



June 6, 2019

Custer Gallatin Forest Plan Revision #50185
Comment received on 6/6/2019
Your letter ID is 50185-2788-8224.

Attn:
Mary Erickson-CG Forest Supervisor
Virginia Kelly-Forest Plan Revision Team Leader

Re: Comments on the Custer Gallatin National Forest Draft EIS

Submitted online at

<https://cara.ecosystem-management.org/Public/CommentInput?project=50185>

Electronically Mailed to:

virginia.kelly@usda.gov

Dear Mary Erickson-Forest Supervisor and Virginia Kelly-Forest Plan Revision Team Leader,

The International Mountain Bicycling Association (IMBA) submits the following comments on the Custer Gallatin National Forest (CGNF) Draft Environmental Impact Statement (DEIS) for the Revised Forest Plan, published March 1, 2019.

Thank you for the opportunity to participate and comment on the plan revision. We are more than impressed with the level of communication that the Plan Revision Team has created and provided through the online portals, reading room, podcasts, and the various other ways in which the team has made the information readily available to the public and easy to access and comment on. Its a model for other forests to replicate.

IMBA's mission is to create, enhance, and protect great places to ride mountain bikes. IMBA works with and through our local groups around the country to meet its own and their missions. IMBA and our local volunteers put over 700,000 hours annually into the maintenance and upkeep of trails, including clearing trees, building drainage, and repairing damage. IMBA maintains a Master Challenge Cost Share Agreement and formal Memorandum of Understanding with the Headquarters/Washington Office of USFS. IMBA's cooperation with the federal agency and its field-based staff has been long running and productive. The efforts of IMBA in developing, maintaining, and promoting trails throughout the U.S. and Montana benefit

not only bicyclists, but all users who have access to those trails and the economies of the communities that host them. Just as IMBAs trail efforts benefit all users, so too has IMBA sought to engage other users and groups in discussion about the CGNF Plan Revision. Both IMBA and our local affiliate Southwest Montana Mountain Bike Association (SWMMBA) have participated in and support the Gallatin Forest Partnership (GFP) agreement recommendations along with the Vision document crafted by our local partners in the Outdoor Alliance (OA). Both the GFP and the OA are multi-user groups that we are apart of. Both hold a matrix of similar and diverse interests, which have come together to craft agreed upon recommendations on the CGNF Revised Forest Plan. **IMBA hopes that the CGNF Forest Planning Team takes into account the collaborative nature of both the GFP and the OA Vision recommendations when considering its final plan revision. Much of IMBAs comments are captured in those agreements and recommendations.**

However, IMBA submits these more specific comments on behalf of its national and international membership. We also want to **endorse the comments of our local affiliate, the SWMMBA and again the OA Montana Vision document submitted via our national membership in the Outdoor Alliance (OA)** as we have played a role in the process of crafting them and our rationale and justification for these recommendations have been incorporated into that document. We have attached the OA Vision to these comments as Appendix A for reference. In Dec 2018, the OA Vision was shared with you and when our team compared it with the DEIS following the its publication we were pleased to find that much of what we envision for the forest is reflected in various alternatives however this requires some key modifications or combinations of alternatives to achieve. Rather than being redundant in these comments, we point you to the OA Vision for that specificity.

Below are comments more unique and specific to IMBAs interests on the CGNF

Economic Impact of Mountain Biking in the CGNF.

The CGNF serves as a riding destination for both residents and regional and national visitors. According to the *Economic Impact of Mountain Biking in the CGNF Report*¹ by the Maples Research Group conducted in 2018, mountain bikers visit the CGNF over 260,000 times per year with over 30% of the visitors living outside the CGNF and surrounding region. According to the study, non local mountain bike visitors spend an estimated \$9.1 million per year while during their collective visits to the CGNF. The overall economic value of mountain bike visitors to the CGNF directly support 111 jobs and \$3.4 million in income within the region. This is a significant contribution to the local economy and through the forest plan revision the CGNF has an opportunity to support and enhance outdoor recreation opportunities while protecting the unique values of this forest that make it such an important place for so many people. The key is balance in resource management with recreational access.

¹ Maples and Bradley 2018. The Economic Influence of Outdoor Recreation in Montana's Custer Gallatin National Forest. Available online at <https://www.outdooralliance.org/custer-gallatin-economicreports/?rq=economic>

Backcountry Area (BCA) Allocations

The DEIS has recognized that there are some areas of the Custer Gallatin that have low development and are valued for human powered recreation and therefore deserve customized management. To manage these areas in a manner that can maintain the recreational access and character requires more flexible management that can maintain the status quo of access and low level of development of the area. We are pleased to see that the CGNF has presented the concept of the “Backcountry Area” as a forest management allocation and applied it to a variety of landscapes throughout the DEIS. We support the conditions for Backcountry Areas as described in **2.4.46 Backcountry Areas (BCA)**.

There are three areas in particular that are important to IMBA for this BCA allocation and where it is essential that access to high-quality mountain biking opportunities be preserved. It is important that these areas maintain an ROS setting of Semi-Primitive Non-Motorized (year-round). The areas are the Lionhead, Porcupine-Buffalo Horn, and West Pine. We advocate that these areas be established as BCA.

