

# **CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)**

**P.O. Box 5295  
Helena, MT 59604-5295**

May 7, 2014

Melany Glossa  
Beaverhead-Deerlodge National Forest  
420 Barrett Street  
Dillon, MT 59725  
[comments-northern-beaverhead-deerlodge@fs.fed.us](mailto:comments-northern-beaverhead-deerlodge@fs.fed.us)

Re: Comments for the draft SEIS to the 2009 Forest Plan

Dear Ms. Glossa,

We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Draft SEIS for the BDNF Forest Plan. We enjoy riding our OHVs on primitive trails and roads within Forest Service lands. Lands managed by the Forest Service provide a significant source of these OHV recreational opportunities. We are passionate about OHV recreation because of the following:

## **Enjoyment and Rewards of OHV Recreation**

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in a healthy and enjoyable sport.
- Opportunity to experience a variety of opportunities and challenges.

## **Acknowledged Responsibilities of Motorized Visitors**

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

We feel that we are representative of the needs of the majority of visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing,

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exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation.

Many federal actions have led to the continual closure of motorized recreational opportunities and access and at the same time the number of OHV recreationists has grown to 50 million. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. We would ask that this project address the following issues. Using this checklist would help identify and address concerns and, hopefully, the needs of the public would be adequately met by implementing a reasonable multiple-use alternative.

Basically in order to address our concerns the project evaluation must address:

1. Most of visitors to the project area visit the forest to enjoy multiple-use opportunities including motorized access and motorized recreation opportunities.
2. Why are motorized recreationists the only ones to lose ground in every action?
3. Where does the public go to replace the motorized access and motorized recreation that will be closed?
4. What is the cumulative effect on the public of this motorized access and motorized recreational closure combined with all other motorized access and motorized recreation closures in the state?
5. The development of a plan to mitigate the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the combined cumulative effect of all other actions in the state.
6. There are no compelling reasons to close as many motorized access and motorized recreational opportunities as proposed. It is simply contrary to the public need in the area and the way that the public uses the forest.
7. There are compelling reasons to maintain and enhance the existing level of motorized access and motorized recreation in the project area.
8. Overall, we are extremely concerned about the unequal allocation of trail resources and we do not see anything in the document that justifies the current imbalance of 33% motorized trails. The current alternative preferred by the Forest Service worsens this imbalance by creating more non-motorized trails. The facts presented in our comments clearly supports a motorized trail allocation of 50% or greater.

The following facts are documented in the information and comments that we are providing:

1. The public has a great need for motorized trails.

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2. The quality of the human environment deserves significant consideration in the analysis and decision.
3. Under existing conditions there are considerably more non-motorized trail opportunities than motorized trail opportunities.
4. The public needs more motorized trail opportunities and not less.
5. The Forest Service has historically proposed and enacted less motorized trail opportunities including the Clancy-Unionville Travel Plan, North Belts Travel Plan and South Belts Travel Plan.
6. Motorized recreationists were the only ones to lose in each and every travel plan.
7. Motorized recreationists are the only one to lose in every travel plan action.
8. The National OHV policy was not intended to be a massive motorized closure process but that is how it is being used.
9. We are concerned about the significant cost of the project versus the use of those funds for maintenance of motorized routes. A better return on the funding in both environmental enhancement and recreational opportunities would be realized by investing the same funding in maintenance of motorized routes. Questions that need to be adequately addressed include:
  - a. For how many years can motorized routes be maintained for public use and benefit versus the cost of new non-motorized trails?
  - b. How much more environmental enhancement could be realized by using the same funding for maintenance of motorized routes including water bars. The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from trails and roads (July 2007 Stream Notes at <http://www.stream.fs.fed.us> ). Many other best management practices are available to control sediment production at demonstrated by the bibliography at [http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road\\_bmp.pdf](http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf) .
10. Lack of funding was used as a reason to close motorized routes. Now the agency is able to readily find funding to create new non-motorized routes. This inconsistency greatly concerns motorized recreationists and we encourage the agency to give the pursuit of maintenance funding a higher priority than the pursuit of new non-motorized trail funding. Environmental justice and socio-economic issues associated with this inconsistency must be adequately addressed.

As documented in our comments, every Forest Service travel planning action has resulted in less motorized access and motorized trails. Motorized recreationists have become extremely frustrated with this disconnect between their needs and Forest Service actions. We often hear others say that the Forest Service is going to close our trails regardless of what we say or do. We are very concerned about the perception of a federal agency with a stated commitment to equal program delivery. We urge the Forest Service to address this significant issue by developing a preferred alternative based on a Pro-Recreation alternative.

A Pro-Recreation alternative is viable and needed by the public. The reasons and issues presented by motorized recreationists including these comments are adequate justification to develop and support a Pro-Recreation alternative. Other motorized recreationists are available to develop and support a Pro-Recreation alternative if the agency would engage them. Again, we urge the Forest Service to address this situation and restore public confidence in the agency by developing and selecting a Pro-Recreation alternative that provides equal program delivery by converting roads to OHV trails, construction new OHV trails and allocating at least 50% of the trails to motorized use.

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We are looking forward to working towards a more reasonable forest plan for the Beaverhead Deerlodge National Forest . We would welcome you to meet and work with our members on the SEIS at any of our meetings. We would also invite you to join us on OHV rides to review and work on routes in the project area.

Thank you for your consideration of our concerns and requests.

Sincerely,

/s/ Action Committee on behalf of our 136 members and their families  
Capital Trail Vehicle Association (CTVA)<sup>1</sup>  
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CC: Dave Koch, President CTVA

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<sup>1</sup> CTVA is also a member of Montana Trail Vehicle Riders Association ([mtvra.com](http://mtvra.com)), Blue Ribbon Coalition ([sharetrails.org](http://sharetrails.org)), and New Mexico Off highway Vehicle Alliance ([nmohva.org](http://nmohva.org)),. Individual memberships in the American Motorcycle Association ([ama-cycle.org](http://ama-cycle.org)), Citizens for Balanced Use ([citizensforbalanceduse.com](http://citizensforbalanceduse.com)), Families for Outdoor Recreation ([ffor.org](http://ffor.org)), Montana 4X4 Association, Inc. ([m4x4a.org](http://m4x4a.org)), Montana Multiple Use Association ([montanamua.org](http://montanamua.org)), Snowmobile Alliance of Western States ([snowmobile-alliance.org](http://snowmobile-alliance.org)), Treasure State Alliance, and United Four Wheel Drive Association ([ufwda.org](http://ufwda.org))

The historic motorized access and recreational opportunities within the Beaverhead Deerlodge National Forest are where we go to enjoy motorized recreation and create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands and we ask that management for multiple-use continue.

We ask that the Draft SEIS for the BDNF Forest Plan adequately address the following pertinent issues:

1. The most equitable management of public lands is for multiple-uses. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as “*The 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...*”. **Outdoor recreation is the first stated purpose of the act.** Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Forest Service has a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.

Public Law 88-657 states that “*the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.*”.

The Federal Land Policy and Management Act of 1976 (FLPMA) states that “(7) *goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; and, (c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;*”.

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable



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coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964.

A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. Legally designated multiple-use lands must not be managed for limited-use instead of multiple-use. This is a significant issue and must be adequately addressed. We request full compliance with multiple-use policies and laws and the development of a Pro-Recreation preferred alternative that will support these policies and laws and the needs of the public.

2. Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at <http://www.trails.idaho.gov/trails/> . Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations.
3. NEPA law requires adequate public disclosure including adequate public involvement, and discussion of potential impacts in the environmental document. NEPA and CEQ guidance includes CEQ Sec. 1500.1 Purpose. *Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses.* In order to adequately meet disclosure requirements the environmental document must include an accurate estimate of the magnitude of the benefit to the natural environment versus an accurate magnitude of the impact including dollars, measures of recreation time and benefit on the human environment. For example, the public needs to know that a salmon run can be increased by 1,000 fish but at an annual loss in energy production of \$10,000,000 for a cost \$10,000 per fish. Another example would be the closure of 50 miles of OHV routes so that 2 lynx are not minimally disturbed resulting in the loss of 5,000 person days of recreation at a value of \$150 per day for a cost of \$750,000 per year. An adequate sense of magnitude must be employed in the impact determinations. This information must be disclosed to the public so that they are adequately informed and can adequately comment on significant issues surrounding impacts on the human environment. Adequate disclosure of this information will also allow decision-makers to better evaluate all reasonable alternatives and make more reasonable decisions based on a realistic sense of magnitude.
4. OHV recreation is extremely popular in Montana. Registration statistics in 2012 show that there are 77,868 OHVs with both plate and OHV stickers, and 69,378 vehicles with OHV

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stickers for a total of 147,606 licensed OHV vehicles. The total number of OHV registrations equates to about one OHV for every 6 residents. Note that many OHVs are used by multiple residents. At 500 miles per year per OHV (a very conservative estimate), the total miles driven per year in Montana would equal 75,000,000 miles. At an average speed of 18 miles per hour, the total hours of OHV recreation per year in Montana is estimated at 4,167,000 hours. <https://doj.mt.gov/driving/mvd-by-the-numbers/2012-total-vehicle-registrations-statewide/>

5. The Government Accounting Office (GAO) has recently released a report with recommendations on long- and short-term improvements that could reduce maintenance backlog and enhance the sustainability of trails on the public lands (<http://www.gao.gov/products/GAO-13-618> ). Specific recommendations include Agency officials and stakeholders GAO interviewed collectively identified numerous options to improve Forest Service trail maintenance, including (1) assessing the sustainability of the trail system, (2) improving agency policies and procedures, and (3) improving management of volunteers and other external resources. In a 2010 document titled A Framework for Sustainable Recreation, the Forest Service noted the importance of analyzing recreation program needs and available resources and assessing potential ways to narrow the gap between them, which the agency has not yet done for its trails. Many officials and stakeholders suggested that the agency systematically assess its trail system to identify ways to reduce the gap and improve trail system sustainability. They also identified other options for improving management of volunteers. For example, while the agency’s goal in the Forest Service Manual is to use volunteers, the agency has not established collaboration with and management of volunteers who help maintain trails as clear expectations for trails staff responsible for working with volunteers, and training in this area is limited. Some agency officials and stakeholders stated that training on how to collaborate with and manage volunteers would enhance the agency’s ability to capitalize on this resource. CTVA has a long history of collaboration on trail construction and maintenance projects that we would like to continue to build on. Additionally, OHV recreation generates millions of dollars in OHV gas tax revenues which should be used to for trail maintenance (Oak Ridge National Laboratory, 1994, Federal Highway Administration, Report ORNL/TM-1999/100, Federal Highway Administration, An 80 page summary of the fuel used for OHV recreation, [http://www-cta.ornl.gov/cta/Publications/Reports/ORNL\\_TM\\_1999\\_100.pdf](http://www-cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf) ). Unfortunately, these dollars are not being applied to OHV trails. Bringing volunteers together with funding would solve nearly all of our OHV trail maintenance needs.
6. The underlying definition of the “environment” that the Forest Service has chosen to use in the impact analyses and decision-making places an emphasis and priority on the “resource” environment in the project area. NEPA was very clear that the total complement of the environment was to be considered in the impact analyses and decision-making including the guiding purpose statement “achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities” (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the resource environment and population or human environment. NEPA was not intended to be used to put an end to human access and use of the resources. However, the Forest Service is using the NEPA process inappropriately by creating significant cumulative impacts on the human environment through a series of travel plan decisions aimed at

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removing the public from public lands. This trend does not conform to Public Law 91-190 and must be corrected by implementing a pro-recreation alternative as part of this action.

7. If further motorized closures of the CDNST are pursued, then a significant issue to motorized recreationists is the re-opening of all CDNST motorized closures enacted to date including Homestake Pass north and south, Bison Mountain North and South, Sugarloaf Mountain, Black Mountain North, Flesher Pass to Rogers Pass, McDonald Pass to Jericho Creek, Bison Mountain, and Thunderbolt Mountain. These motorized closures were enacted without the correct consideration of the requirements of the CDNST enabling law, and CDNST EIS and ROD. They were illegal motorized closures and corrective action must be taken to resolve these past illegal motorized closure actions as part of this decision.
8. Non-motorized reaches of the CDNST receive very little use. Recent inspection of a new non-motorized section of the CDNST near Burnt Mountain in the Beaverhead-Deerlodge National Forest (see photographs) could not find any sign of foot prints or use.



A CTVA member monitored game cameras on a section of the CDNST near Helena for a 3 month period from June to August of 2013. These cameras did not pick up any non-motorized users during this period. At the same time, we have observed that motorized sections of the CDNST see significant motorized use and corresponding benefits. By looking at actual miles traveled and hours spent recreating the obvious best use of the CDNST is for shared multiple-use. This is also true when considering our limited and valuable public taxes and funds. Single-track reaches should be designated for motorcycle and mountain bike use, 48” width areas should be designated for ATV use, and reaches wider than 48” should be designated for UTV and 4x4 use.

9. Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Helena National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use.

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10. We are very concerned about the closure of any motorized routes to create CDNST. The closure of any existing motorized route to create a non-motorized segment of the CDNST was not authorized by the National Trail Systems Act and in the direction given in a policy memorandum by the Deputy Forester in 1997.
11. Specifically, the National Trails System Act (16 U.S.C. 1241) (<http://nplnews.com/toolbox/fedlaws/68nattraills.pdf>) was the authorizing law for Continental Divide National Scenic Trail. The general criteria as stated in the National Trail Systems Act, is that “the use of motorized vehicles by the general public along any national scenic trail shall be prohibited”. However, in the case of the Continental Divide National Scenic Trail (CDNST), an exception is made for “the use of motorized vehicles on roads which will be designated segments” (Section 5 (5), page 2-6). The law also allows uses (including motorized vehicle use) along the CDNST “which will not substantially interfere with the nature and purposes of the trail” where such uses are permitted at the time of designation (Sec. 7 (c), page 2-21).
12. Specifically, the National Trails System Act (16 U.S.C. 1241) provided for “(6) DIVERSIFIED TRAIL USE.—(A) REQUIREMENT.—To the extent practicable and consistent with other requirements of this section, a State shall expend moneys received under this part in a manner that gives preference to project proposals which—(i) provide for the greatest number of compatible recreational purposes including, but not limited to, those described under the definition of “recreational trail” in subsection (g)(5); or (ii) provide for innovative recreational trail corridor sharing to accommodate motorized and non-motorized recreational trail use.  
  
Both sections of proposed trail are outside the wilderness area and would make outstanding shared-use (motorized and non-motorized) trails. Development as shared-use trails would better meet the guidelines of the National Trail Systems Act for “innovative” solutions.
13. Specifically, the National Trails System Act (16 U.S.C. 1241) defined RECREATIONAL TRAIL.—The term “recreational trail” means a thoroughfare or track across land or snow, used for recreational purposes such as bicycling, cross-country skiing, day hiking, equestrian activities, jogging or similar fitness activities, trail biking, overnight and long-distance backpacking, snowmobiling, aquatic or water activity and vehicular travel by motorcycle, four-wheel drive or all-terrain off-road vehicles, without regard to whether it is a “National Recreation Trail” designated under section 4 of the National Trails System Act (16 U.S.C. 1243).
14. The language cited above from the National Trails System Act clearly indicates the intent of the original act. The creation of non-motorized sections of the CDNST by converting motorized sections is not within the intent of the original act.
15. The Beaverhead-Deerlodge National Forest has properly acknowledged the National Trails System Act and has not closed any motorized sections of the CDNST since the CTVA appeal of the Nez Perce trail in 2004. Recent CDNST projects in the BDNF have used the strategy of constructing non-motorized routes parallel to existing motorized CDNST trail

sections. We support this strategy to avoid illegal closure of motorized sections of the CDNST.

