

December 12, 2007

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

Dear Supervisor Williams,

The Eastern Wildlands Chapter of The Montana Wilderness Association has about 500 members who care about protecting and preserving central and eastern Montana wildlands and the opportunities for people of all ages to quietly enjoy those lands. The Montana Wilderness Association has nearly 6000 members who support preservation of Montana's last remaining wild places, including public lands in the Beartooths and the Pryors.

We appreciate the opportunity to comment on the Beartooth Travel Management DEIS. This letter is primarily focused on the Pryor Mountain unit of the Beartooth district. The current road system in the Pryors has developed incrementally over the years. Up through the preparation of the 1987 Travel Plan recreational use was light, so recreational impacts were not great. Since then the Pryors have been discovered, ATV use has exploded, and lack of enforcement has led to an abundance of unauthorized, user-created routes. This Travel Plan is THE decision point that will determine the entire future of the Pryors.

The Eastern Wildlands Chapter of the Montana Wilderness Association shares many of the concerns expressed in Wildlands CPR's comments to Custer National Forest regarding the Beartooth Travel Management DEIS and adopts those comments. We strongly endorse the detailed comments of the Pryors Coalition of which we are a part. However we want to emphasize some specific concerns from the perspective of our members.

We have two primary goals which motivate our comments.

1. We want to preserve the truly special landscape of the Pryor Mountains and pass it on in good condition to our successors.
2. We want to preserve opportunities for traditional quiet recreation including hiking; horseback riding; hunting; and bird, flower and wildlife watching.

Based on those two goals, we have two primary concerns regarding Custer National Forest's Preferred Alternative (B).

1. Alternative B fails to designate areas for protection of wildlife and other natural resources, and for quiet recreational pursuits.

It is critical that significant blocks of this special landscape be set aside from the impacts of motorized use. We are disturbed and disappointed that Custer National Forest chose not to formally designate such areas in this Travel Plan. We believe that Forest regulations both allow and encourage such an action – as do principles of responsible land management. If such designations are not made in this Travel Plan then at least the opportunity to do so in the future

must be preserved in the choices of which particular routes to designate for motorized use. Acceptance of motorized use of routes #2088 on Big Pryor Mountain (including #2095A), Punchbowl route #2144, and an overabundant number of motorized routes up the southwest face will prevent appropriate designation of protected zones in the future.

2. In Alternative B, essentially every trail up Big Pryor Mountain is designated for motorized use.

Depending on how they are counted, there are about eight motorized routes up the west and south slopes of Big Pryor Mountain. On its own this seems quite excessive for such a small area. However there is a significant additional consequence. Motorizing essentially all the trails from the low country to the high country leaves no routes (designated or undesignated) for hikers, horse riders, and mountain bikers. These users far outnumber OHV users on Custer National Forest, as on other National Forests. Your studies report the “quiet” users will continue to far outnumber OHV users in the future – unless they are excluded from the Pryors because there are no access routes that do not require competition with increasing numbers of ATVs. It is possible that some hikers might find cross country routes off of the motorized trails. But horse riders and mountain bikes need trails. And the overwhelming majority of hikers prefer to follow a trail rather than having to navigate through rough and unfamiliar country. Given the topography of the Pryors, Alternative B’s designation of eight motorized routes up Big Pryor leaves few obvious and easy hiking routes. Four motorized routes up Big Pryor Mountain are more than sufficient. We suggest limiting motorized use to the Red Pryor Divide Road (#2091), either Stockman (#2850) or Graham (#2013) Trail, and no more than two of the four trails on the southwest slope (#2496, #2850, #2018, and #2011). The others (including Bear Canyon route #2492) should be specifically designated for non-motorized use.

Limiting motorized use to half of the available routes does not impinge on the rights of ATV enthusiasts. As the Gallatin National Forest Supervisor Rebecca Heath points out, a 50/50 split of motorized to non-motorized access is still generous to motorized users, in effect favoring their interests over others:

“I have concluded that the demand for non- motorized recreation opportunities will exceed the demand for motorized uses.... In addition, the non-motorized user’s experience is more impacted by motorized use than vice versa. Again, my objective is to provide a balance of opportunities for Forest users. To me, a 50/50 split of area or route miles allocated to motorized and non-motorized uses does not achieve that goal.” (Rebecca Heath, Gallatin NF, ROD, 10/30/06. pg 90)

Another other issue of concern to us is the 300-foot dispersed vehicle camping rule. This may be appropriate on some routes, if tightly monitored and enforced. But the universal application to all routes in the Pryors seems to be asking for trouble with resource damage, and is contrary to the intent stated in the 2005 Travel Management Rule.

It is well known that much of the current problem of the spaghetti of unauthorized two tracks throughout the Pryors is due to a combination of abuse by some irresponsible drivers, and a lack of USFS enforcement personnel. There is nearly universal agreement among conservation groups, OHV groups and the USFS that enforcement of motorized use rules is critical to the future of the special Pryor Mountain landscape. We are therefore deeply concerned by the Forest’s proposal to authorize unlicensed vehicles in a large area of the Pryors, including most of Big Pryor Mountain.

Surely this would make enforcement more difficult. OHV spokespeople, conservationists, and USFS personnel have all suggested that formal and informal “citizen’s watch” efforts (i.e. report the violators) could significantly help reinforce official enforcement efforts. How can concerned citizens report the license plate number of an unlicensed OHV observed violating motor vehicle use regulations? We see no benefit to the fragile land or to responsible recreationists, either motorized or non-motorized, of allowing unlicensed vehicles on public land.

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 Orders’ mandate.

A very serious flaw in the DEIS is that the range of alternatives analyzed is blatantly inadequate and one-sided. This is obvious in table 3-16 which shows EVERY alternative considered designates the majority of the Pryors unit landscape for motorized use. The “best” Alternative C is still 53% motorized. The data in the DEIS (Table 3-3) shows only 1.6% of users of Custer National Forest identify OHV use as their primary activity.

The Eastern Wildlands Chapter of the Montana Wilderness Association joined other groups to form the Pryors Coalition. We spent considerable time and effort developing a moderate and balanced proposal which provided opportunities for all users (including ATV riders) and also protected the resources of the land. We have made concerted, good faith attempts to involve local motorized groups in the discussion. Ultimately these attempts were unsuccessful, nevertheless we think it is obvious from the analysis in the DEIS that the Pryors Coalition proposal is moderate, balanced, and accommodates all users.

We are therefore dismayed that Alternative C (a modified version of the Pryors Coalition Proposal) is presented as one extreme of the range of options in the DEIS, and is presented as “the non-motorized alternative” (*Billings Gazette* 11/10/07). The Forest did not analyze an appropriate range of alternatives. Where is the alternative that is as “extreme” in emphasizing non-motorized use as Alternative A is in emphasizing motorized use?

Finally we must state our deep concern that there is no explanation in the DEIS for how the Forest chose Alternative B in spite of the clear evidence in the DEIS that Alternative C is better for the resources, and is more consistent with the data on user preference. We believe that such an explanation is required. After this comment period we hope Custer National Forest will choose a final Travel Plan that we can support.

Sincerely,

Jeff Hunnes, President
Eastern Wildlands Chapter
Montana Wilderness Association