

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)

**P.O. Box 5295
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May 10, 2014

Melany Glossa
Beaverhead-Deerlodge National Forest
420 Barrett Street
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Re: Comments for the Beaverhead Deerlodge Forest Plan SEIS

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 Beaverhead Deerlodge Forest Plan SEIS. We enjoy riding our OHVs on primitive trails and roads in the Beaverhead-Deerlodge National Forest. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities. We are passionate about OHV recreation for the following reasons:

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.
- Camaraderie and exchange of experiences.
- For the adventure of it.

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

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input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, 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.

Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100, <http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=>). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision.

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 and at the same time other outdoor activities have declined 18 to 25% (Journal of Environmental Management 80 (2006) 387–393, <http://www.redrockinstitute.org/uploads/PNAS.pdf> and <http://www.msnbc.msn.com/id/22998037/>). OHV registrations in Montana grew 24% from 2004 to 2005. Multiple uses of the forest are minimized every time a forest plan or travel management plan comes up for action. 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. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the Beaverhead Deerlodge Forest Plan SEIS. We would ask that this project address the attached checklist of issues and address the goals and needs identified. Using this checklist will help identify and address concerns and, hopefully, the needs of the public will be adequately met by implementing a more reasonable multiple-use alternative.

The project area with its current level of motorized access and recreation is where residents from southwest Montana go to enjoy motorized recreation. The project area is where we go and what we do to 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. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails.

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Our comments document that the current management trend towards massive motorized closures (25 to 75% of the existing routes) is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management directives specified by congress. The agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors. The agency can no longer ignore the needs of motorized recreationists and act irresponsibly by continuing to close a large percentage of existing motorized access and recreation opportunities. The agency can no longer ignore the need for new motorized recreational opportunities. The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists. We cannot tell you how many times we have met motorized recreationists (many of them families from the project area) and they have asked us "What is going on?" This question will be even more prevalent if the travel plan is pushed by the public in a short time frame. In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.

As shown in the attached comments, there is a great shortage of ATV and motorcycle trails in the Beaverhead-Deerlodge National Forest. 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. The proposal by the Beaverhead-Deerlodge National Forest does not meet this definition of a Pro-Recreation Alternative. A Pro-Recreation Alternative would include the following characteristics in addition to the current proposal:

1. We are very concerned that the current text and maps does not adequately and easily disclose the motorized routes to be closed. Order to meet NEPA requirements for adequate public disclosure, each alternative map must show each motorized route that is proposed to be closed. The standard used in many travel plans has been to show those motorized routes proposed to be closed by an alternative with red lines. The tables for each alternative also need to clearly identify an each existing motorized route that is proposed to be closed.
2. Dispersed camping within 300 feet of all existing routes.
3. Use of seasonal closures, where required, to protect the environment and wildlife with the intention of keeping routes open for the summer recreation season.
4. All of the existing routes are needed as OHV routes due to the cumulative effects of all other closures.
5. Additional OHV routes are needed to address the growing popularity of OHV recreation and the greater needs of the public for access and motorized recreation.

6. In order to reasonably meet the needs of the public for motorized recreational opportunities we request that the proposed alternative include the following:
 - a. Interpretative routes to preserve the mining heritage in the area.
 - b. Provides the type of long-distance figure 8 routes, loops and side destinations desired by OHV recreationists
 - i. Loops ranging from 20 to 60 miles
 - ii. Many stops and side destinations
 - iii. Documents and preserves the historic nature of the area
 - iv. Additional use of dual-use routes so that OHVs can connect with trails systems.
 - v. Grants could be used for signing at each site and the development of interpretative literature, brochures, and maps.
 - vi. Grants could be used where required for route improvements.

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 in the Beaverhead-Deerlodge National Forest. The current alternative preferred by the Forest Service worsens this imbalance by eliminating high quality 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 have provided:

1. The public has a great need for motorized trails.
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 proposed less motorized trail opportunities.
6. Motorized recreationists are the only ones to lose in this proposal.
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 road decommissioning 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 decommissioning them?
 - 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 .

10. Lack of funding was used as a reason in to close motorized routes. Now the agency is able to readily find funding to decommission 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 decommissioning 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 and allocating at least 50% of the trails to motorized use.

We are looking forward to working towards a more reasonable travel management plan for the Beaverhead Deerlodge National Forest. We would welcome you to meet and work with our members on the forest plan 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)¹
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¹ CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org),. Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org)

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CC: Dave Koch, President CTVA

Information and Issues That Support A Pro Motorized Recreation Alternative

May 10, 2014

1. While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the 1976 Act modified or repealed. Until the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The decision rendered by the 10th circuit re-affirms this (<http://www.kscourts.org/ca10/datefile/datefile.htm> look under 9-8-2005, and then 04-4071 - Southern Utah Wilderness Alliance v. Bureau of Land Management). The court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. The Beaverhead-Deerlodge National Forest includes many important RS 2477 routes that were established by miners, loggers, and early settlers. We request that this project include adequate research of the county records and adequate formal consultation and coordination with the county to identify RS 2477 routes and include them as historic motorized routes.
2. 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.*”.

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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 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.

3. A program similar to the following is needed to help the agency better understand the needs of motorized single-track trail riders which have been ignored in the analysis.

Single Track Summit - AZ State Park OHV Program

Arizona State Parks Off-Highway Vehicle Program is excited to host this first ever event focused on bringing riders and land managers together to understand the unique trail requirements of motorcycle riders, building partnerships between rider groups and agencies, developing project proposals, and how to pay for all this work using YOUR OHV Fund. Everyone should leave this event with knowledge and contacts to help develop single track opportunities statewide.

Please join us for what will prove to be a productive day with just enough fun stuff sprinkled in to make it exciting. We have a video short on single track riding, GoPro footage of local technical riding, and will screen the recently released adventure riding film about the Arizona Backcountry Discovery Route. Plus we will have some motorcycles on display that are used for single track riding and adventure touring.

SINGLE TRACK SUMMIT SCHEDULE OF EVENTS

Saturday 8:00am - 9:00am: Continental Breakfast and check-in
9:00am: Summit Kickoff & Morning Presentations
noon - Lunch and screening of the Arizona Backcountry Discovery Route
1pm Afternoon Presentations & Meet the Land Managers
4pm Summit Wrap Up

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Presenters

Coconino National Forest & Coconino Trail Riders - The Kelly Canyon Experience
Trail Riders of Arizona - Developing Partnerships
Bureau of Land Management - Project Design and Long Distance Connections
Arizona State Parks - Making it Rain, Project Funding Mechanisms and Doing Business
with the State
Tonto Recreation Alliance - Keys to Being a Good Partner
Surprise Guests

Sunday (optional)

Trail Ride - Location to be determined, bring your own motorcycle

4. 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.
5. 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.
6. 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 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/>. At a value of \$25 per hour the total value

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to the economy on Montana is \$104,175,000 and the share attributable to the Beaverhead Deerlodge National Forest and surrounding area is a significant part of the local economy.

7. Using a conservative estimate of 30 miles per visit and an average speed of 18 miles per hour, 400,707 OHV visitors to the Beaverhead Deerlodge National Forest travel 12,021,210 miles (400707 x 30) and recreate at least 667,000 hours on their OHVs. The magnitude of these values indicates a significant need for OHV routes and a significant value in the use of those routes.
8. Grizzly bears in the greater Yellowstone ecosystem have a varied diet and are minimally affected by the decline in the number of whitebark pine trees, federal research found. The findings were presented Thursday in Bozeman at a meeting of the Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee. The subcommittee voted 10-4 to accept the research findings. It also gave preliminary approval to a motion that recommends the U.S. Fish and Wildlife Service remove federal protections for the bears, currently listed as "threatened." Grizzly bears are minimally affected by the supply of pine nuts and the federal protections grizzlies are in the process of being removed. Therefore, grizzly bears should not be used to close motorized routes and opportunities.
http://billingsgazette.com/news/state-and-regional/montana/research-grizzlies-not-so-dependent-on-pine-nuts/article_c2f5c901-65ad-5d5a-a975-f40864cbc563.html
9. The final 3-States OHV Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>) included graphic examples of ATV and motorcycle single-track trails that must be adequately identified and addressed as part of the required site specific analysis for each and every road and trail as part of the environmental analysis for any future travel planning. We request that all routes currently in use be identified in the analysis using the pictures included in the final decision.
10. In 2011 two-thirds of Americans, or nearly 212 million, lived in counties beset by wildfire smoke two years ago, according to the analysis by the Natural Resources Defense Council. "It affects a much wider area of the United States than people realize," says author Kim Knowlton, an NRDC senior scientist and Columbia University health professor, adding the smoke can drift up to hundreds of miles. She says the smoke contains fine-particle air pollution and can not only cause asthma attacks and pneumonia but also worsen chronic heart and lung diseases. The health impacts can be dire. The 2003 wildfire season in southern California resulted in 69 premature deaths, 778 hospitalizations, 1,431 emergency room visits and 47,605 outpatient visits, according to a study led by Ralph Delfino of the University of California, Irvine.
<http://www.usatoday.com/story/news/nation/2013/10/24/wildfires-smoke-climate-change-harm-health/3173165/>
11. 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

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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.

12. Additionally, OHV recreation generates millions of dollars in OHV gas tax revenues which should be used to for trail maintenance (see additional comments and 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). 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.
13. The use of “unauthorized trails or roads or user-created routes” is not an appropriate term as many of these routes were created during periods going back to the 1800's when the forest was managed without designated routes, cross-country travel was allowed, and access and use of the forest was encouraged. Many of these routes have been used for decades and are “historic routes”. Many of these routes are shown on versions of the forest map, and 7.5 minute and 15 minute USGS quadrangle mapping. The use of “unauthorized trails or roads or user-created routes” is an inaccurate representation of the management conditions and uses allowed in the past. These are also terms developed by non-motorized interests that have been given an inaccurate negative connotation through their campaigns. We request that this term be dropped from the text and that these routes be recognized as appropriate routes in the analysis.
14. 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 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.
15. 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>.