16. In too many cases a couple of non-motorized users have been able to displace hundreds of motorized users. It is not reasonable or fair to allow a few non-motorized recreationists to convert a motorized trail used by hundreds of motorized recreationists for their exclusive use. Unfortunately, sections of the CDNST have been created with this approach. This approach must not be perpetuated and past motorized closures should be mitigated.

17. Now the 1997 Policy Letter by the Deputy Chief of the Forest Service (<http://www.mtvra.com/Docs/CNDST%20July%201997%20Memo.pdf>) is being used by the Forest Service to justify conversion of motorized, multiple-use sections of the CDNST to non-motorized use only. Our interpretation of that policy memo is completely different. The 1997 directive to Regional Foresters clearly says that conversion of the CDNST to non-motorized applies only to "newly constructed trail segments" and that reaches of the existing CDNST that use existing roads and trails should continue to accommodate motorized use.

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Forest  
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Washington  
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File Code: 2350  
Route To : \*

Date: July 3, 1997

Subject: Continental Divide National Scenic Trail - Motorized Use

To: Regional Foresters

This memorandum is to clarify Forest Service policy concerning whether the Forest Service may open to motorized use newly constructed portions of the Continental Divide National Scenic Trail (CDNST).

The National Trails System Act ("Trails Act") is ambiguous as to motorized use on the CDNST. Section 7(c) of the Trails Act sets a general standard for prohibiting motorized uses on National Scenic Trails. 16 U.S.C. 1246(c). However, there is special language in subsections 5(a)(5) and 7(c) of the Trails Act referring to motorized uses on the CDNST. That special language provides that motorized use may be permitted on segments of the CDNST where such use will not "substantially interfere" with the nature and purpose of the trail and where, at the time of designation, such use was allowed by administrative regulations.

To clarify our policy regarding newly constructed segments of the CDNST, the following additional direction is provided.

When designated by Congress, the route of the CDNST followed some segments of primitive roads on which motorized vehicle use was allowed. The special language of subsections 5(a)(5) and 7(c) was intended to allow continued motorized use of such roads. However, as the CDNST is further developed, it is expected that the trail will eventually be relocated off roads for its entire length.

It is the intent of the Forest Service that the CDNST will be for non-motorized recreation. As new trail segments of the CDNST are constructed to link existing non-motorized trail segments together, and to reroute the CDNST off of primitive roads or other routes where motorized travel is allowed, motorized use should not be allowed nor considered. Allowing motorized use on these newly constructed trail segments would substantially interfere with the nature and purpose of the CDNST. If any newly constructed trail segments of the CDNST are currently allowing motorized use, that motorized use should be stopped as soon as practicable, but not later than January 1, 2000.

This Office of the General Counsel has reviewed and concurs in this policy directive. Questions or comments about the above direction should be directed to Jim Miller at J.B.Miller:w0lc or by telephone at 202-205-1313.

/s/ Janice H. McDougle (for)

ROBERT C. JOSLIN  
Deputy Chief, NFS

cc: Glacier National Park, Yellowstone National Park, BLM - MSO, American Hiking Society, Continental Divide Trail Society, Continental Divide Trail Alliance

18. Past NEPA action which addressed continued motorized use of the CDNST is being completely ignored by the Forest Service. The Decision Notice and Finding of No Significant Impact for Continental Divide National Scenic Trail Montana-Idaho Section dated April 7, 1989 established that 795 miles would be designated CDNST in Idaho and

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Montana. This document can be downloaded at <http://www.mtvra.com/Docs/1989%20CDNST%20Decision%20Notice.PDF> and <http://www.mtvra.com/Docs/1989%20CDNST%20Decision%20Notice%20Maps.PDF>. The decision also established that 510 miles out of the 795 miles would be open to motorized travel. Out of the remaining 285 miles, approximately 222 miles are in designated wilderness areas and would be non-motorized and the remaining approximately 63 (59 identified in the decision notice) miles would be newly-constructed trail. Therefore, we ask that the 510 miles of motorized CDNST established by the 1989 decision be honored as part of the Draft SEIS for the BDNF Forest Plan.

19. Additionally, the Regional Forester in a letter dated February 1, 2006 (<http://mtvra.com/Docs/Kimbell%20Letter%20CDNST%20Feb%201%202006.PDF>) committed that “As the travel management process goes forward it is likely that some portions of the CDT will be certified to remain motorized. If we complete a NEPA document (including public involvement) that results in a decision to remove motorized from the CDT, we will make every effort to develop alternative motorized routes.” This commitment to no net loss of motorized recreation along the CDNST is extraordinarily important to motorized recreationists and must be honored by this project.
20. If motorized recreationists had trails of regional and national significance, they would see considerable use. Non-motorized recreationists have considerably more national trail recreation opportunities than motorized recreationists. We request that the needs of motorized recreationists for regional and national travel ways be evaluated. We request an evaluation of the cumulative negative impacts and environmental justice issues surrounding the lack of regional and national motorized trails for motorized recreationists. We request that regional and national motorized recreational trails be identified and actions be taken to implement those trails.
21. There is a significant equal opportunity issue associated with the CDNST that must be evaluated and resolved in a manner that is fair to motorized recreationists.
22. The thousands of motorized recreationists that use existing motorized sections of the CDNST should not be displaced for a handful of non-motorized recreationists that use the trail. Preferential treatment for non-motorized recreationists must cease and mitigation for past motorized closures must be implemented. Mitigation for past motorized closures should include those motorized routes closed in the past to create a non-motorized section of CDNST trail including McDonald Pass to Telegraph Creek and Flesher Pass to Rogers Pass.
23. There is not enough existing motorized access and motorized recreational opportunities on our public lands including the project area to meet the needs of the public as documented by both agency reports and comments (search for need, visitor, %) that we provided during the process. The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States ([http://www.fs.fed.us/recreation/programs/ohv/OHV\\_final\\_report.pdf](http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf)) determined that out of the total population in Montana 29.1% participated in OHV recreation. The U.S. census determined that the population in 2005 was 935,670 (<http://quickfacts.census.gov/qfd/states/30000.html>). Therefore, the number of OHV

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recreationists in Montana is 935,670 times 0.291 = 272,280. There are simply not enough OHV opportunities to meet the needs of this population yet there are millions of acres of multiple-use land including the project area that are suitable for that use.

