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Comments: Planners,

Comment from Montana Mountain Bike Alliance is attached.

Greg Beardslee

Secretary

Montana Mountain Bike Alliance

[letter attachment pasted in:]

March 15, 2024

Attention: Lolo National Forest Supervisor's Office c/o Amanda Milburn, Plan Revision

Montana Mountain Bike Alliance (MMBA) was organized in 2007 to provide a united voice for mountain bike riders across Montana. Our mission is to preserve, protect, and promote mountain bike access and diverse riding opportunities on Montana's public lands through education, communication, and unified action. We promote and educate our constituency regarding public land stewardship, social etiquette and the environmentally sensitive practices of trail riding and maintenance.

MMBA is extremely concerned about the Lolo NF Forest Planning comment process, whether our proposed solutions will be heard, noted and understood. We recognize the responsibility of the USFS to identify land potentially suitable for future inclusion in the National Wilderness Preservation System, to label and possibly restrict its use as Recommended Wilderness, and to submit these findings to Congress. Lolo National Forest uses standardized measurement and scoring tools to evaluate these wild lands, creating a scorecard of wilderness characteristics for each polygon. Our great concern is that no such scoring method exists for the traditional recreation uses in potential Recommended Wilderness units, and that recreation uses and access will be curtailed by this evaluation process. Two areas stand out as significant losses of mountain biking access. Lacking a recreational scoring method, planners must take the time to understand and analyze every comment from the public concerned about recreational access.

New Tools

In the past, bicyclists, snowmobile riders and other non-wilderness activities were allowed in Recommended Wilderness. We had a luxury of unencumbered access. This access is now challenged by two Recommended Wilderness restrictions proposed by Lolo National Forest. Fortunately, there are new tools in the Forest Planning toolbox! The Custer-Gallatin NF used Backcountry Management Areas and Recreation Emphasis Areas as new administrative areas in addition to Recommended Wilderness. The example of Custer-Gallatin's new Forest Plan is how those tools can be used to recognize traditional public recreation instead of banning these activities in contested RWAs and is an example to be replicated.

Nez Perce-Clearwater National Forest recognized an important National Recreation Trail as a non-wilderness corridor for recreation access. This historical access is important for the public to retain. These are true solution-based designations that protect what is important yet accommodate a broader spectrum of the public.

On the Custer-Gallatin, Backcountry Management Areas were deployed in addition to Recommended Wilderness because the public expressed that their historical recreational usage had values comparable to wilderness character scoring methods. Custer-Gallatin NF created 13 Backcountry Management Areas and 10 Recreation Emphasis Areas. The Forest incorporated these progressive solutions in addition to Recommended Wilderness, recognizing what has always been obvious, that public backcountry recreation has its own intrinsic value to be recognized. Lolo National Forest, being near the last of all the Northern Region's planning efforts, can look to other Forests' precedent setting examples. Please integrate these two administrative designations into your RWA planning toolbox.

An under-utilized planning tool is the non-Wilderness corridor passing through Recommended Wilderness areas. These non-wilderness corridors are ubiquitous in Wilderness Areas across the southwest regions of USFS and BLM but have been notably absent in Forest Planning on the Northern Region. Often recreational activities follow a linear route, like a road or trail. Corridors overlay these routes, and are there to accommodate utilities, inholdings, motorized roads, and motorized and non-motorized recreation trails. The National Wilderness Preservation System contains over 2000 miles of non-Wilderness corridors. The wilderness.net interactive map shows a graphic display of these non-wilderness corridors and their evident value to preserving important recreational and administrative access. Corridors are a significant tool. The appropriate time to identify and show these important corridors is during the Forest Planning process.

