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**DELIVERED ELECTRONICALLY**

**SUBJECT: DRAFT DESIRED CONDITIONS COMMENTS; FOREST PLAN REVISION**

**HELENA AND LEWIS & CLARK NATIONAL FORESTS**

Dear Ms. Van Genderen:

On behalf of the Montana Bicycle Guild, Inc. ("MBG"), I would like to extend my sincere appreciation to you for accepting our comments on the draft desired conditions for the Helena and Lewis & Clark National Forests ("HLCNF"). In accordance with the directions provided by the HLCNF, I am pleased to submit to you MBG's desired conditions comments. In addition, please also find attached as "Exhibit A" the various comments received by the MBG at its December 10, 2015 meeting, which was hosted as a public event to discuss these draft desired conditions. Please consider these additional comments as the HLCNF works on finalizing the Desired Conditions document for the upcoming Forest Plan.

The MBG looks forward to working with you in the coming months and years as the new Forest Plan is developed and implemented. Please do not hesitate to contact me with any further questions, comments or concerns you may have relative to these comments.

**I. INTRODUCTION AND GENERAL THEME OF MOUNTAIN BIKING IN THE HLCNF AS IT RELATES TO THESE COMMENTS.**

As a constant theme to these comments, it is important to recognize the steady growth and popularity of mountain biking in the HLCNF and its positive effects on its local residents. Mountain biking has had, and continues to have, a positive social impact on the people who call this area home: the lifestyle it provides increases the well-being and health of local residents. At the same time, the economic impact that mountain biking has had in the

HLCNF has been very positive for local residents and businesses – not only with regards to increased tourism, but also with regards to businesses and individuals relocating to the area due to the great mountain biking opportunities that are present in the HLCNF. The non-exhaustive list of positive impacts from mountain biking addressed herein creates the general theme – or “distinctive roles and contributions” – which should serve as the basis and motivation for promoting the expansion of HLCNF’s trail systems. See 36 C.F.R. § 219.2(b) (2015).

With this in mind, the history and growing impact of mountain biking in the HLCNF warrants review and discussion. Next, specific comments relating to the chapters, parts and sections of the Desired Conditions document are provided. Due to the unique circumstances of mountain biking in the HLCNF, the MBG respectfully requests consideration of the following items as they relate to each and every desired condition – whether addressed or unaddressed in this document – and also with regards to how it relates to the comments contained herein.

#### **A. History and a growing trend of mountain biking in the HLCNF.**

Mountain biking in the HLCNF has certainly not always been as popular as it is today. It was certainly not a major factor – let alone one that would have garnered consideration – when the last Forest Plan was adopted in 1986. It was only due to the collective actions of many different individuals and groups over many years that allowed for the present unique circumstances to exist; not all of which can be recognized in these comments.

In 1996, voters passed a \$5 million bond for the City of Helena Open Space. Among several area projects, the bond committee began looking at acquisitions on Mount Ascension to link residential areas to HLCNF land farther up into the mountains. The effect of these acquisitions was summarized in a recent article from the Helena Independent Record:

[In 1996, ownership] on Mount Ascension included 14 lots ranging from 10 to nearly 60 acres in size. The city, along with Prickly Pear [Land Trust], initially worked to acquire three of those lots before the city open space bond was exhausted on Mount Ascension and other area projects, [Brad] Langsather said. . . . [Through the Prickly Pear’s efforts,] we now have two natural parks nearly equal in size. From a city of Helena Parks’ perspective, that’s going to lessen the pressure on Mount Helena because it gives people another option for where to base their recreation activities.” [The money used to pay for these acquisitions is well spent] when considering the economic benefit Helena realizes from its trails and open lands as well as the education, health and exercise opportunities they provide. . . .

“There’s the overarching quality of life for people who live here, and we know there’s a direct correlation between health and wellness from time outside,” [Marry Hollow] said. “Other cities would frankly kill for this opportunity we have here.” Mount Ascension Natural Park and its growing trail system offering long and short routes has seen an uptick in use as it has grown. The city trail system, through partnerships and pursuing grants, has stayed relatively inexpensive to maintain without increasing the tax burden, Langsather said.

“If you think about an interesting watermark, it’s achieving a natural park equivalent in size to Mount Helena, which is one of the largest in the nation,” he said. “So one city has two of the largest natural parks in the nation – I think that’s huge. As much as both get used, they’re both obviously needed.”

Tom Kuglin, *A Link Unbroken: City Land Acquisitions Mean Mount Ascension Won’t Be Developed*, Helena I.R. (Dec. 20, 2015), available at: [http://helenair.com/news/natural-resources/a-link-unbroken-city-land-acquisitions-mean-mount-ascension-won/article\\_dc8a4719-7292-5934-ab81-265131bd1f73.html](http://helenair.com/news/natural-resources/a-link-unbroken-city-land-acquisitions-mean-mount-ascension-won/article_dc8a4719-7292-5934-ab81-265131bd1f73.html) (emphasis added).

Accordingly, these acquisitions allowed for the uninterrupted flow of trails between the city of Helena and its bordering HLCNF lands. The growing popularity of mountain biking – both around the country and within Montana – similarly allowed for mountain bikers to access trails within the HLCNF directly from the city of Helena.

It is important to recognize another crucial factor which helped to make the area a destination for mountain bikers: the unique soil and climate found in the HLCNF.

[The area encompassing the HLCNF] is rideable for the majority of the year. Due to Helena’s location on the east side of the Continental Divide and the exposed nature of the South Hills, the singletrack here dries out very early in the year, and stays rideable very late. According to Patrick Doyle of Bike Helena, “we’re a prime early season riding destination.” While trails in Bozeman might stay snow covered into July, the folks in Helena usually ride dry singletrack from April to November. With Cut Bank, Montana—oftentimes one of the coldest cities in the nation—located about three hours to the north, Helena lucks out with one of the sweetest spots in the state for mild weather.

Greg Heil, *75 Miles of Singletrack, Connected to Town: Helena, Montana’s South Hills Trail System*, Singletracks (Oct. 14, 2015), available at: <http://www.singletracks.com/blog/mtb-trails/75-miles-of-singletrack-connected-to-town-helena-montanas-south-hills-trail-system/>.<sup>1</sup>

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<sup>1</sup> “The magic dirt [in the HLCNF] makes for great trails . . . for both mountain biking and hiking. When the trails are dry, they turn to hardpack, rather than getting dusty and loose. When they’re wet, they’re tacky rather than slick or gumbo-y. . . . Dirt like that is hard to find.” Erin Madison, *Helena Makes its Mark as a*

These are just some of the factors which slowly led to the HLCNF becoming such a popular area for mountain bikers, both for locals and visitors alike. See, e.g., Greg Lemon, *Helena Earns Recognition as Mountain Biking Destination*, Helena I.R. (Aug. 15, 2015), available at: [http://helenair.com/news/local/helena-earns-recognition-as-mountain-biking-destination/article\\_5652464d-5f5f-5476-97d9-b3227db8a096.html](http://helenair.com/news/local/helena-earns-recognition-as-mountain-biking-destination/article_5652464d-5f5f-5476-97d9-b3227db8a096.html).

With increased frequency, mountain bikers soon began to expand their range of use from just the South Hills of Helena, and into the surrounding geographic areas of the HLCNF. Recognizing the positive impact that mountain bikers were having on their local economies, communities within the HLCNF began taking steps to promote their trails and capitalize on the benefits obtained from that growing user group. For example:

For the last 10 years, Helena ran a program called “Trolley to Trails” that would shuttle locals to one trailhead (Mount Helena Ridge), one day per week. This was an old school trolley on wheels like you’d see in San Francisco, and it could hold about 15 bikes.

Greg Heil, *Helena, Montana Shuttles Riders to the Best Trails, 5 Days a Week, For Free*, Singletracks (Oct. 14, 2015), available at: <http://www.singletracks.com/blog/mtb-trails/helena-montana-shuttles-riders-to-the-best-trails-5-days-a-week-for-free/>.

## **B. Recent developments of mountain biking in the HLCNF.**

Working to capitalize on its surrounding trails, including those found in the HLCNF, Helena took the lead on turning the area into a destination for mountain bikers – progress which has similarly helped the surrounding smaller communities. For example, in 2013, the Helena Tourism Alliance launched Bike Helena in an effort to brand Helena as a biking destination. In just one year following the launch of Bike Helena, “[i]n 2014, hotel occupancy increased 1.5 percent.” Madison, *Helena Makes its Mark as a Mountain-Biking Destination*, footnote 1, *supra*.

These gains, however, did not materialize without innovative ideas and action.

[A]fter spending a year taking input from the local community, [Bike Helena] decided to drastically expand the [Trolley to Trails] shuttle operation. In order to get this new operation off the ground, they approached the Helena Area Transit Service. The transit service had a bus that had almost passed its usable life as a regular transit bus by federal law, but was still in great shape for shuttling rowdy mountain bikers up the mountain side. They donated it to

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*Mountain-Biking Destination*, Seattle Times (Sept. 9, 2015), available at: <http://www.seattletimes.com/life/travel/helena-makes-its-mark-as-a-mountain-biking-destination/>

the cause, Bike Helena bought a trailer, and some of the guys from the transit service fabricated a bike mounting system on the trailer. The trailer can now carry many more bikes than there are seats in the bus.

