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Title:

Comments: Thank you for the opportunity to comment on the draft Environmental Impact Statement (DEIS) for the Custer Gallatin forest plan revision. The attached comments are submitted on behalf of Outdoor Alliance and Outdoor Alliance Montana, a coalition of national and Montana-based advocacy organizations that includes Southwest Montana Climbers Coalition, Montana Backcountry Alliance, Southwest Montana Mountain Bike Association, Western Montana Climbers Coalition, Mountain Bike Missoula, Winter Wildlands Alliance, International Mountain Bicycling Association, American Whitewater, and the American Alpine Club.

Thank you,

Hilary Eisen

Thank you for the opportunity to comment on the draft Environmental Impact Statement (DEIS) for the Custer Gallatin forest plan revision. These comments are submitted on behalf of Outdoor Alliance and Outdoor Alliance Montana, a coalition of national and Montana-based advocacy organizations that includes Southwest Montana Climbers Coalition, Montana Backcountry Alliance, Southwest Montana Mountain Bike Association, Western Montana Climbers Coalition, Mountain Bike Missoula, Winter Wildlands Alliance, International Mountain Bicycling Association, American Whitewater, and the American Alpine Club. Our members visit the Custer Gallatin National Forest (CGNF) to hike, mountain bike, fat-tire bike, paddle, climb, backcountry ski, cross-country ski, and snowshoe.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

A series of new economic studies, commissioned by Outdoor Alliance, measured the economic impact of outdoor recreation in the region. Researchers found that outdoor recreation in the Custer Gallatin National Forest generates \$223.1 million in annual spending on paddling, climbing, hiking, snowsports, and mountain biking [mdash] while also supporting local jobs and attracting both businesses and residents to south central

Montana.<sup>1</sup> This is a significant contribution to our local economy and through the forest plan revision the CGNF has an opportunity to support and enhance outdoor recreation opportunities while protecting the unique values of

this forest that make it such an important place for so many people.

The CGNF is important to the outdoor recreation community because it offers world-class ice climbing, is a national draw for backcountry skiing, mountaineering, backpacking, and paddling, and provides regionally significant rock climbing and mountain biking opportunities. While the physical resources [ndash] terrain, ice, snow, rock, and rivers [ndash] are critical to these experiences and protecting their quality and access to them is important, what makes outdoor recreation on the CGNF truly unique, and why it stands out above so many other places, is the sense of adventure that comes from recreating in a wild landscape where the full suite of native wildlife still roam. The CGNF is in the heart of the Greater Yellowstone Ecosystem and much of the forest is Wilderness or roadless. It[rsquo]s easy to find solitude and much of the forest hasn[rsquo]t substantially changed in hundreds of years. Recreating in this wild landscape brings a sense of adventure and exploration that is increasingly rare in today[rsquo]s world.

Outdoor recreation in a wild setting like the CGNF is special, and protecting its wildness is important to our constituency. Biking past a tree marked by grizzly claws, skiing alongside wolverine tracks, spying mountain goats while ice climbing, or paddling an unimpeded stream full of wild trout are cherished experiences that outdoor recreationists value. At the same time, we recognize that the communities surrounding the CGNF [ndash] especially Bozeman [ndash] are growing rapidly and that there is a corresponding increase in recreation activities on the forest. This growth, along with impacts from climate change, are the two biggest issues the Forest Service must contend with in the forest plan revision. The 2012 Planning Rule, in particular sections 219.8 (sustainability) and 219.10(a)(1), (5), and (8) (integrated resource management), is an excellent opportunity for the CGNF to tackle these thorny issues. A proactive management plan that thoughtfully considers what recreation uses, and levels of use, are appropriate in various parts of the forest and across seasons, integrates recreation into all other aspects of forest management and materially protects both wild landscapes and wildlife habitat needs can ensure that future generations of outdoor recreationists can experience the same sense of adventure and exploration as they climb, ski, hike, bike, and paddle on the Custer Gallatin as we do today.

In 2018, the member organizations comprised by OAMT worked together to develop a vision for the Custer-Gallatin. We shared this vision with you in December 2018 and were excited to compare it with the DEIS following its publication in March 2019.

1 Maples and Bradley 2018. The Economic Influence of Outdoor Recreation in Montana[rsquo]s Custer Gallatin National Forest. Available online at <https://www.outdooralliance.org/custer-gallatin-economic-reports/?rq=economic>

Knowing that we did not share the OAMT vision with the Forest Service early enough to have it included in any of the Alternatives, we are pleased to find that much of what we envision for the forest is reflected in Alternative C,

with some key modifications. In these comments we will describe our vision for the forest and how it aligns with elements of the DEIS, as well as our broader thoughts on how the draft plan addresses sustainable recreation.

