

March 1, 2018

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Submitted online at https://cara.ecosystem-management.org/Public/CommentInput?project=50185

Re: Scoping comments on the CGNF Proposed Action

Dear Virginia and Forest Planning Team:

Thank you for the opportunity to submit comments on the Custer Gallatin's Proposed Action for forest plan revision. Winter Wildlands Alliance is a national non-profit, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Formed in 2000, WWA has grown to include 39 grassroots groups in 16 states and has a collective membership exceeding 50,000. Three of our grassroots groups: Montana Backcountry Alliance, Beartooth Recreational Trails Association, and Montana Wilderness Association are closely connected to the Custer Gallatin and have a keen interest in this forest plan revision. In addition, WWA members from Montana and across the country deeply value the world-class recreation opportunities and wild lands on the Custer Gallatin National Forest (CGNF) and visit the forest year-round to experience these resources. Winter Wildlands Alliance is heavily invested in the Custer Gallatin forest plan revision and is a member of the Custer Gallatin Working Group and Gallatin Forest Partnership

Montana Backcountry Alliance (MBA) was formed in 2005 to represent the backcountry ski, snowboard, and snowshoe community. MBA's mission is to preserve winter wildlands that provide quality traditional human-powered winter recreation experiences in order to reduce conflict, improve opportunity, and promote safety among backcountry winter users in Montana. The Montana Backcountry Alliance works to protect, expand and enhance non-motorized backcountry winter recreation areas while cultivating a community of traditional, human-powered winter recreationists. We use the backcountry because of the unique opportunity to experience the beauty and solitude of the mountains during wintertime. MBA is not an anti-snowmobile group. We recognize snowmobiles to be appropriate in certain areas. MBA believes, however, that unmanaged snowmobile activity disrupts the quiet traditional backcountry experience and can lead to dangerous user conflicts.

Many people visit the CGNF for winter recreation. With abundant snowfall and extensive terrain, the CGNF is a destination for many kinds of winter recreationists. Backcountry skiers frequent most parts of the forest, from close-to-town touring options in Hyalite Canyon, near Cooke City, and in the Bridger range to Wilderness adventures deep in the Absaroka, Beartooth, Madison, and Gallatin ranges. Backcountry skiers seek out open glades, meadows, and alpine bowls where they can make turns in powder snow. Cross-country skiers and snowshoers enjoy abundant touring opportunities on both groomed and ungroomed trails and ungroomed roads throughout



the forest. In general human-powered skiers tend to travel about 5-10 miles into the backcountry for a daytrip but many people enjoy longer overnight trips into more remote areas. Non-motorized users – skiers and snowshoers – prefer to recreate in areas where over-snow vehicle activity is absent or rare. Finally, one cannot talk about winter recreation on the Custer Gallatin without mentioning the world-class ice climbing opportunities this forest provides. Climbers from around the world travel to Bozeman to climb in Hyalite Canyon from November through March. Ice climbing also has a long history in the Absaroka and Beartooth mountains, with these areas offering a wide range of ice climbing opportunities as well.

Our comments reflect our interest in ensuring that the Custer Gallatin Forest Plan recognizes and manages for human powered winter recreation as an important component of the recreational landscape on the forest and that the revised Forest Plan protects winter wildlands. We hope to see a Forest Plan that protects and promotes opportunities for human-powered recreation and manages over-snow vehicles in a manner that does not unduly impact wildlife, other users, or the environment.

In addition to these comments, we are signed on to comments submitted by Outdoor Alliance Montana, which touch on recreation issues more broadly. Please consider Outdoor Alliance Montana's comments as part of this letter, incorporated by reference.

Gallatin Forest Partnership Agreement

Winter Wildlands Alliance and Montana Backcountry Alliance are members of the Gallatin Forest Partnership and support the Gallatin Forest Partnership Agreement. We ask that the Forest Planning team consider the Gallatin Forest Partnership recommendations as an alternative in the development of its Draft Environmental Impact Statement.