16. The proposed action does not adequately consider that there are hundreds of miles of non-motorized trails available to the public in the immediate area. The balance of recreational opportunity must recognize the availability of the non-motorized trails in the adjacent wilderness area. Because the adjacent non-motorized trails were not adequately factored in to the analysis, the proposed balance of recreational opportunities does not adequately address the needs of motorized recreationists. Because of the vast wilderness areas already designated, the entire remaining multiple-use lands in the Beaverhead Deerlodge National Forest area should be managed for multiple-uses. This significant issue and a reasonable alternative to address it were not adequately considered.
17. Motorized recreationists value high quality trails with views, vistas, and challenging riding.
18. Because of the significant number of motorized visits to the forest and significant issues associated with motorized closures (both points are documented in our comments and the comments of other motorized recreationists), the preferred alternative must not reduce motorized opportunities. Moreover, in order to address the issues and needs of the public, a reasonable preferred alternative would provide for an increase in motorized opportunities.
19. In order to be legally defensible the following two tests must be used to identify any proposed motorized route closures: 1) the proposed closure of a motorized route must be based on site specific data and documentation of actual significant impacts caused by motorized recreation, and 2) the documented impacts from motorized recreation must be substantially more significant than naturally occurring events.
20. Because of the significant negative cumulative impact of all motorized closures and if the two tests outline above are met, then a reasonable alternative that must be included for public input is a trade of the closed motorized route for a motorized route of equal opportunity and value in a different location.
21. Southwest Montana is struggling with the existing economic conditions which confirm that an economy based largely on wilderness recreation will be limited. Further decisions that force the economy to rely solely on wilderness and non-motorized recreation will move the area in a direction that will result in further economic hardship. At the same time, Southwest Montana contains a significant amount of land intended for multiple-use. Managing for reasonable multiple-use on all federal lands would allow the Southwest Montana to further develop an economy based on snowmobile recreation in the winter and OHV recreation in the summer which would bring better economic conditions to the area. This concept would not infringe on wilderness and is an entirely reasonable alternative. Therefore, a Pro-Recreation Alternative must be developed for the Beaverhead Deerlodge Forest Plan. Southwest Montana could become as successful Marysvale, Utah area (<http://www.marysvale.org/>) which is based on the Paiute trail and the Caliente and Pioche, Nevada area which is based on the Chief Mountain and Silver State Trail systems (<http://nvtrailmaps.com/trail.php?trail=708>). These trail systems bring

in thousands of motorized recreationists who buy lodging, meals, parts, fuel, and goods in adjacent towns. The lack of adequate OHV and snowmobile access and opportunities in the Southwest Montana area was brought into focus by the recent controversy over the closure of the highway borrow ditches. When snowmobiles and OHVs are forced to use the highway borrow ditches confirms that there are inadequate motorized recreational opportunities in the area. This is not a desirable nor equitable situation and especially when considering the thousands of acres of multiple-use land in southwest Montana. These and other reasons support a hard look at a reasonable Pro-Recreation Alternative for the Beaverhead Deerlodge Forest Plan.

22. Southwest Montana and the Beaverhead Deerlodge National Forest are popular areas for motorcycle single-track trail riding. There are many enthusiasts in the Butte, Dillon, Bozeman, Great Falls, Helena, and Missoula areas that travel to visit the project area. Motorized single-track trails need to be provided in the proposed action. This is a significant need and the significant issue associated with not addressing this need has not been adequately addressed.

23. Motorized recreationists support the use of mountain bikes. A reasonable alternative would be to share the proposed new mountain bike trails with motorcycles. Both vehicles create and use the same “single-track” trail foot print. As proposed there are no motorcycle trails. Furthermore, based on our experience keeping trails free of downfall in the last 5 years, mountain bikers without chainsaws will not be able to maintain the trail system and it will not be functional. For example, on our last outing to the Helmville-Gould trail at the end of the season last fall, we had to remove 50-60 downed trees to get through even though it was late in the season. The Brooklyn Bridge route in the Clancy-Unionville area is another example of a route that is becoming closed by downfall. Motorcyclists would be quite willing to help build and maintain a motorcycle/mountain bike single-track trail system. This is a reasonable alternative that must be adequately addressed.



24. Illegal closures of motorized sections of the Continental Divide trail must be addressed by this action. The Beaverhead-Deerlodge Forest Plan should re-evaluate that closure and mitigate for that illegal closure by re-opening this section of CDNST to motorized recreationists as required by the original legislation. Further documentation of this significant issue is provided in a separate set of comments.

25. Cumulative effects of locked gates that now prevent public motorized access. This is an ever increasing issue that now significantly affects the public.

http://helenair.com/news/state-and-regional/locked-gates-prevent-access-to-national-forest/article_0428b09d-0fa2-516c-a989-e5738c8aee9a.html?print=true&cid=print

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http://helenair.com/news/local/road-accessing-national-forest-land-gated-locked/article_f9d0dbde-4655-11e2-a8d3-0019bb2963f4.html?print=true&cid=print

26. Elk Cover Requirements. Elk do well in places like Nevada without trees. Additionally, elk were originally a plains animal and survived just fine without trees. Effective elk hiding is provided by mountains, hills, ravines, ridges, rocks, brush. These land factors must be incorporated into the elk hiding cover equation. Recent analysis by the Helena National Forest for the Elkhorn Wildlife Management Area has demonstrated that a reasonable consideration of the topography in the area would meet the requirements for elk security. This reasonable and realistic approach to elk cover and wildlife security requirements must be part of the Beaverhead Deerlodge Forest Plan SEIS analysis.
27. Additionally, wolves have radically changed elk behavior and use of tree canopy. Elk now avoid tree cover because the cover allows wolves to prey upon them easier. Elk now prefer open areas where they can “keep an eye” on the wolves and defend themselves. Therefore, tree cover is not a significant benefit to elk at this time and this changed condition must be recognized.
28. Therapy – The treatment of stress or disorders, as by some remedial, rehabilitating, or curative process. Unfortunately, there is a significant need for OHV opportunities for therapy for our wounded warriors. We have found that riding OHVs can be some of the best therapy available for those that have served our country in the armed forces and now have a need for a curative process
29. Held to an Unnatural Standard – air quality, water quality, impact on fish and wildlife, level of erosion. Fires, floods, natural levels of erosion all produce far greater impacts on air quality, water quality, and fish and wildlife. Motorized recreationists are being held to an unnatural standard which clearly indicates a grievous bias. Impacts associated with motorized recreation including sedimentation and disturbance of wildlife are being judged as significant when in reality they are less than the natural level of sedimentation and impacts on wildlife associated with fires and floods. Being held to a level of impact that is less than the natural level is proof of a strong bias in the evaluation process and arbitrary and capricious decision-making.
30. Impact Assessment. With respect to impact assessment, if you cannot measure an impact then it is not a real impact. Impacts associated with beetle killed trees and fires are acceptable to the agency. OHV impacts are minimal when compared to beetle killed trees and fires.
31. Motorized recreationists are being squeezed out of the high quality places on our public lands including high elevation mountains, high elevation lakes, and other scenic areas. This trend has created significant socio-economic issues including equal access and cumulative effects that must be adequately addressed and mitigated as part of this action.
32. A video produced by Carl Adams presents many of the significant issues and concerns that are frequently expressed by members of our club and other motorized recreationists in the community. http://www.youtube.com/watch?v=0kUhLMi97dg&feature=g-user-lik&context=G23216abUCGXQYbcTJ33bB0U1oCKl_9bcFlhATY2tUW6mr0rddyBQc

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33. 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 Bureau of Land Management and Forest Service have 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 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 motorized trails and snowmobile areas 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.



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34. 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.
35. Since 1988, forest fires have eliminated many motorized roads and trails. These losses have occurred due to deadfall, re-growth, and loss of trail tread associated with the forest fire. These losses are occurring with every fire. For example, the motorcycle single-track trail #418 from Snowbank Lake to Stonewall Mountain and road #771 the Snow-Talon fire area in the Lincoln Ranger District of the Helena National Forest has been lost to motorized use. Motorized losses due to forest fires are occurring in every National Forest in our area. The loss of motorized opportunities from fires has become a significant cumulative impact and issue to motorized recreationists. The cumulative loss and negative effect on motorized recreationists due to loss of recreational opportunities due to fires within the project area, forest and region is a significant issue that must be evaluated as part of this travel plan. The evaluation should also address mitigation measures necessary to reduce the significant impact of losses due to fires on motorized recreationists.
36. The final OHV Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>) required site-specific analysis as part of the route designation process. Motorized recreationists agreed to accept the rule on this basis. Site-specific analysis was mentioned 11 times throughout the rule and this project must meet the requirements for site-specific analysis.
37. An adequate site-specific analysis should include monitoring and quantification of existing motorized use versus non-motorized use, types of motorized use and visitors, and effects of motorized closures on the quality of the human environment. Examples and goals of site-specific analysis include: 1) single-track trails should be designated for motorcycle and mountain bike use, 2) 48" width routes areas should be designated for ATV use, 3) routes wider than 48" should be designated for UTV and 4x4 use, 4) open riding areas should be designated for trials bikes which have different riding area requirements than trail riding, and 5) motorized trail systems should be provided for all skill levels and types of popular motorized vehicles so that the needs of all motorized users are adequately addressed. Site-specific analysis in the motorized route designation process should also adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. We ask that motorized recreationists be adequately queried as part of the site-specific evaluation process and that the site-specific conditions that they identify be considered as required by the Final OHV Rule.
38. The Forest Service Travel Management Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>), was presented to OHV recreationists as a "route designation" process that would designate motorized routes for the appropriate type of motorized use (motorcycle, ATV, UTV, 4x4, etc.). Some form of route designation was referred to 404 times in the final rule. The rule did not state that it would be a huge motorized closure process and it was presented and accepted by motorized recreationists on that basis. In

fact, the rule specifically allows new motorized routes. The rule did not authorize or direct a massive motorized closure process. However, in actual implementation, the travel management rule is being used as a massive motorized closure tool contrary to the wording of the rule and the presentation of the rule to the public during the rule making process. Implementation of the rule has included very few new routes. Proper implementation of the travel management rule is a significant issue. We request that this evaluation carefully consider the intent of the Final OHV Rule and use it to designate existing motorized routes and create new motorized routes. We also request that this action monitor the process for any misuse of the rule.

