

**URGENT!! COMMENT PERIOD ENDS MONDAY, MARCH 5<sup>TH</sup>, 5PM!!**



**MONTANA MOUNTAIN BICYCLE ALLIANCE  
RECOMMENDED COMMENTS ON  
CUSTER GALLATIN FOREST PLAN REVISION, Proposed Actions  
WINTER 2018**

The CGNF Forest Plan Revision's **Proposed Action** suggests important solutions in a smaller *Recommended Wilderness Area* (RWA) bordering Montana's major recreation communities. Respecting SWMMBA's (Southwest Montana Mountain Bicycling Association) attempted efforts with GNP (Gallatin Forest Partnership), these proposals miss significant administrative land management opportunities in backcountry areas of high-value.

Please use these **talking/bullet points** in this document, to form comments in your own words. In the second half of this document MMBA has noted pertinent information after each grouping of bullet points, titled "**Background**" as a prompt to further your research on recommendations for the Forest Plan Revisions.

## **BACKSTORY & MMBA RECOMMENDATIONS**

After 35+ years in the making, including 15 arduous years of regional and national mountain bicycle advocacy, the Comment Period for the Custer Gallatin N.F. Forest Plan Revision (CFNFFPR) is potentially the most pivotal in this era of cyclists to impact both agency administration and national Congress in determining future public land management strategies.

In the crosshairs of this Plan is how current backcountry bicycle trail access will be managed in the future on the trails in the Lionhead Recommended Wilderness Area (RWA). Situated in the Henry Mountains near West Yellowstone and the Idaho border, the Lionhead trails are within a backcountry landscape that have been long cherished and maintained by the collaborative efforts of public land managers with crews of bicyclists and backcountry equestrians. This section of the Continental Divide National Scenic Trail (CDNST) in Mile Creek has become the *poster child* with a touchstone question: *after twenty + years of bicycling in the Lionhead, including last season, why are quiet, non-motorized, muscle-*

*powered bicyclists proposed to be treated differently than hikers and equestrians?*

It is time for every back-country bicyclist and trail-lover to weigh-in and speak pointedly to how bicyclists are willing and responsible partners in keeping our public access sustainable AND wild. ***MMBA needs your communication and follow through skills in comments to the CGNF !***

The Forest Plan's Proposed Action continues to recommend an RWA for the Montana side of Lionhead. While the Proposed Action currently excludes the Mile Creek Trail / CDNST section from the RWA (a good thing), the rest of the Montana side of the Henry's would fall under the 'new' RWA management. And in Forest Service Region One, this means CLOSED TO BIKES - which would eliminate a sublime 35-mile backcountry loop that has been maintained by bicyclists and peacefully shared with the wild-mega fauna, and other recreational and agricultural users throughout its entire trail history.

The Forest Plan's Proposed Action has defined a new recreational land use term, an administrative companion designation for the Porcupine / Buffalo Horn area, proposed as the **Buffalo Horn Backcountry Area** in the Hyalite Porcupine Buffalo Horn WSA (HPBHWSA). With Forest Plan's proposed action, the public has a new tool to make recommendations for a solution that is applicable to the Lionhead area. ***Join the Southwest Montana Mountain Bike Association, the Wilderness Society and the Greater Yellowstone Coalition's support for protections proposed for wildlife habitat AND high-value recreational trail access offered in the proposed BHBA in the HPBHWSA, and MMBA's recommendation to create a Lionhead Backcountry Area for the same reasons.***



**Below are the MMBA talking points, Online Information Links if you want to learn more to customize your personal letter, and a simple online submission link. Thank you!**



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Please use these **talking/bullet points** in this document, to form comments in your own words. In the second half of this document MMBA has noted pertinent information after each grouping of bullet points, titled "**Background**" as a prompt to further your research on recommendations for the Forest Plan Revisions.

Montana Mountain Bicycle Alliance (MMBA) recommends the following to refine sustainable backcountry access for non-motorized bicycling:

**Proposed Action in Lionhead RWA to discontinue bicycle access**

**With the vision and long-term goal for a wild and manageable wildlife / recreation corridor from the Yellowstone National Park boundary in Idaho and connecting to the Lee Metcalf Wilderness Area in Montana, please let the Forest Planners know your recommendations by referring to these bullet points:**

- Support the Proposed Action's direction that keeps the Continental Divide National Scenic Trail in Mile Creek bicycle friendly but STRESS it does not go far enough to manage this wild area in a socially responsible manner. Bicyclists have long ridden,

maintained and cherished the backcountry loop option using Sheep Creek (#218) and West Fork of Watkins Creek (#216) in addition to the Mile Creek CDNST.