The Gallatin Forest Partnership (GFP) Agreement protects habitat connectivity and quality and balances a wide diversity of recreation uses across the Gallatin and Madison ranges. As part of the GFP, we have recommended over 124,000 acres of land for Wilderness and ask that these places be managed for foot and stock travel only. Our agreement also recommends two Wildlife Management Areas – West Pine and Porcupine Buffalo Horn – where existing recreation uses would continue per the 2006 travel plan but where wildlife management would take priority. In addition, we recommend expanding mountain bike opportunities in the West Pine area. And, our agreement seeks to protect Bozeman's water supply by designating the Hyalite and Bozeman Creek watersheds as the Hyalite Watershed Protection Area. We believe this designation and the management we describe in the GFP Agreement will give the Forest Service flexibility and options for protecting this important watershed while recognizing and managing the high level of recreation use the area receives.

The GFP Agreement represents the first agreement diverse stakeholders have ever reached around how to manage the Hyalite Porcupine Buffalo Horn Wilderness Study Area and we hope that the Forest Service will incorporate our recommendations into the forest plan.

Priority Areas for Human-Powered Winter Recreation

The CGNF hosts a wide variety of human-powered winter recreation opportunities. Backcountry skiers seek out open slopes greater than 20 degrees while Nordic tourers and snowshoers utilize



snow-covered summer trails, unplowed roads, and open rolling terrain. Classic track and skate skiers flock to the many miles of groomed trail across the forest, with the Rendezvous ski trail system in West Yellowstone drawing Nordic skiers from across the country. Groomed trails on the Bozeman and Beartooth Ranger Districts and highly valued by local cross-country skiers and diversify options for visitors to communities like Bozeman and Red Lodge. Hyalite canyon is world-renowned for ice climbing but ice climbers also seek out less well-known areas in other parts of the forest, particularly the Absaroka and Beartooth mountains. Fat tire biking is a growing winter use on the forest as well.

Several factors combine to make certain areas more appealing to human-powered recreationists – access, terrain, and snowpack. In general human-powered recreationists utilize snow-covered areas within 5-10 miles of plowed roads or parking areas. That said, technological advances that have made equipment lighter and easier to use, and ever-growing popularity of these sports, have caused more people to travel further into the backcountry more so than in years past. In addition, this area has a long history of skiers traveling deep into the Lee Metcalf and Absaroka-Beartooth Wilderness areas on multi-day tours. Given the wide range of human-powered winter activities on the forest and the vast expanse that the CGNF covers, it can be assumed that almost every part of the forest that receives snow is visited by a winter recreationist in some manner. However, a few key areas stand out as priorities for the human-powered winter recreation community.

- Granite Creek area near Hebgen Lake. This is a popular and easy-to-access area with a long history of backcountry skiing. It is completely non-motorized at present and we believe it should stay non-motorized and undeveloped. This is one of the few places on the CGNF, and the greater region, where skiers can access extensive vertical terrain with very little approach. In addition to the ease of access and sheer vertical of the terrain, the area's old growth Douglas fir forest is an integral piece of the skier's experience. The forest creates well-spaced glades for skiers to travel through logging and/or motorized use in this area would ruin the backcountry ski experience
- Northern Bridgers. Defined as the area north of Bridger Bowl, the Northern Bridgers are perhaps the more popular destination for Bozeman-based backcountry skiers, including hybrid skiers (skiers who use snowmobiles to access the backcountry). Unplowed roads in the northern Bridgers, and the trails on the east side of the Bridgers, are also extremely popular with cross-country skiers and snowshoers. As we detail later in these comments, we believe there is a need to update the Gallatin winter travel plan to better separate motorized and non-motorized uses in the Bridger Range.
- **Cooke City**. Human-powered winter recreation has a long history in the Cooke City area, dating back to the region's gold mining days, but backcountry skiing in Cooke City has skyrocketed in the past 10 years. When the Gallatin travel plan was signed there were no ski guides operating in Cooke City but today this town of 100 year-round residents boasts two ski guiding businesses. Although only one of these businesses operates on the forest (the other operates solely in Yellowstone) both are testament to the popularity of backcountry skiing in the Cooke City area. We believe that minor tweaks to the Gallatin travel plan could improve the backcountry ski experience while not detracting in any way from the equally popular snowmobile experience, and ultimately reduce conflict between these uses. These include restricting snowmobile use to the groomed road on "town hill" and prohibiting snowmobile use on the Erma Mine ski trail. We encourage the Forest



Service to host a public forum to discuss winter recreation in Cooke City as an opportunity for the community, and those who travel there to recreate, to discuss these issues.

