



MONTANA MOUNTAIN BIKE  
A L L I A N C E

June 7, 2019

To: Custer-Gallatin Forest Planners,

The Montana Mountain Bike Alliance (MMBA) was organized in 2007 to provide a united voice for mountain bike riders across Montana. Our mission is to preserve, protect, and promote mountain bike access and diverse riding opportunities on Montana's public lands through education, communication, and unified action. We promote and educate our constituency regarding public land stewardship, social etiquette and the environmentally sensitive practices of trail riding and maintenance.

MMBA's constituents value big, wild landscapes, fresh air, clean water, abundant wildlife and sustainable, accessible trail systems. Our members have contributed thousands of hours working collaboratively with our partners to maintain and make safe the trails for all who share these wild landscapes. In the face of increasing wildlife habitat concerns, recreational pressures and climate change, MMBA believes that pro-active, science-based management of our public lands is preferred to default restrictions and bicycle banning policies that have been randomly applied across Region One. We believe that if land managers are given the discretion to make localized decisions, with the support of local stakeholders, they will be more responsive and accountable to our precious public lands.

The following are MMBA comments on the Draft Revise Forest Plan offered by the Custer-Gallatin National Forest Planning team:

Working through the alternatives, studying the details, MMBA is supporting Alternative B as a basic starting point for our comments. We believe Alternative B makes the most sense because it doesn't ignore federal requirements to identify and recommend lands for future Wilderness protection, yet the recommendations don't preclude allowance of existing uses within those recommended lands. We feel this is a careful approach to managing Recommended Wilderness Areas (RWA), complying with the 2012 Planning Rule and the Forest Service Manual.

MMBA has looked at the other alternatives and will touch on them briefly here. Alternative C identifies RWAs in places that are currently used and enjoyed for

bicycling, and then close those areas. Alternative D would close much, much more land to recreation. Managing Alternative D could be a futile task, as many current recreational routes would pass through the RWAs. Alternative E is very desirable for recreation access but this alternative disregards the legal obligation the Forest Service has to recommend Wilderness quality lands to Congress. MMBA feels all of the alternatives would adequately manage the land, but the trick is to manage the public.

The 2003 Regional directive banning non-conforming uses within RWAs is now thankfully optional, with the Forest Service Manual providing a hierarchy of land management options. The directive has been problematic, fostering mistrust of the Forest Service, lawsuits, and might even play a role in reduced agency funding. MMBA is glad to see the Custer-Gallatin considering allowing existing uses to continue and that the Recreation Opportunity Spectrum maps show appropriate matching recreational allowances.

We support Alternative B (Alt B) but will address the numerous modifications we would like to see added making Alt B more acceptable and enduring to a broader range of supporters. Here are our preferences, starting with RWA changes.

#### **Lionhead RWA** (Alternative E)

Cyclists ride in the Henry Mountains late June until the first snowfall. Lionhead is a special place, straddling the Continental Divide and two states; all regional mountain bike riders from Wyoming, Idaho, and Montana take pride in our stewardship of the trails there. MMBA is pleased to see a number of management options allowing mountain bicycling to continue. We feel that Alternatives B and C could be acceptable except the corridor width in C and the exclusion of bicycle access to Coffin Lake. MMBA feels the mile-wide corridors shown in Alternative C are far too wide and misrepresent bicycling impacts. Alternative E, which shows a Lionhead Backcountry Management Area is the best fit for the land, its resident creatures, and the public. We feel that the present management of Lionhead is a sweet spot. Management has proven that we can all get along and it has protected wilderness character. MMBA supports Alternative E for Lionhead, implying honoring our present travel plan situation and continued ability to be volunteer stewards of all the Lionhead trails.

#### **Line Creek Plateau RWA** (Alternative B)

This little vestigial arc of Recommended Wilderness could present problems at some point in the future. An extension of designated Wilderness on the plateau above, this RWA would cover the steep slopes above the main switchback of the Beartooth Highway. MMBA questions the wisdom of applying RWA status to these steep unstable slopes. Our concern is that the slopes can and do slide on occasion, damaging the road below. If stabilization work for public safety needed to occur in the RWA or in the future as a Wilderness Area an additional act of congress would be required to allow work to happen. Lets not go there. The

slopes will never be developed and they are already self-protected by topography. The Alternative B Line Creek RWA serves no purpose. Please remove the small Line Creek RWA from all alternatives.