But if this thing runs five days per week, who pays for it? The short answer is that it's free for locals and out of towners to use, and it's funded by the city of Helena. The long answer is that Bike Helena is funded by a bed tax that is levied by the city. So every time you spend money on a hotel room for a night, a little bit of that goes to Bike Helena. Then, Bike Helena pays a flat fee out of their budget to the Helena Area Transit Service, and that organization hires the drivers, maintains the bus, and keeps the whole program running. Presto! You have a free mountain bike shuttle service!

Heil, *Helena, Montana Shuttles Riders to the Best Trails, 5 Days a Week, For Free, supra.*

With the success of the Trail Rider Shuttle, Bike Helena also developed a very special event: Shuttle Fest. That event involves “[t]hree days of all-you-can ride shuttles, combined with a rendezvous with 29 of the best breweries in the state of Montana, and you have the makings for a pretty epic weekend!” *Id.*

All these actions taken to develop the mountain biking culture in the area did not go without recognition:

The same year the Helena Tourism Alliance created Bike Helena, Helena was designated as a Ride Center by the International Mountain Bicycling Association (“IMBA”). . . . Getting that endorsement isn’t easy. There are currently 27 IMBA Ride Centers worldwide. Helena is the only community in Montana with the designation. Communities must be invited to apply. After getting an invitation, the application takes about 40 hours to complete, [Pat] Doyle said. Then IMBA sends a couple representatives to spend three days in the town, checking out the trails and seeing what else the community has to offer. . . . Basically, IMBA wants to see whether there’s enough riding and after-ride entertainment to fill a three-day trip. The Bicycling Association determined that Helena did in fact qualify and gave the city a bronze Ride Center designation.

Madison, *Helena Makes its Mark as a Mountain-Biking Destination*, footnote 1, *supra.*

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IMBA's bronze-level designation earned Helena and the HLCNF recognition in mountain-biking magazines, on websites and on top mountain-bike destination lists.<sup>2</sup> The growth in popularity for mountain biking in the HLCNF was the result of collaborative efforts that took many years to achieve – many individuals, organizations and businesses helped contribute to make mountain biking in the HLCNF what is today. But it has not stopped there – efforts are still taken to improve the area's unique biking culture.

For example, the Vigilante Bike Park, developed with the help of Helena Parks and Recreation, is “a community bike park built and maintained by volunteers, [and] is similar to a skate park, but made for bike riding. The bike park is a community space where people of all ages and abilities can ride their bikes on a variety of fun terrain features.” Available at: <http://www.vigilantebikepark.com/>. Further, construction has recently begun on a 25-foot-tall bicycle sculpture – called the “Helena Bike Tower” – which will be built from donated bicycles from the community and installed in front of the Cinemark movie theater in the Great Northern Town Center. Available at: <http://www.bikehelena.com/index.php/helena-bike-tower/>; see also [http://helenair.com/news/local/immortalize-your-bike-junkers-wanted-for--foot-tall-sculpture/article\\_cedbbba4-1a99-5ea4-9486-d12966718abd.html](http://helenair.com/news/local/immortalize-your-bike-junkers-wanted-for--foot-tall-sculpture/article_cedbbba4-1a99-5ea4-9486-d12966718abd.html).

All these factors contributed to Helena, Montana, achieving the designation as an IMBA silver-level Ride Center in 2015:

Helena's prestige in the world of mountain biking continues to increase. Last week the International Mountain Biking Association designated Helena as a silver level ride center, one of only 10 worldwide, and the only one in Montana. In touting Helena as a ride center, IMBA points to the central

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<sup>2</sup> There are many examples of the growing acclaim and recognition for the mountain biking in the HLCNF, these are just a few:

- “Quick, what's the first thing you think of when you hear, ‘Helena, Montana?’ Well, sure, it's the state capital. But did you also know that it's the defacto singletrack capital of Montana? We were stoked to spend a few days exploring the area.” Hurl Everstone, *Heavy Pedal Tour – the trails, free shuttles and beer of Helena, Montana*, Bike Magazine, available at: <http://www.bikemag.com/news/heavy-pedal-tour-2014-helena-montana/#qDixQLdeOMF56PZE.97>
- “One-hundred fifty years ago, get-rich-quick schemers struck gold in what is now Helena in southwest Montana. More recently, the dry, fir-adorned foothills flanking Montana's capital have produced riches for mountain bikers. . . . Helena [has turned] into a destination mountain bike town: the International Mountain Biking Association [formerly] recognized Helena as one of 16 bronze-level Ride Centers in the world, among the likes of Steamboat Springs and Aspen Snowmass. [Helena is now a silver level ride center.]” Aaron Theisen, *Bike Helena: Montana's Mountain Biking Capital*, Out There Magazine, available at: <http://www.outtheremonthly.com/bike-helena-montanas-mountain-biking-capital/>.
- “Helena is not the West's most impressive spot to ride when it comes to pure diversity or bucket list vertical drops, but the town and its riding community's efforts to tie it all together . . . is something that will make any rider jealous when they head back home.” Ryan Dunfee, *The Local's Guide to Mountain Biking Helena, MT*, Teton Gravity Research (Jun. 16, 2015), available at: <http://www.tetongravity.com/story/bike/the-locals-guide-to-mountain-biking-helena-mt>.

location of its trail system, the amenities the town has to offer and the variety of skill levels the trail system serves. “To top that, Helena offers free shuttles that run five days a week, taking you to the best trailheads in the South Hills Trail System, as well as to the top of the Continental Divide to access the iconic Continental Divide Trail,” reads IMBA’s release. “Plus, Helena offers a vibrant, in-town cycling scene.”

Lemon, *Helena Earns Recognition as Mountain Biking Destination*, *supra*; see also: <https://www.imba.com/model-trails/ride-centers>. Mountain biking’s distinctive roles and contributions in the HLCNF are now widely recognized not only by its local residents, but also on a national and international level.

### **C. Economic and social impact of mountain biking in the HLCNF.**

To pose a rhetorical question: How do the various actions taken by the city of Helena, including the implementation of a free shuttle service, make fiscal sense for the community? The answer, of course, is the economic impact that mountain biking has had and continues to have on the area:

[A]s of 2014, mountain biking’s economic impact in Helena was conservatively calculated at \$3 million per year—and that number is only going up, as more and more riders flock to Helena to ride.

Nowadays, the shuttle service runs regularly through the spring, summer, and fall, with Shuttle Fest happening once per year. Last year, in 2014, Shuttle Fest attracted 350 people, and the brewfest garnered 1,700 attendees. Based on my experience on the packed-out busses this year, Bike Helena is going to have to figure out a way to get more than one shuttle running for the 2016 event, because the word is out! Even the non-Shuttle Fest crowd continues to grow. This year, the Trail Rider shuttle transported 1,700 people (excluding the Shuttle Fest attendees), June-September, with August being the busiest month with 759 riders.

Heil, *Helena, Montana Shuttles Riders to the Best Trails, 5 Days a Week, For Free*, *supra*.

The rise in popularity of mountain biking around the West has also been a boon to Helena businesses and driven interest in the local trail system. [There] has certainly been an increase in traffic from people who come to town because Helena is a mountain biking destination. [There is] also an increased number of people who have moved to Helena because of the trail system and mountain biking opportunities. . . . Additionally, many local

businesses take advantage of having more tourists and visitor coming to town, from local breweries and restaurant to local shops.

Lemon, *Helena Earns Recognition as Mountain Biking Destination*, *supra*.

It was the discovery of gold that spurred the settlement of Helena 150 years ago, but it is the access to such great recreational assets that will spur on its rediscovery by a new generation that chooses where to live and work based as much on community amenities as on salaries.

Helena's economy has long been buoyed by government jobs, and we're the better for it. We've largely avoided the large economic swings that other communities have had to ride through. However, diversification in our local economy is an important aspiration. That diversification is currently underway, as evident by the growth in manufacturing businesses like Boeing and Pioneer Aviation.

Also, as [the Independent Record] reported recently in the annual Montana Economic Outlook, Helena is seeing a growth in high-tech jobs with companies who come here because technology allows them to operate anywhere and Helena's amenities, including the close proximity to wild open space, makes attracting the best and brightest much easier.

A glance through the real estate listings demonstrates the asset these public lands are. Realtors promote access to Helena's trail system and public lands as amenities and selling points for many homes across the South Side of town.

*An IR View: Helena's open space treasure of community*, Helena IR (Jan. 10, 2016), available at: [http://helenair.com/news/opinion/an-ir-view-helena-s-open-space-treasure-of-community/article\\_5fd1be60-c78b-5889-bab2-d6794b330ee7.html](http://helenair.com/news/opinion/an-ir-view-helena-s-open-space-treasure-of-community/article_5fd1be60-c78b-5889-bab2-d6794b330ee7.html) (emphasis added).

The economic impact of mountain biking in Montana is not isolated to Helena and the Divide geographic area; instead, it similarly has an impact on many of the communities within and around the HLCNF:

Montana, rich in great trails, beautiful scenery and down-home hospitality, is ripe to profit from mountain bike tourism. Two recent studies reveal information that mountain bike recreation provides a green and sustainable economy for rural communities surrounded by public lands. The findings document the economic power of mountain biking and verify the potential



benefits for towns like Butte, Dillon, Philipsburg, Hamilton, West Yellowstone and scores of others across the State.

