, in discussion and on computers developing a Travel Management proposal for the Pryor Mountains. We believe our proposal is balanced and moderate. That is why it has attracted so much support from the wide range of organizations and individuals who have joined the Pryors Coalition.

We are disappointed that the Forest, and others, have presented the Pryors Coalition's Conservation Proposal (similar to Alternative C) as at the "extreme nonmotorized" end of the spectrum of options. It is not. We encourage Custer National Forest to take another very serious look at our proposal. We think you will find our proposal is the alternative best supported by your extensive DEIS analysis, is most consistent with the Forest's data on the numbers of recreational users participating in various activities, and complies best with the rules and regulations governing Forest Service actions. The Pryors Coalition shares the concerns expressed in Wildlands CPR's letter to Custer National Forest commenting on this DEIS.

Our Conservation Proposal has broad support. We think most OHV users, if they studied it, would find our proposal to be a reasonable compromise that keeps open most of their favorite routes. Most importantly we believe that our proposal, with its underlying vision, preserves opportunities for responsible land management of the Pryor Mountains far into the future.

For The Pryors Coalition
www.pryormountains.org

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The following are comments from the Pryors Coalition on the Beartooth Travel Management DEIS:

I. General Comments:

Several general aspects of the Travel Planning process are of concern to the Pryors Coalition Including:

- A. Its long term significance and the irreversibility of decisions;
- B. The need for a long range vision;
- C. The obligation to base the decision on the DEIS analysis;
- D. The Executive Orders;
- E. The importance of clearly distinguishing the Pryors from the Beartooths in planning.

A. Long term significance and irreversibility of decisions:

One concern is that the Forest does not fully recognize the long term significance of this Travel Plan. This is illustrated by the following sample quotations from the DEIS:

“For temporal scope, a ten year timeframe for project implementation is used.” (DEIS page 3-1)

“...ten year planning horizon of the travel management decision....” (DEIS page 3-134)

“Travel Management direction would not be an irreversible or irretrievable commitment because human travel is not a consumptive use and the direction itself could be changed at any time.” (DEIS page 3-4)

A ten year planning horizon is simply unrealistic. The 1987 Travel Plan has been in effect for twenty years and counting. The first assumption should be that the new travel plan will be in effect for just as long. In any case impacts on ecosystems and landscapes last for far longer than ten years. Responsible land management planning must have a much longer vision. What we do now will strongly affect the Pryors and the people who love them for many decades.

A closely related concern is the Forest’s assumption that decisions made in this Travel Plan will be reversible in the future. The Forest gives no support for this claim. Many impacts of motorized use are effectively irreversible, and bad decisions may be effectively irretrievable. Many road impacts can only be mitigated through costly and time-consuming restoration measures – which are likely to be unavailable. Some impacts, such as the introduction of noxious weeds and the resulting landscape changes, are clearly irreversible. Where such vegetation becomes established, the original ecosystem can never be restored. Loss of soil, especially in arid landscapes, is also irreversible on a human time scale. The decision to allow a particular road is also very difficult to reverse politically. The belief that Travel Management decisions are reversible and retrievable makes it too easy to avoid recognizing that the decisions made in this Travel Plan will determine the character of the Pryors for many decades and beyond.

B. Need to base travel planning decisions on overall vision and goals:

A second general concern with the Travel Planning process is that it apparently was not based on any long range vision for the desired future condition of the Pryor Mountains. This is indicated by the following quotation from the DEIS:

“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 amending current Forest Plan land use direction which is beyond the scope of this analysis.” (DEIS page 2-10)

We find the Forest’s argument that they are attempting to do travel planning without doing management planning completely inadequate and unconvincing. Travel Planning IS management planning. Very few management decisions have more impact on land use direction than travel planning. The designation of roads preempts future management planning. The Travel Plan is doing management planning by default. For example, designating routes #2088 and #2144 in the Preferred Alternative will preclude the designation of two valuable non-motorized zones in future management planning. At a minimum, the possibility of achieving and maintaining the desired future condition must be preserved.

The best, and easiest, way to create a Travel Plan is to start with a vision of what the Pryors should look like several decades into the future. Why are the Pryors important? How can that be preserved? What will be the value of the Pryors to people in the region in the future? A broad range of resources need to be protected, and a broad range of recreational interests need to be accommodated while minimizing conflict among them and limiting impact on the resources. People want motorized access, and people want to be able to get away from roads.

It seems obvious that to protect ecosystems and individual species the first thing to do would be to define zones for that purpose. Then similar zones would be defined for conflicting human uses – as is encouraged in the 2005 Travel Management Rule. This would almost inevitably lead to a system of non-motorized zones surrounded by motorized corridors. This web of road corridors would provide abundant access to, around, and between the non-motorized zones. Great motorized tours of the Pryors would be available. Great escapes from motorized commotion would be possible. Wildlife would have a core of secure habitat.

It is unfortunate, given the irreversibility of the decisions being made, that the travel planning process was not approached in this way. These decisions will affect many generations of people, and perhaps affect the resources forever. However, given the DEIS’s options, Alternative C, minus route #2088, is the only choice that would preserve the opportunity to create this sort of a system in the future.

C. Need to take the results of the analysis in the DEIS seriously:

A third, and very serious, concern of the Pryors Coalition is that the Forest’s choice of Preferred Alternative is not supported by the thorough and detailed analysis done by the Forest’s specialists for the DEIS.

The Forest identified eleven significant issues to be considered in the decision. In issue after issue the data show that Alternative C is better than Alternative B. We did not find that the Forest Service’s analysis of any of the identified significant issues supported the choice of Alternative B. (See details in Part III.) Specifically, analysis shows the following resources are better served by alternative C: Cultural Resources, Soils, Vegetation, and Wildlife. The Public Safety, and Implementation and Enforcement issues probably are lesser problems under Alternative C. They certainly are not better in alternative B. Maintenance and Administration of Roads and Trails will be cheaper and less problematic under Alternative C.