- **Beartooth Pass**. The Beartooth Pass is perhaps *the* preeminent early summer ski destination in the United States. Although much of the road-accessed skiing off of the Pass is on the Shoshone National Forest, the popular Rock Creek Headwall is accessed from the CGNF. In addition, skiers take advantage of firm spring snow to quickly traverse the Beartooth Plateau and gain access to the high peaks of the Beartooths and embark on multi-day tours.
- **Paradise Valley**. Emigrant Peak, Black Mountain, and Mill Creek are perhaps the most frequently skied areas in the portion of the Absarokas accessed from Paradise Valley. Backcountry skiers seek out steep terrain in these areas while cross-country skiers enjoy touring on snow-covered roads in Emigrant Gulch and Mill Creek. In addition, the Pine Creek drainage contains a number of ice climbs including the popular Blue and Green gullies, which hold historical significance for the sport. Current travel management in this area works well and we encourage the Forest Service to continue on course. In addition, we support the proposed mineral withdrawal for Emigrant Gulch and are actively participating in that process.
- Hyalite and Bozeman Creek. Hyalite is popular with almost every type of recreation, in every season, and human-powered winter recreation is no exception. Cross-country skiers and snowshoers love to visit Hyalite canyon to explore seemingly endless miles of groomed trails as well as ungroomed roads and trails while backcountry skiers enjoy everything from low angle meadows in Lick Creek and History Rock to steep couloirs in the high peaks of the Gallatin Range and long alpine tours such as the well-known Gallatin Crest traverse. And, ice climbers from around the world drive to the Grotto Falls and East Fork trailheads to access the highest concentration of naturally occurring water ice climbs in the nation. Current winter travel management is effective at balancing motorized and non-motorized winter recreation in Hyalite and we support continuing to manage the majority of the canyon for non-motorized winter recreation.
- **Mt. Ellis**. This area provides a close-to-town option for Bozeman backcountry skiers. Accessed from state land, Mt Ellis is close enough to Bozeman for a short tour but provides enough terrain for an all-day adventure. Cross-country skiers also enjoy touring past Mt. Ellis towards Mystic Lake.
- **Beehive and Bear Basins.** Located in the Lee Metcalf Wilderness, this area provides high quality backcountry skiing opportunities with a short approach, making it very popular. Parking is extremely limited and conflicts between recreationists looking for a place to park and private land owners are common. We encourage the Forest Service to explore options for better managing parking over the life of the revised forest plan.
- **Rendezvous Ski Trails**. As mentioned previously, this Nordic trail system draws skiers from near and far. It is an important and positive element of West Yellowstone's winter economy.

We are supportive of the proposed Recreation Emphasis Areas in the Proposed Action. However, we suggest that the Forest Service also consider designating a portion of the Bridger Range and the West Fork of Rock Creek as Recreation Emphasis Areas. These areas receive high levels of visitor use year-round and focused management would help protect resources and reduce or prevent use conflicts. In addition, the revised plan should contain detailed plan components for



each Recreation Emphasis Area to provide a framework for how these areas will be managed, unique to each area's qualities, opportunities, and challenges.

OSV Management

Our organizations have a keen interest in over-snow vehicle (OSV) management on National Forest lands because OSV management and use has direct impacts on human-powered winter recreation. Because OSVs can cover more ground more quickly than people on foot, OSV recreation disproportionately consumes a limited but valuable resource, powder snow. In addition, slopes displaying dozens of "high mark" tracks can take away the natural beauty of the landscape for some even if there are no OSVs physically present when these tracks are observed. The deep tracks of snowmobile can also create a hazard when skiing down a slope, or quickly "track out" a slope, rendering it un-skiable. Safety is also a concern as there is the possibility of collision with a snowmobile, or a risk of a snowmobile triggering an avalanche from above. Alternatively, an OSV can diminish the sense of risk or wildness that many skiers seek because they effectively reduce the distance from safety.¹ OSV recreation also impacts non-motorized recreation experiences by degrading air quality and increasing noise levels. For these many reasons, skiers and snowshoers can be displaced from areas with heavy OSV use. At the same time, in some parts of the forest OSV and human-powered recreation can effectively share the landscape. There is no one-size fits all rule for how to manage winter recreation the CGNF and we have some suggestions for how the revised forest plan can better serve the winter-recreating public.