- Ask the CGNF Forest Planners to create a Lionhead Backcountry Area for the entire Lionhead RWA similar to the innovative Proposed Action they used for the Buffalo Horn Backcountry Area. This Backcountry Area designation would more accurately fit the present low-impact, quiet recreational use in the area and will local land managers the responsive discretion to pro-actively *manage* this landscape for issues involving wildlife, recreational use and trail sharing and impacts of climate change. A Lionhead Backcountry Area avoids the proposed RWA's blanket bicycle ban and allows land managers (and a Public NEPA process) to address the specifics of travel management for ALL trail users in the next Travel Management Plan. **This is our number one issue!**

### **Unsatisfactory Proposed Action in all existing and proposed RWAs to discontinue bicycle access**

- Ask Forest Planners to allow local land managers to continue using their discretion to manage all recreation use including current bicycle access in existing and proposed RWAs.

### **Good Proposed Actions (for bicycle access/continued access) in Big Creek, Swan Creek, Hyalite Creek (Paradise Valley side), Cherry Creek/ Cowboy Heaven, Hyalite Drainage (Gallatin Valley side), Mile Creek Trail, Buffalo Horn Areas**

Let the Forest Planners know your **approval of these bullet points below:**

- Support the CGNF Forest Plan's proposed action that proposes to **exclude Big Creek, Swan Creek and Hyalite Creek (Eastside/Paradise Valley)** from the proposed RWA.
- Support the CGNF Forest Plan's proposed action to continue bicycle access on the **#401 trail to Cherry Creek / Cowboy Heaven from the Spanish Creek Trailhead.**
- Support the CGNF Forest Plan's proposed action for the **Recreational Emphasis Area** for the Hyalite Drainage.
- Support the CGNF proposed action for the **Buffalo Horn Backcountry Area.**

### **Unsatisfactory Proposed Action for Recommended Wilderness Area at Rock Creek, Windy Pass, Cooper Bench and Big Creek Areas**

Let the Forest Planners know **your recommendations by referring to these bullet points below:**

- Ask the Forest Planners to manage *Rock Creek, Windy Pass, Cooper Bench and Big Creek* similarly to (the CGNF Forest Plan's preferred action for) the proposed **Buffalo Horn Backcountry Area** (see below for more info on this proposed action in the Buffalo Horn Area near Big Sky, Montana).
- Ask the Forest Planners to consider **removing Rock Creek and Windy Pass areas**, two popular, easily accessible recreation locations from the Gallatin Recommended Wilderness Area boundary.
- Ask the Forest Planners to adjust Recommended Wilderness Area (RWA) boundary to **exclude Cooper Bench**.

### **Unsatisfactory Proposed Action for bicycle access in HPBH WSA**

Non-motorized bicyclists have recreated responsibly in the Hyalite Porcupine Buffalo Horn WSA for many decades.

As trail builders/maintenance volunteers and natural resource stewards, we reiterate our commitment to our national heritage and respectfully **ask for the following innovations:**

- Request Forest Planners to remove Gallatin Crest Trail #96 from proposed RWA and manage the route as a **Backcountry Corridor** that could permit future bicycling.
- Consider restoring and/or continuing non-motorized bicycle allowance, with a **community-based advisory council to monitor and evaluate all trail usage and conditions as a Forest Plan outcome**.

### **Other Innovations to Mention and Support**

#### **Fat Bicycling, Emerging Recreational Technologies (RECTECH) and FW-GDL RECTECH 01, Recreation Opportunity Spectrum (ROS), Additions to the Guidelines**

- Support the CGNF Forest Plan's foresightful recognition of **Emerging Recreational Technologies (RECTECH)** to proactively evaluate and manage recreation use.
- Request **fat bicycling recognition:**
  1. in semi-primitive non-motorized settings (winter),
  2. in roaded natural \*ROS settings (winter) and,
  3. in rural \*ROS settings (winter)

#### **Recreation Opportunities-Ski Resorts (RECSKI)**

- Ask for an addition to the '*Desired Conditions (FW-DC-RECSKI) 01*' on page 82, to read; "Activities such as zip lines, alpine slides, and downhill mountain bike trails with infrastructure are available at existing downhill **and nordic** ski permit areas" This is in compliance with the new law.

### **Emerging Recreation Technologies**, page 84 (FW-GDL RECTECH)

- Ask to add a new guideline (02) Use of new recreation technologies not currently authorized may be allowed when sufficient study or testing has taken place per the development class of associated recreation setting.

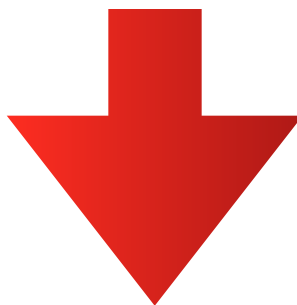
**MMBA suggests that you download this pdf of our talking points, or *copy and paste these talking points* into your own letter offline, and then *paste a copy of your comment letter* into the online comment form.**

**[CGNF Online Comment Link](#)**

**[CGNF Proposed Action Map](#)**

**[CGNF Proposed Actions](#)**

**Background Material Below**





## **Talking Points with Background Information**

### **Proposed Action in Lionhead RWA to discontinue bicycle access**

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## **Background**

**Lionhead Backcountry Area** has high-value among recreation groups similar to the Forest Planners' proposed action for a Buffalo Horn Backcountry Area (BHBA), which presents a proposed management plan to protect wild landscape, wildlife ***and*** bicycle recreational access.