24. It would be a huge step backward for society if we had to comment on every foot of road, water line, sewer pipe, sidewalk, and motorized trail that the public needs. Gauging public need by the number of comments is not the norm in our society and should not be used in this process.
25. Specific NVUM data for the Beaverhead-Deerlodge National Forest shows that there were 1,377,000 total site visits to the forest and only 15,000 wilderness visits ([http://www.fs.fed.us/recreation/programs/nvum/revised\\_vis\\_est.pdf](http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf)). Therefore, wilderness visits in the Beaverhead-Deerlodge National Forest are 1.09% of the total visits yet past decisions in Region 1 and the proposed forest plan by the Beaverhead-Deerlodge National Forest have produced both a disproportionately large and an increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 99% of the visitors are associated with multiple-uses. The public votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit regardless of whether they provide comments in a cumbersome NEPA process.
26. The NVUM and Southern Research Station reports cited later in our comments prove that there are 400,707 OHV visitors to the Beaverhead-Deerlodge National Forest and 15,000 wilderness visitors. The ratio of trail users is 26.71 motorized to 1 non-motorized yet the balance of existing trails is 33% motorized to 67% non-motorized. Clearly there is an imbalance of opportunity that justifies more (not less) motorized recreational opportunities. For this reason, we strongly recommend and support the development of a Pro-Recreation Alternative.
27. There is an estimated 400,707 OHV visitors to the Beaverhead Deerlodge National Forest each year. At 20 miles per visit, OHV visitors log a total of 8,014,140 miles on OHV routes. We have observed that there is significantly more construction and maintenance provided for non-motorized trails in the Beaverhead Deerlodge National Forest when compared to motorized trails and the amount of use that they receive. As a result, non-motorized trails are in better condition and there are more miles of non-motorized trail per user. Construction and maintenance efforts for motorized trails should be at least equal to that expended on non-motorized trails. This inequity is a significant issue that must be adequately addressed. As required by NEPA, the evaluation and document must disclose the dollars expended annually in the Beaverhead Deerlodge National Forest for construction and maintenance efforts for motorized trails and non-motorized trails. The decision must move in the direction of a motorized trail system that is equal to the non-motorized trail system. The decision must also move in the direction of an equal allocation of maintenance dollars.
1. Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the Beaverhead-Deerlodge National Forest. Therefore, every mile of existing road and motorized trail is very, very important. The evaluation must adequately consider and address the fact that motorized access to the Beaverhead-Deerlodge National

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Forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles of motorized trails are exceptionally inadequate for the thousands of OHV recreationists looking for those opportunities. Additionally, the miles of motorized trails and especially single-track is way out of balance with the needs of thousands of motorized recreationists in the region surrounding the Beaverhead-Deerlodge National Forest. At the same time, the miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available. The total route opportunity available to non-motorized recreationists is 7192 miles and the total miles of exclusive non-motorized trails are 1855 (67.16%) and the cross-country miles are infinite. The total miles of roads open to motorized recreationists are 4057 and the total miles of trails open to motorized recreationists is 907 (32.84%) and the miles of cross-country opportunity is zero. Existing motorized single-track trails total about 293 miles or 10.61%. Note that this data is at least 5 years old and does not reflect significant motorized closures that have occurred in the last 5 years.

Given the number of motorized recreationists and the miles of routes available, it should be very obvious that motorized recreationists are already squeezed into an inadequate system of routes.

Under the existing condition, 11.21% of the Beaverhead-Deerlodge National Forest is set-aside for segregated exclusive non-motorized use for 1.09% of the visitors to the forest. The remaining 98.911% of the visits are associated with multiple-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. In order to reasonably meet the requirements of integration a reasonable management goal for the remaining 88.79% of the forest would be for shared multiple-use that would produce a forest-wide 50/50 sharing of non-motorized/motorized trail opportunities and correct the current imbalance as shown in the table below.

The overall allocation of **existing** non-motorized versus motorized access and trail riding opportunities in the Beaverhead-Deerlodge National Forest is a **does not reasonably meet** the needs of the public for motorized access and the recreational needs of motorized recreationists. We request that this data be used to guide the decision-making to a preferred alternative that adequately meets the needs of the public by **increasing motorized recreational opportunities** in the project area.

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
1	Beaverhead-Deerlodge	Madison	705,985	Existing	12/7/2006	613	520	675	171	45	0
1	Beaverhead-Deerlodge	Wisdom	426,760	Existing	7/8/2006	538	504	569	268	134	0
1	Beaverhead-Deerlodge	WiseRiver	451,647	Existing	7/8/2006	445	428	452	183	127	0
1	Beaverhead-Deerlodge	Butte	164,270	Existing	12/8/2006	339	336	64	58	11	0
1	Beaverhead-Deerlodge	Jefferson	422,982	Existing	12/8/2006	585	559	258	180	70	0
1	Beaverhead-Deerlodge	Dillon	568,539	Existing	7/9/2006	818	757	271	50	0	0
1	Beaverhead-Deerlodge	Pintler	639,856	Existing	12/9/2006	1,092	1,053	473	197	106	0
<b>Totals</b>			3,380,039			4,430	<b>4,067</b>	2,762	907	293	0
							Miles of Open Road per Square Mile =	0.92			
							Total Roads and Trails Open to Non-Motorized Use, Miles	<b>7,192</b>			
							Non-Motorized Trails, Miles =	<b>1,855</b>			
							Non-Motorized Trails, % =	<b>67.16%</b>			
							Motorized Trails, miles =	<b>907</b>	<b>293</b>		
							Motorized Trails, % =	<b>32.84%</b>			
							Trails Open to Motorcycles %		<b>10.61%</b>		
<a href="http://www.fs.fed.us/recreation/programs/ohv/">http://www.fs.fed.us/recreation/programs/ohv/</a> <a href="http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf">http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf</a> <b>Totals Revised per Forest Plan -100 miles of road, -200 miles of trails</b>											

NOTE: This data is out of date by at least 8 years and does not reflect significant motorized closures that have occurred since this table was put together.

In order to bring equality to the allocation of non-motorized to motorized trails in the Beaverhead-Deerlodge National Forest must either convert 474 miles ((2762/2)-907) of non-motorized trails to motorized trails or 948 miles (1855-907) of new motorized trail must be constructed. The current forest plan does not adequately address this imbalance and it would be a step in the wrong direction and would create an even greater imbalance.

28. Collaboration is defined by Merriam-Webster as “to cooperate with or willingly assist an enemy of one’s country and especially an occupying force”. It is not reasonable to use a collaboration process to award non-motorized interests with more non-motorized opportunities for their participation in a “collaboration process” when they already have a significant unjustified advantage in non-motorized trail opportunities when compared to motorized trail opportunities. Moreover, it is not equitable to use a process that is pre-determined to provide one group or selected group’s additional advantage with the outcome of the process when that group or groups has a significant advantage at the initiation of the process. Therefore, in order to address this inequality any collaboration efforts used in the process must be directed to address creating more motorized trails and the outcome of any collaboration efforts must be an increase in motorized trails.

29. While we do not support segregation, if segregation is to be implemented on multiple-use lands (which must be considered public places), then a corresponding goal would be to demonstrate an absolutely perfect 50/50 sharing of non-motorized and motorized trails as part of that segregation. Therefore, if the proposed plan further promotes segregation on multiple-use lands, then it must include a corresponding 50/50 sharing and it must not tip the balance further in favor of non-motorized trails and at the expense of motorized routes.

30. It is not reasonable to reward recreationists who create and promote a culture of non-sharing on public lands.

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31. A reasonable alternative based on reasonable expectations for sharing and a 50/50 balance or equal non-motorized to motorized trail opportunity should include:

- a. Sharing non-motorized trails with mountain bikes and motorcycles,
- b. Creating new mountain bike and motorcycle trails,
- c. Creating ATV trails from roadbeds that both currently open and closed,
- d. Creating new ATV trails
- e. Creating new ATV trails that connect with converted roadbeds to create loops, and,
- f. Establishment of 4x4 challenge trails using roadbeds that are both currently open and closed including historic mining routes.

32. The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use.

33. The loss of 200 miles high quality motorized routes in the Beaverhead Deerlodge National Forest and all of the surrounding national forests is not a reasonable alternative given the historic use of these routes and the needs of the public for access and motorized recreation. Specifically, the closure of 200 miles of high quality motorcycle single-track and ATV trail under the forest plan does not adequately address the issues and the needs of the public for these routes. The reasons used are completely unreasonable. Motorcycles



can negotiate and prefer to use trails of the same specifications as hiking and pack stock trails. This proposal does not reasonably acknowledge or consider that motorcycle riders are; willing to share, practice Tread Lightly, have maintained these trails for years, would rather ride their motorcycles on single-track trails and have developed the skills necessary to ride a motorcycle on single-track trails. We are very concerned about the lack of understanding of the needs of single-track motorcycle riders and the complete disregard for their needs. We ask that this very important issue be adequately addressed in the document.