The OSV Rule

In response to the growing use of dirt bikes, snowmobiles, all-terrain vehicles, and other off-road vehicles (ORVs) and corresponding environmental damage and conflicts with non-motorized users, Presidents Nixon and Carter issued Executive Orders 11644 and 11989 in 1972 and 1977, respectively. The executive orders require federal land management agencies to plan for ORV use to protect other resources and recreational uses. Specifically, the executive orders require that, when designating areas or trails available for ORV use, the agencies locate them to:

- (1) minimize damage to soil, watershed, vegetation, and other resources of the public lands;
- (2) minimize harassment of wildlife or significant disruption of wildlife habitats; and
- (3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands.²

Thirty-three years after President Nixon issued Executive Order 11644, the Bush Administration – citing unmanaged recreation as one of the top four threats facing the national forests – published the Travel Management Rule in 2005. The rule codified the executive order "minimization criteria," but it specifically exempted OSVs from the mandatory requirement to designate areas and trails in accordance with the criteria.³ Winter Wildlands Alliance successfully challenged the exemption in federal court. In the resulting 2013 decision the court determined that subpart C of the rule violated the mandatory executive order requirement that the Forest Service designate a

¹ Adams, J.C., and S.F. McCool. 2010. Finite recreation opportunities: the Forest Service, the Bureau of Land Management, and off-road vehicle management. Natural Resources Journal 49: 45-116.

² Exec. Order No. 11644, § 3(a), 37 Fed. Reg. 2877 (Feb. 8, 1972), *as amended by* Exec. Order No. 11,989, 42 Fed. Reg. 26,959 (May 24, 1977).

³ 36 C.F.R. §§ 212.51(a)(3), 212.55(b).



system of areas and routes – *based on the minimization criteria* – where OSVs are permitted.⁴ The court directed the agency to issue a new rule consistent with the executive orders. The Forest Service finalized the revised subpart C in January of 2015.

Revised Subpart C, or the OSV Rule, requires each national forest unit with adequate snowfall designate and display on an OSV use map a system of areas and routes where OSVs are permitted to travel; OSV use outside the designated system is prohibited.⁵ Thus, rather than allowing OSV use largely by default wherever that use is not specifically prohibited, the rule changes the paradigm to a "closed unless designated open" management regime. Forests must apply and implement the minimization criteria when designating each area and trail where OSV use is permitted.⁶ Any areas where cross-country OSV use is permitted must be "discrete, specifically delineated space[s] that [are] smaller . . . than a Ranger District" and located to *minimize* resource damage and conflicts with other recreational uses.⁷

The Gallatin portion of the CGNF completed a Subpart C travel plan in conjunction with its Subpart B plan, before Subpart C was required. This winter travel plan is now 10 years old and while it has generally aged well, the forest plan revision process is an opportunity to examine whether or where the Gallatin winter travel plan could be improved and set the stage for doing so. The Custer portion of the CGNF does not have a winter travel plan. Winter travel planning is urgently needed on the Custer National Forest, particularly on the Beartooth District. There is a need to address use conflicts on the West Fork road, including defining what types of OSV use are permissible on the groomed route, and to ensure OSV use is not causing impacts to natural resources elsewhere on the district. The revised forest plan should include plan components set the stage for winter travel planning on the Custer, including a timeline for when the forest will begin the winter travel planning process.

In its revised forest plan the CGNF should reinforce the Travel Management Rule's provisions through relevant forest plan standards. The plan should provide a programmatic framework for managing OSV use that includes, at a minimum: (1) suitability determinations for OSV use that address both legal suitability (e.g., motorized use is prohibited in Wilderness) and practical suitability based on terrain, snowpack, wildlife habitat, and other condition that impact OSV travel; (2) season dates; (3) minimum snow depths or minimum snow water equivalencies; (4) Recreation Opportunity Spectrum (ROS) classifications; and (5) clear statements that any implementation-level area and route designations will be consistent with suitability determinations and ROS classifications, but that all suitable, motorized areas will not necessarily be open to off-road vehicle use. Instead, the forest should designate discrete open areas and trails within those areas that are located to minimize resource impacts and conflicts with other recreational uses.

Season Dates

⁴ Winter Wildlands Alliance v. U.S. Forest Service, No. 1:11-CV-586-REB, 2013 U.S. Dist. LEXIS 47728, at

^{*27-36 (}D. Idaho Mar. 28, 2013) (explaining that OSV "designations *must* be made and they *must* be based on the [minimization] criteria") (emphasis in original).