### **Mystic RWA (Alternative B)**

Mystic Lake is a reservoir managed by Northwestern Energy for power generation. It's a beautiful spot and someday it may even be converted back to a more natural setting. But for now it is a managed landscape containing adjacent pipelines, trolleys, trains and a tower; plus a house, power station and manicured park. The lake shoreline is at an artificial level, this is important because its level is maintained by man, not nature. The RWA as proposed would serve to potentially extend Wilderness down to the lake level. Sometime in the future, Mystic Lake in its entirety might be appropriately included within Wilderness, but to do this right now might be inviting unforeseen administrative or public safety problems to arise. MMBA feels it best to drop the Mystic RWA from all alternatives.

### **Red Lodge Creek-Hellroaring RWA (Alternative B)**

MMBA doesn't have any issues with this except to note that the RWA is on Timberline Creek. The name of the RWA is misleading and should be corrected.

### **All RWAs (Alternative D)**

MMBA understands that the quest for more Wilderness designation is both honorable and beneficial as well by identifying areas that potentially could become part of the National Wilderness Preservation System. However Recommended Wilderness can immediately become divisive if existing uses must be generally restricted as a condition of this administrative designation. We feel it best when identifying places that rate highly for wilderness character to not restrict existing uses, but instead take a hard look at management details for an area instead. While organized Wilderness proponents advocate loudly and publically for creation of RWAs as an administrative defacto wilderness area, this verbal action is usually only a portion of the story. There are usually many hundreds of other people who will be impacted by the general restrictions of RWAs. Do not restrict existing uses; use the hierarchical guidelines provided by the 2012 Planning Rule and Forest Service Manual to manage existing uses in these areas.

### **Gallatin Crest RWA (Alternative B)**

This area, scaled down just a bit from Alternative C, appears to strike a compromise. MMBA feels this compromise is good, but will suggest some changes. While wilderness character has been compromised in the Hyalite watershed, and Alternative B recognizes this, there are a few other places wilderness character is additionally affected by frequent public visits.

**Cooper Bench.** One that MMBA has commented on before is Cooper Bench. Located near Mountain Sky Guest Ranch is partway in and partway out of the WSA and proposed RWA. The bench is crisscrossed by equestrian trails. These trails have also served as a mountain bicycling destination in past years. Cooper Bench needs to be better managed. It would be an appropriate location for a small, contained community trail system. MMBA would like to see the RWA boundary adjusted to exclude Cooper Bench.

**Big Creek corridor.** MMBA favors Alternative B version of the Gallatin Crest RWA because lower Big Creek has been left out of the RWA. During the four-year course of the Gallatin Collaborative, Livingston mountain bicyclists fought hard to be heard, often expressing that lower Big Creek up to Smokey Creek was a very important route for family recreational access. The Big Creek trail is also consistently impacted by equestrian day rides from Mountain Sky Guest Ranch, and by outfitter pack trains traveling to hunting camps beyond Bark Cabin Creek. For those Livingston bicycle riders that have been excluded from the Gallatin Forest Partnership, Alternative B recognizes that profound need for access to a treasured family-friendly trail.

MMBA is now going to make a case for additional Gallatin Crest RWA boundary adjustments. Trail 96 was an important destination for mountain bicycling for almost 30 years. During that period bike riders accessed the crest primarily via Windy Pass, but also from Ramshorn Lake and Hyalite. We made a number of observations during those years:

**Windy Pass activity.** We noted that once beyond Windy Pass or Hyalite, The trail was generally unused except by bicyclists and even more so by motorcyclists. We're not saying that hikers didn't use and enjoy the trail, we're saying their activity wasn't frequent or even regular. In contrast at Hyalite there is an ongoing column of hikers who think nothing of their impacts to obtain Hyalite Peak's summit. This constant activity might be one reason for the thoughtful northern boundary setback of the proposed Gallatin Crest Recommended Wilderness Area. What the Alternative B RWA boundary fails to recognize is that a substantial quantity of hikers also scrambles up the trail into the Windy Pass Area, running around the meadows to gaze into various drainages enjoying the views. The trailhead is often packed with vehicles from these hikers. Adding to the traffic is the late summer outfitter pack trains that shuttle supplies into the several hunting camps in upper Big Creek. These outfitters in general are nothing short of rude to everyone else. The outfitters often cut corners on the trail ascending up to the pass, showing no regard for the trail tread or the work and money required to maintain it. The trail is simply a convenient shortcut to upper Big Creek hunting camp locations. Windy Pass and trail #82 is used frequently enough to affect the wilderness characteristics of solitude. This situation is unlikely to change.