Finally analysis of the Recreation issue shows that OHV use is a very small part of the total Forest use. As a consequence the analysis of the Economic issue shows that the economic contribution of OHV use to surrounding communities is much smaller than the economic contribution of hiking/walking and other non-motorized uses. How then can the Forest justify choosing Alternative B as the preferred alternative when the analysis of the Human Environment issue shows that this alternative decreases non-motorize opportunity by nearly 15% and increases motorized opportunity by over 11% ? Alternative B emphasizes

OHV use opportunities. Alternative C still allocates just over half of the landscape for the minority of motorized users.

The following quotations are from *Table B-1 "Forest Plan management direction related to travel management"* (DEIS page B-1) :

"The Forest transportation system required by this plan will be constructed and managed to minimize adverse impacts on the resources, while providing access to public lands for the public and for the management of the resources."

"However, the intent will not be to provide road/trail access to all areas on the Forest."

It appears that the Forest Plan requires selection of Alternative C since the analysis in the DEIS clearly shows that Alternative C has the *minimum adverse impact on resources* of the alternatives analyzed. Alternative C does *provide access to public lands* as the Forest Plan directs. Alternative B, however, seems to attempt to *provide road access to all areas* of the Pryors which is explicitly not the intent of the Forest Plan. Consider that in Alternative B only 25% of the Pryors are "core" wildlife habitat more than 1 km from a road, and no zones have been designated as non-motorized.

We are baffled that Alternative B was selected as the Preferred Alternative in spite of the evidence in the DEIS. We find no explanation for this choice in the DEIS. How was Alternative B chosen? Oral comments about "trade-offs" need explanation. It is not good enough to pick Alternative B just because it is "good enough," and does not violate any rules. The DEIS shows Alternative C is better.

We believe Forest officials should be held to a high standard. The Forest should pick the Alternative which is shown by its analysis to be best for all resources. It is not good enough to choose an alternative providing a lower level of resource protection without compelling and clearly stated reasons. We find NO such reasons in the DEIS. We understand that NEPA regulations require such clearly stated reasons.

D. The Executive Orders:

The Forest's Preferred Alternative does not comply with the Executive Orders governing OHV use. All current direction and authority that allow, restrict, and prohibit vehicle use off roads on National Forest lands are tiered from Executive Order (E.O.) 11644, signed by President Nixon in 1972, and modified by President Carter's E.O. 11989 in 1977. These executive orders should be the guiding principles for all decisions related to OHVs. The orders state that the route designation procedures "will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands." In accomplishing this broad goal, the Executive Orders specifically require that the designation of motorized areas and trails shall be in accordance with the following:

1. Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.
2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.
3. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.
4. Areas and trails shall not be located in officially designated Wilderness Areas.

We agree with the strong language above. OHVs should be permitted *only* where they do not excessively

interfere with other recreational uses or damage natural resources. Several sections of the DEIS clearly illustrate that Alternative C would minimize user conflicts; minimize damage to soil, watershed, vegetation, or other resources; and minimize harassment of wildlife and cause less significant disruption of wildlife habitats. Therefore, it is obvious that the current preferred alternative would not meet the Executive Order's mandate.

E. The Pryors are not the Beartooths:

A fifth important issue of concern to the Pryors Coalition is only implicitly demonstrated in the DEIS, but this does not make it of less concern.

The Pryor Mountains are well known to be a unique and special resource totally unlike any other landscape anywhere. They are certainly not just a small sidekick of the Beartooths. Everything, beginning with their limestone bedrock and their climate, is different

We are sure Custer National Forest's resource specialists are well aware of this. Yet far too many times in the DEIS, data from the Pryors unit and the Beartooths unit are added together and averaged in some way. Since the total area of the Pryors is much smaller than that of the Beartooths this procedure greatly obscures and skews the serious impacts of the various alternatives on the Pryors. This is not an acceptable basis for making critical decisions about the Pryors.

No "trade offs" between the Pryors and the Beartooths (or any other National Forests) are acceptable for responsible land management of the Pryors. This procedure of adding the two units together can lead to the assumption that since we have protected quite a lot of the resources in the Beartooths we do not need to protect as much of the Pryors. The Pryors Coalition exists primarily because many organizations and individuals are strongly opposed to such an outcome.

II. Comments on Specific Alternatives and Issues:

The following sections describe the Pryors Coalition's response the Alternatives A, B, and C, and specific concerns about:

- D. Route #2088 on Big Pryor Mountain, and Punchbowl route #2144
- E. Routes up the South and West slopes of Big Pryor Mountain
- F. Dispersed Camping

A. Alternative A:

We find Alternative A to be so far out of the bounds of reasonable land management that it merits no comment. The comments below can be extrapolated to cover it.

B. Alternative B:

As explained above we do not understand the choice of Alternative B as the Preferred Alternative in light of the DEIS. The following is a list of some specific responses to Alternative B – both positive and negative.

Positive:

1. We applaud the Forest's proposal to close the Dryhead Loop route (#2308B) in Alternative B. The Cultural reasons are compelling.

2. We are pleased to see that the short and unnecessary Cave Ridge route #2094 and route #24921 in the bottom of Bear Canyon are closed to motorized use.

3. The seasonal closures as proposed in alternative B are mostly well selected (except for those routes which we do not believe should be motorized at all). The resource protection value of these restrictions is high. One exception is that the seasonal closure on Stockman Trail (#2850) should extend 1/4 mile south of the junction with trail #2492 due to the braided Stockman Trail caused by earlier abuse.

The short two-month closure (April 15 to June 15) is insufficient to protect the resource. The seasonal closures should be from December 1 to July 1 as proposed in the Forest's 2004 proposal. We note that our website (www.pryormountains.org) has photos, taken March 18, 2007, showing serious damage on (and off) the Inferno Canyon road (#2018). The damage was caused by motorized abuse of a muddy road in early March. This shows that the seasonal closures should begin long before April 15.

