



March 1, 2018

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Submitted online at  
<https://cara.ecosystem-management.org/Public/CommentInput?project=50185>

Re: Scoping comments on the CGNF Proposed Action

Dear Virginia and Forest Planning Team:

Thank you for the opportunity to comment on the Proposed Action for the Custer Gallatin forest plan revision. These comments are submitted on behalf of Outdoor Alliance Montana, a coalition of national and Montana-based advocacy organizations that includes Southwest Montana Climbers Coalition, Montana Backcountry Alliance, Southwest Montana Mountain Bike Association, Western Montana Climbers Coalition, Mountain Bike Missoula, Winter Wildlands Alliance, International Mountain Bicycling Association, American Whitewater, and the American Alpine Club. Our members visit the Custer Gallatin National Forest (CGNF) to hike, mountain bike, fat-tire bike, paddle, climb, backcountry ski, cross-country ski, and snowshoe. Access to, and preservation of, these recreational activities is very important to our membership and we appreciate that the Proposed Action recognizes role that recreation plays on the forests. However, the Proposed Action makes no mention of fat-tire biking, whitewater paddling, or canoeing. We ask that this omission be corrected, as these are all activities that are popular and wide-spread on the forest. During the pre-scoping process, we provided GIS data detailing important human-powered recreation areas and we hope that the Forest Service will use that data to inform this planning process. In addition, we are always open to meeting with the recreation and forest planners to discuss recreation-related management and concerns.

The 2012 Planning Rule aims to balance multiple uses, including recreation, with the restoration and maintenance of forest and water ecosystems. To do so, revised forest plans must include plan components that address sustainable recreation, including recreation settings, opportunities, and access; and scenic character.<sup>1</sup> These plan components should take into account the outdoor recreation economy and opportunities to connect people with nature. Of course, all of these elements are interrelated. As people connect with nature through recreation, they contribute to the outdoor recreation economy and the protection of natural resources is integral to the sustainability of recreation opportunities. Therefore, protecting the CGNF's natural resources and environment is an essential element of sustaining the region's outdoor recreation economy.

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<sup>1</sup> (36 CFR 219.10 (b)(1)(i)).



While the Proposed Action includes many commendable elements, we identify several crucial omissions below, as well as the imperative of more thoroughly integrating elements contained in the plans. As elaborated below, the Forest Service must:

- Support sustainable recreation more thoroughly with required plan components;
- Integrate plan components across planning focus areas, including through better use of the Recreation Opportunity Spectrum (ROS);
- Support ROS settings with required plan components; and
- Support Recreation Emphasis Areas with additional and area-specific plan components to ensure appropriately focused management for these areas

#### **I. Sustainable Recreation and Integration**

We appreciate that the 2012 Planning Rule includes a new focus on sustainable recreation, and we support the language in the Proposed Action that addresses this topic. We also appreciate that the Proposed Action specifically mentions that the CGNF provides important opportunities for activities such as backcountry skiing, rock and ice climbing, mountain biking, and whitewater rafting.

According to a recently released Bureau of Economic Analysis report, outdoor recreation accounts for 2% (\$373.7 billion) of the nation's GDP in 2016 and this sector of the economy is growing 1% faster than the US economy overall.<sup>2</sup> In Montana, spending on outdoor recreation (\$7.1 billion) exceeds the value of statewide agricultural crop, livestock, and poultry products sold (\$4.3 billion).<sup>3</sup> The CGNF supports this robust outdoor recreation economy for many of the gateway communities bordering the forest. Recreation is the path through which most people experience national forests and it is essential that management for, and impacts to, recreation be at the forefront of forest planning. Historically, with the exception of a few focused areas, recreation has been treated as an afterthought – a side benefit of national forest lands after timber, grazing, mineral development, and fire management. However, recreation on our national forests doesn't occur in just a few focused areas. The growth in recreation, particularly dispersed recreation, means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest.