⁵ 36 C.F.R. §§ 212.81, 261.14.

⁶ 36 C.F.R. §§ 212.81(d), 212.55(b).

⁷ 36 C.F.R. §§ 212.1, 212.81(d), 212.55(b).



The revised forest plan should include season dates for when OSV travel is allowed on the forest. We understand that under the Gallatin travel plan many areas of the forest already have seasonal OSV restrictions, however, this is not the case on the Custer portion of the forest, and to our knowledge there is no over-arching OSV use season defined for any portion of the CGNF. Given how vast and varied the CGNF is, differing season dates by geographic area may be appropriate. In addition, the CGNF should strive to align OSV season dates with neighboring land managers to ensure consistency across landscapes and ease of understanding and use for the public. For example, cross-country travel in designated areas open for OSV use is allowed on the Beaverhead-Deerlodge National Forest from December 2 through May 15. Likewise, the Shoshone National Forest is working on a travel plan, in which they have proposed an OSV use season of November 15-May 15 for portions of the forest that border the CGNF (Beartooth District). There has been a drastic increase in spring snowmobile use on the Beartooth Pass in recent years. Much of this increase can be attributed to the growth in hybrid skiing and to skiers bringing snowmobiles to the Pass over Memorial Day weekend. This is causing conflict with other forest visitors – humanpowered skiers as well as tourists out for a scenic drive – and is damaging fragile alpine plant communities, as snowmobiles are frequently driven over areas with little to no snow in order to connect patches of existing snow. In addition, we have observed (and reported to the Forest Service) snowmobile users riding into the Absaroka-Beartooth Wilderness from the state line parking area. Following the Shoshone's lead in prohibiting OSV use on the Pass come spring would eliminate these issues.

The final EIS and final plan should make clear that winter ROS settings do not preclude or determine future travel planning decisions. Chapter 10§11.2 of the revised Travel Management Planning directives state "The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis." Given that application of the minimization criteria are not part of the process wherein ROS classifications are assigned, ROS classifications cannot serve a dual purpose as over-snow vehicle area designations. Likewise, management area suitability determinations are not a substitute for Subpart C winter travel planning.

Minimum Snow Depth/Minimum SWE

In addition to defining an OSV use season, the CGNF should also set a minimum snow depth or density restriction across the forest. The Forest Service's Best Management Practices for water quality management call for forests to institute minimum snow depths, stating that forests should: "Specify the minimum snow depth for each type or class of over-snow vehicle to protect underlying resources as part of any restrictions or prohibitions on over-snow use."⁸ Defining a minimum snow depth will help the forest plan be adaptive in the face of climate change. The snow season is changing and having flexibility built into the plan is key for ensuring that the impact of winter motorized use is minimized regardless of when that use occurs.

⁸ USFS 2012. National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide. Rec. 7 – Over-Snow Vehicle Use. Available at <u>http://www.fs.fed.us/biology/resources/pubs/watershed/FS_National_Core_BMPs_April2012.pdf</u>



A minimum snow depth/density restriction does not mean that there must be an even blanket of at least 18 inches of snow across the Forest. It is a management tool to help the Forest Service minimize OSV impacts and provide consistency. The CGNF should determine a set number of snow measuring stations based on local knowledge of locations that are indicative of larger areas. The Forest Service can use Snotel data paired with on-the-ground observations to determine where appropriate locations for these measuring stations should be. The measuring stations should be located in places where they can help the district rangers determine whether the snowpack at specific OSV use areas has reached the minimum depth. Because of the Gallatin National Forest Avalanche Center, the CGNF is better positioned than most forests in the nation to track snow depth across the forest and communicate with the public about when there is sufficient snow to support OSV recreation. By setting a forest-wide minimum snow depth, the CGNF then ensures that each district ranger has a consistent standard to help them determine how much snow is sufficient to protect forest resources.

