

Comments on Custer Gallatin Forest Plan Revision from a public land owner who enjoys all non-motorized exploration. I have one particular point to drive home: NO NET LOSS IN QUANTITY OR QUALITY OF MOUNTAIN BIKE ACCESS. This means the mileage, type, and connections of single-track trails where bikes are allowed must not decrease in the new Forest Plan. In areas like the Lionhead there are high quality, wilderness riding opportunities that cannot currently be found elsewhere in the CGNF. So loss of that access is either unacceptable or must come with re-newed access to similar wilderness areas with at least as much area, trails, and connections. The simple way to do this would be for the CGNF to allow all non-motorized use in RWA, WSA, and other areas outside Congressionally designated Wilderness.

1. In general I am very concerned about the decision to exclude bicycle travel in recommended Wilderness areas and Wilderness Study Areas. There is not a shred of analysis to define what "wilderness character" in a tangible way. All good science must be based on tangible and repeatable results. How can bicycles be excluded without definition and tangible data on their effect on an undefined quality? They cannot. This exclusion has been pushed hard by anti-bike forces with loud and organized voices. I urge you to look at real results and common sense to allow equal access to our outstanding public wildlands for all non-motorized recreation. Totally support increased protection for wild areas, but that is a very tough pill to swallow when bicycles are the only recreation group told to give up their access. I urge you to consider inclusive management or other protective designations like recommending National Recreation Areas. NRA's are severely lacking in MT, less than 1% of Wilderness areas, not to mention RW's and WSA's.
2. The continued erosion of reasonable bike access on the CGNF, and other Forests in Region 1, will only enflame resentment of public lands management. Especially when trails that bikers have maintained and worked so hard with the CGNF to keep open for all non-motorized users. This investment by bike groups comes at little to zero expense to the CGNF. It is extremely disrespectful for the CGNF to even consider closing these trails in light of this. The result of closing these treasured trails to bikes is likely the loss of the partnership and possible outright opposition to CGNF actions in the future. Below are 2 common sense approaches to maintaining bike access on the CGNF and the current value of partnerships with the mountain bike community.
3. Allow Pre-Existing or Current Recreational Uses in Recommended Wilderness, Including Biking: (FW-SUIT-RWA-02 "Recommended Wilderness areas are not suitable for motorized or mechanized recreation.") The Forest Service can preserve the "wilderness character" of the landscape in recommended wilderness, while Congress (in theory) decides on the recommendation. CGNF can do this with several management strategies outlined in the Forest Service Handbook (FSH), many of which do not require prohibiting mechanized travel, particularly where it has been allowed historically. The handbook provides for the following management strategies:
 1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
 2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation;
 3. Alter existing uses, subject to valid existing rights; and
 4. Eliminate existing uses, except those uses subject to valid existing rights.

CGNF skips right to step 4. This is incongruent with the concepts of adaptive management and multiple use. That is an unnecessary leap as regards the recommended wilderness in this proposal, particularly in Lionhead. Mountain bikers value our current access to this land. We urge the Forest Service to use their adaptive management tools to continue existing uses as a first step. This process is outlined in FSH 1909.12 chapter 74. Mountain biking does not degrade the wilderness character of the landscape. There are instances of other areas that had bike access for decades and were then designated Wilderness, proving that biking does not by default diminish wilderness character. Only after all other options are exhausted and it is well demonstrated and documented that Wilderness character will be permanently damaged should the elimination of a particular use be considered. In the present case all other options have not been exhausted, and bike riding has absolutely not been demonstrated or documented to permanently damage wilderness character. Bike riding should not be prohibited in Recommended Wilderness.

4. Absent Congressionally Approved Legislation This Public Land Should be Managed Consistent with the Multiple Use Mandate: The proposed action states that no mechanized or motorized use, including chainsaws, would be allowed in Recommended Wilderness. (Reference: FW-SUIT-RWA). This makes it look just like congressionally designated Wilderness. However, only Congress can designate Wilderness, therefore recommended Wilderness should be managed consistent with the multiple use mandate until Congress acts to change the landscapes to a more restrictive and permanent designation. Land managers must not create de-facto Wilderness by eliminating uses without due process or in an arbitrary and capricious manner. Only Congress can designate Wilderness, the Forest Service should be managing the land to allow this possibility and not trying to create it themselves. Recommended Wilderness should be managed consistent with the multiple use mandate that exists for general forest service lands until such time that the Congress acts to change the landscapes to a more restrictive and permanent designation.