Data Submitted (UTC 11): 6/4/2019 8:33:23 PM First name: Melissa Last name: Cronin Organization: Title: Comments: Custer-Gallatin Forest Plan Revision Committee and Mary Erickson, Forest Supervisor,

I have personally invested over two years in the Gallatin Forest Partnership (GFP) and several years before in the failed Gallatin Community Collaborative. From 2004 to 2007, involvement in the travel planning process, hosting meetings and attending Forest Service Events both in Big Sky and Bozeman also taught me a lot about Forest Management. I will assure you that these efforts are not because I enjoy endless meetings but rather love and appreciate the lands your agency manages and am passionate about being an active participant in ensuring environmental, wildlife, and balanced access preservation for these incredible public lands.

With this investment of time and energy, I also bring a keen appreciation for the efforts and challenges faced by the Forest Service in achieving the best balance in all of these areas. I have learned a great many things over the past few years about the small corner of the Custer-Gallatin National Forest. It would be unwise to speak to the management of this vast area in its entirety; thus these comments specifically concern the Bridgers, Gallatin, Madison and the Henry's Lake Mountains and aspects of individual alternatives offered to the public for consideration.

Support for the Gallatin Forest Partnership:

As an active participant and member of the Gallatin Forest Partnership (GFP), I support the planning recommendation and all the drafted comments submitted to the Forest Planning team this week.

Members of this successful collaborative spent two and a half years researching and educating themselves on the highest and best use and management of the Gallatin Core. With the group's abilities, we considered all forest users, forest conditions, the environment, wildlife, water-quality, Bozeman, and Big Sky growth and community concerns, recreation, and other uses. GFP produced an outstanding and focused recommendation for an area of intense interest in the region. Special care was given in drafting the recommendation and in the submitted comments.

I have lived most of my adult life amongst the Gallatin and Madison Ranges in Big Sky and have explored the extent of that area by both bike and foot. I understand the profound importance of this area for wildlife connectivity, water quality, wildlife viability, this was one of the areas we worked the hardest to come to a consensus on, and I am proud of the work we have done with establishing responsible recommendations to the Forest Service.

Please look closely and take into consideration the GFP's comments concerning Key Linkage Areas. I have a great appreciation for the intent of identifying this type of area. The GFP comments of these areas will be constructive and address some of the inconsistencies between supporting documents and planners understanding for the management of this new designation.

The allocation of RWAs and future Wilderness designation:

While participating in Forest Planning activities, I recollect a meeting held several years ago at Chief Joseph Middle School in Bozeman. At this meeting, early in the public forest planning process, participants were asked what they felt are the essential qualities and formable conditions that a forest plan need to encompass. Overwhelmingly, participants identified climate change as the most pressing concern and adaptive management strategies the most effective tool for the Forest Service to have available. Ironically Wilderness allows for the least adaptive management leaving lands adjacent to or designated as such vulnerable to unforeseeable changes, for good or bad. The theory of benign neglect can be impracticable or even damaging in the face of

change.

Indeed, the potential for creating Wilderness is exciting in certain places; it is also limiting and unwise in others. I am amazed by the zeal of some individuals promoting the implementation of the entire Alternative D.

Blanketing much of the Gallatin, Madison and West Bridgers in RWA many of their desires for wildlife health, connectivity, and limited public access, safeguarding Bozeman's water supply, fuels reduction, forest health or other obstacles presented by a growing community and climate change can't be addressed. Different management types can can be applied to many proposed RWAs in Alternative D, like Backcountry Area (BCA), or special management areas that can achieve many of the conservation goals that the "Alt D" group are pursuing but still allow for adaptive management and current recreation access. In this regard, Alternative B or C provides much more considerate options

I believe the exclusion of mountain biking from designated Wilderness has made many conservationist antimountain biking. It has propelled these individuals to take extreme stands and make a hyperbolic negative proclamation about the impact of mountain biking on the forest, wildlife, and trails. In reality, mountain bikers would be more supportive of the creation of new Wilderness if the extremes of the Wilderness movement exercise some restraint and eliminated the all or nothing attitude approach to forest management fostered by the perception that mountain bikers impede the creation of all Wilderness. While in reality, mountain bikers support the creation of Wilderness in some places and alternate management in others.

Specifically, in regards to the West Bridgers, I feel the management of the West Bridgers would be better suited as represented under plan B or C.

Management of RWAs and WSAs:

I believe managing all existing RWA and WSAs as if they are Congressionally designated Wilderness is remiss. By implementing a blanket policy, FS Region One would be unethically practicing legislation, a right reserved for Congress. It is entirely understandable to look closely at the qualities present at each RWA individually and make determinations about non-conforming uses during travel planning. If a non-conforming use had not altered or the conditions that were present when areas were designated RWA then it stands to reason continued judicial use by these users groups will not negatively affect the desired terms after the application of RWA management.