34. We request that the analysis include a benefit-cost analysis of any new CDNST trail construction. This analysis should include the annual cost of the CDNST per actual and documented non-motorized trail user. The economic analysis should also compare the annual benefit-cost per non-motorized user versus the annual benefit-cost per motorized user if the funds were used elsewhere to construct motorized trails. Basically the funding proposed for non-motorized trail construction under the proposed alternative would see far more use if used for motorized trail construction and maintenance. Additionally, this

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funding could be part of a mitigation plan required to address the significant cumulative effects of all motorized trail closures on motorized recreationists. These are significant issues that must be evaluated.

35. Motorized trail users out-number non-motorized trail users at least 25 to 1 (see summary of local observations). Motorized recreationists need approximately 5 times the miles of trail per day compared to non-motorized recreationists (CBU analysis). Therefore, motorized recreationists need 125 times (25 x 5) the miles of trails as do non-motorized recreationists. However, the current allocation of resources in the forest is significantly weighted towards non-motorized and is no where near this ratio. Additionally, the allocation is moving in the wrong direction towards more non-motorized opportunities with every recent decision. Construction of new CDNST trail for exclusive non-motorized use is not a good use of the taxpayer's money. Additionally, the proposed CDNST project will benefit a very limited number of recreationists who already have more than adequate recreational resources when compared to motorized recreationists. It would be more reasonable for the Forest Service to focus on multiple-use trail projects and invest our limited financial resources in those types of projects. These are significant issues and we request that the viable alternative of putting the project money into multiple-use trails be adequately evaluated.
36. The benefit-cost analysis should also recognize the significant economic benefit associated with motorized recreation. Motorized economic benefit would far exceed the economic benefit from the limited number of non-motorized recreationists that use the CDNST. Economic benefits to the local economy associated with motorized recreation include sale of OHVs, parts and service; sale of tow vehicles, parts and service; sale of camping units, parts and service; fuel; meals; motels, etc.
37. It is our understanding that some interests are pushing the wildlife corridor concept and trying to associate it with the CDNST as a reason to close areas to motorized use. We have not seen adequate documentation or reasoning to justify this position and suspect that it is being used inappropriately as a reason to justify defacto wilderness by non-motorized interests. Significant issues must be answered before this concept can be given any credibility. Issues include:
  - a. Why would wildlife follow physically challenging basin divides where food and water is scarce versus other corridors? They don't. This is easily verified by open areas such as McDonald Pass or the jagged areas of the continental divide where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossings that we have observed in other areas that are more favored by wildlife.
  - b. Where is the documentation that the continental divide or other basin divides are favored for wildlife migration? Especially theories that purport that wildlife will migrate from Mexico to Canada. This is counter-intuitive to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support these claims.



- c. The lack of authorization or mandate from congress.
  - d. The socio-economic issues associated with the attempt to use the wildlife corridor concept to convert multiple-use lands to defacto wilderness.
38. One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where “several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS.” *Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1312 (9th Cir. 1990)). A cumulative effect is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 18 40 C.F.R. § 1508.7.
39. A starting list of actions that should be evaluated in a cumulative effect analysis is included at the end of this letter.
40. Any closure of the CDNST to motorized recreationists represents yet another significant loss of recreational opportunity for multiple-use and motorized recreation interests. The uncontrolled, unmeasured, undisclosed, and immensely significant cumulative effect on multiple-use and motorized recreationists must be considered as part of this CDNST action. Therefore, the Continental Divide National Scenic Trail act must be re-considered based on the current state of significant negative cumulative impacts on motorized recreationists.
41. The requirement for non-motorized sections in the original CDNST in the National Trails System Act was precipitated by un-restricted noise levels that were prevalent at that time. The motorized recreational industry and motorized recreationists have addressed this issue by implementing mechanical mitigation measures that have significantly reduced sounds levels and effectively addressed and eliminated this concern. Additionally, the State of Montana has passed a sound testing and enforcement law (MCA 61-9-418, 61-9-435, and 61-9-518) which further diminishes this issue. Therefore, the requirement for non-motorized sections of the CDNST should be re-considered.
42. It is our understanding that at the time of creation of the CDNST that there were about 719 miles of CDNST trail in Montana and 596 miles were motorized, multiple-use. The 1997 Policy Letter by the Deputy Chief of the Forest Service to Regional Foresters clearly says that conversion of the CDNST to non-motorized applies only to "newly constructed trail segments" and that reaches of the existing CDNST that use existing roads and trails should continue to accommodate that motorized use.

43. We are concerned that any conversion of the CDNST in Montana will have a significant negative impact on motorized access and motorized recreation. We are very concerned that adequate NEPA compliance including an adequate mitigation plan is not be carried with any conversion of the CDNST from motorized to non-motorized. Conversion of sections of the CDNST from motorized to non-motorized is a very significant federal action and is subject to NEPA compliance. However, NEPA compliance for this decision has not been addressed. Also, a policy that is this different from the authorizing legislation is not legal. We respectfully ask that the agency address this lack of authorization, and NEPA compliance surrounding the conversion of the CDNST from motorized to non-motorized.
44. We request an adequate evaluation of the cumulative negative impact on motorized recreation and access opportunities that occurs when motorized routes are converted to non-motorized routes to establish the CDNST because we believe that they are significant. We request a network of national recreation trails for motorized recreationists equivalent to the Continental Divide Trail (CDT), Pacific Crest Trail, National Recreation Trail and other national non-motorized trails that travel a long distance and interconnect with other forests such as the Michigan Cross Country Motorcycle Trail 1200 miles ([http://www.fs.fed.us/r9/hmnf/pages/Recreation/Baldwin/bwc\\_Oo\\_atvmoto\\_txtonly.pdf](http://www.fs.fed.us/r9/hmnf/pages/Recreation/Baldwin/bwc_Oo_atvmoto_txtonly.pdf)), Pacific Crest Quest (<http://www.advrider.com/forums/showthread.php?t=111885>), Lassen Backcountry Discovery Trail (<http://www.backcountrydiscoverytrail.com/index.html> and [http://www.intergate.com/~sue/4wd\\_Trails/cbdt\\_lassen/lassen\\_cbdt.htm](http://www.intergate.com/~sue/4wd_Trails/cbdt_lassen/lassen_cbdt.htm)), the Modoc Backcountry Discovery Trail (<http://www.fs.fed.us/r5/modoc/recreation/ohv/mcbcdt.shtml> and [http://www.intergate.com/~sue/4wd\\_Trails/cbdt\\_modoc/modoc\\_cbdt.htm](http://www.intergate.com/~sue/4wd_Trails/cbdt_modoc/modoc_cbdt.htm)), and the Idaho Centennial Trail ([http://4x4stories.typepad.com/4x4/2007/01/idaho\\_centennia\\_7.html#more](http://4x4stories.typepad.com/4x4/2007/01/idaho_centennia_7.html#more)). The interest and adventure of long-distance cross-country trips is captured in trip reports including <http://www.quadtrek.net/> (click English) and <http://www.advrider.com/forums/showthread.php?t=147232>.

If motorized recreationists had trails of regional and national significance, they would see considerable use. Non-motorized recreationists have considerably more national trail recreation opportunities than motorized recreationists. There is a significant fairness issue involved with this decision. We request that the needs of motorized recreationists for regional and national travel ways be evaluated. We request an evaluation of the cumulative negative impacts and environmental justice issues surrounding the lack of regional and national motorized trails for motorized recreationists. We request that regional and national motorized recreational trails be identified and actions be taken to implement those trails.

