

## APPENDIX A

### People and Organizations From Whom Comments Were Received

- 1 – Herron, Mark
- 2 – Guest, Brian
- 3 – Brust, Mark
- 4 – Annau, Heidi
- 5 – Amnotte, Dave
- 6 – Beach, Lance G.
- 7 – Gotschalk, Jill
- 8 – Hermes, Robert & Carol
- 9 – Dettmann, Jim
- 10 – Semple, Tom
- 11 – Blackler, Edd & Janet
- 12 – Cole, Stuart
- 13 – Holmquist, Brett & Laura
- 14 – Von Stroh, Gerald
- 15 – Burkhart, April
- 16 – Mosteller, Rosella
- 17 – Wade, Frances
- 18 – Rychwalski, James
- 19 – Watson, Ansley
- 20 – Kulina, Brett
- 21 – Browne, Bill
- 22 – Parks, Brian M.
- 24 – Phillips, Bill & Marie (1<sup>st</sup> comment)
- 25 – Thramer, Jim & Alice
- 26 – Dalen, Gary (Flathead Backcountry Horsemen)
- 27 – Payne, Tom & Charline
- 28 – Kingston, Chris
- 29 – Landon, Scott
- 30 – Sherman, Roger
- 31 – Cooper, Rachel
- 32 – Deaton, Doug (1<sup>st</sup>)
- 34 – Hurwitz, Dave (Snowmobile Alliance of Western States) (1<sup>st</sup>)
- 35 – Botkin, Steve
- 36 – Dutter, Tim (1<sup>st</sup>)
- 37 – Hutchison, William
- 38 – Salo, Ken (Capital Trail Vehicle Association)
- 39 – Stark, Ken
- 40 – Robbins, Dean A.
- 41 – F. H. Stoltze Land and Lumber Company (Brian Hobday)
- 42 – Shade, Betsy M.D.
- 43 – Rolfling, Steve (Great Northern Llama Company)
- 44 – Hobday, Brian
- 45 – Lakes, Mike
- 46 – Funke, Steve
- 47 – Kobialka, Jan
- 48 – Holman, Robbie
- 49 – Robinson, Jim & Liz
- 50 – Thorsrud, Lloyd
- 51 – Lundstrom, Sarah (Montana Wilderness Association)
- 52 – Miller, Thomas
- 53 – Jacobanis, Mike
- 54 – Williams, Nathan
- 55 – Stevenson, Tom
- 56 – Mountain Eagle
- 57 – Alderson, George & Frances
- 58 – Suesse, Ned
- 59 – Magnuson, Dotty
- 60 – Green, Steve
- 61 – Forgét, Kurt
- 62 – Hopewell, David
- 63 – Mock, Wayne
- 64 – Blank, Dee
- 65 – Jones, Jeff
- 67 – Hedrick, Charles
- 68 – Braun, Stephen
- 69 – Dillon, Sean (1<sup>st</sup>)
- 70 – White, Kerry (Citizens for Balanced Use, Gallatin County)
- 71 – Sullivan, Patrick
- 72 – Sullivan, Wendy
- 73 – Hane, Kyle
- 74 – Baker, Shawn
- 75 – Burns, Donnie

- 76 – Deaton, Doug (2<sup>nd</sup>)
- 77 – Novacek, Cal
- 78 – Jackson, Brian
- 79 – Streeter, Dave
- 80 – Long, Ben (Backcountry Hunters & Anglers)
- 81 – Stewart, Janine
- 82 – Gilman, Jeff
- 83 – Schroeter, Franklin
- 84 – Jobe, Cindie
- 85 – Slack, Dave
- 86 – Feist, Kevin
- 87 – Garner, Don
- 88 – Daughtry, Dave
- 89 – Hammer, Keith (Swan View Coalition)
- 90 – Montgomery, Arlene (Friends of the Wild Swan)
- 91 – Fiddler, Jim
- 92 – Gee, Don
- 94 – Valentine, Jim
- 95 – Metcalf, Gail
- 96 – Buchan, Carol
- 97 – Rissien, Adam (Wildlands CPR)
- 98 – Boggs, Denise (Conservation Congress)
- 99 – Mann, Marty
- 100 – Talbert, Dan
- 101 – Hodgeboom, Fred (Montanans for Multiple Use)
- 102 – Deaton, Doug (3<sup>rd</sup> comment)
- 103 – Weber, Wes
- 104 – Feist, Kevin
- 105 – Phillips, Bill & Marie (2<sup>nd</sup>)
- 106 – Yuasa-Green, Andrew
- 107 – Thornhill, Tom
- 108 – Hadden, Dave (Headwaters Montana)
- 109 – Hurwitz, Dave (Snowmobile Alliance of Western States) (2<sup>nd</sup>)
- 110 – Peterson, Paula
- 111 – Burgau, June
- 112 – Stark, Corrine
- 113 – Dillon, Sean (2<sup>nd</sup>)
- 114 – Dutter, Tim (2<sup>nd</sup>)
- 115 – Noland, Melissa
- 116 – Anderson, Rick
- 117 – Nolan, Scott
- 120 – Hamilton, Judy
- 121 – Krause, Roger
- 122 – Odgen, Jr., John
- 123 – Sullivan, Stephen
- 124 – Deaton, Doug (4<sup>th</sup>)
- 125 – Werner, Mimi

Note – the above list notes the number of the comment and the person sending the comment.

In the response to comments below, comments are grouped by main topic, such as:

**“1. Little soil damage ongoing at current use levels so why stop it?”**

Then specific comments from letters that are included in the main comment theme are listed, along with the specific comment letter number that the comments came from. For example:

- “There is no reason for closing this section of trail! Riding our dirt bikes on this trail results in little to no damage, as the trail is primarily rock. (1)” (from the above list of 125 letters, you can tell this comment came from letter (1) Mark Herron.)

After the list of comments relating to the topic, the “FS Response”, responds to the comments.