Negative: Some of these points are discussed in more detail in separate sections below.

1. Route #2088 on Big Pryor Mountain should be converted to a non-motorized trail. Inclusion of #2088 among motorized routes causes considerable negative impact on resources and non-motorized recreation, with little or no gain to motorized recreation. (If necessary it could remain open for administrative use.)

2. Route #2095A should be converted to a non-motorized trail for similar reasons.

3. Route #2144 in the Punchbowl area should be converted to a non-motorized trail to the east of section 29 (including sections 28, 27, 22, and 23) for the same reasons as #2088. (Perhaps it could remain open for administrative use.)

4. There are too many parallel routes up the southwest slope. The four roads in Alternative B are #2496, #2850 (to the junction with #2496), #2018, and #2011. We think two of these are more than sufficient, but are not strongly committed to any particular two.

5. There are too many parallel routes up the hill parallel to Stockman Trail. The four routes are #2012, #2850, #2492, and #2814. Why isn't one enough?

6. There are no designated non-motorized trails up the south or west slopes of Big Pryor Mountain.

7. Route #2093 on Island Ridge is a 1.5-mile road to nowhere for motorized users. Yet it means that hikers and horse people wanting to take the nice day hike to the end of Island Ridge will have to compete with ATVs, and their damaged trails, for the first mile and a half. Again hikers lose a lot and OHV folk gain very little. In 2004 the Forest proposed this route for "*yearlong restriction*" allowing no motorized use to "*reduce road maintenance cost, prevent damage to vegetation, and prevent soil erosion.*" What changed in three years?

8. Robert's Bench route #20972 is a 1.2-mile dead end road providing great temptation for OHVs to wander farther. If motorized it will significantly increase enforcement problems and be a significant loss to hikers looking for an easy hike. In 2004 the Forest identified this route as "*unneeded*" and proposed it for "*yearlong restriction*" allowing no motorized use to "*reduce road maintenance cost, prevent damage to vegetation, and prevent soil erosion.*" What changed in three years?

9. The 300-foot "dispersed vehicle camping" rule should not be applied universally to all motorized routes in the Pryors.

C. Alternative C:

As discussed above the Forest's analysis in the DEIS shows that Alternative C best protects the resources, and is most consistent with the recreation needs on the Forest. However Alternative C could be improved. The following is a list of several possible improvements.

1. Route #2088 on Big Pryor Mountain should be converted to a non-motorized trail. It causes considerable negative impact on resources and non-motorized recreation, without great gain to motorized recreation. (Perhaps it could remain open for administrative use.) Alternative C's designation of this motorized route is the most serious deviation from The Pryors Coalition's Vision.

2. The seasonal closures as proposed in alternative B are mostly well selected. These would be a good addition to Alternative C on those routes that are open to motorized use. The resource protection value of these restrictions is high. One exception is that the seasonal closure on Stockman Trail (#2850) should extend 1/4 mile south of the junction with trail #2492 due to the braided Stockman Trail caused by earlier abuse.

The short two-month closure (April 15 to June 15) is insufficient to protect the resource. The seasonal closures should be from December 1 to July 1 as proposed in the Forest's 2004 proposal. We note that our website (www.pryormountains.org) has photos, taken March 18, 2007, showing serious damage on (and off) the Inferno Canyon road (#2018). The damage was caused by motorized abuse of a muddy road in early March. This shows that the seasonal closures should begin long before April 15.

3. The Forest's proposal to close the Dryhead Loop route (#2308B) in Alternative B would be a good modification of alternative C. The Cultural reasons are compelling.

4. The map of Alternative C in the DEIS has an error showing both Graham Trail (#2013) and Stockman Trail (#2850) as open to motorized use. Only one of these should be open. Table C-3 in the DEIS shows only one of them open.

D. Route #2088 on Big Pryor Mountain, and Punchbowl route #2144:

One of the key ideas in the Pryors Coalition's Vision was the creation of several non-motorized enclaves. Reasons for these areas include protected areas for wildlife and native vegetation, and quiet places for people to walk and ride horseback away from the commotion of motorized routes. For people riding horseback, mixing with ATVs can also become a significant safety issue.

Route #2088 extends into the heart of the Big Pryor North Area, and route #2144 extends into the heart of the Punchbowl Area. Both of these routes are included in Alternative B as motorized, and would preclude, both now and in the future, the designation of these important area as protected zones. (For unknown reasons #2088 is included even in Alternative C which the Forest claims is based on the Pryors Coalition's proposal. This road is probably the worst violation of our Vision in Alternative C.)

Both #2088 and #2144 are dead-end routes without any particularly significant end point destination. The last several miles of #2088 tempts numerous motorized users to drive off the road across the high flat grassland looking for viewpoints.

In Table 3-14 "Recreation Trend" the Forest reports that for walking preferences: *"Easy trails ... will be needed to accommodate growth in active older people..."* (DEIS pages 3-28), and reports that for OHV preferences *"Recreational riders prefer loop trails ATV riders ... seek 20-80 mile trails for day rides*

..." (DEIS pages 3-28)

Clearly neither of these routes satisfies the recreational OHV-riders' preference for long loop trails. Yet they are on easy terrain and would satisfy the described need for easy walking trails. Route #2088 could also someday be extended to create a more challenging trail from Tie Flat up to Crater Ice Cave, west across the top of Big Pryor Mountain and then down to the Sage Creek Ranger station.

Punchbowl #2144:

The Punchbowl is an area of great beauty. Resting between the Crow Reservation and the Dry Head uplift, it is bounded by canyons, meadows and potential forested retreats for wildlife. The Punchbowl Route #2144 dissects the area. While this track is excellent for hiking or backpack campouts, it is too small an area for the noise of motorized traffic.

At a time past when there was a significant elk population in the Pryors, the Punchbowl was used for their winter habitat. It was also a favorite place for cow elk to find seclusion for their calving in springtime. Now there is little seclusion and no elk. Eliminating motorized use of #2144 could help the return of elk to the area.