#### I. Sustainable Recreation Management and Integration

The CGNF is a large and diverse forest that provides a myriad of types of recreation opportunities, the gist of which are nicely captured by the two niche statements on pages 93 and 94 of the draft plan. While we agree that the forest is home to both [ldquo]world class wildland adventures[rdquo] and [ldquo]uncommon landscapes[rdquo] the revised forest plan should include a niche statement that describes the forest as a cohesive unit. The draft plan provides a good starting point for sustainable recreation management but it can be improved. Most importantly, we would like to see more detailed direction for how the forest will achieve its stated desired conditions. Forest plan standards, objectives, and guidelines should provide a road map for getting from the current condition to the desired future condition.

Throughout the Forest Plan, identified objectives should be more specific than they are in this draft. There are many objectives in the draft plan stating that a certain number of projects will be completed to achieve some level of resource protection or improve visitor experience and management, but there are no details guiding where those projects should take place. For example, on page 40 of the draft plan FW-OBJ-VEGF 01 reads [ldquo]Implement [number varies by alternative] forested vegetation management projects per decade with explicit primary or secondary purposes of benefitting wildlife, whitebark pine and other at-risk species habitat, pollinator habitat, non-commercial vegetation, and general terrestrial ecosystem conditions.[rdquo] While this and other similar objectives are commendable, the CGNF should include specific geographic areas or other identifying features to ensure these projects are implemented where they are most needed. Furthermore, it[rsquo]s not clear how, or why, the Forest Service arrived at the number of projects it hopes to implement in each alternative.

While we understand that forest plans cannot be overly prescriptive, if left too vague the plan will not provide the direction necessary to achieve its vision. Furthermore, detailed programmatic direction, backed by robust analysis, can pay dividends down the road by reducing the analytical burden associated with project-level planning, from travel management to trail construction. In addition, the Forest Service will be much more successful in implementing this forest plan if it seeks out and works with user groups in

a productive and collaborative manner. While we very much appreciate that the CGNF has developed a dispersed recreation goal specific to working with the climbing community (FW-DC RECDISP 01: [ldquo]The forest engages with the rock and ice climbing community to develop site-specific solutions to evolving issues with placement of permanent bolting route, designation of approach routes, and timing restrictions for wildlife protection.[rdquo])), we would like to see similar goals developed for other recreation user groups.

#### General Recreation

Considering how important the CGNF[rsquo]s wildlands and the wildlife they support are to enhancing the recreation experience on the forest, the final plan should include an additional desired conditions focused on maintaining these values. Additionally, there should be a desired condition intended to ensure that the revised forest plan proactively integrates recreation management with other forest management activities. We recommend the following additional desired conditions for FW-DC-REC:

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\* Recreation settings retain their natural character and continue to contribute to a sense of adventure for visitors as development and populations in the region continue to grow and new forms of recreation emerge.

\* Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.

\* Visitation and recreation activities do not significantly diminish wildlife habitat values or significantly negatively impact wildlife populations.

While the forest-wide desired conditions related to sustainable recreation for the draft plans set worthy goals, and while we understand that long-range plans cannot dive too deeply into tactical prescriptions, there is little in the plans that specifically describes what steps the Forest Service will take to achieve these desired conditions. In order to be effective, Desired Conditions must be supported with other required plan components, including specific standards and guidelines. Without a full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path towards achieving the desired conditions. For example, while it appears that FW-OBJ-REC 01 relates at least partially to FW-DC-REC 05, there are no objectives relating to any other desired conditions. And, while we are supportive of a recreation objective directed at protecting riparian management zones, and we can think of several examples of recreation facilities, including dispersed sites, that should be removed or relocated out of riparian management zones or otherwise addressed to improve aquatic and riparian

resources, it is not clear how the Forest Service arrived at the number (5, 7, 2) of such sites that should be addressed over the life of the plan in each Alternative per FW-OBJ- REC 01. While 5 seems like a nice middle-ground number, and we are generally supportive of Alternative C, the Forest Service should better explain the rationale for aiming to address 5 sites, versus 7, 2, or some other number.

Similarly, the final plan should include more than one suitability standard related to recreation management. The CGNF supports a multitude of recreation uses, and while it is important to address pack goats, we suggest the following FW-SUIT-REC plan components:

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\* Foot travel, including skiing, is suitable for cross-country travel unless area is administratively closed to public access.

\* Non-motorized boating, wading, and swimming is suitable on all water bodies, rivers, and stream reaches, unless area is administratively closed to public access.

\* Rock climbing is a suitable wilderness and non-wilderness activity, as is the conditional use of fixed climbing anchors as appropriate.

The final plan should also include standards related to recreation, as standards are the only plan components that the Forest Service must (versus should) adhere to. We suggest the following FW-STAND-REC plan

components:

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\* Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.

\* Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.

\* Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.

\* When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.

We understand the need for certain areas of National Forest lands to be closed temporarily, or in rare occasions, on a permanent basis. Typically, the need for closure is due to safety or ecological issues that cannot be mitigated. In the instances above where we outline a condition or standard [ldquo]unless the area is administratively closed to public access,[rdquo] we recommend that anytime the USFS contemplates a new closure, the agency consult with stakeholders who have a particular interest in the area that is being

considered for closure. Furthermore, if a trail or area is closed to protect wildlife, the closure should be applied to all recreational uses unless there is a specific reason to restrict only certain uses. We also recommend that the agency review all closures on a periodic basis to determine whether they continue to be appropriate.

