



December 21, 2016

Forest Plan Revision
Custer Gallatin National Forest
10 E Babcock, P.O. Box 130
Bozeman, MT 59771

Submitted via email to: cgplanrevision@fs.fed.us

Custer Gallatin Forest Plan Revision: draft Assessment Comments

Dear Forest Plan Revision Team,

Outdoor Alliance Montana is a coalition of human-powered recreation groups representing backcountry and cross-country skiers, climbers, mountain bikers, and paddlers. Our member groups include Winter Wildlands Alliance, Montana Backcountry Alliance, Southwest Montana Climbers Coalition, Western Montana Climbers Coalition, American Alpine Club – Montana Section, International Mountain Bike Association, Southwest Montana Mountain Bike Association, and American Whitewater. We share an interest in how recreation resources are managed on the Custer Gallatin National Forest and hope that we can be a valuable partner for the Forest Service throughout the plan revision process. We appreciate and agree with the statement on page 5 of the Preliminary Need for Change.¹

With this letter we hope to educate the Custer-Gallatin National Forest about some of the non-traditional and dispersed recreational resources on the forest. The Custer-Gallatin is a world-class ice climbing and backcountry skiing destination with regionally significant mountain biking, rock climbing and whitewater paddling. These activities draw both local residents as well as visitors from across the globe to the forest and help to support Southwest Montana's recreation economy. In order to ensure that the Custer-Gallatin continues to provide high quality recreation opportunities, and to protect the forest's unique environment and natural resources in the face of increasing visitation, it's essential that the revised forest plan fully integrate sustainable recreation management into all other aspects of forest management. The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.² To meet this requirement the Custer-Gallatin revised plan must include sustainable recreation plan components, including standards and guidelines (not just desired conditions) that are integrated with plan components related to other uses.

The 2012 Planning Rule requires that Forest Service use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes. Revised plans "must include plan components, including standards or guidelines, to provide for sustainable recreation," including "[s]pecific standards or guidelines where restrictions are needed to ensure the

¹ "There is a need for plan direction to guide the management of new and emerging technologies that may affect recreation opportunities and build in enough flexibility in the Forest Plan that new technologies can be addressed. Advances in technology have greatly impacted the recreation resource in the past 20 years."

² 36 C.F.R. § 219.10(a)



achievement or movement toward the desired [ROS] classes.”³ We encourage the Custer Gallatin to create a winter-specific ROS to complement the standard ROS. The Flathead National Forest developed a winter-specific ROS and the Custer Gallatin should follow this example. Winter-specific ROS classifications are necessary for the forest plan to address the unique recreation settings and management needs that come with the winter season. A winter ROS will also help to set the stage for future winter-specific travel planning where it is needed - on the Beartooth, Ashland, and Sioux ranger districts.

While the Recreation Opportunity Spectrum (ROS) can be an incredibly useful tool for integrating recreation management with other aspects of forest management, particularly as a shorthand for the level of development in a given area, it is not always the best tool for describing recreational resources and opportunities within a given area. For climbers, mountain bikers, kayakers, backcountry skiers, and myriad other active outdoor recreationists, the level of development of a given area is only one attribute among many that combine to make an area a draw for recreational activities. Other attributes like the difficulty and quality of a trail, a river’s whitewater, a climbing area’s rock, or a skiing zone’s topography and snow, are as important or more so to outdoor recreationists as levels of development (at least to a point) and are better accounted for through detailed spatial information. Additionally, while most active outdoor recreational users prefer sites in the most primitive possible condition and would not like to see areas degraded by increased development, it is important to note that high - quality recreation experiences are found in a diversity of settings as described by the ROS.

We believe that describing recreational resources with a high level of specificity is important because of the strong connection with specific places formed by outdoor recreationists, particularly with regard to the type of premier resources found on the Custer-Gallatin. Activities like climbing, whitewater paddling, backcountry skiing, and mountain biking do not occur at random throughout the Forests, but rather at highly specific locations to which visitors often travel for hundreds or thousands of miles and form strong emotional attachments. We believe that carefully accounting for these places of recreational significance is an important step in protecting and enhancing recreation opportunities, minimizing conflicts, ensuring the sustainability of uses, and efficiently allocating Forest Service resources.