39. The Purpose and Need for this action is to implement the Final OHV Rule. The Final OHV Rule was written to designate existing motorized routes for appropriate uses and create new motorized routes where needed. Implementation of the Final OHV Rule should not result in a massive motorized closure. The Purpose and Need for this project must follow through on the Final OHV Rule as a route designation process as it was presented to motorized recreationists during the rulemaking.
40. Our observations in the project area confirm that most visitors are out to enjoy motorized access and motorized. The Purpose and Need does not adequately address and recognize the current highly popular level of motorized access and recreation and the need for increased motorized opportunities. Therefore, the current Purpose and Need is destined to produce a decision that does not meet the needs of the public and will not be willingly accepted by the public. To avoid this disconnect, we request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. This approach will avoid the creation of a significant issue with the process and a serious procedural deficiency in the Purpose and Need.
41. In an article on road de-commissioning (<http://www.greatfallsribune.com/article/20110824/NEWS01/108240302/National-road-trail-reme>), a Forest Service fisheries technician stated that “Fish and aquatic life are adapted to natural influxes of sediment in the spring, but too much material fills spaces in the rocks where the fish lay eggs or covers the eggs.” In order to establish this sort of impact and associate it with OHV recreation, the Forest Service must have site-specific data on natural sediment loads in a stream and site-specific data on the gradation of the sediment from trail erosion and where it ends up. Fine-grained material may wash through the system and cause virtually no impact to fish spawning beds. Any purported impact by OHV recreation without site-specific data and analysis that connects the relatively minor amounts of sediment produced by OHV recreation on critical fish habitat is pure conjecture. Motorized recreationists have been paying a significant price in the form of lost opportunities due to the lack of site-specific data and conjectures. We request that any conjectures about potential impacts be carefully evaluated and only allowed in the analysis when confirmed by actual site-specific proofs and data.
42. Additionally, an adequate sense of magnitude must be employed within the analysis and decision-making. For example, the total naturally occurring loss of soil from the Cibola National Forest is estimated to be on the order of 1,577 acre-feet per year (1,892,000 acres total forest area times a depth of 0.008 feet of soil loss per year). The loss associated with OHV use is on the order of 52 acre-feet (5,200 acres of roads and trails times a depth of 0.01 feet of soil loss

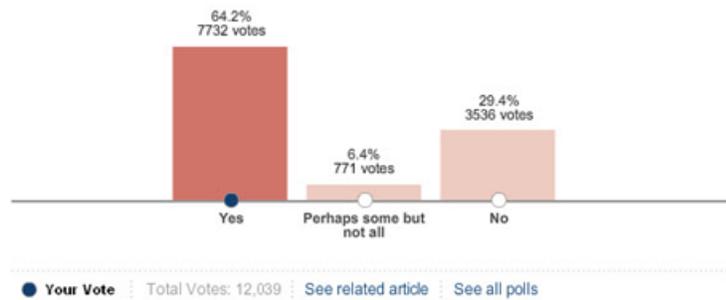
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per year). Therefore, the soil erosion associated with OHV recreation is relatively insignificant compared to the naturally occurring erosion rate and acceptable for multiple-use lands. Moreover, there are many mitigation measures that can be employed to reduce soil erosion on roads and trails while still allowing the public to enjoy them. Other examples that should be part of the evaluation include the naturally occurring mortality rate of fish and game compared to the mortality rate associated with OHV recreation. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of OHV impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of the comparison of impacts to naturally occurring levels combined with the lack of site-specific data would be a procedural deficiency that could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude.

43. Past travel plans have suffered from “confirmation bias. Confirmation bias is a tendency to favor information that confirms an individual’s or group think preconceptions or hypotheses regardless of whether the information is true (http://en.wikipedia.org/wiki/Confirmation_bias). In past travel plans only studies with negative motorized conclusions have been cited. We request that the evaluation include a broad screening of issues, information, data, opinions, and needs so that it is not based on confirmation bias and meets NEPA procedural requirements. One important component required to avoid confirmation bias is the inclusion of OHV and other motorized recreationists on the inter-disciplinary team.
44. We are very concerned about what is considered natural and what is not considered natural. First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation. Secondly, massive impacts from natural events such as fires, floods, and pine beetle (we have witnessed all of them recently) are considered acceptable while relatively miniscule impacts from motorized recreation are considered unacceptable. This sort of reasoning is clearly arbitrary and capricious and we ask that the evaluation define the natural level of impacts, develop a sense of magnitude for those impacts versus motorized impacts and carefully screen out any hint of arbitrary and capricious decision-making. In order to avoid being arbitrary and capricious, all impacts must be compared to natural levels. Impacts associated with OHV recreation should not be considered significant unless they are 50% or more of the natural level.
45. 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.
46. A recent poll in the Wall Street Journal demonstrates the overwhelming support for multiple-use of our public lands.

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Should 40 million acres of land be removed from federal protection and opened to mining, logging and other uses?



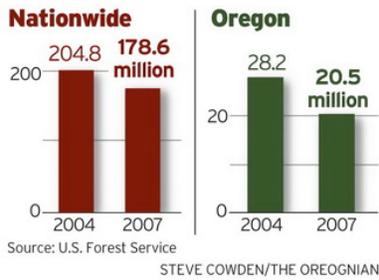
<http://online.wsj.com/community/groups/question-day-229/topics/should-40-million-acres-land>

47. 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.
48. The positive economic benefit of OHV recreation in Montana is significant as documented by Montana Fish Wildlife and Parks in their report Montana Off-Highway Vehicles 2008 published in January 2009 (www.bber.umt.edu/pubs/survey/MT_OHV_2008.pdf). This report was prepared by James T. Sylvester, Bureau of Business and Economic Research, The University of Montana-Missoula and found that total OHV recreation expenditures by Montana residents was \$122,900,000 in 2008. There is also a significant out-of-state expenditure that was not evaluated by this investigation. This is an especially significant issue during these tough economic times. OHV recreation based on a network of trails that attracts visitors to the area will produce a significant positive economic impact that must be given a hard look during the development of alternatives and the evaluation.
49. The number one concern of OHV recreationists as documented by Montana Fish Wildlife and Parks in their report Montana Off-Highway Vehicles 2008 is "Access to trails".
50. OHV recreationists have a strong interest in long distance routes where they can pack their camping gear with them and travel 90 to 125 miles. The concept is to camp along the way similar to the Magruder trail in Idaho (<http://fs.usda.gov/nezperce>) and cover 90 to 125 miles as part of the experience. This opportunity could be developed by creating boundary trails around areas such as the Elkhorn WMA, Big Snowys and Pioneer Mountains and using connecting trails through the interior to create figure 8 opportunities. We request that this type of opportunity be evaluated as part of the planning process and that motorized recreationists be involved.

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51. Most residents of Montana are 1st, 2nd, 3rd, or 4th generation Montanans who have been raised with motorized access to their public lands. They have driven their jeeps and motorcycles to places like the Lacy Creek and Tahepia Lake for decades and now many of them enjoy recreating on ATVs. This is a very important cultural issue that must be adequately considered by a travel management plan.
52. Another significant issue that goes along with historic motorized access is associated with the way that the level of involvement in a NEPA process is used to justify motorized closures. Grandpa did not have to participate in a confusing and intimidating NEPA process and NEPA as currently practiced is not reaching most Montanans. Please do not interpret a lesser level of participation as acceptance of motorized closures and use it as a reason to support grant and foundation funded, non-profit non-motorized environmental groups with paid staff. The level of participation is due to the lack of an adequate public involvement program that reaches or involves the majority of residents including motorized recreationists. The project team must be interdisciplinary and include a sufficient number of motorized recreationists that are capable of relating to and understanding the needs of motorized recreationists. At the same time, the NEPA process should seek communication with motorized recreationists equal to that afforded non-motorized environmental groups. We request that the agency carefully assess this situation and implement a NEPA public involvement program that adequately compensates for these conditions and adequately identifies the significant issues and needs of motorized recreationists.
53. There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. We request that this important need be adequately addressed in the preferred alternative.
54. The current trend of excessive motorized access and motorized recreational closures is having a significant impact on the number of visitors to the forest as shown in the recently released NVUM report (http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf, <http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt>) and the following graphic based on that data. This trend has created a significant issues in regards to adequate public access and adequate motorized recreation which much be analyzed adequately during the process.

Visits to national forests have fallen off nationwide and sharply in Oregon.