#### Recreation Opportunity Spectrum

The Forest Service is required to use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes, and the ROS is the best tool the Forest Service has for forest-scale planning.<sup>2</sup> The Planning Rule requires that a plan [ldquo]must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses,[rdquo] including outdoor recreation.<sup>3</sup> Likewise, the 2012 Planning Rule states that plans [ldquo]must include plan components, including standards or guidelines, to provide for sustainable recreation,[rdquo] including [ldquo][s]pecific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.[rdquo]<sup>4</sup> We appreciate that pages 95-101 of the draft plan include plan components outlining the desired conditions, standards, guidelines, and objectives for the ROS as well as for each ROS setting, for both summer and winter.

On page 685 of the FEIS the Forest Service explains how the ROS serves to set clear expectations of recreation settings and uses across the forest, and that this helps in managing both existing and emerging recreation uses. We wholeheartedly agree, and this is one reason that we believe that is important for the ROS section of the Forest Plan to clearly state what level of infrastructure development, types of uses, and overall setting the public should expect within each ROS class. We are mostly supportive of the plan components, and the specific components associated with Alternative C, that the CGNF has developed. However, as with our earlier point about objectives, the CGNF should provide an explanation to support the objectives for each ROS setting for each alternative insofar as how many incursions will be reduced, signs posted, etc. For example, while we support the objective of eliminating unauthorized motorized travel incursions into semi-primitive non-motorized

areas, the FEIS does not provide the information necessary to determine whether 5 is a reasonable, or adequate, number of incursions to eliminate in a decade. Without more information, we are inclined to think that the Forest Service could, and should, eliminate more than 5 existing but

2 FSH 1909.12

3 36 C.F.R. [sect] 219.10(a)

4 FSH 1909.12, ch. 20, [sect] 23.23a(2)(g)

unauthorized motorized travel incursions into semi-primitive non-motorized areas within a decade.

The final EIS and final plan should clearly state that ROS settings do not preclude travel planning decisions. The final plans should explain that site-specific travel planning is needed to determine where within semi-primitive motorized, roaded natural, and rural areas motor vehicle use will be allowed. This is particularly pertinent to winter ROS settings and over-snow vehicle (OSV) travel management, as the Forest Service has historically conflated [ldquo]suitable[rdquo] with [ldquo]designated[rdquo] when considering areas where OSV use is allowed. Any changes to motorized suitability (particularly if new areas are found suitable) within the part of the forest covered by the Gallatin Travel Plan should be followed by site-specific travel planning to designate specific areas or trails within areas that are suitable for motorized use. Also, because the Custer portion of the CGNF does not currently have an OSV travel plan, when the Forest Service undertakes OSV travel planning for the parts of the forest not covered by the Gallatin Travel Plan, it cannot simply designate all areas that are suitable for winter motorized use. The winter ROS is a starting point, identifying zones of suitability, within which the Forest Service must make specific travel management designations. Chapter 10 [sect] 11.2 of the revised Travel Management Planning directives state [ldquo]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.[rdquo] Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. [sect] 261.14. Given that application of the minimization criteria is not part of the process wherein ROS classifications are assigned, ROS classifications cannot serve a dual purpose as OSV area designations. Furthermore, the final plan should articulate, via standards associated with semi- primitive motorized, roaded natural, and rural settings that motorized route and area designations comply with the Travel Management Rule.

Emerging Recreational Technologies

We appreciate that the Forest Service is looking ahead in this planning process and recognizing that new recreational technologies will emerge over the life of the plan. While we cannot always predict what these will be, having language in the plan to guide how the Forest Service will manage future uses will be helpful. Along with wholly new technologies, there will be cases where emerging recreational technologies fit within an existing classification. For example, OAMT believes that electric bikes (mountain or otherwise), since they have motors, should be classified as motor vehicles. Therefore, e-bikes are suitable on designated motorized routes and trails located within semi-

primitive motorized, roaded natural, and rural ROS settings. We suggest adding the following plan components to the final plan:

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\* FW-SUIT-RECTECH 01: Electric bicycles use is suitable on designated motorized routes in semi-primitive motorized, roaded natural, and rural settings.

We also suggest modifying the ROS suitability language as follows:

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\* FW-SUIT-ROSSPM 01: Motorized use, including e-bikes, is suitable on designated routes in semi-primitive motorized settings.

\* FW-SUIT-ROSRN 01: Motorized recreation travel, including e-bike use, is suitable on designated routes within roaded natural settings.

\* FW-SUIT-ROSR 01: Motorized recreation travel, including e-bikes, is suitable on designated routes within rural settings.