A study just released by Shimano and IMBA ranks Montana among the top three states in the nation with over 30% of the population riding mountain bikes. 50 million mountain bikers pump \$26 Billion into the American economy in direct expenditures benefiting retail sales, services and tourism-related industries locally, regionally and nationally. Nationally, there are 1.5 times more mountain bikers than golfers.

Available at: <http://www.montanamountainbikealliance.com/mtb-economics>.

In addition, the I-90 and I-15 “interstate corridors” that bisect the state allow visitors to easily access the HLCNF’s various geographic areas. As such, the economic and social benefits of mountain biking is similarly playing a big role in the communities surrounded by HLCNF lands. Through regional marketing of this semi-primitive nonmotorized asset, those social and economic benefits continue to increase. See: <http://www.visitmt.com/things-to-do/outdoor-and-adventure/mountain-biking.html> (the State of Montana Office of Tourism even acknowledges on its website that “Montana is a destination for its single track mountain bike trails. . . . Trails are community supported, built and maintained by passionate residents.”).

The Montana Institute for Tourism and Recreation Research (“ITRR”) conducted a study which found that cyclists spend \$75 - \$103 per day while in Montana, and stay an average of eight or more nights. Researchers queried cyclists who had visited Adventure Cycling headquarters in 2013, or who had purchased Montana section maps between 2010-2013. Those cyclists hailed from 48 states and 18 countries. See Norma P. Nickerson, *Analysis of Touring Cyclists: Impacts, Needs and Opportunities for Montana*, ITRR (Jan. 1, 2014).

In a follow-up study due to the “added interest in bicycling, ITRR asked Montana residents their views of and participation in bicycling,” and summarized:

According to various research entities and articles around the world, bicycling is on the rise as a form of commuting, recreation, and tourism. In a recent study by ITRR about bicycle tourism in Montana, the economic impact throughout the state included small towns and rural areas. Recently more and more headlines are claiming that “Cycling is the new golf”.

Megan Schultz, *The Montana Expression 2015: Bicycling*, ITRR, at 3 (June 3, 2015) (citations omitted).

So what does this all mean? Since the desired conditions for the HLCNF must “set forth the desired landscape of the future,” the growing impact of mountain biking should be a central focus and concern for the HLCNF. Since the last Forest Plan was developed in 1986, mountain biking has grown exponentially both nationally and locally. The importance of the aforementioned developments and impacts of mountain biking on the desired conditions in the HLCNF cannot be overstated. Accordingly, the MBG respectfully requests that the HLCNF expressly incorporate, and in doing so, consider these impacts in the Final Desired Conditions document.

## **II. CHAPTER 1: SOCIAL AND ECONOMIC CHARACTERISTICS (page 3).<sup>3</sup>**

Under the section entitled “Social and Economic Characteristics,” the Draft Desired Conditions states that “[t]he HLCNFs serve as a backdrop, workplace, and playground for not only the small rural communities of central Montana, but also for visitors from around the world.” This statement ignores the fact that Helena – the capital city of Montana – and its surrounding population not only borders the Divide geographic area, but is also surrounded by the Elkhorn and Big Belt geographic areas. This distinction, which recognizes Helena’s close proximity to these geographic areas and the urban forest backdrop for the Helena area, is important for several reasons, including, but not limited to: (1) how that plays into the recreation opportunity spectrum in Chapter 2, Item 5; and (2) so that the desired conditions for the Divide, Elkhorn, and Big Belt geographic areas reflect our community values and are managed according to these local conditions.

## **III. CHAPTER 2: ITEM 4. BENEFITS TO PEOPLE: MULTIPLE USES AND ECOSYSTEM SERVICES.**

### **A. Item 4 (page 32) – Introduction.**

Pursuant to the Multiple-Use Sustained-Yield Act of 1960, “multiple use” is defined to include:

[t]he management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions . . . .

16 U.S.C. § 531(a) (2015) (emphasis added).

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<sup>3</sup> Unless otherwise indicated, all item and page number references are made with regards to the November 2015 “DRAFT Desired Conditions – Helena and Lewis & Clark National Forests” document, which is the subject of these requested comments.

Accordingly, the desired conditions for the HLCNF must reflect the needs of the American people and should correspondingly be adjusted in conformity with the changing needs and conditions that are present in our local forests. See *id.* The ever-growing popularity of mountain biking and its economic impact on Montana communities reflect the changing needs and conditions in the HLCNF. In turn, this highlights the distinctive roles and contributions which should serve as the basis and motivation for promoting the expansion of HLCNF's trail systems and should be specifically incorporated into the final desired conditions document. See 36 C.F.R. § 219.2(b) (2015).

**B. Item 4.1 (page 33) – General contributions to Social and Economic Sustainability.**

The Final Desired Conditions document should reflect the growing economic impact of mountain biking in Montana; both expressly and with the frequency of specifically including mountain biking in relevant desired conditions. The increasing positive economic impact that mountain biking is having is evident due to the actions taken by the communities and local residents of the HLCNF.

Montana is now a destination for mountain biking. As a result, both the numbers of mountain bikers and their frequency of use are increasing on HLCNF lands. While this impacts the density of traffic in certain geographic areas, this plays a role on the benefit to local economies, public health and community building within the local communities. Responsible growth of our present trail systems will improve the quality of life in nearby communities and positively impact the larger population as a whole.

Since the Final Desired Conditions document should be drafted to “conform to [these] changing needs and conditions,” 16 U.S.C. § 531(a), it is respectfully requested that a third desired condition is included among those identified in Item 4.1, to specifically include “mountain biking” as a desired condition contributing towards the social and economic impact for the HLCNF.

**C. Item 4.2 (page 33) – Outdoor Recreation.**

The desired conditions in Item 4.2 should not only state that “outdoor recreation is an important use throughout the HLCNF,” but also expressly provide for protection of existing recreation opportunities as well as promoting and expanding those outdoor recreation opportunities when considering the benefits to the public. In essence, emphasis of the protection, promotion, and expansion of outdoor recreational opportunities within the HLCNF should occur throughout the Final Desired Conditions document.

The Final Desired Conditions document should also provide latitude to accommodate emerging recreational uses – not only with regards to the HLCNF as a whole, but also for

each specific geographic area. For example, “fat bikes” are a new type of cycling which make riding over the snow possible. As these and other yet-to-be-developed recreational activities emerge, the HLCNF and its specific geographic areas need to be flexible in accommodating these emerging recreational uses. Accordingly, a desired condition which anticipates new uses of our public lands should be included.

#### **D. Item 4.16 (page 36) – Partnerships and Coordination.**

The partnerships and coordination section of the desired conditions is a crucial section of the document. Advocacy user groups for mountain bikers, such as the Montana Bicycle Guild, Inc. (“MBG”), should be a focal point for input and ideas for management of the HLCNF in the future. Additionally, the HLCNF should establish and maintain strong partnerships with all user groups in an effort to effectively manage and use our national forests. Such partnerships would be mutually beneficial, since the MBG and other user groups help to bridge the gap between their respective participants and the HLCNF.

Ultimately, when an organization and/or people affiliated with that organization advocate on behalf of a user group, it heightens public awareness. In turn, the HLCNF benefits because an organization can represent the collective interests of a particular user group while simultaneously keeping those individuals within the user group informed and involved. Further, individuals affiliated with a user group, such as the MBG, can act as stewards of the land and help to maintain the resources we work so hard to protect and achieve within the HLCNF.

Item 4.16 should include an additional desired condition which expressly encourages the HLCNF to have at least bi-annual meetings with different user groups or a mechanism for user groups to submit reports and/or comments for the HLCNF’s review. In this way, the HLCNF would be actively involved with the goals and positions of each respective user group and would similarly allow the different user groups to have a sense of participation and ownership of decisions.

Further, Item 5.4 provides that “dispersed recreation [is] managed according to fiscal capability.” A provision should be included whereby partners and user groups *actively assisting and involved with the HLCNF* in developing and maintaining dispersed recreation receive priority for grant opportunities. Moreover, those grant opportunities should be coordinated with partners so that dispersed recreation is managed effectively and according to fiscal capability.

Through coordinated partnerships, the HLCNF should allow mountain bike user groups, such as the MBG, to continue advocating and pushing for more access to the HLCNF, increasing the number and quality of mountain bike trails, and allowing bikers to be an integral part of that implementation process.

#### **IV. CHAPTER 2: ITEM 5. RECREATION SETTINGS, OPPORTUNITIES, ACCESS, AND SCENERY**

##### **A. Item 5.1 (page 37) – Sustainable Recreation.**

Mountain biking is, by definition, sustainable recreation since it takes the form of recreation “that is ecologically, economically, and socially sustainable for present and future generations.” 36 C.F.R. § 219.19 (2015). Due to the increased traffic brought by mountain biking’s popularity in the HLCNF, there should be an express provision which provides for the expansion of trails and trail systems in the Final Desired Conditions document. This is in alignment with the purpose of the desired conditions and how the communities within the HLCNF have embraced mountain biking. In essence, mountain biking should be a primary consideration for how the HLCNF manages its recreational opportunities in the future.

##### **B. Item 5.2 (pages 37-38) – Recreation Settings.**

The MBG disagrees with desired condition number 2 in Item 5.2, which provides that “[recreation opportunity spectrum] settings are in alignment with current travel plan decisions.” Such a provision leaves travel plans rigid without room for expansion; instead, the ROS system should be flexible, thus allowing for the expansion of additional opportunities for mountain biking in areas that were previously off limits. Similarly, there should be no further restrictions on access and use for the semi-primitive nonmotorized class of ROS. Again, these opportunities should be expanded, not limited.