**Deferred maintenance of unsustainable trails near Windy Pass.** Trail #82 is problematic, being constrained by rock formations and steep gullies. It is steep and often dangerously slippery. Trail #82 has needed major upgrades and rerouting for 20 years. To achieve a low maintenance sustainable trail, this work will have to be done with machines. Also trail #177 is far too steep and needs rerouting to become a low maintenance sustainable trail. Finally trail #420, right behind Windy Pass cabin, is a fall line trail situated in soft meadow soils. It continues to erode at an alarming rate. This short trail should be entirely bypassed and put to bed, a job that could have been accomplished by volunteer labor 10 years ago when it was first brought up to the Bozeman Ranger District! Two other sections of trail #96 south of Windy Pass also need extensive machine work and rerouting. These sections continue to unnecessarily erode.

**Windy Pass Cabin problem.** A travesty of Alternative B is the prospect of removing the Windy Pass Cabin from the Forest Service cabin rental program and even stating that the cabin could ultimately be removed. Many people are shocked at this abhorrent proposal arbitrarily assigned to Alternative B. Windy Pass Cabin is an important and iconic gathering place, very much loved by generations of folks. MMBA believes this devotion should be recognized. MMBA feels that speculating about the fate of the Windy Pass cabin isn't appropriate for any of these alternatives, but a topic to be discussed as part of any future Wilderness bill. Windy Pass Cabin should be appropriate in all alternatives! Remove this language from Alternative B.

**MMBA strongly recommends in order to solve these managerial problems that RWA consideration be removed from Windy Pass, enlarging the Buffalo Horn Backcountry Management Area into the Windy Pass area.**

Shifting boundaries would enable the Forest Plan to more accurately reflect the intensity of activity at Windy Pass and to bring machines up the trail to fix the many trail issues around Windy Pass. Placing Windy Pass within the Buffalo Horn Backcountry Area would also nullify the Windy Pass Cabin management conundrum. MMBA realizes that a larger backcountry area only corresponds to historical and current uses and needs but wouldn't change current interim travel management, a separate topic.

**Lone Indian Peak.** A triangle of land, over 8,000 acres, is formed by the Buffalo Horn, Porcupine, and Elkhorn trails. Lone Indian Peak is contained within the triangle. **To make up for making Windy Pass a Backcountry Area MMBA suggests that the Lone Indian Peak triangle become a Recommended Wilderness,** defined by Backcountry Area trail corridors. This area is critical wildlife habitat, in the Grizzly Bear Recovery Zone and deserving of Recommended Wilderness status. There would be a net gain of Recommended Wilderness by omitting Windy Pass and adding Lone Indian Peak.

**Gallatin Crest Trail #96** along the Gallatin Crest continues to have a profound importance to bicyclists. It was historically enjoyed, revered, and loved as the premier high country bicycle route in Montana. Each outing required careful

planning, attention to logistics and coordinated teamwork. Riders were self-sufficient, able to deal with fatigue, weather, and mechanical malfunctions. Riders planned summer outings to gradually gain a level of fitness needed to tackle the “Crest”. The trail passes through the range like an elevated highway, enabling one to peek into the basins on either side and view wildlife. Sometimes we would see mountain goats or bighorn sheep near the trail. They never seemed very concerned as our small group passed by. During the 2000s riders sadly witnessed the swift demise of the Whitebark Pine groves along the Crest. MMBA has also learned that the high country containing the Crest Trail is unique in the HPBHWSA, by having only half of the quantity of biological species compared to all other zones within the WSA. Bicyclists always knew this route was special; it is the least environmentally sensitive location in the WSA to have a trail for human passage. **MMBA suggests that the Forest Plan identifies Trail #96 in some way that reflects this unique characteristic, such as a Natural Area.**

