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Comments: IMBA seeks to participate in discussions around the following topics that have been identified in the USFS document titled, "Preliminary Summary of Custer Gallatin National Forest Land Management Plan Revision Objection Issues".

*Areas recommended for wilderness designation, location and boundaries of backcountry areas and recreation emphasis areas, and wild and scenic river eligibility.

*Designated area and plan allocation land management plan direction (wilderness, wilderness study area, recommended wilderness, inventoried roadless areas, backcountry areas, recreation emphasis areas, key linkage areas and the Continental Divide National Scenic Trail).

*Motorized and/or mechanized recreation access and suitability determinations in recommended wilderness, roadless areas, key linkage areas, and backcountry areas.

*Managing for population growth, increased recreation pressure, and user conflict.

*Monitoring program questions and indicators.

Please provide a brief explanation of your interest in the objection(s) and any specific concern(s), including a description of your support or opposition to the objection(s):

*Areas recommended for wilderness designation, location and boundaries of backcountry areas and recreation emphasis areas, and wild and scenic river eligibility.

oThis issue is of keen interest to our membership. Trail access for mountain biking has experienced profound losses due to designation of Recommended Wilderness areas based on boundary locations. We have participated in and supported backcountry areas and recreation emphasis areas in the CGNF plan. We are supportive of the current FEIS determinations and designations and specifically in the re-assignment of the Lionhead Areas as a Backcountry Area. Any discussions, objections, and/or negotiations on backtracking on these decisions made potentially threaten mountain bike access and we want to be involved to defend our access and cherished opportunities. Any new discussions of new Recommended Wilderness are also of keen interest and we do not support any further loss of access. We do not support any new or expanded RWAs beyond what is already included in this FEIS plan.

*Designated area and plan allocation land management plan direction (wilderness, wilderness study area, recommended wilderness, inventoried roadless areas, backcountry areas, recreation emphasis areas, key linkage areas and the Continental Divide National Scenic Trail).

oSame comment as above. Certain designated areas and plan allocations threaten bike access. Any discussions, objections, and/or negotiations in regards to altering the decisions made in the FEIS/ROD potentially threaten mountain bike access and we want to be involved to defend our access and cherished opportunities. We do not support any new or expanded RWAs, reductions of BMAs or REAs beyond what is already included in this FEIS plan.

*Motorized and/or mechanized recreation access and suitability determinations in recommended wilderness, roadless areas, key linkage areas, and backcountry areas.

oThe term "Mechanized recreation" has long been considered by the USFS to include mountain bikes and almost exclusively refers to bikes at this point in USFS culture. Region 1 of the USFS has long sought to evict bikes from RWAs and other land designations and allocations. IMBA and our members have fought hard to protect bike access in this plan and for the most part we are supportive of the FEIS. If predatory objections seek to potentially revisit or erode these hard fought access wins and defenses, then we want to be involved to further review, oppose, and/or support the FEIS decision and prevent post FEIS losses. IMBA does not support bike bans in Recommended Wilderness, however, the CGNF Plan has carefully designed and designated RWAs that we can support. We cannot support changes to this that would result in further trail access losses.

*Managing for population growth, increased recreation pressure, and user conflict.

oIMBA recognized the challenges of this issue. But these issues cannot be conveniently utilized as objections to

seek additional predatory access losses and trail closures. Claims of user conflict cannot be raised post decision in a last attempt to seek trail access closures. IMBA wants to be present to defend against any potential attacks on access based on the issues in this objection topic. We support the FEIS/ROD which factored in populations growth, recreation pressure and known or expected user conflict.

*Monitoring program questions and indicators.

oThe USFS laid out a monitoring plan. No monitoring plan is perfect or can be created that prevents any resource impacts. Monitoring is used to assess and weigh uses, impacts and conditions against other factors of value in a risk:value ratio. We seek to defend against any objection that suggest overly onerous monitoring that would create burdensome protocols and overreach as a way to limit recreation opportunities. IMBA supports the current FEIS/ROD

*Land management plan direction and use of best available scientific information for wildlife including: * Bison habitat and management * Bighorn sheep disease transmission * Connectivity * Providing for diversity of all native species; recovery and conservation of federally identified species grizzly bear, lynx, and wolverine * Identification of species of conservation concern

oThe Forest Plan rule and regulations require the USFS to make decisions that consider and create prescriptive wildlife management and practices. These factors and elements in the Forest Plan are inherent and found throughout the EIS review documents and assessments. It is not necessary to describe every wildlife management step that is expected, weighed, and will be utilized in a plan allocation or land designation when these factors made up the basis for the decision that created the allocation or designation. They are inherent in the intent and set forth in the goals of the area. It is therefore not necessary for objectors to seek to have every detail and potential scenario described and addressed in the plan direction. IMBA supports the current FEIS/ROD and sees no reason to add elements that likely artificially tie the hands of the USFS or dictate a solution or predetermine an outcome. In most cases, flexibility is needed to manage the land in the most efficient and effective manner and we seek to defend against onerous additions that serve as redundant bureaucratic redtape serving to appease hyper concerns or clog the management process.

Please identify when you commented during the planning process (scoping, draft EIS, and/or final EIS): IMBA has standing to file as an interested party based on our DEIS Revision #50185 comments which were received by your CGNF system on 6/6/2019 with a letter ID of: 50185--2788--8224.