Data Submitted (UTC 11): 5/1/2025 1:56:34 AM First name: Kyle Last name: Marvinney Organization: Title:

Comments: To whom it may concern,

While I support the goals of this project and many of the elements outlined within the scoping letter, this project represents a massive, missed opportunity by the Custer Gallatin National Forest to address growing recreation demand in the Gallatin Valley. Outdoor recreation has been growing steadily over recent decades (as has the population of the Gallatin Valley) and as noted in the scoping letter, Hyalite and South Cottonwood are heavily visited areas and are incredibly important to the communities within the Gallatin Valley and beyond. The Custer Gallatin's own Land Management plan, updated and revised just a few years ago (2022) repeatedly references the need to adapt recreation opportunities to changing recreation desires. There is good reason that the Forest would like to designate Hyalite as a "Recreation Emphasis Area". While work to mitigate wildfire hazards through thinning and prescribe fire are critically important for our municipal water supply that is sourced in Hyalite, the public benefit of recreation cannot be ignored. Sadly, this proposed project does ignore recreation. There is no "off season" for recreation in Hyalite. Winter provides a multitude of ski, snowshoe, and hiking options on groomed xc ski and ungroomed backcountry trails. As outlined in the scoping letter's map, some of the most popular groomed trails in Hyalite are within the commercial mechanical thinning units between the reservoir and the History Rock Trailhead. The Bozeman Ranger District, Friends of Hyalite, and Bridger Ski Foundation have invested a significant amount of time and resources over many years in these trails, as they

have good terrain, are easy to access, and hold snow well. Any logging and thinning activity in their vicinity needs to minimize its impact to the trails. The "Blackmore Loops" between History Rock and the Reservoir see daily use all winter long and represent the most accessible skiing in Hyalite. There needs to be protection for these trails in this project and implementation should not take place during the winter season.

Furthermore, backcountry downhill skiing has increased dramatically in popularity and accessibility. While Hyalite provides many great opportunities for backcountry skiing, the thick forest limits accessibility to this activity. A vegetation thinning project such as this could be a golden opportunity to create glade skiing where the forest was formerly too thick. Much of the area between the reservoir and the Langhor drainage is suitable ski terrain. Thinning in this area could create or improve ski opportunities while still meeting the forestry objectives of the project. A little collaboration with the recreation community could go a long way here in planning treatments that the ski community could support.

The generous road system in Hyalite allows for accessible dispersed camping, which is increasingly becoming non-recreational as people seek more affordable housing. A major concern with this project is that it will only create more dispersed camping opportunities that will be abused by those seeking to reside on the National Forest. There must be assurances that temporary roads will be properly decommissioned quickly and that access off of existing roads to potential campsites will be better controlled. It would be a good idea going forward to only allow camping in designated dispersed sites in the entire Langhor drainage.

The roads have also enabled unplanned and unsanctioned trail construction for mountain bikes that now see daily use during the summer and fall. These trails have exploded in popularity over the last few years as mountain biking has grown and riders have sought more challenging terrain. While the trails were constructed illegally and were relatively unknown, they now see daily use as they are close to town and the Langhor road system allows for "shuttle rides" where riders are driven to the tops of the trails and ride multiple laps downhill. There is clearly a demand for trails that are more challenging and more specific to mountain bikes close to Bozeman. Any vegetation project in this area should include, or be followed up with a project including, mountain bike trail development. Several of these trails have already been decommissioned once and they been rebuilt and expanded upon and will surely come back again after this project is complete unless the Forest makes a real effort to adopt or create new trails here. The Hyalite Recreation Emphasis Area as described in the 2022 Forest Management Plan states objectives of creating two new loop trails in the area over the life of the plan, either through new construction or adoption of user trails. Now is the time to do it.

While there is a definite need for wildfire preparedness in Hyalite and South Cottonwood, it is extremely

unfortunate that the Forest Service is choosing to pursue a project under a funding authority that does not allow for recreation improvements to be included in its scope, in an area it has designated as "Recreation Emphasis". Therefore, this project should either be replaced through a funding mechanism that does allow for recreation improvements or it needs to be followed up by a major, recreation project in the same area. Not doing so and continuing to ignore growing recreation demand fails the communities of the Gallatin Valley and fails to live up to the Forest's own goals and desired conditions outlined in the 2022 Forest Plan Revision. This would be the third major vegetation project in a row on this district that has not included any recreation improvements. This project as outlined in the scoping letter will disrupt recreation activities of all types throughout its implementation. It has the potential to create even more problematic, unplanned recreation that will eat up the Custer Gallatin National Forest's time and money for years to come. It also could be a golden chance to improve and create new recreation opportunities in Hyalite. Please consider that carefully. Sincerely,

Kyle Marvinney