



BLM – Butte Field Office
Attention: Scratchgravel Hills RAMP
106 N. Parkmont
Butte, MT 59701

Dear Mr. Colin,

October 5, 2020

Thank you for the opportunity to comment on the Proposed Action for the Scratchgravel Hills RAMP. Prickly Pear Land Trust (PPLT) has been active in conservation and recreation in the Helena area for over two decades. PPLT has been the primary trail maintenance partner for both the City of Helena and the Forest Service in Helena's South Hills since 2001. PPLT has also been involved in the Scratchgravel Hills project in various capacities over the past decade, including partially funding some of the preliminary outreach, planning, and project design efforts. PPLT believes the Scratchgravel Hills project represents a real opportunity for a community win for non-motorized recreationists of all kinds, while also reducing impacts to homeowners and addressing environmental issues such as noxious weeds.

PPLT members as well as the general public have observed a variety of increased recreational use in the Scratchgravels over the last 5-10 years. This increased use has led to the need for a “managed” trail system in the Scratchgravels that is better designed to accommodate that use, improve the user experience, improve tolerance by adjacent homeowners, and minimize impacts to wildlife and natural landscapes. PPLT supports efforts to improve the recreational and conservation condition of the Scratchgravel Hills and supports the BLM's efforts to develop an improved and sustainable alternative to the current condition. PPLT's Conservation and Recreation Committee (CRC) has reviewed and discussed the RAMP in depth. PPLT has also participated in an ad hoc group consisting of homeowners and recreationists to identify concerns with the current alternatives and identify elements of a third alternative. Based on those reviews and discussions, PPLT does not support either Alternative A or Alternative B; we would encourage the BLM to consider an Alternative C that institutes a level of management and intentionality that is not seen in Alternative A and reduces several problematic components of Alternative B. We have identified our concerns below by Alternative.

Alternative A does not adequately address the change in usage patterns that have occurred in the Scratchgravel Hills. It does not provide opportunity to address user



conflicts, user-created trails, weed management, or trailhead and road maintenance issues.

Alternative B identifies several elements that are designed to address the deficiencies of Alternative A. However, PPLT believes that many of the elements of Alternative B will compromise the success of the effort. As a potential partner in both the implementation and management of this landscape, PPLT believes these elements must be adequately addressed to ensure the long-term sustainability of the project, both in terms of community support and financial stability. In particular, PPLT has the following objections to Alternative B:

E-bikes – In the context of this project and the precedent set by the BLM in the 2009 decision to remove motorized use from the Scratchgravels PPLT recommends that the BLM maintain the recreational uses that were identified in initial project scoping for this project in 2018: mountain biking, hiking, equestrian use, disc golf, and hunting. E-bikes remain, by definition, motorized and PPLT recommends against contradicting the 2009 decision.

Trail Density – PPLT believes that the trail density of Alternative B exceeds a level that is appropriate for the Scratchgravel Hills landscape. PPLT recommends maintaining the total system-wide trail mileage to approximately 50 miles through locating the newly designed trail system on existing routes where appropriate or closing equivalent miles of old trails for every mile of new trail that exceeds the approximately 50 mile total. Trail construction priority should be to utilize the existing footprint where those existing trails are well-designed for sustainable multiple use, or to improve trails on existing routes up to a higher design standard that is suitable for sustained multiple use. Additionally, PPLT recommends that some “double-track” style trails be maintained as “double-track” and not all trails need to be reduced to a “single-track” style. PPLT recommends that all three primary user groups (hikers, bikers, equestrians) maintain access to *approximately* 50 miles of trail, although we do not believe that all of this mileage has to use the same trail footprint that was available to each user group prior to implementation of the RAMP.

Trail Design – In general, it is PPLT’s organizational position that most trails are for most users. Consequently, PPLT supports a multi-use trail design standard that can accommodate the three predominant user groups on the trail system: hikers, mountain bikers, and equestrians. PPLT recommends eliminating



“bike-optimized” language from the design parameters for the trail system as it can be inflammatory, is poorly understood by most users, and alters the perception of the proposed activities. PPLT believes a well-designed, multi-use trail design can address the needs of all user groups, including the creation of enjoyable bike trails, without prioritizing one group over another. PPLT believes that trail design should prioritize user visibility, trail sustainability in terms of maintenance, as well as enjoyment of the user.