The best available science shows that minimum snow depths should be at least 18 inches for cross-country travel and 12 inches for travel on groomed trails or roads.⁹ Recognizing that the buffering power of snow varies depending on density, we also encourage the CGNF to explore the possibility of implementing a minimum snow density (SWE) rather than snow depth. To our knowledge no research has been done on this topic to determine how much SWE is necessary to mitigate OSV impacts to soils, vegetation, and subnivian habitat. However, WWA is currently working with snow scientists in the northern Sierra on a snow compaction study that we hope will shed some light on this topic. We will keep the CGNF updated when the project is completed and results are available. At any rate, any snow depth or SWE restriction should be paired with a plan to monitor and enforce minimum snow depth restrictions, including implementing emergency closures when snowpack falls below the relevant thresholds. Many National Forests include a snow depth minimum as part of their OSV management toolbox and the CGNF should do the same.¹⁰

The Chugach National Forest uses a combination of a season dates and minimum snow depths to very successfully manage OSV use even as climate change is significantly changing the snow season on the forest. On the Chugach OSV season starts on December 1. However, if there is not enough snow by this date (fewer than 12 inches of consolidated snow), or if the snowpack decreases substantially at some other point in the season, the local district ranger issues a special order to close specific areas until there is sufficient snow.¹¹ Sometimes this means an entire district is closed and other times it may be just one trailhead or use area. When there is a special closure order in place the Forest Service posts notices at trailheads, online, and at district offices. Similarly, the Chugach alerts the public when the closure order is lifted. During the closures district law enforcement officers monitor winter trailheads to ensure compliance.

<u>Wildlife</u>

⁹ Snowmobile Best Management Practices for Forest Service Travel Planning: A Comprehensive Literature Review and Recommendations for Management at 14. Available at <u>http://winterwildlands.org/wp-content/uploads/2015/06/BMP-Final.pdf</u>

¹⁰ See for example, Tongass NF MVUMs: <u>http://www.fs.usda.gov/detail/tongass/maps-pubs/?cid=stelprdb5430063</u>.

¹¹See <u>http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5441982.pdf</u>



The CGNF is an integral part of the Greater Yellowstone Ecosystem, providing habitat connectivity for wildlife moving throughout the Ecosystem, and in and out of Yellowstone National Park. For many of these species winter is a critical time of year.

Wolverine and lynx are both snow-dependent species, specially adapted to wintery habitat. The Northern Rockies Lynx Management Direction continues to apply to the CGNF and should be integrated into the revised forest plan. We suggest that the CGNF consult the recently revised Flathead forest plan for examples of plan components that promote lynx conservation. For example, we suggest adding the following plan component based off of the Flathead plan:

 FW-STD-WLLX 01 To provide ecological conditions to support Canada lynx on NFS lands at a forestwide scale, there should be no net increase in miles of designated routes for motorized over-snow vehicle use, groomed routes, or areas where motorized over-snow vehicle use is identified as suitable. This guideline does not apply inside permitted ski area boundaries, to winter logging, to rerouting trails for public safety, or to accessing private inholdings.

Recent research has shown that high levels of human activity – motorized and non-motorized recreation – can impact wolverines. The most comprehensive study of recreation impacts on wolverine to date indicates that wolverines avoid areas of both motorized and non-motorized recreation, with an increasing level of avoidance corresponding to the amount of exposure a wolverine gets.¹² Female wolverines appear to avoid areas of heavy backcountry snowmobile use while both males and females avoid areas with heavy backcountry ski use. In this study, high intensity snowmobile use was found to be a more significant factor influencing wolverine movement, although both motorized and non-motorized recreation was significant. In addition, because snowmobile use covers a much larger area than backcountry ski use (because snowmobiles travel much further in a day than a human-powered skier does), OSV recreation can impact a much larger swath of wolverine habitat. Specific recreation activities aside, however, what this study points to is the impact that increasing human use can have on the wildlife species who live in the places where we play. It is important that the revised forest plan consider population growth and future impacts to wildlife, and take proactive measures to ensure that human use can continue in balance with wildlife protection. For example, we suggest adding the following plan component based off of the Flathead plan:

• **FW-GDL-WLWV 02** To limit the risk of cumulative impacts to female wolverines with dependent young, there should be no net increase in the percentage of modeled wolverine maternal denning habitat identified as suitable for motorized over-snow vehicle use NFS lands at a forestwide scale.

The CGNF should also take care to ensure that critical winter range, as identified by MT Fish Wildlife and Parks, is protected from disturbance in the revised forest plan. These winter range areas should not be identified as suitable for cross-country OSV travel. In addition, if there are key

¹² Heinemeyer et al. 2017. *Wolverine-Winter Recreation Research Project: Investigating Interactions Between Wolverines and Winter Recreation. Final Report.* Available at

http://wolverinefoundation.org/wp-content/uploads/2017/12/Wolverine-Winter-Recreation-Final-Report-15Dec17.pdf



areas that are particularly sensitive to disturbance we would support closing these areas to *all* human entry during critical times of the year, recognizing that this type of site-specific closure would need to be made in a subsequent site-specific planning process and that Forest Plan suitability represents a desired condition.