**1. Little soil damage ongoing at current use levels so why stop it?**

- There is no reason for closing this section of trail! Riding our dirt bikes on this trail results in little to no damage, as the trail is primarily rock. (1)
- Ground impact is virtually non-existent because of the rocky nature of the area. Erosion is also minimal if present at all. Neither reaches a quantifiable concern. (81)
- Low impact is the key here; no one can tell that we've been there. (45)
- This is rocky terrain. Erosion and soil impact are honestly negligible problems. Can a motorcycle truly pose a greater problem to the rocks than a hiker or horseman? Do motorcycle tires abrade a rock more than a bicycle tire, a hiking boot, or a horseshoe? (74)
- Motorized users are not the cause of trail erosion either; anybody can look at the trail and see that it is water caused, i.e., spring run off or rain storms. Tracks/imprints that you can see in the trail are from deer, elk, moose, sheep, horses, and llamas (hoofed animals) not motorcycle tires. (6)
- Noise, erosion, and soil impact are negligible, considering the terrain of the trail in your proposed closure action. A lot of the steeper falloff sections on the Napa Point trail are composed of ROCK. How can a motorcycle negatively impact a rocky trail? If the trail is ridden as intended, there is a minimal erosion impact. Considering moisture and water runoff: very few motorcyclists would attempt to cross this trail unless it were moderately dry. (54)
- There has been no environmental damage/concerns due to motorized use. (60, 61, 102)
- I haven't seen any evidence of...environmental damage. (103)
- There are resource issues about tearing up trails. It takes a pick-ax to make a trail. If there are a few ruts, it is not terrible. Horses chew up trails also...A trail is dirt, rock, and trees. People are using this as a reason to complain. (116)
- The trails do not get much motorcycle use, and it is not too heavily used. It is not too heavily traveled and abused. (117)
- Real impact on trails and wildlife from motorized activity is not documented and further, cannot be a problem based on the admittedly small amount of motorized use indicated in the EA and the rocky nature of a large majority of these trails. (102)

- The FS proposed action will close 20 miles of the finest high alpine motorcycle trails in the world for no real reason. There is no documented environmental damage, no documented “user conflict” issue...nothing. (78)
- I submit that any management decision to close these trails to motorized use is without real need. After discussions with Forest Service employees at a recent unrelated land use meeting at your Hungry Horse office, it was readily apparent that there have not been any significant environmental or user conflict issues with motorized activity on these trails. (32)
- Only when there is hard scientific evidence of a degradation occurring only due to motorized use should a trail be closed. (65)
- Instead of chasing people who are not doing things correctly, put that money into fixing the trail damage. (116)
- There is no viable reason to close these trails. Trail conflicts are non-existent and will only increase if these trails are closed because we are forced to ride in more populated areas. (36)

**FS Response:** Some comments state that the trail segments to be closed to motorcycle use receive such little use or are so rocky that there is no reason to close the trails. The rationale for closures of these particular trails to motorized use is based on a combination of factors that coincide in the project area. Environmental concerns such as erosion damage, or the potential for such damage, are only one factor that was considered in developing the proposed action. In addition to soil and erosion concerns, other environmental factors include management of trails within recovery areas for recovery and maintenance of habitat for grizzly bears. Additionally there are site specific concerns for current and future levels of use to manage trail systems where potential safety concerns related to the steepness of the terrain were considerations. No single concern such as soil damage drove the proposed action. A combination of the issues taken together led to the proposed action.

Relative to comments that the trail is so rocky that there are no erosion concerns, some segments of the Bruce Creek trail are particularly moist, susceptible to rutting, and have exhibited linear rutting in the past. The Alpine 7 trail in the project area has several areas that are particularly wet with poorly drained soils that are subject to rutting. One stretch of the trail near Thunderbolt Mountain was included in the recently completed reconstruction work on the Alpine 7. In this stretch of about 4000 feet, there are 11 tight-radius switchbacks and about a mile of the trail has been relocated. This area is very wet and, until relocated, this segment of the trail had extremely deep ruts (one area had ruts 3 feet or more in depth) in the soil. Though the use of motorcycles is limited, it has been observed that motorcycle use on the wet soils in this area in combination with areas of very tight switchbacks, has, at times, led to disproportionate damage on the trails. Though not, in itself the sole reason to recommend the proposed action, erosion potential due to motorized use is one consideration. While acknowledging that some portions of these trails are very rocky and resilient, other intermittent stretches of the trails are very susceptible to damage.

The Napa Point trail segment of the proposed action is not considered particularly vulnerable to erosion, but it is located on very steep slopes with user safety considerations as well as being in a grizzly bear recovery area. Overall management of use and the avoidance, to the extent possible, of current or potential user/safety conflicts are also reasons the Napa Point trail is included in the proposed action. Observed total use on the Napa Point trail in the summer is light on the weekdays, to many parties on the weekends. Based on our field observations, the 3.3 miles of the Napa Point trail receives the most use of any of the trail segments on or along the southern portion of the Alpine 7 trail. The reason for inclusion of this trail segment in the proposed closure is the combination of several factors. Its inclusion in the proposed action is complementary to the grizzly bear security objectives being proposed, it has relatively high use for the area (dominantly non-motorized) and it is often a narrow, rocky trail, with steep side hills. The latter attributes of the Napa Point trail make user safety a consideration in current and future management of this trail segment. In addition the overall management of the trails with Napa Point included results in a consistent, logical system that does not isolate short segments of motorized and non-motorized uses. Again all the factors weighed together and in connection are why the Napa Point trail was included in the proposed action.