**Buffalo Horn Backcountry Boundary.** The boundary between the Backcountry Area and the Gallatin crest RWA is too wide, placed arbitrarily ½ mile from the trail using the edge of the Recreational Opportunity Spectrum overlay. MMBA believes this ROS overlay is far too large and can become problematic in interpretation. In the National Wilderness Preservation System, corridors are usually much narrower than what is shown by this map. Sometimes corridors have proven to be too narrow, causing maintenance and repair problems for trail and road upkeep. Please adopt narrower but moveable corridors in the plan. That way when trails or roads traverse through or along the edge of RWAs or even Wilderness the corridor can be shifted to enable necessary repairs or reroutes. The Porcupine trails #160 and #34 below Onion Basin are highly eroded, needing extensive rerouting to become sustainable. Proactively adopting the concept of moveable corridors in the Forest Plan will save many expensive administrative headaches in the future, especially when trail maintenance is required.

## **Backcountry Areas**

**Buffalo Horn Backcountry Area** is an appropriate designation for these often visited lands. MMBA suggests that the area could be adjusted to include Windy Pass and to exclude the Lone Indian Peak triangle. A narrow moveable corridor of Backcountry Area could be used to define the Buffalo Horn and Porcupine Trails. Due to impacts from outfitters, public apprehension to a new designation and proximity to Big Sky MMBA suggests that a management plan be created upon Forest Plan completion.

**Cowboy Heaven Backcountry Area.** MMBA is relieved to know that Cowboy Heaven is being considered as a backcountry area. Many of us have ridden out there to this remote location, which is ideal for bikebacking. Trail #401 is an enjoyable trail with a sandy base, not muddy as the rest of the Madison Range is. Bicyclists have teamed up with the Gallatin Chapter of the Backcountry

Horseman several times to perform needed maintenance on trail #401. MMBA feels backcountry area status would allow that important relationship to continue.

**Lionhead Backcountry Area.** This is another area in which MMBA differs from Alternative B. Alternative E shows a Lionhead Backcountry Management Area that could be the best fit for the land, its resident creatures, and the public. We feel that the present management of Lionhead is a sweet spot. The present Travel Plan has proven that we can all get along and it has protected wilderness character. MMBA supports Alternative E for Lionhead, implying honoring our present travel plan situation and continuing bicyclist's ability to be volunteer stewards of all the Lionhead trails.

### **Recreation Emphasis Areas**

**Hyalite Recreation Emphasis Area.** MMBA supports a well-managed Recreation Emphasis Area for Hyalite. Finally Hyalite can be properly zoned and managed for the growing intensity of recreational activity brought about by the exploding population of Bozeman and Gallatin County. Hyalite is an incredibly special area with it's beauty, adjacency to wilderness quality lands, wildlife, areas of intense recreation, paved road, and close proximity to the fastest growing city in Montana. Hyalite shows promise to serve and be loved by literal hordes of people, but it must be actively managed. Recreation Emphasis Area would set the stage for future management adjustments. We would even support a fee system for Hyalite, with day passes and annual passes to help finance improvements, management, and enforcement. MMBA feels that Alternative B boundary is the sweet spot. Alternative C, extending Recreation Emphasis Area management into Bozeman Creek and South Cottonwood Creek isn't necessary because those areas don't have the intensity of people and access that Hyalite does. Bozeman Creek and South Cottonwood Creek do have some issues that can be solved by normal Forest Service methods. Hyalite is the busiest area in the Custer Gallatin National Forest. Possessing an inadequate trail and facility system, being used as the back yard playground for the fast growing Bozeman, **MMBA suggests that a management plan be created upon Forest Plan completion.** In addition to Friends of Hyalite, other non-profit and civic clubs would like to contribute to and benefit from a well managed Hyalite Recreation Emphasis Area.

**Storm Castle Recreation Emphasis Area.** This area contains a large amount of forest roads and ATV routes. MMBA believes that the area has room for further recreational development such as more motorized and non-motorized singletrack trails and possibly even a small-scale ski area. Because Bozeman and Gallatin County are growing at an astonishing rate, consider adding Storm Castle REA to Alternative B. One weakness to overcome is poor access to Little Bear and inadequate trailhead facilities.