We support the non-motorized BCA allocation for the Lionhead as presented in Alternative E. The Lionhead (also commonly referred to as the Henry’s Lake Mtns.) is of the highest value to mountain bikers in the area. Our members have put in countless hours maintaining the trails (Sheep Creek, Mile Creek, Targhee Creek, Watkins Creek and sections of the CDNST) in this landscapes for all visitors and have not had conflicts, impacts or damage from our use raised or reported. This volunteer stewardship is in partnership with members of the equestrian community and the projects have received National Forest System Trails Stewardship matching grants as investments into the system for all users to enjoy. To maintain the existing characteristics of the area we do not desire to have new trail development expanded beyond the existing footprint. **We simply want to keep the Lionhead area as it is in a bike-friendly manner.** This non-motorized Backcountry Area designation will protect the non-motorized, wild experience and wildlife habitat values that the DEIS identifies as present in the Lionhead while continuing to allow mountain bike use where it is currently established in this invaluable area.

The other two areas (the Porcupine-Buffalo Horn, and the northeast portion of the WSA (West Pine) are encompassed by the GFP Agreement and are captured as backcountry allocation areas in Alternative C. **IMBA supports these two non-motorized backcountry areas in Alt C and the Lionhead BCA in Alt E. and we urge the CGNF to incorporate these thoughtful allocations into the final plan.**

While we appreciate that in Alternative C the CGNF has mostly drawn out the Lionhead trails from the RWA designation via the use of corridors, we do not prefer this approach. First, the DEIS and accompanying documents are inconsistent and its not clear from our read of the

various documents, tables, and maps in the DEIS how this would be achieved as there are numerous confusing discrepancies on whether and which trails would remain open to bikes in Alt. C. Statements in Appendix D table 62 suggest that only Sheep Creek and Coffin Creek are left open and later in that same table 62, the document claims that only 1.5 miles are left open to bikes in Alt C. while other sections claim that nearly all the trails would remain open. This gives us great pause and confusion. Much of the appendices also omits Alt E entirely but where E is discussed at least its consistent. We are unsure if and what the CGNF really has in mind and ask that this be further clarified, corrected, and consistent as soon as possible. We hope these are just mistakes in a large process and document but we have no way of telling.

Nevertheless, IMBA does not prioritize the method of using corridors in RWAs and we urge the CGNF not to adopt this approach for the Lionhead. The legal existence of bike trails in a landscape should be acknowledged and alternative designations chosen when special protections are sought. **Therefore, we prefer the redesignation of the Lionhead area as a BCA as provided for in Alt. E.** We believe this will create more continuity in management objectives which will both simplify the management actions needed over the course of the plan's life cycle as well as avoid unnecessary conflict through potentially competing objectives and public confusion as to which objectives have priority over the other. Table 62 in Appendix D also makes it clear that bikes have not and therefore do not damage Wilderness character of the Lionhead. Despite decades of bike access to the area, all the qualities (solitude, unconfined recreation, intact habitat, natural vegetative and ecological processes) continue to exist as is described in the document and demonstrated below.

While acknowledging that trails are currently open to bikes, the CGNF lists these qualities for the Lionhead under the "*Description of the wilderness characteristics*" in Appx D- Table 62.

Natural Quality – *The majority of this area is very natural appearing and the current vegetation is primarily affected by natural ecological processes. Most of this area has intact ecological integrity and generally appears to reflect ecological conditions that would be associated with the area without human intervention.*

Unconfined and/or primitive recreation – *This area offers unconfined and primitive recreation opportunities.*

Solitude – *There is opportunity for solitude as the sights and sounds of human activities and improvements are screened by topography or do not have impact due to distance.*

The USFS in Region 1 (and this includes the CGNF) often claims that mountain bikes degrade wilderness character and that bikes cannot coexist with "primitive" ROS. This claim is used to justify eliminating bikes from RWAs (existing and new) and many in the public like to echo these sentiments leading to misinformation on a grand scale as this is repeated across the country stemming from R1. Yet, here it becomes very clear that this is not the case. The CGNF finds no negative impact to character from bikes. In fact, due to the hundreds of hours of volunteer stewardship invested by mountain biking community on the Lionhead trails, one can assume that allowing bikes has actually helped to maintain and even improve the character. **This is not insignificant. The CGNF is proving that RWA landscapes that have long allowed bikes**

still contain all the wilderness character values that led to their RWA allocation in 1987 plan. This demonstrates that bikes should not be eliminated from RWAs so long as they are managed along with all other allowed uses. IMBA advocates this approach as we have lost hundreds of miles of trails simply because the opposite has been assumed. However, since the USFS in R1 continues to automatically evict bikes from RWA during planning under this false premise, we must either advocate for the redesignation of RWAs to more bike friendly and assured designations and/or against any new RWAs that contains cherished bike trails.

Future Partnerships

In Episode 5 of the CGNF Podcasts, the Forest Service states that the USFS will not be able to provide all the management in the future and will look to forest partnerships to help maintain trails and other assets. These are partnerships that the MTB community can provide in maintenance and repairs, reroutes and improvements. It is something we have been doing across MT and the country for decades. Every year mountain bikers volunteer over 700,000 hours of stewardship on public land trails. It's an ethic our organization was founded upon. However, were trails are closed to bikes, we will not be able to provide this valued stewardship.