Forest Service Region	National Forest Visits 2004 (000s)	National Forest Visits 2007 (000s)	Change in Visitation (000s)	% Change
01 Montana, Northern Idaho, Northeast Washington, North Dakota	13,200	11,265	-1,935	-15%
02 Colorado, Kansas, Nebraska, South Dakota, Wyoming	32,500	31,025	-1,475	-5%
03 Arizona, New Mexico	20,500	20,502	2	0%
04 Nevada, Utah, Southern Idaho	23,300	21,315	-1,985	-9%
05 California	30,700	28,702	-1,998	-7%
06 Oregon, Washington	28,200	20,495	-7,705	-27%
08 Southeastern US, Puerto Rico	31,000	25,867	-5,133	-17%
09 Northeastern US	22,500	17,033	-5,467	-24%
10 Alaska	2,900	2,421	-479	-17%
TOTAL	204,800	178,625	-26,175	-13%

55. A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized use, designates which vehicles will be allowed on which routes and if seasonal restrictions apply. A comprehensive trail designation plans does the same thing except it includes all trail uses, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a "comprehensive" travel plan by using only the existing inventory of motorized routes. They do this by identifying existing motorized trails that are good for mountain bikes, equestrians and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn't mean the agency can't take into consideration the effect each alternative will have on non-motorized visitors. It can - and it should be part of the NEPA analysis. But that is totally different from specifically providing a non-motorized trail system via the existing inventory of motorized routes. We support the creation, designation and management of non-motorized trails, but not at the expense of motorized visitors. We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.
56. An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, and four-wheel drive vehicles. Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick that the team should measure travel plan alternatives by.
57. Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails has far less impact than roads in all resource areas and motorcycle single-track trails have far less impact than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decision-making.
58. 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

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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. 3. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.

59. Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities with this action. This can be accomplished by implementing a route designation for all existing routes.

60. A starting list of actions that should be evaluated in a cumulative effect analysis include:

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
Subtotal	50,494,925	39,413.3	28,343.3	11,068.7	28.08%	No		
Other Significant Measures of Closed Motorized Opportunities								
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	
Notes:								
* 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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61. Past actions that have had a significant impact on motorized recreationists in Montana as shown in the table above. Reasonably foreseeable actions including travel plans, forest plans and resource management plans will produce additional significant impacts. These actions have produced or will produce a significant debt in the mitigation bank for motorized recreational opportunities in the Beaverhead-Deerlodge National Forest and immediate surrounding areas and this issue must be adequately addressed.
62. Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important.
63. All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.
64. The needs of the public for motorized recreational opportunities include a variety of trails for different skill levels. Also, routes with minimal traffic are needed as practice routes for beginning riders.
65. 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. Sharing should be a primary goal for use of these lands. 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. Additionally, single-track challenge trails are needed for expert riders and trials type motorcycles.
66. The loss of high quality motorized routes in the Beaverhead-Deerlodge National Forest 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 proposal to close existing motorcycle single-track trail 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.
67. National Forests in Idaho have a long and successful history of sharing single-track trails with motorcycles and we request that this strategy be used in the project area. . Details on the trail system in Idaho are shown by zooming in on the map at <http://www.trails.idaho.gov/>.
68. Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. The process has not differentiated between ATV

and motorcycle trails in the travel plan alternatives. In order to recognize the different needs and impacts, the evaluation must be differentiated between ATV and motorcycle trails. Figure 2.2 and 2.7 on page 14 of Chapter 2 in the 3-State OHV EIS and Decision clearly shows that existing tracks used by motorcycles are to be considered as motorized trails (<http://www.mt.blm.gov/ea/ohv/Chapter2.pdf>). The evaluation must consider these routes in order to meet the requirements of the 3-State OHV agreement.

69. Over 90% of the visitors to the project area are associated with multiple-use opportunities including motorized access and motorized recreation opportunities. These are multiple-use lands as designated by congress and must be managed as such. Recreation is a stated purpose for multiple-use lands.
70. Wilderness is closed to motorized vehicles and equipment. Therefore, multiple-use lands should be open to motorized vehicles and equipment. Wilderness criteria and standards should not be applied to multiple-use lands.
71. The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.
72. Site specific monitoring of motorized versus non-motorized use must be provided for each route as required by the National OHV Rule.
73. Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.
74. Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles.
75. 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.
76. We have been keeping observations of the types of visitors in multiple-use areas since 1999 and have found that 97% of the visitors are motorized recreationists. 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.

77. The travel management plan for the area must reflect that use and the needs of the public for motorized recreational opportunities in the area. Again, these are multiple-use lands and we ask that they remain viable multiple-use lands by not closing existing motorized routes.
78. Theoretical or assumed impacts must not be used to close motorized recreational opportunities. This is happening way too often. For example, an impact on wildlife by OHV recreation is assumed on a theoretical basis but there is no site specific data or monitoring to back that statement. A similar situation is happening in other resource areas including sedimentation and noxious weeds. Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. In order to avoid arbitrary and capricious decisions, site specific data and monitoring must be presented and demonstrate a measure significant impact.
79. A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes normal runoff, floods, and fires. The recent fires in the Beaverhead-Deerlodge National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years. Another example is the assertion that groomed snowmobile trails affect the lynx. Groomed snowmobile trails cover less than 0.001% of the total area and the impact on the lynx is of a similar magnitude. Additionally, if snowmobile trails affect the lynx, then so do cross-country and snowshoe ski trails. Again, we doubt that these impact the lynx but if snowmobiles do, then so do trails packed by non-motorized uses. Quite often non-motorized impacts are equal or greater and they must be fairly assessed also.
80. Confirmation of the significant magnitude of the impacts of fire versus the relatively minor impacts of recreation are further substantiated by the following article from the Helena IR: *The popular Meriwether picnic area, located along the Missouri River in the Gates of the Mountains corridor, also will be closed until the area is deemed safe for public use. Following the 2007 Meriwether Fire, debris and numerous floods continue to flow through the picnic site, creating a serious safety hazard. The public docks will not be installed this year; instead, people should use Coulter campground. The Meriwether Picnic Area closure could remain in effect for several years, until hydrologic conditions improve in Meriwether Canyon. "Flash floods, as those happening at this site, occur when the ground becomes saturated with water that cannot be absorbed quickly enough," said Mike Cole, acting Helena District ranger. "Without live vegetation to absorb the precipitation up on the mountain, the water runs off and floods the picnic area."* http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1
81. With respect to the position that there is not enough money to mitigate problems, motorized recreationists can work with the Forest Service as partners to obtain many different grants.
82. Also, motorized recreationists generate significant levels of funding that would be available if the agency would pursue them and the system was working to distribute them equitably. The magnitude of gas tax paid by OHV recreationists is significant. Fuel used for off-road motorcycle, atv and 4-wheel drive recreation in Montana is estimated at 18,537,060 gallons per

year (Report ORNL/TM-1999/100, Federal Highway Administration http://www-cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf). Federal gas tax paid by OHV recreationists living in Montana is significant and is estimated at \$3,410,819 (\$0.184 tax per gallon times 18,537,060 gallons per year). The present worth of this annual amount over the past 30 years is about \$58,973,000.

The State of Montana fuel tax is \$0.2775 per gallon (<http://www.mdt.state.mt.us/administration/gastaxrefund.html>). Therefore, an estimated \$5,144,034 in state fuel tax (\$0.2775 per gallon times 18,537,060 gallons per year) is paid annually by Montana off-road recreationists. The present worth of this annual amount over the past 30 years is about \$88,940,000.

The amount of gas tax being returned to Montana OHV recreationists through State Trails Program (STP) and Recreational Trails Programs (RTP) is less than \$200,000 per year (<http://www.fwp.state.mt.us/parks/trails/trailgrantapps.asp> and <http://www.fwp.state.mt.us/parks/ohvgrantaward.asp>) or less 3% of the total annual gas tax paid by OHV recreationists. Basically OHV recreationists generate a significant amount OHV gas tax but it is not being returned for use in OHV trail projects. These monies should be used to maintain, develop, and provide environmental enhancement of OHV recreational resources but, unfortunately, it is being diverted elsewhere. This significant issue must be addressed.

83. The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. OHV trail maintenance and gas tax monies are available to fund this maintenance. Each region could set up a program similar to the Trails Unlimited program (<http://www.fs.fed.us/trailsunlimited/>). AmeriCorps type labor could also be used. The SWECO could not be used on motorcycle single-track trails but they typically require less maintenance and water bars/dips/mounds can usually be constructed on these trails by hand work.
84. Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.
85. 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 .
86. The Beaverhead-Deerlodge National Forest has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to “explore” closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience.
87. The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any

new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement. Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists. We are concerned that the process will not provide motorized recreationists with an equal opportunity (50/50 sharing of motorized to non-motorized trails) in the outcome and we are only destined to lose. We would appreciate an independent evaluation of this situation as soon as possible so that the proper scoping direction can be corrected early in the process.

88. Note that non-motorized recreationists can use routes that are both open and closed to motorized recreationists including roads and the evaluation of the opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can use an infinite amount of cross-country opportunity and motorized recreationists can not. A reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources.
89. 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) specifically stated "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. This commitment was recently upheld as part of appeal Number 07-05-10-0005 dated January 10, 2008 for the Smith River NRA travel management plan in the Six Rivers National Forest filed by Blue Ribbon Coalition (<http://www.sharetrails.org/releases/media/?story=556> and www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf). 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.
90. Jim Angell, the Denver-based Earth Justice attorney, says that's why it's too simplistic to liken roadless protections to those of full-blown wilderness designations - which take an act of Congress. "And it didn't bar things like oil and gas, which often takes place without the building of roads by angling the drilling from elsewhere; it didn't apply to ORV use which can continue without any stop," Angell says.
<http://www.publicbroadcasting.net/kunc/news.newsmain/article/1/0/1622248/Regional/Oral.Arguments.Heard.in.Roadless.Appeal>
91. The evaluation and decision-making must take into account that the total area of the National Forest equals 192,300,000 acres and out of that total 44,919,000 acres or 23.36% is already designated wilderness. Current forest planning actions seek to convert roadless lands to defacto wilderness even though they are designated multiple-use lands. Therefore, this percentage will

be even more lopsided toward non-motorized opportunities at 53.79% assuming that 58,518 acres of roadless areas are converted to defacto wilderness areas and managed for non-motorized recreation. We maintain that the management of all of the remaining 147,381,000 congressionally designated multiple-use acres (including roadless) or 76.64% of the forest should be managed for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 96.41% of the public who visit our National Forests for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, does not provide a proper allocation of multiple-use recreation opportunities and does not meet the laws requiring multiple-use management of these lands.