#### Inventoried Roadless Areas

Roadless areas are incredibly important for forest ecological health and provide high-value backcountry recreation opportunities. We appreciate that the draft plan acknowledges the value of roadless areas for primitive and semi-primitive recreation opportunities, and that the draft plan contains suitability components that ensure roadless areas will be managed in accordance with the 2001 Roadless Area Conservation Rule. In addition to the plan components currently in the draft plan, we suggest adding:

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\* FW-DC-IRA 02: These areas provide large, relatively undisturbed landscapes with high scenic quality that are important for backcountry recreation where visitors feel as if they are in a natural place devoid of roads where they can explore, observe nature, and challenge themselves. Because these lands are minimally disturbed, they

provide clean drinking water and function as biological strongholds for populations of at-risk wildlife and plants. They also serve as buffers against the spread of non-native invasive plant species and serve as reference areas for study and research.

\* FW-DC-IRA 03: Management activities conducted within this MA should be consistent with the scenic integrity objective of High.

\* FW-GDL-IRA 01: When developing the proposed action for a NEPA project, consider conducting restorative activities such as road decommissioning and reclamation within the project area to move towards desired conditions.

## Fire, Fuels, and Vegetation

Traditionally the Forest Service has not given much thought to how recreation, particularly dispersed recreation, fits within fire and fuels or vegetation management. However, because section 219.10 of the 2012 Planning Rule requires integration,

because the CGNF will have large fires in the future and these fires will impact recreation resources, and because vegetation management can also impact recreation, it is important that the revised forest plan include language to better integrate recreation considerations and opportunities into fuels management projects.

To integrate fire and fuels, or vegetation management, with sustainable recreation we suggest adding the following language to the final plan:

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\* FW-GDL-VEGF 06: Consider NF system recreation facilities including trails, roads, signage, camping, climbing and parking areas during vegetation project planning as appropriate to the context of the landscape, watershed, wildlife and forest health management scenarios.

\* FW-GDL-VEGF 07: Consider evaluating opportunities for trail system and other recreation infrastructure optimization during the development of vegetation projects.

\* FW-GDL-FIRE 04: Consider re-routing or re-aligning existing system trails to provide for better fire management solutions, to improve maintenance of existing recreation infrastructure, and to support sustainable recreation opportunities.

Although we feel that the language we have suggested is best suited in the role of Guidelines, the CGNF could also consider incorporating this language in to the [ldquo]potential management approaches[rdquo] section of the plan in Appendix A.



## II. Outdoor Alliance Montana Vision

Our members visit the CGNF to hike, mountain bike, fat-tire bike, paddle, climb rock and ice, backcountry ski, cross-country ski, and snowshoe. Access to, and preservation of, these recreational activities is very important to our membership. In addition, an important aspect of the recreational experience on the Gallatin [ndash] what makes this forest truly unique [ndash] is sharing this landscape with a full suite of native species. Sustainably managing recreation in balance with conserving wildlife and undeveloped landscapes on the Custer Gallatin is at the core of our vision for the future of this forest.

### We Support the Gallatin Forest Partnership Agreement

Several Outdoor Alliance Montana member organizations are members of the Gallatin Forest Partnership (GFP) and we fully support the GFP Agreement. We are pleased that Alternative C largely reflects the GFP agreement. However, there are several critical aspects of the GFP agreement that are not reflected in Alternative C or elsewhere in the DEIS. The GFP has drafted extensive comments regarding the GFP

Agreement and the draft plan/DEIS. We incorporate the comments submitted by the GFP here by reference.

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 provides recommendations for the larger Gallatin and Madison ranges as well. The GFP Agreement is a core component of our vision for the forest and reflects how we would like to see the Gallatin and Madison Ranges managed for generations to come. We hope that the Forest Service will incorporate this agreement into the revised forest plan.

### Designated and Recommended Wilderness

Designated Wilderness is an important recreational resource on the Custer Gallatin. Hikers, trail runners, backpackers, backcountry skiers, cross-country skiers, snowshoers, paddlers, climbers, and more all recreate within and highly value designated Wilderness areas. Both the Absaroka-Beartooth and Lee Metcalf Wilderness areas are world-class recreation destinations that draw year-round visitors seeking solitude and adventure. The unconfined, primitive, recreation experience that Wilderness provides is highly desirable to human-powered recreationists.

In addition to the proposed Wilderness included in the Gallatin Partnership Agreement (Cowboy Heaven, Taylor Hilgard, and the Gallatin Crest, including the Sawtooth portion of the Gallatin Range), we support recommending Wilderness for the following additional areas:

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- \* Line Creek Plateau (AB, as mapped in Alternative C)
- \* Red Lodge Creek- Hell Roaring (AB, as mapped in Alternative C)
- \* Mystic Lake (AB, as mapped in Alternative C)
- \* Republic Mountain (AB, as mapped in Alternative C)
- \* Chico-Emigrant (AB, as mapped below)
- \* Dome Mountain (AB, as mapped in Alternative D)
- \* Lost Water Canyon (Pryors, as mapped in Alternative C)

With the exception of Lost Water Canyon, these areas are particularly important for backcountry skiers and winter mountaineers. Lost Water Canyon is highly valued by hikers and includes exceptional cultural values. In addition, Dome Mountain is recognized across the region for its important winter range for elk.

