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Organization: Winter Wildlands Alliance

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Comments: Please accept the attached comments on behalf of Winter Wildlands Alliance and Montana Backcountry Alliance. We appreciate the opportunity to weigh in on the draft EIS.

Thank you,

Hilary Eisen

Thank you for the opportunity to submit comments on the Custer Gallatin's draft Environmental Impact Statement (DEIS) 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. Our alliance includes 40 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. This visitation is an important part of the region's outdoor recreation economy. According to a 2018 study by the

Outdoor Alliance, tourists visiting the CGNF for non-motorized backcountry snowsports spend an estimated \$16 million annually. This supports an estimated 169 jobs and nearly \$4.7 million in wages each year.¹ These figures do not include local residents, many of whom have chosen to live in Bozeman, Red Lodge, Big Sky, West Yellowstone, and Cooke City because of the opportunity to partake in non-motorized backcountry snowsports on the CGNF.

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, and fully supportive of, 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. Likewise, as members of the Gallatin Forest Partnership (GFP), we fully endorse the Gallatin Forest Partnership Agreement, and incorporate the comments of the GFP here by reference.

Winter recreation has changed dramatically on the CGNF since the previous forest plans were written in the 1980s. Participation in skiing [ndash] at resorts, on Nordic trails, and in the backcountry [ndash] has risen dramatically. Ice climbing on the forest has transitioned from a fringe sport pursued by only a handful of locals, to a major winter recreation use drawing participants from across the world to Hyalite Canyon. Over-snow vehicles (OSVs) have become lighter, more powerful, and more diverse than ever before. Fat tire biking did not exist in the 1980s but is now a popular winter activity. Across all uses more and more people are venturing into the backcountry in the winter and they're going further than ever before. These changes are attributable to population growth in the region surrounding the CGNF (and more broadly) as well as changes in design and technology that make skis, ice tools, OSVs, and other winter recreation equipment easier to use.

Backcountry skiing is the fastest growing segment of the ski industry and the CGNF is a cherished place for the backcountry ski community. While our community highly values Red Lodge Mountain and Bridger Bowl, we do not believe there is a need for any additional ski

1 Maples and Bradley 2018. Economic Impact of Snowsports on the Custer Gallatin National Forest. Available at https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bf31ffac2241bd5ca123063/1542660091193/OA_CusterGallatinNF_SnowsportsStudy2018.pdf

resorts on the forest. Furthermore, any new resort development would inevitably occur in a high-value backcountry ski zone, simply because the terrain and snow that make for good skiing are consistent regardless of whether you are at a resort or in the backcountry. Therefore, we are opposed to FW-STD-RECSKI 01: [ldquo]New downhill ski areas shall be approved only when existing ski areas cannot be expanded to accommodate additional use[rddquo] and request that it not be included in the final plan, or that it be re-worded to read [ldquo]New downhill ski areas shall not be approved.[rddquo]

The Ski Resort section of the final revised plan should address access to the CGNF lands adjacent to ski area boundaries. Accessing the backcountry from within a ski resort (exiting through an open gate) is a growing use, as evidenced by the backcountry terrain adjacent to Bridger Bowl. Ski resorts across the country, and the forest, have a variety of policies regarding out-of-bounds skiing. As the Forest Service issues special use permits to allow for ski resorts on public land, the Forest Service should strive for consistency across ski resorts, and encourage access to public lands. Therefore, we recommend the final revised plan include a Desired Condition for an open gate policy for ski areas operating on CGNF lands as follows:

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* FW-DC-RECSKI 03: Ski areas on the forest allow skiers and snowboarders to access adjacent forest service lands through designated open gates.

Another growing use of ski resorts is uphill travel by skiers using touring gear. Ski resorts across the country have a variety of uphill travel policies.² Our members are very appreciative of the longstanding policy at Red Lodge Mountain allowing uphill travel and also appreciate the unregulated access to Bridger Bowl pre and post lift operating season. However, there is a growing constituency in the Bozeman area [ndash] including our members and organizations [ndash] that would like to see Bridger Bowl develop an uphill travel policy for the operating season. We ask that the revised forest plan include a desired condition related to uphill travel as follows:

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* FW-DC-RECSKI 04: Ski resorts operating on Forest Service lands allow for uphill access opportunities.

As we mentioned in our scoping comments, a few key areas on the CGNF stand out as priorities for the human-powered winter recreation community. We appreciate that many of these places are recognized in the draft plan and alternatives as potential recreation emphasis areas.

Trapper 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.

2 See <https://winterwildlands.org/uphill-rising/> and <http://www.ussma.org/resort-uphill-policies>

As described in the comments submitted by OAMT, we support designating this [ndash] and the greater Lionhead area [ndash] as a non-motorized backcountry area, per Alternative E. Although we support a summer ROS setting of Semi-Primitive Non-Motorized in order to allow continued mountain bike use on existing trails, the final plan should establish the winter ROS setting for this area as Primitive. There are no groomed trails or other infrastructure and it is remote with ample opportunities for solitude.