**2. Motorcycles definitely do cause trail damage. (some comments had statements that imply that all such use should be stopped, including areas beyond the proposed action)**

- Motorcycles damage trails. (92)
- Prohibiting motorcycles will reduce trail erosion problems and reduce maintenance costs. (7, 9, 11, 13, 14, 15, 17, 19, 20, 30, 31, 40, 47, 49, 57, 83, 84, 86, 89, 92, 95, 98, 104)
- Motorized vehicles, if operated only on trails, create hazards for hikers and pack animals, but it has been my experience that motorized vehicles do not stay on the trails provided and create extensive damage to sensitive areas such as bogs, alpine meadows, and streambeds. This necessitates maintenance and repairs at a time when there is little or no funding or available manpower to complete them. (10)
- The closure will reduce erosion cause by wheel-spinning dirt bikes. As the EA mentions, the fragile soils, and steep trails of the Southern Swan Crest area are especially vulnerable to erosion. Dirt bikes typically steer wide on switchbacks, running up on the cut surface above the trail. This creates a continuously eroding surface. (42, 57)
- This closure will also cut down on erosion by spinning wheels, which can be especially severe in alpine areas. (57)
- My major concern is the erosion that occurs on the turns and steep area *{from motorcycles}*. (92)

- Then there’s the rutted, muddy trail, dust, and kicked up rocks to deal with... (22)
- I find it a sad testimony to our policies protecting the environment to allow motorized activities in such a beautiful and fragile ecosystem. In the ongoing destruction of our natural habitat, we must take advantage of opportunities to protect these areas. (18)
- Whenever the trail surface is moist from rain or snowmelt, motorcycles may create a rut 2 or 3 inches deep. This rut captures subsequent runoff and channels it down the trail, defeating the drainage dips that are often built-in to promote good drainage. (57)
- The alpine terrain of Bruce Creek to Alpine 7 to Napa Point is particularly vulnerable to damage. (64)
- This ecosystem is high alpine, and very fragile for any vehicle use and closing the trail will reduce trail erosion. (95)

**FS Response:** Several comments stated broadly that motorcycles damage trails, create hazards for other users and that the closures will reduce erosion. While agreeing that the proposed action will reduce erosion in several site specific areas along the trails recommended, we note that the proposed action is recommended due to several site specific considerations, and the combination of circumstances (including wildlife habitat, current use patterns, and terrain considerations) that exist in this specific area have led us to the proposed action.

**3. This is not a trail likely to appeal to the riders most likely to create trail damage.**

- This is not a trail likely to appeal to the riders most likely to create...needless trail damage – you do not spin the tires here! (32)

**FS Response:** As addressed in responses to comments 1 and 4, there may not be pioneering of new trails in this area. There are segments that can and have received specific trail damage and remain susceptible to such damage due to moist soils.

**4. Trail issues are due to lack of maintenance, not “potential erosion.”**

- On page 22 of the EA, you state; “potential erosion problems” and the FS should not base closures on potential problems. (70)
- The major problem with the road/trail system is the design and maintenance of them. Better maintenance by the Forest Service would eliminate most of the problems with erosion. (67)

- If it is true that motorized use is small, then the erosion caused by motorcycle use should be minimal; the trails are most likely dry when in use. (67)
- These trails are extremely technical for the most part and discourage fast or aggressive riding thereby reducing trail impact and user conflict. (102)
- *{Are you closing these trails}* because you do not want to do trail maintenance? Motorized trail users are willing to help provide trail maintenance, talk to the local clubs. (4, 38, 72, 102, )
- Why not use motorized users to patrol, for safety and evacuations, for signage update and maintenance, for hauling in trail supplies. Have you ever thought about laying down your sword and just asking the motorized for help without an agenda that will fail us all, cut down others, discriminate against one of the users, bottle neck us into small areas where the concentration WILL erode the earth and we WILL leave a trace. ...Please hear our thoughts on this and stop shutting down trails for undue reasons and bottle necking us into bad situations. (72)

**FS Response:** Some comments were received stating that the major problem with erosion is due to poor design or maintenance. While agreeing that both maintenance and trail design can help improve erosion related concerns, the trails in the proposed action contain extensive areas where relocation is not always possible, and where design and maintenance to prevent erosion is difficult due to the nature of the soils/moisture conditions involved and the remoteness of the sites. Again, some of these comments seemed to be premised on the assumption that erosion was the sole reason for the proposed closure, but as discussed above, there is a combination of circumstances, in which erosion is one consideration, which led to the proposed action.

Some comments said that potential for erosion should not be a factor in our decision. A large portion of the Alpine 7 and Napa Point trails have been reconstructed largely due to known erosion issues, and the current conditions on the Bruce Creek trail have been observed. Those areas which are most susceptible to erosion are known due to a combination of presence of recurrent moisture, soils with little rock or drainage, and steepness of slope. In combination, these factors create areas which currently are more susceptible to erosion and or which are observed to have existing erosion problems. It is one of the jobs of trail managers to evaluate the potential of existing erosion in development of the appropriate management for various segments of our trail systems. In the evaluation of this erosion potential, existing and future use are elements of trail management that are evaluated.

**5. The general area of the Swan Crest is too fragile to host motorized use.**

- The thin soils and short growing seasons of the Swan Crest make it a very poor place for motorized traffic. We support access for all, but there are important habitats where motor traffic is simply inappropriate. (80)

- It doesn't take training to observe the difference in impact to a trail made by any motorized conveyance compared to foot-traffic. I have watched large groups of people walk through the woods and compared the impact of hundreds of footprints to the impact of a single, motorized vehicle traveling the same route, and there is almost no comparison... Hundreds of hikers could use a trail for years and not cause the erosion damage that is almost inevitable from even a few motor bikes. (91)

**FS Response:** Some comments suggest that the entire Swan Crest or any alpine area is too fragile for motorized use. Not all areas of the Swan Crest have the same combination of factors to the same degree as the trails within the proposed action. Many segments of Alpine 7 Trail are not currently displaying rutting and erosion to the degree as some trail segments in this proposal. This decision is limited in scope to an area where the combination of circumstances exists that leads us to the proposed action.

**6. Motorized users help by keeping the trail open by cutting out down trees each year.**

- Motorized users help by keeping the trail open by cutting out down trees each year. (24, 75, 76, 105)
- Why do you feel the need to close down what very little is left in our trail systems to the motorized? Why not ask for our help, its free and volunteers would love to help you keep trails open, clear trails, put up signage for you, cover many miles in a day...Let us know what to fix. (72, 116)
- Instead of closing trails, people should clean up after themselves, stop and fix it... He would take an hour out of a ride, firm up a trail corner or put in a water diversion. It is good to manage a trail and to be allowed to use it. (114)

**FS Response:** All maintenance work by employees, volunteers, and partners is valuable. This includes logging out of trails. However, we are still experiencing issues as described in response to comment 4.

