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First name: Terry

Last name: Jones

Organization: Beartooth Recreational Trails Association

Title: President

Official Representative/Member Indicator:

Address1: Box 1872

Address2:

City: Red lodge

State:

Province/Region: Montana

Zip/Postal Code: 59068

Country: United States

Email: terrillcjones@gmail.com

Phone: 4064260625

Comments:

Thank you for the opportunity to comment on The Custer Gallatin National Forest's Draft Revised Forest Plan. We are writing this letter on behalf of Beartooth Recreational Trails Association, Inc. (BRTA). BRTA is a volunteer 501(c)3 not for profit corporation that operates the Red Lodge Nordic Center and is involved in promoting and maintaining non-motorized trails in and around the Red Lodge area including the Custer Gallatin National Forest. Please consider BRTA's comments on the Custer Gallatin's Draft Forest Plan and Draft Environmental Impact Statement.

In relation to the Pryor Mountain and Absaroka Beartooth Geographic Areas we generally support Alternative C with some further comments:

1. Our organization is an advocate for hikers, backpackers, horseman and bicyclists. For this reason we support the proposed Big Pryor Mountain, Bear Canyon, Lost Water Canyon, Punch Bowl and Bad Canyon Backcountry Areas.
2. Recommended wilderness designation would preclude the use of wheeled non-motorized vehicles such as bicycles therefore we do not support wilderness for these areas.
3. It may be more probable that new non-motorized trails could be constructed in a designated backcountry area as opposed to a wilderness area. However, it is unclear if new trail construction or relocations/improvements of existing trails would be allowed in backcountry areas in the Draft Revised Forest Plan - please clarify this point.
4. It is unclear if mechanized use (bicycles) would be allowed in backcountry areas on existing trails and roads, it appears that bicycles would be allowed in the Bad Canyon Backcountry Area but not in the Pryor Mountain Backcountry Areas. The wording in the Draft Revised Forest Plan is not clear on this subject. From the Plan:

Pryor Mountains Geographic Area

Suitability (PR-SUIT-PBCA)

02 Alternative B: The backcountry areas are suitable for mechanized recreation use and for motorized recreation use on existing motorized routes.

Alternative C: The backcountry areas are not suitable for motorized and for mechanized recreation use.

Bad Canyon Geographic Area

Suitability (PR-SUIT-BCBCA)

01 Alternative B: The backcountry areas are not suitable for motorized and for mechanized recreation use.

Alternative C: The backcountry area is suitable for nonmotorized and for mechanized recreation use.

BRTA supports the use of bicycles in backcountry areas. We feel that the backcountry designation should be consistent across all backcountry areas to include mechanized recreation use (bicycles) on existing roads and trails the future development of some new trails for mountain biking within backcountry areas.

5. We support the designation of the Main Fork Rock Creek as a Recreation Emphasis Area under all alternatives. Due to the high recreational use, existing loop trails and potential for connecting trails to the community of Red Lodge, the West Fork Rock Creek Recreation Emphasis Area designation should at least be in Alternative C (it is currently only in alternative E).

6. BRTA currently holds a special use permit for grooming of a portion of the West Fork of Rock Creek Road. We ask that the Forest Plan specify that grooming on West Fork Rock Creek road and adjacent areas is a suitable use that should continue into the future and be expanded to improve opportunities and accommodate increased use. We support increased opportunities for grooming for non-motorized winter recreation (xc-skiing, snow bikes & snowshoers) by cooperators. The Forest Plan should consider and prescribe locations or conditions under which additional grooming is suitable.

7. We support plowing of Forest Service roads and parking areas in order to provide public access to x-country ski trailheads and especially to those that are groomed. Areas near Red Lodge that are examples of this need are West Fork Rock Creek, Silver Run and Lake Fork. The cost of plowing could be accomplished with cooperator assistance.

8. BRTA operates the Red Lodge Nordic Center, which is on private lands near the CGNF that are leased on an annual basis. This is a volunteer-run Nordic center that provides skate and classic ski opportunities at a very low cost to Red Lodge and adjacent communities, including the large population in Billings. BRTA currently has a great relationship with the landowner that we lease the property from. In the event that this leased land is no longer available or becomes prohibitively expensive, BRTA may need to move Red Lodge Nordic Center to a new location, such as a location on the CGNF near Red Lodge. The Forest Plan should consider potential groomed Nordic ski areas in formulation of Recreation Opportunity Spectrum zoning and related suitability determinations near the Red Lodge area.