Cooke City

Cooke City has long been a destination for backcountry and cross-country skiers and in recent years this use has grown dramatically. In the past decade, two backcountry ski guiding companies have established in Cooke City and a third company also guides in the area. There are also now two backcountry accommodations geared towards skiers in the Cooke City area, one of which is located on the CGNF. It is rare to venture into the Cooke City backcountry midwinter without encountering other skiers or their tracks. We support designating Cooke City as a Winter Recreation Emphasis Area, per Alternative E, but the revised forest plan should recognize that Cooke City is more than a snowmobile destination. For example, on page 157, the text should read [ldquo]Red Lodge Mountain provides downhill skiing, and the Cooke City area is renowned for snowmobiling and backcountry skiing.[rdquo] Winter recreation in the Cooke City area is beneficial to the local economy and highly valued by skiers, snowboarders, and snowmobilers. To ensure these recreation uses are sustainably managed, the revised plan should include plan components to support a Recreation Emphasis Area designation.

As much as we value backcountry skiing and riding in Cooke City, however, we also are cognizant of the fact that this area borders Yellowstone National Park, making it an important refuge for wildlife, and that winter recreation uses may impact wildlife. Viewing wildlife enhances the backcountry experience and it is important that recreation uses don[rsquo]t conflict with or harm wildlife. Given the increase in winter use in the Cooke City area since the 1980[rsquo]s, or even since the Gallatin Travel Plan was drafted, the CGNF should carefully consider how to minimize recreation impacts to wildlife in the revised forest plan. For example, both wolf and grizzly bear populations have increased and invasive mountain goats have become firmly established in native bighorn sheep range. Furthermore, because the Cooke City area is among the highest elevation areas in the GYE, it will be a critical refuge for snow-dependent species as temperatures continue to climb and lower-elevation areas no longer hold consistent, or persistent, snow.

Because the amount and types of winter recreation in the Cooke City area have increased substantially since the Gallatin Travel Plan was drafted, it is important that the Forest Service re- consider OSV designations in this area. We recognize that Cooke City is a major snowmobile destination, but we believe a few small changes to OSV designations could reduce growing use conflict and enhance backcountry ski opportunities without negatively impacting OSV recreation.

For example, the hill side just above town, known as Town Hill, holds several easily accessible and popular ski runs but provides marginal, at best, snowmobiling. We would like to see OSV use restricted to the groomed Miller road between town and the top of Town Hill, where the road makes an approximately 90 degree turn to the north. While we recognize that forest plan revision is not the appropriate place to make site-specific changes or decisions such as this, the forest plan should recognize that there is a need to update travel management designations in the Cooke City area to reduce recreation use conflict and adapt to changing use trends.

Finally, we want to bring attention to a problem we know the Forest Service is well aware of [ndash] Wilderness trespass by OSVs. Many backcountry skiers travel to Cooke City because it is a launching point for backcountry ski tours into the Absaroka-Beartooth and North Absaroka Wilderness areas. OSV incursions into these areas, particularly the Absaroka-Beartooth, have long been a problem. These incursions negatively impact Wilderness character and the Forest Service must continue work to eliminate incursions. Another non-motorized area that suffers from frequent OSV incursions is the Irma Mine road. Although it is not common to see OSV tracks in the North Absaroka Wilderness, the upper part of the Irma Mine road is not designated for OSV use and is classified as semi-primitive non-motorized in the existing forest plan (and all alternatives in the draft plan). However, this has never been enforced and it is not uncommon to see snowmobile tracks (and snowmobiles) on the Irma Mine Road. This has increased substantially in recent years with the increase in [ldquo]hybrid skiing[rdquo] (backcountry skiers who use snowmobiles to access ski terrain) and hybrid skiers who want to save 30 minutes off of their approach to Woody Ridge and not ski the extra mile from the Cooke City dump to Irma Mine.

We suggest the following be added to section 3.7 of the final plan:

3.7 Plan Components[ndash]Cooke City Winter Recreation Emphasis Area (CWREA) Desired Conditions (AB-DC-CWREA)

- [middot] Winter recreation use does not conflict with Montana Fish Wildlife and Parks, Wyoming Game and Fish, or Yellowstone National Park wildlife management goals.
- [middot] Outfitter and guiding opportunities facilitate winter use and emphasize avalanche safety.
- [middot] The Cooke City Winter Recreation Emphasis Area provides sustainable recreational opportunities and settings that respond to increasing recreation use in concert with protecting Wilderness character in the adjacent Absaroka-Beartooth and North Absaroka Wilderness areas.
- [middot] The public is aware of and abides by over-snow vehicle restrictions. Objectives (AB-OB-CWREA)
- [middot] Revisit the Gallatin Travel Plan within 1 year of completion of the revised forest plan to adjust OSV designations with the purpose of minimizing use conflict.
- [middot] Sign non-motorized trails and boundaries of non-motorized areas where OSV incursions are likely to occur within 2 years of completion of the revised forest plan and within 1 year of updating the Gallatin Travel Plan.

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.