The revised forest plan should use the Recreation Opportunity Spectrum to integrate recreation management with wildlife habitat management as well as other elements of the forest plan. The forest cannot be managed in silos – recreation, wildlife, timber, grazing, fire, weeds, and all the other "pieces" of forest management must be thought of and managed as pieces of a complete whole.

Recreation Opportunity Spectrum

We are pleased to see that the CGNF included a winter-specific ROS. However, the winter ROS mapped in the Proposed Action deems far too much of the CGNF as suitable for winter motorized use. It is our understanding that the ROS classifications presented in the Proposed Action are based on current conditions – MVUMs and OSVMs – and a GIS exercise. In the DEIS and eventual revised forest plan the ROS maps should reflect *desired conditions*, not current conditions. As currently portrayed, the winter ROS maps show far more areas as suitable for winter motorized use than we feel is appropriate. It's impossible to discern details on the maps provided with the proposed action, but based on these maps and the Gallatin OSVUM, we suggest the following changes to the winter ROS maps:

- Forest-wide: The Gallatin National Forest over-snow vehicle use map (OSVUM) includes 9 detail maps highlighting the areas people snowmobile on the forest. These 9 maps do not show every acre covered by the Gallatin travel plan, just those where OSV recreation occurs. Areas of the Gallatin portion of the forest that are not included on one of the 9 OSVUM detail maps should be classified as semi-primitive non-motorized or primitive in winter, except for those areas with plowed roads open to wheeled vehicles, groomed trails, or designated OSV trails.
- Absaroka-Beartooth: The small area of CGNF between the Bannock snowmobile trail and Shoshone forest boundary should be semi-primitive non-motorized. The only trails in this area are the Woody Falls and Erma Mine cross-country ski trails. Currently the Erma Mine trail is not officially closed to OSVs despite being a cross-country ski trail and snowmobile use on this trail has increased dramatically over the past 10 years despite the fact that the trail is only 1 mile in length and dead-ends at a Wilderness boundary. The forest plan should state a desired condition for this area to be semi-primitive non-motorized in winter. The Woody Falls trail is non-motorized year-round.

Interest in skiing the Emigrant Peak massif is on the rise. Many people, not understanding the ruggedness of the Emigrant Gulch Road have driven the single track only to get vehicles stuck in dry years. In wet years, some people choose to ride snowmobiles past the Gulch Road and up into the first basin on the East side of Emigrant Peak. This mountain is an important human-powered backcountry ski area. It is closed to OSVs on the OSVUM and it appears to be classified as semi-primitive non-motorized in winter on the ROS map in the Proposed Action, which we support. However, given the OSV trespass



that occurs on the Peak, and the resource damage that wheeled vehicles cause in winter on the Gulch road, we encourage the placement of a seasonal (winter) gate closure by the Emigrant Creek culvert to help protect the resource from wheeled vehicles. The gate should be accompanied by a sign indicating that Emigrant Peak is closed to OSV use.

• Bridger, Bangtail, and Crazy Mountains: The winter ROS map shows that the majority of the Bridger range is semi-primitive motorized despite the fact that the vast majority of winter recreation in the Bridger range is non-motorized. Having had the Gallatin travel plan in place for over a decade, we believe the forest plan revision is the perfect opportunity to reflect on what does and does not work in this plan and build a framework for revising the travel plan where needed. The Bridgers are perhaps the place where the Gallatin travel plan is in most urgent need of updating. For example, although the entire west half of the Bridgers is currently open to OSV use in winter, in reality this use is rare to non-existent in most places and if it were to occur, would cause intense social conflict with winter hikers and skiers. The west side of the Bridgers from *at least* Corbly Gulch and south should be semi-primitive non-motorized.

Although OSV use is common on the east side of the Bridgers, the current travel plan has shown to be difficult to enforce and use conflicts arise annually in predictable areas. Current motorized/non-motorized boundaries are in many places based on elevation rather than a distinct geographic feature. We suggest that the Forest Service re-evaluate where OSV use is suitable on the east side of the Bridgers with a focus on clearly separating motorized and non-motorized uses. The revised forest plan should set the stage for updating the travel plan by making changes to the winter ROS map for the Bridgers, classifying more area as semi-primitive non-motorized in winter. The boundary between areas that are winter semi-primitive non-motorized and semi-primitive motorized should follow roads, ridgelines, or other clearly delineated features.

