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Comments: [External Email] Comment on proposed action

MOUNTAIN BIKE MISSOULA COMMENTS ON THE PROPOSED ACTION, LOLO NATIONAL FOREST LAND MANAGEMENT PLAN

MARCH, 2024

Mountain Bike ([ldquo]MTB[rdquo]) Missoula is a non-profit whose mission is to promote and create mountain biking opportunities in Missoula and surrounding areas through trail building, stewardship, advocacy, and outreach. Since 2013, MTB Missoula has formally partnered with the Lolo National Forest to perform trail maintenance and reconstruction on the Missoula Ranger District through a non-funded cost share agreement. 1 On average, we contribute 475 hours of service annually by organizing volunteers to restore tread and drains, construct authorized trail reroutes, and certify sawyers who clear backcountry trails including Sheep Mountain/E. Fork of the Rattlesnake Creek in the Rattlesnake NRA and Carlton Ridge/Mill Creek on Lolo Peak. As the leading voice for the mountain biking community in Missoula and surrounding areas, MTB Missoula understands the vital role outdoor recreation plays in promoting physical and mental health while building community and contributing to the local economy. 2

We appreciate the opportunity to participate in the plan revision process for the Lolo National Forest, a celebrated natural and recreation resource underpinning the high quality of life enjoyed by residents of West-Central Montana. As a recreation interest group, our focus is primarily on the recreational elements of the plan, namely retaining bike travel access to trails historically used for mountain biking. At the same time, we[rsquo]re also advocating for large landscape conservation due to the overlapping values of our leadership and membership. We hope that our advocacy positions described below are viewed as strategic and nuanced, reflecting care and consideration for plant and animal communities, land managers and other forest visitors alike.

Priority Areas of Concern

Geographic Area: Middle Clark Fork

Specific location: Heart Lake and Pearl Lake Trails

Position: We strongly oppose these trails being included unconditionally within the Recommended Wilderness Area, resulting in the permanent loss of bike travel, and request a non-motorized travel corridor be established under the same terms applied to the Stateline Trail by the Nez Perce-Clearwater National Forest in their 2024 Record of Decision. We otherwise support the action to achieve large landscape conservation goals via the Great Burn Recommended Wilderness Area.

Reason: We request to retain bike travel access within the Hoodoo Roadless Area via a 2 As of this writing, Missoula supports 11 bicycle retailers 1 FS Agreement No. 20-CS-11011600-019 1 summer non-motorized travel corridor on the following trails: Heart Lake (#171), Pearl Lake (#175) and the Stateline Trail (#738) segments existing on the Lolo NF. These connected trails create an excellent backcountry loop ride enjoyed since the mid-1980s and one of only a few long distance, high-alpine mountain bike rides on the Lolo NF today.

The adjacent Nez Perce-Clearwater National Forest has proposed in their Draft Record of Decision that Stateline Trail portions within that forest be managed for summer non-motorized travel. We request that this same

management recommendation be applied to trails #171 and #175, allowing for controlled bike access while simultaneously advancing the goal to create a Great Burn Wilderness Area.

Geographic Area: Lower Clark Fork

Specific location: Cube Iron Roadless Complex

Position: We strongly support the recommendation for a backcountry designation in this area which will maintain primitive characteristics while allowing for bike access.

Reason: The trails surrounding Cube Iron Mountain are among the few backcountry rides on the Lolo NF with excellent views and lush old-growth forest. Backcountry management designation ensures opportunities for solitude, resource protection, and multi-use recreation experiences.

Geographic Area: Lolo Creek

Specific location: Carlton Ridge to Mill Creek on Lolo Peak

Position: We support the recommendations for the Lolo Creek Geographic Area.

Reason: The three-miles of trail from the trailhead up to the Wilderness boundary on Carlton Ridge is excellent backcountry mountain biking close to Missoula's urban area. There is no need to further restrict bike travel access on Lolo Peak and in the Bitterroot Range where existing Wilderness Areas already preclude bike access and connectivity.

Geographic Area: Greater Missoula

Specific location: Rattlesnake NRA, Deep Creek, Petty Mtn

Position: We appreciate and support the progressive actions for the Greater Missoula Geo-Area as they are aimed at improving visitor access and connectivity both to and within the forest. We continue to remain hopeful that the user-created trail system accessed via Dry Gulch Road in the Deep Creek drainage will transfer to public ownership and eventually offer additional trail-based recreation. Forest lands located within or adjacent to the Missoula wildland urban interface and gateway sites to the forest should be considered for concentrated use management to better allow for trail connectivity and to manage visitation.

Reason: Western MT has changed significantly since the 1986 forest plan adoption. The desired conditions and objectives speak to the population growth and increase in forest visitation. The Missoula Front Country project encompassing Deep Creek holds great potential to relieve some of the visitation pressure at existing trail networks and to serve the rapid population growth occurring to the west of Missoula's urban area.

Similarly, creating connectivity to popular recreation sites via trails is desirable both from a user experience perspective and to provide a transportation alternative to single-occupancy vehicle trips. A location that typifies this is Marshall Canyon where 480 acres bordering national forest were acquired by Missoula County in 2024 for concentrated recreation development and use as Marshall Mountain County Park. A concentrated use area designation on adjacent national forest to the south and east of the park site would be ideal given the desire to create trail connections from the urban area to nearby recreation sites and beyond into the Rattlesnake NRA.