In the remainder of this letter we will describe the current situation, desired future conditions, and significance of backcountry skiing, climbing, mountain biking, and whitewater paddling on the Custer-Gallatin. While the draft assessment mentioned backcountry skiing, mountain biking, climbing, and whitewater paddling in passing, we feel it is essential that the Forest Service fully understand the value of the forest for these activities, and the physical locations where they occur, in order to properly integrate sustainable recreation management into the revised forest plan. We especially would like to emphasize that *both* the Custer and the Gallatin are highly valued for recreational activities such as backcountry and cross-country skiing, climbing and mountaineering, mountain biking, and whitewater paddling.

Backcountry and Cross-Country Skiing

While it is likely that skiers have explored every trail and most off-trail areas on the Custer-Gallatin National Forest at some point, and that any area on the forest where there’s enough snow to ski *has*

³ FSH 1909.12, ch. 20, § 23.23a(2)(g)



been skied, there are certain areas of the forest that consistently draw skiers. These areas are depicted on the map that accompanies these comments (Attachment 1). We have also provided an ArcGIS geodatabase containing shapefiles for these areas (Attachment 2).

Beartooth Ranger District

The Absaroka-Beartooth Wilderness provides a lifetime of backcountry ski adventure, with everything from long tours up big river drainages like the Stillwater, to some of the steepest, most technical ski descents in Montana. Many of the same areas that are popular with summer recreationists – the Glacier Lake basin, Lake Fork, West Fork, and East Rosebud – are popular winter destinations as well. Cross-country skiers enjoy touring up the Lake Fork trail, the Silver Run trail network, and the West Fork road/trail network. Backcountry skiers are drawn to steeper slopes, oftentimes further into the backcountry. In the spring the Beartooth Ranger District draws skiers from across Montana and beyond, as the opening of the Beartooth Pass provides access to high elevation terrain and late-season skiing.

Bozeman Ranger District

The Bozeman Ranger District provides a diverse range of backcountry and cross-country ski opportunities and the most popular areas are the Bridger Range, Hyalite Canyon, and Beehive Basin. Chestnut Mountain, Mount Ellis, and the slopes below the Garnet Mountain lookout provide shorter tours and relatively gentle slopes. Skiers visit Hyalite Canyon for everything from steep technical descents on peaks such as Maid of the Mist, Divide Peak, Flanders Peak and Hylalite Peak; to low angle powder turns in Lick Creek and History Rock; to cross-country skiing on snow-covered roads and groomed trails. The Spanish Peaks – especially through the Flying D Ranch - and other high elevation areas, such as the northern Bridgers from just outside of Bridger Bowl to Flathead Pass, draw skiers from November through early summer. Cross-country skiers tour up every snow-covered trail and road on the District and routes groomed by the Bridger Ski Foundation are heavily used.

Gardiner Ranger District

The Jardine area provides quality backcountry and cross-country ski opportunities but the majority of skiing on the Gardiner Ranger District occurs near Cooke City. Deep snow and varied terrain make Cooke City a world-class winter recreation destination. Many skiers in Cooke City use snowmobiles to access terrain further from town on Daisy and Lulu pass and in the Abundance basin. Snowmobiles are also frequently used to get skiers as far as Goose Lake, a popular jumping-off point for skiing the Beartooth high peaks. However, snowmobiles are not a requirement for skiing in Cooke City. Not only are the aforementioned areas frequently accessed on foot, Sheep Creek basin, bordering Yellowstone National Park, provides the closest and easiest access for human-powered skiers looking to make powder turns in Cooke City. Sheep Creek is particularly valuable for skiers because it contains terrain that is safe to ski even on high avalanche danger days – a north facing slope that is steep enough to be interesting but not steep enough to slide, with well-spaced burned trees. The slope directly above town, known locally as “town hill” is also a popular place for quick ski laps. Finally, although mostly on the Shoshone National Forest, everything south of Cooke City - including Republic Mountain, Republic Creek, Woody Ridge, and the Woody/Hayden Creek basin – are all popular human-powered ski zones.