In MT over the last decade, mountain bikers have documented well over 500 miles of trail closures as the result of planning due almost entirely to new or existing RWAs and WSAs. This is an unacceptable trend and one that flies in the face of the Chief's priorities of improving access, enhancing recreational opportunities and encouraging and facilitating volunteerism. We encourage the CGNF to reconsider its actions and proposals in light of these goals that should be applied on the CGNF. Yet, despite this, across the DEIS Alternatives are proposals where this trend is perpetuated. Yet again, this involves the closure of trails to bikes in all RWAs. We discuss this more in the section below but we want to highlight it here as it is undoubtedly connected to the quality and availability of future partnerships with the mountain biking community. By far the two most prevalent trail steward communities are the equestrian and mountain biking communities. The age of the equestrian community is increasing because the new participation in the activity is declining rapidly. However, **the age and participation in the mountain biking community is expanding rapidly.** The high school cycling leagues are growing exponentially and the stewardship ethic is prominent. **Therefore, for all intents and purposes, the future of trail stewardship lies with the mountain biking community.** The CGNF must not continue the eviction of bikes from critical backcountry landscapes if for not other reason then to ensure there are stewards to care and support the backcountry trail systems. The USFS have been excellent national and local partners with mountain bikers historically and we hope to continue this relationship into the distant future. While MTBers are committed to this partnership, the USFS in R1 is unnecessarily yet systematically eliminating the trails where we can apply this assistance. Let's change this.

Recommended Wilderness Area Management Allocations.

A number of the alternatives in this CGNF DEIS and particularly Alt D propose allocating vast new areas as recommended wilderness areas (RWA). In a number of these there are legally open mountain biking trails. In Alt D alone, according to the DEIS *table 2 Forest wide comparison of issues by alternative*², the RWA allocations in this alternative would close 256 miles of trails plus another 172 miles of multi use trail. That is more than 400 miles of lost access in just one alternative. This is outrageous and unacceptable! Alternative D would leave only 4% of the forest in SPNM setting and available for biking. We understand that the Forest strives and is legally required to provide a range of alternatives but this is an extreme step that unnecessarily pits two segments of the public at extreme odds when this extreme measure should not even be considered viable enough to put in a plan alternative. Alternative C, while far less impactful still results in 24 miles total of unnecessary trail closures to bikes. We believe strongly that the CGNF is failing to follow all the steps laid out in the FS Manual and Handbook where it is clear that before elimination of a use is warranted, other adaptive management steps and efforts should be taken to alter any undesired impacts of a use in RWA. As was described above, this very DEIS demonstrates that there has been no impact to character by bikes access to RWAs. **Therefore we implore the CGNF to end the automatic eviction of bikes from RWAs.**

Transitory or ephemeral non-motorized uses such as bike access should be permitted to occur in RWAs so long as they do not cause permanent impairment of Wilderness character. It is important that the CGNF utilize all of its “management” options to the fullest extent possible and in order of least restrictive first, opting for the most restrictive only after all other options have been exhausted. While the USFS has long cited its broad discretion in employing a wide range of management options, it's fair to say that any action chosen should be backed by proper analysis and justification and coupled with an exhaustion of less restrictive adaptive management actions prior to more restrictive actions. There is no supporting documentation in the DEIS that demonstrates that mountain biking has, is, or will degrade the character of these landscapes if managed. In fact, the tables in the appendices prove the opposite as documented above.

IMBA recommends that the CGNF should follow the orderly sequence of strategies and guidelines as set out in the Forest Service Handbook. (See FSH 1909.12, Chapter 74.1). In particular, the management strategy applied for Recommended Wilderness Areas (RWAs) here can be less restrictive, while achieving its goals as we have seen demonstrated by your own review of existing character in the landscapes throughout this document. More importantly, Congress agrees as we will provide below.

There are several management strategies described in the Forest Service Handbook (FSH), many of which do not require prohibiting mechanized travel, particularly where it has been

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd613797.pdf Table 2. Forestwide comparison of issues by alternative

allowed historically. To be certain, mountain biking has been allowed and practiced historically in areas designated as Recommended Wilderness in this Forest.

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.*

The DEIS, however skips straight to option #4 in any future RWA across all alternatives as it pertains to bike access, while other less restrictive steps are viable options. This lacks the true meaning of “range” in the range of alternatives. Automatically banning bikes from all RWA lands is too drastic, and not at all necessary. Mountain bikers value our current access to these lands. We often support new RWAs as we do here and is demonstrated by our support for the OA Vision but we can’t support RWAs where and when they automatically close the area to bikes.

We urge the Forest Service to use their adaptive management tools to continue existing uses as a first step. Mountain biking does not degrade the wilderness character of the landscape and the CGNF has shown that in the documentation. 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.

