

The Custer Gallatin National Forest (CGNF) is an immense area, managing it efficiently and effectively are a balancing act that should be commended. With shrinking federal budgets for public land management, increases of recreation on the forest, and astronomical growth in communities surrounding the forest, it is imperative that access to the forest and common-sense management decisions are a key part of the forest plan. It is my belief that through novel management strategies, the CGNF will be able to not only create a proactive forest, but a forward thinking management scheme. The National Forest Service is in a period of transition, as timber sales wane in our area, and recreation expands, it is imperative that the focus of the forest change from purely vegetation management and sales, to recreation management and income generation from that. Throughout this comment, I choose to speak of “recreationalists” loosely, when I use this word, please infer that I mean the entire range of recreation from one-time visitors, one-time photographers, one-time viewers from overhead planes, those who will never see the forest but wish to conserve it’s values, all the way to folks who hike, bike, ski, fish, hunt, horseback ride, and camp daily on the forest. Recreation is all of it, whatever provides humans with happiness, and this most certainly includes conservationists who derive happiness from the plentitude and stability of the ecosystem. I do not mean simply the people going out to exercise on the forest.

Novel management strategies require strong science and data-based solutions which balance the forest’s key attributes that draw people to recreate, and the recreation which they do on the forest. To do this requires a fine balancing act between protection of resource quality and enablement of access to those resources. This balance is hard to find elsewhere, and truly requires a new and unique management scheme to be successful. The current proposed plan alternatives for the CGNF do a good job of this balance and integrate novel solutions like the Gallatin Forest Partnership Agreement (GFP) proposal and backcountry management areas such as the Lionhead and Henry’s Lake Mountains as described in the Outdoor Alliance Montana (OAMT) proposal. These key novel solutions for management will pave the way for future designations and congressional action.

The OAMT proposal calls for a number of recreation-centric designations ranging from Recreation Emphasis Areas to Recommended Wilderness based on the primary form of recreation (or extent of recreation) of the area in question. Key among these are the Lionhead, Henry’s Lake Mountains being managed as a Wildlife Management Area with wildlife and recreational monitoring and adaptive management policies based on the data generated from that monitoring. This is a primary concept of this area, allowing for semi-primitive non-motorized recreation across the entire Henry’s Lake Mountains including the high-alpine lakes, passes, and drainages that are of paramount concern for the cyclists, horsemen, and hikers who frequent the area. Based on best available data, a baseline should be established for wildlife livability and diversity, from which management decisions should be made regarding access for recreationalists. For example: if a marked decline of the non-native but still valuable Mountain Goat is determined to be occurring due to recreational access during a certain time of year, a seasonal closure for all access should be implemented to ensure the continued success of this species. The same can be extrapolated for other large herbivores. Large carnivores or apex predators should be managed similarly, but no management should be taken outside of existing policy regarding these predators in compliance with the Endangered Species Act.

The Henry’s Lake Mountains represents a unique and unparalleled recreational experience for cyclists, representing some of the last high-alpine recreation within the entire CGNF where users can cross a

continental divide, see a scenic alpine lake, and experience greater than 10,000' altitudes all within a single ride. The Mile Creek to Sheep Creek ride is considered to be a Critical Recreation Corridor for cyclists. The Continental Divide Trail is also considered a Critical Recreation Corridor for cyclists. The entire Henry's Lake Mountains is considered to be a Critical Recreational Experience for cyclists due to the proximity of these two Critical Recreational Corridors. Access to all alpine lakes, mountain passes, and drainages which are currently open to cyclists must remain open, or the unique and vibrant experience provided by this range is threatened. Cyclists represent the primary source of maintenance for this trail network, and the loss of their access directly impedes the ability of the CGNF to maintain these trails, threatening use by other groups such as hikers, equestrians, and hunters. The OAMT proposal calls for this area to be managed similarly to how the Porcupine-Buffalohorn Wildlife Management Area is described within the GFP Agreement.

Also among the OAMT proposal, the Gallatin Forest Partnership Agreement (GFP) proposal is of primary concern for the conservationists, recreationalists, and locals living amongst and around the Gallatin Range. Key areas of primary concern for me are the opening of the West Pine Backcountry Area for semi-primitive, non-motorized use and the focus of re-opening the Eightmile Trailhead via use of the historical easement for this trailhead. The Eightmile Creek Trail represents one of the last remaining low-grade creek-side trails in excess of 3 miles in length within Paradise Valley outside of Recommended Wilderness, and Congressionally Designated Wilderness. Once managed as a Backcountry Area which accepts cyclist use, this will quickly become one of the only green circle (easy) cyclist ride opportunities in the Livingston and Paradise Valley Area. The addition of the Dry Divide to Bear Lakes proposed trail would enable the Eightmile drainage to connect seamlessly to the Hyalite Watershed and Recreation Protection Area, thus enabling cyclists, equestrians, and hikers to easily traverse from Paradise Valley to Gallatin Canyon on trails. This represents a Critical Recreation Corridor, and directly contributes to the CGNF being able to handle larger number of recreational access across the forest by enabling diffusion of recreationalists.