Hebgen Lake Ranger District

The Hebgen Lake Ranger District provides high quality backcountry and Nordic skiing. The trail system near West Yellowstone are renowned for providing some of the best Nordic skiing in the country. Skiers



from as far away as the east coast flock to West Yellowstone for early season Nordic skiing, and these trails draw skiers throughout the winter. The Hebgen Lake district is known for backcountry skiing as well. From Hebgen Ridge to the Taylor-Hilgards, Beaver Creek to Targhee Pass, this district holds good snow, varied terrain, and abundant opportunities for exploration.

Yellowstone Ranger District

Both the Crazy Mountains and the Absaroka-Beartooth Wilderness provide high quality backcountry ski terrain. Many of the trailheads in the Yellowstone Ranger District are accessible year-round due to lack of snow or consistent plowing and as a result, this District is home to many popular ski destinations, including Elephanthead Mountain, the Pine Creek basin, and Emigrant Peak. Cross-country skiers enjoy touring up the snow-covered roads in Mill Creek, generally starting at Snowbank Campground. The Ibex and Porcupine cabins are popular access points for skiers venturing into the Crazies, as is Big Timber creek.

Climbing

The Custer-Gallatin National Forest has played an important role in the history of the sport of climbing in southwest and central Montana. A lifetime of opportunity exists in practically every medium that can challenge passionate climber and mountaineers. Climbers can find rock to scale every month of the year. In the winter months, the ice that forms in Hyalite, Pine Creek, the Beartooths, and other drainages, attracts climbers from all over the country. The high alpine granite found throughout the ranges have provided mountaineering adventure for generations.

Bridger Range

The alpine limestone of the Bridgers is some of the highest quality rock in Montana. Climbers have been developing climbs for decades on this rock, but the last ten years have seen more interest. The NE faces in the northern portion of the range provide respite from the summer heat, and have become a local climber's favorite for the hottest days of summer.

Crazy Mountains

The "Crazies" are filled with technical summits and off-trail adventure. There is also potential for bouldering. Access is an enduring challenge in this area.

Madison Range

The peaks of both the northern and southern Madisons contain remote and technical peak bagging opportunities. There are also many developed technical rock climbs adjacent to the Custer-Gallatin, on BLM lands in Beartrap Canyon, including high quality bouldering along the Madison River.

Gallatin Range

This area has, undoubtedly, the highest concentration of developed and recognized technical climbing in the state. Hundreds of single pitch limestone sport routes exist in the lower layers of rock in the Gallatin and Little Bear Canyon, as well as Chestnut ridge and Frog Rock/Bozeman Pass. Hundreds of routes exist on the gneiss of Hyalite and Gallatin canyons. Hyalite Canyon contains one of the highest concentrations of ice climbs in the U.S., as well as developed technical climbing on the igneous rock in the higher elevations. Recently, increased interest in bouldering has brought a new generation of strong rock climbers to the drainages lining the Gallatin Canyon.



Absaroka Mountains

Many of the drainages on the west side of this range contain technical climbing, including Mill Creek and Yankee Jim Canyon. The high alpine granite offers some incredible alpine rock climbing on Mount Cowen, Emigrant Peak and other notable peaks. There is also ice climbing in Pine Creek and other remote locations.

Beartooth Mountains

This range contains a lifetime of mountaineering opportunities, from peak scrambling to technical rock and ice potential. The limestone walls of the South Boulder drainage at Natural Bridge and Falls is a popular sport climbing area, and multi-pitch routes are abundant up East Rosebud Creek.. Bouldering on the granite talus surrounding the front is becoming increasingly popular.

A majority of the crags, boulders, frozen ice falls, and high alpine peaks are accessed by leaving the recognized NFS trail network. These single-track footpaths (known as *climber's trails*) can often develop beyond that of a faint route through the forest. Since climbers tend to find the path of least resistance, these trails can also form with less than desirable foresight.

The Southwest Montana Climbers Coalition (SMCC) identifies the footpaths that are in disrepair, or that are unnecessary, and coordinates with the NFS to repair, mitigate danger, or erase them. Since 2003, the SMCC has kept an open dialogue with NFS leadership to develop trail maintenance projects, mostly involving volunteer labor. The SMCC also provides materials and labor to replace permanent hardware on developed technical climbs. This safety equipment can deteriorate over time, but requires expertise on replacement.