In addition, the handbook frames the above management steps as such:

*“All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. In addition, **the plan may include one or more plan components for a recommended wilderness area...**”* [emphasis added]

Multiple components may be utilized in an area, while still preserving the social and ecological characteristics that form the basis for a wilderness recommendation. The word “social” as it relates to the properties of wild lands is meant to cover the viewshed, health of the community and cultural sites not whether some are offended by another’s presence. See 36 CFR 219.19, Definitions,³ ““Social sustainability refers to the capability of society to support the network of relationships, traditions, culture, and activities that connect people to the land and to one another, and support vibrant communities.” This means that we as a society must aspire to be capable of supporting a network, in other words, a group or system of interconnected people or

³ <https://www.law.cornell.edu/cfr/text/36/219.19>

things, that relate to diverse relationships in the presence of multiple activities that connect us all to the land. Nowhere does this suggest that bicycling is contrary to the social characteristics of wilderness appropriate land. In the most basic interpretation of this, Social sustainability is achieved by learning to get along. The argument that bikes permanently degrade the social character of potential wilderness is a pretextual construct of users who wish to eliminate bicycle use because of their own dislike of the activity. A particular group's dislike of an activity is not a valid basis for exclusion. These are public lands not hiking lands...sharing is a necessary and essential prerequisite of recreating on lands such as RWAs. If you are not good at sharing, then maybe seek out private lands. It is well settled that a use that eventually may not conform to Congressional Wilderness designation, may be included in a plan for a Recommended Wilderness Area.

As such, IMBA encourages the CGNF to look to other forests in how they have managed future RWAs in a bike-friendly manner while ensuring they maintain the wilderness character.

1. Medicine Bow-Routt NF, WY

Under its 2003 Revised Forest Plan, this forest allows mountain bike access to the Rock Creek RWA.⁴ In response to comments, the forest allowed bike access, so “long as that use does not change the physical character of the area that makes it suitable for wilderness designation.”⁵ The forest recognized that “The Rock Creek trail provides one of the only long distance mountain biking opportunities” in the area.⁶

2. Colville NF, WA

This forest is currently finalizing an updated forest plan. Under the new plan, mountain bikes are allowed on existing trails in RWAs “as long as their use does not compromise wilderness eligibility.”⁷ In order to track wilderness eligibility, the forest instituted a monitoring program.⁸ The forest plans to annually monitor all reports of user-created trails, as well as 20% of the miles of trail open to mountain bikes.⁹ If user-created trails, mountain biking on closed trails, or off-trail mountain biking becomes an issue, the forest indicated it would close the RWAs to mountain biking.¹⁰ Importantly, the CNF properly defines eligibility as a physical feature since any social aspects of bike use would not continue under a Wilderness designation.

Mountain bikers have lost bike access to hundreds of miles of trails in Southwest Montana already. Continuing to expand the Recommended Wilderness Area footprint where mountain biking assets are or have legally ridden in the past is out of step with the Chief's priorities and

⁴ ROD, p. 42 (2003), https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5163262.pdf

⁵ *Id.*

⁶ Forest Plan, 3-90 (2003), https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5163443.pdf

⁷ Forest Plan, p. 150 (Sept. 2018) https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd594831.pdf.

⁸ *Id.* (“Recreational mountain bike use and the use of chainsaws for trail maintenance on existing National Forest System Trails are the only uses inconsistent with wilderness designation allowed in recommended wilderness. If monitoring suggests an increase of user-created mountain bike trails, mountain bike use will be curtailed in recommended wilderness.”).

⁹ *Id.* at 168.

¹⁰ *Id.* at 150.

the goals of the USFS. It is our understanding that the W.O of the USFS has provided informal guidance to the R.O.s that they should avoid creating RWAs in areas with existing mountain biking trails. Whether this guidance is written or verbal is unknown but it has been stated to IMBA staff in the WO of the USFS in D.C. at the Chief's office by agency leadership that lead the management of Wilderness, WSA and RWA lands. We agree with this sentiment and reiterate the importance of not closing off access to bikes by creating or renewing RWAs where bike trails exist as is proposed in both Alternative C and D.

Lastly, as mentioned above, Congress agrees. Both the House and Senate Appropriations Committees have passed appropriations reports for FY 2019 that have addressed the issues raised above.

HOUSE OF REPRESENTATIVES- DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS BILL -Explanatory Report, 2019 [P.69]¹¹

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.* [emphasis added]

SENATE-DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS BILL- Explanatory Report, 2019 [P. 83]¹²

*“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*

¹¹ <https://docs.house.gov/meetings/AP/AP00/20180606/108402/HRPT-115-HR.pdf>

¹²

<https://www.appropriations.senate.gov/imo/media/doc/FY2019%20Interior%20Environment%20Appropriations%20Act,%20Report%20115-276.pdf>

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.” [emphasis added]

Is the guidance the intent of Congress to have bikes managed in RWAs? Yes. What gives this language standing is the following statement on Page 706 of the Conference Report that accompanied the bill that passed in a bipartisan manner in the 115th Congress:

“The joint explanatory statement accompanying this Act is approved and indicates congressional intent. Report language contained in House Report 115–765 and Senate Report 115–276 providing specific guidance to agencies regarding the administration of appropriated fundsand any corresponding reporting requirements carries the same emphasis as the language included in this explanatory statement and should be complied with unless specifically addressed to the contrary herein. [emphasis added]

IMBA expects the CGNF to make a more thorough attempt to preserve bike trail access in areas on the forest and avoid allocating new RWAs overtop bike trail assets. However, were existing RWA has closed or threatens to close trails, we encourage the CGNF to take an approach similar to the example forests above, along with utilizing the full set of tools provided in the FSH in order to retain bike access or restore it where it has been lost.

Inventoried Roadless Areas (IRAs)

IRAs provide our members an important experience and setting and we stand up for the protection and access we have to them. According to USFS documents, the values of IRAs are explained as follows.

