

Pryors BLM Travel Plan Summary and Suggestions for Comments

The Billings Field Office of the Bureau of Land Management is taking comment on its proposed travel plan for the Pryor Mountains. The BLM manages the southern and eastern sides of the mountains, including most of the motorized routes and many significant non-motorized routes into the areas managed by the Forest Service.

Table 2-2. Route Designations under the Proposed Action

Designation	Mileage	Percentage of Total [*]
County Road, Highway, ROW	10.1	4
Open ¹	114.9	46
Limited Non-Motorized and E-Bike Class 1-3	16.8	7
Limited Administrative and Authorized Users	62.9	25
Limited Non-Mechanized ¹	11.0	0
Limited OHV width	2.6	1
Closed	32.2	14
Total*	250.4	100

Source: BLM 2020

¹ Includes proposed new routes or reroutes.

* Discrepancies are due to rounding.

County roads, highways, and ROW are not within the purview of the BLM to close. Roads that are open are proposed to remain open to off-highway vehicle travel. Limited non-motorized are trails that are proposed to be open to hikers, horseback riders, and mountain bikers, including e-bikes under the BLM's new regulation of e-bikes. Routes open to administrative and authorized motorized uses are not open for public motorized recreation but are available for public non-mechanized recreation (hiking and horseback). Routes that are limited non-mechanized are only available for hiking and horseback use.

Limited non-mechanized hiking routes proposed to be designated in this plan include some very popular hikes in the Pryors, including: Timber Canyon, Bear Canyon (.28 mi of the road), Pygmy Panther, Doug Fir, Big Sky, Rocky Juniper, and Sykes Arch. Other opportunities for popular hikes along administrative roads include: Demijohn Flats, Water Canyon, Turkey Flats, and Sykes Cave Rd. (See the map of the proposed plan on the third page of this document.)

While we appreciate the closure of 32 miles of roads entirely and the classification of 62.9 miles to limited administrative and authorized use only, the overall analysis falls short, and therefore, misses important and legally required opportunities to minimize the overall impacts of motorized recreation on these public lands. Importantly, the EA and associated analysis (like the 2015 RMP that laid the groundwork for this analysis) fail to discuss and apply the Minimization Criteria, a group of factors first laid out by President Nixon in a set of executive orders in the 1970s, and later codified and enforceable under the Federal Land Policy and Management Act.

The criteria require motorized routes to be located in such a way that they minimize damage to soils, watersheds, vegetation, and other resources; minimize harassment of wildlife or significant disruption of wildlife habitats; and minimize conflicts between off-road vehicle use and other recreational opportunities, recognizing that the impacts of motorized use - such as noise, traffic, and exhaust fumes - are antithetical to other forms of quiet recreation. The criteria must be applied on a site-specific, route-by-route basis and the minimization of motorized impacts must also be considered across the whole landscape. Closing roads alone does not signify compliance with the criteria.

Here, the BLM fails to specifically delineate and account for its minimization criteria analysis on a route-by-route basis. The BLM does not explain anywhere how it applied and analyzed each

proposed motorized route - including administrative routes - with the minimization criteria. The EA proposes leaving 114.9 miles of roads open to public motorized use and 62.9 miles open to administrative use - 71% of the travel system - without accounting for how each route complies with the minimization criteria. This is a significant concern because the Pryors are a fragile ecosystem that is particularly vulnerable to damage caused by motorized use, which is widespread in the area. Additionally, the BLM proposed rerouting Stockman Trail, a popular and heavily used motorized access road, without a clear presentation of how building this new road will minimize the impacts of motorized recreation.

There are several other roads that, we believe, a proper allocation of the minimization criteria and more logical approach to achieving a meaningful balance between motorized and non motorized recreation, and the best way to protect the wild character of the Pryors for everyone to enjoy. Several roads include:

- Bent Springs Road, that, along with PM 1134, make a very enjoyable and accessible day hike but are not appropriate for motorized recreation because of the grade and condition of the trailbed, and the fact that the loop “connection” of the roads is over a cliff face and is not at all accessible by any wheeled transport. The map implies a seamless connection between these two roads and that is not true. PM 1134 deadends into the wall of the coulee and Bent Springs Rd ends at the can only be accessed from Bent Springs by scaling the very steep, trailless wall. It is also paralleled by Miller Trail, a popular and accessible motorized route. Redundancy of routes on a landscape does not minimize impacts. Bent Springs also leads to significant cultural resources, including teepee rings and vision quest sites, These are sacred areas that should not be disturbed by motorized vehicles. This area is susceptible to extremely high winds that would exacerbate soil disturbance and erosion caused by motorized use on road beds in such poor condition for such use.
- Inferno Canyon is also redundant to Miller Trail and Stockman Trail, again, posing unnecessary amplification of motorized impacts. This route could easily be decommissioned into a quiet recreation trail for hikers and horseback riders.
- Sykes Cave road is open to administrative use, but it is unclear exactly what administration is needed in the area as this road does not lead to any infrastructure. The road is a cherry stem into the Big Horn Tac On WSA and branches off from the publicly open Sykes Ridge Rd that boards the Big Horn Tac and Pryor Mountain WSA without any clear indication that the section is closed to public use. The intrusion of Sykes Cave Road as a motorized route even for administrative purposes into the WSA poses a risk to the wilderness values of the area.

