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Comments on the Custer Gallatin NF DEIS and related documents

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INTRODUCTION

SWMMBA submits these comments on behalf of itself and its member constituents, primarily comprised of mountain bicyclists in the Southwest Montana region. The efforts of SWMMBA in developing, maintaining, and promoting trails throughout the area benefit not only bicyclists, but all users who have access to those trails.

Just as SWMMBA trail efforts benefit all users, so too has SWMMBA sought to engage other users and groups in discussion about the forest plan revision. SWMMBA has participated in the Gallatin Forest Partnership. This is a multiuser group with some similar and some diverse interests, which has come together to reach an agreement for the Gallatin Range and some surrounding areas.

SWMMBA hereby endorses the Agreement of the GFP. SWMMBA is proud of the efforts of the GFP, and hopes that the CGNF Forest Planning Team takes into account the collaborative nature of the partnership when considering its plan revision.

We are also a part of Outdoor Alliance Montana, which supports the GFP agreement and includes other areas of agreement which are generally around human powered recreation and conservation. Areas not covered by these agreements or further details about management are where SWMMBA focuses its comments.

COMMENT 1 - Recreation and ROS

Reference: FW-DC-ROS-03 Primitive recreation opportunity spectrum settings

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.

Reference: FW-SUIT-ROSP-01 Motorized and mechanized recreation travel is not suitable in primitive settings.

No developments are required to accommodate the use of bicycles. This line should be removed or modified to clarify that mechanized travel is not suitable in designated Wilderness areas which should have a Primitive ROS or other areas where mechanized is prohibited.

Primitive ROS has never excluded or addressed mechanized travel and was not designed to be a travel planning tool. Applied broadly as it is written, this could later be used as a tool to circumvent the Wilderness Inventory and Analysis steps and unjustifiably remove mountain bikes from large pieces of land. We do appreciate the fact that the DEIS maps mostly use this category for DWA and RWA in alternatives that manage for to exclude nonconforming wilderness uses. An exception is found along the east side of Paradise Valley between Pine Ck and Mill Ck. The boundaries of designated wilderness are not meant to create a buffer that extends beyond the boundary.

We suggest changing **FW-SUIT-ROSP-01** 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-ROSPNM-02 Mechanized recreation travel (bicycles) is suitable on designated routes and areas in SPNM settings.

We find this language to be unclear. Calling it “recreation” travel seems unnecessary in a section about recreation. The purpose of travel is not usually a component of forest planning unless it deals with access of private inholdings or grazing permits. Other forest plans phrase it “mechanized travel”.

The second part involves “designated routes and areas”. While not explicitly stated, we assume that this is based on the issue of nonsystem trails. User built trails are not a problem specific to mountain bikes, as is recognized in the DEIS. This suitability requirement, while not stating the converse, seems to indicate that mountain bikes need to stay on system trails. “Designated areas” is not clear. It could refer to SPNM as a whole, in which case it is redundant.

We suggest clarifying **FW-SUIT-ROSSPNM-02** in the following way:

Mechanized travel, including bicycle use, is suitable in SPNM settings.

Another possible issue with SPNM is found in the Desired Conditions

Reference: FW-DC-ROS-06 Semi-primitive nonmotorized settings (winter) provide backcountry and Nordic skiing, snowboarding, and snowshoeing opportunities. Trails are generally un-groomed and not marked for winter travel.

DEIS page 685 states: For winter recreation opportunity spectrum in all revised plan alternatives, groomed cross-country ski trails are mapped as semi-primitive nonmotorized.

It seems that “generally un-groomed” leaves room for exceptions, perhaps that is best way to tackle the issue. The Agency should carefully consider which ROS category is intended to contain groomed trails. Sourdough is one example which goes far into the backcountry but is groomed.

Reference: Pg 667 DEIS. An unknown number of unauthorized routes exist throughout the Custer Gallatin National Forest, created by users to access firewood, campsites, hunting areas, or for game retrieval. Since these are unauthorized, the routes are slated for removal when identified.

Unauthorized routes are addressed in the DEIS, reference above. It seems that this covers the issue, but we would likely support similar language under RWA or specific Geographic Areas of concern where cross country travel could damage resources as is done with Line Creek Plateau, mentioned below in comment 4.

We appreciate and support the sections which address fat bikes and clear language which identifies trail class, appearance and development levels in relation to ROS.