## Recreational Opportunity Spectrum

The Recreational Opportunity Spectrum maps, while matching the current Travel Plan, don't provide flexibility to add any new motorized routes. This will be particularly problematic in the Recreation Emphasis Areas. The public is also unaware of these maps because the maps aren't provided for review unless we have access to viewing technology. Our reduced ability to view the ROS maps is likely insufficient to satisfy NEPA transparency. These maps should be as easily viewable as the Alternative maps. The ROS maps could be abused as only CGNF personnel can view them, therefore the ROS maps should only be a suggestive guide for new decisions.

### 2.4.16 Recreation Settings Recreation Opportunity Spectrum (ROS)

Desired Conditions (FW-DC-ROS)

**Reference:** "03 Primitive recreation opportunity spectrum settings (summer) encompass large, wild, remote, and predominately unmodified landscapes. Primitive settings often provide secure wildlife habitat, naturally appearing vegetation, clean water, may contain the unit's most intact ecosystems and often coincide with designated wilderness. Primitive recreation opportunity spectrum settings contain no motorized recreation. They provide quiet solitude away from roads and people, are generally free of human development, and facilitate self-reliance and discovery. Historic structures such as administrative ranger stations are occasionally present. Signing and other infrastructure are not prevalent and constructed of rustic, native materials."

MMBA agrees with this desired condition, but the draft then contains this conflicting statement that includes mechanized:

### 2.4.17 Primitive Recreation Opportunity Spectrum Settings (ROSP)

**Suitability** (FW-SUIT-ROSP)

01 Motorized and mechanized recreation travel is not suitable in primitive settings.

MMBA asserts that no developments are required to accommodate bicycles. Mountain bikers value the land for its large, remote, wild, and predominately unmodified characteristics found in Primitive ROS as described in the DEIS. Cycling is sustainable recreation and our use is not incompatible with any of the desired conditions. Primitive ROS, while used exclusively in this DEIS for designated wilderness settings could also be used for other areas such as roadless areas or Backcountry Areas. As written, Primitive ROS could be used to exclude bicycling from areas outside of designated wilderness. MMBA proposes changing the Primitive ROS suitability to read:



**“Motorized and mechanized recreation travel is not suitable in primitive settings within designated Wilderness or other areas which exclude their use.”**

**Reference:** FW-SUIT-ROSSPNM-02 Mechanized recreation travel (bicycles) is suitable on designated routes and areas in SPNM settings.

MMBA understands that bicycle travel is appropriate in Semi-primitive non-motorized settings but we believe this statement to be problematic in several ways. Primarily we are concerned that this could be interpreted to mean that bicycles must stay on designated trails and not venture onto other user created routes. We would support a desired condition that no user built or otherwise unplanned trails are created in any ROS. User-built trails are not a problem specific to mountain bikes. We think this clarification would better serve by saying:

**“Mechanized travel (bicycles) is suitable in SPNM settings.”**

## **Key Linkage Areas**

The addition of Key Linkage Areas and associated restrictive management is problematic in many ways. Primarily the management edict, “Construction of new permanent facilities or structures such as roads, trails, campgrounds, powerlines, etc. would generally not be allowed...” is immediately problematic for the Gallatin Key Linkage Area and Bridger Key Linkage Area as well. Key Linkage management should not have a hierarchal dominance over other land allocations when dual allocations are present or desired. This is setting everyone up for endless lawsuits and court battles; divisive processes that we the public wind up paying for every time. MMBA believes it is enough to identify the Key Linkage Areas, and use the wildlife movement analysis modeling as reason enough to work toward better wildlife crossings along the I-90/Bozeman Pass corridor. The Draft Environmental Impact Statement makes dubious claims about effects from permanent facilities yet is very clear about the dangers to all species that try to cross Interstate 90. The public would be the big loser if Key Linkage Area management stifled construction of needed trail connectors for the next 30 years, only to send those animals to their demise at Interstate 90. Key Linkage Area management, as proposed, would preclude fresh ideas and solutions from consideration and promote increased public frustration over long sought solutions.

Custer Gallatin understands logging and it's affects on wildlife by placing copious nuanced language explaining and justifying vegetation management in the Key Linkage Areas. But when addressing trails that could provide enhanced user experience or solve access problems, the management edict is a resounding “no

way". This biased level of understanding is unacceptable. Trail evaluation must have an equal amount of consideration as vegetation projects. We feel management of trails, people and seasons of activity will bring more wildlife security than arresting the possibility of some new trail segments.