The Pryors Coalition strongly recommends that the Punchbowl route #2144 be closed to motorized public uses east of section 29 (including segments in sections 28, 27, 22, and 23). Official administrative and non-motorized public activities such as hiking and horse-riding uses of the track would be compatible with wildlife restoration. If elk and deer populations can be restored, the track would be excellent for walk-in hunting. Appropriate management of this track will also secure the habitat for numerous other species of wildlife.

Big Pryor North #2088:

The Pryors Coalition also strongly recommends against opening #2088 to motorized use. This area could, like Punchbowl, be good secure habitat for deer and elk.

Road #2088 also goes through some culturally sensitive areas. In the Cultural Resources part of the DEIS the Forest expresses concern about both Alternatives B and C.

Alternative C: Shriver Peak road accesses the Big Pryor overlook which is now a relatively remote location but still can be visited by motorized traffic. Any increase in access to this area threatens the pristine site setting and introduces the likelihood of vandalism, much as is occurring to the Dryhead Overlook TCP features. Increased traffic can be expected with the use of the "high Country Loop" provided by a portion of this route and routes 2091 and 2095A which could further affect the overlook setting with the introduction of noise dust, and fumes. Dispersed vehicle camping areas at the end of the route may begin to affected TCP features like similar areas in Robertson Draw on the Beartooth Unit. (DEIS page 3-65)

This discussion is partly in error since route #2095A is not open to motorized travel in Alternative C. Nevertheless this cultural concern suggests that the entire route #2088 should be closed to motorized use. This situation is similar to the situation at Dryhead Overlook, so the same solution might be appropriate. Close #2088 and construct a few short walking trails. Trail construction would be so easy here that it would be almost unnecessary.

Route #2091 is part of a major motorized loop route on the top of Red Pryor and Big Pryor Mountains with many spectacular views. This motorized route (#2091) is supported by the Pryors Coalition. Route #2088 branches from #2091 and parallels it within ¼ mile for the first mile and a half. It is still only ½ mile from #2091 at Crater Ice Cave, two miles from the junction. If #2088 was closed entirely, Crater Ice Cave could

be reached by an easy (nearly level) ½ mile hike from Road #2091. Most other viewpoints on the edge could be reached by an easy hike of ¼ mile from Road #2091. Similar views would be available directly from road #2091 itself south of the junction.

In any case there seems to be no need for route #2088 to extend west of Crater Ice Cave. The extension simply creates a four-mile long enforcement problem, and eliminates a significant potential quiet recreation and wildlife habitat area.

E. Routes up the South and West slopes of Big Pryor Mountain:

The Pryors Coalition is particularly concerned about the total dominance of motorized routes up the south and west slopes of Big Pryor Mountain in the Forest's Preferred Alternative B. It is a bit difficult to know how to count the spaghetti of roads, but there are about eight motorized routes up Big Pryor Mountain. Yet there are NO designated non-motorized routes on which horse riders, mountain bikers, and hikers can safely and peacefully go up Big Pryor away from the motorized commotion. This extreme imbalance threatens to make Big Pryor exclusively a motor sport park. This is inappropriate given the DEIS data showing OHV users are a small minority of users – and will continue to be in the future.

Hikers do not always need trails. Some hikers like to scramble over rough country, but the overwhelming majority of hikers prefer to walk on trails. Many people who enjoy Montana's wildlands do not have the skills or experience for navigation through rough and unfamiliar country. These hikers, including new visitors unfamiliar with the Pryors, will have little option but to walk on the motorized routes. We note the following comment made by Rebecca Heath, Gallatin National Forest Supervisor in explaining her decision on the Gallatin Travel Plan: *"Public comment has informed me that trails open to motorized use do not also provide the type of experience most non-motorized users are looking for."* (Gallatin NF, ROD, 10/30/06. pg 19)

Mountain bikers and horse riders usually stay on established trails. It is not possible for them to scramble over rough country including cliffs. The Pryors certainly have much rough country. Mixing these different motorized and non-motorized uses on the same trail can lead to conflicts, safety concerns, and significant degradation of the experience of non-motorized users. These people may feel "shut out" and avoid these parts of the public land. According to Rebecca Heath, *"I've learned that non-motorized recreationists feel that their recreation experience is negatively affected by motorized recreation, and in general, motorized recreationists do not perceive any user conflict. Separating these often conflicting types of pursuits (motorized and non-motorized uses) was an objective I had in building the Travel Plan."* (Gallatin NF, ROD, 10/30/06. pg 91)

Safety concerns arise when mixing, for example, horse riders and ATVs on the same trail. The ATVs frequently travel much faster, and are likely to come up behind the horses "pushing" them from behind. This can make the horses anxious and possibly lead to serious incidents. Motorized users are not allowed to leave the road to pass therefore are impeded (further intensifying the horses anxiety) until the slower user chooses or locates a safe place to depart the road. Terrain may limit the options, and there are no passing lanes on a two track road.

The clear solution to the above problems is to designate at least half of the trails up the south and west slopes of Big Pryor Mountain as non-motorized. We recommend that these non-motorized routes include the Inferno Canyon route #2018, King Trail #2011, and Bear Canyon route #2492, including Bear Canyon Ridge route #2814.

This recommendation for route #2492 is a change from our earlier proposal. This change comes from further analysis of the situation in response to Custer National Forest's Preferred Alternative which overwhelmingly favors motorized access. This alteration of our original recommendation would provide

additional protection from heavy motorized use to the ecologically important Bear Canyon Area. Coupled with Stockman Trail #2850, a non-motorized #2492 would also provide separate trails for motorized and non-motorized users up through the rough lower-elevation country. It would also provide completely separate loading and unloading areas for horses and ATVs.