92. 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 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
Totals			3,380,039			4,430	4,057	2,762	907	293	0
						Miles of Open Road per Square Mile =		0.92			
						Total Roads and Trails Open to Non-Motorized Use, Miles		7,192			
						Non-Motorized Trails, Miles =		1,855			
						Non-Motorized Trails, % =		67.16%			
						Motorized Trails, miles =		907		293	
						Motorized Trails, % =		32.84%			
						Trails Open to Motorcycles %				10.61%	
http://www.fs.fed.us/recreation/programs/ohv/ http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf Totals Revised per Forest Plan -100 miles of road, -200 miles of trails											

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

93. 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.

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

95. 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 proposed must adequately address this imbalance and it would be a step in the wrong direction to create an even greater imbalance.

96. 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 motor trail opportunities (___ miles and ___% non-motorized trails versus ___ miles and ___% motorized trails). 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

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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.

97. The following are examples of adequate OHV trail systems that should be used to guide development of this project. The alternatives for this project should be compared to these OHV trail systems. Also, it would help the project team understand the needs of OHV recreationists by visiting these areas and experiencing them on an OHV. Examples of the types of systems that should be developed in the project area include:

- a. Danskin Mountain in the Boise National Forest (<http://www.stayontrails.com/assets/content/maps/Danskin-Mountains-map.pdf>)
- b. South Fork Boise River in the Boise and Sawtooth National Forests
- c. Winom-Frazier in the Umatilla/Whitman National Forest
- d. Prospect OHV area in the Rogue River National Forest
- e. Paiute OHV System in the Fishlake National Forest
- f. East Fork Rock (<http://www.fs.fed.us/r6/centraloregon/recreation/cohvops/efrindex.shtml>),
- g. Mendocino National Forest (<http://www.fs.fed.us/r5/mendocino/recreation/ohv/>), and
- h. High Lakes and Blue Lake Trail System in the Gifford Pinchot National Forest (<http://www.fs.fed.us/gpnf/recreation/trailbikes/documents/trails5269small.pdf>).
- i. Canfield Trail System near Coeur d'Alene, Idaho Panhandle National Forest, <http://www.stayontrails.com/assets/content/maps/Canfield-Butte-trail-map.pdf>
- j. In order to meet the public's need for motorized recreational opportunities, the project area and every national forest and BLM district must have OHV systems comparable to these examples.

98. Under the existing conditions with a typical width of no more than 12 feet, the 4057 miles of roads in the Beaverhead-Deerlodge National Forest would cover about 5901 acres (4057 x 5280 x 12 / 43560). At a typical width of no more than 48 inches, the 614 miles of ATV trails cover about 298 acres. At a typical width of no more than 24 inches the 293 miles of motorized single-track trails cover 71 acres. The total Beaverhead-Deerlodge National Forest is covers 3,364,000 acres. The percentage of the total forest used by roads, ATV trails, and single-track motorcycle trails under existing conditions is respectively, 0.1754%, 0.0088%, and 0.0021%. Additionally, the existing road density is 0.772 mile per square mile which is far less than the 1 mile per square mile criteria.

The total area of roads and trails under Existing Conditions far less than 1% of the project area. The total area used by motorized routes under Existing Conditions is 6270 acres or 0.1864% of the 3,364,000 acre area. Therefore, the area used Under Existing Conditions is relatively insignificant and is an entirely reasonable level of use on multiple-use lands. The reduction under the proposed action produces a significant impact on the public's ability to access and recreate and is not a reasonable level of use for lands designated for multiple-use by congress. Furthermore, a Pro-Recreation Alternative that increases motorized access and motorized recreational opportunities in the Beaverhead Deerlodge National Forest is an entirely reasonable alternative for these multiple-use lands.

Acres and % of Forest for Existing Motorized Routes					
Total Project Area (acres) =			3,364,000		
	Miles	Feet width	Acres	% of Forest	Road Density mi/sq mi
Miles of road	4,057.0	12	5901.09	0.1754%	0.772
Miles of ATV	614.0	4	297.70	0.0088%	
Miles of Motorcycle	293.0	2	71.03	0.0021%	
		Total	6269.82	0.1864%	

99. In a recent article

(http://www.helenair.com/articles/2008/08/01/national/80na_080801_drill.prt) about a lawsuit regarding drilling in New Mexico on the Otera Mesa, the BLM manager stated “While up to 90 percent of BLM lands are open to drilling under the plan, Childress said only 800 to 900 acres of Otero Mesa’s 1.2 million would be permanently disturbed by roads, footpads and other drilling related activities. “I think that’s a pretty reasonable percentage,” he said.” We agree and find that this is a relatively insignificant percentage of the total area and quite acceptable management for multiple-use lands.

100. National OHV criteria and standards are not entirely applicable to conditions in the Beaverhead-Deerlodge National Forest project area and Montana, i.e. one size does not fit all. The analysis needs to allow for judgment on site specific conditions so that the decision is a better match for local conditions and customs which center on motorized access and motorized recreation.

101. The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles.

102. Specific references from the new National OHV Policy that must be adequately addressed include:

Existing – The unit or district restricts motor vehicles to “existing” routes, including user-created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use.

For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management.

To create a comprehensive system of travel management, the final rule consolidates regulations governing motor vehicle use in one part, 212, entitled “Travel Management.” Motor vehicles remain a legitimate recreational use of NFS lands.

This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule will prohibit the use of motor vehicles off the designated system, as well

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as use of motor vehicles on routes and in areas that is not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on National Forest System lands; address needs for access to National Forest System lands; and preserve areas of opportunity on each National Forest for nonmotorized travel and experiences.

Clearly the rule intended to identify existing routes being used for motorized access and recreation and preserve existing non-motorized routes by elimination of cross-country travel. Why is a process that was intended to eliminate cross-country travel and designate existing motorized routes been allowed to turn into a massive closure process?

Additionally, the rule preserves existing non-motorized routes by not allowing them to be converted to motorized routes and it does not state anywhere that non-motorized travel and experiences were to be significantly enhanced by a wholesale conversion of motorized routes to non-motorized routes. We request that the intention of the final OHV Route Designation rule be followed by the Beaverhead Deerlodge Forest Plan and that the rule not be used inappropriately as an action to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes.

103. In order to be responsive to the needs of motorized recreationists, the plan should specifically allow for amendments as required to create new trails, connect trails to create motorized loops, extend trails, make minor boundary adjustments to allow a motorized trail, etc.
104. Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to inter-connect to OHV routes. Dual-use is essential for the family OHV experience. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing. Without the dual-use designation, the proposed action would transform family OHV trips from a healthy family oriented recreation to an illegal activity. This is not a reasonable nor acceptable outcome.
105. The continual closure of motorized trails has forced OHVs to be operated on forest roads in order to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures and then combined with the lack of a reasonable system of roads and trails with dual-use designation have not been adequately considered in past evaluations and decision-making. We request that all reasonable routes be

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designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past.

106. In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trail systems, then the need to create illegal trails would be greatly diminished. Therefore, the catch-22 of the closure trend is that in the end it feeds the illegal activity. In other words, it would be a more advantageous and equitable situation to pro-actively manage motorized recreation.
107. The Forest Service has only addressed less motorized access and less motorized recreational opportunities. The alternatives formulation and decision-making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities.
108. The existing level of motorized access and recreation cannot be dismissed because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.
109. The Ravalli County Off-Road Users Association has found that “at the end of 2006, there were approximately 2500 “stickered” OHV’s in Ravalli County. For the past five years, the growth rate of “stickered” OHV’s has been about 20% per year. If this growth rate continues, the number of OHV’s in the forest will double every four years. On the Bitterroot National Forest there have been no new OHV “system” routes designated for OHV travel since 1996. History, experience and common sense tell us that when adequate, responsible, sustainable routes with attractive destinations are provided, OHV enthusiasts will ride responsibly. On the Bitterroot National Forest this means more routes, not more restriction.” The same analysis must be done for the Beaverhead-Deerlodge National Forest and it will find the same no growth trend and a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth.
110. It is not environmentally and socially responsible to squeeze motorized recreationists into the small possible numbers of areas and routes, yet this is the goal being pursued by the Beaverhead-Deerlodge National Forest. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be adequately addressed.
111. Motorized recreationists endorsed and accepted millions of acres of area restriction under the Off-Highway Vehicle Environmental Impact Statement and Proposed Plan Amendment for Montana, North Dakota and South Dakota (3-State OHV) decision (<http://www.mt.blm.gov/ea/ohv/FSROD.pdf>) and the Travel Management; Designated Routes and Areas for Motor Vehicle Use, Final Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>) as a positive action to control environmental impacts. We accepted area restriction and not area closure. Area closure is

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permanent. Area restriction allows flexibility as needed to address site specific conditions. Each motorized road and trail exists because it serves some multiple-use need. Every road and trail is important to some individual for some purpose. Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value. Motorized recreationists gave up 97% of the area historically available to them under both the 3-State ROD and the National Route Designation rule as the ultimate act of mitigation so that we would continue to have use of existing motorized routes that cover or provide access to an area estimated at less than 3% of the total area. Now motorized recreationists have been given almost no credit for our cooperation during that action and we have only been penalized for our past cooperation by current route designations, resource management plans, forest plans and travel plans that seek to close 50% to 75% of the existing motorized routes. This outcome was not part of the 3-State OHV and National Route Designation agreement and this level of closure is not acceptable to us for that reason. The 3-State OHV and National Route Designation agreements were not made with the intention of massive closures beyond that agreement. We ask that all BLM and Forest Service actions include proper recognition of the agreement behind the 3-State OHV and National Route Designation decisions which allow continued use of the existing networks of motorized roads and trails without massive motorized closures.

