

Mr. Brad Colin
Outdoor Recreation Planner
BLM – Butte Field Office
106 N. Parkmont
Butte, MT 59701

October 5, 2020

Mr. Colin:

Attached to this letter is a consensus recommendation from an ad hoc committee representing several user groups and landowners regarding an Alternative C for the Scratchgravel Hills Recreation Area Management Plan (RAMP).

This ad hoc committee met 7 times between July 16 and September 30. In total the committee invested well over 250 hours studying the RAMP, talking with constituents of our various member organizations, and engaging in challenging and productive conversations in the pursuit of an Alternative C framework that would establish a sustainable management solution in the Scratchgravels, with equity among user groups, reduced environmental impacts, and respect for adjacent property owner rights and concerns.

Specifically, this committee consisted of the following members:

- Eric Grove initiated the ad hoc committee and served as the facilitator. Eric has a long history with, and interest in, management of the Scratchgravels.
- Bev Rankin, Scratchgravel resident, equestrian, and an advocate for homeowner input and access management.
- Sue Mohr, Scratchgravel resident, Secretary Lewis and Clark Backcountry Horsemen, equestrian, and an advocate for homeowner input and access management.
- Mel Griffin, Scratchgravel resident, multi-use trail user, and an advocate for homeowner input and access management.
- Joe Ramler, Scratchgravel resident, multi-use trail user, and an advocate for homeowner input and access management.
- Tony Jewett, representative of Helena Hikes.
- Lisa Bay, representative of Helena Hikes and advocate for equestrian use.
- Eric Sivers, Board President Montana Bicycle Guild.
- Shannon Stevens, board member of Montana Bicycle Guild.
- Lindsey Gilstrap, representative of Helena Trails Alliance.
- Nate Kopp, Program and Trail Director, Prickly Pear Land Trust.
- John Beaver, Board President, Prickly Pear Land Trust.

Our consensus recommendations make clear that we support a change in management within the Scratchgravels. There are numerous concerns under the existing condition that require improved management, including: 1) increased traffic without increased infrastructure; 2) potential for user conflict; 3) lack of equitable access among user groups; 4) impacts to surrounding landowners; and 5) existing landscape degradation. However, our committee found that Alternative A does not address these concerns, while Alternative B would actually worsen several of the existing impacts such as traffic, user conflict, and landscape degradation without appropriately mitigating these effects. Because neither Alternative A nor Alternative B are acceptable to the members of this ad hoc committee, we have worked to formulate an Alternative C framework that we could support rather than simply state what we oppose.

Our attached recommendations for an Alternative C framework include both proposed management attributes as well as proposed trail system attributes. The proposed management attributes have universal support from our committee at a base level. For example, all members agreed that ebikes should be prohibited under the RAMP. We note that the BLM State Director may use discretion to determine that ebikes are not appropriate for certain roads and trails. We urge the BLM to make that determination in the Scratchgravels as ebikes were not included in the scoping process and there is little local advocacy for them. Further, we have fundamental consensus that the BLM needs to be a more active manager within the Scratchgravels by providing funding for the RAMP, trailhead improvements, working with landowners and agencies on road improvements, improving noxious weed management, and increasing the BLM's presence on this landscape through a park ranger/trail steward position as well as additional law enforcement.

Our committee has agreed to support the proposed trail system attributes framework and to then advocate for particular user, or resident, concerns within that framework. For example, all members agreed that trail design should incorporate best practices for their intended design and implementation. Members who represent equestrian interests will advocate to the BLM for what they believe facilitates an optimal equestrian experience. Similarly, members who represent hiking or biking interests will advocate to the BLM for what they believe facilitates an optimal hiking or biking experience. We feel it is important to communicate to the BLM that our group has made progress in discussing more detailed approaches to many of these attributes and we are encouraged by the common ground we identified. Consequently, we urge the BLM to coordinate with the full ad hoc committee to stimulate possible consensus approaches that would aid the BLM in moving forward in a collaborative atmosphere.

We have also recommended some specific trail system attributes that we believe will reduce user conflict, reduce the proposed 80-mile trail footprint, and provide equity to access and experience among users. Two particular attributes that we believe work towards these goals are: 1) a multi-use perimeter trail that provides for separation of user groups where practical and/or to address conflict or safety concerns; and 2) designated-use areas that provides for an optimal equestrian and pedestrian experiences, and a separate designated use opportunity that provides for an optimal mountain bike experience. We have identified some broad components of what

constitutes an optimal experience for user groups; however, as noted, we have agreed that each specific user group, or resident group, will advocate directly to the BLM for particular attributes that define an optimal experience for them.

Thank you for considering this Alternative C framework. While our committee does not represent all users or landowners, we do represent a diverse group that could easily find itself in conflict rather than consensus. We realize that additional work will be required of the BLM, users, and residents to develop a truly viable Alternative C. We urge the BLM to invest in that effort and to meaningfully engage the members of this committee, as well as the larger public, to develop that alternative.

Sincerely,

The Ad Hoc Scratchgravel Hills RAMP Committee

**Scratch-gravel Hills Recreation Area Management Plan:
Alternative C Proposal**

Submitted by Helena Hikes, Helena Trails Alliance, local equestrian representatives, Montana Bicycle Guild, Prickly Pear Land Trust, and homeowners from Silver Creek Estates and Sunny Vista Subdivision

Objective: The following proposal is intended to provide the BLM with a framework for developing an Alternative C option that better addresses the needs of all user groups, adjacent landowners and the local community. We encourage the BLM to work with user groups – equestrian, hiker, and biker – in developing trail use and design features that build toward an optimal experience for each user group, while emphasizing conservation of the Scratchgravel Hills.