**7. Why doesn't horse use damage cause you to prohibit them?**

- What about horses? Have you examined the trail erosion from horses? Yes, they are quiet, but they tear up a trail and rains just wash a big rut in the trail. (24)
- Damage created by horses can be far greater than that by a motorcycle. (81)
- The past rutting by horses has been caused during the wetter season. (50)

**FS Response:** Some comments were received that horse damage can cause greater problems than motorcycle use. While agreeing that stock use can cause trail erosion damage, the decision is not premised solely on erosion potential or damage along the trail system. Grizzly bear security is enhanced with the reduction of motorized routes within a grizzly bear recovery area. The proposed action will reduce motorized access, and, particularly in the Jungle Addition Bear subunit, will help the bear subunit move towards standards of the Forest Plan. Non-motorized uses such as stock use or hikers are not modeled to reduce security as dramatically as motorized uses.

In addition, though trail damage from stock use is a consideration, motorized use, particularly in steep, moist conditions, is more difficult to mitigate than stock use (for the same amount of use) in that the torque to the drive wheel of a motorcycle does tend to create ruts, if high soil moisture and steep slope conditions are present, which can route water down slope. Also, the waterbars designed on steeper trails to route water off the trail, do not appear to be affected as quickly by the hoof strikes of stock use as they are by the torque from a drive wheel. In steep ground, stock generally can negotiate a tighter turning radius with less soil disturbance, than can a motorcycle.

All trail use leads to some degree of erosion. Though we do not believe that motorcycle use always leads to unacceptable trail erosion, we do believe that the combination of terrain, moisture, and soil conditions on some portions of the trails in the proposed action can be more readily impacted by motorized use than trails in less susceptible circumstances. That, in combination with the other environmental, terrain and use patterns led us to the proposed action.

**8. The trail system is not that tough, you are eliminating some easy riding which is not what you characterized the trails as.**

- Since blasting of the rock in the trails last year there really are no difficult or expert sections of these trails either, pretty much anybody can navigate them as the trail crew did an awesome job. (6)
- There are many statements regarding only expert level riders are able to navigate these trails, which is untrue...These trails are a bit more difficult to navigate than say Columbia Mountain or Strawberry Lake trails but they are not expert only trails by any means, you just have to go slower. (6)
- I have had a teenage son ride with me for years on these trails. I certainly wouldn't call him an expert when he began riding; however, he was still able to make it through the entire trail system in question. (45, 116)
- *{Please leave this trail open because}* the alpine trail is one of the most beautiful and demanding rides in the Flathead. (2)
- On page 16 you state, "The great majority of trails in the Proposed Action, when traveled by motorcycle and mountain bike riders, are only used by expert riders because of the challenging nature of the trails." Is that a reason to close the trails?

Because only experts can ride them? Taking away this trail because it is a difficult trail is not a valid reason to close it. You stated yourself it does not get much use, so why close it? (4, 38)

- I am greatly concerned by your proposed action to criminalize motorcycle access to 20 miles of some of the most challenging trails in the world. As a local, I am privileged to have the opportunity to legally ride these wonderfully technical trails. I feel it's my duty to help preserve access to these trails, not just so I can ride them, but for my friends and fellow riders who dream of someday being able to take a "ride of a lifetime" on trails like the ones you propose to criminalize. (32)
- I can attest that these trails are some of the finest, most challenging trails anywhere in the world. They provide an experience that cannot be replicated on what you call "more suitable" terrain. The quality of the experience must count for something and given that these trails provide a nearly unique experience for motorized users, it is important that the opportunity to legally ride it be preserved. (32, 102)
- Experienced motorcycle riders know that this trail has some of the finest, most challenging trails anywhere in the world. Where will this caliber of trail for the expert motorcycle rider be replaced in this ranger district? (34)
- It is not about the number of miles of roads closed, it's about the real, on the ground impact on an extremely limited but highly coveted motorized recreational opportunity that should drive your decision making process. (32)
- The bad apples, the so-called "one percenters," just can't ride this stuff. That's one of the fundamental reasons it's so important to retain access for those of us that enjoy this kind of riding challenge. (32)
- We ride these routes for an extra challenge for the same reasons I climb mountains in Glacier Park and the Missions and the Swan Range. I can read my maps and find quiet recreation *elsewhere*. (50)
- It is a very limited section of single-track trail that demands a high level of skill from a dual-sport rider. Anyone who can read a topographic map can determine the level of difficulty involved with riding a motorcycle on that trail. (54)

**FS Response:** Some comments were received that the trails to be closed are not difficult and that the closure of them will deny opportunity to more average users than we might believe. We received many comments on the proposed action and the majority of those who claim to have ridden the trails characterize them as difficult or expert, though some sections are thought to be easier. In attempting to generally characterize the trail experience in the Environmental Analysis, the Forest Service trail managers thought that, as a whole, the trails involved would best be characterized as expert. Based on the comments we received from users, different people

gauge the difficulty of the trails differently. Ultimately, however, the difficulty or ease of riding the trails was not a primary factor in the decision to close the trails to motorcycle use. Rather, it was the combination of environmental concerns that led to the proposal. More detail on the combination of factors can be found in response to comment #1.