We support including the Bridger Winter Recreation Emphasis Area in the final plan, but due to the high level of backcountry recreation use in the Bridger Range, the Bridger Winter Recreation Emphasis Area should be expanded north to Fairy Lake. Fairy Lake is a popular recreation destination, often said to be [ldquo]the next Hyalite[rldquo] insofar as where recreation use is expected to increase as Bozeman grows. In addition, because of increased winter backcountry recreation activities and ongoing issues with enforcement of the current travel plan designations in the northern Bridgers, the revised forest plan should revise winter ROS settings in the northern Bridgers to reflect changes in suitability based on a more current understanding of use patterns, and include direction to the Forest Service to re-visit winter travel management within the Bridger Winter Recreation Emphasis Area.

We suggest the following be added to section 3.7 of the final plan:

3.7 Plan Components[ndash]Bridger Winter Recreation Emphasis Area (BWREA) Desired Conditions (BC-DC-BWREA)

[middot] The Bridger Winter Recreation Emphasis Area provides sustainable recreational opportunities and settings that respond to increasing recreation demand and changes in uses.

[middot] Vegetation management projects do not degrade or interfere with recreation opportunities. By integrating recreation into vegetation management project design, the Forest Service capitalizes on these projects to maintain or improve recreation infrastructure in accordance with the ROS setting.

[middot] OSV designations are logical and enforceable and located such that all winter users can access and enjoy the Bridger backcountry and conflict between uses is minimized.

Objectives (BC-DC-BWREA)

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* The Forest Service will initiate site-specific travel planning to update the Bridger portion of the Gallatin winter travel plan within 1 year of the completion of the forest plan revision.

* Designate two winter non-motorized backcountry areas managed to safeguard quiet, human-powered winter recreation in the northern Bridger Range: 1) between the north boundary of Bridger Bowl and the Divide of Ross Peak and the south fork of the North Fork of Bracket Creek; and 2) between the divide of Ferry Lake/Frazier Basin and the Flathead Pass Road.

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. Over the past few years we have noted a significant growth in snowmobile-assisted (hybrid) skiing on the Beartooth Pass each spring (starting around Memorial Day weekend). While this mostly occurs on the Shoshone National Forest, most users are staging from, and camping on, the Beartooth Ranger District. The vast increase in snowmobile use is causing significant conflict with human-powered skiers on the Beartooth Pass, as well as resource damage from snowmobiles being driven across the plateau on rapidly melting snow. Many human-powered skiers have simply stopped going to the Pass, frustrated by snowmobile scene. Snowmobile trailers also take up considerably more parking, leading to issues with people parking alongside the highway and not in the State Line parking area. Members of WWA and MBA have previously reported instances of snowmobile use within designated Wilderness on Line Creek Plateau

We support the Line Creek Plateau Recommended Wilderness Area designation in Alternative C. Although nobody has tried to ride a snowmobile or timbersled up the Rock Creek Headwall when somebody is skiing down it yet, it's only a matter of time before it happens if the area remains open to snowmobiles given the sharp increase in snowmobile activity occurring on the Beartooth Pass each spring. Recommending this area for Wilderness also shores up protections for this unique corner of the Beartooths. We also support expanding the Primitive ROS setting in this area per Alternative C as well.

Furthermore, we suggest that the Forest Plan include a seasonal closure for snowmobile use on the Beartooth District that aligns with the winter travel plan being developed by the Shoshone National Forest. We suggest prohibiting snowmobiles on the Beartooth District from May 16- November 14. This will eliminate use conflict with skiers on the Beartooth Pass and protect forest resources from cross-country vehicle travel when there is insufficient snow cover.

West Fork Rock Creek/Red Lodge Mountain

Backcountry skiers enjoy skiing Red Lodge Mountain in the spring and fall as well as skinning up the mountain in accordance with the Resort's uphill policy during the winter. Meanwhile, the

West Fork Road, which is groomed by volunteers from the Beartooth Recreational Trails Association (a grassroots group of Winter Wildlands Alliance), is popular with cross-country skiers and snowshoers. Cross-country skiers and snowshoers also flock to the Silver Run trail system just off the West Fork road. Given the high amount of use, and diversity of uses, that the West Fork of Rock Creek and Red Lodge Mountain receive, we support designating this area as a Recreation Emphasis Area as described in Alternative E. As per our earlier comments regarding Cooke City, however, this Recreation Emphasis Area needs specific plan components. Among other management concerns, 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. We suggest the following be added to section 3.7 of the final plan:

3.7 Plan Components— West Fork Rock Creek/Red Lodge Mountain Recreation Emphasis Area

(WFRLREA)

Desired Conditions (AB-DC- WFRLREA)

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* Winter recreation use conflicts are minimized on the West Fork Road

* Winter trail grooming is expanded to improve opportunities for non-motorized winter recreation and accommodate increased use.

Objectives (AB-OB- WFRLREA)

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* Initiate winter travel management planning on the Beartooth Ranger District within 1 year of completion of the forest plan revision.