In addition, flexibility with trail management will increase enjoyment of the trails and will diminish user conflicts. For example, permitting certain trails as “recommended downhill mountain bike trails” would work to lessen user conflicts and discontent by alleviating the risk of user conflicts. These designations must not restrict a trail to one particular user group, but rather serve to provide all trail users with the knowledge of the predominant use of the various trails in the HLCNF. These simple actions would also increase the popularity of mountain biking and all other trail users in the HLCNF, and with it, reap the associated economic and social benefits. By expressly providing that the HLCNF is open to these possibilities as a desired condition, it leaves room for this to happen in the future.

In addition, Section 5.2 (and other relevant sections) should include a desired condition which works to establish and develop semi-primitive nonmotorized connecting routes between various recreational opportunity areas. For example, the creation of a MacDonald Pass-to-Helena route through the public lands would greatly benefit the public and the users of the HLCNF. While specific travel plans can sort out the details of this trail system, expressly stating this in the Desired Conditions document would allow this to happen in the future.

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**C. Item 5.4 (pages 38-39) – Recreational Opportunities – Dispersed Recreation.**

The MBG disagrees that “[d]ispersed recreation activities [should be] managed according to fiscal capability.” Instead, this should be tied in with Item 4.16 on page 36 – “Partnerships and Coordination.” The two Items are not mutually exclusive. The Final Desired Conditions document cannot on the one hand claim that a desired condition is to achieve partnerships with local interest groups, while on the other hand state that management of dispersed recreation is pursuant to its fiscal capability. Please use these partnerships and coordination with mountain bike user groups to help manage dispersed recreation areas.

Further, desired condition number 4 states that “[n]ew or emerging recreation opportunities or uses occur in the appropriate [recreation opportunity spectrum] settings and do not conflict with the current travel management plans and existing recreation uses.” The desired conditions for Item 5.4 should encourage the expansion of dispersed recreation. Instead of having “new or emerging recreation opportunities” fit into a pre-planned box, future travel management plans should actively look to ways in which recreation opportunities may be expanded – in particular, with regards to mountain biking.

**D. Item 5.5 (page 39) – Recreation Access**

The above comments are similarly relevant to desired condition number 2 in Item 5.5, which provides: “Travel management plans align with desired ROS settings.” The desired conditions must expressly encourage these expanded opportunities.

**E. Item 5.6 (pages 39-40) – Recreational Special Uses.**

Since the MBG is the entity that runs the Montana Enduro Series, we have a particular interest in the use of special recreation permits. These are necessary for what we do and they have a positive impact on Montanans and visitors, alike. It is through these special recreation permits that we are able to coordinate and run the Montana Enduro Series on HLCNF lands. So thank you!

**V. CHAPTER 2: ITEM 6 – DESIGNATED AREAS**

**A. Item 6.1 (page 41) – Designated Wilderness Areas**

Wilderness areas are one of the cornerstones of our national forests. They are, without question, one of the best preservation tools to protect nature for future generations.

The prohibition of mechanized vehicles within the wilderness areas causes much concern when reviewing Section 6 of the desired conditions. Namely, there is no specific desired condition which specifically addresses maintaining access to a particular trail or network of

trails for semi-primitive nonmotorized user groups. Understanding that this prohibition is the result of federal law and that it cannot change absent Congressional action, alternatives to prohibiting semi-primitive nonmotorized, mechanized travel on existing trails should be a desired condition particularly where established semi-primitive nonmotorized access and trails currently exist or may exist when those wilderness areas are designated.

### **B. Item 6.2 (page 42) – Recommended Wilderness Areas**

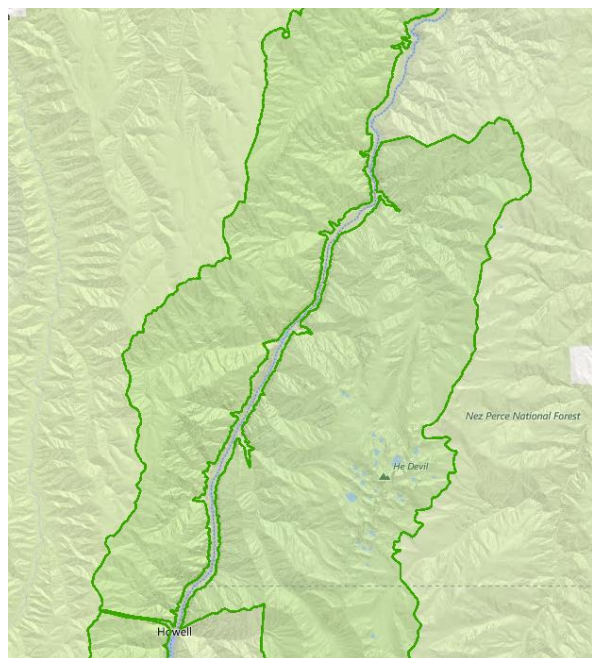
Recommended wilderness areas have the potential to shut off access for many user groups to an area. Without losing sight of the purpose of a wilderness area, semi-primitive nonmotorized user groups – as opposed to mechanized – do not impact the forests in the same manner as motorized user groups. Nonmotorized user groups are unique in that they maintain and protect the ecological and social characteristics of the forest. Additionally, semi-primitive nonmotorized use of national forests does not detract from the national forest's natural setting.

A desired condition under Section 6.2 should be the consideration of an area's current uses and access for the various semi-primitive nonmotorized user groups. Additionally, the recommended wilderness areas should account for those semi-primitive nonmotorized uses during the creation of boundary lines for recommended wilderness areas.

One solution that has been implemented successfully in other national forests and wilderness areas is the creation of corridors into and through wilderness areas when establishing the boundaries. Establishing corridors by way of deliberate boundary lines through wilderness areas is vital to maintain access for semi-primitive nonmotorized users.

It is important to note that it is the existing trail systems that mountain bikers wish to preserve. We are not advocating for the creation of new trail systems in wilderness areas; rather, it is the preservation of access to established areas for all semi-primitive nonmotorized user groups to areas when establishing wilderness areas or making recommended wilderness areas.

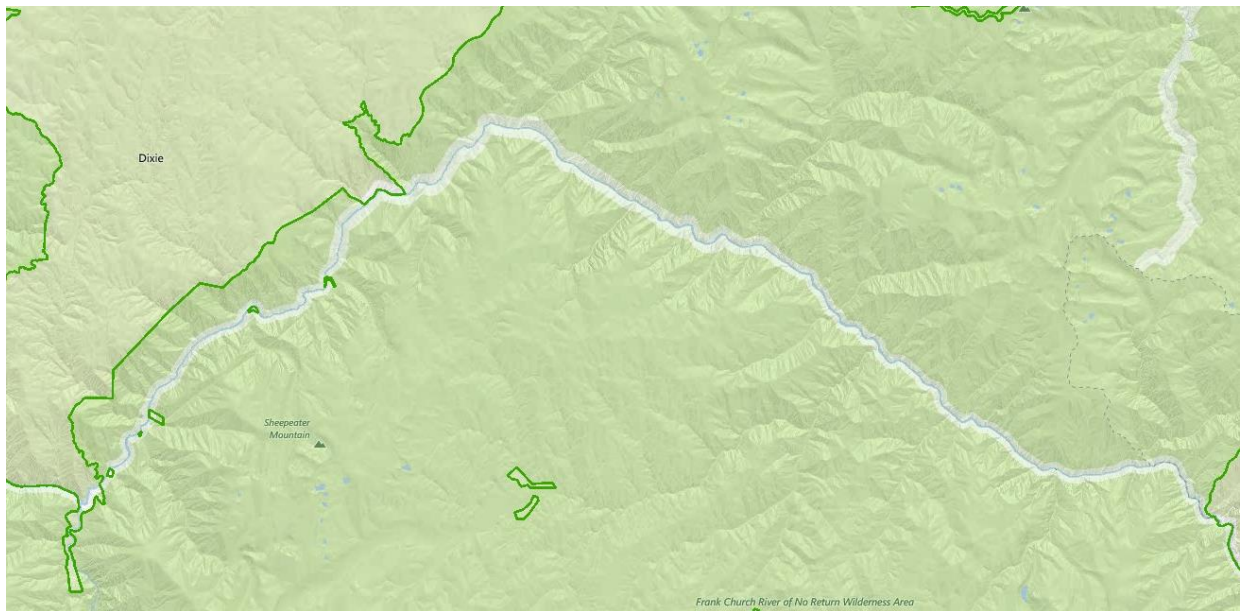
Precedent exists for this type of desired condition to be included. For example, Congress included specific language in the Hells Canyon National Recreation Area Act (pictured to the right) which allows for power boats to be used on the wild and scenic Snake River. This river flows directly through the Hells Canyon Wilderness Area. According to recreation.gov, this corridor was created because of the Congressional recognition of established powerboat use on the Snake River



in Hells Canyon National Recreation Area. Available at: [http://recreation.gov/permits/Main\\_Salmon\\_River\\_Powerboat/r/wildernessAreaDetails.do?page=details&contractCode=NRSO&parkId=74985](http://recreation.gov/permits/Main_Salmon_River_Powerboat/r/wildernessAreaDetails.do?page=details&contractCode=NRSO&parkId=74985).