The forest plan should showcase the CGNF's niche. The CGNF is unique for supporting a mix of world-class outdoor recreation with intact and globally rare wildlife populations, all of which depend on the forest's undeveloped and connected landscapes. The CGNF is a core piece of the Greater Yellowstone Ecosystem, the value of which cannot be understated. To help the Forest Service better understand recreation resources on the forest, we previously provided a geodatabase containing data for climbing locations, mountain bike trails, popular backcountry ski zones, and whitewater runs on the CGNF. We hope that if the Forest Service understands

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<sup>2</sup> Bureau of Economic Analysis, Outdoor Recreation Satellite Account. Available at <https://www.bea.gov/outdoor-recreation/>

<sup>3</sup> Outdoor Industry Association – Montana's Outdoor Recreation Economy. Available at [https://outdoorindustry.org/wp-content/uploads/2017/07/OIA\\_RecEcoState\\_MT.pdf](https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_MT.pdf)



how the public currently recreates on the CGNF, it will be better equipped to manage these uses while also protecting and preserving wildlife and wildlife habitat on the forest.

Backcountry skiing, climbing, paddling, and mountain biking are all activities with rapidly growing participation rates. According to the Outdoor Foundation's 2017 participation report<sup>4</sup>, bicycling, hiking, and backpacking are among the most popular outdoor activities for both adults and children. Likewise, cross country skiing and traditional/ice climbing are among the fastest-growing outdoor activities, seeing 13% and 6% growth over the past three years, respectively. These activities draw people to the CGNF from near and far. Growth in outdoor recreation is encouraging because we see more people invested in caring about the places that provide these recreational experiences. At the same time, this growth brings a new urgency to the need to manage for sustainable recreation. With sustainable recreation management, we can ensure that the CGNF provides opportunities for the recreating public to appreciate and enjoy public lands while at the same time ensuring that this enjoyment does not degrade the natural environment.

The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.<sup>5</sup> To meet this requirement, the CGNF plan must include sustainable recreation plan components, including standards and guidelines (not just desired conditions) that are integrated with plan components related to other uses. In addition to aligning recreation management actions with the recreation opportunity spectrum, the Forest Service must integrate management actions for other multiple uses – such as timber or grazing – and sustainable recreation. The Forest Service should use the Recreation Opportunity Spectrum (ROS) to integrate sustainable recreation and other elements of forest management. While we are pleased to see the Proposed Action mention sustainable recreation, for the most part it does so only in passing, giving the impression that sustainable recreation management would be a nice addition to what the Forest Plan hopes to accomplish rather than an integral part of the plan itself.

One way to better integrate plan components would be for the draft EIS to explain how management direction across the forest, for each use, fits within the ROS setting for any particular area. The Proposed Action provides a good foundation for this by elaborating on the different settings and characteristics for each ROS category and by providing a different ROS for summer versus winter. Now the Forest Service needs to consider how ROS interplays with the non-recreation focused parts of the plan.

To address the concerns and comments we outlined above, we suggest the following additional desired conditions for General Recreation (FW-DC-REC):

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<sup>4</sup> Outdoor Foundation. 2017. Outdoor Recreation Participation Topline Report. Available at [https://outdoorindustry.org/wp-content/uploads/2017/05/2017-Topline-Report\\_FINAL1.pdf](https://outdoorindustry.org/wp-content/uploads/2017/05/2017-Topline-Report_FINAL1.pdf)

<sup>5</sup> 36 C.F.R. § 219.10(a)



- **06** Non-motorized recreation is promoted, allowed, and welcomed across the Forest in places where it is sustainable, through the activities that are sustainable, and to the extent that it is sustainable.
- **07** Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
- **08** The landscape is generally natural appearing and often includes historic or cultural features.
- **09** A full range of recreation settings is available, ranging from unroaded and challenging “backcountry” areas to roaded “frontcountry” settings which are easily traveled and convenient for connecting communities to the forest.
- **10** Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.
- **11** Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.
- **12** Rivers and streams provide exceptional non-motorized boating, fishing, and swimming opportunities featuring excellent water quality, intact riparian corridors, and opportunities to observe native biodiversity.
- **13** Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.