Suitability (AB-SUIT- WFRLREA)

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* Over-snow vehicle (as defined by the Travel Management Rule), fat tire bicycle, and foot traffic (including skiing) are suitable on the groomed West Fork Road. Other uses are not suitable during the grooming season.

* The West Fork Road is suitable for trail grooming.

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, in addition to Chico Peak, 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.

We, along with our OAMT partners, support a Recommended Wilderness designation for the Chico Peak and Emigrant Peak roadless backcountry on the west side of the Absaroka mountain range. We recommend that the final plan include a modified version of the Chico and Emigrant Recommended Wilderness included in Alternative D. Our recommendation includes the two inventoried roadless areas (Chico and Emigrant) as marked on the map for Alternative D (Appendix A, pg. 44) as well as surrounding roadless lands that were not included in the RARE II

mapping (see figure 1 below). A corridor for the existing two-track road and for a future connecting trail between

Emigrant Gulch and Arrastra Creek is intentionally left out of our Recommended Wilderness for Chico Peak and Emigrant to account for future mechanized recreation opportunities.

Figure 1: Proposed Chico-Emigrant Recommended Wilderness

Emigrant Peak and Chico Peak offer world-class backcountry skiing opportunities that are only a 30-minute drive from Livingston. While significantly quiet compared to backcountry skiing locations like Hyalite Canyon, Beehive Basin and the northern Bridger Range, the Emigrant Gulch area has grown in recreation popularity in the past decade. Part of the growth in backcountry skiing interest here was due to the threat of a gold mine from Lucky Minerals and the desire for skiers to protect the landscape by bringing local, regional and national attention to its

outstanding scenery, wildness, and alpine skiing terrain. According to Thomas Turiano's Select Peaks of the Greater Yellowstone, the first ski descent of Emigrant dates back to the 1950's with Dave Wessel skiing off the north summit (Peak 10,567). Legendary skiers Tom Jungst and Jim Conway skied off the true summit in 1983. Now, on a weekend with stable snowpack in February, March or April it is possible to find six or more parties enjoying different aspects of Emigrant Peak. Nevertheless, due to its massif-geology with three distinct bowls and roughly a dozen couloirs both short and long, solitude and wildness is easy to come by. Chico Peak

continues to be Emigrant's quieter neighbor in terms of recreation traffic but yields the same

high-quality ski terrain with open bowls, faces and couloirs. Both areas are used by our members, supporters, and staff.

Members of the Montana Backcountry Alliance and Southwest Montana Mountain Bike Association (both Outdoor Alliance Montana members) worked together in 2018 to reach agreement on recommended wilderness management for the aforementioned roadless areas (Chico and Emigrant). Both groups agreed that there is no current mechanized trail use in the area and all motorized use is restrained to the road systems in the center of Emigrant Gulch and Arrastra Creek. This agreement came out of vetting the discussion with avid mountain bikers and backcountry hunters in the Livingston and Paradise Valley community [ndash] none of which ride mountain bikes within the roadless areas or along trails accessing existing wilderness boundaries such as Six Mile Creek. Both groups also agreed that the exceptional wildlife values in Chico Peak and Emigrant Peak roadless areas associated with wolverine, elk and grizzly bear appropriately elevate these landscapes to recommended wilderness. All three species have been observed with regularity across both roadless areas.

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.

As members of the Gallatin Forest Partnership, we endorse the GFP Agreement's recommendations for Hyalite Canyon and ask that they be fully incorporated into the revised forest plan. As skiers, keeping the high peaks of Hyalite wild, without new trails, and non-motorized is incredibly important. Unfortunately, we frequently come across snowmobile tracks on Hyalite Peak and in Shower Creek basin. These incursions typically come from Storm Castle Creek, where OSVs are allowed (although it is not allowed in the upper reaches of Storm Castle Creek either). It is clear that there needs to be more enforcement presence to discourage disrespectful OSV users (which are a small minority of OSV users) who violate the travel plan.

We are glad to see that one of the objectives in the draft plan is FW-OBJ-ROSSPNM, [idquo]eliminate five existing unauthorized motorized travel incursions per decade.[rdquo] We are hopeful that this may be one of the areas where the CGNF works to eliminate unauthorized motorized travel incursions in the future.

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. We are glad to see that this area would remain non-motorized in winter under all of the alternatives.

Beehive and Bear Basins.

This is one of the few Wilderness areas where you can find high quality backcountry skiing opportunities with a relatively 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. This may also be a place where the Forest Service will need to consider options for managing to maintain opportunities for solitude if use continues to increase.

Rendezvous Ski Trails.

This Nordic trail system draws skiers from near and far. It is an important and positive element of West Yellowstone's winter economy and we are supportive of the Hebgen Winter Recreation Emphasis Area in Alternative E. We are glad to see that the draft plan includes plan components (3.7.15, on pages 185-186 of the draft plan) to provide specific direction for managing this winter recreation emphasis area. We ask that the Hebgen Winter Recreation Emphasis Area and associated plan components be incorporated into the final plan.

