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Organization:

Title:

Comments: I am submitting an attached comment letter from an informal group of concerned citizens.

Greg Beardslee

Bozeman, MT

May 5, 2024

Anthony Botello, Forest Supervisor

Flathead National Forest

Supervisor Botello,

It's been two years since we (mountain bicyclists) commented on this project. The project, except for one important detail, remains unchanged, so we will resubmit our previous comments following our 3 newest observations and comments.

Our most pressing concern has been the possible closure of Broken Leg Trail #544. This latest project release doesn't mention this trail in any way at all, as the 2022 documents mentioning Broken Leg are still included. The Forest's intent is obscure. If Broken Leg is being dropped from closure consideration, we are certainly very grateful. Thank you. It is a very important trail, part of several bicycle loops.

Our next concern was about fair and equal treatment. This was an issue in 2022 and it remains an issue. Snowmobiling has been considered with great care, and equal acreage (plus 500 acres more!) has been located on the Forest to assure those who ride snowmobiles have riding opportunity of similar quantity as the past. This appears the primary purpose of the project. But tacked on to this project is the closing of trails to "mechanized" in the designated RWA units. We understand this, it's part of the Forest Plan (but call us mountain bikers, please). Fair treatment for bicyclists would have included identification of replacement opportunities for the 96 miles of trails to be closed. We have studied ongoing projects and found only about 45 miles of non-motorized singletrack is being planned or in process. Proposing 50 miles of bicycling opportunity would have made this a fair and equitable project!

The last concern we articulated was a pressing need for forest planners to find and identify potential non-wilderness corridors in the RWA units. Some recreational routes have public recreation value that exceeds recommended wilderness value. Broken Leg Trail is one example. On the Nez Perce-Clearwater Forest planners identified the State Line National Recreation Trail as worthy of protection with a non-wilderness corridor of 150-foot width. This corridor will allow mountain bikes (and presumably chainsaws) to travel through Recommended

Wilderness. It seems our point made two years ago regarding corridors, while ignored by the Flathead, was worthy of implementation on the Nez Perce-Clearwater!! Please take a hard look at using potential corridors for practical access improvements to some of the RWAs. Corridors could equalize the extensive proposed bicycle trail closures. Route suggestions are in items 5 and 6 of our 2022 letter below.

Potentially allowing Flathead National Forest to administratively deploy mountain bikes and chainsaws in Recommended Wilderness is of little concern. Clearing trails can be time consuming and even impractical when performed with hand tools. We're glad to see common sense from Flathead National Forest.

Because our concerns were largely dismissed, our 2022 letter follows:

We approach this comment letter with great concern. Over the past 20 years Region 1 has generally treated backcountry mountain bike recreation and those who enjoy it as a second class activity and demographic, not worthy recipients of clear, honest communication.

This has become newly evident by the recent Proposed Action on all districts of Flathead National Forest by the Action's abbreviated comment period. This Forest wide Action was prefaced by the scoping cover letter stating scope and need for the Action, and it was entirely directed toward changes affecting the snowmobile community and motorized over the snow use! The proposed action has been reported in the press as an action that affects over the snow motorized uses. All the press noted that the terrain closed is roughly equal to new terrain proposed to be opened. For Region 1 Forests this extra effort spent toward forging an equitable access plan to appease motorized over the snow users and their activities must be commended and praised. This over the snow plan likely needs little modification to be accepted and implemented.

However, the over the snow plan contrasts greatly with mountain biking closures embedded in the proposed action. Closures of 96 miles of trail without fair and equitable compensation was a stunning discovery. The Scoping Cover Letter neglected to note the Action intended to impact mountain bicyclist access and so we feel the Forest intended to deceive bicyclists. How in the world were we to find out about the proposed action? Once we found out through the press, we discovered the restrictions shocking to say the least. But even more shocking is simply the manner that bicyclists are treated by both the bureaucratic language of the action and by the complete and utter disregard by Forest planners to find compensation for bicyclists for the copious amount of trail miles lost. While Forest planners truly went "the extra mile" to find equal acreage to compensate over the snow motorized users, the same planners simply swept bicyclists "under the rug". First, we weren't adequately notified of the closures, which are daunting, uncompromising, and in some areas crippling by severing current loop options. Second, because we found out partway through the short comment period, we lacked time to adequately form comments. Third, bicyclists weren't offered one single mile of new quality backcountry or high-country trail in compensation for the proposed closure of 96 miles of access! Not one single mile! What a contrast when compared to the consideration given to over the snow users. The contrast is discriminatory. We feel the Forest can do better and that bicycling, a quiet, healthy, and newly energized activity, deserves equal consideration.

We have six suggestions that can help build back those trail miles lost to closure:

One. Don't close so many miles of trail in the Recommended Wilderness Areas. Every mile of trail not closed reduces the total of new trails needed for compensation. 96 miles are a lot to us, but it's not just the sum of the mileage, some of the routes proposed to be closed are irreplaceable. These routes often provide high country vistas and grand experience that bicyclists lack elsewhere on the Forest.