**9. You are taking away a truly unique, challenging trail ride and it needs to be preserved not taken away. It is a rare opportunity that needs to be preserved.**

- These trails present a rare opportunity for those in search of Alpine single-track. (62)
- The trail systems in question are some of the only remaining high alpine trail systems open to motorized travel in all of Montana. I urge you to reconsider the conclusion of the EA, and keep these trails open to motorized travel. (69, 113)
- These trails offer motorized users places to go without a lot of people {due to its remoteness}. (114)
- This section is only open about two months anyway with the weather, elevation, and snow. August and Sept. It is marked expert only for all uses. (72)
- On page 16, the following statement appears, “the great majority of trails in the Proposed Action, when traveled by motorcycle and mountain bike riders, are only used by expert riders because of the challenging nature of the trails.” This is precisely the reason these trails must remain open. Expert riders seek challenges. Expert riders deserve challenging terrain where user conflict is rare and where environmental impact is unlikely. (74)
- The EA rightly assumes most if not all motorized use of these trails is by expert level riders – riders who are less likely to damage trails, be involved in “real” user conflict, and who maintain their machines to a higher level, including periodic replacement of silencer packing to reduce sound levels. (102)
- It is clear to me after reading the EA and letters from users that as a motorized trail system, this particular network of trails provides a rare and highly valued experience to those few users fortunate enough to avail themselves to the opportunity. This trail system and others on the Swan Range currently provides the motorized community one of the best, if not only, alpine experiences in the area. Your EA explains that even though available the public has not proved to be a significant threat to the trail nor to the resources it accesses...If there are *{problems}* I hope the district would take reasonable steps to address the issues and not simply resort to the elimination of one use or another in order to expedite and unsophisticated solution. (46)

- You do not have actual use numbers, but “based on field observations from FS trail crews, trail managers, etc. the great majority of users are non-motorized.” Because (possibly) more hikers use it than motorcycles, it should be closed to motorized? (4, 38)
- The trails themselves discourage fast, aggressive riding, thereby greatly reducing both sound levels and the possibility of conflict with non-motorized users. It’s simply not possible to go very fast on these trails. This is not a trail likely to appeal to the riders most likely to create a traditional “user conflict” scenario or to create needless trail damage – you do not spin the tires here! (32)
- There are simply no real conflicts in any significant number. Further, expert riders, as a group, tend to be far more concerned about avoiding conflict than more casual riders. They generally maintain their machines to the highest standards, including replacing muffler packing (fiberglass) to reduce sound levels, and place a high value on retaining the right to legally access public lands. Your EA correctly concludes that these are the riders most likely to be encountered by non-motorized users on these trails. (32)
- The only time I run into "other" users while riding my motorcycle are on the Columbia Mountain and Strawberry Lake trails. Your report states that the proposed trails have very little motorized use, which would lead me to believe that there is very little conflict. Then why close the trails to those of us that do occasionally enjoy these trails in a responsible and legal manner? (35)
- Making assumptions that the growth in our region will lead to conflicts with different users in the area is a bit presumptuous...the area is steep and more or less a trail for expert motorcycle users. That alone keeps most riders (horse and bike) out of country like that. Very few people moving into our area are “Expert” motorcycle riders. Generalizations like the ones towards the bottom of page 17 in regards to percentages of population growth are being used out of context. Not everyone who is moving into this area is a forest user (retired people? children?) and very few of them are expert motorcycle riders. A relatively small group travels the backcountry up there.(75)
- "Currently the Napa Point to Alpine 7 to Crevice Lake trails are among the most popular hiking trails in the Southern Swan Crest area and receive very limited motorcycle use. Prohibiting motorcycle use would reduce the potential for future use conflicts" and then on Page 7- "Currently, motorized use is very low and non-motorized use is relatively high on these trails. It is likely that this area would see heavier motorized use in the future with the resulting increased potential for motorized and non-motorized user conflicts." How does the Forest Service reach these conclusions about the number and types of users when you have no data of any kind about the past or current use of these trails? Indeed, if you have such data, please provide me with copies. The truth is that these trails are rarely used by hikers beyond short day trips. (81)

- This trail does not see much use from motorcycles, so I feel like closing it to them is not in the best interest of following what I believe is your duty, which is to protect and make available our public lands to the public, not just a select few. (39)
- If there are so FEW motorcycle riders in the area (as stated in your assessment), why close the trail to them? (54)
- You mention that the motorcycle use is very limited, because of terrain. This isn't going to change. Motorcycle use won't increase much. (48)
- The trail is not overused by either hikers or motorcycles. (105)
- If there are few seasonal riders on these trails, why are the trails to be closed to these few responsible riders? A perceived increase in use is just that: perceived. It is a generalization, a forecast, but it is not backed up by any studies scientifically predicting that usage or impact will increase. Changes to access must be backed up by specific, scientific documentation, not what amounts to a hunch. (74)

**FS Response:** Some comments received stated that the motorcycle closures unnecessarily would eliminate a unique, challenging ride. These comments express the concern that the ride is a rare opportunity and that, with the limited use, conflicts were insignificant. Though the numbers of motorcycle riders using the segments of trail to be closed is limited, several factors combine to lead to the proposed action. The Bruce and Alpine 7 sections of the trail are within a grizzly bear subunit where the reduction of motorized trails will help improve grizzly bear security. Non-motorized uses are not modeled to affect grizzly bear habitat security in the same way as motorized uses. That fact, coupled with terrain and soil conditions specific to the area along some segments of these trails, result in proportionately more impact or potential impact from motorized uses in this area than are (or would be) experienced from non-motorized uses.

The proposed action leaves motorcycle use in place in other nearby areas where the combinations of conditions have lesser impact. Though the proposed action closes about 20 miles of trail to motorcycle use, about 40 miles of trail in the Southern Swan Crest (and about 52 miles in the Northern Swans) remain open for motorcycle use in areas where the combination of fragile, moist soils, steep terrain, grizzly bear security, and potential user conflict, though present in places, is not as extensive as it is on the trail segments recommended for closure. The proposed action will also result in the reduction of potential future user conflict/safety issues along steep side hill trail segments on the Napa Point trail. On this trail segment, non-motorized day use is higher than on other trail segments in the Southern Swan, largely due to the high elevation trailhead. The proposed action would reduce the site specific potential for user safety in this area while still allowing both types of use to occur on other portions of the trail system.

**10. It is a problem to eliminate loop rides.**

- This proposal eliminates loop rides, which is a problem. (113, 116)
- Closing this trail shuts off one of the last arterial trails into the Spotted Bear area that crosses over the Swan Crest serves no logical purpose. (75)

**FS Response:** The trail as described did eliminate a link to other existing trail loops as described. Other loop opportunities outside the scope of the proposal remain intact.