Proposed Management Attributes

We recommended that the BLM prioritize the following management attributes ahead of the implementation of trail system attributes.

E-bikes - The BLM will prohibit e-bikes within the Scratchgravel Hills SRMA.

Funding

- ***RAMP Funding*** - The BLM will provide and work closely with local partners to acquire funding to implement and manage the RAMP.
- ***Public Access*** - The BLM should prioritize and expend public funds for trailhead development only where public access is legally ensured, and where it is not, it is the responsibility of the BLM to work in good faith with Lewis & Clark County and homeowners to help find resolution. Currently, Echo Drive is the only major trailhead with clear, established, legal public access and until other access issues are resolved, will provide the primary access and exit from the trail system.
- ***Trailhead Improvements*** - The BLM will design, fund, and implement improvements to major trailheads that better manage user impacts including parking and sanitation. While trailhead improvements are needed at all major trailheads, development will be focused on trailheads accessed by public roads.
- ***Road Improvements*** - The BLM will work with homeowners, local partners, Lewis & Clark County and the Montana Department of Transportation to apply for and utilize Federal Lands Access Program (FLAP) funds to develop long-term maintenance solutions for public access roads to the SRMA. Head Lane will be prioritized for FLAP funding. Additionally, the BLM will

work with homeowners and Lewis & Clark County to create a collaborative approach to sharing responsibility for the maintenance of Head Lane while FLAP funding is being sought.

- ***Park Ranger/Trail Steward*** - The BLM will hire a seasonal park ranger or trail steward to manage and monitor the Scratchgravel Hills SMRA.

- ***Law Enforcement*** - The BLM will increase its Law Enforcement presence for the SRMA when resources allow. The BLM will also develop a cooperative agreement with the Lewis & Clark County Sheriff's Department to increase law enforcement coverage for the SRMA and to help address incidents of vandalism, dumping, and illegal shooting, among other issues.

Noxious Weeds - To reduce noxious weeds in the SRMA, the BLM will increase enforcement of the Montana County Weed Control Act, work to establish Cooperative Weed Management Areas and continue weed control efforts through Cooperative Management Assistance Agreements and other management implementation.

Private Property - The BLM will work with user groups and adjacent private property owners to delineate BLM and private property boundaries in problem areas using signage and, where appropriate, fencing or other barriers.

Proposed Trail System Attributes

Trail Design - The trail system will incorporate best practices in design and implementation. Multi-use segments of the trail system will reflect the needs of all prescribed uses. Trail segments designated for specific uses(s) will reflect the needs of those uses.

ADA Accessible Trail - The BLM will include an ADA accessible trail opportunity within the system. The Norris Trailhead offers relatively flat terrain that could easily accommodate a series of ADA accessible loops of varying length.

Perimeter Trail - The trail system will incorporate a multi-use perimeter trail (i.e. contour trail with relatively constant elevation) that circumnavigates the entire SRMA to provide an extended loop opportunity of low-to-moderate grade. The perimeter trail would be predominantly multi-use but would accommodate the separation of user groups where parallel opportunity exists from designated trails or where topographical relief increases safety concerns. The perimeter trail is intended to provide a uniquely safe and enjoyable experience for all users; it should offer opportunity for bikers, hikers and equestrians to share the trail through a system of etiquette and safe practices by all users, and enforcement by BLM. The intent is to preserve a quality experience for all users. Active use of policies and protocols as identified in the 'Safety and User Enjoyment' section below are essential to realizing this Perimeter Trail vision.

Transecting Trails - The perimeter trail will be supplemented with predominantly multi-use transecting trails to facilitate the opportunity for loops.

Internal Connector Trails - The system will incorporate internal connector trails that are predominantly multi-use but will provide special accommodation for designated routes.

Designated Equestrian Opportunity - The system would include a subsystem of designated equestrian routes that would provide loop opportunities of 1, 2 and 3 hours each in duration, and contain features and design intended to provide an optimal experience for equestrians. For safety purposes, designated equestrian trails would be open to pedestrians but closed to mountain bikes.

Access to Peaks & Designated Mountain Bike Opportunity - There are two prominent peaks within the proposed trail system. These peaks will be accessed by multi-use uphill trails which will also serve as the descending route for equestrians and pedestrians. Mountain bike users will descend on a designated, directional trail that, after getting clear of the summit area, will branch into a separate advanced and a separate beginner route, respectively. Those routes may contain natural landscape features and design elements that optimize the bike experience.

System Length - The overall trail system will be approximately 50 miles in length.

Safety and User Enjoyment - The trail system will utilize trail design, trail policy, education, signage and posted etiquette protocols, and low speed zones to facilitate safe encounters between all trail users and to provide enjoyable, optimal experiences for all users.

Dogs - In addition to standard trail etiquette rules, those recreating with dogs will yield to all other trail users.

Trailhead Congestion - Trailhead congestion is a safety concern for all users. To reduce the possibility of conflict and/or injury, mountain bike and equestrian users will have separate entry/exit points at the major trailheads. The equestrian entry/exit points will connect to designated routes. Pedestrians will be allowed to use all entry/exit points.

Wildlife and Landscape Conservation - Maintain the Wildlife Leave Areas proposed in Alternative B and work with FWP biologists to optimize wildlife benefit associated with these areas. The BLM will consider impacts to wildlife and emphasize landscape conservation in determining trail location and density.

Decommissioning and Obliteration - Existing routes that are not utilized in the new trail system will be decommissioned, obliterated, and revegetated. Education and posted policy will be used to discourage development of social trails.

Existing Roadbeds - Inventoried, existing road beds that are necessary for administrative use form an arterial system that connects most areas and public trailheads within the SRMA. These routes will be integrated into the trail system as designated routes, multi-use routes or both.