F. Dispersed Camping:

The Pryors Coalition supports dispersed camping in the Pryors. We do have concerns about where vehicles are driven and parked by campers. The impacts of such driving and parking will increase as the number of users increases over the lifetime of this Travel Plan. Much of the vegetation and soil of the Pryors is fragile – including cryptobiotic soils and cushion plant communities. In some situations recovery from damage caused by the passage of a single 4WD vehicle could take several decades. For this reason we are concerned about the blanket application of the “300-foot rule” to all motorized routes. In principle this means that a 600-foot-wide corridor along every road -- over 72 acres per mile of road -- is vulnerable to vehicle damage. This “300-foot rule” also significantly increases the area susceptible to introduction of noxious weeds.

Generally, most people would not be greatly inconvenienced by parking their vehicle beside the road and carrying their sleeping bag etc. a short 300 feet. Of course they could camp only 100 ft from the road, or alternatively carry their gear 600 feet, without being tempted to drive all the way.

There may be places and routes in the Pryors where driving 300 feet to camp will not cause inordinate damage. We note that the 2005 Travel Management Rule says that “*The Department expects the Forest Service to apply this provision sparingly...*” and “*within a specified distance of certain designated routes...*” (page 68284) The universal application of the 300-foot rule to all routes in the Pryors seems to conflict with this directive.

The Forest should determine criteria for where such vehicle camping is appropriate. Then those “*certain designated*” routes, areas and/or spots where the 300-foot rule is appropriate can be implemented and it can be implemented. Unless and until this determination is made, based on scientific criteria, vehicles should be required to park beside the road. Dispersed camping can still be allowed at any distance from any road.

III. Additional analysis of Significant Issues identified by the Forest:

Below are the Pryors Coalition’s comments on some of the significant issues identified by the Forest.

1. Economics

This issue concerns the potential economic effects on surrounding communities. The Forest’s economic study shows that non-motorized uses (especially hiking and walking) account for far more positive economic impact than motorized uses (especially OHV use). Non-motorized use has about 3.5 times the effect of motorized use. Hiking and walking has about 10 times the effect of OHV use.

Clearly this study suggests that Alternative C should be preferred over Alternative B. Alternative C includes more opportunities for non-motorized use, but includes abundant opportunity for Driving for Pleasure. It also allows considerable OHV opportunities.

The table below shows results of the Forest’s study of economic effects. From this data the Forest concludes:

The Table indicates that approximately 72 total jobs ... and \$1.463 million in total labor income was attributable to non-motorized activities on the Forest... The vast majority (76%) of these jobs and income

were associated with hiking/walking.

Motorized activities were responsible for approximately 22 total jobs ... and \$447,773 in total labor income.... Driving for pleasure on the Forest accounted for approximately 15 total jobs (69% of the motorized total) and \$302,302 in total labor income (67% of the motorized total). OHV use on the Forest accounted for approximately 5 total jobs (23% of the motorized total) and \$110,110 in total labor income (25% of the motorized total). (DEIS page 3-11)

Economic Effect: Data from Table 3-6.
 Employment and Labor Income Effects by Activity Type
 (DEIS page 3-11)

Activity	Employment Effects (full & part-time jobs)	Labor Income Effects (\$)
Non-motorized Use		
Backpacking	7.1	\$145,315
Hiking/Walking	54.6	\$1,113,330
Bicycling	7.8	\$157,616
Motorized Use		
OHV	5.1	\$110,110
Driving for Pleasure	15.0	\$302,302

This table includes the activities most relevant to the Travel Plan decision. It combines the Direct and Indirect Effects, and the Local and Non-local categories. (The way the study was done Billings people were considered “Non-local”.)

This analysis can be criticized for lumping the Pryors with the rest of Custer National Forest. However the results show that the economic benefit of non-motorized use is many times that of motorized use. Correcting this deficiency could not erase that overwhelming difference. Furthermore it should be noted that this is the data the Forest used to make its decision.

2. Human Environment

The Economic data show a significantly higher potential economic effect of changes in non-motorized than in motorized opportunities. The Recreation data show that significantly more forest users recreate by walking than by OHV. Given these facts one would expect that the Forest would choose an alternative which does not significantly decrease non-motorized opportunities in favor of motorized opportunities. Yet the Forest’s Preferred Alternative B decreases non-motorized recreation opportunity by nearly 15%, and increases motorized recreation opportunity by over 11%. This is especially surprising since Alternative C still provides more than half (53%) of the USFS Pryors for motorized recreation. (See table 3-16, page 3-30)

As long as both motorized and non-motorized recreation are allowed in the Pryors there will be conflicts among users. However basing the Travel Plan on a zoning plan could reduce these conflicts. Unfortunately the Forest rejected this approach

Important Note: The percentages in Table 3-8 are calculated incorrectly from the data in Table 3-16. The incorrect values greatly underestimate the impact of Alternative B on non-motorized recreation. Both the incorrect and corrected data are included in the two tables below.

For example Non-motorized Recreation Opportunity decreases from 33,913 acres in the No Action Alternative to 28,849 acres in Alternative B. This is a decrease of 5,064 acres, which is 14.9% of 33,913 acres. Decreasing from 43% to 37% of total (motorized and non-motorized) acreage is much more than a

6% loss in the acres available for non-motorized users. A loss of 5,064 acres, and 14.9% decrease accurately reflect the impact on non-motorized users.

Incorrect Table 3-8. Percent Change in Acreage Available for Motorized and Non-motorized Recreation Opportunities Compared Against No Action (DEIS page 3-17)

	Alternative A	Alternative B	Alternative C
Pryor Unit			
% Change in Motorized Recreation Opportunity	15% increase	10% increase	3% decrease
% Change in Non-motorized Recreation Opportunity	14% decrease	6% decrease	4% increase

Corrected Table 3-8. Percent Change in Acreage Available for Motorized and Non-motorized Recreation Opportunities Compared Against No Action

	Alternative A	Alternative B	Alternative C
Pryor Unit			
% Change in Motorized Recreation Opportunity	25.7% increase	11.5% increase	5.5% decrease
% Change in Non-motorized Recreation Opportunity	33.4% decrease	14.9% decrease	7.2% increase

3. Recreation

The Forest’s data shows that non-motorized use (especially hiking/walking) is significantly greater than motorized use (especially OHV). See Tables below. Table 3-15 also projects use trends into the future showing an increase in all uses, but no significant change in the relative proportion of motorized and non-motorized uses.