45. We acknowledge the value of solitude and point out that there are many acres of wilderness/non-motorized/exclusive-use available to provide that solitude. Our concern is in regards to the diminishing amount of multiple-use lands and the unreasonable concept that multiple-use lands should be managed as wilderness/non-motorized/exclusive-use lands. Managing multiple-use lands by wilderness criteria and for perfect solitude does not meet the communal needs of the public and is not a reasonable goal for multiple-use lands.
46. The opportunity for solitude must be reasonably balanced with the multiple-use needs of the public. For example, the Montana Standard in an article on December 14, 2000 reported that

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hikers on the Continental Divide trail “walked for 300 miles without seeing another human being”. This article illustrates a significant long-distance interstate recreational opportunity available to non-motorized visitors and the negligible use that it sees. Additionally, we have been camping in the Telegraph Creek drainage for 27 years and we have met only 2 people using the CDNST in that area.

47. It is not equitable to provide recreationists seeking solitude and wilderness experiences exclusive access to tens of millions of acres and thousands of miles of non-motorized trails while restricting the public seeking multiple-use opportunities access to an inadequate road and trail system. In other words, it is not reasonable to allow a very limited group of individuals who do not want to meet other people to displace thousands of motorized recreationists. We request an equitable and balanced allocation of motorized access and recreational opportunity.
48. In contrast, a long-distance interstate recreational opportunity similar to the CDNST does not exist for OHV recreationists. It is not equitable to provide recreationists seeking solitude and wilderness experiences exclusive access to tens of millions of acres and thousands of miles of non-motorized trails while restricting the public seeking multiple-use opportunities access to an inadequate road and trail system. We request an equitable and balanced allocation of motorized access and recreational opportunity.
49. We have seen a low level of use used as a factor to close motorized routes. This criterion should also be applied equally to non-motorized routes. For example, a low level of use by motorcycles was used as a reason to close the Nez Perce and Mormon Gulch trails in the Beaverhead-Deerlodge National Forest. This same reason should be used to open up non-motorized trails such as the CDNST that experience a low level of use to more public use by allowing motorized use.
50. We are willing to share all existing motorized routes with all forest visitors. Sharing of resources by all forest visitors is a reasonable expectation for all lands outside of designated wilderness areas.
51. The list of projects in Table 2 demonstrates that motorized routes are all too commonly closed for exclusive non-motorized use. The proposed action continues this massive trend. The Forest Service looks out for the interests and needs of non-motorized interests and is willing to create many miles of new non-motorized trails as demonstrated by the proposed project. We respectfully request the same cooperation between the Forest Service and a recreation group be extended to motorized recreationists. We respectfully request the same attention to our needs by the Forest Service. Additionally, considerable OHV grant money and OHV gas tax money is available to fund motorized projects.
52. A reasonable alternative instead of all motorized closures is a sharing of resources. A reasonable alternative for accomplishing this can be done in all project segments by designating alternating weeks for motorized and non-motorized use. The schedule can be communicated to the public by signs at each end of the trail segments, newspaper articles, and through local user groups. This alternative eliminates any reasonable concern about

conflict of users (which we think is over-stated and over-emphasized for self-serving reasons).

53. We suspect that real user conflicts are minimal or non-existent. We request documentation of the user conflicts in the project area and request that this information be categorized and weighed against the overall number of visitor-days to the area.
54. The National Recreational Trails Advisory Committee identified trail-user conflicts on multiple-use trails as a concern that needed attention. The Committee worked with the Federal Highway Administration to produce a report ([https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV\\_191.67\\_T7M66\\_1994.pdf?sequence=1](https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV_191.67_T7M66_1994.pdf?sequence=1) ) to promote a better understanding of trail conflict, and identify approaches for promoting trail-sharing. The goal of the report was to promote user safety, protect natural resources, and provide high-quality user experiences. It reviews management options such as trail design, information and education, user involvement, and regulations and enforcement. The report found very sound ways to promote cooperation and understanding among trail users and presented ideas that will help reduce conflict on multiple-use trails. The report provides 12 principles for minimizing conflicts on multiple-use trails and we ask that each of these principles be incorporated into the management plan.
55. All of the project areas are designated as multiple-use lands by congress and should be managed as such. The proposed action does not promote multiple-use of these areas and must be modified to meet those requirements as discussed in the attachment.
56. Any motorized closures resulting from this action must be adequately mitigated in order to avoid adding to the significant cumulative effects that motorized recreationists have experienced. The proposed does not provide any mitigation for the proposed motorized closures and as such, the proposed action does not adequately address this issue.
57. The typical use of public lands and the typical needs of the public in our region are described on Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002 ([http://www.fs.fed.us/r1/b-d/forest\\_plan/revision/reports\\_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf](http://www.fs.fed.us/r1/b-d/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf) ). This document reported that the total number of forest visitors in Forest Service Region 1 for year 2000 was 13,200,000. The total number of wilderness visits was estimated at 337,000 or 2.55%. Therefore, millions of visitors to public lands (nearly all at 97.45%) benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations of visitors enjoying motorized access and mechanized recreation on public lands.
  - a. An important note, agency planning staff has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.

- b. The total number of individuals that visit our national forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service, November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% (56 million/286 million) of the total U.S. population actually visits our national forests. This number needs to be used as the denominator (baseline) for total forest visitors.
- c. Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech which stated “Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000.” We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (<http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf>). This document reports that the total number of OHV users has grown to 49.6 million by the fall 2003/spring 2004. Based on the 2000 estimates OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).
- d. This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000) titled Outdoor Recreation Participation in the United States (<http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf> ) which asks the question “During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?” The percent responding “Yes” was 63.1% and the total number in millions was estimated at 130.8 million.
- e. Additionally, NSRE summaries are often referenced by the agency but the summary statistics are skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation and if they are added together they are as large as any other group in the survey which correctly demonstrates the magnitude of motorized recreation.
- f. Additionally, the Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States ([http://www.fs.fed.us/recreation/programs/ohv/OHV\\_final\\_report.pdf](http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) ) determined that of the total U.S. population 27.3% participated in OHV recreation and that out of the total population in Montana 29.1% participated in OHV recreation. It appears that the study is diluting the actual percentage of OHV recreationists by using total population and not the population actually visiting and using the forest. As discussed above only 20% of the total U.S. population visits the forest. The percentage of Montanans that actually visit our national forests is higher than the national average and is estimated at ½ of the total state population (conservatively high). Based on this conservative estimate, about 60% (29.1% x 2) of the actual visitors to Montana national forests participate in OHV recreation.

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g. These surveys and data demonstrates the significant popularity of motorized and OHV recreation and the tremendous public support and need for motorized and OHV recreational opportunities. We maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the national forest visiting the forest 5 or more days per year. The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities. OHV registrations in Montana grew by 24% from 2004 to 2005 (<http://www.snowtana.com/News/Stories/OHVregister.html> ) and have continued to grow since then.

58. Additionally, specific NVUM data for the forests in our area, specifically the Beaverhead-Deerlodge, Caribou-Targhee, Gallatin, and Helena National Forests shows that there were 6,191,000 total site visits to the forests and only 85,000 wilderness visits ([http://www.fs.fed.us/recreation/programs/nvum/revise\\_vis\\_est.pdf](http://www.fs.fed.us/recreation/programs/nvum/revise_vis_est.pdf) ). Therefore, wilderness visits in our region is only 1.37% of the total visits yet every decision by the Forest Service has produced both a disproportionately large and an increased number of recreation opportunities for wilderness visitors and at the expense of the multiple-use and motorized visitors. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit.

Forest	All Site Visits (000's)	Wilderness Visits (000's)	Wilderness Visits (%)	Multiple-Use Visits (%)
Beaverhead-Deerlodge	1,377	15	1.09%	98.91%
Caribou-Targhee	2,656	21	0.79%	99.21%
Gallatin	1,650	46	2.79%	97.21%
Helena	508	3	0.59%	99.41%
<b>Total</b>	<b>6,191</b>	<b>85</b>	<b>1.37%</b>	<b>98.63%</b>
<a href="http://www.fs.fed.us/recreation/programs/nvum/revise_vis_est.pdf">http://www.fs.fed.us/recreation/programs/nvum/revise_vis_est.pdf</a>				

59. In addition to the studies cited above, we have observed that 97% of the visitors to multiple-use areas are enjoying multiple-use activities based on motorized access and motorized recreation as shown in Table 1.