112. 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). 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.

The agency 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.

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.

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 from 36 million to 49.6 million or 38% 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).

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. Additionally, NSRE is 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.

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) determined that of the total U.S. population in the West 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. Based on this estimate, it is our opinion that about 60% (29.1% x 2) of the actual visitors to Montana national forests participate in OHV recreation.

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 and dual-sport registrations in Montana grew by at least 24% from 2004 to 2005 (<http://www.snowtana.com/News/Stories/OHVregister.html> and FWP licensing data).

113. 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) 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 recreationists in Montana is $935,670 \times 0.291 = 272,280$.

114. 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) determined that out of the total population in Montana 29.1% or 272,280 individuals participated in OHV recreation. These numbers demonstrate the immense popularity of OHV recreation. These numbers demonstrate that there are not enough existing motorized recreational opportunities. These numbers demonstrate that the agency's motorized closure trend is contrary to the needs of the public. The magnitude of the number of motorized recreationists is real. The misrepresentation of visitor numbers must be discontinued. Proper emphasis must be given to motorized recreation. Additionally, the agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law, the NEPA process should be driven by issues and needs and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service as a public agency will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests including individuals and families are largely ignored. The agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 272,280 motorized and OHV recreationists. The current proposal does not meet these needs in a multiple-use area that is ideal for motorized use.

115. A clear imbalance between motorized and non-motorized recreational trail opportunities exists in Montana. Clear evidence of this can be found by comparing motorized trail opportunities in Idaho versus those in Montana. As of FY2006, thirteen national forests in Idaho have approximately 9,199 miles of motorized trail, 6,868 miles of motorized single-track trail, and 14,576 miles of non-motorized trail as shown in http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf . In the same table nine national forests in Montana have about 5,068 miles of motorized trail, 3,072 miles of motorized single-track trail and 10,136 miles of non-motorized trail. Details on the trail system in Idaho are shown by zooming in on the map at <http://www.trails.idaho.gov/>. The values for Montana have been significantly reduced by a number of decisions and ongoing actions including those in the Gallatin, Flathead, Lewis and Clark, Bitterroot, and Helena National Forests and other actions listed in Table 2. Current motorized statistics are estimated to be less than 4,500 miles of motorized trail and 2,500 miles of motorized single-track trail. The Forest Service needs to update their tables to reflect current miles. Therefore, motorized trails in Montana area approximately $1/2$ ($4500/9,199$) of the motorized opportunity found in Idaho. At the same time the number of OHV users in Idaho and Montana are comparable in magnitude at respectively; 320,800 and 201,100 or about $2/3$ ($201,100/320,800$) of the number in Idaho. Using a ratio comparable to Idaho, Montana should have at least 6,071 ($2/3 \times 9,199$) miles of motorized trail and 4,500 miles of motorized single-track trail. Therefore, Montana has a

shortfall of respectively; 1,500 miles of motorized trail (6,071 – 4,500) and 2,000 miles of motorized single-track trail (2,500 – 4,500).

116. The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. Designation as wilderness is further out of touch with the needs of the public because recreation is not a stated purpose of the wilderness act and, therefore, recreation in wilderness area can not and should not be emphasized. Note that we could oppose any recreation development in wilderness areas in retaliation to non-motorized groups that go after our recreation opportunities but we have chosen not to do so. Recreation is a stated purpose in the multiple-use laws and, therefore, should be emphasized in the purpose and action.
117. If Roadless acres are included in this total, it becomes even more unbalanced with a total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors.
118. The evaluation must adequately consider and address the fact that motorized access to the national forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. 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 to non-motorized recreationists. The total route opportunity available to non-motorized recreationists is 510,575 miles, the total miles of exclusive non-motorized trails are 93,088 or 75% of the existing total. The miles of non-motorized cross-country opportunity are infinite.
119. The total miles of roads open to motorized recreationists are 286,445 and the total miles of trails open to motorized recreationists are 31,853 or 25% of the existing total. The cross-country miles are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in the national forest system is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.

Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system.

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
			Totals			385,634	286,445	124,941	31,853	15,526	65,887,245
						Miles of Open Road per Square Mile =	0.74				
						Total Roads and Trails Open to Non-Motorized Use, Miles	510,575				
						Non-Motorized Trails, Miles =	93,088				
						Non-Motorized Trails, % =	74.51%				
						Motorized Trails, miles =	31,853		15,526		
						Motorized Trails, % =	25.49%				
						Trails Open to Motorcycles %			12.43%		
						http://www.fs.fed.us/recreation/programs/ohw/					
						http://www.fs.fed.us/recreation/programs/ohw/travel_mgmt_schedule.pdf					

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

120. The evaluation must adequately consider and address the fact that motorized access to the national forest in Region 1 is relatively limited as shown by the miles of roads versus the number of acres in the following table. 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 to non-motorized recreationists. The total route opportunity available to non-motorized recreationists in Region 1 is 73,348 miles; the total miles of exclusive non-motorized trails are 14,521 or 66% of the total existing miles of trail. The miles of cross-country opportunity are infinite.

The total miles of roads open to motorized recreationists are 26,259 and the total miles of trails open to motorized recreationists are 7,521 or 34% of the total existing miles of trail. The miles of cross-country opportunity are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in Region 1 is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.

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
			Totals			51,306	26,259	22,042	7,521	5,052	4,352,849
						Miles of Open Road per Square Mile =	0.51				
						Total Roads and Trails Open to Non-Motorized Use, Miles	73,348				
						Non-Motorized Trails, Miles =	14,521				
						Non-Motorized Trails, % =	65.88%				
						Motorized Trails, miles =	7,521		5,052		
						Motorized Trails, % =	34.12%				
						Trails Open to Motorcycles %			22.92%		
						http://www.fs.fed.us/recreation/programs/ohw/					
						http://www.fs.fed.us/recreation/programs/ohw/travel_mgmt_schedule.pdf					

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

121. Additionally, specific NVUM data for Montana National Forests shows that there were 10,055,000 total site visits to the forest and only 304,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore, wilderness visits in Montana are only 3.02% of the total visits yet past decisions have produced both a

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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 96.98% of the visitors are for the most part associated with multiple-uses. 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 regardless of whether they provide comments in a cumbersome NEPA process.

Table of Wilderness Visits to Montana National Forests versus Multiple-Use Visits

Forest	All Site Visits (000's)	Wilderness Visits (000's)	Wilderness Visits (%)	Multiple-Use Visits (%)
Beaverhead-Deerlodge	1,377	15	1.09%	98.91%
Bitterroot	731	122	16.69%	83.31%
Custer	845	12	1.42%	98.58%
Flathead	1,514	24	1.59%	98.41%
Gallatin	1,650	46	2.79%	97.21%
Helena	508	3	0.59%	99.41%
Kootenai	1,400	32	2.29%	97.71%
Lewis & Clark	536	26	4.85%	95.15%
Lolo	1,494	24	1.61%	98.39%
Total	10,055	304	3.02%	96.98%
http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf				

122. Additionally, 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). 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 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 98.91% of the visitors are associated with multiple-uses. 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 regardless of whether they provide comments in a cumbersome NEPA process.

123. The NVUM and Southern Research Station reports cited prove that there are 400,707 (1,377,000 forest visitors x 29.1% OHV) 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.

124. As demonstrated by Table 3, the ratio of acres available to wilderness/non-motorized visitors versus the acres available to multiple-use visitors is way out of balance in the existing condition with 1.83 acres per wilderness visitor and 0.61 acres per multiple-use visitor for a ratio of about 3:1. The proposed action to designate all roadless areas non-motorized areas makes this inequity even worse by providing 4.19 acres per wilderness visitor and 0.52 acre per multiple-use visitor for a ratio of about 8:1.

The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.

Table 3 Acres per Forest Visitor and Ratio

Total Annual Forest Visitors =	2,893,000
Wilderness Visitors =	103,859
Multiple-use Visitors =	2,789,141
Forest Acreage =	1,892,000
Existing Wilderness Acreage =	189,000
Existing Multiple-use Acreage =	1,703,000
Proposed Defacto Wilderness Acreage =	246,000
Total Proposed Defacto Wilderness =	435,000
Total Proposed Multiple-use Acreage =	1,457,000
Existing Acres/Wilderness Visitor =	1.82
Proposed Acres/Wilderness Visitor =	4.19
Percent Increase =	130%
Existing Acres/Multiple-use Visitor =	0.61
Proposed Acres/Multiple-use Visitor =	0.52
Percent Decrease =	-14%
Existing Ratio of Defacto Wilderness to MU Acres per Visitor	2.98
Proposed Ratio of Defacto Wilderness to MU Acres per Visitor	8.02
Note 1: Total Proposed Defacto Wilderness includes all Roadless Areas which the Agency is inappropriately managing as non-motorized.	
Note 2: The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.	

We recognize the desire for a quiet experience in the forest as a legitimate value. To varying degrees, we all visit the forest to enjoy the natural sounds of streams, trees, and wildlife. Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, i.e, wilderness areas. Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area. Given that vast areas of our forests have been set aside for the exclusive benefit of this relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs.

125. 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-

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motorized trails. This inequity is a significant issue that must be adequately addressed. For example, the Forest Service provides hundreds of wilderness rangers to patrol the wilderness, and educate wilderness visitors. Multiple-use Rangers are almost non-existent even though the ratio of multiple-use visitors to wilderness visitors is over 100:1. 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.