Please be polite and thoughtful in your comments, providing specific examples of your concerns or suggestions if you can. Our local federal land managers are our neighbors who live and work in our communities and it is important to not make personal attacks on their character.

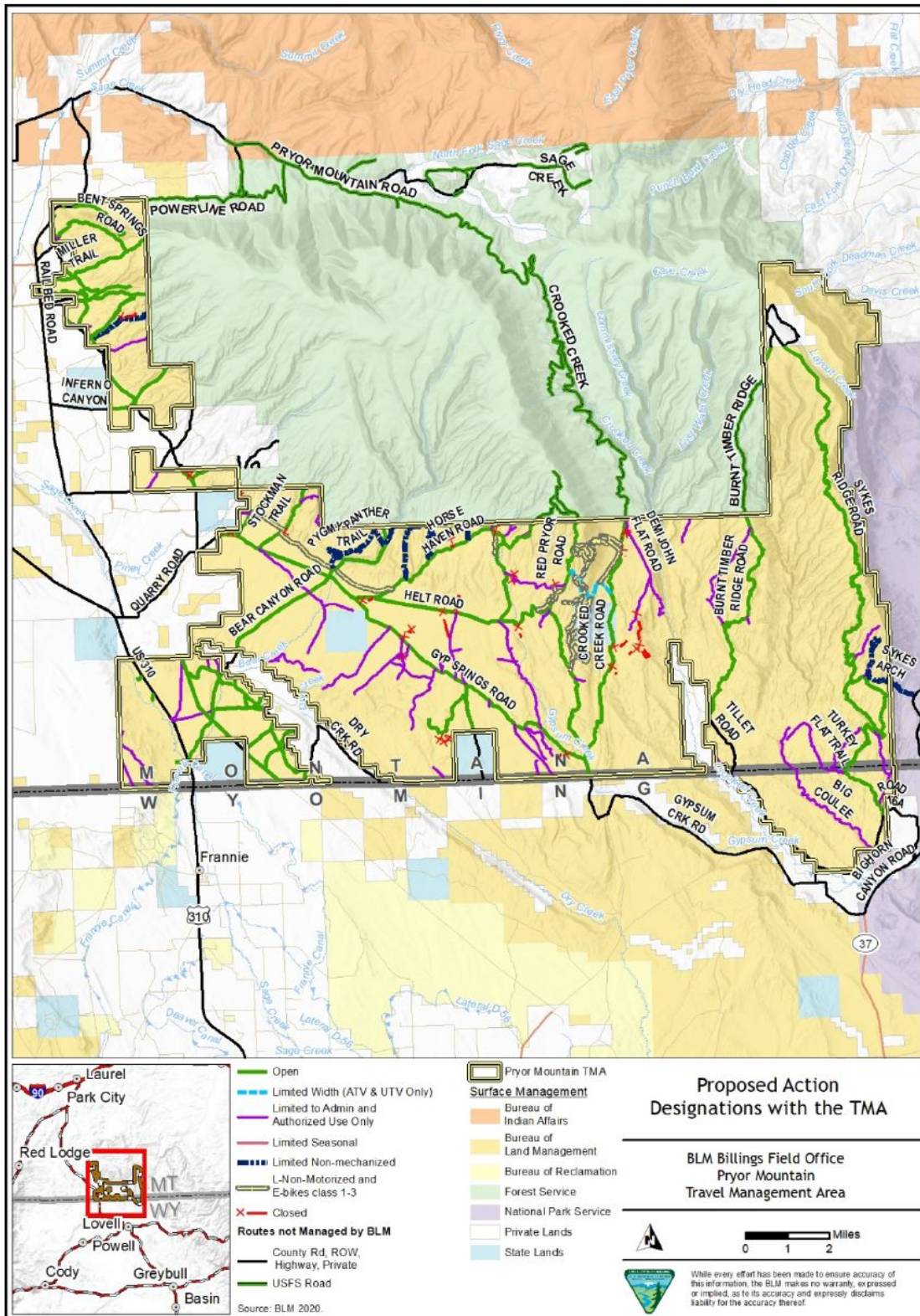


Figure 2-3. Proposed Action