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Title: Secretary Comments:

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Comment on Custer-Gallatin National Forest Draft Report of Ecological, Social and Economic Conditions.

The Montana Mountain Bike Alliance (MMBA) is an organization formed in 2007 with the purpose of uniting mountain bike riders across Montana, to encourage fair land planning practices and promote sustainable trail building and maintenance protocols.

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.

Mountain biking, hiking, and horseback experiences depend on environmentally responsible land stewardship and respectful interaction with wildlife and other visitors. We present viable land management options, which preserve mountain bike access and help promote cooperation with land management agencies.

Mountain bicyclists deserve a place at the table when land management is being discussed. MMBA believes that education, a solid forest plan based on facts and science, goodwill and the ability to share will best protect and preserve the public resources and the backcountry experiences for all users.

Local National Forest Benefits -pg 63

A bullet point should be added to correct a significant omission. Bozeman, Gallatin Valley and Big Sky population is exploding, becoming by any form of measurement the fastest growing population center in the entire Northern Rockies. This astounding and unabated growth is directly tied to the Custer-Gallatin National Forest and it's role in the Greater Yellowstone Ecosystem. The Forest has become a major economic driver, bringing thousands of new residents, businesses and jobs to the Bozeman area. Businesses promote outdoor lifestyle and amenities to attract new employees. Custer-Gallatin National Forest is playing a major role in this unprecedented growth, and the Forest Plan including this draft assessment should recognize this role.

Gallatin County, Montana -pg 66

County challenges correctly note "expanding infrastructure and rising demands from a fast-growing economy, population and tourism industry". But the county synopsis misses the direct connection that ties county growth to CGNF. This situation needs to be better described.

Existing Designated Areas -pg 87

Within the assessment of Existing Designated Areas, motorized and mechanized activities are mentioned. Bicycle use is often referred to as "mechanized", a misleading and often times deceptive label. By the agencies own definition, "mechanized" means powered by a non-living

power source. Please refer to human powered bicycles as "bicycles", "bicycling" or "bicycle travel".

## Recommended Wilderness -pg 95

1. The paragraph should clearly state that "Recommended Wilderness" is an administrative designation. 2. Simply noting the approximate size and general location of seven Recommended Wilderness areas is inadequate. Because of the potential for increasing access restrictions and community conflict over these areas, this Draft Assessment should visually show boundaries at an adequate scale to inform the public. Without adequate maps the public will remain uninformed. 3. Recommended Wilderness is just what it is. A special primitive area that isn't yet, if ever, designated Wilderness. Recommended Wilderness should allow existing uses. Eliminating uses from RWA units has proven to be problematic and controversial. Eliminating uses is a political move, outside of Forest Service scope. Montana Mountain Bike Alliance recommends recognition of Recommended Wilderness Areas, but allowing existing uses to continue.

## Wilderness Study Areas -pg 98

1. An activity omitted from the Hyalite Porcupine Buffalo Horn Wilderness Study Area list is motorcycling. 2. "Litigation over land use and management actions ended a few years ago." This statement might be speculative, tying a finality to litigation. An omitted management concern is the continuing lack of public access in the entire checkerboard northeast quadrant of the HPBHWSA, and associated laundry list of stalled management projects combined with unsettled public access challenges. The statement should be revised as litigation is likely in a lull. 3. While mentioning the Gallatin Community Collaborative and it's ineffective conclusion, a new, more limited collaborative is not mentioned, but should be. This new collaborative is a spin-off of former GCC participants. 4. Many mountain bike riders are still bitter and disillusioned over the closures of the Interim Travel Plan.

Looking Forward: Conclusions and Concerns -pg 99

An omission is the lack of recognition for the new need of focused front country Recreation Areas. These areas would likely be administratively created, and should serve to focus activities away more sensitive backcountry areas. Many cyclists have brought this concern forward in Forest Plan Public Forums. A bullet point should be added.

## Ski Areas and Resorts -pg 111

The statement about Ski Areas has an omission. The 2011 Ski Area Recreational Opportunity Enhancement Act can change the way the mentioned ski areas could develop or allow summer recreation. In fact, bicyclists have identified Bridger Bowl as a potential summer Recreation Area, with the possible inclusion of adjacent Bohart Ranch Cross Country Ski Center. Ski Area potential to change according to the Act should be noted in the recreational descriptions.

Trails -pg 112

An omission about trails. 1. Off trail use should be mentioned. Many activities enjoy off trail privileges on the National Forest. Snowmobiling, climbing, mountain biking and foot travel

activities are not necessarily dependent on trails. The ability to travel off trail on public land is socially important and should be noted as a current condition. 2. Current travel restrictions continue to be unsatisfactory for winter cyclists. 3. Travel plans need an element of adaptability to allow for new uses to be evaluated and incorporated when deemed appropriate.

Looking Forward: Conclusions and Concerns -pg 113

"Ongoing assessment projects, along with database and location updates for national forest resources, outfitters, and guides are among the opportunities that will help Custer Gallatin managers to better understand recreational use on the national forest and make better informed management decisions." Mountain bike riders have gone to the Gallatin National Forest for many years with their concerns. MMBA will continue to reach out to the agency to have our needs and concerns better understood. From a cycling perspective, there has been little actual outreach to mountain bike clubs. Proactive outreach and recording recreational visitors' concerns should be added to the conclusion statement.

Looking Forward: Conclusions and Concerns -pg 117

The statements primarily address road needs, and don't address evaluation of trail needs. Trail needs are also important; trails are usually the destination for those using the roads.

Land Adjustment and Access Programs -pg 119

The Gallatin Travel Management Plan identified 46 locations with inadequate public access. However those locations aren't public knowledge, and if mentioned, should be listed in the Forest Plan as well. Since these access issues comprise about 21 percent of the Gallatin National Forest land base and resolution of the issues will take many years and cost taxpayers a lot of money, the plan should list those 46 locations.

Thank you for your thoughtful consideration.

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