By arbitrarily managing areas of public land historically accessible to specific uses the Forest Service risks losing the support and trust of many moderate conservation-minded people that would otherwise be steadfast supporters of policies and management that sensibly protect our forest. It would be more appropriate to some of these areas as Wildlife and Recreation Management Areas, like Cabin Creek in the Gallatin's or as Backcountry Areas, making them unsuitable to "hard impacts" such as extraction, development, etc..

Wilderness is a fantastic designation, and RWAs are a good management tool on the path to Wilderness designation for certain areas. However, managing RWAs as if they are already Wilderness limits the flexibility for the Forest managers to adapt to unforeseeable circumstances due to ever-changing conditions often attributed to climate change and human activity.

Recreation certainly takes more people into the forest, but I firmly believe a culture of respect and appreciation springs from exposure to unique places. Certain types of recreation can create involved and active volunteer force that has a vested interest in the forest and its wellbeing. Mountain biking is a perfect example of this. While researching volunteer data for a grant application, I noticed many forests track the type of volunteers they see for stewardship projects. The growth of mountain bike volunteers has outstripped all other user groups in the last ten years in these areas. In particular forests, mountain bikers are representing a majority of volunteer trail workers and per capita have the highest volunteer rates.

The Henry's Lake Mountains, also known as the "Lionhead."

While participating with the Gallatin Forest Partnership, I was often struck by a map at the Greater Yellowstone Coalition office that showed the land designation in our region. In an area of roughly 100 miles by 150 miles that includes the communities of Bozeman, Livingstone, Jacks Hole and Driggs nearly 4.4 million acres of federal public lands are not accessible to non-conforming uses such as mountain biking. (Yellowstone National Park: 2.2 million acres, Lee Metcalf: 225,000, Absaroka-Beartooth: 943,648 acres, Grand Teton National Park: 310,000 acres, Goss Vante Wilderness: 287,000). This number does not include inaccessible areas due to restrictions from travel planning, agency policies regarding motorized and bike travel in WSAs and RWAs, or private land. On this poster-sized map of the Greater Yellowstone ecosystem, the Henry's Lake Mountains is the size of a silver dollar, small but of precious significance to mountain bikers.

Many of the region's mountain bikers view the Lionhead as the last remote high altitude environment that is available to them in our area. Also, mountain bikers have taken an active and very beneficial stewardship role in this small remote range. For the past fifteen years, the community of mountain bikers has arranged an annual trail clearing and maintenance weekend. When Terry Johnson was contracted to reroute and build the Mile Creek segment mountain, bikers showed support and pitched in. In 2018 Corey Biggers, a mountain bike trail steward, was named volunteer of the year by the Caribou-Targhee national forest for his efforts in the Region Four portion of the Lionhead.

In Alternative E, it recommends that the Henry's Lake Mountains become a non-motorized Backcountry Area (BCA). I support this type of management as I believe that it will preserve the current conditions/character and qualities of these beautiful mountains while still allowing mountain bikers access and the ability to maintain the trails. Non-Motorized BCA management and elimination of the RWA designation would allow the Forest Service to monitor and make logical, adaptive decisions for this area, as well.

Another option for the Henry's Lakes Mountains/Lionhead would be the creation of a Wildlife Management Area with similar management prescription as outlined in non-motorized Backcountry Area (BCA) and possible future legislation identical to the Cabin Creek Recreation and Wildlife Management Area.

Mountain Biking on Our Public Lands

As an avid cyclist, I have great appreciation and connection to The West end of the Custer-Gallatin Forest. Continued mountain bike access on areas that are currently allowed, the improvement of existing trails and the implementation of future trail projects in appropriate places benefits communities in so many ways. Mountain biking connects the youth of today and tomorrow to the land, making wild and remote locations accessible to a new generation of conservation-minded people and promotes trail stewardship.

Mountain biking, like other, quiet uses, is a" soft" impact that has become one of the conduits for the public for support public land and resistance to transferring them to state or private interests. In Montana, we are fortunate that much of our public lands are managed by the Forest Service, which has been favorable to preserving access and natural qualities. Quiet recreation can coexist with these values, if not promote environmental appreciation and preservation to a broader audience. Natural vistas, quiet solitude, conservation, and nature are all motivators and interests to cyclists who venture into the backcountry and forest in the Custer-Gallatin National Forest and especially to me. Bikes Belong.

Regards and thank you for providing this opportunity to participate in this important process,