



Outdoor Alliance Montana is 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 (Montana Section). 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. In addition, an important aspect of the recreational experience on the Gallatin – what makes this forest truly unique – is sharing this landscape with a full suite of native species. Sustainably managing recreation in balance with conserving wildlife and undeveloped landscapes on the Custer Gallatin is at the core of our vision for the future of this forest.

This document outlines our broad vision for the forest – specifically focusing on special designations and other “map-based” ideas.

## **I. 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 part of the preferred 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. The agreement recommends more than 124,000 acres of land for wilderness, as well as 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. The agreement also 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.

## **I. Designated and Recommended Wilderness**

Designated Wilderness is an important recreational resource on the Custer Gallatin. Hikers, trail runners, backpackers, backcountry skiers, cross-country skiers, snowshoers, paddlers, climbers, and more all recreate within and highly value designated Wilderness areas. The unconfined, primitive, recreation experience that Wilderness provides is highly desirable to



human-powered recreationists. In addition to the proposed Wilderness included in the Gallatin Partnership Agreement (Cowboy Heaven, Taylor Hilgard, and the Gallatin Crest, including the Sawtooth portion of the Gallatin Range), we support recommending Wilderness for the following additional areas:

- Line Creek Plateau (AB)
- Red Lodge Creek- Hell Roaring (AB)
- Mystic Lake (AB)
- Republic Mountain (AB)
- Chico-Emigrant (AB)<sup>1</sup>
- Lost Water Canyon (Pryors)

With the exception of Lost Water Canyon, these areas are particularly important for backcountry skiers and winter mountaineers. Lost Water Canyon is highly valued by hikers and includes exceptional cultural values.

## **II. Backcountry Areas**

There are some areas of the Custer Gallatin that are valued for human powered recreation and which require more flexible management than under recommended Wilderness in order to maintain recreational opportunities. There are three areas in particular (two of which are encompassed by the GFP Agreement) where it is essential that access to high-quality mountain biking opportunities be preserved: the Lionhead, Porcupine-Buffalo Horn, and the northeast portion of the WSA (West Pine). We strongly support a non-motorized Backcountry Area designation for these areas.

We ask that the Forest Service designate these areas as non-motorized Backcountry Areas, with a Recreation Opportunity Spectrum setting of Semi-Primitive Non-Motorized (year-round). Lionhead, in particular, has remote, natural, difficult terrain that is valued by hikers, mountain bikers, and backcountry skiers. To maintain the existing characteristics of the area we do not want to see trail development expanded beyond the existing footprint. For this reason, the Forest Supervisor should issue a special order within one year of Forest Plan completion stating that within the Lionhead, no new trails should be constructed. This non-motorized Backcountry Area designation will protect the non-motorized, wild experience and wildlife habitat values in the Lionhead while continuing to allow mountain bike use where it is currently established in this invaluable area.

The Gallatin Forest Partnership Agreement includes recommendations for managing the West Pine and Porcupine-Buffalo Horn Backcountry Areas, and we are supportive of these recommendations. There may be other Backcountry Area designations that the Custer Gallatin deems appropriate elsewhere on the forest, such as in the Pryors or on the Ashland district. We are less familiar with these areas and defer to those with expertise on these areas of the forest.

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<sup>1</sup> We propose a Chico-Emigrant RWA boundary as mapped in Attachment A



### **III. Wild and Scenic Rivers**

In addition to the 31 streams found to be Wild and Scenic eligible in the Proposed Action, which we strongly support, we advocate that the Forest add the following six streams to its eligibility inventory. They are all free-flowing, possess at least one ORVs, and are conservation priorities for the paddling community:

- Bear Creek, Absaroka Mountains
- Buffalo Creek, Absaroka Mountains
- Hellroaring Creek, Absaroka Mountains
- Porcupine Creek, Gallatin Range
- Hyalite Creek, Gallatin Range
- South Fork Madison River, Hebgen Basin
- Taylor Fork River, Madison Mountains
- Sweetgrass Creek, Crazy Mountains

Hyalite and Sweetgrass Creeks are of particular importance to the whitewater paddling community. Hyalite Creek is Bozeman's backyard creek run, offering paddlers seasonal road-accessible Class IV creek boating which is a regional rarity. The Custer Gallatin recognizes the outstanding recreational values of the upper portions of Hyalite in the proposed action, and for paddlers these values are exemplified on the lower reach between the reservoir and the Forest Service boundary as well. We ask that the Forests consider a recreation ORV for this reach.

