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Comments:

Re: Custer Gallatin National Forest Plan Revision - MTB Missoula Comments

Hello Forest Plan Revision Team,

Thank you for the opportunity to submit comments for your review regarding the Custer Gallatin National Forest. These comments are submitted on behalf of MTB Missoula, a conservation and recreation advocacy group based in Missoula, Montana. We focus our efforts on providing and conserving sustainable recreation opportunities across western Montana. On behalf of our Board of Directors and many hundreds of constituents in Missoula and beyond, I appreciate this opportunity to participate in the Custer Gallatin Forest Planning Process, specifically in regard to mountain bike access in the Gallatin Mountains and the Lionhead area near Henry's Lake.

The heart of MTB Missoula's mission is a firm commitment to conservation and stewardship of public land. Our role is to speak for and engage the mountain biking conservationist. Mountain bikers are motivated, civic-minded trail users who build connections with the public landscapes we love through quiet, human-powered recreation. MTBM volunteers also literally build connections by contributing thousands of hours per year through challenge cost share and sponsored volunteer agreements to maintain more than 100 miles of trail across western Montana. Working with our partners, including the Lolo National Forest, the City of Missoula, Five Valleys Land Trust, The Nature Conservancy, and others, we are expanding and improving open space, providing greater recreational options for bikers, hikers and runners.

Importantly, our trail development and maintenance efforts are focused on conservation and include removal of non-native vegetation and replanting with native plant species and erosion control to protect water resources. Further, our organization advocates for sufficient budgets and resources for land-management agencies so they can effectively and sustainably manage these landscapes, upon which western Montana's recreation economy is built. In these efforts, mountain bikers have a proven record of agency partnership, and MTBM looks forward to continuing to build trust and rapport with land managers.

As your agency compiles the outpouring of support for continued human-powered access to wild places, please consider MTB Missoula's following comments regarding forest planning on the Custer and Gallatin National Forests.

The Gallatin National Forest holds a special place in the hearts of countless numbers of people living in Montana and around the US. The Gallatin and Madison mountain ranges are some of the last remaining intact wild areas in the lower 48 states and are deserving of protection from activities that degrade its wild character, damage precious natural resources, and erode its beauty. Lying between Yellowstone National Park and the Lee Metcalf Wilderness, this corner of the Greater Yellowstone Ecosystem is one of the few places left in the lower 48 where nearly all of species that were here when Lewis and Clark made their journey west still exist today. Among the species the Gallatin Range supports are grizzly bears, moose, mountain goats, wolverines, and the occasional lynx. Portions of the Gallatins provide critical winter range for elk, bighorn sheep, and other big game. It's also an essential source of clean water for nearby towns, a recreational mecca for outfitters,

anglers, hikers, mountain bikers, climbers, and a place for the adventurous to find solitude. The wild nature and remoteness of the Gallatin mountains is exactly what so many mountain bikers come to the Gallatin National Forest to find - wild, remote, challenging riding experiences and a grand and unforgettable backcountry mountain biking experience!

Backcountry and alpine mountain biking is a slow, deliberate, intentional, and immersive experience averaging speeds of 3 to 5 mph. This style of riding that takes place in the Gallatin Mountains, the Lionhead area, and other remote backcountry environments. The trails sought out by backcountry mountain bikers and many bikepackers are rugged, undeveloped, remote, and difficult to ride. They require solid navigation skills, self sufficiency, and they often require sections of walking or carrying your bike; they also provide challenge, connection to place, opportunities for self sufficiency, solitude, and an undeveloped wild experience - essentially a wilderness experience on a bike. This type of experience is something that front country trails and areas criss-crossed with forest roads cannot provide.