**11. There is limited opportunity for motorized recreation on the forest and this just reduced it while leaving an unfair proportion for non-motorized.**

- I have lived my entire life in the Flathead Valley. I have continually seen closures for motorized vehicle use in our public lands...I am not sure of the reasons for the closure, but for me I would like this area to stay open and available to all. (2)
- There are very few places to ride our recreational vehicles. In the past, I have seen more and more motorized trails be shut down. It's understandable that some areas are not for riding and it's necessary to close them off, but I believe there are some that just don't need to be closed, and this is one of them! (88)
- Obviously, your next step would be to close All Motorized use in the Flathead. This is inconsistent with providing recreation to all users who enjoy the National Forest. (4)
- 92 miles would remain open to motorcycling use and 167 miles would be closed. This is unacceptable. (4, 38)
- Too many trails are already closed do not close anymore, in-fact you need to re-open a lot of trails. (77)
- It has been a disturbing trend for too long to see more public land closed to motorized use. Of the 2,600 miles of trail in Flathead National Forest less than 200 miles, or 7.6%, is available for motorized use. (36, 116)
- On the Glacier View District and on Noisy Face, spring use was closed down...Bond Creek Trail on Swan Lake was closed...Motorcycles have lost trails. If trails are closed, open up trails elsewhere to compensate...He was run out of Noisy Face to Blacktail. Motorcycles are shoed off to the back forty, and then it starts all over... Up the North Fork, on Moose Mountain and Elam Creek motorcycles have been booted out over the last 4 to 6 years. (116)

- The Flathead 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. (38)
- How many miles in the Spotted Bear Ranger District are limited to motorcycle use only, to help “reduce the potential for future use conflicts”? Let me guess; ZERO? How many miles of motorcycle use only trails are in the Flathead National Forest (FNF)? Again, let me guess; ZERO. Why is it that the FS always uses the excuse of “potential use conflicts” for the sole purpose of eliminating motorized use? In case you weren’t aware, eliminating non-motorized use would accomplish the same goal. (34)
- How does eliminating motorized access solve these problems any better than eliminating non-motorized access? In the very same way, eliminating non-motorized access will separate the user groups and guarantee the absence of future potential user conflicts. Under such a non-motorized closure, I’m certain the Forest Service will be able to adequately police the trails by use of helicopter surveillance, motion detector cameras, and motorized patrols to document and arrest any criminal access by non-motorized users. (81)
- Motorcycle users are being squeezed into less areas, through only the fault of uninformed narrow minded self-serving individuals, disorganized user groups, or misleading reports. We as a group have to stop this tide, and this trail is an example of a use that is being terminated for all the wrong reasons. (38)

**FS Response:** Some comments expressed concern that there is limited opportunity for motorized recreation on the Forest and that this action would unfairly further reduce the proportion of motorized trail experience. The proportion of motorized and non-motorized uses on the Forest has resulted from a combination of social and environmental factors. Much of the Flathead National Forest is steep, heavily forested land where trail construction and maintenance is difficult in contrast to some other National Forests where terrain is relatively gentle and vegetation less dense.

About 89% of the Flathead NF is habitat in which the amount of motorized use is limited to provide security habitat for grizzly bears and other wildlife. Grizzly bear habitat is limited across the National Forest system and the Flathead National Forest has one of the highest percentage concentrations of habitat of any Forest in the system. In addition, included in the 89%, the entire Flathead National Forest has a high percentage (46%) of Congressionally designated wilderness. Motorized use is not authorized in these areas.

Motorized use on a high proportion of the Flathead National Forest is limited due to the overlap of these circumstances. The Forest is continuing to look at the potential for development of motorized trails in portions of the forest where fewer conflicts with motorized use exist. Development of future trail systems in such areas will be dependent on appropriate site specific

environmental analysis of effects, and, if approved, will require partnerships for construction, responsible use, and maintenance.

The extent of motorized use on the Flathead NF will continue to be tempered by the circumstances described above.

**12. Some comments asserted that Bruce Creek is the only motorized trail to the east side of Swans.**

- Closing the Bruce Trail leaves us with no trail at all on the east side of the Swan Crest. The closest open trail on the east side would be Jimmy Ridge. Please, keep these few existing trails open to motorized users. (6)
- I feel one of the reasons for closing this section is because it's the only single-track motorized trail on the Spotted Bear District. Think of everybody, not just yourself. I love this trail system and would like to be able to enjoy it for years to come. (88)
- The latest proposal from Spotted Bear District Ranger Deb Mucklow is to close the last trail over the Swan Range (Bruce Creek-Napa Point) between the Jewel Basin south to Danaher Mountain north of Ovando, a distance of approximately 110 map miles. This has been a traditional multiple use trail that provides one of the very few opportunities for motorized access across the Swan Mountain Range to the South Fork Flathead River from the Flathead/Swan valley. (101)
- The Bruce Creek Trail is the only trail open on the Spotted Bear for motorcycle use and should remain open with seasonal open and close conditions for our balanced use. (50)

**FS Response:** Some comments were received that indicated that, with the closure of Bruce Creek trail, no trails open to motorized use on the east side of the Swan Crest would exist. North of the project area the Quintonkon Creek Trail (#72) would remain open to motorcycle use to the east, as would several trails north of Jewel Basin.

**13. Some comments indicated that the proposal was biased or unfair given the amount of area open for non-motorized and that there is a generalized unfair bias against motorized use.**

- 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 Bruce Creek to Alpine 7 to Napa Point Motorized Trails Travel Management Project. (38)