A similar logic and approach should be applied to the creation of new wilderness areas being considered in the HLCNF for semi-primitive nonmotorized user groups. Where established use of a trail or trail system by multiple, semi-primitive nonmotorized user groups exists, preservation of that use should be paramount when determining the boundaries of the Wilderness Area.

It is possible to create these corridors without affecting the quality of the wilderness area. This can be demonstrated by numerous corridors which exist in wilderness areas to permit a specific type of use. For example, the Main Salmon River bisecting both the Frank Church River of No Return and Selway Bitterroot Wilderness areas (pictured below) is accessible by power boats with a permit:



This is not the only corridor in the Frank Church River of No Return Wilderness Area. Of particular note is the Magruder Corridor Road (pictured below) which completely bisects the Frank Church Wilderness Area:

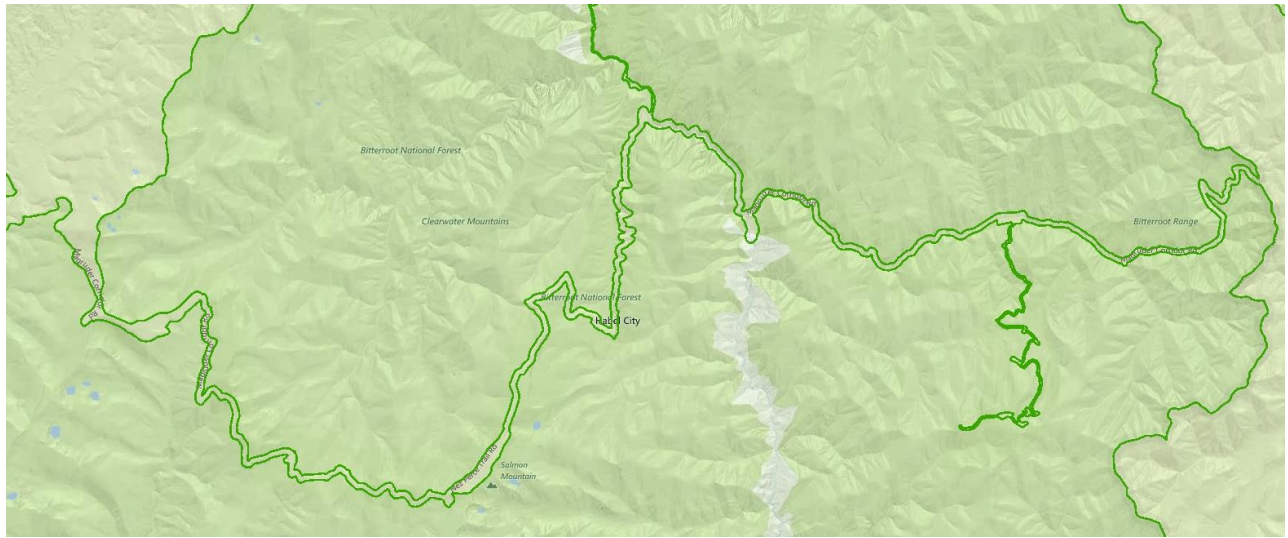
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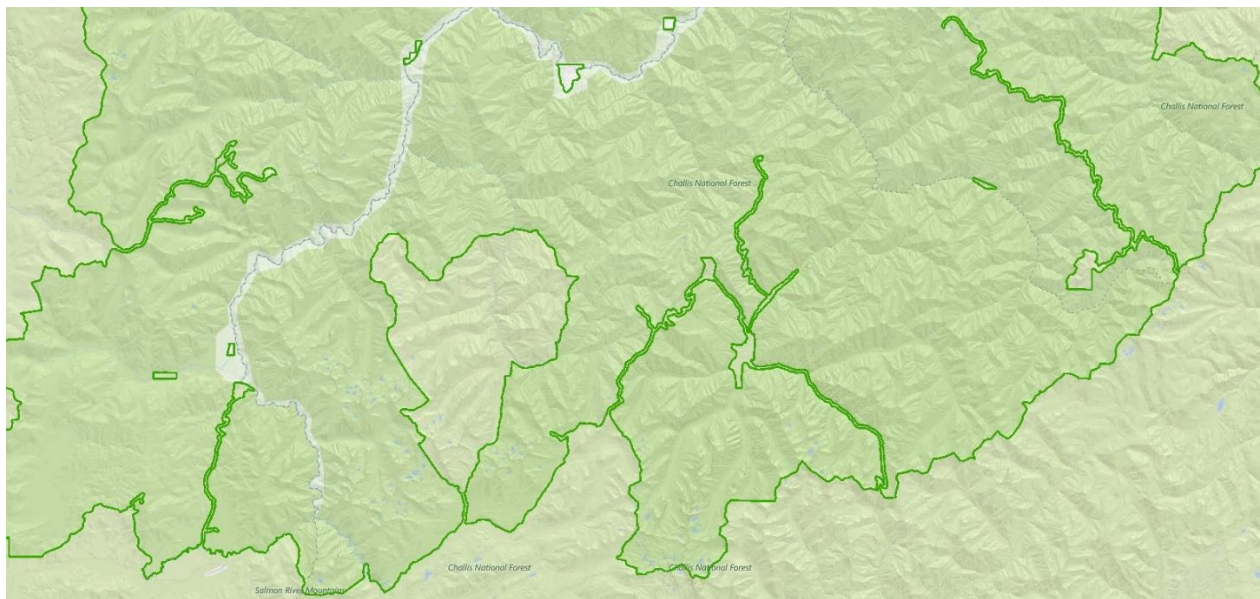
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Numerous other corridors in the Frank Church Wilderness Area (denoted by the dark green lines in the image below) exist to accommodate roads and access to areas:



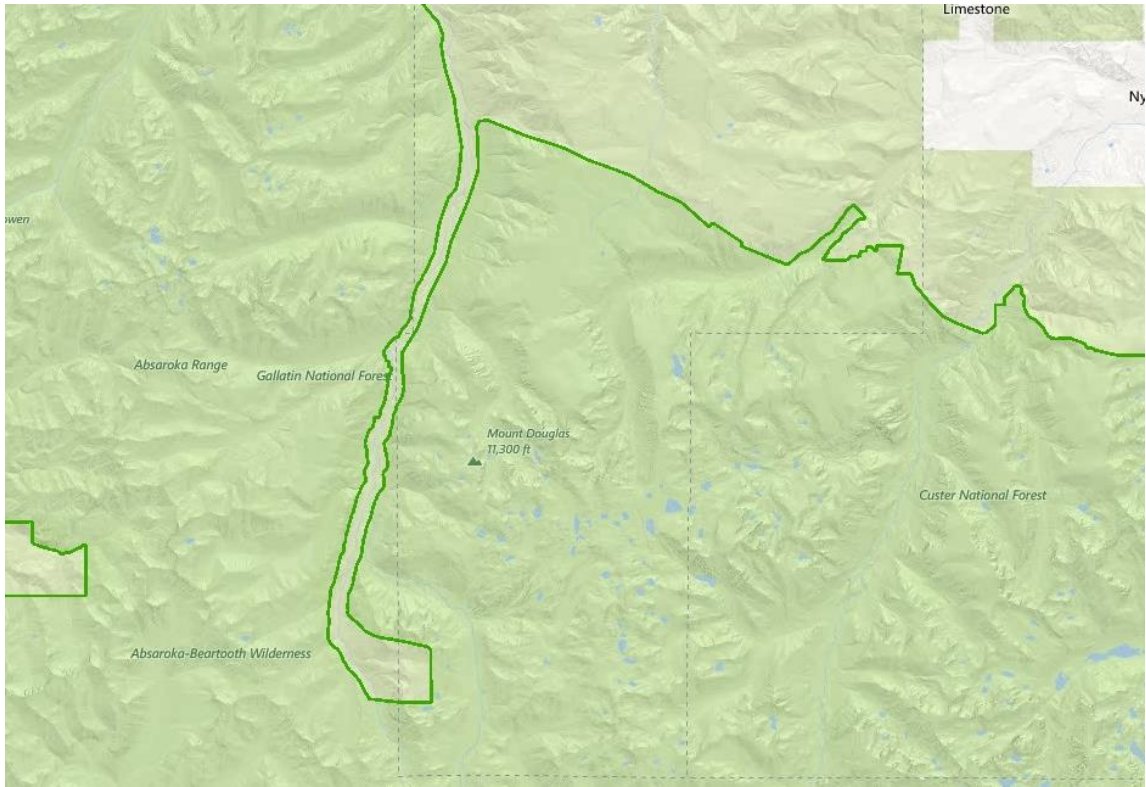
The Absaroka-Beartooth Wilderness area similarly has numerous corridors. Of particular note is the corridor around NF-6639 Road (pictured below) which ends nearly 20 miles into the wilderness area:

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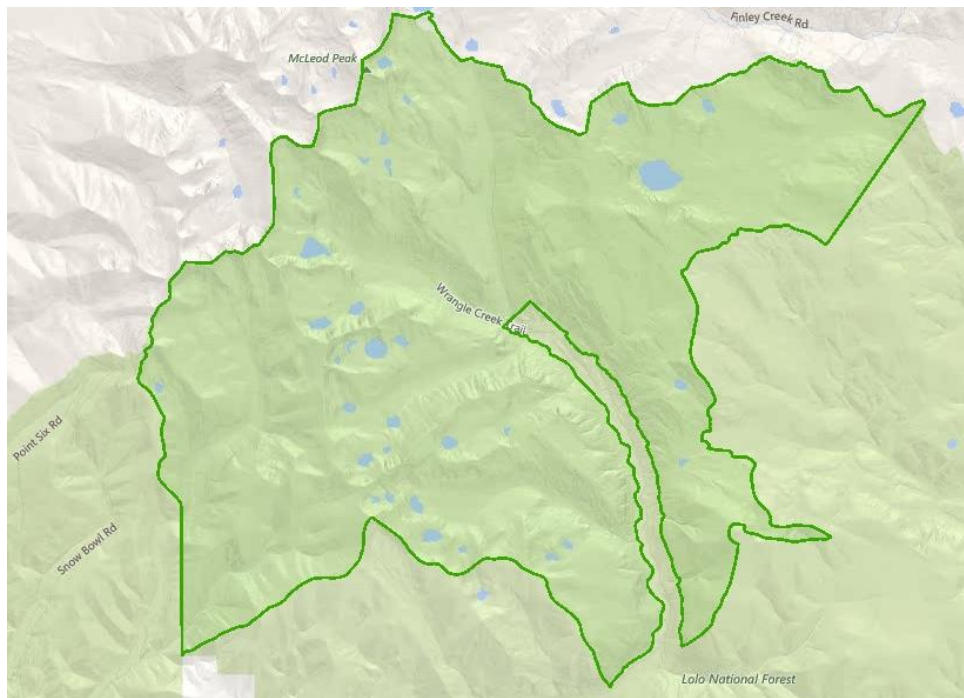
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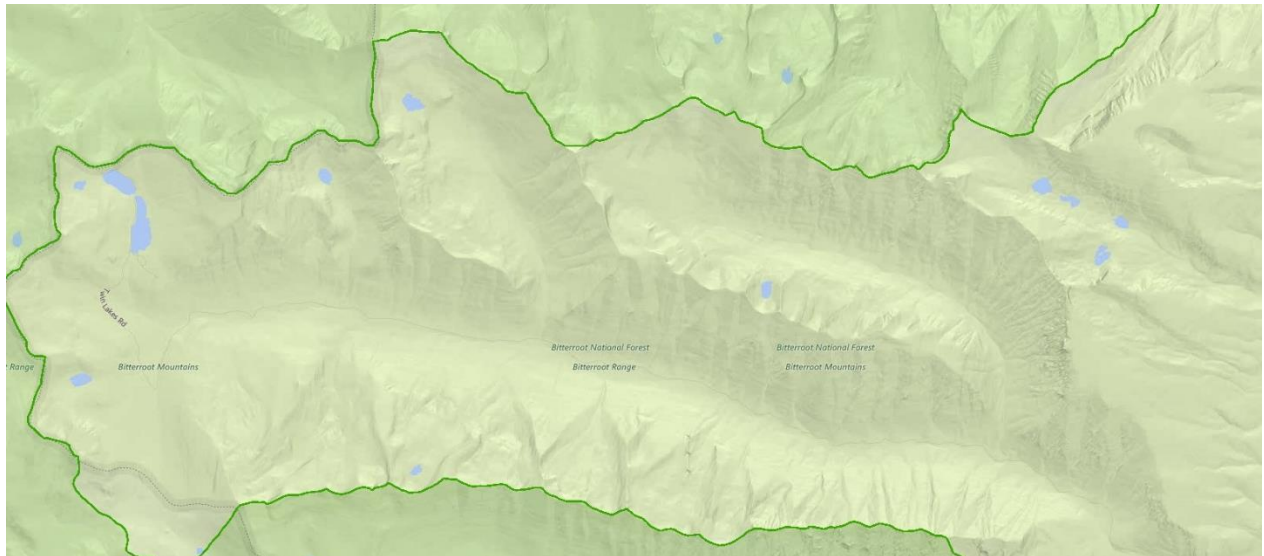


The Rattlesnake Wilderness also has a long corridor (pictured below) that permits semi-primitive nonmotorized travel on the Rattlesnake's trail system:



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Another corridor exists in the Lost Horse Canyon and Twin Lakes Road (pictured below) in the Selway-Bitterroot Wilderness area:



The above examples are meant to highlight the possible alternative means that the HLCNF can employ to preserve mountain biking access to any future wilderness areas. In essence, the HLCNF should expressly state as a desired condition that every effort should be taken, within the scope of HLCNF's lawful authority, to retain all currently available semi-primitive nonmotorized access in both recommended and future wilderness areas. While the HLCNF does not designate wilderness areas, it certainly plays a role and makes recommendations on the decision made by Congress relative to those areas. Any possible means to accomplishing that objective should be employed by HLCNF, including, but not limited to, recommending and advocating for no further restrictions when it coordinates and makes recommendations to Congress.

### **C. Item 6.3 (page 42) – Wilderness Study Act Areas**

Without repeating the comments provided for Item 6.2, *supra*, the creation of corridors for existing semi-primitive nonmotorized uses in and through the Wilderness Study Act areas in the HLCNF should be a desired condition. In particular, “administ[ration] by the Secretary of Agriculture so as to maintain [the area’s] presently-existing wilderness character” necessitates the consideration of existing trails and uses of those trails. Pub. L. No. 95-150, § 3(a), 91 Stat. 1243 (1977) (emphasis added). Creation of semi-primitive nonmotorized corridors through these areas would effectively partition off – albeit a narrow corridor – the areas which are already used by mountain bikers. This has the effect of meeting the requirements for the wilderness area as well as meeting the previously-identified desired conditions discussed throughout these comments.

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## **VI. CHAPTER 2: ITEM 8 (pages 47-48) – INFRASTRUCTURE**

The MBG hereby incorporates by reference, as though fully restated herein, its comments to Item 4.16 and the subsections of Item 5, *supra*. Mountain bike user groups, such as the MBG, should be an integral part of the trail evaluation, planning, implementation, and maintenance process.

Desired condition number 1 provides, in relevant part, that “[c]ommunity involvement is promoted and user awareness programs (educational and informational) enhance the recreational experience.” This desired condition directly relates to the comments provided in Item 5.2, *supra*. To reiterate, mountain bikers are concerned that the HLCNF does not have “recommended downhill mountain bike trails.” This is not a request to close trails to any other user group. Rather, by having such trails, it would effectively mitigate the risk of user conflict and similarly allow for the creation of specific “downhill mountain biking recommended” trails. In other words, hikers would still be permitted to hike up those trails, but would be made patently aware of the high likelihood of encountering downhill mountain bike traffic. Additionally, a break from the status quo should occur: on these specific trails, downhill mountain bike traffic should have the right-of-way. Incorporating these into the Final Desired Conditions document would similarly allow for downhill-specific trails to be planned and built in future travel plans. By “educating and informing” all user groups of the intended right-of-way, it would necessarily “enhance the recreational experience.”

The Final Desired Conditions document should support and encourage the expansion of trails and the trail infrastructure within the HLCNF. As desired condition number 9 provides, “[t]rails [should be] in the appropriate trail class for existing use levels and use type. The management of trails is responsive to changes in demand, while protecting natural and cultural resources.” Existing use levels for mountain biking has dramatically increased and there is correspondingly a big shift in demand for trails specifically designed for downhill mountain bike traffic. Due to the underlying economic and social impact of mountain biking, this should be a primary focus in the desired conditions and for the Forest Plan as a whole.

## **VII. CHAPTER 3: PROPOSED GEOGRAPHIC AREA DESIRED CONDITIONS.**

### **A. Big Belts Geographic Area – (pages 53-55).**

As the General Overview for the Big Belts geographic area plainly recognizes, “[t]he nearest population center is Helena.” The overview for the Big Belts should expressly provide that mountain biking is one of the recognized recreational uses that are utilized in the area. The HLCNF should be aware that there are multiple different existing trails within the area, including one such trail that is increasing in popularity: Beartrap Gulch. For example, in 2014, the Montana Enduro Series hosted a mountain bike race on that trail, and since that time, it continues to receive more and more traffic. Mountain biking opportunities – both

existing and non-existing – should be expressly provided for in the area’s unique characteristics (*i.e.*, similar to what is provided as a unique characteristic for the Divide geographic area).

Furthermore, the Big Belts geographic area neither provides for nor states the existence of “multiple uses” or “recreational opportunities” as part of its desired conditions. These errors, whether intentional or otherwise, should not be repeated in the Final Desired Conditions document. Accordingly, the Big Belts geographic area should include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Big Belts geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities on the Beartrap Gulch trail, and that further opportunities are allowed for mountain bike access and recreation.

### **B. Castles Geographic Area – (pages 55-56).**

The Castles geographic area’s unique geology is a draw for cyclists to explore; however, to date, the trail system does not match the quality of the area’s landforms. Unfortunately, trails that were previously shown on maps have disappeared over time – this fact is also implied in the geographic area’s overview: “[n]onmotorized access to the Castles is [now] limited.” As a result, cyclists visiting the area often return home with stories of frustration. As a public resource, the Castles’ desired conditions should identify a plan to invest in a sustainable and well-signed trail system.