“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.”¹³

¹³ F.S. Roadless Area Conservation FEIS, at 3-238 (Nov. 2000)

As the CGNF DEIS states, there is approximately 847,420 acres of inventoried roadless areas on the Custer Gallatin National Forest. And due to the 2001 Roadless Rule, the boundaries of these areas are not to be removed or changed in the Forest Plan Revision. The intent of the Roadless Rule is to provide lasting protection for the IRAs and specifically, *“the Roadless Rule prohibits activities that have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics”*¹⁴ of these Inventoried Roadless Areas (IRA). So while other recommended allocations such as Recommended Wilderness, may overlay an IRA, these IRAs are already federally protected from the activities deemed to have a lasting negative impact by regulations under USDA 36 CFR. Bikes, as we know have always been considered appropriate uses of IRAs and we of course appreciate, value, and support that.

Interestingly, each of the DEIS Alternatives beyond the No Action Alt. and with the exception of the late addition of Alt E., propose a significant increase of new RWAs ranging from about 114,000 acres to over 700,000 acres of RWA. It is assumed that every one of these RWA acres is overlaid upon an existing IRA otherwise it would not likely qualify. While we understand the difference between an IRA and a RWA, the fact of the matter is that an IRA is part of the USDA Regulations under 36 CFR part 294-special areas and thoroughly protected, whereas a RWA is simply an administrative “Forest Plan Allocations”.¹⁵ An IRA therefore has more legally binding protections than and RWA.

IMBA is often supportive of new and existing RWAs where there are no bike assets as is the case for some areas on the CGNF per the recommendations in the OA Vision that we support. But we simply do not accept the reasoning behind overlaying RWA on top of IRAs particularly when the result closes off existing sustainable and non impactful activities such as mountain biking. Especially, when mountain biking has not been considered an activity with the “likelihood of altering or fragmenting landscapes” or resulting in a long-term loss of characteristics or IRAs. So the need to evict bikes as justification to further protect and area with a more legally vulnerable administrative allocation does not hold up. The IRAs are more legally well protected than the RWA. It therefore becomes clear that, for protections sake, it is not necessary to overlay an bike friendly IRA with an RWA unless there is an agenda behind the effort to remove bikes to ease the political process of future wilderness designation. **We caution the CGNF against getting persuaded into this false premise too often presented as fact by those who have a clear agenda and bias against bikes. IMBAs members stand by to defend IRAs from threats but we will not stand by as RWAs threaten bike closures.**

The CGNF has a suite of management tools, laws, and regulations available for use in adequately managing IRAs. We urge the Forest to fully explore and utilize these tools before

¹⁴ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd611703.pdf

¹⁵ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd617148.pdf

taking management actions such as RWAs found throughout Alt A,B,C,D that eliminate mountain biking access.

Recreation and ROS

Comment 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. Bikes have coexisted in primitive setting in various places on the Forest including the Lionhead area and the two should not be considered mutually exclusive.

Recreation Emphasis Areas

We support the concept behind the Recreation Emphasis Area allocation as a management tool to manage and provide recreation that is accessible to a wide range of visitors with good proximity to large populations centers. Several of these recreation emphasis areas include recreation resources that are very important to our members who recreate in a variety of ways but not all of the following are bike areas. We are supportive of all 12 Recreation Emphasis Areas listed in Alternative E of the DEIS.

- Main Fork Rock Creek (AB)
- Cooke City (AB)
- Main Boulder River (AB)
- Yellowstone River Corridor (AB)
- Hyalite (Madison, Gallatin, Henrys Lake Mountains)
- Gallatin Canyon (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Winter (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Lakeshore (Madison, Gallatin, Henrys Lake Mountains)
- West Fork Rock Creek/Red Lodge Mountain Ski Area (AB)
- M area (Bridger, Bangtail, Crazy Mountains)
- Bridger Bowl Ski Area – we propose modifying to Bridger Bowl Ski Area/Northern Bridgers (Bridger, Bangtail, Crazy Mountains) and expanding this area north to the Fairy Lake basin.
- Storm Castle (Madison, Gallatin, Henrys Lake Mountains)

Designating Recreation Emphasis Areas is a way for the forest plan to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction and attention to ensure that recreation within these areas is sustainable – both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. To this end, each Recreation Emphasis Area designation should be accompanied by specific plan components that are unique to each area that will guide sustainable recreation management.

Bike Access to the Continental Divide National Scenic Trail (CDNST)

IMBA members greatly value and appreciate our bike access to about 6 miles of the CDT within the CGNF. Specifically, the following segments in the Hebgen Lake RD: Lionhead Mountain Continental Divide National Scenic Trail 115, Mile Creek 214, and Mile Creek Face 219. **We support the aspect of the DEIS with regards to the CDNST where mountain biking would continue to be allowed on the trail in alternatives B, C and E. We oppose Alt D where mountain biking would no longer be considered a suitable use on the trail.** Again, while the CDNST is managed primarily for foot and horse, mountain biking has been addressed as an appropriate use on the NSTs¹⁶.