Along the same lines as the West Pine Wildlife Management Area (labeled backcountry area in Alt C), the Hyalite Watershed and Recreation Protection Area is of primary concern for me. The lack of front-country trails along the Gallatin Front just south of Bozeman results in massive loading of recreation within the interior, compounded by the ease of access from the Hyalite Road. To ensure better conductivity and permeability of recreation along the edges of the range, frontcountry access and trail development should be a primary focus of the forest plan. Enhancing trail opportunities in the Moser and Lick Creek areas as well as bolstering of the Bozeman Creek to Hyalite Creek connections will enable further dispersal of recreationalists and enhancement of the experience of these individuals. An added benefit of recreational dispersal is the lower impact on wildlife and the ecosystem as a result of this use. The analogy of the forest being a sponge is quite apt, lending to the idea that the forest requires a certain ability for recreation to access the outer areas of the forest so that the quantity of recreation remains outside the core, enhancing the existing wildlife connectivity and maintaining habitat for the species which these recreationalists have determined they enjoy seeing. Enhancement of front-country recreation will directly enhance backcountry habitat, and that is a key concept for the FS to manage for.

When seasonal or other closures are established, I would like to see them established for all humans, not just certain groups of humans. There is no quantifiable data regarding the impacts of different user groups which can be adequately reproduced to provide scientific credence to the opinion that any one user group impacts

wildlife more than another. This is a monumental concept the FS must recognize to ensure that user groups and other special interest groups are not arbitrarily or capriciously removed from their public land on the opinion of extremists. The use of qualitative data within management is not fair to the millions of people paying to ensure our public lands are managed to their highest and best uses. Whenever possible, the Forest Service should partner with outside organizations such as Universities, Nonprofits, User Groups, State Agencies, and other entities to collect data regarding quantifiable use and maintenance of the forest. This hard-data can be used to inform management decisions and better explain to people the resulting management better than superfluous and arbitrary studies focusing on qualitative data. Additionally, these partnerships can be used to better inform and educate the public on concepts leading to management, ensuring better enforcement of the management plans.

Outside of the OAMT and GFP proposals, I want to see Recommended Wilderness accessible to semi-primitive non-motorized recreationalists especially if such recreation already exists on the area in question. These quiet recreational endeavors directly contribute to the love of the forest and desire to protect it the way it is. Removing use of these advocates, directly affects the future ability of permanent protections being applied to any given area by creating a permanent constituency of disgruntled and disenfranchised special interests. Whenever possible, the Forest Service should work to encourage, engage, and embrace users on the forest. Exclusionary policies, like the consistency doctrine being practiced in Region 1 when it comes to excluding cyclists from Recommended Wilderness, do not protect that landscape for future protection, especially given cyclist's expected life expectancy is between 60 and 90 years and the average age hovers around 35 years old. The removal of these users builds an advocacy group which will not support future designation for over 50 years. Additionally, advocacy organizations will live much longer than individual advocates, with the average age of cyclist advocacy groups consistently increasing year over year, and the advocates composing these groups easily educating new members to maintain the organizational policies long into the future. It should be expected that any Recommended Wilderness Area outside of the GFP or OAMT proposals on the CGNF will never become Congressionally Designated Wilderness, especially if cyclists are removed from any trails within that area. This does not work in the Forest Service's favor, and directly impinges the ability of the agency to manage these public lands indefinitely. The Forest Service should, instead, focus on ensuring partnerships such as the GFP and OAMT continue to focus on collaborative efforts to protect land and ensure the future of the forest is protected.

Finally, I believe that Bikes Belong. Whenever possible, I believe the Forest Service should make every attempt to partner with and improve relations with the cycling community. Cyclists represent one of the fastest growing and most dedicated user groups on the forest, with the average age of cyclists continually decreasing and numbers of cyclists continually increasing, they exemplify the qualities which the FS should be championing in a user group. Cyclists dedicate more time per user to stewardship of the trails and public land of the Forest Service than any other user group with similar demographics. While other user groups are growing older both nationally and locally, cyclists represent the ideal replacement for future agency partnership and land stewardship. Every effort should be made to further user access, partnership, and stewardship of cycling on the CGNF.