Recommended Wilderness is proposed for much of the Gallatin Range and northern portion of Lionhead area. Proposed suitability characteristics found on page 93 of the Recommended Action removes the ability for land managers to have discretionary management of Recommended Wilderness. We feel that removing recreational uses that haven't harmed Wilderness character or potential Wilderness Congressional designation, to be excessively heavy handed management of our public lands. A modest amount of measured bicycle access is well within the discretionary allowances of CFR 36 219.10 - Multiple Use and the National Planning Rule.

As a solution, ask the Forest Planners to show discretion in the **Lionhead RWA**, and ask to change the wording of FW-SUIT-RWA 04 to allow such discretion.

## **Good Proposed Actions (for bicycle access/continued access) in Big Creek, Swan Creek, Hyalite Creek (Paradise Valley side), Cherry Creek/ Cowboy Heaven, Hyalite Drainage (Gallatin Valley side), Mile Creek Trail, Buffalo Horn Areas**

**Let the Forest Planners know your *approval of these bullet points below*:**

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- Ask the Forest Planners to consider removing Rock Creek and Windy Pass areas, two popular, easily accessible recreation locations from the Gallatin Recommended Wilderness Area boundary.
- Ask the Forest Planners to adjust Recommended Wilderness Area (RWA) boundary to **exclude** Cooper Bench.

### **Background**

Rock Creek/Windy Pass has been important for bicycling and was an important part of the 2006 Travel Plan. Even if the Interim Travel Plan still bans these activities for now, the Forest Plan needs to recognize these activities were vetted through a NEPA process and are still an issue of concern for much of the public. Although bicycling is temporarily banned in Rock Creek and Windy Pass areas, this environmentally friendly recreation survived as an allowable activity in the NEPA vetting process, and we recommend that these areas be removed from the proposed RWA and instead be flexible for future management options.

Cooper bench is located in portions of sections 13, 14, 15, and 23. There should be a change in the RWA boundary near the Big Creek Trailhead in an area called Cooper Bench and this is why: For many decades, Livingston mountain bicyclists would ride Big Creek, and while in the area, would explore adjacent Cooper Bench trails. Also, for many decades Mountain Sky Guest Ranch has conducted private horse ride outings on numerous public recreation user created trails on Cooper Bench leading to a lookout point above. Cooper Bench is popular with the public. The Cooper Bench trails were never properly planned out, but instead evolved, and each year are used commercially. The trails could be rehabilitated to sustainable standards by reconfiguring the tread, grade and then be formally adopted.

### **Unsatisfactory Proposed Action for bicycle access in HPBH WSA**

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As trail builders/maintenance volunteers and natural resource stewards, we reiterate our commitment to our national heritage and respectfully **ask for the following innovations:**

- Request Forest Planners to remove Gallatin Crest Trail #96 from proposed RWA and manage the route as a **Backcountry Corridor** that could permit future bicycling.
- Consider restoring and/or continuing non-motorized bicycle allowance, with a **community-based advisory council to monitor and evaluate all trail usage and conditions as a Forest Plan outcome.**

## **Background**

Cyclists have ridden, explored and cherished the Crest Trail #96 for almost 30 years. Bicyclists are invested in this route, and the Forest Planning public meetings and recent collaborative processes have omitted these ideas for consideration. Of all the trails within the WSA the Crest naturally has the least amount of biological species, which makes it the most environmentally responsible route for any human passage within the WSA. Trail #96, as a narrow pathway, provides unique contributions to all recreation as a distinctly defined corridor through the WSA. Thousands of miles of non-wilderness corridors are components of the National Wilderness Preservation System. Trail #96 should be a **backcountry corridor** through the new Recommended Wilderness Area. For instance, it is questionable whether the Devils Backbone race is appropriate if Trail #96 isn't identified as a unique backcountry corridor. However, a competitive event held within Recommended Wilderness Area might be allowable within a narrow Backcountry Corridor.

Trails within the WSA are far below "sustainable standards," an important component of this Forest Plan draft. To become sustainable most recreation trails need long overdue rebuilding and rerouting. Because of reduced Forest Service budgets, the agency relies on volunteer stewards. Local mountain bike volunteers will address this maintenance backlog with only modest access to trails. For example, Trail #420 on Windy Pass is improperly sited, and could be closed and restored in one season. Mountain bicyclists in collaboration with equestrian groups could install much overdue erosion control wattles. This project has been kicked down the road due to WSA controversy, and it should be addressed as an outcome of the Forest Plan. Bicyclists have demonstrated an effective volunteer work force. A modest amount of measured bicycle access is well within the discretionary allowances of CFR 36 219.10 - Multiple Use and the National Planning Rule.

## **Other Innovations to Mention and Support**

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