This data clearly supports the choice of Alternative C as the Preferred Alternative. Alternative B makes a nearly 15% reduction in non-motorized opportunities. Alternative C decreases motorized opportunity a small amount but still allows 53% of the land in the Pryors for motorized use. (See Table 3-16 below and discussion of Issue 2; Human Environment.)

The projection shows visits for wildlife viewing increasing at more than twice the rate of increase of all other activities. This again supports Alternative C which provides more secure wildlife habitat.

The survey data shows that OHV use is a specialized use of the forest and not a major recreational use for most forests. (DEIS page 3-24)

Excerpt from Table 3-3. Custer NF Activity Participation and Primary Activity (DEIS page 3-7)

Activity	% Participation	% as Primary Activity	Estimated Number of Primary Visits
Relaxing	26.8	6.6	50,051
Hunting	19.6	11.1	84,176
OHV Use	2.9	1.6	12,134
Driving for Pleasure	26.7	5.0	37,917
Hiking/Walking	40.2	14.5	109,960
Bicycling	3.9	2.1	15,925
Viewing Wildlife	42.9	1.0	7,582

Excerpt from Table 3-15. Beartooth District Recreation Use by Activity Projections (DEIS page 3-29)

Activity Type	Use %	2002 Visits	2008 Visits	1 year %	2018 Visits
Hiking or walking	47.8	271,866	284,916	8.0	307,709
Wildlife Viewing	52.2	296,892	328,956	18.0	388,168
Biking	4.3	24,547	25,633	8.0	27,864
OHV Use	2.9	16,494	17,244	7.6	18,555

The tables include the activities most relevant to the Travel Plan decision in the Pryors. Data includes both Pryors and Beartooths.

This analysis can be criticized for lumping the Pryors with the Beartooths. However, the results show that non-motorized use is many times that of motorized use. Correcting this deficiency could not erase that overwhelming difference. Furthermore it should be noted that this is the data the Forest used to make its choice of preferred alternative.

Excerpt from Table 3-16. ROS setting acreage by alternative (acres) (DEIS page 3-30) ROS means Recreation Opportunity Spectrum

ROS Setting	Alternative B	Alternative C	No Action
Pryors Unit			
Motorized	63% (49,119)	53% (41,621)	56% (44,055)
Non-Motorized	37% (28,849)	47% (36,347)	43% (33,913)

4. Cultural Resources

This issue concerns the potential effects that travel management ... may have on the scientific, traditional, cultural, and intrinsic values of archeological, cultural, and historic sites In addition, motorized use in the Pryor Unit could have an adverse effect to certain areas of traditional importance to the Crow Tribe. (DEIS page 2-4)

The following paragraph from the Forest’s DEIS is a very strong statement in support of choosing Alternative C as the Preferred Alternative instead of Alternative B with its 11.5% increase in motorized area in the Pryors.

Expanded access to remote areas has increased vandalism of the cultural resource and general degradation of the historic and natural landscape. Crow Cultural Commission Chairman George Reed states that motorized vehicles are threatening the sacredness, solitude and pollution free atmosphere of the Pryor, Arrow Shot Into Rock, Mountain, the last sacred place where individuals go for guidance and prayer without disturbance and interference. He calls for restriction of motorized vehicle travel in the Pryor Unit. (DEIS page 3-61)

The same concern is expressed again below:

Adverse effects to setting have especially serious consequences for traditional cultural properties, since these sites were chosen for their pristine qualities and remoteness, among other things. Introduction of noise, smells, dust along with increased visitation and accessibility may adversely affect the traditional cultural properties and their continued use. (DEIS page 3-59)

A specific example of this concern with regard to the Preferred Alternative B is discussed in the next quotation from the DEIS.

Shriver Peak Road accesses the Big Pryor overlook which is now a relatively remote location but still can be visited by motorized traffic. Any increase in access to this area threatens to expose these fasting areas to the same circumstances as the Dryhead Overlook has experienced. The seasonal use restriction may alleviate some of the access damage, but the primary season of use is when most of the motorized use activity occurs that can damage the TCPs and affect the site setting. Increased traffic can be expected with the use of the seasonal "high country loop" provided by a portion of this route and routes 2091 and 2095A which could further affect the overlook setting with the introduction of noise, dust and fumes. Dispersed vehicle camping at the end of the route may begin to affect cairn locations much the same as is occurring in the areas of the Beartooth unit. (DEIS page 3-64,5)

Note that the Pryors Coalition does not support this particular motorized "high country loop" although we do support others including all of route #2091. In our plan the "Shriver Peak Road" (#2088) ends at Crater Ice Cave, and road #2095A is not open for motorized use. The Forest's analysis of the Cultural Issues in this area suggests that maybe Route #2088 should be closed in its entirety to motorized traffic

The Forest's analysis of the Cultural Issue ends with the following strong statement about Cumulative Effects.

Cumulative Effects

As our national population grows and the west becomes increasingly developed for minerals, residences, and recreational sites, it is becoming increasingly difficult for practitioners of Native religions (or other practitioners) to find places for ceremonial purposes and traditional cultural practices. Fasting overlooks and plant gathering areas that were once isolated locations have become more rare, or harder to utilize, for religious purposes as development and increased access continues. This loss, along with the loss of other TCPs and ethnographic landscapes are irreplaceable and very difficult, if not impossible to mitigate. (DEIS page 3-66)

How can choosing Alternative B as the Preferred Alternative be justified?