- The loss of any of the existing high quality motorized routes in the Flathead 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. (38)
- It is incredibly out of balance in the Spotted Bear Ranger District with 1,044 miles of non-motorized trails and 40 miles of motorized trails. Where is the equal opportunity?...In order to bring equality to the allocation of non-motorized to motorized trails in the Spotted Bear Ranger District either convert 502 miles  $((1044-40)/2)$  of non-motorized trails to motorized trails or 1004 miles  $(1044 - 40)$  of new motorized trail must be constructed. The proposed travel plan closures are a step in the wrong direction and would create an even greater imbalance. This demonstrates how completely unreasonable the current proposal is. (38)
- You mention the 109 miles of trails in the Southern Swan Crest. You totally ignore the hundreds of miles of trails on your Ranger District that are available to hikers in the Bob and other portions of your Ranger District. All of the experiences that you describe are now available to Forest users. Closing approximately 1/3 of the motorized trails in your district isn't going to change this. (48)
- The balance of motorized vs. non-motorized trails is heavily weighted towards non-motorized and non-mechanized use. Your analysis area did not include wilderness areas and the available non-motorized and non-mechanized use that is truly available in your area. CBU requests that you include the wilderness opportunities available for recreation in your analysis. When wilderness area is included, the result will be a more accurate view of the opportunities available in your area. This is very important when your duty is to provide a broad spectrum of recreational opportunities in a variety of settings. (70)
- This alternative 2 is unacceptable change based on noise levels and user enjoyment with no noise. There are so many acres of land available to foot traffic and horses only...There are almost no motorized trails for our use in your system. Also, if they want no noise go to the wilderness areas or the park. (71)
- We as motorized users have very few choices and these closures are not needed. There is no place in your system that I as a motorized user can go for a ride and not see a non-motorized user. Why then do you need more areas that a non-motorized user can go where we cannot? This in itself is bias closures for the agenda of closing it all to motorized...The motorized user is continually affected by closures we cannot use this area if you close it. Where does our "experience come from now?" (71)

- The FS just wants to keep the motorcycles out... The EA says there are too few motorcycles, and keeps with the unsaid agenda of no motorized use... Right versus wrong: If Montana has 3% black people, it would be like telling them to leave because there are so few of them. It is the same as saying that there are only 3% motorcycle users and telling them to leave. There are so few motorized users and the majority of people do not like them, so close them out. This is morally wrong. FS says to ignore the minority numbers of motorcycle users. (113)
- It does not matter the logic; the level of use, impact on bears, land designation now; the FS does not like motorized, and the people on foot do not like motorized. (113)
- Please make an honest effort to balance public benefits by considering the vast availability of existing non-motorized opportunity in the immediate vicinity of this one last high quality motorized opportunity for Swan to South Fork ride, the speculative and totally unnecessary need for this closure, and choose No Action. (101)
- Why do ORV get booted out of areas due to a minority conflict. If you were to count the miles of trail available to ORV use verses hikers, we would be only a small percentage of the total trails. It seems like every time I turn around we are losing our limited trails. Are we expected to over use the small number of trails available to us or just quit ORV use or outlaw ride. We have all of this forest around us and only a handful of areas to ride. The hikers have lots of trails everywhere. (105)
- Non-motorized users already have more trails and more miles of trails available to them than we do, plus they get to use the ones we get to use as well, which they do, and we don't have a problem with sharing like some non-motorized people do. (6)
- Losing another 20 miles of motorized recreation access is unacceptable. The Flathead National Forest is already mostly wilderness or non-motorized. If the hiking population is looking for solitude and quiet, then there are 2,800 miles of trails in the Bob Marshal, Great Bear, and Mission Mountain wildernesses, as well as the Jewel Basin and Whitefish Range. There are also 700 miles of hiking trails in Glacier National Park for the quiet trail user to explore. (29, 117)
- If that *{non-motorized experience}* is the total reason they are on that trail and wanting that experience, then they can go to Glacier Park and the hundreds of other trails already closed down to motorized users. There is very little left open for motorized use & wise use compared to open for hikers, bicyclers and horseman. (72)
- It is each individual's choice of whether to go to an area to recreate or not. There are plenty of areas designated solely for non-motorized activities, especially in

Montana. We have National Parks and Congressionally designated (and de facto) Wilderness areas of far greater acreage than most of the individual lower 48 United States. There are many places for the “quiet” users to recreate. The trails you propose to close are so close to the Bob Marshall and Great Bear Wilderness areas that no one can possibly claim that it is a burden on non-motorized users to find adequate opportunity for “quiet” enjoyment. (81)

- Non-motorized opportunities abound in surrounding public lands very nearby in various congressionally created Wilderness areas. (102)
- He owns 8 horses and has dirt bikes and 4 wheelers. Prefers not to have it closed. Leave as many options and choices for all. (121)
- If folks do not want motorized use, go into the Bob Marshall, Glacier Park, Jewel Basin, etc for a “wilderness experience.” (45)
- Spotted Bear Ranger District is a major gateway to approximately 1.6 million contiguous acres of the Great Bear/Bob Marshall/Scapegoat designated wilderness. Even within the small non-wilderness "multiple use" area of the Spotted Bear District (and other Districts) most of the existing roads and trails are already closed to motorized use. In addition, there is the 15,000-acre Jewel Basin Hiking Area and the 71,000-acre Mission Mountain Wilderness on the west side of the Swan Valley permanently closed to all forms of mechanical transportation that provides even more "quiet recreation" opportunities within a few miles of the proposed closures. (101)
- The 2001 National Recreation Visitor Study, (Cordell, 2004) revealed that only 1.57% of total Flathead National Forest recreation visits occurred in existing wildernesses that already cover 50% of the Forest. This actual recreation monitoring data as well as demographic data on our increasing numbers and age of people do not support the "need for more solitude," but instead supports the need to increase motorized access for the vast majority of users. There is only about 260 miles of the approximately 2100 miles of trail on the Flathead National Forest open to motorized use and most of those are in the heavy timber of the Tally Lake Ranger District. (101)
- I feel that this proposal is part of a negative agenda against all motorized traffic on all single-track Forest Service trails. Hikers and bicyclists simply want that pristine area to themselves, and do NOT want to share it with anyone else. (54)
- The use of terms like "Solitude" in Forest Service assessments is VERY subjective in nature, and is agenda-driven by specific wilderness groups that want to exclude the general public from access to Forest Service lands. I DO NOT support such exclusion and elitism. (54)

