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Comments: Re: Chapter 2, Recreation Settings, Opportunities, and Access, Recreation Settings Recreation Opportunity System (FW-DC-ROS)

Comment 1:

Table 2-16 in the Recreational Settings (ROS) Recreation Opportunity Spectrum identifies acreages for the six ROS spectrum classes. It is unclear, in the current document, if these are current acreages or target acreages.

In the final forest plan, the Forest Service should include tables for both current acreages and target acreages.

Comment 2:

To achieve the Desired Conditions identified in General Recreation (REC) Desired Conditions (FW-DC-REC) the Forest Service should include a scenario in which a significantly higher portion of future semi-primitive forests are designated for non-motorized use.

According to Table 2-16, semi-primitive forests are split approximately 60% to 40% in favor of motorized uses. The Forest Service should include a scenario which reverses these percentages, designating approximately 30% of forests for non-motorized use in summer and winter months in order to achieve its stated Desired Conditions:

"01 Recreation activities contribute to jobs and income in the local economy, community stability or growth, and the quality of lifestyles in the area."

Montana's recreation economy is driven, in part, by its reputation for world-class facilities, including Hyalite for ice climbing, Bridger Bowl and Red Lodge Resort of alpine skiing, and Gallatin Canyon for fly fishing. According to the Outdoor Industry Association's 2016 topline report, mountain biking is the fastest growing recreational activity. The Bangtail Divide trail in the Bangtail Mountains has the potential to be the first of Montana's "trophy" destinations for mountain biking if motorized travel is separated from non-motorized travel. Increasing the facilities for mountain biking will better allow the communities in and around the Custer and Gallatin national forests to better capitalize on this national trend in outdoor recreation. The presence of motorcycles on the trail categorically excludes the trail as a destination mountain biking trail (despite being predominantly mountain bike users) by degrades the experience for non-motorized users.

"02 Recreation opportunities promote long-term physical and mental health of the public by encouraging opportunities to connect with nature while pursuing adventure and by instilling a culture of stewardship and appreciation."

For non-motorized users, the forest offers a reprieve from the noise, exhaust, and physical intimidation of sharing an urban environment with motorized vehicles traveling at inhuman speed. Motorized activities are important, as they provide motorized users with an opportunity to connect with nature, but these areas should be separated from locations with significant and growing non-motorized recreation demand.

"03 Recreation opportunities are adaptable to changing trends of desired recreation opportunities and increasing demands and use of the Forest. Additional recreation facilities that accommodate growing demand provide quality recreation experiences and conserve forest resources."

According to data from the Outdoor Industry Association, rates of growth in participation in hiking and mountain biking far exceed the rate of growth among motorized users. Similarly, growth in participation in backcountry skiing far exceed growth in motorized snowsports.

Motorized users require significantly more space to accommodate their recreation than non-motorized uses. In my own assessment, a pair of motorcycles, a dozen mountain bikes, or two dozen hikers all contribute similarly to a sense of the trail being crowded (city-like) and busy. A trail which could afford a quality experience to one hundred hikers in a day might only accommodate twenty-five mountain bikers, or a dozen motorcyclists.

As the total quantity of outdoor recreation increases, the forest plan should adapt to prioritize uses which accommodate a quality experience for the greatest number of users. Gallatin County's population is expected to approximately double in the next 20 years (approximately the same amount of time since the last Forest Plan update), even as outdoor recreation contributes an increasing share to both the regional and statewide economy.

"04 Existing developed facilities, roads, and trails for both summer and winter recreation activities are adaptable for new recreation demands."

Once a trail has been degraded by motorized use, it is extremely difficult to adapt the trail to other or new recreation demands. To better maintain its facilities and trails, motorized use should be concentrated in areas where trails are already degraded by motorized travel.

"05 Recreation facilities, including trails and dispersed sites, and their use have minimal impacts on resources including threatened and endangered species, sensitive species, heritage and cultural sites, water quality, and aquatic species."

Everything else being equal, 500 lb vehicles traveling at high rates of speed have a greater impact on trails and cause more erosion, impacting water quality and aquatic species. Areas designated for motorized use should be separated from areas where threatened and endangered species, sensitive species, water quality, and aquatic species are of particular concern.