Table 1

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS										24-Dec-13	
Date	Motorized Vehicles Access (Note 1)	OHV/Snow	FWD/Woodc	MTN Bike	Equestrian	X-C Skiers	Hikers / Runners	General Area/Comment	Vehicles at Hiking Trailhead (Note 2)	National Forest	
1999	5	342	37	11	10	0	25	See specific years and notes below	0		
2000	11	223	49	26	3	7	15	See specific years and notes below	0		
2001	433	425	58	28	36	3	12	See specific years and notes below	15		
2002	626	499	87	72	23	7	23	See specific years and notes below	46		
2003	904	651	17	66	18	10	27	See specific years and notes below	26		
2004	869	571	62	21	13	19	11	See specific years and notes below	35		
2005	1,322	847	89	38	29	6	20	See specific years and notes below	80		
2006	990	655	55	21	7	0	35	See specific years and notes below	18		
2007	948	603	27	42	22	17	2	See specific years and notes below	69		
2008	1,437	690	38	39	10	30	24	See specific years and notes below	12		
2009	1,227	894	85	35	7	17	4	See specific years and notes below	59		
2010	1,352	1,037	49	11	2	26	16	See specific years and notes below	5		
2011	1,194	766	80	16	14	9	14	See specific years and notes below	7		
2012	1,072	758	44	17	4	8	15	See specific years and notes below	15		
2013	1,000	673	47	15	0	0	29	See specific years and notes below	2		
Column Total	13,390	9,634	824	458	198	159	272		389		
Total Observations on Multiple-Use Lands									24,935		
Mechanized Total				24,306	Non-mech Total			629			
Mechanized %				97%	Non-Mech %			3%			

Note 1: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 1: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 1: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of use but are not counted because they are not visiting multiple-use lands.

Data Source: Capital Trail Vehicle Association

Our observations of recreationists on multiple-use public lands from 1999 through 2013 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 24,935 observations, 24,306 recreationists or 97% of the visitors were associated with motorized access and multiple-uses. Additionally, of the total number of people visiting public lands, 39% (9,634 / 24,935) were associated with OHV recreation. **Furthermore, and most importantly, out of the 10,721 (9634 + 458 + 198 + 159 + 272) visitors that we observed using trails, 9,634 or 90% were OHV recreationists and 1,087 or 10% were non-motorized recreationists which includes mountain bikes which are a form of mechanized travel, Therefore, the use of trails is 8:1 motorized versus non-motorized and the use of all routes is 13:1 mechanized versus non-motorized.** Therefore, nearly all (97%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations. **Therefore, 90% of the trail users are motorized and 94% when including mountain bikes which enjoy using the same trails. Therefore, in order to be reasonably responsive to the needs of the public at least 90% to 94% of the trails system and public land should be managed for multiple-uses including motorized access and recreation.**

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60. Out of the 24,935 recreationists that were observed, 272 were hikers and all of the meetings were pleasant. We have not experienced any user conflict in 15 years of observations.
61. The agency does not observe visitors on weekends and holidays and consequently is unaware of actual visitor usage. The agency simply needs to go out and count the different recreationists and mode of access on multiple-use lands on any weekend. This is what we have done and our data is an accurate representation of actual visitor usage on multiple-use lands. Additionally, the public comments and votes by how they use the forest, and our observations document that more motorized access and recreation is what they are asking for with every visit. We are quite confident that if Forest Service staff road a dual-sport motorcycle around the forest on multiple-use roads and trails during the weekends and recorded their observations that they could duplicate this data and the conclusions found in the table above. We feel very strongly that the current approach and data used by the agency to represent the historic public use of multiple-use lands does not provide an accurate representation and that the table of observations above is a more reasonable representation.
62. There is a serious inaccuracy between the agency's representation of motorized versus non-motorized trail use and actual trail use that must be resolved. The routes in the project area are predominantly used by motorized recreationists. We see this actuality every weekend. Site specific trail use observations such as ours must be used and will easily justify motorized use of all existing routes.
63. Therefore, over 97% of the public land should be managed for multiple-uses including motorized access and mechanized recreation. However, over 50% of the public land is managed by wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access and motorized recreation. The Final Roadless Rule published on January 5, 2001 ([http://roadless.fs.fed.us/documents/rule/roadless\\_fedreg\\_rule.pdf](http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf)) specifically stated "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use.
64. The new Forest Service rule for forest planning has determined *The environmental review has documented that writing management plans has no effect on the environment, which qualifies the individual plans of each National Forest for categorical exclusion from individual study under the National Environmental Policy Act. ....Under the 2005 planning rule, full environmental analysis will continue at the project level where public involvement and the best available science can inform on the ground decision-making.* (<http://www.fs.fed.us/news/2006/releases/12/ce-statement.shtml>) The basis for this guidance is that from here forward forest plans will not produce any significant changes from the existing condition and if a proposed future action does produce significant impact it must include specific analysis and public input developed as part of that project. Additionally, any guidance found in the forest plan must yield to the site specific project analysis. Therefore, the role of the forest plan has been greatly diminished and guidance from the forest plan

must not be cited as reasons for justifying a proposed course of action, i.e., convert an area or route from motorized to non-motorized. This direction is to come from the analysis of a specific proposed action

([http://www.helenair.com/articles/2007/01/01/montana/ao510101\\_2.prt](http://www.helenair.com/articles/2007/01/01/montana/ao510101_2.prt) ). Therefore, the use of “consistency with the forest plan” is no longer a valid reason to close motorized recreational resources and only site specific data and reasons should be used to address motorized recreation needs and resources.

65. Given the evidence in support of continued use of existing motorized routes and the need for additional motorized routes, any proposed CDNST alternative that would close motorized routes is clear evidence that the agency is predisposed to motorized closures despite the needs of the public and the facts. We strongly support the position that no existing motorized routes should be closed as part of the CDNST based on the evidence submitted.
66. Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Helena National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use and this significant issue must be considered in the analysis.
67. The needs of the aging baby boomer population and their desire for adequate motorized access and motorized recreation is a significant issue that is brought up continually at our monthly meetings and in many discussions with other motorized recreationists. This significant issue must be recognized and given a hard look in the Purpose and Need, adequately addressed as part of the human environment and adequately addressed by the development of a reasonable Pro-Recreation alternative.
68. An excellent reference is Tom Crimmins and NOHVCC booklet titled Management Guidelines for OHV recreation which can be downloaded at <http://atfiles.org/files/pdf/crimminsNOHVCC.pdf>. Other good references for OHV recreation can be found in the American Trails library at <http://www.americantrails.org/resources/motors/index.html> and on the NOHVCC web site at <http://www.nohvcc.org/home>.

In conclusion, as discussed in our comments it is very important that any proposed CDNST alternatives not close any existing motorized routes. Additionally, there is a gross imbalance of trail opportunities in the Beaverhead Deerlodge National Forest with many more non-motorized trails than motorized trails. The proposed Draft SEIS for the BDNF Forest Plan would add further to the imbalance. We believe that the trail funding would be better used to address the current imbalance of trail opportunities by creating motorized trails with the goal of a 50/50 balance and equal

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opportunity. Additionally, motorized trails will see many more person-hours of use. We are looking forward to an equitable decision for the Draft SEIS for the BDNF Forest Plan.

Thank you for your consideration of our comments.