As noted, PPLT supports a shared, sustainable, well-designed, multi-use system for most trails. However, it is also our position that some “designated-use” areas or trails are appropriate at a limited scale to reduce conflict among equestrians and bicycles, and to help provide optimal experiences for both groups. Designated-use areas would include uses such as downhill or flow bicycle trails, or equestrian/pedestrian-only trail loops. Exempted from this would be any formal or informal trails associated with the construction of disc golf courses. Finally, PPLT highly recommends the intentional inclusion of accessible trails to provide access to community users who are unable to recreate on the broader Scratchgravel landscape.

Wildlife – Assuming the total mileage of the trail system is reduced from the proposed 80 miles to approximately 50 miles, PPLT believes many of the wildlife concerns would be alleviated because the RAMP indicates that most of those impacts would occur as a result of substantial new trail construction. PPLT recommends reducing the trail density to approximately 50 miles of total, system-wide trail.

BLM Funding – PPLT believes that projects like this are successful only when properly funded and with investment from the land management partner agency. PPLT encourages the BLM to commit to both meaningful annual maintenance funding for the Scratchgravel landscape as well as meaningful funding towards the initial investment in recreational infrastructure. Funding mechanisms and partner support could include sources such as grant opportunities, supporting a trail steward position, or dedicated annual maintenance funds. Regardless of the BLM’s funding mechanism, it has been PPLT’s experience that a sustained, annual investment by a land management agency is: 1) the only means to successfully maintain the project’s investment; and 2) a critical component for leveraging matching funds from outside sources.



Noxious Weeds – PPLT recommends that the BLM prioritize the ongoing land management needs of the Scratchgravel Hills, including management of invasive weeds. Weeds are a constant problem in the Scratchgravels and more funding for proper management is needed. PPLT recommends the adoption of a long-term weed management plan.

Roads and Trailheads – PPLT recommends that the BLM engage in continued local partnerships with neighbors in the area to find a solution to road maintenance as this project will increase the use of roads leading to the Scratchgravels. In addition, PPLT recommends that the BLM incorporate homeowner input to develop and vet specific plans to improve trailhead facilities and road maintenance.

Community Investment – PPLT recommends that the BLM work to maintain good relationships with Scratchgravel neighbors and be responsive to their concerns, including, but not limited to weed management, trespass signage, and road maintenance. Additionally, PPLT believes that long-term success is more likely with broad community support, as such PPLT will continue to promote the creation of a regional parks district to support the initial investment and long-term needs of this project as well as other park lands in the Helena area.

In conclusion, PPLT appreciates and commends the BLM's efforts in bringing this RAMP forward for public input. We believe that this project can be consistent with PPLT's mission "to inspire connections to the landscapes, water, wildlife, recreation, and agricultural heritage of west-central Montana through conservation, now and for future generations."

Our comments identify a number of areas within Alternative B that PPLT believes need to be addressed to ensure the sustainable success of the project. However, we support improved management in the Scratchgravel Hills, and we believe this project has the potential to broadly benefit recreationists in the Helena area while also reducing user impacts to homeowners, ecological impacts from noxious weeds, and minimizing user impacts to wildlife. We encourage the BLM to incorporate our comments along with those received by other community members and groups and develop an Alternative C that has broad community buy-in and can be successful in the long-term.



PPLT has a long history as an implementation and maintenance partner when there is strong community support, thoughtful planning, good partnerships, and investment on the part of the land agency; we hope that this project can achieve that through the development of a widely-supported Alternative C and we are willing to work towards that goal with the BLM and local community groups. Thank you again for the opportunity to comment, we look forward to continued participation as the RAMP is finalized.

Sincerely,
Prickly Pear Land Trust Board of Directors

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