

**Mary Erickson and Virginia Kelly,**

Please consider the following comments on the CGNF Draft Plan and DEIS.

First some comments about the entire Forest, then more focus on the Pryor Mountains.

## **Forestwide:**

### **Two Conflicting Visions:**

There is a very clear division between two groups of public commenters on the Draft Plan. One group is overwhelmingly focused on “*me*.” They are mostly interested in maximizing opportunities for their own favorite form of recreational travel. They see the primary (often only) purpose of the Forest as for recreation.

The other group is focused on the landscape - on preserving the last remaining wild and natural ecosystems into the future. Even motor-free (and mechanized-free) recreation is secondary. I am emphatically in the second group. CGNF should certainly provide opportunities for diverse forms of recreation, but landscape and ecosystem preservation should be CGNF’s first priority.

Borrowing a synopsis by Peggie dePasquale (Wyoming Wilderness Association) of a presentation by Naturalist-Educator, Bruce S. Thompson about the conflict between recreation and wildland stewardship:

- 1) *Every human use has an impact*
- 2) *Different uses have different levels of impact*
- 3) *No user wants to accept the role their use plays in the problem.*

The denialism of point #3 is rampant among the comment letters from mountain bikers, snowmobilers, and other motorized recreationists. (See CGNF “Public Reading Room”) Refreshingly a number of mountain bikers understand and support ecosystem-first management.

### **Selfishness:**

I am personally deeply offended by a frequent meme in comments from motorized-mechanized recreationists. They argue for roads and “trails” nearly everywhere to accommodate people who, due to age and age related physical limitations, would otherwise allegedly be “locked out” of the public land. My wife and I, now in our mid seventies, are increasingly limited in our ability to get to many wonderful wild landscapes. But it is the epitome of selfishness to argue that since we may not be able to get to a wild and untrammelled location, a road or mechanized trail should be available. Then no one could experience that location in solitude. Frequently people making that argument have no such physical limitations. We do not appreciate the use of this “tear-jerking,” selfish and cynical argument on our behalf.

### **Airstrips:**

A very vocal minority of motorized recreationists are demanding airstrips deep inside the Forest landscape. Again this is about “*my favorite mode of recreational travel*,” not about the value of the landscape. Permitting such noisy activity anywhere on the Forest, except perhaps adjacent to existing motorized routes, is unconscionable. The airstrip itself may not be huge, but it will disqualify a very large area from non-motorized ROS classification. A small minority of wealthy people, who own airplanes, should not have special “private” facilities where other people, who own walking shoes, will hike in - expecting quiet, solitude and undisturbed wildlife.

## **Are They Serious?**

The comment letter (5/20/2019) from Ron Normandeau for the Recreational Aviation Foundation unintentionally makes the argument against such airstrips overwhelming. First he complains that:

*“The DEIS ... does not address the affect airplane landing areas have on the environment.”*

Then he submits his highly disturbing description of developments in the affected environment:

*“An airstrip is between 1200 ft. and 2,000 feet long and 30 to 75 feet wide. Features of the airstrip would include a windsock, runway markers (cones or painted rocks) lining the runway area, and airplane tiedowns. ... Additional facilities, normally present at airstrips on NFS Lands, are Fire pans, picnic tables, and toilet facilities.”*

*“Repairs include mowing the strip once a year, replacing the windsock, painting the cones or rocks that line the strip and maintaining the other facilities present.”*

The only responsible response is an emphatic “NO.”

## **The Most Substantive Comments:**

Many many comments posted on the Public Reading Room ask that ecosystem and wildland preservation be given clear priority over all forms of recreation. I wonder whether these comments, especially the brief and simple ones, are quickly dismissed as “not substantive” since they may provide no specifics. Please reconsider. These may be the most substantive and important comments of all.

## **Two Paths Forward:**

Forest Planners and many others are well aware of the conflict between the two groups of commenters. The Recreation Opportunity, and Wildland Preservation perspectives are commonly considered to be equally valid personal preferences requiring balance and/or compromise. This simplistic approach is unfortunate. The Recreation Opportunity group has a primarily self-centered focus on “me” and “now”. The Wildland Preservation group has considerably more humility, embraces the precautionary principle, and is much more focused on the uncertain future. The two perspectives yield very different paths for future management of the land. The Recreation path significantly and irreversibly precludes the Preservation path. Yet the Preservation path can always be diverted to the Recreation path. This asymmetry is sufficient reason to follow the Preservation path for landscape management.