Different offset distances can apply to non-wilderness corridors, such as 50 ft either side of a trail, or even 500 yards either side of a motorized road. Important non-wilderness corridors should be noted while Recommended Wilderness boundaries are evaluated! Nez Perce-Clearwater National Forest correctly identified the need for a non-wilderness corridor for the State Line National Recreation Trail in the Great Burn. Like the Nez Perce-Clearwater, Lolo National Forest can address some of the social and political division in Montana that has slowed, or blocked, the passage of Wilderness bills by using non-wilderness corridor designation. To correct this oversight, Montana Mountain Bike Alliance recommends Lolo National Forest identify non-wilderness corridors and manage them as linear Backcountry Management Areas.

MMBA recommendations:

Great Burn - Polygon GB-PW-08

Heart Lake.

Situated next to Hoodoo Pass, Heart Lake trail combined with the State Line National Recreation Trail form to create a treasured classic backcountry mountain bike route. This area is a snowmobiling destination for generations of Montanans. Heart Lake area has extremely high value as a recreation amenity, making the area suitable as a Backcountry Management Area.

State Line National Recreation Trail corridor.

Stretching between Hoodoo Pass and Schley Saddle is a scenic portion of the State Line National Recreation Trail, enjoyed by mountain bike riders since the mid-1980s. Primarily a 2-to-3-day bikepacking route, it's a route perfect for the cycling fisherman. Many of the lakes are a short walk from the trail, offering good fishing opportunities. Our National Recreation Trail system is a bicycle friendly designation. The State Line Trail is a perfect example of a route meeting the physical criteria to become a Backcountry Management Area non-

wilderness corridor. In actual practice, a corridor's narrowest description of 50 feet either side of the trail, creates a minimal removal of potential wilderness acreage. Nez Perce-Clearwater National Forest applied a corridor width of 150 feet (assume 75 feet either side of trail). While corridor width is arbitrary this fact is not; now is the time to identify important recreational routes on Lolo National Forest when the boundaries of Recommended Wilderness are being determined. Lolo National Forest should coordinate this important trail corridor with Nez Perce-Clearwater National Forest.

National Recreation Trail designation promotes some of our country's highest caliber trails with the intention of providing recreation access to urban and rural communities, economic development through tourism, and healthy recreation opportunities. Due to poor design and fragile soil stability, this spectacular trail will need future rerouting to improve its sustainability. Allowing access to a full spectrum of non-motorized recreation will create a strong user base to help facilitate future trail upkeep and improvements.

Blackfoot Clearwater Stewardship Act. Polygon BMWC-PW-06

Montana Mountain Bike Alliance has serious issues with elements of the Blackfoot Clearwater Stewardship Act but agrees with the basic premise of the Act; to provide for the conservation, restoration, and enjoyment of a certain portion of Lolo National Forest within the Seeley Lake Ranger District. We understand the Forest's obligation to identify lands to recommend to congress for future inclusion into the National Wilderness Preservation System, but we also believe the inverse is valid, that Lolo National Forest should, during Planning, take up study of Senator Tester's important legislation, considering the Act as a guide, indicating that certain recreation destinations in the district have a recreational value exceeding recommended wilderness value.

All the proposed management maps show Recommended Wilderness and Primitive Areas that fail to acknowledge this important legislation along with recreation trends that should have given Lolo planners thoughtful pause. Lolo National Forest has allowed mountain bike recreation and pervasive outfitter activity for decades yet the proposed Recommended Wilderness doesn't reflect this ongoing use! This lack of recognition shows significant disconnect with the public use and appreciation of the Otatsy area. Scenic integrity maps show much of this area and eastward into Wilderness as having a Desired Very High Scenic Integrity Objective. The proposed objective highlights the management disconnect with conditions on the ground, as the entire overlay has been incinerated. As an agency managing public lands, Lolo National Forest has the opportunity and responsibility to proactively create a map that is more responsive to the needs of the landscape and desires of recreating public. MMBA is expressing in the strongest of terms to the Lolo National Forest that this Recommended Wilderness Area must be modified.

Center Ridge including Young's Pass.