Further, the Castles geographic area fails to provide for or states the existence of “recreational opportunities” as part of its desired conditions. Further, the “multiple use” desired condition only states that “Willow Creek provides a reliable and clean water supply for the city of White Sulphur Springs,” without any mention of its recreational “multiple use.” These errors, whether intentional or otherwise, should not be repeated in the Final Desired Conditions document. Accordingly, the Castles geographic area should include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Castles geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities and that further opportunities are allowed for mountain bike access and recreation.

### **C. Crazies Geographic Area – (pages 57-58).**

The Crazies geographic area is not often visited, in part, since “[p]rivate land inholdings and checkerboard ownership patterns in this GA make access to other NFS lands within the area more difficult.” Another reason, however, is because some of the trails in this geographic area are off limits to bicycles despite the lack of conflict with other user groups. As a semi-primitive nonmotorized class of ROS, mountain bikes are a quiet and muscle-

powered form of transportation that does not disturb the recreational opportunities of other user groups. Mountain bikers that visit the Crazies geographic area, by nature, have a strong will and drive to explore. These riders typically embody the primitive nature and self-sufficiency that should be encouraged in the HLCNF. A desired condition should therefore be included that steps should be taken to lift any and all bicycle restrictions on public trails in the Crazies geographic area.

Furthermore, the Crazies geographic area neither provides for nor states the existence of “multiple uses” or “recreational opportunities” as part of its desired conditions. These errors, whether intentional or otherwise, should not be repeated in the Final Desired Conditions document. Accordingly, the Crazies geographic area should include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Crazies geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities and that further opportunities are allowed for mountain bike access and recreation.

#### **D. Divide Geographic Area – (pages 58-60).**



(Photo credit: Montana Mountain Bike Alliance)

The General Overview for the Divide geographic area makes no mention of some of the spectacular and well-recognized mountain biking recreational opportunities that currently exist, and for which we hope to expand in the future. For example, this section merely provides that “MacDonald pass also offer a network of cross country skiing trails that are easily accessed by the community of Helena.” The HLCNF should note that MacDonald pass is perhaps currently more well-known for (and receives more traffic from) its mountain biking opportunities than for its cross country skiing.

For example, the Continental Divide Trail from MacDonald Pass was recently ranked one of the “20 Best Trails” in an online publication:

**#14. CDT: MacDonald Pass, Helena, Montana.**

While not a long ride mileage-wise, and despite getting a shuttle to the top, MacDonald Pass packs a punch! Rock gardens filled with big boulders both up and down dominate the traverse along the CDT, and then the descent continues to keep you on your toes with sudden, flat switchbacks. This ride is so worth the challenge, though!

*Available at:* <http://www.singletracks.com/blog/mtb-trails/the-20-best-trails-greg-explored-in-2015/>. This same section of trail coming off MacDonald Pass is also used on a weekly basis by the Trail Rider Shuttle, including during the annual “Shuttlefest” event. Since the inception of this free shuttle on the Continental Divide Trail, it was similarly recognized as one of the “10 Best Mountain Bike Shuttle Routes in the Western United States”:

**#8. Helena, Montana.**

Ok, I may be cheating here, as I’m listing an entire region as a shuttle. That isn’t technically true, but what is true is that all summer long Helena, Montana offers free shuttles to many of their most popular trails, including the Continental Divide Trail at MacDonald Pass, Helena Ridge Trail, and more. Yes, I said free vertical, as in no pedaling and no paying.

*Available at:* <http://www.singletracks.com/blog/mtb-trails/the-10-best-mtb-shuttle-routes-in-the-western-us/> (emphasis in original).



(Photo credit: Montana Mountain Bike Alliance)

Accordingly, while mountain biking is accurately recognized as a unique characteristic in the Divide geographic area, the “multiple uses” and “recreational opportunities” desired conditions should be expanded due to the impact and importance of this unique characteristic. As explained in the Introduction to these comments, *supra*, this is due in large part to the economic and social impact that mountain biking has on this special geographic area.

#### **E. Elkhorns Geographic Area – (pages 60-62).**

As the General Overview for the Elkhorns geographic area plainly recognizes, “[t]he nearest population center is Helena.” The overview for the Elkhorns should expressly provide that mountain biking is one of the recognized “recreational uses” that are utilized in the area. The HLCNF should be aware that there are multiple different existing trails within the area, including one such trail that is increasing in popularity: Muskrat Creek. Importantly, that trail continues to receive more and more traffic, and there are multiple other trails in this geographic area which are coveted by many local and non-local mountain bikers. Accordingly, mountain biking opportunities – both existing and non-existing – should be expressly provided for in the area’s unique characteristics (*i.e.*, similar to what is provided as a unique characteristic for the Divide geographic area).

Furthermore, the Elkhorns geographic area neither provides for nor states the existence of “multiple uses” or “recreational opportunities” as part of its desired conditions. These errors, whether intentional or otherwise, should not be repeated in the Final Desired Conditions document. Accordingly, the Elkhorns geographic area should include a “multiple uses”



desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Elkhorns geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities on the Muskrat Creek trail, and that further opportunities are allowed for mountain bike access and recreation.

#### **F. Highwoods Geographic Area – (pages 62-63).**

The Highwoods geographic area is important for bicyclists from both Lewistown to Great Falls. This island range has a prominent loop trail, but could use one or more loop trails, thus allowing this user group of non-motorized recreationalists to experience a different trail and allow for expanded economic and social impacts that have been experienced in other geographic areas.

Just as has been found in the other geographic areas, the Highwoods geographic area neither provides for nor states the existence of “multiple uses” or “recreational opportunities” as part of its desired conditions. These errors, whether intentional or otherwise, should not be repeated in the Final Desired Conditions document. Accordingly, the Highwoods geographic area should include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Highwoods geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities and that further opportunities are allowed for mountain bike access and recreation.

#### **G. Rocky Mountain Range Geographic Area – (pages 66-70).**

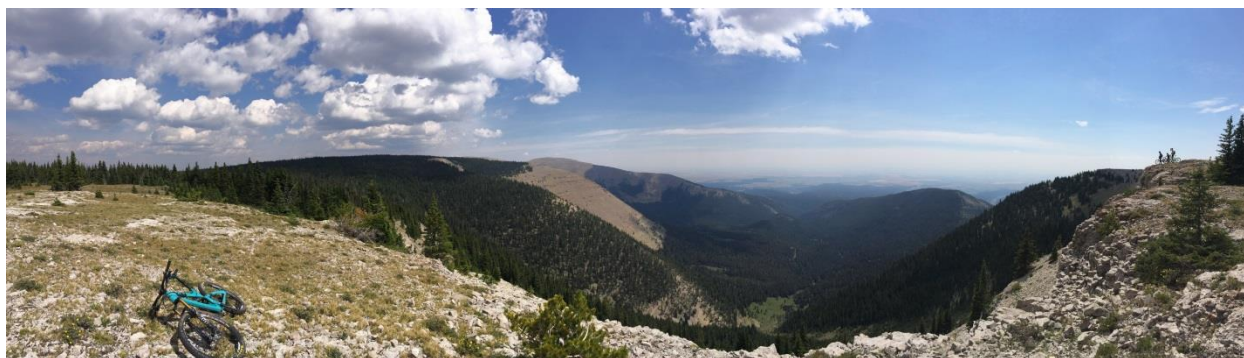
The Rocky Mountain Front Heritage Act of 2013 contains language directing land managers to work with “interested parties” – that is, mountain bike advocacy groups – to identify new bicycling opportunities outside of the Wilderness portions of the area: “Not later than 2 years after the date of enactment of this Act, the Secretary of Agriculture, in consultation with interested parties, shall conduct a study to improve nonmotorized recreation trail opportunities (including mountain bicycling) on land not designated as wilderness within the district.” Rocky Mountain Front Heritage Act, § 7 (emphasis added). Accordingly, mountain bikers are statutorily afforded the opportunity to participate in a forum that will encourage communication and ideas to be brought forward. Several areas along the Rocky Mountain Range, both north and south of Deep Creek, are desirable for trail loops that mountain bikers would enjoy. Even thoughtful new trail connectors could be used to create longer loops that incorporate older existing trails. Rugged areas of the Rocky Mountain Range are spectacular and beautiful, and every area outside of Wilderness, no matter how rugged, should be considered to “improve nonmotorized recreation trail opportunities.” *Id.* Although cyclists would like the opportunity to enjoy the full spectrum of recreational opportunities in the Rocky Mountain Range, these basic considerations should be included as a desired condition.

The Badger-Two Medicine area within the Rocky Mountain Range is a blessing for bicyclists. Because it is both a valued spiritual site for the Blackfoot Nation and a former oil exploration area, it has not been proposed for Wilderness status. Bicyclists are excited that

such a grand area will not be drilled anymore, and that mountain bikes have been an excepted activity there. Badger-Two Medicine has similar qualities – such as its beauty, remoteness, and “wilderness feel” – as Glacier National Park and the adjacent Bob Marshall Wilderness. An interesting item of note is the fact that in the near past, Badger-Two Medicine was patrolled by a bicycle-mounted ranger. We look forward to continuing to ride in the Badger-Two Medicine area. Bicycles are a quiet, non-polluting method of travel suited to traversing wild landscapes and would be an entirely appropriate method of transport while Badger-Two Medicine is managed for traditional tribal cultural use.

It is recognized that although the Rocky Mountain Range includes an “Infrastructure” desired condition relative to “provid[ing] quality motorized and nonmotorized access for multiple uses,” that should be expanded to include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Rocky Mountain Range geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities and that further opportunities are allowed for mountain bike access and recreation.