The Chico-Emigrant Recommended Wilderness Area that we are proposing is a modification of Alternative D. Our recommendation includes the 2 inventoried roadless areas (Chico and Emigrant) as marked on the map for Alternative D (Appendix A, pg.

1. as well as surrounding roadless lands that were not included in the RARE II mapping. 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 this recommendation to account for future bicycle and motorized recreation opportunities. Emigrant Peak and Chico Peak offer world-class backcountry skiing opportunities that are only a 30-minute drive from Livingston. The Emigrant Gulch area in particular has grown in popularity in the past decade in part 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.

Members of the Montana Backcountry Alliance and Southwest Montana Mountain Bike Association worked together in 2018 to reach agreement on recommended wilderness management for the aforementioned three roadless areas (Chico, Emigrant and Dome). Both groups agreed that there is no current bike 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 whom 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 the two landscapes to recommended Wilderness. All three species have been observed with regularity across these roadless areas.

OAMT Chico-Emigrant Recommended Wilderness Area Proposal

As Wilderness visitation on the CGNF continues to rise it may become necessary for the Forest Service to take a

more structured approach to visitation management to ensure use does not degrade resources and that opportunities for solitude persist, particularly at popular destinations (such as Lava Lake in the Lee Metcalf or Granite Peak in the Absaroka Beartooth) or along popular trails (such as the Beaten Path in the Absaroka Beartooth). We are supportive of the Wilderness zoning structure described in the draft plan and also encourage the Forest Service to consider options such as visitor use permitting for certain areas or during certain seasons if use grows to a level where Wilderness character suffers. Many National Forests use some type of Wilderness permit system to manage for and maintain Wilderness character and there are myriad examples of how the CGNF might approach and implement Wilderness permitting.

While we don't believe this is a necessary step at this time, the revised forest plan should create the opportunity for future forest managers to use visitor use permitting if it becomes necessary.

### Backcountry Areas

There are some undeveloped areas of the Custer Gallatin that are valued for human powered recreation and require more flexible management than under recommended Wilderness, particularly to maintain mountain biking and other recreational opportunities. There are three areas in particular (two of which are encompassed by the GFP Agreement) where it is essential that access to high-quality mountain biking opportunities be preserved: Lionhead, Porcupine-Buffalo Horn, and West Pine. We strongly support a non-motorized Backcountry Area designation for these areas, so long as such a designation emphasizes wildlife conservation alongside recreation uses.

We ask that the Forest Service designate the Lionhead, Porcupine-Buffalo Horn, and West Pine as non-motorized Backcountry Areas, with a Recreation Opportunity Spectrum setting of Semi-Primitive Non-Motorized (summer) and Primitive (winter). The Gallatin Forest Partnership Agreement includes recommendations for managing the West Pine and Porcupine-Buffalo Horn Backcountry Areas, and we are supportive of these recommendations and the comments the GFP has submitted on the draft plan and DEIS regarding these areas.

The Lionhead has remote, natural, difficult terrain that is valued by wildlife and people alike. It provides important wildlife habitat for a range of species migrating from Yellowstone National Park. It is also a popular destination for mountain bikers, many of whom have invested significant time and energy into stewardship projects on trails within the Lionhead. The Lionhead is also a popular summer hiking and backpacking destination. In the winter, the Trapper Creek area within the Lionhead is popular with backcountry skiers who strongly desire that it remain non-motorized and undeveloped.

To maintain the existing characteristics of the area we do not want to see trail development expanded beyond the existing footprint and management of this area should closely align with our (and the GFPs) recommendations for managing the Porcupine-Buffalo Horn area. In developing our recommendations for the Buffalo Horn area, we looked to the Cabin Creek Recreation and Wildlife Area as an example. And, just the GFP would like to see additional desired conditions identified for the Buffalo Horn Backcountry Area (as described in the GFP comments), additional plan components beyond what are currently included in the DEIS are necessary to manage the Lionhead appropriately.

The Lionhead's high wildlife and recreation values require proactive management to prevent the degradation of the important wildlife habitat values, potential conflicts between wildlife and recreationists, and to preserve opportunities for solitude. We believe the desired conditions must reflect the importance of managing for these values as well. Currently there is only one desired condition for the Lionhead Backcountry

Area, focused on quiet, nonmotorized recreation. While we support this, and the other plan component the Forest Service has developed for the Lionhead Backcountry Area, we also recommend the Forest incorporate additional plan components to reflect our vision. Protecting wildlife and wild character are central to consensus support for a Lionhead backcountry area. As a result, we recommend two additional desired conditions, similar to the language included for the Cabin Creek Recreation and Wildlife Area (MG-DC-CCRW):

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\* MG-DC-LHBCA 02: Wildlife habitat for big game, grizzly bears and other native species provides foraging, security and migration corridors to allow wildlife to coexist with human use of the area.

\* MG-DC-LHBCA 03: The area retains its wild, remote and natural character.