Comment 2 - RWA

Reference: FSH 1909.12, Chapter 74.1

SWMMBA respectfully submits that CGNF should follow the orderly sequence of strategies and guidelines as set out in the Forest Service Handbook. In particular, the management strategy applied for Recommended Wilderness here can be less restrictive, while achieving its goals. There are several management strategies described in the Forest Service Handbook, many of which do not require prohibiting mechanized travel, particularly where it has been allowed historically. Again, we urge the agency to use adaptive management and not remove bicycles until they are shown to reduce wilderness character.

Reference: HOUSE OF REPRESENTATIVES- DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS BILL, 2019 [P.69]

Wilderness Area Management.—The Committee recognizes that the management of National Forest System land recommended as wilderness is not consistent across all regions nor are the full spectrum of adaptive management steps, as provided in the Forest Service Handbook Chapter 70, consistently utilized to maintain existing uses to the extent possible. While the Service is required to protect the characteristics that provide the basis for a wilderness recommendation,

the Committee encourages the Service to allow and manage existing uses, to the extent possible, utilizing all the adaptive management steps provided in the handbook, so that such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for a wilderness designation.

The Committee also encourages the Service to fully consider historic uses that have been prevented in previous decisions that can be managed utilizing adaptive management, as appropriate.

Reference: SENATE-DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS BILL, 2019 [P. 83]

“Recommended Wilderness.—The Committee recognizes that management of Service land recommended as wilderness in forest plans is not consistent across all regions, nor are the full spectrum of adaptive management steps, provided in the Forest Service Handbook Chapter 70, consistently utilized in plan components to maintain existing uses to the extent possible. The Committee recognizes the Service is required by statute to protect the characteristics that provide the basis for wilderness recommendation.

The Committee encourages the Service to allow and manage existing uses, to the extent possible, utilizing all the adaptive management steps provided in the handbook, so that such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation.

The Committee also encourages the Service to reconsider historic uses that have been prevented in areas recommended as wilderness that otherwise can be managed utilizing the adaptive management steps provided in the handbook so that they do not permanently harm the social and ecological characteristics that provide the basis for wilderness designation.”

Many of the values of recreation are listed throughout the planning documents such as public health, contribution to the local economy and culture as well as opportunities to connect with nature. It is critical that management be adaptive. Removing access for a growing group of forest users should only be considered if it is needed to protect a resource. All steps of adaptive management should be utilized before such a serious decision is made. Mechanized travel should not be restricted absent a finding of significant negative impacts. The Outdoor Alliance study of economic impact is attached.

The effects of confining recreation are widespread. Management with large quantities of RWA found in alternative D would confine and concentrate uses such as cycling and motorsports. Managing for multiple uses as a whole forest is critical. Each area where mountain bikes are allowed is extremely important because so much of the surrounding area is off limits. Designated Wilderness, National Park and access across private land all restrict our use in Southwest Montana. Management under alternative D would block a significant amount of mechanized access and opportunity to meet growing demand. For example, within a 25 mile radius of Bozeman, 63 miles of trail would become inaccessible to mountain bikes under alternative D.

A recent example, the Colville NF Land Management Plan (page 150) allows mountain bikes and chainsaws to be used in Recommended Wilderness. If monitoring turns up a problem such as new user built trails, use will be limited. We encourage CGNF to consider this style of management.

As we mentioned in our introduction, we are members of the GFP and fully support the agreement. The management for the Gallatin, Cowboy Heaven and Taylor Hilgard RWAs should exclude mechanized and motorized use.

Reference: F.S. Roadless Area Conservation FEIS, at 3-238 (Nov. 2000)

Some of the key characteristics of inventoried roadless areas lie in their unique Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized recreation opportunities. Activities that are prohibited in designated Wilderness areas and that are

not readily available in areas with classified roads can occur in inventoried roadless areas. These areas provide popular, appropriate alternatives to Wilderness areas because, although they contain many Wilderness attributes, a wider range of recreation opportunities with fewer restrictions is available.

Most, if not all, of the Recommended Wilderness Areas are already designated as Inventoried Roadless Areas (IRA). Those areas serve as an important transition between lands with road-based resource management activities and lands affected substantially by natural processes. Alternative D would leave only 4% of the forest in SPNM setting, which represents an unacceptable impact to mountain bike access.

