

# **CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)**

**P.O. Box 5295  
Helena, MT 59604-5295**

December 19, 2016

Attn: Forest Plan Revision  
Custer Gallatin National Forest  
P.O. Box 130  
Bozeman, MT 59771  
cgplanrevision@fs.fed.us

Re: Comments for the Custer-Gallatin Draft Forest Plan

Dear Forest Planning Team,

We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Custer-Gallatin Draft Forest Plan. We enjoy riding our OHVs on primitive trails and roads in the Custer-Gallatin National Forest. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities.

## **SIGNIFICANT ISSUE: LACK OF MOTORIZED SINGLE TRACK TRAILS FOR MOTORCYCLES.**

## **CAUSE: BLM AND FOREST SERVICE PLANNING PROCESSES WHICH HAVE CLOSED 97% OF THE SINGLE TRACK ROUTES**

### **ISSUES:**

The Custer Gallatin National Forest project area has significant potential for a system of motorcycle single track trails.

There are very few designated motorcycle single track trails in the project area.

There are over 100,000 motorcycles registered in Montana.

Motorcycle cycle single track trails are a highly sought after experience that is in short supply.

The number of "single track" motorcycle trails that motorcycle riders seek has been significantly reduced over the last 35 years through all of the planning processes.

"Single track" is a narrow trail that is approximately the width of the motorcycle. It contrasts with double track or fire road which is wide enough for ATV, UTV, and/or full-sized four-wheeled off-

*We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.*

road vehicles. Single track is frequently smooth and flowing, but it may also exhibit technical rocky sections and may be crisscrossed with tree roots and other obstacles. Some trails are winding and flowing, while others are bumpy and challenging. Many single track trails offer features such as roots, logs and rocks. All of these experiences and challenges are highly sought after by motorcycle riders. Single track trails can also be used by other recreationists including mountain bikers and hikers.

The evaluation needs to distinguish the difference in trail requirements, maintenance, and impacts between ATVs, UTVs, full-size 4x4, and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.

Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails has far less impact than roads in all resource areas and motorcycle single-track trails have far less impact than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decision-making.

The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. Sharing should be a primary goal for use of these lands. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use.

The loss of high quality motorized routes in the Helena National Forest is not a reasonable alternative given the historic use of these routes and the needs of the public for access and motorized recreation. Specifically, the lack of motorcycle single-track trail does not adequately address the issues and the needs of the public for these routes. The reasons used are completely unreasonable. Motorcycles can negotiate and prefer to use trails of the same specifications as hiking and pack stock trails. This proposal does not reasonably acknowledge or consider that motorcycle riders are; willing to share, practice Tread Lightly, have maintained these trails for years, would rather ride their motorcycles on single-track trails and have developed the skills necessary to ride a motorcycle on single-track trails. We are very concerned about the lack of understanding of the needs of single-track motorcycle riders and the complete disregard for their needs. We ask that this very important issue be adequately addressed in the document.

Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. The process has not differentiated between ATV and motorcycle trails in the travel plan alternatives. In order to recognize the different needs and impacts, the evaluation must be differentiated between ATV and motorcycle trails. Figure 2.2 and 2.7 on page 14 of Chapter 2 in the 3-State OHV EIS and Decision clearly shows that existing tracks used by motorcycles are to be considered as motorized trails (<http://www.mt.blm.gov/ea/ohv/Chapter2.pdf>). The evaluation must consider these routes in order to meet the requirements of the 3-State OHV agreement.



Figure 2.2 Motorcycle traveling on single-track trail is not considered cross-country travel.



Figure 2.7 Livestock or game trail used by motorcycles for regular and continuous passage is not considered cross-country travel.

Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.

A strategy should be developed to replace the lost single-track experience. Retention or enhancement of high quality single-track dirt-bike trails is no different than keeping or enhancing "quiet" single-track hiking, equestrian, and mountain-bike trails.

There is no significant impact from the level of dispersed motorcycle trail use in the project area. There is no legitimate or documented conflict of uses between motorcyclists and other uses on single-track trails in the project area. Note that it is not reasonable to define user conflict a merely seeing someone else on a trail. There is a significant need for an adequate number of miles of single-track for existing and future motorcyclists. There is no legitimate reason why the single-track trails in the multiple-use areas of the project should not be shared between motorized and non-motorized recreationists to a much greater extent. This reasonable alternative must be included.

Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail. Additionally, motorcyclists have been keep single-track trails that mountain bikers have recently discovered, open for many years.

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than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decision-making.

The availability of motorcycle single track trails has been significantly negatively impacted by the cumulative effect of many motorized closures enacted as part of travel management plans, resource management plans, monument plans, forest plans and other planning actions.

We request that all existing motorcycle single track trails in the project area be inventoried including historic motorcycle routes.

We request that all existing motorcycle single track trails be included in a pro-recreation alternative.

We request that an enhanced system and new motorcycle single track trails be included in a pro-recreation alternative.

We are looking forward to a reasonable Pro-Recreation plan for the Custer-Gallatin Draft Forest Plan.

Thank you for considering our comments.

Sincerely,

/s/ CTVA Action Committee on behalf of our 240 members and their families and friends  
Capital Trail Vehicle Association (CTVA)<sup>1</sup>  
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<sup>1</sup> CTVA is also a member of Montana Trail Vehicle Riders Association ([mtvra.com](http://mtvra.com)), Blue Ribbon Coalition ([sharetrails.org](http://sharetrails.org)), and New Mexico Off highway Vehicle Alliance ([nmohva.org](http://nmohva.org)),. Individual memberships in the American Motorcycle Association ([ama-cycle.org](http://ama-cycle.org)), Citizens for Balanced Use ([citizensforbalanceduse.com](http://citizensforbalanceduse.com)), Families for Outdoor Recreation ([ffor.org](http://ffor.org)), Montana 4X4 Association, Inc. ([m4x4a.org](http://m4x4a.org)), Montana Multiple Use Association ([montanamua.org](http://montanamua.org)), Snowmobile Alliance of Western States ([snowmobile-alliance.org](http://snowmobile-alliance.org)), Treasure State Alliance, and United Four Wheel Drive Association ([ufwda.org](http://ufwda.org))