We understand that long-range plans cannot dive too deeply into tactical prescriptions, but there is little in the plans that *specifically* describes what steps the Forest Service will take to achieve these desired conditions. In order to be effective, Desired Conditions must be supported with other required plan components, including specific standards and guidelines. Without a full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path towards achieving the desired conditions. Therefore, we suggest the following additional plan components for General Recreation:

#### **Standards (FW-STAND-REC)**

- **01** Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.
- **02** Foot travel, including skiing, is allowed for cross-country travel unless area is administratively closed to public access.
- **03** Non-motorized boating, wading, and swimming is allowed on all water bodies, rivers, and stream reaches, unless area is administratively closed to public access.
- **04** Rock climbing is a legitimate wilderness and non-wilderness activity, as is the conditional use of fixed climbing anchors as appropriate.



- **05** Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.
- **06** Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.
- **07** When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.

#### **Guidelines (FW-GDL-REC)**

- **01** Front-country areas provide initial contact points for forest users and developed recreation settings where people can engage in a variety of recreation activities including scenic driving, rock climbing, hiking, camping, picnicking, fishing, and boating.
- **02** Backcountry areas are mostly undeveloped places where people engage in a variety of human-powered recreation activities and some motorized recreation, pursuant to the ROS. Visitors rely on their outdoor skills and self-reliance as they engage in recreation activities.
- **03** Main access corridors to Forest Service lands and contact points such as developed trailheads and observation points have information available and provide a transition and orientation place for forest users as they enter back-country areas. Visitor use in these areas is moderate and disperses from these points.
- **04** The Forest Service will work with local and national partners to educate users on best practices for reducing conflict and to sign shared use trails with information on trail etiquette and to promote responsible behavior.
- **05** Wherever possible, the Forest Service will prioritize the development of partnerships with non-profit organizations and local government entities whose missions complement the Forest Service's mission and desired objectives.
- **06** The Forest Service should coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.

We also suggest changing the following plan component in the Dispersed Recreation section of the plan to be more inclusive of the variety of dispersed recreation opportunities the CGNF provides:

- FW-DC-RECDISP 04 Diverse opportunities exist for **a wide range of dispersed recreation activities** on Forest lands.

We understand the need for certain areas of National Forest lands to be closed temporarily, or in rare occasions, on a permanent basis. Typically, the need for closure is due to safety or ecological issues that cannot be mitigated. In the instances above where we outline a condition or standard "unless the area is administratively closed to public access," we recommend that



anytime the USFS contemplates a new closure, the agency consult with stakeholders who have a particular interest in the area that is being considered for closure. We also recommend that the agency review all closures on a periodic basis to determine whether they continue to be appropriate.

Finally, in addition to the plan components we suggest above, which are directly related to recreation and/or the Recreation Opportunity Spectrum, we suggest additional plan components for other elements of the forest plan, which also relate to recreation management as follows:

#### Roads and Trails

- **FW-DC-RT 05** The transportation system is sustainably constructed and maintained so that it does not result in negative impacts to forest resources.
- **FW-DC-RT 06** The transportation system is right-sized to fit the Custer Gallatin maintenance budget.

#### Facilities

- **FW-DC-FAC 04** Facilities are constructed in accordance with the Recreation Opportunity Spectrum.

#### Continental Divide National Scenic Trail

- **MG-DC-CDNST 08** Management of the CDNST complies with the CDNST Comprehensive Plan

## **II. Gallatin Forest Partnership Agreement**

Several Outdoor Alliance Montana member organizations are members of the Gallatin Forest Partnership and OAMT supports the Gallatin Forest Partnership Agreement. We ask that the Forest Planning team consider the Gallatin Forest Partnership recommendations as an alternative in the development of its Draft Environmental Impact Statement.