5. Soils

Motorized and non-motorized recreation activities can affect soil and vegetation productivity, cause soil compaction, and soil erosion. (DEIS page 2-4)

The magnitude and extent of soil impacts are generally the least on trails designed for non-motorized uses compared to roads and motorized use trails. (DEIS page 3-73)

According to Table 3-28 on page 3-74, Alternative B will have 140 miles of motorized roads and trails on areas with a Land Type Assessment (LTA) Erosion Hazard Rating of High. Alternative C will have 94 miles of roads with the High Hazard Rating. We suspect that the difference of 46 miles is mostly in the Pryors although the DEIS mixes both the Pryors and Beartooths in the same table so it is impossible to be sure.

On page 3-75 the Forest indicates that motorized travel is prohibited on 32 more miles of high erosion hazard routes in Alternative C than in Alternative B.

We saw no mention of cryptobiotic soils in the Forest's analysis. What does the Forest inventory show of such soils in the Pryors and the potential of Travel Plan alternatives to impact them?

7. Vegetation

The spread of noxious weeds is probably the biggest vegetative concern. Noxious weeds such as leafy spurge, spotted knapweed, Canada thistle, and houndstongue are in and around the Pryors. They have a high potential to radically and irreversibly change Pryor Mountain ecosystems.

Motorized vehicles and equipment contribute the most to introduction and spread of noxious weeds because of vehicle mobility and size, and/or distance of travel within a given time. (DEIS page 3-127)

Different habitats vary significantly in their susceptibility to weed invasions. Table 3-52 on page 3-133 indicates the number of acres which are highly susceptible to infestation by noxious weeds, and which are within the motorized road corridors in each of the various alternatives. In Alternative B 11,000 acres are highly susceptible. Only 2200 are identified as highly susceptible in Alternative C. This factor of five improvement is a strong reason for choosing Alternative C.

Unfortunately the Forest does not indicate how much of the 9,000 acre difference in susceptible acreage is in the Pryors. We suspect that much, if not most, of it is.

The table also reports the percentage of total weed-susceptible acres within the motorized route corridors. (12% for Alt. B, and 2% for Alt C). Since the total includes both the Pryors and the Beartooths it is highly likely that these percentages greatly underestimate the risk in the Pryors where the total acreage is much smaller. In any case this “small” percentage is no great comfort since, as the Forest says: *“Once the weeds are introduced into an area they generally continue to spread into adjacent areas.” (DEIS 3-36)* Thus it can be assumed that any noxious weeds which become established will eventually spread far beyond the 400-foot road “buffers” considered. This is a situation where the ten-year planning horizon is extremely inappropriate.

Given the very serious threat of noxious weeds, and the fact that five times as many acres are highly susceptible within the motorized road corridors in Alternative B than in Alternative C, we simply can see no basis for the following sentence which appears, without justification, in the middle of the analysis.

Based on these observations, there is insufficient data to draw a definite conclusion that any alternative would have a significant difference on the spread of noxious weeds based only on the type of use allowed under that alternative. (DEIS page 3-135)

Note there is apparently a typographical error in table 3-54. The number 7,808 acres susceptible to weed infestation in Alternative C in that table contradicts the number 2,211 which appears in tables 3-52 and 3-55 and elsewhere in the text.

8. Wildlife

The results of the Forest’s analysis for General Wildlife, and for individual species, strongly support the choice of Alternative C. The Forest’s Preferred Alternative B is not the best for wildlife.

General Wildlife:

To analyze the general effects of motorized and non-motorized routes on wildlife, a one km buffer on each side of a route was used as suggested by Ruediger (1996). This is considered the “virtual footprint” (Forman et al. 2003) of the route on the land. The percent of the Beartooth Unit and the Pryor Unit untouched by the two km footprint of these routes is referred to as “core” The percent of the District outside the two km footprint is the area where wildlife generally is undisturbed by travel routes and the activities that accompany them. (DEIS page 3-179)

In Alternative C the wildlife core is 35% of the Pryors. It is only 25% in Alternative B. (DEIS page 3-180)

Alternative C.

Mortality: This alternative has the lowest potential for leading to wildlife mortality.

Habitat Modification /Changes to Behavior: For the Pryors Unit, “core” is the highest under this alternative. (DEIS page 3-181)

Clearly Alternative C should be “Preferred”. The following comment under Cumulative Effects – General Wildlife strengthens the argument.

Hiking, biking, fishing, ATV use, horseback riding, dispersed camping, and other recreational activities are projected to increase sizably over the next ten to twenty years. This will gradually add to cumulative impacts over time. (DEIS page 3-182)

Deer and Elk:

In the DEIS white-tailed deer and mule deer are identified as “habitat indicator species”, and “key species”. However they are not analyzed because the Forest says the “analysis for elk serves as a surrogate for white-tailed deer”, and “impacts are expected to be similar for” elk and mule deer. (DEIS pages 3-151,3)

There are currently no elk in the Pryors but there used to be and could be again with suitable land management. Further, as just noted, the Forest is using the elk analysis as surrogate for a deer analysis. The following conclusion is therefore important and also applies to deer:

Alternative C. Open motorized route density would be lowest in both Units under this alternative and, as expected, elk security cover would be highest. For the Pryors Unit, this is the only alternative that would meet Canfield et al’s (1999) less than 1.0 mi/sq mi road density recommendations. (DEIS page 3-170)

This is a strong argument in favor of Alternative C instead of Alternative B which has 1.7 times the road density.

The Forest also says (page 3-169) that “motorized access is one of the major factors influencing elk vulnerability” and “defined secure areas as >250 acres in size and >0.5 miles from an open road”. By implication this also applies to deer. Alternative C has more area over 0.5 miles from a road – and would be even better without route #2088.

Bighorn Sheep:

Escape terrain is critical for bighorn sheep. Alternative C has 1,200 acres more escape terrain in the Pryors than Alternative B. That is 7.3% more than Alternative B. (See Table 3-168, page 3-172.)

