



PO BOX 1855  
BOZEMAN, MT 59715

SOUTHWESTMONTANAMBA.ORG

September 7, 2020

Objection Reviewing Officer  
USDA Forest Service, Northern Region  
Building 26  
Fort Missoula Road  
Missoula, MT 59804

Submitted electronically at:  
<https://cara.ecosystem-management.org/Public//CommentInput?Project=50185>

Re: Custer Gallatin Forest Plan Draft ROD Objection

To whom it may concern,  
Southwest Montana Mountain Bike Association (SWMMBA) submits this objection to the Custer Gallatin Forest Plan revision Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS). We submitted comments previously in the DEIS and scoping comment periods as well as public meetings.

**1. Key Linkage Areas create uncertainty for mountain bike access (FW-SUIT-WL-01)**

The 2020 Land Management Plan says on page 55:  
*01 Key linkage areas are suitable for mountain biking only on approved system mountain biking routes.*

Although much effort and pain from travel planning is well behind us, it was done with the assumption that mountain bikes are allowed on trails unless otherwise excluded. Average users do not have a clear understanding of approved routes due to typically sparse signage and frankly, not needing extensive trail by trail knowledge outside of RWA and WSA. If this restriction on cross country travel is made, there will be difficult management on the northwest edge of the KLA where a trail crosses back and forth across the border. Also, Gallatin Forest Partnership members agreed that a trail to connect the Dry Divide Trail (#135) into Mystical Bear (#53) should be constructed.

Remedy: We suggest the amending FW-GDL-WL 03 as follows: "To maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed within key linkage areas unless previously authorized by the Gallatin

Travel Plan. New recreation developments may be constructed to address on-going or imminent ecological resource concerns within the key linkage area, including but not limited to, degradation of wildlife habitat connectivity.”

## **2. The 2020 Forest Plan fails to recommend certain areas as Recommended Wilderness**

Recommended Wilderness is an important management tool to protect areas of the highest quality. As a member of OAMT, we support their efforts and expressed this on the first page of SWMMBA’s DEIS comments. On pages 10-12 of the DEIS comments submitted by OAMT, we asked that a number of Recommended Wilderness Areas be included in the final revised plan. In particular, Dome Mountain Recommended Wilderness Area mapped in Alternative D, and a Chico-Emigrant Recommended Wilderness Area were described in the OAMT comment letter. The quality of these lands and proximity to Yellowstone makes them an easy fit for this type of management.

Remedy: The Plan would be improved by changing the aforementioned parcels to RWA management.

## **3. SWMMBA will separately file as an interested party for other issues**

SWMMBA appreciates and agrees with a majority of the forest plan. Objections have been filed which could result in changes to mountain bike access. These are very serious topics for us and we will file as an interested party for those subjects on September 18th or when this opportunity becomes available.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Oliver". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam Oliver, SWMMBA Advocacy Director  
PO Box 1855  
Bozeman MT, 59771  
adam@southwestmontanamba.org