Sweetgrass Creek is the largest stream in the Crazy Mountains and possesses extraordinary scenic values. We recognize that Big Timber Creek is vastly more popular and also exemplary. We feel however that finding two streams eligible in the spectacular Crazies is more than justified, and we ask that the Forest Service give Sweetgrass additional consideration for eligibility based on a scenery ORV.

### **IV. 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 based on what we've seen of the Conceptual Draft Alternatives released this past summer. We are supportive of all 12 Recreation Emphasis Areas listed in Conceptual Draft Alternative E.

- Main Fork Rock Creek (AB)
- Cooke City (AB)
- Main Boulder River (AB)
- Yellowstone River Corridor (AB)
- Hyalite (Madison, Gallatin, Henrys Lake Mountains)
- Gallatin Canyon (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Winter (Madison, Gallatin, Henrys Lake Mountains)
- Hebgen Lakeshore (Madison, Gallatin, Henrys Lake Mountains)
- West Fork Rock Creek/Red Lodge Mountain Ski Area (AB)



- M area (Bridger, Bangtail, Crazy Mountains)
- Bridger Bowl Ski Area – we propose modifying to *Bridger Bowl Ski Area/Northern Bridgers* (Bridger, Bangtail, Crazy Mountains) and expanding this area north to the Fairy Lake basin.
- Storm Castle (Madison, Gallatin, Henrys Lake Mountains)

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, each Recreation Emphasis Area designation should be accompanied by specific plan components that are unique to each area that will guide sustainable recreation management.

Several of these recreation emphasis areas include recreation resources that are very important to our constituents. For example, Hyalite and Gallatin Canyon are home to some of the best climbing in Southwest Montana. Hyalite is world-renowned for its high concentration of naturally-occurring waterfall ice and climbers were instrumental in securing winter access to Hyalite Canyon. Gallatin Canyon is home to a high concentration of bolted and traditionally protected rock climbs of all grades. Cooke City, Red Lodge Mountain, and Bridger Bowl are all major destinations for winter recreationists. The Bridger Bowl Recreation Emphasis Area should be expanded north to Fairy Lake, as this entire area receives high levels recreation use. In addition, because of increased winter backcountry recreation and ongoing issues with enforcement of the current travel plan designations in the Northern Bridgers, the revised forest plan should include direction to the Forest Service to re-visit winter travel management in the Northern Bridgers. Finally, the West Fork of Rock Creek, Main Fork of Rock Creek, Boulder River Corridor, and Yellowstone River Corridor are all extremely important to paddlers. These 4 corridors provide everything from expert-level whitewater paddling to family canoe opportunities.

## **V. Wildlife Management**

To address the public's concerns about recreation impacts to wildlife, we propose that the Forest Service monitor wildlife populations across the forest and adapt recreation management as necessary to protect wildlife populations. Management strategies may include (but are not limited to) limiting use during periods where wildlife are vulnerable such as elk calving in the spring or wolverine denning mid-winter, restrictions on dispersed camping or other uses, and permit systems in heavily visited areas. Any necessary management prescriptions or use limitations should be equitably applied across user groups.

## **VI. Conclusion**

The communities surrounding the Custer Gallatin, particularly Bozeman, are among the fastest-growing in the nation and people are moving to this region in large part because of public lands



and the outdoor recreation opportunities they provide. The Custer Gallatin currently provides phenomenal outdoor recreation opportunities in balance with a healthy ecosystem and thriving wildlife populations. Maintaining this balance into the future, under stressors ranging from climate change to human population growth, will be a challenge but is fully achievable with thoughtful and proactive planning. This is an opportune time to revise the forest plan and we look forward to continuing to be a full partner in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen". The signature is fluid and cursive, with a large initial "H" and "E".

Hilary Eisen  
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**On behalf of the following organizations**

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