Comment 3 - Lionhead

This area is of the highest value to mountain bikers in our area. We have put in countless hours maintaining the trail and have noticed no damage from our use. During the short, alpine summer of every year we leave it better than we found it.

We support the conditions for Backcountry Areas as described in **2.4.46 Backcountry Areas (BCA)**. SWMMBA finds that this is the best management for the Lionhead area as described in the maps for alternative E. One BCA covering most of the range is the most straightforward management and maintains existing access.

Reference: MG-DC-CDNST-05 The trail is well maintained, signed, and passable. Alternate routes provide access to the trail in the case of temporary closures resulting from natural events, such as fire or flood, or land management activities.

Reference: MG-SUIT-CDNST-04 The Continental Divide National Scenic Trail is suitable for mountain biking.

**Reference: 3.7.19 Plan Components–Lionhead Backcountry Area (LHBCA)
MG-SUIT-LHBCA-01 The backcountry area is suitable for nonmotorized and for mechanized recreation use.**

Cyclists greatly appreciate our access to these portions of the CDT. We are good stewards of the land and trails, clearing deadfall, fixing signage and drainage. We fit right in with the desired condition that the trail is well maintained and the suitability of mechanized use as described in the sections on CDTNST and Lionhead Backcountry Area.

Comment 4 - Line Creek Plateau

We support the language about Line Creek Plateau, especially **AB-SUIT-RNA-03: Mountain biking is only suitable on system trails.**

This will maintain the integrity of the research area and is an example of a specific place where cross country travel is not compatible with the resource. It also recognises that these trails are valuable to the mountain bikers who appreciate its unique and remote feel. These trails are some of the only true alpine experiences for mountain bikers in the region, which is largely surrounded by Wilderness, Park and checkerboard.

Comment 5 - Ski Areas

References: Page 106 (FW-DC-RECSKI)

01 Ski resorts provide a range of winter and summer activities to meet a range of public recreation desires.

02 Activities such as zip lines, alpine slides, and downhill mountain bike trails with infrastructure are available at existing downhill ski permit areas.

We support the desired conditions and guidelines regarding mountain biking and ski resorts. These areas already have noticeable human impacts and are appropriate for higher levels of development. The ROS maps agree. SWMMBA is in contact with Bridger Bowl to discuss how future development might look on private and public land in that area.

Comment 6 - Emerging Technology

Reference: Page 109: 2.4.33 Emerging Recreational Technologies (RECTECH)

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.

Emerging Technology is a good idea to consider in the Forest Plan. We also recommend adding:

“other new uses may be unspoken to by current direction **and some technology may fit within existing definitions.**”

This would simplify the process. For instance, this plan revision deals with drone launching in Wilderness, but it could be addressed as motorized equipment. It is best to be specific like in the aforementioned example, but adding the text we suggest may help the Agency act quicker and avoid having to address minor changes in technology which would fall into an existing category. The important thing is to address new technology and figure out where and if it fits in the Forest.

Comment 7 - Special Areas, RNA

Reference: DEIS pages 803-806. Bridger Foothills Trail National Recreation Trail

Reference: FSM 2353.51 - Policy

3. Do not establish a National Recreation Trail entirely in a wilderness area. A segment of a National Recreation Trail may be located in a wilderness area.

Please continue to manage trails such as National Recreation Trails and National Scenic Trails to allow mechanized travel. The easiest way to accomplish this is to avoid creating RWA that overlap them. Management under alternative D would remove bicycle access unnecessarily from parts of Bridger Foothills and CDNST. Furthermore, a National Recreation Trail does not belong in Wilderness. Alternative D would put Bridger Foothills almost entirely in RWA, which would be in conflict of both designations.

Comment 9 - Roads and Trails, partnerships

References: FW-DC-RT-05 The trail system accommodates current and reasonably foreseeable recreational demands and ability of the Forest Service to provide sustainable maintenance through volunteer, partnership, or agency resources

Strategically engaging volunteers and partners to prioritize and complete deferred maintenance and to engage in resource stewardship and restoration; and exploring partnership opportunities with user groups and seek reliable information sources outside of the agency to improve data collection and data management on recreation use and demand.

SWMMBA and USFS have been excellent partners so far and hope to continue this

relationship into the distant future. We are committed to continue our partnership performing trail work and stewardship. We also have an interest in sharing information and monitoring to improve management for resource protection and quality visitor experiences. Thank you for the consideration of our comments and for recognizing the growing mountain bike community.