Two trails have been long-planned as part of the 2009 Roads and Trails Improvement Project, which was an outcome from the 2006 Gallatin National Forest Travel Plan. These trail project locations are about 10 miles south from Interstate 90, the dominant barrier to wildlife. The trails would be in important habitat, but in no way would the trails affect whether or not wildlife would survive a crossing of the Interstate. Management of Key Linkage Areas should have a component that would allow for the addition of planned projects, especially projects that would have an immeasurably small impact on wildlife and habitat. The public has been counting on the improved recreation experiences these two projects would provide. MMBA suggests adjusting management of Key Linkage Area trails and roads to allow updated seasonal restrictions that would close those new trails and others when appropriate for wildlife connectivity.

From the 2006 Travel Plan Record of Decision dialog for Bozeman Creek is this statement by Forest Supervisor Rebecca Heath, "My decision includes an objective (Objective 1-2) to provide non-motorized trail links into the Hyalite drainage and to the Bozeman urban trail system for foot and mountain bike use." MMBA notes that at this time, 13 years into the future, the Custer-Gallatin National Forest still hasn't begun to plan for these needed connectors. These connection objectives between Bozeman Creek and Hyalite would by necessity be located in a linear zone along the west side of the Gallatin Key Linkage Area, west of Bozeman Creek. Trails in this zone don't interfere with most wildlife movement traveling north-south through the Mt. Ellis sub-range, one to two miles distant. Two known routes that could possibly be developed would be a trail from Bozeman Creek water intake pond westward to the Leverich Mine, and a trail from the end of the Diaper Line road to the Leverich Mine. These urban proximity trails would be critical for the looping opportunities created. A third option would consist of an entire reroute of the inferior Wildhorse Trail #462. Moving it southward into section 12. Wildhorse Trail #462 to Hyalite is constructed at an almost impossible grade. It is a barrier to westward travel. The Gallatin Key Linkage Area management, as proposed, would preclude needed improvements to Bozeman Creek-Hyalite front-country trail connections for an indefinite period. Meanwhile any wildlife we wouldn't impair could still be dying on Interstate 90. Clearly the elephant in the room is I-90, not quiet public recreation trails.

Over 10 years ago, Spring rain events ruined the failing New World Gulch Trail and Custer Gallatin National Forest still hasn't addressed the issue of the required rerouting. The trail is substandard, eroded, and quite unsustainable. The most practical reroute option would be to construct a ½ mile connector from upper Moonshine Gulch over to the new logging road matrix on State Land in section 2. Yet this option could arguably be the definition of wildlife connectivity impairment under the proposed management for Key Linkage Areas. Thank

goodness most of this route would be on State land! MMBA suggests that Key Linkage Area management have project evaluation criteria allowing solutions and discussion to come forward.

Ironically the Gallatin Key Linkage Area contains quite a few old legacy trails that aren't official system trails. These trails, seemingly unknown to planners, don't presently interfere with animal movements. It's absurd to think that if one of those were suddenly deemed a new system trail, wildlife linkage could then be negatively affected.

For the last 20 years a goal of Roads and Trail managers has been to create a public route along Pine Creek, connecting East Bridger Trail #538 to Stone Creek Trail #504. This connection would of course be a phenomenal addition to the Bridger-Bangtail trail system. Barring that connection, staff has expressed in past meetings a desire to terminate Trail #538 with a singletrack loop in section 12 below Bridger Peak. This loop would greatly enhance user experience in the absence of the long sought Pine Creek connector. Section 12 lies in the Bridger Key Linkage Area. Language banning new trails in Key Linkage Areas would snuff out the possibility of this improvement and also even ban the possibility of creative discussion. Custer-Gallatin missed the chance to create the Pine Creek connector easement when the C-A ranch changed ownership a few years back. By not creating the Pine Creek connection the need for a singletrack loop in section 12 persists. By the way, the official map showing trail #538 is incorrect, placing the trail onto the alignment of forest road 3200, a separate route, which is off by ¼ mile or more from the actual trail!

While the public is beginning to sort of grasp the concepts of some of the Alternatives, we are afraid that the majority of the public has no idea of the actual gravity of the Key Linkage Areas and how management of those areas will impede improvements to our inferior trail system for the next 30 years or more. MMBA feels the Forest Planning open houses haven't adequately conveyed this unyielding management concept. Proposed management of Key Linkage Areas should be relaxed simply due to the lack of effective communication the public has received.