Mountain Biking

Mountain bikers are able to navigate most trails in Custer-Gallatin National Forest. However, most trails were not designed with mountain bikes in mind. Tight switchbacks, steep pitches and abrupt water bars are often detrimental to the experience on a bicycle, and detrimental to sustainability of the trails. Input from focused recreation groups would help create multi-use trails that are more enjoyable and valuable. Additionally directional trails designed specifically for bikes are becoming very popular. Locally, Big Sky Resort is seeing a lot of enthusiasm and increase in summer tourism as they improve their directional trail system for bicycles.

The Southwest Montana Mountain Bike Alliance (SMMBA), formally Dirt Concern of GVBC, has identified two areas that need stewardship and, if they are thoughtfully developed, could serve the recreational needs of our growing population for many years. These areas are Lower Hyalite - from History Rock Trail to Langhor Campground and the area below Lick Creek Trail to Leverich Canyon (Moser) - and Bridger Bowl. These underutilized areas, both on the Bozeman Ranger District, could accommodate much more use with more, better-planned, trail systems.

Hyalite

There are several qualities that make Lower Hyalite ideal for bicycle and multi-use trails. The pitch of the terrain is varied, but not excessively steep. This gives a lot of options for routing new trails or connecting to existing ones. Lower Hyalite is easily accessible from Bozeman and has a large area that dries out



somewhat early in the spring. A new well-planned system of front country trails is needed, and Lower Hyalite is the correct place to figure out a system that fits the Gallatin Valley's growing recreation trends. Better trail connectivity between and throughout Lower Hyalite and Middle Hyalite (defined as the area above Lick Creek and History Rock Trails and below the HPBHWSA) holds great promise to improve quality of all user's Hyalite experience. Connective, practical trails placed just a bit beyond the road can solve crowding and safety problems caused by diverse travel methods (cars, trucks, walking, horse, and bike) and speeds. Trails could be constructed on both the east and west sides of the road, allowing people to be separated from traffic, and enjoying a somewhat natural experience. While more front country trails is a worthy goal in itself for Hyalite, to provide future recreation; this situation is also a primary public safety issue.

Bridger Bowl

The Bridger Bowl permit area could play a vital role in providing recreation opportunities as well, by providing a summer trails recreation venue location. SMMBA would like to engage Bozeman Ranger District and Bridger Bowl Board in trail planning for the future. Bridger Bowl trails are eroded and unsustainable, fragmented, and not mapped. With a large parking area already developed, a perfect trailhead could be developed. Bridger Bowl could host a number of downhill directional bicycle trails, built and maintained by stewards. This increased stewardship could also help to tackle the weed problem north of Bridger Bowl near Brackett Creek.

Gallatin Roded Area

This large swath of land spans from Little Bear to Porcupine and is an important recreation zone for future trail routes linking Bozeman to Big Sky. Combined with the new ATV routes in Little Bear, the Gallatin Roded Area holds promise to absorb a huge amount of future trail-based recreation. The new Forest Plan should recognize this resource.

Paradise Valley

On the west side of Paradise Valley, between North Dry trail and Big Creek, landowners are preventing public access to 13 sections of Forest Service land. SWMMBA has identified Trail #182 as a key connector across those lands that could link up North Dry Trailheads to Big Creek. All the currently inaccessible trails such as Eightmile Creek and Fridley Creek could be linked via Trail #182. To restore access, careful routing combined with creative and beneficial land trades with the surrounding ranches would have to occur.

A trail loop for bicyclists at Cutler Lake was identified on the 2006 Travel Plan, and is a future project in the Roads and Trails improvement project booklet. Cyclists value the trails in and around this area. SMMBA has also noted that a singletrack connector route is needed along the county road (Old Yellowstone Trail) in addition to the planned project. Parts of the jeep trail linking Cutler Lake to Sphinx Creek are simply far too steep for bicyclists to ride. This trail would be an important shoulder season recreational trail for local cyclists and for some of the visiting Yellowstone tourists carrying bikes.

