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

May 23, 2019

Custer Gallatin National Forest Plan Revision Team,

Mountain Bike the Tetons wishes to submit the following in public comment on the Custer Gallatin National Forest Plan Revision. We appreciate the opportunity to participate in the NEPA process in this case as it pertains to mountain biking opportunities in a specific region of the Custer Gallatin National Forest.

Mountain Bike the Tetons strives to act as a local voice for mountain biking in support of our mission - to enhance recreational and economic opportunities for the Teton region through development of our outstanding mountain biking resources. This voice pertains to many things beyond access and trail advocacy (including education, outreach, trail ethics, etc.). This trust has been earned and established over a long period of time, through the hard work and persistence of a number of dedicated folks. With this responsibility, endowed by our generous members, donors, volunteers and supporters, we feel that often it is appropriate to engage in some matters that might impact our community which may take place in areas adjacent to our backyard.

Mountain Bike the Tetons (MBT), is a 501c (3) status organization and an official chapter of the International Mountain Bicycling Association (IMBA), based in Driggs, Idaho. We represent countless regional mountain bikers through the direct efforts outlined in our mission.

MBT wishes to focus these comments on a region of the Forest, specifically the 17,983-acre Lionhead Recommended Wilderness Area. The Lionhead is home to a unique network of mountain bike trails that offer recreational and aesthetic benefits that are not attainable on other trails in the region. The opportunity to ride pristine single-track in such a beautiful alpine setting is extremely rare. Many of us here at MBT have travelled widely, mountain biking across the globe, and we believe the Lionhead region to be one of North America's premier alpine mountain biking areas. Many folks in the Teton region enjoy riding in SW Montana, specifically in the Lionhead area of the Custer Gallatin National Forest. Thus, after a careful, thorough review of the recent proposed action documents of the Custer Gallatin National Forest plan revision, we saw an opportunity to contribute to the process.

MBT strongly believes in the established process of decision-making when it comes to management of our public lands. We do not believe that mountain biking belongs everywhere, regardless of circumstance - although trails are our lifeblood. We believe in a balanced approach to managing for mountain biking on public lands alongside other uses where it is appropriate and that its importance does not supersede other uses, ecological value or where legitimate stakeholder concern deems it inappropriate for specific reasons. Rather, we believe that it has a place in areas where a collective decision can be made to successfully manage for mountain bike use concurrent with other significant uses and

values and in accordance with the law. Our role as advocates in this arena means that we must identify and agree on a purpose and need for specific action first and then utilize our resources to speak with conviction to that action.

Within this stance, we strongly believe that wildlife and mountain bikers can coexist peacefully. Often times, this coexistence requires seasonal restrictions or other administrative action but in the grand scheme of things, we do not believe that mountain bikers exude no more disturbance on wildlife than hikers or equestrian users. An exhaustive research review, recently conducted by the board and staff at the group Mountain Bikers of Santa Cruz (MBOSC) has provided a number of excellent resources on this particular topic (<http://mbosc.org/2019/04/introducing-mtb-impact-review/>). Simply put, we strongly believe that given this research and given the position of the Gallatin Forest Partnership, bikes belong in the Lionhead.

Mountain bikers have been constructing legally sanctioned trails and maintaining these and other existing trails in the Lionhead since 2006. Many of our MBT members have assisted with these trail work days over the years and make regular trips to the region to work alongside the Southwest Montana Mountain Bike Association with these projects. This work is a shining example of collaborative stewardship as multiple stakeholders (mountain bikers, horseback riders and motorized user groups) have worked together build and maintain trails in the area. Within this spirit, we broadly support the Gallatin Forest Partnership and its collaborative approach to addressing issues on the CGNF through their mutual connection and passion for southwest Montana's Gallatin and Madison Ranges.

MBT believes that managing the valuable Lionhead area as "Special Management Area" (SMA) or a "Backcountry Area" (BCA) as described in Alternative E of the Forest Plan Revision is best. Administrative management prescriptions that would maintain the Lionhead's position on the Recreation Opportunity Spectrum while preserving the ecological characteristics and value of the area can best be attained through management as a SMA or BCA: we believe that these are the most consistent methods to keep things the way they are now, maintaining bike access. Other alternatives mentioned in the Plan leave part or all of Lionhead closed to "mechanized travel" like mountain biking. As mentioned previously, we value the rugged, remote, natural feel and do not feel that mountain bikers degrade this character in any way by simply riding a bicycle there. If anything, mountain bikers have left the area better than we found it, volunteering thousands of hours of trail work over the years.

Outside of the Gallatin Forest Partnership Agreement Area, we believe managing these areas to exclude bikes (described in alternatives C and D) is unacceptable and could remove our preferred way of accessing an enormous portion of the forest. Alternative D would effectively create many new Recommended Wilderness Areas (RWAs) and remove bicycles from hundreds of miles of trails across the Forest. Specifically, 256 miles of trails currently available to bikes, plus 172 which mountain bikers share with motorized use, plus any rides that become shortened to the point of no use. This would include trails such as Sypes, Truman, Middle Cottonwood, South Cottonwood, Mystical Bear and more. This would concentrate use on the Forest in front country areas and degrade the experiences of cyclists and other recreationists alike. MBT believes that Bikes Belong.

Mountain Bike the Tetons thanks you for the opportunity to participate in this process through submission of public comments on the Custer Gallatin National Forest Planning Revision – Proposed Action. Please do not hesitate to reach out to us with any questions or comments.

Regards,



**Tony Ferlisi**

Executive Director, Mountain Bike the Tetons