Winter Travel Management

In 2015 the Forest Service revised its travel management regulations to require that all national forests that receive sufficient snow to support winter recreation write over-snow vehicle travel management plans. Following planning, forests must publish an over-snow vehicle use map (OSVUM) showing where OSV use designations, with OSV use prohibited outside of designated areas and trails. The Gallatin National Forest was ahead of its time when it included OSV designations the 2006 Gallatin Travel Plan. Most of these designations have stood the test of time despite a significant increase the number of people participating in backcountry winter recreation and substantial changes in OSV and ski technology. However, there are some places on the Gallatin National Forest

[ndash] most notably the Bridger Mountains and Cooke City area [ndash] where use conflict is on the rise and/or OSV incursions into non-motorized areas are a persistent problem. After 13 years it[rsquo]s time to revisit the Gallatin Travel Plan and make some small adjustments. Meanwhile, there is no winter travel plan for what was formerly the Custer National Forest. Following forest plan revision, the CGNF must do winter travel planning to designate specific routes and areas for OSV use within areas deemed suitable for winter motorized use (per the winter ROS in the revised forest plan) on the Beartooth, Ashland, and Sioux Ranger Districts

In our scoping comments we discussed several opportunities within forest planning to provide forest wide direction relevant to winter travel management and asked that the Forest Service consider these options. These included establishing season dates for OSV use, establishing a forest-wide minimum snow depth, and the winter Recreation Opportunity Spectrum. We are disappointed to see that the majority of our comments on this topic were ignored and not addressed in the draft plan or DEIS. Forest plans are intended to provide programmatic direction to guide future site-specific decision making. The CGNF must undertake winter travel planning on 3 ranger districts, and should make some revisions to the 13-year-old winter travel plan that guides OSV management on the rest of the forest and having good forest-wide direction in the revised forest plan will help in these future planning efforts. Including a winter ROS is important programmatic direction and we[rsquo]re glad to see it in the draft plan, but minimum snow depth and season dates are also useful tools for managing OSV use.

For example, in pages 7-9 of our scoping comments we asked that the Forest Service consider instituting a forest-wide minimum snow depth for OSV use. We provided justification for this request based on Forest Service Best Management Practices and examples from other National Forests. Not only did the CGNF not consider minimum snow depth as a tool for managing OSV use in any of the alternatives, the DEIS also gives no explanation as to why it was not considered nor does it even mention that such an idea was raised in scoping. As described in the Final Assessment, Final Climate Report, temperatures across the forest are expected to rise significantly over the life of the revised plan and precipitation is expected to shift from snow to rain. These changes will impact where and when people engage in winter recreation on the forest. Low elevation areas that currently support over-snow recreation may not consistently support these uses in the future. Certain trailheads may no longer provide access to snow for OSV recreation. Already, in the spring and fall, it is not uncommon to see people riding snowmobiles across bare ground [ndash] on and off road [ndash] to access higher elevation snow. A minimum snow depth helps the Forest Service minimize impacts to soils and vegetation [ndash] a key requirement of the Travel Management Rule. Several National Forests in California are considering, or have implemented, a 12-inch minimum snow depth, as has the Chugach National Forest in Alaska.

Likewise, on page 7 of our scoping comments we suggested that the revised forest plan should include season dates for when OSV travel is allowed on the forest. We suggested that season dates differ by geographic area and that they align with season dates on neighboring forests. The Beaverhead-Deerlodge forest plan allows OSV use from December 1 to May 15. Likewise, the Shoshone National Forest is considering implementing a late April or early May end date for OSV use in their Travel Management Plan. As we already mentioned in these comments, we believe a seasonal restriction for snowmobile use on the Beartooth District is necessary to protect opportunities for human-powered spring skiing and protect forest resources. Season

dates help to minimize impacts to wildlife and natural resources. They also help to minimize conflict between uses, including different motorized uses, by clearly differentiating when the OSVUM, versus MVUM, is applicable. The Gallatin Travel Plan includes seasonal OSV restrictions for some areas, which we support. The revised forest plan should build off of these restrictions to set season dates for OSV use across the CGNF.

We appreciate that the draft plan includes winter ROS settings for all alternatives. It is critical that the forest plan use the ROS to identify the suitability of various forest lands for motorized use. This is markedly different from designating areas (or routes) for motorized use, which occurs during a subsequent site-specific process. However, describing and mapping suitability is an essential foundation for future site-specific decisions. Connecting suitability with the ROS maps indicates that motorized use may be appropriate but does not make a specific commitment to authorize the use. However, where lands are identified as not suitable for motorized use, then it may not be authorized in subsequent travel planning.

The winter ROS map should outline the desired winter ROS and suitability for where motorized uses may be designated, rather than a reflection of current conditions. As described in the Forest Service Handbook, integrated planning should form the basis for the desired ROS settings.³ Integrated planning should identify, for example, where in the landscape motorized recreation is a [ldquo]stressor[rdquo] to other resource values (like non-motorized recreation, wildlife, meadows, etc.). Identification and allocation of desired recreation settings should not be done after other resource allocations are made. This has occurred on many forests in the past and resulted in the subordination of recreation settings to other resource allocations.⁴

Instead, the winter ROS map should be forward looking and provide guidance on how the CGNF hopes to manage winter recreation in the future. Although forthcoming winter travel planning on the Beartooth, Ashland, and Sioux Ranger Districts and updates to the Gallatin Travel Plan will make site-specific designations, the CGNF must make broad suitability decisions, and changes, during forest planning that reflect an integrated planning process in which recreation is part and parcel of social, economic, and ecological sustainability.