126. Based on our estimate that 40% of the visitors are OHV recreationists, we estimate using the NVUM data for total visitors that the total number of OHV visits to the Beaverhead-Deerlodge National Forest is $550,800 = (1,377,000 \times .40)$.

127. 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 Access Vehicles (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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128. 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.
129. 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) 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 travel management plan.
130. Based on Southern Recreation Report estimates that 29.1% of the visitors are OHV recreationists, the total number of OHV related visits to the Beaverhead-Deerlodge National Forest is 400,170 (1,377,000 x .291) (see NVUM citation for total number of forest visitors above). Given the 907 miles of existing motorized trails, there are 442 (400,170 / 907) OHV visitors per mile of motorized trail or 1 OHV visitor every 11.95 feet. Given the 1855 miles of non-motorized trail and 15,000 wilderness visitors, there are 8.09 (15,000 / 1855) non-motorized visitors per mile of trail or 1 non-motorized visitor every 653 feet. This imbalance of opportunity cannot be considered equal program delivery and the proposed action must address this significant issue by creating more motorized trails.

Unfortunately the proposed action worsens the imbalance by decreasing motorized trails to 486 miles and increasing non-motorized trails to 1,249 miles. The proposed action would result in 602 OHV visitors per mile of trail versus 98 non-motorized visitors per mile of trail. Additionally, there would be 8.78 feet of trail per motorized visitor versus 54.06 feet of trail per non-motorized visitor. Clearly the current proposal would be a step in the wrong direction.

131. The Government Accountability Office (GAO) report on OHV recreation has been prepared and released to the general public (<http://www.gao.gov/Products/GAO-09-509>). GAO investigators interviewed agency personnel, OHV rider and industry representatives and environmental group representatives. GAO issued a number of findings in terms of OHV recreation on public lands. GAO highlights include that OHV recreation is growing in popularity and that more Americans are seeking access to federal public lands via their OHVs. Second, the report found that the federal land agencies could do a better job of providing signage and general outreach to the recreating public so that visitors to public lands have a better understanding of where they can and cannot ride their OHVs. The report also focused attention on the inadequacies of law enforcement and the inconsistent scale of fines and penalties for inappropriate behavior on public lands. GAO found that the land agencies were stretched, both in terms of financial resources and personnel, and that other pressing concerns, such as fighting wildfires, apprehending drug criminals and border control issues kept agency personnel from devoting the necessary time to make public lands more accessible to recreation

visitors. GAO looked into the issue of environmental damage caused by OHVs and found such damage is far less than some observers believed to be the case. Another finding was that agency personnel worked well with OHV user groups on trail maintenance projects. The report's conclusions confirm what we have known for a long time about OHV recreation on public lands and provide further reason to continue working on our priority issues. Motorized recreationists will continue to carry on our efforts to support law enforcement reform legislation as well as seek additional funding for better signage, maps and trail maintenance. Working with the Congress and our land agencies, we can create an environment where OHV recreation can continue to grow in popularity as more American families look to explore and enjoy the great outdoors.

132. The Forest Service must give a hard look at the impact of motorized closures on the human environment. Per CEQ guidance, NEPA documents are to be driven by significant issues. Motorized closures and the lack of adequate motorized opportunities have a significant impact on motorized recreationists. The impact of motorized closures on the health of our members and the loss of the benefits of OHV recreation are significant issues to motorized recreationists. In order to make a reasonable decision, the Forest Service must adequately consider the issues and impacts associated with motorized closures on the mental and physical health of the public. These issues are critical due to the cumulative effect of all motorized closures. As one example, consider the motorized closure of the Scratch Gravel Hills near Helena. Members of our group collected over 300 signatures on a petition protesting that closure. Many of the signatures were from high school students. Now there is no place close to Helena that young people can go. What are they doing now? It is not as positive as riding their dirt bike or ATV in the hills. Now multiply that by the thousands of miles of roads and trails that have been closed to the public. The following health issues and benefits of OHV recreation must be addressed in order to arrive at a reasonable decision for this action.

- A. Sadly, one indicator of the condition of the human environment in Montana is the suicide rate. Montana ranks number 2 in the nation (<http://www.suicide.org/suicide-statistics.html>). This significant problem has been specifically identified as requiring special attention by the Department of Health and Human Services <http://www.dphhs.mt.gov/amdd/statesuicideplan.pdf>. Motorized recreation is popular and it is a very healthy and positive human activity that can help address this significant human issue (<http://www.marketwire.com/press-release/The-Results-Are-in-Off-Road-Vehicle-Riding-is-Good-for-Your-Body-and-Soul-1310189.htm>). The Forest Service can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.
- B. Videophilia - the new human tendency to focus on sedentary activities involving electronic media has become a significant social problem in the U.S. (Pergams, O. R. W. and P. A. Zaradic. 2006. Is love of nature in the US becoming love of electronic media? 16-year downtrend in national park visits explained by watching movies, playing video games, internet use, and oil prices. *Journal of Environmental Management* 80:387-393). The study shows that people in the US and other developed nations are spending far less time in nature than ever before. The study tested trends in nature participation in 16 time series in the categories of visitation to various types of public lands in the US, Japan,

and Spain; number of various types of game licenses issued; amount of time spent camping; and amount of time spent backpacking or hiking. The four activities with the greatest per capita participation were visits to Japanese National Parks, US State Parks, US National Parks, and US National Forests, with an average individual participating 0.74-2.75 times per year. All four are in downtrends and are losing between 1% and 3% per year. The longest and most complete time series show that these declines in per capita nature participation typically began between 1981 and 1991, are losing about 1% per year, and have so far lost between 18% and 25%. At the same time, the interest and desire to participate in OHV recreation in the outdoors is increasing and strong as previously documented. OHV recreation is a reasonable alternative to increase participation in outdoor activities and we request that this issue and solution be adequately addressed by this plan by implement more OHV opportunities.

- C. In the past 30 years, the prevalence of overweight and obesity has increased sharply for both adults and children. Between 1976–1980 and 2003–2004, the prevalence of obesity among adults aged 20–74 years increased from 15.0% to 32.9%. This increase is not limited to adults. Among young people, the prevalence of overweight increased from 5.0% to 13.9% for those aged 2–5 years, 6.5% to 18.8% for those aged 6–11 years, and 5.0% to 17.4% for those aged 12–19 years. (Reference: <http://www.cdc.gov/nccdphp/dnpa/obesity/>). This disturbing trend has prompted the President to promote a health and fitness initiative (<http://www.whitehouse.gov/infocus/fitness/toc.html>) and OHV recreation is an activity that meets the physical requirements of the President’s fitness program and counters the epidemic of videophilia.
- D. Research by the Ontario Federation of Trail Riders studied 310 off-road motorcycle enthusiasts and found that the physical exertion was on the order of 60% of VO₂max, or 80% HRmax, or 9.3 METS which is slightly greater than jogging (Characterizing the Physical Demands of Off-Road Motorcycling, Executive Summary, Jamie Burr, Norman Gledhill, Veronica Jamnik, Ontario Federation of Trail Riders, February 2007, http://www.oftr.org/OFTR_Fitness_Study.pdf).
- E. The July 2010 issue of Medicine & Science in Sports & Exercise, the Official Journal of the American College of Sports Medicine (ACSM), “Physiological Demands of Off-Road Vehicle Riding”) focuses specifically on the physiological demands of off-road vehicle (OHV) riding, compares them to the demands of other recreational activities, and explores the health and fitness benefits that OHV participation can provide (<http://www.nohvcc.org/Tools/TopicLibraries/Health.aspx>). The study concluded that the health benefits of OHV recreation include:
- Off-road vehicle riding was found to require “a true physiological demand that would be expected to have a beneficial effect on health and fitness according to Canada’s current physical activity recommendations”.
 - Off-road vehicle riding was determined to be a recreational activity associated with moderate-intensity cardiovascular demand and fatigue-inducing muscular

strength challenges, similar to other self-paced recreational sports such as golf, rock-climbing and alpine skiing.

- Oxygen consumption, which is an indicator of physical work, increased by 3.5 and 6 times the resting values for ATV and ORM riding respectively – which falls within moderate intensity activity according to the American College of Sports Medicine guidelines and is in line with Canadian physical activity recommendations.
- The duration of a typical ride (2-3 hours for ATV, 1-2 hours for ORM) and the frequency of the rides (1-2 times a week) create sufficient opportunity to stimulate changes in aerobic fitness which falls within the physical activity guidelines (American College of Sports Medicine recommends between 450 – 720 MET minutes per week).
- Using heart rate measurements alone, the demands of riding belong to the category of “hard” exercise – this increase of intensity may be linked to heightened psycho emotional responses (i.e. adrenalin), an effect of heat stress while riding, or a response to repeated isometric squeezing of the handlebars.
- When considering muscular force and power involvement, study results indicate a greater impact on muscular endurance as opposed to an increase in strength.
- Off-road vehicle riders perform considerable physical work using their arms and upper body. This upper body strength requirement “could lead to beneficial training increases in musculoskeletal fitness”.
- Study findings also picked up on the psycho-social effects of riding – the “enhanced quality of life and stress reduction effects of off-road riding”.
- Findings also reflect the importance of alternative physical activity such as off-road riding to promote physical activity in a group who might otherwise forego exercise altogether.

We ask that the tremendous value of OHV recreation for both mental and physical health benefits be recognized in the evaluation and used to justify an increase in motorized recreational opportunities.

F. Research by a leading neuroscientist has determined that riding a motorcycle helps keep riders young by invigorating their brains. The brain functions was measured by devices put on the heads of 22 males while riding motorcycles. The researchers found that the riders brains prefrontal areas became highly activated. This is the area of the brain that covers memory, information processing and concentration functions. The research was conducted by Ryuta Kawashima, the scientist behind popular "Brain Training" computer software at Nintendo.