Fatbiking

Winter Fatbiking access is better, now that snowmobile routes can be shared, but far from ideal. Money has been invested in a tow-behind trail groomer that was put to use a few times during 2015-16 winter season. But all of the grooming efforts, time, and invested money have thus far been for naught, as



some snowmobilers intentionally destroyed all groomed routes within just a couple of hours each time. Fatbike riders and advocates are frustrated by this situation. Wintertime fatbiking routes have been identified, but some are in snowmobile zones and some are in ski zones. The new Forest Plan needs to provide opportunities for winter fatbiking. In places, the public could experiment with joint grooming coordination with ski clubs, trails shared with skiers and snowmobilers, and dedicated groomed winter trail zones.

Whitewater Paddling

Beartooth Front

A handful of classic whitewater runs pour out of Montana's highest mountains, offering a long and unusually late paddling season on runs ranging from beginner to expert. The forks of Rock Creek offer Red Lodge and Billings residents a highly scenic backyard run. West Rosebud Creek has a popular and accessible class IV/V run that is regulated by a dam from which paddling releases are provided most years in July. East Rosebud Creek offers a challenging and beloved run that is threatened by ephemeral hydropower dam proposals. The Stillwater River offers a unique multi-day trip from its headwaters as well as runs of nearly every difficulty before and after leaving the Forest. Like the Stillwater, the Boulder River offers a wide range of opportunities for high quality paddling including the Class III Bible Camp run and the Class IV Hells Canyon run. Together, this suite of rivers offer a high quality paddling destination for regional paddlers.

Crazy Mountains

The Crazy Mountains are home to two of the most unique, picturesque, and challenging whitewater runs in Montana and indeed the US. Big Timber Creek is Montana's signature steep creek, recognized worldwide for its massive slides with names like the Pinch, and the Gambler. Featured in countless films and magazines, the Creek is a travel objective for paddlers far and wide, as well as a staple for local and regional paddlers. Sweetgrass Creek is Big Timber Creeks lesser known neighbor. For those willing to hike the relatively long approach, Sweetgrass offers whitewater comparable to Big Timber but in an even more remote and enchanting backcountry setting.

Madison River

The Madison offers two popular and high quality whitewater runs: Quake Lake, and Beartrap Canyon. The Quake Lake run offers challenging whitewater late in the season, often August and later. This makes the run especially valuable. The unique geology of the run adds to its character. Beartrap Canyon is the classic whitewater run on the Madison featuring some challenging class IV whitewater interspersed with scenic flatwater in a remote canyon.

Gallatin River

Home of the Gallatin Whitewater Festival and significant commercial rafting, the Gallatin River is Bozeman and Big Sky's go-to whitewater run, offering class I-IV road accessible whitewater. The cliffs along the river offer beautiful scenery and the rapids buffer the sounds of the neighboring highway for a pleasant and scenic trip. At peak flows the Gallatin challenges paddlers with big waves and holes, while other seasons offer milder whitewater. The Gallatin is also an important youth paddling resource, and the Taylor Fork offers a class III creeking experience to packrafters and kayakers in stunning setting. Some of the most popular put-ins and take-outs on the Gallatin River could use improved boat ramps.



Also important to Bozeman paddlers is Hyalite Creek, which offers after-work adventure in the City's frontcountry.

Yellowstone

Like the Gallatin and Madison, Yankee Jim Canyon on the Yellowstone is the go to whitewater run for its local community, in this case Gardiner. Its proximity to Yellowstone National Park, long season, and fun forgiving whitewater make it an important whitewater run.

Wild and Scenic River Eligibility

One of the best ways the Forest Service can recognize, support, and protect whitewater paddling is to find these reaches *eligible* for Wild and Scenic Designation for their recreational values. American Whitewater with the coalition, Montanans for Healthy Rivers, has recommended nearly all of these river reaches be found eligible for Wild and Scenic designation, with the exception of West Rosebud Creek.

Conclusion

Outdoor Alliance Montana hopes that this letter and the attached map will help the Custer-Gallatin better understand non-motorized recreation on the forest. In turn, we hope that this information will assist the Forest Service as moves forward in the forest plan revision process.

We would like to follow up on this letter with an in-person meeting to dive further into the Custer-Gallatin's existing, and potential, recreational landscape and will be in touch with Pam Novitzky to set up a time to meet.

In the meantime, please do not hesitate to contact us with any questions. Outdoor Alliance Montana looks forward to being an involved and valuable partner in the forest plan revision process.

Sincerely,

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On behalf of Outdoor Alliance Montana and the above organizations