The Gallatin Forest Partnership (GFP) Agreement protects habitat connectivity and quality and balances a wide diversity of recreation uses across the Gallatin and Madison ranges. We have recommended over 124,000 acres of land for Wilderness and ask that these places be managed for foot and stock travel only. Our agreement also recommends two Wildlife Management Areas – West Pine and Porcupine Buffalo Horn – where existing recreation uses would continue per the 2006 travel plan but where wildlife management would take priority. In addition, we recommend expanding mountain bike opportunities in the West Pine area. And, our agreement seeks to protect Bozeman’s water supply by designating the Hyalite and Bozeman Creek watersheds as the Hyalite Watershed Protection Area. We believe this designation and the management we describe in the GFP Agreement will give the Forest Service flexibility and options for protecting this important watershed while recognizing and managing the high level of recreation use the area receives.

The GFP Agreement represents the first agreement diverse stakeholders have ever reached around how to manage the Hyalite Porcupine Buffalo Horn Wilderness Study Area and provides



recommendations for the larger Gallatin and Madison ranges as well. We hope that the Forest Service will incorporate our recommendations into the forest plan.

### III. Recreation Emphasis Areas

We are very supportive of the Recreation Emphasis Area concept as a management tool and believe the Forest Service is on the right track in this regard in the Proposed Action. The Recreation Emphasis Areas outlined in the Proposed Action cover most of the places where we feel this designation is appropriate; however, we believe the CGNF should include a portion of the Bridger Range as an additional Recreation Emphasis Area. Specifically, this Recreation Emphasis Area should encompass the west side of the Bridgers from the M trailhead to Corbly Gulch and wrap up and over the Bridger Ridge to include everything from the Fairy Lake area to Bridger Bowl.

Designating Recreation Emphasis Areas is a way for the forest plan to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable – both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. To this end, we suggest the following additional plan components for this designation:

- **FW-DC-REA 06** Places of special recreational significance are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support. Examples include climbing areas, backcountry skiing, or paddling destinations, and trails recognized as exemplary for mountain biking or hiking.
- **FW-GDL-REA 02** Fire management within Recreation Emphasis Areas should strive to protect and preserve recreation infrastructure.
- **FW-GDL-REA 03** The Forest Service should work with local and national partners to maintain and develop the recreation infrastructure (campgrounds, trails, river access sites, climbing anchors, and winter trailheads) necessary for the public to access and enjoy Recreation Emphasis Areas.

In addition to these general plan components, the forest plan should include specific components (desired conditions, goals, etc.) for each Recreation Emphasis Area. For example, for the Gallatin Canyon Recreation Emphasis Area, we suggest the following plan components based on our recommendations in the GFP Agreement:

#### Goals

- The Gallatin Canyon provides quality year-round recreation opportunities for those seeking a wide range of experiences on the National Forest.
- The Custer Gallatin shall strive to maintain a geospatial dataset, a library of guidebooks, an awareness, and a network of informed partners relating to Gallatin Canyon.



### Desired Conditions

- Manage the Gallatin Canyon Recreation Emphasis Area to promote, enhance and balance opportunities for managed camping, fishing, whitewater paddling, rock climbing, hiking, and sightseeing while protecting the area's unique natural ecosystem and scenic integrity.

### Objectives

- As recreational use increases in the Gallatin Corridor Day Use Area, manage heavily used trailheads with conflicting uses through shared trails agreements such as those currently in place for heavily used trails in the northern Gallatin Range.
- Regularly maintain high usage trailhead access points and facilities, including trash pickup, toilet cleaning and resupply, road repair (top dress, fill potholes, grading), and public notice updates.
- Where feasible (given land available and other limitations), expand parking and provide turnaround for trailer rigs at trailhead locations.
- Increase enforcement efforts to ensure that recreational use is confined to those routes and areas where it is allowed.
- Develop partnerships with non-governmental organizations to increase maintenance, awareness, monitoring, and education with volunteers within the Gallatin Corridor Day Use Area. Consider hiring a "Gallatin River Ambassador" and instituting a "Respect the River" program over the summer season.
- Decrease sedimentation from trails, roads and river access points along the Gallatin River corridor.