³ [ldquo]At the forest scale, sustainable recreation is derived through the integrated planning process and emerges as the resultant set of desired recreation opportunity spectrum classes.[rdquo] FSH 1909.12, ch. 20 [sect] 23.23(a)(1)(d)

⁴ In previous rounds of forest planning, ROS settings were generally by-products of resource allocations or

merely represented existing uses. For example, zones where vegetation management or commercial logging were allowed were[mdash]by default[mdash]assigned motorized ROS settings. As another example, zones where motorized use historically occurred were similarly assigned motorized ROS settings. The Inyo should not treat the ROS under the 2012 Rule the same as under the 1983 Rule.

In addition to addressing motorized suitability, the winter ROS should consider and address glading of timbered areas to improve opportunities for non-motorized winter recreation. This is an innovative way to integrate fire and fuels management, vegetation management, and recreation. National Forests in Vermont and New Hampshire have begun working with the backcountry ski community to integrate vegetation management with recreation in this manner. Removing downfall and ladder fuels can improve recreation opportunities by increasing skiable acreage, directing use to or away from specific areas, and easing overcrowding. It can also reduce fuel loads and improve forest health, thus meeting vegetation, fire, and fuels management goals. As with the glading projects the Forest Service is working on in New England, any glading done to enhance backcountry skiing on the CGNF could, and should, be done in partnership with groups such as Montana Backcountry Alliance or Beartooth Recreational Trails Association. Glading should not be suitable in Primitive or Semi-Primitive Non-Motorized areas but the Forest Service should consider where within Semi-Primitive Motorized, Roaded Natural, or Rural ROS settings glading may be suitable.

We are glad to see that the winter ROS maps vary by alternative and do not simply reflect the status quo as the ROS maps did in the Proposed Action. However, it appears that there are still many areas across the forest where the CGNF has relied too heavily on the existing condition to determine suitability rather than to consider the desired future condition for an area. For example, alternatives A, B, C, and E all designate almost the entirety of the west side of the Bridgers as semi-primitive motorized. While it[rsquo]s true that the west side of the Bridgers are currently designated for OSV use under the Gallatin Travel Plan, we do not believe the entire west side of the Bridgers is suitable for OSV use and this is an area where we feel the Gallatin Travel Plan should be updated. Snowmobiling rarely, if ever, occurs on any of the heavily used trails on the west side of the Bridgers. One reason is that the lower reaches of Sypes Canyon, Truman Gulch, Middle Cottonwood and other areas rarely have enough snow to ride a snowmobile on the trail without hitting rocks, much less cross-country. These trails are popular with hikers year-round, and snowshoers in the winter. OSV use is neither physically or socially suitable on the west side of the Bridgers and the winter ROS map in the final plan should show that this area is semi-primitive non-motorized.

Likewise, the winter ROS maps for the Cooke City area don[rsquo]t appear to reflect serious consideration of OSV suitability for CGNF lands south of Highway 212. All alternatives mark all CGNF lands east of Republic Creek as suitable for OSVs [ndash] either semi-primitive motorized or rural. In reality, however, Woody Creek and the CGNF portions of Woody Ridge and Ram Pasture Mountain are not suitable for OSVs. Not only is much of this area steep and wooded terrain that OSVs can[rsquo]t access, this entire zone has become incredibly popular with backcountry skiers. The Woody Creek Cabin, which did not exist when the Gallatin Travel Plan was written, draws skiers to the south side of Highway 212. Because of the Woody Creek Cabin, everything from Ram Pasture to Republic Mountain sees far more ski use than it ever has before. It is not a stretch to

say that there are skiers in this area every day of the winter. Motorized use is currently prohibited on the Woody Creek trail but if this were to change based on the forest plan deeming Woody Creek and surrounding terrain

suitable for OSVs this would cause substantial conflict with backcountry skiing, cross-country skiing, and snowshoeing. In addition, Ram Pasture provides critical winter range for bighorn sheep and is therefore not suitable for OSV use.

The CGNF website includes 9 maps highlighting OSV designations in the areas where 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. At the very least, those parts of the West Yellowstone, Bozeman, and Yellowstone Ranger Districts that are not included on one of these 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 OSV trails, or designated OSV trails.

The CGNF is lucky to the Gallatin National Forest Avalanche Center [ndash] the GNFAC staff are very knowledgeable about where OSV use occurs across the forest as well as snow conditions across the forest. These staff should advise the forest planning staff on where OSV use is suitable and help the forest plan revision team determine the desired future condition insofar as winter ROS settings are concerned.