Table 2  
 Partial list of Current and Immediate Past Actions With  
 Significant Cumulative Impact on Multiple-Use/Motorized Recreation

Route Designation process (all forest on a fast track schedule)	BLM Rocky Mountain Front Scenery Evaluation Project
All past, ongoing, and future Forest Service Travel Plans ( <a href="http://www.fs.fed.us/recreation/programs/ohv/">http://www.fs.fed.us/recreation/programs/ohv/</a> ) (hundreds of actions).	BLM Kanab Resource Management Plan
All past, ongoing, and future BLM Resource Management Plans and Planning (hundreds of actions)	BLM Miles City Resource Management Plan
Rocky Mountain Front legislation December 2006	BLM Price Resource Management Plan
United States Court Of Appeals for the Ninth Circuit No. 01-35690 D.C. No. CV-96-00152-DWM (inter-agency) Grizzly Bear Recovery Plan	Bitterroot National Forest Travel Plan
(inter-agency) ICBEMP	Bitterroot NF Fire Salvage EIS
(inter-agency) Northern Rockies Lynx Amendment	Bitterroot NF Post-fire Weed Mitigation EIS
(inter-agency)3-States OHV Strategy	Bitterroot NF Sapphire Divide Trail
B-DNF Norton Creek Trail Relocation	Bitterroot NF Forest Plan Revision
B-DNF Cataract Creek Road and Trail Closures	Boise NF Mountain Home RD Travel Plan
B-DNF Continental Divide Trail near Jackson, MT	Bridger-Teton NF Travel Plan
B-DNF Whitetail Pipestone Travel Plan	Caribou NF Travel Plan
B-DNF Forest Plan Update	Clearwater NF Travel Plan
B-DNF Analysis of the Management Situation	Custer National Forest Beartooth RD Travel Plan
B-DNF Continental Divide trail near Feely	Custer National Forest Sioux RD Travel Plan
B-DNF Continental Divide trail near Whitetail-Pipestone	EPA Tenmile Creek Watershed Plan
B-DNF Social Assessment	Flathead NF Robert Wedge Post Fire Project
B-DNF Mussigbrod Post Fire Roads Management	Flathead NF West Side Reservoir Post Fire Project
B-DNF Trail #313 and Mormon Gulch Closure	Flathead NF Forest Plan Revisions
B-DNF & BLM Flint Creek Watershed Project	Flathead NF Moose Post Fire Road Closures
Big Horn NF Forest Plan Revision	Flathead NF Spotted Bear Road Closures
BLM Vernal Field Office RMP	Flathead NF Spotted Bear Travel Plan
BLM Monticello Field Office RMP	Gallatin NF 2002 Travel Plan Update
BLM Richfield Field Office RMP	Helena NF Whites Gulch Closure
BLM Blaine County Recreation and Travel Plan	Helena NF Figure 8 Route Closure
BLM 6 RMPs in Western Oregon	Helena NF Blackfoot Travel Plan
BLM Price Field Office RMP	Helena NF Blackfoot Water Quality Plan
BLM Owyhee Travel Management Plan	Helena NF Cave Gulch Fire Salvage Sale
BLM All existing management plans and travel plans	Helena NF Clancy-Unionville Plan
BLM Owyhee Management Plan	Helena NF North Belts Travel Plan
BLM Blackleaf Project EIS	Helena NF North Divide Travel Plan
BLM Dillon Resource Management Plan	Helena NF Noxious Weed Plan
BLM Headwater Resource Management Plan	Helena NF South Belts Travel Plan
BLM Arizona Strip Travel Plan	Helena NF South Divide Travel Plan
BLM Bruneau Resource Area Travel Plan	Helena NF Continental Divide National Scenic Trail
BLM Escalante Grand Staircase Monument	Humboldt Toiyabe Travel Plan
BLM Missouri Breaks Monument	Humboldt Toiyabe NF Charleston-Jarbidge Road
BLM Moab Resource Management Plans	Humboldt Toiyabe NF Spring Mountains NRA
BLM National OHV Strategy	Kootenai NF Bristow Restoration Project
BLM National Mountain Biking Strategic Action Plan	Kootenai NF McSwede Restoration Project
BLM San Rafael Travel Plan	Kootenai NF Forest Plan Revisions
BLM Sleeping Giant Travel Plan	Lolo NF Forest Plan Revision
BLM Whitetail/Pipestone Rec. Management Strategy	L&CNF Little Belt Travel Plan
BLM Lake Havasu RMP	L&CNF Judith Restoration Plan
BLM Sustaining Working Landscapes Initiative	L&CNF Rocky Mountain Front Travel Plan
	L&CNF Snowy Mountain Travel Plan
	L&CNF Travel Plan update
	Mt Hood National Forest Travel Plan
	Wallowa-Whitman NF Travel Plan
	Wasatch-Cache NF Logan Ranger District Travel Plan
	Montana State Wolf Plan

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Montana State Trail Grant Program PEIS  
Montana State Trail Plan PEIS  
Montana FWP Statewide Outdoor Recreation Plan  
Nez Perce NF Designated Routes and Areas  
Nez Perce NF Travel Plan Revisions  
NPS Salt Creek Road Closure  
NPS Yellowstone Winter Plan (snowmobile closure)  
NPS Glen Canyon NRA ORV Management Plan  
Payette NF Travel Plan Revisions  
Rogue Siskiyou NF Travel Plan  
San Juan National Forest Travel Plan  
Sawtooth NF Travel Plan Revisions  
Shoshone NF LRMP  
USFS Continental Divide National Scenic Trail  
(<http://www.fs.fed.us/r2/trails/cdnst/> )  
USFS All existing forest plans and travel plans  
USFS National OHV Policy and Implementation  
USFS Forest Plan Amendments for Grizzly Bear  
Habitat Conservation

USFS National Strategic Plan 2003 Update  
USFS Roadless  
USFS Roadless Rule II  
USFS Roads Policy  
USFS Open Space Conservation Strategy and  
Implementation Plan  
USFS National Land Management Plan Revisions  
USFWS Bull Trout Recovery Plan  
USFWS Westslope Cutthroat Trout ESA  
USFWS CMR National Wildlife Refuge Road Closures  
USFWS Sage Grouse Plan  
USFWS Rocky Mountain Front Conservation  
Easements  
Central Idaho Economic Development and Recreation  
Act (CIEDRA)  
National Landscape Conservation System Act - S. 1139  
Northern Rockies Ecosystem Protection Act HR 1975

**Table of Cumulative Effects on Motorized Recreationists**

Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000						FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails**		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000						FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000						FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700						FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Butte RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009
Helena area		52.2	9.8	42.5	81.42%	No		
Blackfoot TP	376,000	**					FS	Ongoing
Divide TP	155,000	**					FS	Ongoing
Custer NF Beartooth TP	580,000						FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP	437,000	**					FS	Ongoing
Custer NF Sioux TP	436,000	**					FS	Ongoing
Bitterroot NF TP	1,589,000	**					FS	Ongoing
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000						FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000						FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000						FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**					FS	Ongoing
Lolo Forest Plan	2,083,000	**					FS	Ongoing
WMPZ Forest Plan	6,043,000	**					FS	Ongoing
<b>Subtotal</b>	<b>50,494,925</b>	<b>39,413.3</b>	<b>28,343.3</b>	<b>11,068.7</b>	<b>28.08%</b>	<b>No</b>		
<b>Other Significant Measures of Closed Motorized Opportunities</b>								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
All completed, ongoing and reasonably foreseeable FS Travel Plans	192,300,000	192,300,000	??	??	??	No	FS	
All completed, ongoing and reasonably foreseeable BLM RMP and Travel Plans	258,000,000	258,000,000	??	??	??	No	BLM	
<b>Notes:</b>								
* estimated impact								
** underway with expected significant impact								
*** additional impact associated with significant loss of quality trails and substitution with roads								
**** number of snow machines								
***** All motorized trails closed								

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