### Standards

- Strive to use natural or natural-appearing materials when constructing trails, steps, bridges, and other recreational infrastructure.
- Trails that traverse or approach sensitive environmental areas shall be sited, designed, and monitored to ensure those trails are not unsustainably impacting biological resources.
- Existing trails should be inventoried and signed to clarify which trails are open and which trails are closed.
- Harden access sites and boat ramps as needed; add education, stewardship and interpretive information (e.g. Lava Lake/35 mph Bridge area).

### Guidelines

- While many trails should be suitable for the average user, trails will be designed and maintained to provide a range of desired challenges to various user groups.
- The Forest Service encourages responsible behavior that promotes and/or avoids compromising the safety of trail users.
- Access trails for climbing areas are maintained in partnership with local stakeholder groups.



- With appropriate partner organizations, climbing anchors and bolts are maintained to ensure user safety.

Finally, because Hyalite is both a recreation emphasis area and a municipal watershed we feel that it is very important to consider how to protect the watershed while managing recreation in this area. In addition to incorporating the plan components we've suggested in the GFP agreement, we suggest amending **MG-GO-WTR 01** as follows: The Forest Service cooperates with the city of Bozeman in *sustainable land management of the Hyalite and Bozeman Creek municipal watersheds*.

#### **IV. Buffalo Horn Backcountry Area**

We appreciate that the Proposed Action recognizes the value of this area for recreation. Please refer to the Gallatin Forest Partnership Agreement for suggested plan components to better manage this area and balance recreation uses with wildlife habitat protection.

#### **V. Designated and Recommended Wilderness**

In reviewing the Proposed Action, we were struck by plan components related to commercial still photography and filming within recommended and designated Wilderness. While we do not think that most forms of commercial photography or filming are appropriate in designated Wilderness, the management of this use as described in the Proposed Action seems to willfully ignore reality. One has only to pick up a calendar, stroll through an art gallery featuring landscape photos, or flip through the pages of any magazine catering to outdoor recreation interests to recognize that commercial still photography frequently occurs within designated and recommended Wilderness areas.

We suggest changing FW-STD-WILD 10 and FW-STD-RWA 6 to:

- **FW-STD- WILD 10** Opportunities for new commercial still photography or filming may be considered so long as this activity does not conflict with or detract from desired conditions.
- **FW-STD-RWA 6** Opportunities for new commercial still photography or filming may be considered so long as this activity does not conflict with or detract from desired conditions.

Based on FSH 2701.11-2010-2 (CH 40) we suggest adding an additional guideline for designated and recommended Wilderness management as follows:

- **FW-GDL-WILD 04** A special use permit may be issued for commercial photography or filming in Designated Wilderness if the activity is wilderness-dependent, an appropriate non-wilderness substitute does not exist, and the activity would not involve the use of any motorized equipment or mechanical transport.
- **FW-GDL-RWA 03** A special use permit may be issued for commercial photography or filming in Designated Wilderness if the activity is wilderness-dependent, an appropriate non-wilderness substitute does not exist, and the activity would not involve the use of any motorized equipment or mechanical transport.



## VI. Conclusion

Outdoor Alliance Montana strongly supports the 2012 Planning Rule and our national partners are heavily invested in its success on the ground. We have invested, and will continue to invest, significant energy into ensuring that the Custer Gallatin's revised forest plan successfully integrates sustainable recreation management, promotes partnership opportunities, and protects and conserves forest resources. This forest contains world-class recreational resources, unique and important natural features, and is a destination for millions of visitors each year. Much is at stake in this revised plan and we want to help ensure that it is robust, sustainable, and able to adapt to whatever changes the next 20 years may bring. We appreciate the opportunity to provide comments and we look forward to continuing this conversation.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen", with a stylized flourish at the end.

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