Additional Areas of Concern

Geographic Area: Clearwater Upper Blackfoot

Specific location: Blackfoot Clearwater Stewardship Act (BCSA) landscape

Position: We support the BCSA as was drafted via coalition and submitted by Senator Tester for congressional designation. The BCSA boundaries allow for mountain bike access on Center Ridge and create trail development potential into the Otatsy Lake Area.

Reason: MTB Missoula has committed to supporting this legislation[ndash]not so much for the potential of future mountain biking opportunities[ndash]but for the numerous conservation outcomes of the greater Blackfoot Clearwater ecosystem.

Geographic Area: Rock Creek

Specific location: Stony Mountain to the east of Rock Creek, Quigg Peak

Position: We do not oppose additional Recommended Wilderness around Quigg Peak, though some less popular trails (Ranch Creek) may be permanently closed to bike travel. We support the backcountry management designation on Stony Mtn. to retain access and to ensure a bike-travel connection between the Lolo, Bitterroot, and Beaverhead Deerlodge NFs.

Reason: Trail 313 north of Skalkaho Pass is excellent backcountry riding. Stony Lake Trail (Trail 8002, Beaverhead Deerlodge NF) and Big Spring Creek (Trail 1269, Lolo NF) provide a great backcountry loop-ride when linked with Trail 313.

Other Recreation Management

Topic: Recreation Opportunity Spectrum (ROS) application with regards to Primitive and Semi-primitive management overlays

Position: The ROS definitions are unclear, do not align closely with the proposed management overlays.

Reason: For ease in interpretation by agency personnel and the public, we request that the ROS management condition of [ldquo]primitive[rdquo] be exclusively applied in this plan to areas recommended for Wilderness designation or existing Wilderness. Confusion arises on this point because:

* First, designated and recommended Wilderness areas are always managed as [ldquo]primitive[rdquo] through the ROS. Wilderness is the most significant and restrictive level of landscape protection and it is reasonable that the ROS should align in degree of significance by reserving primitive management goals for Wilderness; and,
* Second, the USFS definitions provided in the Proposed Action for primitive omit any mention of mechanized transportation. In contrast, the semi-primitive definition includes clarification that [ldquo]these settings are free of motorized recreation travel, but mechanized travel may be present[rdquo] (p. 61). If mechanized travel is in fact permissible in primitive ROS settings, then it should either be stated as such in the definition or it should not be applied to areas allowing mechanized travel. Rather than debate a change to the ROS definitions, it would be easier to apply the [ldquo]semi-primitive[rdquo] overlay to any area of the forest where non-motorized mechanized travel is permissible.

Topic: Anticipating emerging recreation technologies; Class 1 (pedal assist) e-bikes Position: The Lolo National Forest needs to better account for social shifts in recreation including use of assistive technology. We do not foresee a positive outcome by largely restricting Class 1 e-bike access to the existing set of motorized trails because the mileage is inadequate to meet demand. Instead, the plan should proactively consider a management framework for Class 1 e-bikes based on evidence of rapid consumer adoption to align with the

agency's own objectives on diversity and inclusion.

Reason: We recognize the difficulty in planning for rapidly changing recreation technologies in long range land planning. At the same time, we are increasingly confident that battery powered pedal-assist mountain bikes (Class 1 e-bikes) will receive mass global adoption during the lifespan of the next forest plan. 3 Many factors contribute to this notion and the more noteworthy include: increasing industry promotion paired with consumer demand and decreasing retail costs, advances in bike/battery technology, and broad land management goals aiming to make public recreation lands more accessible and inclusive to a greater segment of the population.4

4 <https://www.fs.usda.gov/features/e-bikes-bring-new-users-national-forests-grasslands>

3 <https://www.mordorintelligence.com/industry-reports/e-mountain-bike-market>

While the USFS directive on e-bikes determined that all classes of e-bikes are motor vehicles and will be managed as such, we see the topic with greater nuance. 5 A Class 1 e-bike with motorized pedal assistance is clearly different from a traditional bike; yet, it is much more similar when contrasted with a gas-powered motorcycle or even a Class 2 e-bike with throttle functionality. Many Class 1 e-bikes currently on the market have small motors and are nearly indistinguishable from a traditional mountain bike. With adherence to posted rules and trail etiquette, it remains to be determined whether Class 1 e-bikes will cause a unique set of management problems apart from traditional bikes or other trail user groups. 6

Instead of proposing to restrict Class 1 e-bike access to a limited number of motorized trails, the plan should include an acknowledgement of rapidly changing recreation technologies and ideally, some consideration for additional Class-1 e-bike access at appropriate sites. One example for a possible recommendation is identifying sites best suited to changing trail classifications to allow for Class 1 e-bike travel. Blue Mountain Recreation Area is one potential location in the Missoula Geographic Area that has existing motorized trails that may work well for additional Class 1 e-bike access. Also, should the goal for creating recreation opportunities in the Deep Creek drainage be realized, e-bike access there is worth considering in the management plan. Conversely, recreation areas already receiving heavy visitation may not be suitable for Class 1 e-bike access based on safety, carrying capacity and other competing management priorities.

To conclude, we greatly appreciate the efforts put forth by the planning team and district staff to provide multiple engagement opportunities and address our questions in a timely manner. As a partner committed to assisting with resource stewardship, we are pleased to see the proposed action emphasize the value in building and maintaining partnerships to achieve planned goals. Putting intention into working with citizen groups should entail many benefits including building capacity while forming a more concerned community of forest users. We welcome ongoing dialogue about our points included here and look forward to continuing our participation in the management plan revision process.