MMBA feels that restricting trail development will not create a measurable effect on wildlife migration while hamstringing thoughtful additions of new trail segments to complete 2006 Travel Plan desired conditions. MMBA speculates Key Linkage Area restrictions could inadvertently promote proliferation of user created trails. We feel it would be better to build needed trail segments and then seasonally manage those segments rather than to risk having more unmanaged user created trails.

Seasonally closing trails during times of known migration would be prudent, a much more desirable method than not completing the Travel Plan goals.

MMBA would like Custer Gallatin National Forest to modify the management language for Key Linkage Areas to allow for careful evaluation and accommodation of projects such as we described here. The Forest should recognize that adherence to a restrictive management policy could foster many negative consequences while allowing wildlife deaths along the Interstate Highway corridor to continue. MMBA suggests two solutions. One would be to entirely drop any special management restrictions for the two Key Linkage Areas, or to drop the Key Linkage Areas altogether as in Alternative E. MMBA strongly believes that the most beneficial use of the Key Linkage Areas would be to enable a process leading to Interstate Highway wildlife crossing improvements along the I-90 corridor from Rocky Creek to Bozeman Pass. Since at this time we are having to make a choice between alternatives, we have to choose Alternative E, and it's lack of Key Linkage Area restrictions, when referencing wildlife connectivity.

#### **2.4.33 Emerging Recreational Technologies (RECTECH)**

Introduction: Recreational products are likely to emerge over the lifetime of the forest plan. Some will be prohibited under existing regulations, other new uses may be unspoken to by current direction.

Desired Conditions (FW-DC-RECTECH)

01 New recreational technologies contribute to visitor enjoyment and experiences, consistent with recreation settings.

Goal (FW-GO-RECTECH)

01 New recreational technologies are integrated into the Custer Gallatin with support and guidance through the involvement of a community of interests

Guideline (FW-GDL RECTECH)

01 To blend new facilities with existing settings, use of new recreational technologies not currently authorized may be allowed when new facilities needed to accommodate these technologies are available per the development class of the associated recreation setting.

MMBA approves of this part of the draft plan. New and emerging recreation technologies are an unavoidable part of our human experiences. Sometimes these technologies can be unwelcome and sometimes these technologies make all the sense in the world.

We assert the addition of another guideline is needed addressing that the Custer Gallatin National Forest strive to make efforts to address emerging technologies in a timely manner, and without prejudice. For example, a glaring example of stonewalling persists around the topic of winter fatbiking and where it could be allowed, making Custer–Gallatin arguably the most regressively managed Forest in the Northern Rockies. Fatbikes became mass produced in 2006, the year of the Gallatin Travel Plan completion. Yet at this time 13 years later the Forest

refuses to evaluate ongoing pleas and suggestions from bicyclists, asking to modify winter travel plans to allow bicyclists to ride on appropriate trails. In fact, if state law hadn't changed to allow bikes onto snowmobile trails there would be almost no place where fatbike activity could logically occur. **MMBA strongly suggests that an additional guideline be added because the Forest has not acted in a timely or non-prejudicial manner regarding fatbike access issues. This guideline should address how timely and non-prejudicial the Forest should be when addressing impacts and uses of emerging technologies.**

Another emerging technology is electric assist bicycles. These bicycles are being marketed at most bicycle shops in Montana. These low powered bikes have potential to be highly divisive but also great fun and highly beneficial for many people including C-G administrative personnel. The current quandary is that these bikes are sequestered to motorized trails only, and many electrically assisted bicyclists wish to ride non-motorized trails with friends and family. The growing use of this product class will demand that Custer-Gallatin National Forest take an in depth look at how to use the bikes and where they are appropriate.

Can evaluation and policy change be performed in a timely manner and without prejudice? We hope so, but it's almost too late. Even with Desired Conditions, Goals, and Guidelines, the Custer-Gallatin track record regarding Emerging Technologies is dismal and the public deserves better.

Thank you for your thoughtful consideration and your diligent work on behalf of our public lands.

MMBA Executive Officers:



Bob Allen, Co-president  
Secretary



Estela Villaseñor, Co-president



Greg Beardslee,

Montana Mountain Bike Alliance  
P.O. Box 7023  
Bozeman, MT 59771