Alternative C. The availability of escape terrain would be the highest under this alternative in both the Beartooth and Pryors Units. The greatest difference would be in the Pryors, where Alternative C would provide 9.9% more escape terrain than under the No Action Alternative. (DEIS page 3-173)

Canada Lynx:

In their analysis of Canada Lynx the Forest lumps the Pryors in an average with the Beartooths and draws the following conclusion:

Alternatives B and C. The availability of lynx habitat would be effectively the same under Alternatives B and C and slightly higher than in Alternatives A and the No Action alternative. Again, the 0.1 mi/sq mi decrease in road density compared to Alternatives A and No Action would be very small, as would the decreased lynx vulnerability and potential for mortality. (DEIS page 3-156)

Since the Pryors are very different from, and much smaller, than the Beartooths this approach of combining the Pryors and Beartooths (used several times in the DEIS) can produce invalid results. Fortunately in this case the Forest also provides the independent Pryors data in Table 3-63 on page 3-155. The above conclusion is based on the final “totals” line which shows the same road density (0.2 mi/sq mi) for Alternatives B and C, and 0.3 mi/sq mi for Alternatives A and No Action.

But the Pryor Mountain Lynx Analysis Unit (LAU) is only one eighth of the area of the total which includes three larger LAUs in the Beartooths. This average road density data is not valid for the Pryors where the road density is much larger (0.6 mi/sq mi in No Action), and there is a big difference between the alternatives. The road density is 0.5 mi/sq mi in Alternative B, and 0.3 mi/sq mi in alternative C which is a 40% decrease. If route #2088 was closed the road density in Alternative C might be even less.

Migratory Birds:

The following conclusion suggests that Alternative C is better than Alternative B, but since it is based on averaging the Pryors and the Beartooths it obscures the difference between the alternatives in the Pryors. We suspect that in the Pryors the difference would be significantly greater.

Alternative C. The total motorized route miles and average motorized route density (0.27 mi/sq mi) for the District would be lowest under Alternative C. Thus, adverse effects to susceptible bird species would be lowest under this alternative. (DEIS page 3-188)

11. Maintenance and Administration of Roads and Trails

Unfortunately none of the data in this section of the DEIS separates the Pryors Unit from the Beartooth Unit. However we expect that much (if not most) of the difference is in the Pryors.

According to Table 3-79 on page 3-200, the estimated yearly maintenance cost for Alternative B is \$96,000 greater than for Alternative C. On the same page the Forest says: “*Costs are for comparison only. Actual costs and funding levels vary by year, location and current situation.*” This seems to be a way to say that funds for the needed maintenance may or may not be available. It doesn’t seem prudent to create more motorized routes than funding is available to maintain. So Alternative C seems both less expensive and wiser.

But the estimated maintenance cost is only part of the cost difference between Alternatives B and C. For example: Five times as many acres in Alternative B are highly susceptible to noxious weed infestation than in Alternative C. (See Vegetation section.) This will require more funding and staff time for weed monitoring and treatment. If the needed weed control staff and funding are not available then it is likely that noxious weeds will infest significant areas of the Pryors.

Another example: The more complex road system and greater number of motorized routes in Alternative B will require more funding and staff time for enforcement. If the enforcement level is the same in Alternatives A and B (as claimed in Table 3-76 page 3-197) then enforcement in Alternative B will be spread thinner and be less effective. Ineffective enforcement will lead to more resource damage which will require even more funding and staff time to correct.

November 14, 2007

Steve E. Williams, Forest Supervisor
Attn. Doug Epperly, Project Coordinator
Custer National Forest
1310 Main Street
Billings, MT 59105

Dear Supervisor Williams,

The Pryors Coalition is a collaboration of several conservation, horsemen, cultural resource, environmental and wildlife focused organizations, and a considerable number of individuals not affiliated with any particular organization. The work of the Pryors Coalition is endorsed by Yellowstone Valley Audubon, Montana Wilderness Association and its Eastern Wildlands Chapter, Back Country Horsemen of Montana and the Beartooth Back Country Horsemen, Our Montana, the Frontier Heritage Alliance, and the Cloud Foundation.

We appreciate the opportunity to comment on the Beartooth Travel Management DEIS. Members of the Coalition have spent a considerable amount of time over several years in the Pryors, in discussion and on computers developing a Travel Management proposal for the Pryor Mountains. We believe our proposal is balanced and moderate. That is why it has attracted so much support from the wide range of organizations and individuals who have joined the Pryors Coalition.

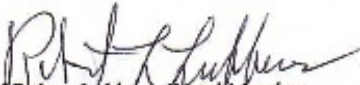
We are disappointed that the Forest, and others, have presented the Pryors Coalition's Conservation Proposal (similar to Alternative C) as at the "extreme nonmotorized" end of the spectrum of options. It is not. We encourage Custer National Forest to take another very serious look at our proposal. We think you will find our proposal is the alternative best supported by your extensive DEIS analysis, is most consistent with the Forest's data on the numbers of recreational users participating in various activities, and complies best with the rules and regulations governing Forest Service actions. The Pryors Coalition shares the concerns expressed in Wildlands CPR's letter to Custer National Forest commenting on this DEIS.

Our Conservation Proposal has broad support. We think most OHV users, if they studied it, would find our proposal to be a reasonable compromise that keeps open most of their favorite routes. Most importantly we believe that our proposal, with its underlying vision, preserves opportunities for responsible land management of the Pryor Mountains far into the future.

For The Pryors Coalition
www.pryormountains.org



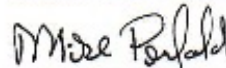
Jeff Hunnes, President
Eastern Wildlands Chapter
Montana Wilderness Association



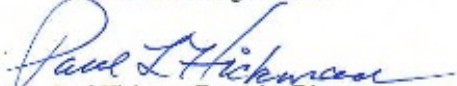
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Beartooth Back Country Horsemen



Mike Penfold, President
The Frontier Heritage Alliance



Paul Hickman, Executive Director
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