ROS settings

We are pleased to see that the draft plan includes details describing winter (and summer)- specific settings, character, and suitability for each of the ROS classifications. We support most of what is currently in the draft plan in this regard. Where plan components regarding the ROS vary by alternative, we support the plan components associated with Alternative C. However, we have noticed a couple of discrepancies in the language describing the ROS.

On page 685 of the DEIS it states [ldquo]For winter recreation opportunity spectrum in all revised plan alternatives, groomed cross-country ski trails are mapped as semi-primitive nonmotorized.[rdquo] This conflicts with the desired condition for winter semi-primitive non-motorized settings, FW-DC-

ROS 06, as stated on page 96 of the draft plan, which states [ldquo]trails are generally un-groomed and not marked for winter travel.[rdquo] Not only do groomed cross-country ski trails exist across a variety of ROS settings, it is inconsistent to say that groomed cross-country ski trails are mapped as semi-primitive non-motorized but that trails in semi-primitive non-motorized settings are generally un-groomed. Furthermore, many ungroomed, semi-primitive, cross-country ski trails on the forest are marked for winter travel with the small square sign depicting a cross-country skier or are marked on a map (such as the Hyalite Winter Recreation Map). We suggest removing the sentence on page 685 of the DEIS and making the following change in the draft plan:

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* FW-DC-ROS 06: Semi-primitive nonmotorized settings (winter) provide backcountry and Nordic skiing, snowboarding, and snowshoeing opportunities. Trails are generally un-groomed but may be marked for winter travel. Some areas that have enough compaction may see fat tire bike use. Rustic facilities, such as historic

cabins and yurts may exist but are rare.

The revised forest plan should clarify that ROS suitability is not the same as a travel management designation, and that site-specific travel planning in compliance with the Travel Management Rule is required to designate routes and areas for motorized use. The revised plan should also set a timeline for when this site-specific travel planning will occur. We suggest the following modifications and additions in the final plan:

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* FW-SUIT-ROSSPM 01: Motorized use is suitable on designated routes and, for over-snow vehicles, in designated areas in semi-primitive motorized settings.

* FW-SUIT-ROSRN 01: Motorized recreation travel is suitable on designated routes and, for over-snow vehicles, in designated areas within roaded natural settings.

* FW-OBJ-REC 02: Initiate site-specific winter travel planning in compliance with the Travel Management Rule on the Beartooth, Ashland, and Sioux Ranger Districts within 1 year of completion of the revised forest plan.

* FW-OBJ-REC 03: Initiate site-specific travel planning to update the Gallatin Travel Plan to reflect changes in motorized suitability, and where public comment has demonstrated that updates are needed, within 1 year of completion of the revised forest plan.

Finally, we request that the Forest Service apply a Primitive Winter ROS setting to the Crazy Mountain Backcountry Area. If the Crazy Mountain Backcountry Area is not designated in the final plan, then the Primitive Winter ROS setting should be applied to all roadless lands in the Crazies. The Crazies are cherished by backcountry skiers seeing [ldquo]the snow less traveled[rdquo] and hold high cultural significance for the Crow tribe. A Primitive Winter ROS setting for the roadless heart of the Crazy Mountains will help to protect the remote, undeveloped character of the range and the experiences these mountains provide.

Recommended Wilderness

We support the recommended wilderness designations in Alternative C with three modifications:

1. designate the Dome Mountain RWA as mapped in Alternative D, 2) designate the Chico and Emigrant RWAs as described earlier in these comments, and 3) designate the Lionhead as a non-motorized backcountry area. The comments we have submitted with Outdoor Alliance Montana and the Gallatin Forest Partnership detail why we are supportive of these recommendations.

In order to protect the wilderness character, non-conforming recreation uses are not suitable within recommended wilderness. We urge the CGNF to adopt FW-SUIT-RWA 02 as described for

Alternative C into the final plan. Allowing non-conforming recreation uses in recommended wilderness areas is a

recipe for conflict and decades of disagreement. All one needs to do to confirm this fact is to look to any forest where non-conforming recreation uses have been allowed in recommended wilderness areas, and the fights that ensue when the forest does travel management or stakeholders and elected officials consider crafting a Wilderness bill. By deeming recommended wilderness not suitable for non-conforming recreation uses the CGNF will save the public, and the next generation, from fights, headaches, and heartache.

Wildlife

The Custer Gallatin provides habitat for lynx and wolverine - two species which are closely associated with snow. As skiers, we hold a special affinity for these species and do our best to stay attuned to the latest research concerning the impact of winter recreation on these species. In recent years Forest Service biologists and other researchers have completed in-depth studies on how lynx and wolverine are affected by winter recreation use.