The Middle Fork and South Fork of Bracket Creek offer important human powered trails and road access for backcountry skiers, cross country skiers and snowshoers. These user groups have no interest in competing with the sound and power of motorized recreation and, indeed, these areas are not designated as open to OSV use in the Gallatin travel plan. Unfortunately, up in the high country by Ross Peak and the backcountry ski area just south of Ross Pass locally known as "Sesame Street, Burt and Ernie, or the playground," more and more winter motorized violations have been observed each year. Likewise, there is an increasing problem with OSV incursions in a non-motorized area just to the south of Naya Nuki Peak known as "the Throne". In this area OSVs are routinely highmarking all the way to the top of the feature that skiers descend from. Part of this problem is due to the advance in technology with timbersleds.¹³ Another part of the problem is the lack of education and lack of signage explaining the OSV closure. The revised forest plan should include plan components that speak to better enforcing travel plan designations, including working with partners to educate recreation users about which areas are and are not open to motorized use and investing Forest Service

¹³ <u>http://www.timbersled.com/en-us</u>



enforcement resources. We encourage the Forest Service to post multiple signs along the OSV area boundaries, as well as post clear maps at winter trailheads.

To the north side of the Fairy Lake drainage at Peak 9474, just ¼ mile north of Hardscrabble Peak, we believe the ridgeline boundary running west to east between Fairy Lake and Frazier Basin is an important natural boundary to use for containing OSV use to the south. Backcountry skiers enjoy traveling to the couloirs in Frazier Basin from the Seitz Road/Shafthouse Trailhead. This is currently a zone that is far enough from motorized use that skiers can have a quiet winter experience. The area from the Peak 9474 to Flathead Pass should be classified as semi-primitive non-motorized in winter.

Overall we are supportive of the ROS plan components in the Proposed Action. Because the Forest Plan does not make travel planning decisions, any changes in OSV suitability (through ROS classifications in the revised forest plan) must be followed by site-specific planning to update the Gallatin travel plan. Or, in the case of the Custer, to create a winter travel plan.

Therefore, in addition to what is in the Proposed Action we suggest the following additional plan components for the ROS portion of the CGNF plan:

- **FS-OBJ-ROS 01** Site-specific winter travel planning on the Custer portion of the National Forest will be initiated within 3 years of plan implementation to designate specific routes and areas for over-snow vehicle use within those ROS classifications where winter motorized use is suitable.
- **FS-OBJ-ROS 02** Site-specific analysis to make changes to the Gallatin travel plan, to comply with the revised forest plan, will be initiated within the first year of implementation of the revised forest plan.
- **FW-SUIT-ROS 03** Over-snow vehicle use is not permitted off of designated routes within winter rural ROS areas.

Recommended Wilderness Areas

We are supportive of the suitability plan components outlined in the proposed action. Motorized and mechanized uses are not appropriate in Recommended Wilderness Areas. However, we do encourage the Forest Service to consider how a RWA designation would affect existing uses and if possible, locate RWA boundaries in a manner that reduces conflict with non-conforming recreational uses.

Research Natural Areas and Special Areas

Because it is important to preserve the unique natural environment within Research Natural Areas and Special Areas we proposed the following additional plan components to what is included in the Proposed Action:

- **FW-STD- RNA 10** New saleable mineral development shall not be allowed.
- FW-GDL- RNA 03 New oil and gas leasing shall not be allowed.



- **AB-SUIT-RNA 07** New oil and gas leasing is not allowed within the Line Creek Plateau Research Natural Area.
- **AB-SUIT-RNA 08** Development of existing oil and gas leases within the Line Creek Plateau Research Natural Area is subject to no surface occupancy stipulations.
- FW-GDL-SA 03 New oil and gas leasing shall not be allowed.

We are particularly concerned about protecting the integrity of the Line Creek Plateau Research Natural Area. We support the plan components in the Proposed Action, in addition to the new components we list above.

Thank you for considering these comments. We look forward to continuing the engage in the Custer Gallatin forest plan revision.

Sincerely,

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