If you do not feel that these desired conditions fit within the definition of a Backcountry Area, then we recommend crafting a special management area (SMA) that could reflect our desired conditions for the Lionhead, in addition to West Pine and the Porcupine- Buffalo Horn, to ensure that future managers understand the intent of the management direction.

While we want to see existing mountain bike use, on the existing system trails, continue, OAMT does not believe there should be further trail development in the Lionhead and we want to ensure that recreation use (of all types) remains low in the area. Therefore, we also suggest adding the following standard and guideline to the final plan:

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\* MG-STD-LHBCA: New trails shall not be constructed in the backcountry area aside from minor re-routes for sustainability.

\* MG-GDL-LHBCA: If monitoring reveals that opportunities for solitude in the backcountry area are diminished, consider implementing a permitting system to limit use.

A non-motorized Lionhead Backcountry Area as we have proposed will protect the non- motorized, wild experience and wildlife habitat values in the Lionhead while continuing to allow mountain bike use where it is currently established in this invaluable area.

We also support the additional Backcountry Areas identified in Alternative C. These areas provide opportunities for semi-primitive recreation activities not permitted in Wilderness areas or suitable within recommended Wilderness. Backcountry recreation is highly valued by many different user groups and we support managing these high- quality roadless lands to protect their undeveloped character while providing mountain biking and motorized recreation opportunities where suitable. As many of these areas are critically important for wildlife, plan components for each Backcountry Area should

highlight the need to protect wildlife and manage recreation use in concert with wildlife habitat conservation.

#### Wild and Scenic Rivers

In addition to the streams found to be Wild and Scenic eligible in the Proposed Action, which we strongly support, we advocate that the Forest add the following eight streams to its eligibility inventory. They are all free-flowing, possess at least one ORV, and are conservation priorities for the paddling community:

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- \* Bear Creek, Absaroka Mountains
- \* Buffalo Creek, Absaroka Mountains
- \* Hellroaring Creek, Absaroka Mountains
- \* Porcupine Creek, Gallatin Range
- \* Lower Hyalite Creek, Gallatin Range
- \* South Fork Madison River, Hebgen Basin
- \* Taylor Fork River, Madison Mountains
- \* Sweetgrass Creek, Crazy Mountains

Lower Hyalite and Sweetgrass Creeks are of particular importance to the whitewater paddling community. Lower Hyalite Creek is Bozeman's backyard creek run, offering paddlers seasonal road-accessible Class IV creek boating which is a regional rarity. The Custer Gallatin recognizes the outstanding recreational values of the upper portions of Hyalite in the proposed action, and for paddlers these values are exemplified on the lower reach between the reservoir and the Forest Service boundary as well. We ask that the Forests consider a recreation ORV for the lower reach.

Sweetgrass Creek is the largest stream in the Crazy Mountains and possesses extraordinary scenic values. We recognize that Big Timber Creek is vastly more popular and also exemplary. We feel however that finding two streams eligible in the spectacular Crazies is more than justified. Sweetgrass Creek features scenic waterfall views from an adjacent trail, adventurous high quality whitewater paddling, and fishing. We ask that the Forest Service give Sweetgrass additional consideration for eligibility based on a scenery ORV.

The other additional streams that we have listed also provide outstanding remarkable scenic, recreational, and wildlife values. Buffalo Creek is home to a thriving population of native Yellowstone cutthroat trout. Hellroaring Creek provides a remote whitewater run paralleled by the Hellroaring Creek Trail and offers a trail connection between the Forest and Yellowstone National Park. Porcupine Creek is also an outstanding

recreation corridor. The trail along Porcupine Creek is popular with hikers and mountain bikers in search of a wilderness-like experience and great views back towards Lone Mountain. The South Fork of the Madison features healthy runs of large rainbow and brown trout that migrate up from Hebgen Lake in the spring and fall, respectively.

Meanwhile, the headwaters of the Taylor Fork are home to one of the only native westslope cutthroat trout fisheries in the Gallatin drainage. The Taylor Fork is renowned habitat for grizzly bears and migratory elk herds that cross back and forth from the Upper Gallatin drainage to the Upper Madison drainage.

## Recreation Emphasis Areas

We are very supportive of the Recreation Emphasis Area concept as a management tool and support the following 12 Recreation Emphasis Areas listed in Alternative E, with 2 modifications:

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- \* Main Fork Rock Creek (AB)
- \* West Fork Rock Creek/Red Lodge Mountain (AB)
- \* Cooke City Winter (AB)
- \* Boulder River (AB)
- \* Yellowstone River Corridor (AB)
- \* Bridger Winter [ndash] (Bridger, Bangtail, Crazy Mountains) we propose expanding this designation north to the Fairy Lake basin
- \* M area (Bridger, Bangtail, Crazy Mountains)
- \* Hyalite (Madison, Gallatin, Henrys Lake Mountains) [ndash] we support the boundaries of this Recreation Emphasis Area described in Alternative C
- \* Storm Castle (Madison, Gallatin, Henrys Lake Mountains)
- \* Gallatin River (Madison, Gallatin, Henrys Lake Mountains)
- \* Hebgen Winter (Madison, Gallatin, Henrys Lake Mountains)
- \* Hebgen Lakeshore (Madison, Gallatin, Henrys Lake Mountains)