A recent study in Colorado, conducted by Forest Service biologists, examined impacts of winter recreation on lynx.⁵ The study found that lynx do not appear to be as sensitive to low or moderate levels of backcountry recreation as previously thought and are fairly tolerant of non- motorized backcountry recreation. The study did find, however, that there appears to be a disturbance threshold (associated with ski resorts) above which lynx are displaced from habitat. Other studies have examined how snow compaction from winter recreation [ndash] specifically snowmobiles [ndash] alters competition dynamics between lynx and coyotes.⁶ This information should help to inform the forest plan. We are disappointed that the draft plan only contains a single plan component related to lynx (W-DC-WLLX 01) and that the draft plan does not integrate winter recreation management and lynx habitat management. The recently revised Flathead National Forest plan included several guidelines in the General Recreation section intended to meet the 2012 Planning Rule's requirements for integration.⁷ We recommend the CGNF plan include a guideline integrating lynx habitat and recreation management, similar to what is in the revised Flathead plan for forest-wide direction for recreation:

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* FW-GDL-REC 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

5 Rocky Mountain Research Station, Science You Can Use Bulletin. January/February 2019. Issue 33. Available at <https://www.fs.fed.us/rmrs/winter-sports-and-wildlife-can-canada-lynx-and-winter-recreation-share-same-slope>

6 See for example, Buskirk, S.W., L.F. Ruggiero, C.J. Krebs. 2000. Habitat fragmentation and interspecific competition: implications for lynx conservation. Pages 83-100 in Ruggiero, L.F., K.B Aubry, S.W. Buskirk, et al. Ecology and conservation of lynx in the contiguous United States. University Press of Colorado, Boulder, Colorado and Bunnell, K.D., J.T. Flinders, and M.L. Wolfe. 2006. Potential impacts of coyotes and snowmobiles on lynx conservation in the Intermountain West. Wildlife Society Bulletin 34:828-838.

7 See Flathead Forest Plan, Chapter 2, page 61.

motorized over-snow vehicle use, groomed routes, or areas where motorized over-snow vehicle use is identified as suitable.

The Flathead plan also contains a similar guideline related to wolverine, which we suggest the CGNF include in the final plan as follows:

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

Researchers recently completed a study of winter recreation and wolverines, similar to the lynx study in Colorado.⁸ The winter recreation/wolverine study was conducted in Idaho, Montana, and Wyoming. The study demonstrated that wolverines are sensitive to winter recreation, with sensitivity increasing alongside the intensity of recreation use. Female wolverines in particular, experience functional habitat loss in response to high levels of snowmobiling or backcountry skiing. The researchers found that female wolverines were more strongly affected by snowmobile use [ndash] they exhibited a stronger avoidance and experienced more indirect habitat loss [ndash] than males. And, the study concluded that backcountry winter recreation could become more of a stressor for wolverines as the climate warms and snowpacks shrink, concentrating both wolverines and recreationists into smaller areas. Having frequently come across wolverine tracks while skiing on the CGNF, we know this is an important forest for wolverines. We appreciate that the draft plan contains a desired condition and a guideline related to wolverine habitat management. However, we believe the Flathead's guidance should also be adopted into the CGNF plan as suggested above.

In order to further protect wolverines, we ask the Forest Service to demarcate "Voluntary Humility Zones" (VHZ's) related to winter recreation and occupied wolverine dens in the revised plan. The previously cited 2019 report on wolverine sensitivity to winter recreation makes it clear that all forms of winter recreation have impacts to female denning wolverines. Similar to the voluntary winter range closures on the Bridger Teton National Forest for elk, the CGNF should create a precedent for voluntary closures (February - April) related to denning wolverine sites. MBA and WWA and other NGO partners could help with signage at trailheads (posted year-round) to educate recreation visitors about the sensitivity of traveling in wolverine habitat during denning times and recommend that recreation users voluntarily refrain from winter recreation in specific high cirques and alpine basins during wolverine denning season.

8 Heinemeyer, K., J. Squires, M. Hebblewhite, J. J. O[rsquo]Keefe, J. D. Holbrook, and J. Copeland. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. *Ecosphere* 10(2):e02611. 10.1002/ecs2.2611. Available at <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.2611>

A final wildlife concern that we would like to raise is related to grizzly bear spring den emergence. We appreciate that the Gallatin National Forest considered grizzly bear denning habitat when making OSV use designations for the 2006 Gallatin Travel Plan. However, spring OSV use and grizzly bear populations have both increased substantially since 2006. Grizzly bear cubs are not particularly mobile when they first emerge from the den and OSV use can cause significant impacts to bears if a sow is displaced by disturbance and abandons her cub(s). We encourage the Forest Service to take a fresh look at late-season OSV use in grizzly bear habitat and re-consider whether any changes are needed, particularly regarding season end dates. We did not see this particular issue discussed in the DEIS.

Finally, as backcountry skiers and snowboarders, we are extremely appreciative of the services offered by the Gallatin National Forest Avalanche Center. The GNFAC is an invaluable resource for winter backcountry enthusiasts. As winter recreation grows across the CGNF the Forest Service should consider expanding the reach of the GNFAC to cover the Beartooth Ranger District in addition to the former Gallatin National Forest. We recommend adding a Desired Condition to the revised forest plan along the lines of:

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* FW-DC-RECED 08: The Gallatin National Forest Avalanche Center expands to meet a growing need on the eastern portion of the Forest, and is re-named the Custer Gallatin National Forest Avalanche Center.

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