

May 14, 2019

Custer Gallatin National Forest
Attn: Forest Plan Revision
Custer Gallatin National Forest
10 E. Babcock, P.O. Box 130
Bozeman, MT 59771

Virginia Kelly, Forest Plan Revision Team Leader,

I am not sending this comment to <https://tinyurl.com/caracgnf> because I don't think it should be posted on the Public Reading Room. I think it falls under "etc." in "*The agency may withhold letters containing proprietary information, sensitive cultural or habitat locations, profanity, etc.*" To publically post it may exacerbate the very problem that this comment addresses.

In early April, in response to public requests, CGNF announced that new and more detailed maps of the alternatives were available on the CGNF website. This effort by CGNF is appreciated. The maps show the relationship of the designated areas to roads, trails and topography. The problem is that, in the Pryor Mountain Geographic Area, the Forest baselayer map shows too much.

The maps show at least **15 miles** of roads ("motorized trails") in the Pryors that are not authorized for public motorized use. All of these routes and numbers are marked on the attached map for Alternative A in the 2008 Travel Plan. Alternative A was the extreme motorized-dream alternative.

None of these 15 miles of routes are on the MVUM. "Advertising" these unauthorized routes is asking for trouble from some motorized recreationists. Some of these routes (e.g. #2091H) are being driven as a result of unlocked or locked but unwired gates, signs removed and tossed under the bushes, and lack of enforcement.

Another likely result of these inaccurate maps is that some commenters on the Draft Plan may erroneously believe that the proposed RWAs will "close" roads that are currently not motor-legal – and may never have been.

Four miles of these 15 miles of routes were not system routes either before or after the 2008 Travel Plan decision. They were and are not authorized for either public or administrative use. These routes, #20162, #2091H3, and #2091H4, are *not* on the maps in the 2008 Travel Plan FEIS for either the No Action Alternative, or Alternative B Modified (the decision). The tables in Appendix C clearly indicate they were non-system routes (Table C-1, pages C-5 & 6). The 2008 decision did not change that.

Three and a half miles of the 15 miles of routes are authorized for administrative use only. These routes, #2095, the spur #20952, and Cave Ridge #2094, are shown on the map in the 2008 Travel Plan FEIS for Alternative B Modified.