Center Ridge Trail, a valued public resource, lies within RWA polygon BMWC-PW-06. MMBA recommends an RWA boundary adjustment to exclude the Center Ridge Trail #216 in its entirety from near Monture Guard Station to its western termination at Young's Pass. These boundary adjustments are of high value to mountain bikers and the Seeley Lake snowmobile community. This RWA adjustment would not only recognize the trail as an important backcountry recreational resource, but it would help set the stage to restore the western portion of the trail, a public resource that has been neglected and removed from the Travel Plan Map since the area burned. By restoring Center Ridge Trail to Youngs Pass, a new, unsightly trail from Lodgepole Creek trailhead to Center Ridge would NOT need be required!

South and adjacent to the Young's Pass Trail, snowmobile activity was removed from the east-facing slope. We recommend restoring snowmobile access south and east of Young's Pass as practical compensation for loss of nearby Monture snowmobile closures. This high value slope coupled with a Center Ridge Trail easement should be recognized as a Backcountry Management Area. Center Ridge boundary adjustment is a prominent, important feature in the Blackfoot Clearwater Stewardship Act. The expanded area

recommended by MMBA up to Young's Pass is a common-sense, practical addition to a Center Ridge adjustment that would be more environmentally responsible than a new possible connection from Lodgepole Trailhead.

Spread Mountain and Otatsy.

Senator Tester's Blackfoot Clearwater Stewardship Act seeks to enshrine certain backcountry areas for their high recreational value while also creating significant additions to Scapegoat and Bob Marshall Wilderness Areas. Unfortunately, the legislation will create almost impossible access hurdles for mountain bikers to scale. MMBA notes the proposed Spread Mountain Recreation Area lacks access, setting the stage for this area to languish for many years until a new Spread Mountain trail is constructed. To correct this access challenge, MMBA would like Lolo National Forest to consider creating an Otatsy Backcountry Management Area from Falls Creek to the Northfork Blackfoot Trailhead. This administrative designation would replace some of the Recommended Wilderness, to accurately reflect ongoing public recreational activities and provide access where it currently exists. Trails in the area have been constructed without regard to soil type and wildfire caused erosion. Due to fire, trail design and soil type, trails and surrounding slopes need restoration and require unencumbered access to execute restoration efforts. Both Recommended Wilderness and the Blackfoot Clearwater Stewardship Act are unnecessarily restrictive and would set in motion more deterioration of public trail resources. Possible access closures from Recommended Wilderness and the Blackfoot Clearwater Stewardship Act fail to recognize the value of historic diverse recreation in that area and attempt to curtail a practical mountain biking trail system to alpine lakes with, effectively, nothing offered for replacement! It's extremely important for Lolo National Forest to modify this portion of Recommended Wilderness to accommodate ongoing public activities and overdue repair.

Rice Ridge Fire.

The Rice Ridge fire of 2017 decimated the ecology of the Blackfoot Clearwater Stewardship Act and Recommended Wilderness. The fire and other previous fires have profoundly altered the land, leaving it fragile, altered wildlife habitat, with diminishing Recommended Wilderness values. Most of this area still needs restoration and stewardship to improve the ecology of the Bear Management area, to restore recreation access, and to reign in trouble spots of post-fire erosion. In this vein, Montana Mountain Bike Alliance recommends taking a detailed look at all areas of potential Recommended Wilderness across the Forest that have been affected by fire and evaluate if certain locations should be removed from RWA consideration to facilitate restoration or stabilization projects.

Carlton Ridge

Carlton Ridge is an area of concern for mountain bicycling access. This high-country trail, culminating at Carlton Lake, provides a close to home experience for Missoula cyclists. From what we can tell, Recommended Wilderness won't encumber bicycle access to Carlton Ridge and Lake. MMBA appreciates Lolo planning restraint, allowing access to continue.