Several of these recreation emphasis areas include recreation resources that are very important to our constituents. For example, Hyalite and Gallatin Canyon are home to some of the best climbing in Southwest Montana. Hyalite is world-renowned for its high concentration of naturally-occurring waterfall ice and climbers were instrumental in securing winter access to Hyalite Canyon. Gallatin Canyon contains a high concentration of bolted and traditionally protected rock climbs of all grades. Cooke City, Red Lodge Mountain, and Bridger Bowl are all major destinations for winter recreationists, with backcountry skiers using the ski resorts in the fall and spring and all types of human-powered backcountry snowsports occurring in the Cooke City area. The West Fork of Rock Creek, Main Fork of Rock Creek, Boulder River, and Yellowstone

River Corridor are all extremely important to paddlers. These four corridors provide everything from expert-level whitewater paddling to family canoe opportunities.

We support the Hyalite Recreation Emphasis Area as mapped in Alternative C, which reflects the GFP[rsquo]s recommendation, but have suggestions on how the final plan should be improved and modified to fully reflect the GFP Agreement. We support including everything from Sourdough to South Cottonwood within the Hyalite Recreation Emphasis Area in order to fully reflect the area of the northern Gallatin Range that sees the highest recreation pressure. However, we are unclear whether the draft plan[rsquo]s statement that recreation emphasis areas are suitable for [ldquo]a high density of recreation development[rdquo] (FW-SUIT-REA) means they are suitable to absorb a lot of people or suitable for increased developed recreation sites or a greatly expanded footprint. The only new recreation development envisioned by the GFP within Hyalite are new single- track trails to create loop rides and better trail connectivity outside of the Wilderness Study Area. If the CGNF[rsquo]s definition of high density is incongruent with our vision of limiting development beyond trail-building to improve trail connectivity and loop opportunities, then an additional plan component is required in the Hyalite REA

management direction to clarify that development should be limited to trails. This concern carries over to other Recreation Emphasis Areas as well, as we do not believe areas that receive high use necessarily require increased development in the manner of paved campgrounds, developed facilities, etc.

In addition, because we are supportive of continued cross-country ski trail grooming in Sourdough and Hyalite Canyon (and elsewhere), we want to highlight the GFP's concern that, the desired condition for SPNM winter (FW-DC-ROS 06) includes the phrase "Trails are generally un-groomed [hellip]." This could be interpreted to mean that groomed trails for nonmotorized winter recreation in both Sourdough and Hyalite are not allowed if they are designated SPNM. We support the SPNM winter designation for the northern part of the Gallatin Range but we suggest deleting the language that "trails are generally un-groomed" to avoid confusion or changes in interpretation down the road.

Furthermore, as Hyalite is the municipal watershed for the City of Bozeman, the desired conditions for Hyalite Recreation Emphasis Area should look beyond the recreational value and uses of the area. The final plan should include additional desired conditions that speak to protecting the wildlife and wild values of the Hyalite area as well as more specifically ensuring a clean, reliable water source for Bozeman.

The GFP submitted extensive comments on Hyalite that raise these concerns as well as additional suggestions for how the final plan should address Hyalite in accordance with the GFP Agreement. As noted earlier, we are supportive of the GFP Agreement and incorporate the GFP's comments into this letter.

Due to the high level of backcountry recreation north of Bridger Bowl, the Bridger Winter Recreation Emphasis Area should be expanded north to Fairy Lake. Fairy Lake is a popular recreation destination, often said to be "the next Hyalite" insofar as recreation use is expected to increase as Bozeman grows. In addition, because backcountry snowsports activities are increasing, and ongoing issues continue 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 and include direction to the Forest Service to re-visit winter travel management in the Bridger Winter Recreation Emphasis Area.

Each Recreation Emphasis Area designation should be accompanied by specific plan components that are unique to each area that will guide sustainable recreation management. The forest-wide recreation emphasis area plan components are a good first step but they do not address the specifics of each unique area. Some Recreation Emphasis Areas are highly developed frontcountry areas, while others offer a more remote backcountry experience. Some offer both. If the final plan does not speak to the specifics of each area, the CGNF will have lost an opportunity to proactively manage use in the most heavily visited areas of the forest. We are also concerned that some of the forest-wide Recreation Emphasis Area plan components aren't a good fit for all of the proposed areas. For example, as we discussed earlier in these comments, FW- SUIT-REA 01: "Recreation emphasis areas are suitable for a high density of recreation development" raises a red flag for us. While it is true that many areas within the proposed Recreation Emphasis Areas are suitable for a high density of recreation development, in some cases including paved campgrounds or other infrastructure, this suitability component is not applicable across the entirety of any area.