Two. Understand the application of non-Wilderness corridors in the National Wilderness Preservation System. There are thousands of miles of non-Wilderness corridors throughout the System. There are dead-end corridors (cherry stems), through corridors, and loops. Some corridors are created to accommodate infrastructure such as roads, powerlines, pipelines, dams. Some are created to give inholders access to their property, such as mines,

ranches, cabins, lodges. Some corridors are created to preserve recreational experiences and those corridors can be motorized or non-motorized. Corridors can be customized. They vary in width and can feature access constraints such as seasonal closures or party size limitations. We note that a non-wilderness corridor may be proposed at Inspiration Pass Trail # 91 but the map is unclear.

Perhaps the largest example of non-Wilderness corridors exists in Death Valley National Park. Of the Park's land area over 93% is in the National Wilderness Preservation System. But the Park features over 1,000 miles of non-Wilderness corridors, much of which is aligned over singletrack trail and very narrow at 100 feet (50 feet to either side of the trail). These corridors preserve public satisfaction and trust of land management agencies. Corridors in the National Wilderness Preservation System can be viewed on the interactive map at wilderness.net website. Corridors can be identified during the messy and contentious political process that accompanies the design and advancement of each wilderness area on its journey through Congress. But better yet as the case with Death Valley, astute land managers identified important traditional recreational routes during planning phase and allowed for recreation to continue within those new corridor constraints.

A tendency exists in Region 1 to resist recognition of recreational non-wilderness corridors, a trend out of step with land managers from other Forest Service and BLM regions. The corridor concept provides for satisfaction of the public, reduces opposition toward Wilderness legislation, and gives land managers a concise management tool going forward. We feel a modest portion of the trails proposed to be closed by the Action should be identified as important recreational corridors. We stand ready to work with Flathead National Forest to identify those important trails.

Three. Across Montana our public forest health has been suffering. Trees have been dying at an unprecedented rate. Blister Rust, Bark Beetles, and wildfire have decimated hundreds of thousands of acres. Everywhere are snags falling over, and the tool of choice is a chainsaw, for salvage harvest and for keeping public trails open. Trails, our human avenues, are either maintained or lost. When mountain biking is prohibited and removed from the landscape, those trails become blocked with deadfall. Flathead National Forest can't keep up. In fact, a strong case could be made that these areas should never become wilderness simply because in just a couple of years the trails wouldn't be passable. Be prudent. Identify key trails for non-wilderness corridors through future wilderness in order to ensure those trails open to all.

Four. Bicycling has a unique role on public lands. Mountain biking culture has always respected and appreciated natural landscapes. Many mountain bike riders come from other sports and pastimes. Skiing and climbing, hunting, birdwatching, geology and wildlife conservation have all been steppingstones for those who ride mountain bikes. Mountain biking aesthetics have always featured narrow trails across wild hillsides, through deep dark recesses, and high alpine tundra. Mountain bikers, at one point in history, championed new Wilderness Areas. Before the 1984 prohibition we were friends of the Wilderness movement. Adversaries wish to paint mountain biking in a negative light and have managed to do so in Region 1 through misinformation. Mountain biking is a wholesome activity, one that promotes fitness, self-awareness, appreciation of nature, better overall health. Mountain biking is now mainstream, attracting all ages of participants. We're not all wired to hike, for many of us mountain biking feels best. Thankfully it's a quiet activity that in most cases, mile for mile, has less impact than hiking. After 45 years it's well past time for Forest Service land managers to understand and embrace mountain biking.

Five. Key trails we are passionate about. Many mountain bikers frequent the trails in Flathead National Forest's Recommended Wilderness Areas. The Tuchuck-Whale area alone has 5 major loops. Thoma Lookout, Thoma-Tuchuck Peak, and Review Mountain are among the favorites in the most northern section. Mount Hefty is a popular out and back, and ditto for Mt. Thompson-Seton. Chain Lakes and Nasukoin Mountain trails have recently had work done to them and are now ridden more and more every year in the southern proposed wilderness area. There are many bicyclists that camp at Chain Lakes. These areas are remote, but many locals ride these trails and loops all summer long. All these trails are candidates for non-wilderness corridor evaluation

that would reduce the mileage needed to make the Proposed Action equitable.

In the Jewel Basin Recommended Wilderness we have but one concern. Broken Leg Trail #544 is very dear to the mountain biking community. FAMB cleared Broken Leg in 2021 and the trail is popular once again. Combined with the yet to be restored #354 Peterson Sidehill, Broken Leg would become a treasured loop trail that could be approached from the north or south and ridden in either direction, providing a myriad of experiences. Closure of Broken Leg is absurd.

Six. Trails that could make up some of the lost 96 miles. Taylor Hellroaring Project trails, 28 miles. Crystal Cedar Project trails, about 13 miles non-motorized. Trail #354, Peterson Sidehill 3 miles. Broken Leg 544, .5 mile.

We request Flathead National Forest start over with a fresh cover letter and extended comment period that gives mountain bicyclists equal courtesy to that afforded over the snow recreationists. Alternatively, perhaps the mountain biking element needs to be removed from the over the snow plan and given equal consideration in a new, separate Action. Time and collaboration with us could be spent toward creating a new respectful Proposed Action equal to that proposed to over the snow recreationists.

Sincerely,

Concerned mountain bicyclists.

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