One experiment involved 22 men, all in their 40s and 50s, who held motorcycle licenses, but had not taken a ride for at least a decade. They were randomly split into two groups. The

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first group was asked to resume riding motorcycles in everyday life for two months, the other group was asked to keep driving their cars or trucks. "The group that rode motorbikes posted higher marks in cognitive function tests," Kawashima said.

Another test, required the men to remember a set of numbers in reverse order, "the riders' scores jumped by more than 50 percent in two months, while the non-riders' marks deteriorated slightly," said Kawashima. It should also be noted that the riders in the study mentioned that they made fewer mistakes at work and felt happier.

"Mental care is a very big issue in modern society," says Kawashima. "I think we made an interesting study here as the data shows you can improve your mental condition simply by using motorbikes to commute." The study goes on to display that a motorcycle rider's brain becomes more tense and is in a heightened alertness in order to process information actively during riding. The obvious payoff is that riding a motorcycle helps keep riders young by invigorating their brains.

http://www.dijtokyo.org/events/SMP_DAY1_Kawashima.pdf

<http://motocrossactionmag.com/Main/News/MOTORCYCLES-MAKE-YOU-SMARTER-Japanese-Study-Discov-5756.aspx>

We have observed that the same benefits that Kawashima has documented for motorcyclists also extends to all OHV recreation. We ask that the tremendous value of OHV recreation for both mental and physical health benefits be recognized in the evaluation and used to justify an increase in motorized recreational opportunities.

133. The positive economic impact on the economy of the area is another socio-economic factor that must be adequately considered in the decision-making and especially during this times of economic recession. Arizona State Parks has prepared a good example of an economic analysis of OHV recreation for Coconino County, AZ (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). The economic impacts of OHV recreation in one county are significant with \$258.3 million statewide impact and a \$215.3 million impact locally that supports 2,580 jobs. Off-highway vehicle recreation activity is an immensely powerful part of the Arizona collective economic fabric, generating nearly \$3 billion in retail sales during 2002 (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf).

134. There are 17 references to climate change in the NOI for the forest planning rule (http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5110264.pdf). Climate change is mentioned far more than any other issue. This apparent focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time. There are many in the scientific community that support this position (<http://www.sepp.org/Archive/NewSEPP/LtrtoPaulMartin.html>, http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf, <http://www.climate-science-watch.org>, <http://epw.senate.gov/speechitem.cfm?party=rep&id=263759>). The climate has always been changing. Twelve thousand years ago North America was covered by ice. Before that dinosaurs roamed the area in a humid climate. The planning rule should not create impacts on the human environment because it "presumes" that the climate is changing any more or less

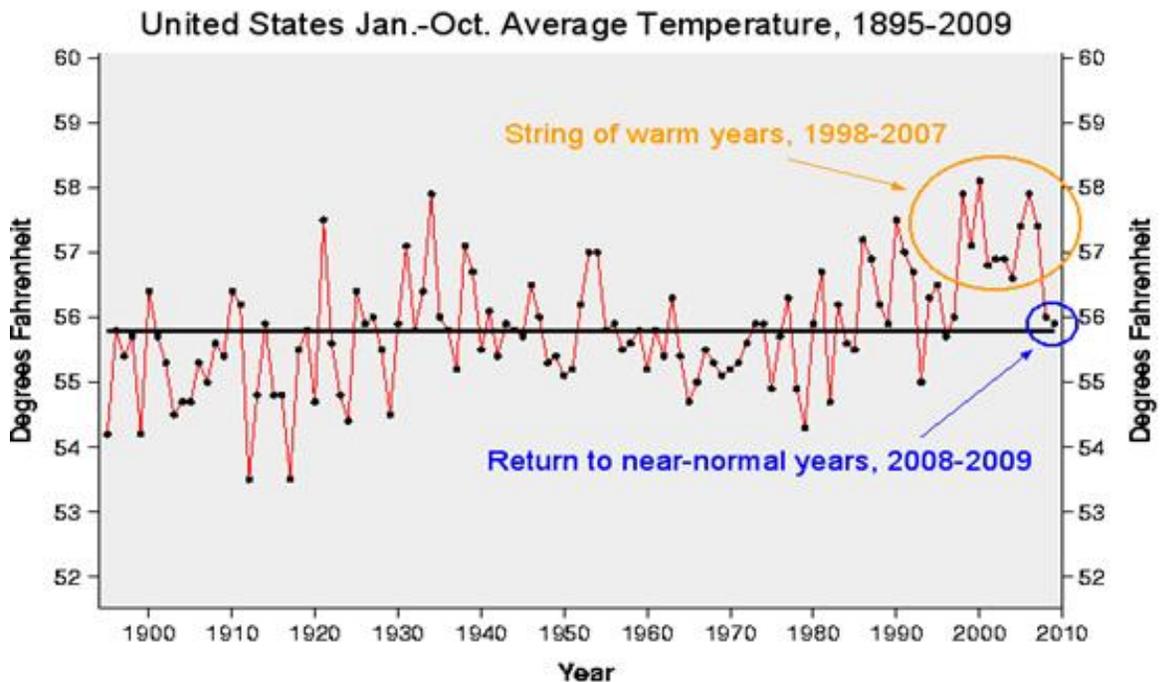
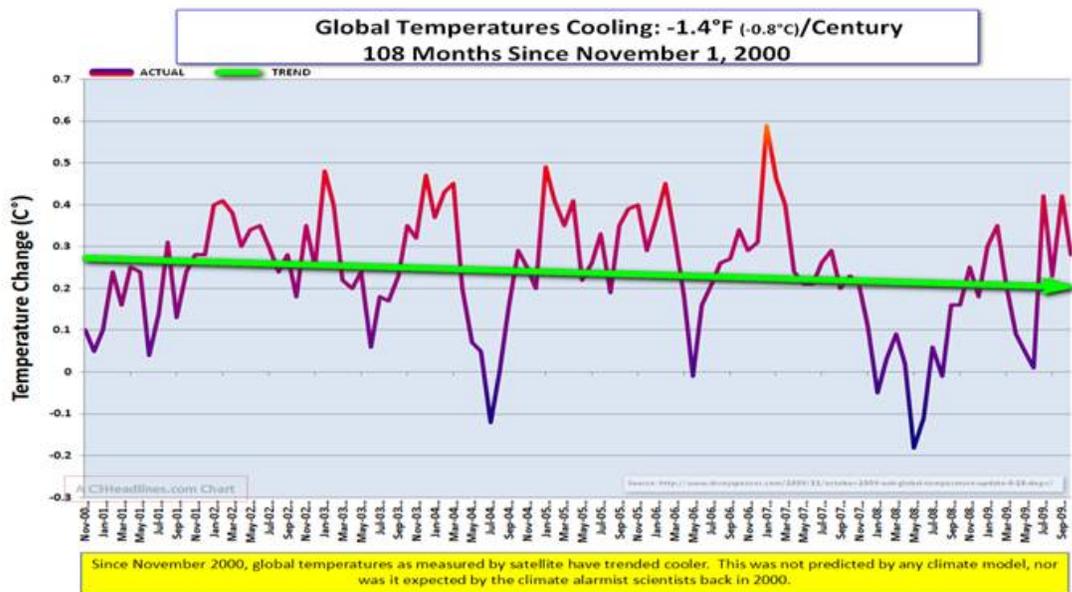
than it always has. The planning rule must be based on extensive long-term credible scientific study. The quality of people’s lives cannot be compromised by a ghost issue without adequate basis. We only get one shot at this life and we want to experience the positive benefits of OHV recreation. Extensive long-term credible scientific conclusions on climate change do not exist at this time and, therefore, it would be unreasonable to make any assumptions about climate change and use those assumptions to impose any impacts on the human environment including motorized recreation in the planning rule.

Additionally,

- Global temperatures are not warming. Since 1998, global temperatures have decreased almost half a degree C.
- The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.
- Manmade CO2 concentrations in the atmosphere are about 19 PPM (5% of 387 PPM overall CO2) which is 1 part in 51,680 total parts – in no way significant. (Hydrogen cyanide gas is one of the most poisonous gases known to man and allowable working conditions for this gas in most of the US are 20 ppm. Carbon dioxide is harmless and actually helpful to plant life and total concentrations of it in the atmosphere by manmade causes are only 19 ppm. Carbon dioxide concentrations at present are near the LOWEST in geologic history. (<http://co2now.org/>)
- There is no statistical correlation between CO2 concentrations in the atmosphere and global temperatures. (Source: <http://www.drroyspencer.com/2010/01/december-2009-uah-global-temperature-update-0-28-degree-c/>)
- Global sea ice has increased by 200,000 square kilometers since 1980. (Arctic Sea Ice – down 900,000 Sq Km, Antarctica Sea Ice – up 1.1 Million Sq Km).

Global Sea Ice:		1980	2009
Southern Hemisphere	Antarctic	4.7	5.8
Northern Hemisphere	Arctic	15	14.1
	Total Global	19.7	19.9

- Polar bear populations are much higher today than they were 30 years ago. (<http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polar-bear-expert-barred-by-global-warmists.html>)
- Over 95 % of the so-called “greenhouse effect” is caused by water vapor (evaporation of the oceans).
- There is no evidence that would purport that motorized recreation has a significant impact on the climate or climate change.



The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.

135. Increasing levels of carbon dioxide have been blamed for a warming trend or climate change. Many studies have found that forest fires are a tremendous source of carbon dioxide. <http://www.sciencedaily.com/releases/2007/11/071101085029.htm> Why are forest fires with such a significant production of carbon dioxide acceptable and other sources not acceptable? Why aren't we doing more to proactively prevent forest fires and manage our forests?

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