Presently only a few Recreation Emphasis Areas have specific plan components in the draft plan but each Recreation Emphasis Area should have associated Desired Conditions, Objectives, Standards, and/or Suitability components in the final plan. For example, we suggest the following for the Bridger Winter Recreation Emphasis

Area:

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\* BC-DC-BWREA 01: The Bridger Winter Recreation Emphasis Area provides sustainable recreational opportunities and settings that respond to increasing recreation demand and changes in uses.

\* BC-DC-BWREA 02: 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.

\* BC-DC-BWREA 03: 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.

\* BC-OBJ-BWREA 01: 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.

Designating Recreation Emphasis Areas is a way for the forest plan to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable [ndash] both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. Throughout the Draft Plan the CGNF has done a commendable job of integrating recreation with other aspects of forest management.

This includes FW-DC-REA 05 and FW-GDL-REA 01, both of which integrate vegetation management and recreation management.

### III. Monitoring

Forest planning does not end with the publication of a Record of Decision. The revised forest plan will be a living document and monitoring, evaluation, and adaptive management are critical to successful and sustainable forest management. Not only is monitoring required by the 2012 Rule, it is an essential component to adaptive management and a key piece of OAMT[rsquo]s vision for the Custer Gallatin. Much of the public debate around the forest plan revision has focused on how, or if, recreation impacts wildlife and how the Forest Service should manage its lands and the recreation that occurs upon them to protect the forests highly-valued wildlife populations. This forest is extremely valuable for both recreation and wildlife and these values are interconnected. The presence of healthy wildlife populations in an intact ecosystem enhances the recreationists experience, but unchecked or poorly managed recreation can negatively impact wildlife. Monitoring and adaptive management are essential to achieving sustainable recreation management and ensuring wildlife populations on the CGNF continue to thrive.

Management strategies may include (but are not limited to) limiting use during periods where wildlife are vulnerable such as elk calving in the spring or wolverine denning mid- winter, restrictions on dispersed camping or other uses, and permit systems in heavily visited areas. Any necessary management prescriptions or use limitations should be

equitably applied across user groups. We appreciate that the draft plan includes FW- GO-WL 04 and 05, but to achieve these goals the CGNF will need robust monitoring and data collection.



Unfortunately, the draft plan as currently written does not include monitoring questions specific to recreation impacts to wildlife. As monitoring questions must relate directly to plan components, we recommend the following plan component for wildlife:

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\* FW-DC-WL 09: Recreation management in key linkage areas should include design features to restore, maintain or enhance habitat connectivity for long distance range shifts of wide ranging wildlife species.

\* FW-DC-WL 10: Recreation uses and infrastructure do not increase wildlife habitat fragmentation.

To ensure the forest is achieving these desired conditions, the final plan should include the following monitoring questions:

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\* MON-WL-16: Is recreation use materially displacing wildlife populations from critical habitat?

\* MON-WL-17: Is there a material increase in wildlife habitat fragmentation due to recreation activities?

In addition, the final plan should include [Idquo]#/location of incidents of wildlife displacement[rdquo] and [Idquo]#/types/location of changes in wildlife habitat use[rdquo] as implementation indicators for MON-WL-3, [Idquo]What are the number of wildlife conflicts[rdquo] and include MT Fish Wildlife and Parks and Custer Gallatin forest biologist monitoring data in the associated list of data sources for these monitoring question. Likewise, for our proposed monitoring questions, MON-WL-16 and 17, implementation indicators should include similar metrics to MON- WL-3 as well as [Idquo]percent change in unfragmented wildlife habitat[rdquo]. We also suggest that the CGNF work with MT Fish Wildlife and Parks to monitor wildlife occupancy and recreation use in high value areas or areas of concern and examine how wildlife occupancy changes over time in relation to recreation use (including, but not limited to: types of recreation use, location of activities, duration of activities, and number of people).

#### IV. Conclusion

Outdoor Alliance Montana strongly supports the 2012 Planning Rule and our national partners are heavily invested in its success on the ground. We have invested, and will continue to invest, significant energy into ensuring that the Custer Gallatin[rsquo]s revised forest plan successfully integrates sustainable recreation management, promotes

partnership opportunities, and protects and conserves forest resources. This forest contains world-class recreational resources, unique and important natural features, and is a destination for millions of visitors each

year. Much is at stake in this revised plan and we want to help ensure that it is robust, sustainable, and able to adapt to whatever changes the next 20 years may bring.

The communities surrounding the Custer Gallatin, particularly Bozeman, are among the fastest-growing in the nation and people are moving to this region in large part because of public lands and the outdoor recreation opportunities they provide. The Custer Gallatin currently provides phenomenal outdoor recreation opportunities in balance with a healthy ecosystem and thriving wildlife populations. Maintaining this balance into the future, under stressors ranging from climate change to human population growth, will be a challenge but is fully achievable with thoughtful and proactive planning. This is an opportune time to revise the forest plan and we look forward to continuing to be a full partner in this effort. We appreciate the opportunity to provide comments and we look forward to continuing this conversation.