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Comments:

See Attachment.

Original letter sent May 17, 2018 [ndash] not during an official comment period. Resubmitted June 4, 2019 to become part of the NEPA record of comments on the Draft Plan and DEIS. Point B1 has been resolved. Points A and C are still of concern. DW

May 17, 2018

Virginia Kelly and the CGNF Planning Team,

All the undersigned attended the April 28, 2018 Forest Planning Meeting and Workshop in Billings. We appreciated that additional opportunity to provide input into the forest planning process. The discussions with CGNF staff and other attendees covered a wide range of interesting and important issues and ideas.

The primary focus of the meeting was to consider whether the five preliminary land designation alternatives suggested by CGNF provided an appropriate range of alternatives to evaluate and consider for the DEIS and final revised Management Plan. With a few exceptions we agree that the five preliminary alternatives provide a range including alternatives addressing our concerns.

The process of attempting to capture the essence of the free-range discussions in brief written notes and summaries is imperfect. There are a few important points that we feel were not appropriately captured or reported in the final FS staff summaries during the meeting[rsquo]s closing session despite being identified as [ldquo]top three[rdquo] issues.

The following comments specifically address the alternatives for the Pryor Mountain geographic Area: A: Alternative D is not a [ldquo]Bookend[rdquo] of the possible range of alternatives:

Our biggest concern is with CGNFs characterization of Alternatives D and E as [ldquo]bookends[rdquo] for the range of alternatives. This implies these are extreme alternatives which will probably be significantly compromised from. This is a very asymmetric pair of [ldquo]bookends.[rdquo]

Alternative E for the Pryors is in fact extreme, with no special designations (other than the small RNA) [ndash] even the minimal Lost Water Canyon RWA designated over 30 years ago is eliminated. There is no possible alternative with less RWA (than none) in the Pryors. Of the many comments submitted during the recent NEPA comment period, we found only one letter (and a second ambiguous one), asking for elimination of the Lost Water Canyon Recommended Wilderness Area.

Alternative D for the Pryors is moderate [ndash] not a [ldquo]bookend[rdquo] of the possible range. An alternative including considerably more RWA could be included in the range of alternatives. Several tens of thousands of acres included in CGNF[rsquo]s Wilderness Inventory for the Pryors are not suggested for RWA designation in any of the five alternatives. We found dozens (perhaps ~ 70) comment letters requesting something similar to Alternative D for the Pryors.

Alternative D is truly a [ldquo]multiple-use[rdquo] alternative including both abundant opportunities for motorized recreation and access, and landscape preserving recommended wilderness. Wilderness is a valid [ldquo]multiple-use.[rdquo] Alternative E is not [ldquo]multiple-use.[rdquo]

B. The west boundary of the Lost Water Canyon RWA in Alternative D is not appropriate:

1. The strange straight line west boundary cuts off nearly 1,000 acres of the existing Lost Water Canyon RWA on Tony Island east of Cave Creek Canyon. This boundary does not make sense ecologically or topographically. One of the four discussion groups at the April 28 workshop was told by FS staff that this was probably a GIS error. Another group was told that this boundary followed the direction in the Planning Handbook [ndash] which we believe it does not. The Planning Handbook (section 73 (2)) directs that RWA [ldquo]boundaries should be easy to identify and to locate on the ground.[rdquo] This unmanageable boundary would definitely not be easy to locate on the ground.

2. We also think that for an adequate range of alternatives the west boundary of the Lost Water Canyon RWA in Alternative D should be considerably farther west to include at least parts of Cave, Island and Commissary Ridge and more of Crooked Creek Canyon. The boundary proposed by the Pryors Coalition et. al. should be in the range of alternatives. CGNF is apparently concerned about a number of 50-year-old clearcuts on Cave Ridge that were left out of the Wilderness Inventory. The RWA could be expanded considerably even avoiding those very old clearcuts.

However the Cave Ridge area now appears natural to anyone on the ground (the criteria for WI and RWA). The area is like a mosaic of forest and meadow left after a wildfire. That was probably a design intention of the timber project 50 years ago. The semi-regular pattern of the old clearcuts is only apparent on Google Earth. We presume CGNF has the authority to revise the WI and include Cave Ridge in the RWA, and request an alternative doing so.

C. The problem with [ldquo]Backcountry Areas[rdquo] is more than a need for clarification:

CGNF apparently concluded that workshop participants thought the [ldquo]backcountry areas[rdquo] (BCAs) needed more clarification. While this is true, our concern is considerably more fundamental. We are concerned that even with more thorough explanation, the BCA concept is too uncertain and weak to provide the needed protection to the Pryors landscape. BCAs are an ad hoc concept, to be defined only by the CGNF management plan. The meaning of BCA varies across the CGNF. The rules in the management plan can be flexibly interpreted by future FS staff, and can be relatively easily modified by Plan amendments. CGNF has a better tool - RWA designation - which is an established concept with a nationally understood meaning and management regulations. These areas clearly satisfy the criteria for Recommended Wilderness designation. These landscapes and ecosystems are, at best, greatly underrepresented in the National Wilderness

Preservation System. We see no reason to give them a designation providing uncertain or lesser protection than Recommended Wilderness.