9. Desired conditions and Standards for Recreation Settings Recreation Opportunity Spectrum (ROS) do not address whether glading of timbered areas is appropriate for non-motorized winter recreation, such as non-commercial backcountry skiing and snowboarding. There are some areas where vegetation management, such as pruning lower limbs of trees, removing downfall, and removing ladder fuels could improve recreation opportunities by increasing skiable acreage, directing use to or away from specific areas, and easing overcrowding. Such glading could also reduce fuel loads and improve forest health. Gladed areas are not trails and are not recreation facilities. Gladed areas are not motorized routes suitable for grooming. Similar to goals associated with winter grooming and plowing, the Forest Plan should specify that the Forest Service should seek partnerships for completion of glading and use of mechanized or motorized equipment to conduct such glading in non-wilderness areas. BRTA recommends that glading for non-motorized winter recreation purposes be specifically considered and included in defining the Custer Gallatin NF's ROS. The Forest Plan revision team should consider areas mapped by users as popular CGNF backcountry ski destinations for potential glading opportunities (see <https://www.powderproject.com/> or <http://about.mountainhub.com/>)

10. Recreation Opportunities-Ski Resorts (RECSKI) does not discuss or consider access to CGNF lands adjacent to ski area boundaries. With recent advances in touring gear, the allure of untracked powder and the prolific buzz about all things backcountry, more and more skiers and riders these days are crossing over from resorts to the out-of-bounds. Ski resorts across the country have a variety of boundary access policies, including those on the Custer Gallatin NF. BRTA recommends that the Forest Plan include a Desired Condition to allow for side-country access (i.e. backcountry skier access from within ski areas to areas outside ski areas). The Forest Plan revision team should consider areas mapped by users as popular CGNF side-country ski destinations and ensure continued and improved access (see <https://www.powderproject.com/> or <http://about.mountainhub.com/>)

11. With recent advances in touring gear, many recreation users desire opportunities for uphill travel at ski areas. Ski resorts across the country have a variety of uphill travel policies, including those on the Custer Gallatin NF. BRTA recommends that the Forest Plan include a Desired Condition to allow for uphill access opportunities at ski resorts, including uphill access during operating hours. Safety concerns can be mitigated via signage and use of specified routes.

12. The Gallatin Avalanche Center currently offers services focused on the former Gallatin NF. As population increases in the GYE and winter recreation increases to the east, the CGNF should consider

expanding these services to the east and should change the avalanche center's name to Custer Gallatin Avalanche Center. This need should be reflected in Desired Conditions (FW-DC-RECED)

Additionally, BRTA supports the Gallatin Forest Partnership Agreement because it is a well thought out and balanced approach by a diverse group of entities and people. We feel that the main points in the Agreement relative to how the Custer Gallatin National Forest should be managed be incorporated into the Revised Forest Plan.

Booming urban growth, advances in recreation technology, and climate change related impacts are putting more and more pressure on our public lands and are issues that need to be considered and included as part of the Forest Plan revision process. It is critical that the new management plan get ahead of these threats by ensuring that quality public lands recreation opportunities and experiences are provided, protecting wildlife populations, and implementing strategies to better understand and adapt to a changing climate.

We support the full incorporation of the Gallatin Forest Partnership (GFP) Agreement into the plan for the Gallatin and Madison ranges. However, while alternative C incorporates parts of that agreement, it does not accurately reflect the GFP's recommendations for wildlife protections or recreation monitoring. Looking outside the GFP agreement, it is also critical that we protect and enhance other areas, including wildlife linkage areas and existing wilderness, and include enforceable climate change components.

We are specifically commenting on the Absaroka Beartooth and Madison, Henrys Lake, and Gallatin geographic areas. These areas provide valuable wildlife habitat, headwater streams, and diverse recreational opportunities within the Greater Yellowstone Ecosystem. We recommend the following revisions to the Draft Plan:

1. Ensure wildlife connectivity in portions of the Madison, Henrys Lake, and Gallatin Geographic Areas that aren't otherwise protected by the grizzly bear recovery zone. The Madison, Henrys Lake, and Gallatin Geographic Areas are critical for wildlife movement to areas beyond the National Forest and not all wildlife strictly rely on the grizzly bear recovery zone.
2. Habitat protections for grizzly bears must extend wherever population health is monitored and into areas important for connectivity. As evidenced by recent de-listings and re-listings of grizzly bears and listing of whitebark pine as a sensitive species, reliance only on the Endangered Species Act to protect grizzly bear habitat is not adequate. Grizzlies must also be designated as a Species of Conservation Concern.
3. Plan components must support a year-round self-sustaining bison population within tolerance areas on National Forest System lands.
4. West Pine and Porcupine Buffalo Horn backcountry areas must mirror Cabin Creek Wildlife Management Area in wildlife protection and wild character plan components.
5. Recreational use must be monitored more extensively by area, and standards must ensure that increasing recreation is balanced with wildlife and other natural resource protection.
6. Manage existing wilderness areas in line with the 2020 Vision.
7. Given the uncertainties of climate change, monitoring questions for vegetation, invasive species, aquatic resources, fire, and more must explicitly assess the effects of climate change and guide adaptive management as required by the 2012 planning rule (219.12(a)(5)(vi)).
8. In addition to the 30 rivers recommended as eligible for Wild and Scenic designation, include Taylor Creek, Hellroaring Creek, and the South Fork of the Madison due to their outstanding wildlife values.

Thank you for your consideration.