

December 16, 2012

Forest Supervisor Brazell
Forest Planners

This comment note is the official comment from the Montana Mountain Bike Alliance for the December 3 planning session that addressed the following topics:

Land Resources

Infrastructure Resources

The following statement from the Montana Mountain Bike Alliance covers our comments on Lands Resources.

Bicycles in the present form have existed since 1885. Bicycle use in the Rockies can be traced to everyday transportation in every town, mining and timber camp. During the 1890's the Helena Bicycle Club and the Laramie Bicycle Club explored Yellowstone Park by bicycle. A few years later soldiers from Fort Missoula bicycled all the way to Yellowstone Park. Vagabond travelers used bicycles for decades, and still do. Mountain bicycling was a "green" activity that predated motor vehicle use! With the development of modern mountain bikes in the 1970's, people started to quietly explore their surroundings, testing the limits of the bikes and their ever-increasing fitness. The earliest known modern cyclists from Superior and Missoula started exploring the Great Burn area in 1981, perhaps even earlier. Over thirty years of modern cycling history exists in the Great Burn area. Cycling existed in the Great Burn area at a time when cycling was allowed in Wilderness Areas. The present Clearwater National Forest Plan, which is under review, allows bicycling in B2 Recommended Wilderness Areas.

The recently approved Clearwater Travel Plan of 2011 barely addresses bicycling in the Great Burn. Misconceptions include the assertion that bicycles were not developed enough by 1988 to negotiate the terrain of the Great Burn, and the notion that bicycling takes place off of trails. Based on these speculations, and a new Regional Policy that prohibits bicycling in all Recommended Wilderness Areas, bicycling was eliminated in the Great Burn Recommended Wilderness as part of the final Travel Plan Decision.

Travel Planning is geared almost solely for management of motorized activities. Travel Planning selects the appropriate areas and trails for certain motorized activities. New to the travel planning process is the prohibition of bicycling in Recommended Wilderness Areas. The plan capriciously prohibited bicycles from Recommended Wilderness Areas because the known information and cycling impacts did not merit the action of prohibition.

Why wasn't science and hard data used to manage bicycling in Recommended Wilderness management areas? If these activities are found to be of no impact, then perhaps it is time to actually look at adjusting the Recommended Wilderness boundary to reflect historical use. Forest Planning Process is the appropriate tool to make boundary adjustments of special lands or areas. The highest and best use of certain National Forest lands can often be Wilderness, however Wilderness designation must correspond to historical uses with appropriate corridors and boundary adjustments. The final example of these adjustments is evident on the inventory of the National Wilderness Preservation System. Hundreds of corridors are visible on Wilderness maps, and it is easy speculation to realize that many boundary adjustments were likely made as well to arrive at the shape of these areas. The first step of Clearwater National Forest land managers is to modify the shape of the Great Burn to reflect actual historical use.

Over time, bicyclists have traveled almost all of the Great Burn Trails. The State Line Trail has been the key corridor for bicycling outings and access. Often said is the remark, "where else can one ride 28 miles and go by 28 high mountain lakes". Truly the State Line Trail is a treasure. However the whole Great Burn is a special area, both in administrative designation, geography, and heritage. The Montana Mountain Bike Alliance can appreciate the efforts of advocates to preserve it. But facts must not be ignored. Bicycles have traveled most trails in the Great Burn, but certain locations have been traveled more frequently and other locations and trails much less so.

Frequently bicycled routes are narrowed down to 2 areas and a connector. One is upper Kelly Creek and Kid Lake, as accessed from Schley Saddle in Montana. For decades the road leading up to Schley has been a jumping off point for bicycling and snowmobiling. The other most frequently bicycled routes in the area have been all of the trails extending east from Hoodoo Pass to Goose Creek trail # 414. Primary access to Goose Creek and other trails is Trail #738. Connecting the two areas is the great State Line Trail #738 extending from Hoodoo Pass to Schley and Kid Lake, passing the mentioned 28 lakes. This connector has typically been a route for two or three-day horse-supported bicycle rides.

Historical allowed quiet use is appropriate within the Great Burn. Clearly some parts of the Great Burn are not appropriate to remain as Recommended Wilderness. Since Region One is locked in to a restrictive management policy for Recommended Wilderness, bicyclists must advocate for common sense boundary adjustments to the area for the most important and treasured destinations. The Forest Planning process is where special areas such as Recommended Wilderness are created and modified. In the absence of true bicycling data and understanding, those same officials must start by examining the comments submitted from bicyclists, some of whom have been riding these trails for over 30 years. The Montana Mountain Bike Alliance strongly recommends adjusting the western boundary of the Great Burn back to the east side of Goose Creek trail #414. We also clarify that Trail #738 be removed from Recommended Wilderness from Hoodoo Pass to Goose Creek. We think that a corridor for Trail #738 from Goose Lake to Kid Lake deserves a robust discussion with cyclists at

the table. We also recommend that trail #567 be adjusted to show a corridor in the areas of upper Kelly Creek, or adjusted as a snowmobile area as this zone has historically been. We also very strongly recommend that any lands removed from B2 Recommended Wilderness status be made into C8S management area additions.

The newest trend of Congress using companion designations along with Wilderness to protect wild lands depends in large part in the Forest Service listening to the public and taking the data submitted to form a more accurate picture of how lands have been used and should be managed. Sometimes this means defining corridors, and adjusting boundaries, shrinking some and expanding others. The trend of using Wilderness and companion designations in concert depends upon diverse groups working together to find common ground and solutions to land preservation. The first step of this political process is dependent upon an accurate Forest Plan. If the Forest Plan is flawed or biased, problems will surface later on in the legislation process. The Montana Mountain Bike Alliance implores the Forest Planners to create a better and more accurate Forest Plan by adjusting parts of the Great Burn Recommended Wilderness boundary in order to reflect historical allowed uses.

Although the Great Burn is Recommended Wilderness and Forest Plan direction has trended toward that management, decisions must be made using actual data about an areas use. Appropriate adjustments will achieve big gains in public support for future designations. In the absence of hard data please find attached a group of historical bicycling pictures from the Great Burn.

The Montana Mountain Bike Alliance has no comments regarding Forest Infrastructure Resources.

The Montana Mountain Bike Alliance will provide input on other Planning Topics in the future.

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