In the recent “CDNST Management Tool: Managing Recreational Uses” guidance issues April 2019, the USFS provides tools for forests to create unit plans for the CDNST in their forest. In this guidance document, the FS outlines various considerations when assessing the authorization of various special uses of the CDNST. Under one consideration is “benefits”. The question posed is, *“What benefits might the proposed use or activity provide to the CDT, trail users, and local communities? Would the proposed use or activity complement current and foreseeable future interests and needs?”*¹⁷ This is an interesting consideration as it presents more of a pro/con ratio scenario. Where if the benefits outweigh the negatives (which are considered and mitigating in other points of the guidance) then presumably you might allow an activity for those tangible benefits. Mountain bikers, and specifically our local chapter SWMMBA, as addressed earlier in these comments, have long dedicated hundreds of hours raising money and mobilizing volunteers to benefit the trails across the CGNF and specifically segments of the CDNST. In fact, the Continental Divide Trails Coalition (CDTC) lists not one but four MT-based mountain bike organizations as trail adopters for CDT segments in their areas. One of those is SWMMBA for the sections of trail in the Lionhead.

(Ironically and unfortunately, the CDTC group just also submitted comments to the CGNF DEIS seeking to remove bikes from the very segments of the CDNST that they officially recognize SWMMBA for maintaining. The phrase “have your cake and eat it too” comes to mind).

The MT mountain bike organizations that have maintained and looked after bike friendly segments of CDNST should be rewarded for this investment, not penalized or disregarded per the request of the CDTC or as presented in Alt. D. There are tangible benefits to the CDNST in having MTB groups riding and maintaining it. We are good stewards of the land and trails, clearing deadfall, fixing signage and drainage. IMBA and the USFS have been excellent national partners and local partners for our affiliates across the NF System and we hope to continue this relationship into the distant future. 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

¹⁶ 16 U.S.C. 1246(j):

¹⁷ Continental Divide National Scenic Trail Management Tool: Managing Recreational Uses April 5, 2019, Table 1: Authorizing Special Uses on the CDT: Considerations to Assist with Environmental Analysis and Decision-Making

CDTNST and Lionhead Backcountry Area. **We therefore support the CGNF in its efforts to retain the bike access to the CDNST.**

Bike trail access and development at Ski Areas

We support the desired conditions and guidelines regarding mountain biking and ski resorts. These areas already have noticeable and concentrated human impacts and are appropriate for higher levels of trail development and demand the intense management possible at ski areas. The ROS maps support this. We understand that our local group, SWMMBA, is in contact with Bridger Bowl to discuss how future development might look on private and public land in that area. We encourage these discussions and the meeting of these desired conditions.

DEIS 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.

Emerging Recreational Technology

The Draft Plan attempts to address this issue by saying this.

“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.”¹⁸

The USFS is notorious for being behind when addressing emerging technologies. Seeking to address it is a good idea to consider in the Forest Plan and we commend the CGNF for doing so. However, we think that generally most new technologies can, at least initially, be categorized in an existing framework or type of use. Therefore, we join others in recommending additional language be added to this statement.

*“....other new uses may be unspoken to by current direction [**ADD:** , while others may fit within or between existing definitions and be manageable under current direction or with minimal adaptations.]*

This may help simplify and speed the process of responding to new uses and technologies. It is best to be specific but adding the text we suggest may help the Agency act quicker and avoid having to address minor changes in technology which could fall into an existing category. The important thing is to address new technology and figure out where and if it fits in the Forest use spectrum.

Likewise, there is a spectrum of recreational uses already defined when it comes to modes of travel, however, that spectrum has evolved and been expanded to its current state over the course of decades. Each time new uses and technologies were the driving force behind the expansion. Most often, these new uses fit within or were closely related to an existing use.

¹⁸ DP Reference: Page 109: 2.4.33 Emerging Recreational Technologies (RECTECH)

They were placed into the spectrum in the appropriate place along the spectrum but remained separate from their most closely related cousins, so-to-speak. The unique traits and management demands of the new use dictated where it fell within the spectrum and how it was and is managed. We will continually face an ever expanding spectrum as technology, dictated by public interest, further refines and defines the ways people access the Forest.

What is most important here within the continual expansion of the spectrum, is ensuring separation of uses along the spectrum when new introduced technologies are uniquely different, rather than just combining with existing uses. A new use with a uniquely different set of traits demands a unique management protocol. New uses should not become synonymous with an existing use unless it predominantly fits within a current category and does not have traits that would be categorically different. The reason for this is that while uses may share close proximity on the spectrum, they should remain capable of being managed independently, to not only meet their unique demands but also as needed to avoid collateral damage to access on other uses should management actions or restrictions become necessary for one specific use. This sounds more complicated than it is. **Simplified, we urge the FS to assess new uses, identify their unique traits and management needs, place them individually and separately into the spectrum of uses based on dominant traits, and manage them accordingly.** Combining unique uses can and will likely have a detrimental impact on the end user.

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 it is appropriate to prohibit cross country travel as it 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 parcels.

Conclusion

Thank you to the Forest Planning Team for your time and attention to these important matters. While sometimes critical, we offer these comments in the spirit of constructive feedback and recommendations. IMBA remains available to the Forest Planning team to clarify or further discuss any aspect of these comments. We recognize that our requests are tied to our mission and that all recreation has impacts and that not all recreation can occur in all places. But we also remind the Forest that mountain biking is considered an appropriate activity on USFS lands and the science indicates time and time again that our impacts are on par with impacts from hiking. Your own site specific analysis supports this. Horseback riding has substantial impacts to tread and erosion. Motorized recreation has significantly higher impacts on resource conditions and has the highest social and wildlife impacts. Your management actions should follow a similar trend and acknowledgement and we look forward to seeing the best available site specific science applied to management decisions for access.