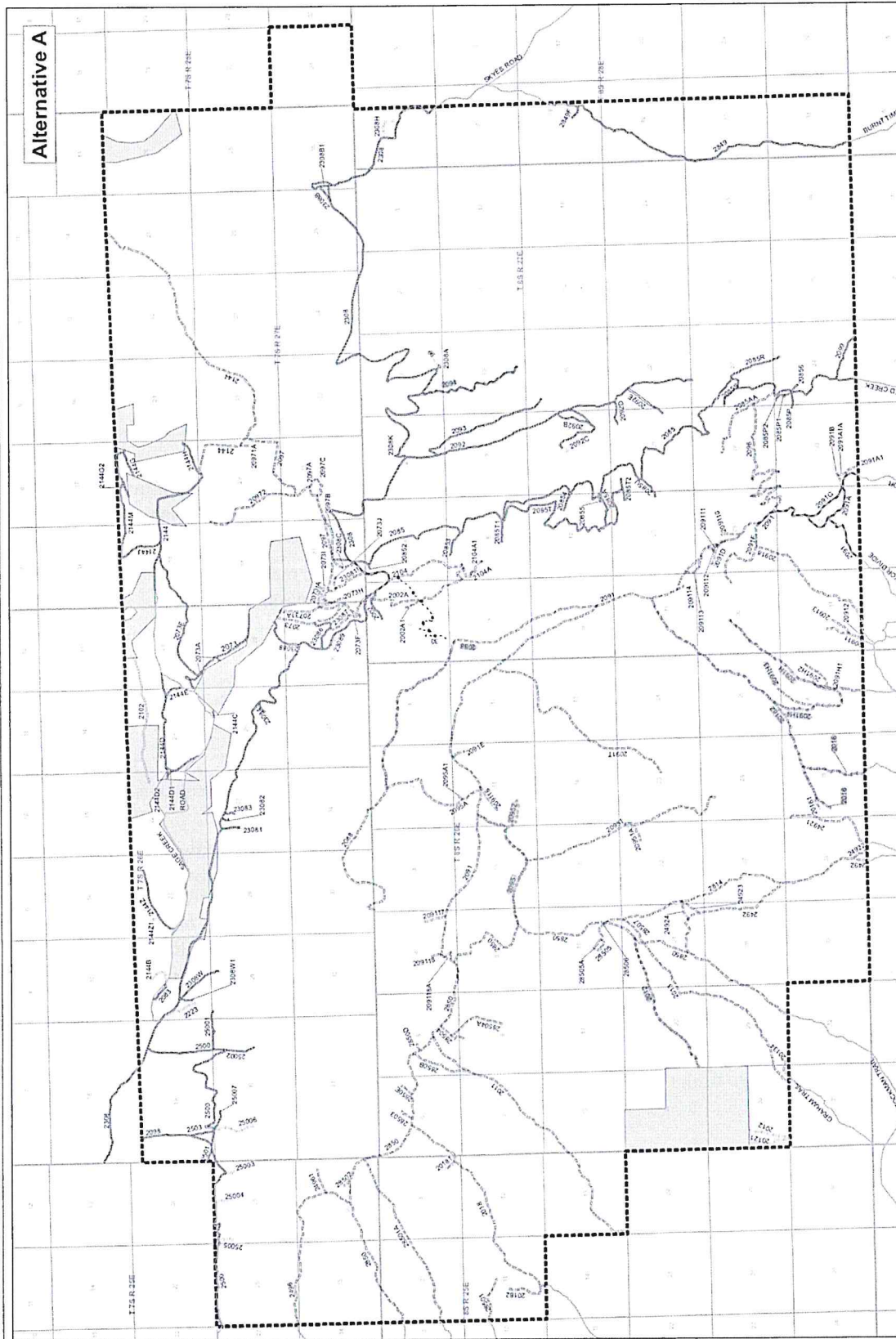
Seven and a half miles of the 15 miles of routes are of somewhat ambiguous status. They are certainly not authorized for public motorized use. They may, by default, be considered authorized for administrative use since they are in Table C-4. But these routes are *not* shown on the 2008 Travel Plan FEIS map for Alternative B Modified. These routes do not appear to have any administrative use. It may be that CGNF staff just have a hard time "letting them go" even though that would be better for the land. These are routes #2091H, #2088 (from the top of Big Pryor NW to #2095A), #2012 (Piney Creek), and #2016.

None of these fifteen miles are authorized for public motorized use. It is unfortunate that they are shown on the recently released detailed maps of the Management Plan alternatives. It is too late to undo the release of these maps. But these unauthorized routes certainly should not be shown on maps in the final Plan and FEIS where they would be a continuing "attractive nuisance." With GIS it should not be difficult to generate a more appropriate Forest baselayer map to use.

Sincerely,

Dick Walton
2928 W. MacDonald Dr
Billings MT 59102

P.S. I have been disappointed that for years maps distributed to the public for many CGNF planning documents (for EAs and EISs) have shown these unauthorized routes.



Alternative A

FEIS June 2008
 Pryors Unit
 Travel Management
 Custer National Forest
 Beartooth Ranger District



[DATUM] NAD83
 Projection: ALBERS Equal Area

Legend (See Appendix C for further detail)

- | | | | |
|---|---|--|---|
| <p>Roads</p> <ul style="list-style-type: none"> — Roads open to all vehicles, Yearlong --- Roads open to all vehicles, Seasonal --- Roads open to highway vehicles only, Yearlong --- Roads open to highway vehicles only, Seasonal --- Administrative use only --- Other Public Roads | <p>Motorized Trails</p> <ul style="list-style-type: none"> --- Trails open to all OHVs, Yearlong --- Trails open to all OHVs, Seasonal --- Trails open to vehicles 50" or less in width, Yearlong --- Trails open to motorcycles, Yearlong --- Trails open to motorcycles, Seasonal | <p>Non-Motorized Trails</p> <ul style="list-style-type: none"> --- Trails open to hiking, mechanized (bicycles, etc) only, Yearlong --- Trails open to hiking only, Yearlong --- Trails open to hiking, pack, saddle, and stock, Day Use --- Trails open to hiking, pack, saddle, and stock, Seasonal --- Trails open to hiking, pack, saddle, and stock, Yearlong --- All non-motorized activity, Yearlong | <p>Wilderness</p> <ul style="list-style-type: none"> --- Wilderness --- Non-National Forest Lands --- Forest Boundary |
|---|---|--|---|

Pryors Unit