#### **H. Snowies Geographic Area – (pages 70-72).**



(Photo credit: The Dirt Concern)

The Snowies geographic area attracts cyclists for the same reasons that it attracts hikers and horse riders: it is an island range, erupting from the rolling prairies and breaks, which provide an oasis of coolness during our hot and arid central Montana summers. Mountain bikers reside in all parts of the state, and those in the Lewistown-area particularly value the height and recreational opportunities that the Snowies are able to provide. With no prominent high points, the long, flat crown of the Snowies is a dream-destination for mountain bikers. Exploring the shoulders of the giant cirques of the Snowies geographic area, including the unique Ice Caves found in the area, is a unique treat for cyclists from Lewistown and around Montana.

However, these attributes and qualities do not come without issues. As a Wilderness Study Area, bicyclists necessarily expect restrictions. Within the guidelines of Region One WSA management, and the need to monitor volume of use and the subjective topics of Wilderness character and expectation of solitude, a solution short of exclusion is possible.

Bicyclists ultimately support Wilderness that contains bicycle-friendly boundary adjustments, and creative solutions for non-wilderness corridors that use companion designations to bring permanent protection should be employed.

With this in mind, the Snowies geographic area neither provides for nor states the existence of “multiple uses” or “recreational opportunities” as part of its desired conditions. Without losing sight of the designated area management requirements, these omissions should not be repeated in the Final Desired Conditions document. Accordingly, the Snowies geographic area should include a “multiple uses” desired condition relative to both maintaining existing trails and developing new trails for mountain biking opportunities. Additionally, the Snowies geographic area should include a “recreational opportunities” desired condition relative to providing high-quality mountain biking opportunities and that further opportunities are allowed for mountain bike access and recreation outside of the wilderness study area, so that those areas are preserved for future use.

**I. Upper Blackfoot Geographic Area – (pages 72-75).**

Initially, it should be noted that the town of Lincoln commissioned a comprehensive bicycle plan from the IMBA. This plan identifies many existing and potential trail opportunities in the Lincoln area – which is part of the Upper Blackfoot geographic area. The payoff for developing and promoting a trail system in and around Lincoln would be an economic benefit for the town and its residents. Lincoln is struggling and needs a boost that mountain biking could provide. In turn, this semi-primitive nonmotorized user group would certainly enjoy the creation and expansion of a trail system in the Upper Blackfoot geographic area.

The CDNST in the Alice Creek area near Lincoln is highly utilized by mountain bikers for the same reasons listed *supra*. Mountain bikers should be included among the recreational opportunity uses in the desired conditions for the Upper Blackfoot geographic area. The trail systems at the head of Alice Creek provide mountain bikers a rare opportunity to enjoy a loop by riding up the LCNHT to Lewis and Clark pass, then heading north on the CDNST to Alice Creek. Indeed, the views into the Rocky Mountain Front from this southern vantage are a special privilege. Please consider this a unique characteristic and opportunity to be shared by “bikepackers” (i.e., multi-day mountain bikers), equestrians and hikers alike. This area would not provide the family oriented trails that characterize the planned trails near Lincoln, but would instead lure adventurous cyclists with the promise of rugged backcountry trails and spectacular vistas.

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Respectfully submitted this 15<sup>th</sup> day of January 2016.

**MONTANA BICYCLE GUILD, INC.**

/s/Denny K. Palmer

By: Denny K. Palmer, Director/Secretary  
[denny@montanabicycleguild.org](mailto:denny@montanabicycleguild.org)

mbg: Forest Plan Revision.C1.Desired Conditions

Attachments: Ex. A – Comments Rec'd By MBG at Dec. 10, 2015 Meeting

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EXHIBIT A  
COMMENTS RECEIVED BY THE MBG AT ITS DECEMBER 10, 2015 MEETING

**I. INTRODUCTION.**

The following comments were obtained from 42 different Helena-area mountain bikers that attended the December 10, 2015 meeting hosted by the MBG. The meeting was hosted with the purpose of discussing the Draft Desired Conditions document and getting the mountain bike user group involved with the process. After a general overview of the Forest Plan revision process, including the purpose of this phase relative to its desired conditions, individuals were separated into several small groups to allow discussion of what everyone considered the few items they wanted the HLCNF to address in its Final Desired Conditions document. Participants were then asked to write those items down on paper, which were collected at the close of the meeting. While not everyone submitted written comments, the following represents the comments that were received.

The HLCNF should similarly consider the following comments when completing the Final Desired Conditions document. These comments, however, do not necessarily reflect the views of the MBG; instead, they are provided in attempt to have as many comments of local residents considered by the HLCNF. Thank you!

**II. COMMENTS RECEIVED BY THE MBG.**

**MBG Commenter # 1:**

- Toilet at top of Helena ridge trailhead
- Maintain access
- New trails in greater Helena area, including in:
  - Elkhorns
  - Divide
  - North of Mac Pass
- Mountain bike user group to be included in trail planning

**MBG Commenter # 2:**

- Section 5.6 – Include mountain bike park/resort in paragraph or along with the list regarding ski area, outfitter, etc.

**MBG Commenter # 3:**

- In Helena 10 mile [creek area], plan to open more trails/to bring down user conflict
- Mountain biker voice in actively developing trails
- Clear plan to adding featured bike specific opportunities on existing trails
- Camping within 10 miles of Helena for out of town usage; showers/developed camping, toilets, etc.

- Protection of trail use for bikes on existing trails

**MBG Commenter # 4:**

- No limits/reduction in current access, for all areas
- Expanded trail systems in the Helena/CDT area
- Allow mountain bike user groups to maintain/repair/expand primary use trails/trail systems
- Single direction trails/trail systems

**MBG Commenter # 5:**

- Reserve for future sports and future developments

**MBG Commenter # 6:**

- There were several regions that were included with mountain bike use (Highlands, Elkhorns, and the Divide geographic areas). These are locations that have good mountain biking, and areas that are frequented by many area riders. Consideration should be given to these areas as multi-use. Mountain biking is growing as a sport and should be considered as a forest activity in regards to use.

**MBG Commenter # 7:**

- Making sure that the federal agencies play nice with each other to facilitate better user access and user groups

**MBG Commenter # 8:**

- Allowable to have commercial/guided mountain bike trips on the trails in the forest
- Plan needs to reflect the economic contribution mountain biking has to the state and Helena community
- Plan needs to reflect and allow for future mountain bike development and amenities – similar to ski area (lodging; parking areas)
- Think Haute route in Alps – available to multiple user groups including bikes

**MBG Commenter # 9:**

- Planning should involve user groups, particularly mountain bike groups
- Don't take away inventory of current bike user group trails

**MBG Commenter # 10:**

- Horse, hiker, mountain bike access to include OHV (OHV = advocates with saws that clear, for the good of others)

- Limited access = smaller economic outplay for industry, shops, advocates and recreationalists
- A possible bike/hike park (look at Canada and Park City)
- Advancements to progress in multi-use recreationalists will effectively promote and enhance the Forest Service in general

**MBG Commenter # 11:**

- I would like to see the current trails that are heavily used by bikers more purpose built. I.e., berms, rollers, no tight switchbacks.
- I would also like to see new trails built specifically for mountain biking that are one directional

**MBG Commenter # 12:**

- Keep the trails we have and possibly have some new downhill [mountain biking] ones too. But keep hunting access open too. I'm big into hunting and downhill [mountain] biking. Just love to get out in the mountains and one direction trails

**MBG Commenter # 13:**

- Connect Tucker gulch. Connect trails; Montana City to South Hills
- Gain access to Holmes Gulch

**MBG Commenter # 14:**

- More downhill specific trails with bypasses on big jumps and features with hiking loop options in the Helena area
- Link more trails in the Helena area
- Professionally built downhill [mountain biking] trails
- More trails off of existing trails in the Helena area
- Better built jumps

**MBG Commenter # 15:**

- Year round access is a desired condition
- Mountain bikers need to be more integral to trail design/more influence from in terms of features and berms. Not making trails exclusive but have trails gear toward mountain biking.
- Include local influences in trail design. Partnerships/organizations to help with maintenance and trail building.
- Policy management to protect mountain bike use on existing trails for ski hills, etc.
- More trails built/access to area to area
- Forest Service flexibility to adapt to changes
- More developed trailheads with toilets/campsites

**MBG Commenter # 16:**

- I would love to see more one-way trails in the Helena area! Also, more epic 20+ mile circuit loops in the Lewis and Clark National Forest.
- More berms, more drops, more bike specific “downhill” or gravity trails. I’ve lived in biker friendly communities and appreciate the ability to ride biking designated trails versus hiker/biker. Maybe keeping them separate??
- I love mountain biking!!

**MBG Commenter # 17:**

- I want to see OHV and mountain bike use on the same level
- Single track to remote areas is hard to access and I feel we should work together on access!
- Lets work together to make access for everyone

**MBG Commenter # 18:**

- More quiet trails non-motorized
- More user groups involvement in trail design, construction and maintenance
- Primitive non-motorized recreational opportunities
- Take into consideration wildlife/user group interaction in forest planning

**MBG Commenter # 19:**

- I want to keep the trails we already have
- Get new “Bike Specific” trails introduced to minimize user conflict. [Emphasis in original].