Thank you,

A handwritten signature in blue ink, appearing to read 'A. Clark', with a long horizontal flourish extending to the right.

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Appendix A- **OUTDOOR ALLIANCE VISION**

Outdoor Alliance Montana is a coalition of national and Montana-based advocacy organizations that includes Southwest Montana Climbers Coalition, Montana Backcountry Alliance, Southwest Montana Mountain Bike Association, Western Montana Climbers Coalition, Mountain Bike Missoula, Winter Wildlands Alliance, International Mountain Bicycling Association, American Whitewater, and the American Alpine Club (Montana Section). Our members visit the Custer Gallatin National Forest (CGNF) to hike, mountain bike, fat-tire bike, paddle, climb, backcountry ski, cross-country ski, and snowshoe. Access to, and preservation of, these recreational activities is very important to our membership. In addition, an important aspect of the recreational experience on the Gallatin – what makes this forest truly unique – is sharing this landscape with a full suite of native species. Sustainably managing recreation in balance with conserving wildlife and undeveloped landscapes on the Custer Gallatin is at the core of our vision for the future of this forest.

This document outlines our broad vision for the forest – specifically focusing on special designations and other “map-based” ideas.

I. Gallatin Forest Partnership Agreement

Several Outdoor Alliance Montana member organizations are members of the Gallatin Forest Partnership, and OAMT supports the Gallatin Forest Partnership Agreement. We ask that the Forest Planning team consider the Gallatin Forest Partnership recommendations as part of the preferred alternative in the development of its Draft Environmental Impact Statement.

The Gallatin Forest Partnership (GFP) Agreement protects habitat connectivity and quality and balances a wide diversity of recreation uses across the Gallatin and Madison ranges. The agreement recommends more than 124,000 acres of land for wilderness, as well as two Wildlife Management Areas, West Pine and Porcupine Buffalo Horn, where existing recreation uses would continue per the 2006 travel plan, but where wildlife management would take priority. In addition, we recommend expanding mountain bike opportunities in the West Pine area. The agreement also seeks to protect Bozeman’s water supply by designating the Hyalite and Bozeman Creek watersheds as the Hyalite Watershed Protection Area. We believe this designation and the management we describe in the GFP Agreement will give the Forest Service flexibility and options for protecting this important watershed while recognizing and managing the high level of recreation use the area receives.

The GFP Agreement represents the first agreement diverse stakeholders have ever reached around how to manage the Hyalite Porcupine Buffalo Horn Wilderness Study Area and provides

recommendations for the larger Gallatin and Madison ranges as well. We hope that the Forest Service will incorporate our recommendations into the forest plan.

II. Designated and Recommended Wilderness

Designated Wilderness is an important recreational resource on the Custer Gallatin. Hikers, trail runners, backpackers, backcountry skiers, cross-country skiers, snowshoers, paddlers, climbers, and more all recreate within and highly value designated Wilderness areas. The unconfined, primitive, recreation experience that Wilderness provides is highly desirable to human-powered recreationists. In addition to the proposed Wilderness included in the Gallatin Partnership Agreement (Cowboy Heaven, Taylor Hilgard, and the Gallatin Crest, including the Sawtooth portion of the Gallatin Range), we support recommending Wilderness for the following additional areas:

- Line Creek Plateau (AB)
- Red Lodge Creek- Hell Roaring (AB)
- Mystic Lake (AB)
- Republic Mountain (AB)
- Chico-Emigrant (AB)¹⁹
- Lost Water Canyon (Pryors)

With the exception of Lost Water Canyon, these areas are particularly important for backcountry skiers and winter mountaineers. Lost Water Canyon is highly valued by hikers and includes exceptional cultural values.

III. Backcountry Areas

There are some areas of the Custer Gallatin that are valued for human powered recreation and which require more flexible management than under recommended Wilderness in order to maintain recreational opportunities. There are three areas in particular (two of which are encompassed by the GFP Agreement) where it is essential that access to high-quality mountain biking opportunities be preserved: the Lionhead, Porcupine-Buffalo Horn, and the northeast portion of the WSA (West Pine). We strongly support a non-motorized Backcountry Area designation for these areas.

We ask that the Forest Service designate these areas as non-motorized Backcountry Areas, with a Recreation Opportunity Spectrum setting of Semi-Primitive Non-Motorized (year-round). Lionhead, in particular, has remote, natural, difficult terrain that is valued by hikers, mountain bikers, and backcountry skiers. To maintain the existing characteristics of the area we do not want to see trail development expanded beyond the existing footprint. For this reason, the Forest Supervisor should issue a special order within one year of Forest Plan completion stating that within the Lionhead, no new trails should be constructed. This non-motorized Backcountry Area designation will protect the non-motorized, wild experience and wildlife habitat values in

¹⁹ We propose a Chico-Emigrant RWA boundary as mapped in Attachment A

the Lionhead while continuing to allow mountain bike use where it is currently established in this invaluable area.