## **Maximum protection of our last remnants of wildland should to top priority.**

Throughout CGNF, wildland and ecosystem preservation and restoration should be first priority. By far the best available tool to do this is designation of Recommended Wilderness. Alternative D is the only alternative in the Draft Plan that comes close to this objective. Weaker “Wilderness-Lite” designations like “Backcountry Areas” are not satisfactory for our last remaining wildlands. Any remaining landscape that qualifies for Wilderness designation should have Wilderness designation. This applies to the entire CGNF – in particular to the Gallatin/Madison area, the Crazies, and the Pryors. The Gallatin Forest Partnership proposal does not meet this standard.

Once wildness is destroyed it can not be recreated in many human lifetimes. 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.

## **The Pryors:**

### **Five Decades in 133 Words.**

I first “discovered” the Pryor Mountain in fall 1966. Pryor Mountain Road from the Sage Creek Ranger’s Cabin to Tie Flat did not yet exist. Crooked Creek Road was a minimal two-track. There have been huge changes since 1966 – in the Pryors, in my understanding of them, and in public impacts on the land. Beginning in my twenties, I saw the Pryors as a wonderful recreational playground. I traveled throughout the area by motor vehicle, ski, bike, and foot in all seasons. Later I spent time in the Pryors with botanists, ecologists, conservation biologists, geologists, archeologists and native Americans. I have gradually come to understand the importance of the Pryors landscape - for much more than recreation. Increasing public use and abuse, and lassie faire management have, and are threatening these irreplaceable values.

### **Change Needed:**

It is clearly time for a thorough reconsideration of the vision for the future of the Pryors, and a corresponding revision of management direction for the 21<sup>st</sup> century.

Expert and talented forest planners, and other CGNF staff have worked hard to produce a thorough and detailed DEIS for Forest Plan revision. However I believe my longer, and broader, perspective of the values of, and threats to the Pryors should be important help to the best forest planners and the oldest old-timers among the CGNF staff. I also hope to be visiting the Pryors after the forest planners and old-timer staff have moved on or retired.

I have watched the changes in the Pryors and the public impact on the landscape. I can see where this is going if land managers (USFS, BLM and NPS) do not make significant changes. I emphatically endorse all the recommendations in the June 1, 2019 comment letter from the Pryors Coalition and several other organizations.

A most important recommendation of the Pryors Coalition is the designation of four RWAs in the Pryors. Inexplicably some people promote lesser alternative designations. This is particularly disturbing in the Pryors where no Wilderness is yet designated, and only negligible Wilderness is recommended by the FS. There seems to be a discriminatory bias against eastern Montana landscapes like the Pryors that are radically different from traditional western Montana Wilderness landscapes. These differences are precisely why it is important to provide maximum Wilderness protection for these Pryor Mountain wildlands.

Thank you for considering my perspective.

*Dick Walton*

2928 W. MacDonald Dr.  
Billings MT 59102

**P.S.** Of the many comments posted so far on the CGNF website (6/4/19), almost all that explicitly mention the Pryors ask for RWAs designation in the Pryors. I have copied 90 such letters from the CGNF Public Reading Room. In addition nine or ten organizations have signed letters supporting the designation of Pryors RWAs.

These are real comment letters from real people. I specifically excluded the hundreds(?) of tiring, cut-and-paste comments from people, who probably have never heard of the “Pryor Mountains,” such as:

*“Alternative D creates 39 Recommended Wilderness areas totaling over 711,000 acres, including the Gallatin Range, Lionhead, Crazy Mountains, .... Pryor Mountains, and Tongue River Breaks.”*

Only two comments prefer Backcountry Areas. One writer is “intrigued” by the idea of lesser (than Wilderness) designation, the other wants no limitations on mountain biking – even though the Pryors RWAs have essentially no such routes. There are abundant mountain biking routes elsewhere in the Pryors. Perhaps five more individuals do not want RWAs. They are apparently unaware that the RWAs leave essentially all motorized routes available.