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June 6, 2019

Mary Erickson
Forest Supervisor
10 East Babcock
Bozeman, MT 59715

RE: Custer Gallatin National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement

Dear Ms. Erickson,

The American Mountain Guides Association respectfully submits these comments on the Custer Gallatin National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement.

The American Mountain Guides Association (AMGA) is a 501(c)(3) educational non-profit organization that provides training and certification for climbing instructors, mountain guides, and ski guides throughout the United States. Founded in 1979, the AMGA has trained over 13,000 climbing and skiing guides who provide outdoor experiences for the general public that emphasize safety, stewardship, and education. As the American representative to the International Federation of Mountain Guide Associations (IFMGA), the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land management agencies, guide services, outdoor clubs, and others wishing to establish internationally-recognized standards for guided climbing and skiing activities. The advocacy arm of the AMGA supports sustainable use of public lands, facilitates stewardship opportunities, and works in cooperation with guides and land managers to promote best practices and preserve access to areas utilized by the guided public.

We have prepared the following comments in consultation with regional mountaineering and backpacking guide services and local guides who provide recreation services for the public on the Custer Gallatin National Forest and around the country.

The Value of Recreation Special Uses

Recreation special uses such as outfitting and guiding provide substantial benefits for the public, the Forest, and local communities. In an increasingly urban society, outfitters and guides connect people to the outdoors and foster an appreciation for public lands. In addition, outfitted and guided experiences provide valuable education and interpretation of natural and cultural resources. Guides help the public learn about forest resources, understand recreation niches, and

they promote an ethic of conservation and stewardship. Guides also teach Leave No Trace practices and set an example for other visitors. Recreation special uses also support local communities through a vibrant and growing recreation economy. These benefits illustrate ways in which recreation special uses act in partnership with the Forest to help accomplish Forest goals and meet desired conditions. To ensure outfitting and guiding services on the Custer Gallatin National Forest continue to provide benefits for the public, the Forest, and local communities, we offer the recommendations below.

Recommendation 1 – Remove the proposed moratorium on new special uses in wilderness

In Chapter 2, Proposed Forestwide Direction, section 2.4.36 on Designated Wilderness (DWA), subsection Guidelines (FW-GDL-DWA number 05), the following proposal is made:

05 “To protect social and ecological conditions, outfitter, and guide service days should not be increased beyond existing authorized use levels within wilderness.”

We believe this proposal should be removed from the Forest Plan for the following reasons:

1. Management by moratorium is not a best practice. It does not allow for adaptability to changing conditions on the landscape or for new uses that may be proposed during off-peak periods or in areas with lower levels of visitation. A blanket moratorium on new uses is not management, it is a closure. Additionally, this type of restriction is inconsistent with how other National Forests are managing designated wilderness.
2. Guidance from the Chief of the Forest Service in 2016 specifically requested that moratoriums on recreation special uses be lifted. In *Modernization of Special Uses to Enhance Visitor and Community Benefits*,¹ then-Chief Thomas Tidwell stated, “If there are recreation special use moratoriums in place in areas for which you are responsible, I ask that you reconsider them where appropriate.” This guidance clearly states a desire to move away from the use of moratoriums.
3. Forest plans provide direction for an extended period of time, often measured in decades. During such lengthy time periods there can be substantial changes in patterns of use, volume of use, and types of activities. Because activities and patterns of use are likely to change over the lifespan of a Forest plan, it is not an appropriate vehicle to institute a moratorium.

For the aforementioned reasons, we recommend the Custer Gallatin National Forest remove the proposed moratorium on new recreation special uses in the final forest plan. We suggest the Forest replace the proposed moratorium with language such as, “To protect wilderness character, new special use authorizations should only be authorized as consistent with the wilderness act, and in such a manner to maintain the state of existing wilderness zones.”

¹ *Modernization of Special Uses to Enhance Visitor and Community Benefits*, June 2016

Recommendation 2 – Identify opportunities for new recreation special uses in Recreation Emphasis Areas

We support the designation of areas in Hyalite and Gallatin Canyons as Recreation Emphasis Areas. We believe this designation is reasonable and appropriate for these locations that offer significant recreation opportunities and which are adjacent to a population center. In concert with this designation, we believe it would be appropriate to create additional opportunities for the public to experience these areas with an instructor, guide, class, or organized group. These opportunities could be made available within existing management considerations by directing new uses into shoulder seasons or mid-week time periods and/or limiting group size. Strategies such as these could allow additional opportunities for the public to visit with a guide while accounting for carrying capacity determinations and known periods of higher visitation.

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Thank you for the opportunity to share our perspective on the Custer Gallatin National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement. We support the overall direction of the plan although we recommend a few changes to ensure best management practices are in place to maximize benefits for visitors, the Forest, and local communities.

Sincerely,



Matt Wade
Advocacy & Policy Director
American Mountain Guides Association



Alex Kosseff
Executive Director
American Mountain Guides Association