The Gallatin Forest Partnership Agreement includes recommendations for managing the West Pine and Porcupine-Buffalo Horn Backcountry Areas, and we are supportive of these recommendations. There may be other Backcountry Area designations that the Custer Gallatin deems appropriate elsewhere on the forest, such as in the Pryors or on the Ashland district. We are less familiar with these areas and defer to those with expertise on these areas of the forest.

IV. Wild and Scenic Rivers

In addition to the 31 streams found to be Wild and Scenic eligible in the Proposed Action, which we strongly support, we advocate that the Forest add the following six streams to its eligibility inventory. They are all free-flowing, possess at least one ORVs, and are conservation priorities for the paddling community:

- Bear Creek, Absaroka Mountains
- Buffalo Creek, Absaroka Mountains
- Hellroaring Creek, Absaroka Mountains
- Porcupine Creek, Gallatin Range
- Hyalite Creek, Gallatin Range
- South Fork Madison River, Hebgen Basin
- Taylor Fork River, Madison Mountains
- Sweetgrass Creek, Crazy Mountains

Hyalite and Sweetgrass Creeks are of particular importance to the whitewater paddling community. Hyalite Creek is Bozeman's backyard creek run, offering paddlers seasonal road-accessible Class IV creek boating which is a regional rarity. The Custer Gallatin recognizes the outstanding recreational values of the upper portions of Hyalite in the proposed action, and for paddlers these values are exemplified on the lower reach between the reservoir and the Forest Service boundary as well. We ask that the Forests consider a recreation ORV for this reach.

Sweetgrass Creek is the largest stream in the Crazy Mountains and possesses extraordinary scenic values. We recognize that Big Timber Creek is vastly more popular and also exemplary. We feel however that finding two streams eligible in the spectacular Crazies is more than justified, and we ask that the Forest Service give Sweetgrass additional consideration for eligibility based on a scenery ORV.

V. Recreation Emphasis Areas

We are very supportive of the Recreation Emphasis Area concept as a management tool and believe the Forest Service is on the right track in this regard based on what we've seen of the Conceptual Draft Alternatives released this past summer. We are supportive of all 12 Recreation Emphasis Areas listed in Conceptual Draft Alternative E.

- Main Fork Rock Creek (AB)
- Cooke City (AB)

- Main Boulder River (AB)
- Yellowstone River Corridor (AB)
- Hyalite (Madison, Gallatin, Henrys Lake Mountains)
- Gallatin Canyon (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Winter (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Lakeshore (Madison, Gallatin, Henrys Lake Mountains)
- West Fork Rock Creek/Red Lodge Mountain Ski Area (AB)
- M area (Bridger, Bangtail, Crazy Mountains)
- Bridger Bowl Ski Area – we propose modifying to *Bridger Bowl Ski Area/Northern Bridgers* (Bridger, Bangtail, Crazy Mountains) and expanding this area north to the Fairy Lake basin.
- Storm Castle (Madison, Gallatin, Henrys Lake Mountains)

Designating Recreation Emphasis Areas is a way for the forest plan to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable – both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. To this end, each Recreation Emphasis Area designation should be accompanied by specific plan components that are unique to each area that will guide sustainable recreation management.

Several of these recreation emphasis areas include recreation resources that are very important to our constituents. For example, Hyalite and Gallatin Canyon are home to some of the best climbing in Southwest Montana. Hyalite is world-renowned for its high concentration of naturally-occurring waterfall ice and climbers were instrumental in securing winter access to Hyalite Canyon. Gallatin Canyon is home to a high concentration of bolted and traditionally protected rock climbs of all grades. Cooke City, Red Lodge Mountain, and Bridger Bowl are all major destinations for winter recreationists. The Bridger Bowl Recreation Emphasis Area should be expanded north to Fairy Lake, as this entire area receives high levels recreation use. In addition, because of increased winter backcountry recreation and ongoing issues with enforcement of the current travel plan designations in the Northern Bridgers, the revised forest plan should include direction to the Forest Service to re-visit winter travel management in the Northern Bridgers. Finally, the West Fork of Rock Creek, Main Fork of Rock Creek, Boulder River Corridor, and Yellowstone River Corridor are all extremely important to paddlers. These 4 corridors provide everything from expert-level whitewater paddling to family canoe opportunities.

VI. Wildlife Management

To address the public's concerns about recreation impacts to wildlife, we propose that the Forest Service monitor wildlife populations across the forest and adapt recreation management as necessary to protect wildlife populations. Management strategies may include (but are not limited to) limiting use during periods where wildlife are vulnerable such as elk calving in the spring or wolverine denning mid-winter, restrictions on dispersed camping or other uses, and

permit systems in heavily visited areas. Any necessary management prescriptions or use limitations should be equitably applied across user groups.

VII. Conclusion

The communities surrounding the Custer Gallatin, particularly Bozeman, are among the fastest-growing in the nation and people are moving to this region in large part because of public lands and the outdoor recreation opportunities they provide. The Custer Gallatin currently provides phenomenal outdoor recreation opportunities in balance with a healthy ecosystem and thriving wildlife populations. Maintaining this balance into the future, under stressors ranging from climate change to human population growth, will be a challenge but is fully achievable with thoughtful and proactive planning. This is an opportune time to revise the forest plan and we look forward to continuing to be a full partner in this effort.

Appendix A- OUTDOOR ALLIANCE VISION

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