MTB Missoula supports of the bulk of the Gallatin Forest Partnership Agreement. This broadly supported agreement was the result of hard work and compromise from a diverse group of stakeholders. We would also like to advocate for the use of alternative land designations such as Backcountry Area or Conservation Management Area as these designations allow for continued access to wild places on public land while also providing for the preservation of the wild, remote, and undeveloped character of these areas. These alternative management tools will maintain connections for long distance trail riding opportunities through wild and remote areas and across multiple landscapes for backcountry riding and for bikepacking. Long distance connectivity of trails is immensely important in allowing back country mountain bikers and bikepackers pass through areas rather than be stopped or detoured to a road or highway, turned around at a trail junction, mid trail, or state boundary line because of a Wilderness boundary. Where boundary adjustments or alternative designations are not possible, the use of corridors through Wilderness or Recommended Wilderness would accomplish this connectivity while also protecting the resource. The Gallatin Crest Trail #96 is an excellent example of where a corridor would be useful in providing egress through proposed Wilderness in the Gallatin mountains.

In addition to supporting the Gallatin Partnership Agreement, MTB Missoula would like to specifically encourage the Lionhead RWA be managed as a designated Backcountry Area to allow for existing and historical mountain bike access to the Continental Divide National Scenic Trail that runs along the Mile Creek and Targhee Pass trails. Using the Backcountry Area management tool as a companion designation would also provide for continued bike access to the Lionhead Trail, Sheep Creek and Coffin Creek areas - as outlined in Alternative E. The mountain biking community has worked diligently with other stakeholders such as the Gallatin Chapter of the Backcountry Horsemen to steward the Lionhead area and we have a vested interest in maintaining our access to this area. This action would maintain connectivity with areas of the Lionhead that are managed by Region 4 where mountain biking is allowed. The Continental Divide National Scenic Trail is open to mountain bikes unless prohibited by Wilderness or travel planning. The same goes for National Recreation Trails, such as the Bridger Foothills Trail and Garnet Mountain trail. Managing these trails to exclude bikes as described in alternative D is unacceptable.

Regarding Wilderness Study Areas and Recommended Wilderness Areas; until formal designation by congress, all RWA's and WSA's should continue to allow bicycle access where it has been established. The best available scientific research is clear regarding the negligible effects of mountain biking on a variety of physical environmental conditions of our wildlands. In addition, there is a body of research indicating that the presence of mountain bikers in wild and natural areas does not negatively impact others perceptions of mountain bikers or mountain bike access to a natural area. In fact, Cessford (1995, 2002) found significant similarities in values and attitudes of hikers and backcountry mountain bikers and that hikers who encountered bikers on trail had a more positive perception of mountain bikers than those hikers who didn't encounter bikers on trail.

The 2012 planning rule Chapter 70, section 74.1(2) states the forest managers may "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." Precedent in the Boulder-White Clouds indicates that the presence of mountain bikes on a landscape one day does not prevent Wilderness designation the next. In fact, mountain bike groups are on the record supporting large-scale Wilderness expansion - mountain bikers are not anti-Wilderness. MTB Missoula in particular and the mountain bike community in general are on the record enthusiastically supporting the following recent projects:

An 80,000 acre Wilderness expansion as a part of the Blackfoot-Clearwater Stewardship Project in western Montana

67,000 acres of new Wilderness designated by the Rocky Mountain Front Heritage Act on the Rocky Mountain Front in western Montana

37,400 acres of Wilderness included in the Hermosa Creek Watershed Act in Colorado

45,000 designation of the Columbine-Hondo Wilderness area in Colorado

In fact, two mountain bike organizations were active partners in the Gallatin Forest Partnership Agreement, an agreement that recommends over 100,000 acres of new wilderness to the Gallatin and Madison Mountain ranges. Mountain bikers have been champions for nearly every new Wilderness designation in recent years and the mountain bike community is eager to participate in the conversation and illustrate how broad coalitions and community stewardship improves the sustainability of recreation management.

On behalf of the MTB Missoula Board and members, I am eager to continue to participate in the important conversations around wilderness, recreation, and land management on the Custer Gallatin National Forest. Of course please never hesitate to reach out with any questions.