Cube Iron Mountain

Prime mountain bike trails exist within the eastern portion of Cube Iron Mountain's primitive area. The entire ridgeline from Mt. Silcox to north of Cube Iron Mountain and eastward is a mountain bike destination. MMBA appreciates that this Backcountry Area has a primitive core. Riders treasure the lakes, views, and generally uncrowded trails of Thompson River's West Fork. MMBA recommends retaining bicycling access throughout this oasis.

Petty Mountain

Petty Mountain has been an idyllic mountain bicycle destination for decades. The meadowed ridgeline, trail #8, is highly valued by western Montana mountain bicycle riders. The non-motorized and primitive nature contribute a wild flavor for visiting cyclists.

Sapphire Divide

Known by several names, The Easthouse National Recreation Trail #313 is important to mountain bicycle riders. From Skalkaho Pass to Cinnabar Saddle, Trail #313 is important to us. It needs a huge amount of maintenance from invested public. MMBA is pleased to note this area isn't proposed as Recommended Wilderness.

Recreation Emphasis Areas.

To better respond to recreation trends, Montana Mountain Bike Alliance recommends creating a Recreation Emphasis Area encompassing from Rattlesnake National Recreation Area through Marshall Mountain and northeastward to encompass Rice Ridge. This would provide an administrative framework to generally coordinate efforts to manage and enhance all manner of public recreation in harmony with a partially overlapping Bear Management Area. Proposed management maps show diverse area conditions, but not an overarching management boundary that would coordinate the conditions with recreation and connectivity ambitions. This valued area generally between Missoula and Seely Lake needs a focused and sensitive public management plan guiding connectivity and future activities, and a Recreation Emphasis Area is key.

Fallibility of using the old Recommended Wilderness Map.

It is important to note: The map provided by USFS to base our comments on is such an inappropriate scale that it is difficult to provide accurate comments for the subtle changes requested.

Several problems exist from using the 1986 Recommended Wilderness Map. Most notable is that it doesn't coordinate most recent forestry practices, public recreation trends, and wildfire impacts, which makes the map inaccurate. By only looking at 1986 Recommended Wilderness sets up forest users for polarization, conflict, and resulting discrimination. This approach creates inequities by enshrining a hierarchy into the evaluation process, placing Wilderness character scoring above all other values. Montana Mountain Bike Alliance recommends seeking out all manner of recreation users to fairly note and evaluate their activities within and adjacent to Recommended Wilderness. So far, Lolo National Forest has shown deficiency in understanding public backcountry recreation. We're encouraged by the recent notice that states Lolo National Forest will be reading every comment.

Evident by its Planning Decision, Custer-Gallatin National Forest is to be commended for evaluating recreational uses and incorporating Backcountry Management Areas and Recreation Emphasis Areas as management tools. These concepts were presented at the Seeley Lake District Ranger Chat, but the resulting minutes didn't reflect our input or concerns. In contrast to the Custer-Gallatin, our comments were disregarded. This Lolo planning effort should more effectively capture public concerns.

Evident by its ongoing planning process, Nez Perce-Clearwater is to be commended for making difficult but fair and balanced decisions by recognizing historical snowmobile uses with a reduced Great Burn Recommended Wilderness, and also identifying the 150 foot width non-wilderness corridor for historical mountain bike access along the State Line National Recreation Trail.

Lolo National Forest has an obligation to fairly represent all the public. Public diversity is most evident by how we enjoy recreation in the Forest. In this comment, Montana Mountain Bike Alliance has voiced concerns regarding very important backcountry areas, that of the Great Burn, the Otatsy and Center Ridge areas of the Blackfoot

Clearwater Stewardship Act, Carlton Ridge, Sapphire Divide and Cube Iron Mountain. We feel, given the large acreage being considered for Recommended Wilderness, that our concerns represent comparatively modest boundary adjustments that could bring long-term public benefits to everyone. We have hope that our concerns will be met by officials during this comment period.

Sincerely,

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