- Please do not let environmentalists control all of the available area. There is the Jewel Basin already, plus lots of other wilderness areas set aside. (24)
- I know some areas reasons need to be closed, but when this happens there should be other areas opened up for motorized use. With more and more people using four-wheelers, I think it would be a good idea to open some of the loop roads for them to ride on. It would keep them off the main road and would keep the brush down on these roads so if you have to go in there for fire, it would be easier. (85)
- I am in full support of closing this trail section to motorized travel...I also believe that another trail should be added in another section of forest to replace this trail lost to the motorized users. (24)
- Please quit trying to shut us out of the land that we pay for. (99)
- I would like the Forest Service to look at this proposal and other similar trail closure proposals with a more open mind than has been demonstrated in the past several years. I have hiked these trails and in the future I hope to ride my motorcycle on these trails as well. (100)
- I enjoy hiking and bicycling as well, and there are already plenty of places to go where OHVs are excluded. I see no reason to add more. (58)
- The logic that seems to be used is that if it is not often used it won't be missed and that other people might use the area more. That is simply not true; it will be missed. Please reconsider this action and preserve some of the finest high alpine single-track in the Rockies for all users. (56)
- Trails should be used, shared, and maintained by ALL, including motorized users. (103)
- Use of public land by motorized vehicles, bike riders, horseback riders, and hikers is an acknowledged legitimate use of our public lands. (107)
- Have a balance with non-motorized use – Glacier National Park, Great Bear, and Bob Marshall Wilderness have non-motorized use only... He would like a breakdown of the trails in northwest Montana available to foot, stock and motorized. He would guess trails open to motorcycles is fewer than 5%. (113, 114)
- It is suppose to be multiple-use on the Forest. Need to educate the horse and foot users, there is enough room for everyone. (116)
- I believe there are currently not sufficient trails on National Forests open to motorized use. The Forest Service is supposed to manage the NF lands for multiple uses. Motorcycles and ATVs are an element of those multiple uses. The

ratio of motorized trails to those only open to non-motorized recreation is staggering and unfair. If Alternative 2 of this proposal is chosen, this ratio will become even more lopsided. The management of Forest Service lands is paid for by the public. They are meant for everybody to enjoy, not a select few. Many people choose to enjoy these lands via motorcycle or ATV. (44)

- You are going against your very own words and goals...To provide the highest quality experience for all users. (72)
- I am concerned by the use of the term "Solitude" in a Forest Service EA. The use of this word is very subjective. Motorized users seek solitude and an individual experience in very much the same way as other user groups. That "wilderness" groups utilize this term and press its use in FS Environmental Assessments smacks of elitism. Access restrictions should be calculated based on overall negative impact to protected or indicator species, not by popular demand of elitist user groups. Our National Forests are held in trust by the Forest Service for the responsible enjoyment of all users. (74)
- Alternative 2 "Closure" is clearly eliminating one user group in order to accommodate another. (81)
- He feels it is the Forest Service's intention to close as much of motorized trails for bears. The FS does not like motorcycles, there is a bias against motorcycles. (113, 114)

**FS Response:** Some comments expressed the position that closure of any motorized routes was imbalanced, or unfair, given the amount of non-motorized use trail that exists on the Forest. As described in the response to comment 11, the management of the trail systems on the National Forests is largely driven by the combination of vegetative, terrain, soils, wildlife, and Wilderness factors that are unique to each Forest. The proportion of motorized to non-motorized trails results from this mix of issues. The Spotted Bear Ranger District for example, is predominantly Wilderness where motorized trails are not allowed and for this reason has a very high proportion of non-motorized trails. The trails systems within the National Forests vary widely from place to place. Some Forests in the Midwest and Southwest have a higher proportion of motorized trails than do some of the more rugged, densely vegetated forests in the west with a higher proportion of Wilderness and or threatened or endangered species habitat. Most Forests have a higher total proportion of non-motorized trails than motorized. This is common not only due to environmental issues, but also due to the fact that many of the trail systems were developed decades ago, providing for mainly foot and horse access on relatively narrow paths. Motorized trails can be proportionately somewhat more expensive to construct and maintain, particularly on steep ground. Opportunity for motorized use on the National Forest will vary by the inherent features and circumstances offered by the land. As discussed in the response to Comment #11 above, the Flathead Forest is considering development of additional motorized trails in areas where there are fewer resource conflicts than are found in the project area.

**14. Why aren't mountain bikes also excluded.**

- The desire to separate users is not justification for trail closure. Motorized use is low and infrequent in this area, but this area has a long history of motorized use. These lands are public and should be available for use by all citizens, not a select approved few. Little by little, motorized use is being squeezed out of historically open area. Motorized use should be considered a traditional use for the Bruce Creek to Alpine 7 to Napa Point trail system, and it should remain open. (82)
- What is not addressed is the mountain bikers are not proposed to be shut out of these trails or the horse users. These users have far more opportunity than us motorcycle users; they can use all trails and old logging roads of the Bunker Creek drainage... I believe it is not fair that we be constantly restricted in our use, when the other users are not losing their rights. (50, 115)
- These trails are not for the inexperienced on horseback or on a motorcycle. ...its isolation and lower use by horseman and motorcycle riders should not be prohibited. Use of horses on this trail is not in question at this time however but I am one of both of those people and I think that the parallels need to be drawn in my own case. Less use in one area by certain groups should not be any grounds for closing the area to them. (75)

**FS Response:** Some comments asked why mountain bike users are not also excluded from these trails. As in the response to Comment 7 relative to horse use, the primary reason not to exclude mountain bike use is that, being non-motorized, the impacts to wildlife security are modeled to be considerably less than motorized use. Additionally, though mountain bikes can cause wheel rutting in steep and moist conditions, there is a noticeable lesser degree of impact on steep, moist soils compared to a motorcycle. The motorcycle delivers more powerful torque to the drive wheel and weighs considerably more than a bicycle. This combination, in steep, moist, trail conditions, on more fragile soils, can lead to more extensive erosion issues than is observed from mountain bike use in similar terrain at the same use levels. In moist, steep conditions, or on extremely tight radius steep switchbacks, bicycle riders can (and often do) carry their machines over the problem areas. Again, it is the combination of impacts and potential impacts on portions of these specific trails from motorcycle use compared to bicycle use that leads to the proposed action. Not all trails have this combination of circumstances.

**15. You force us to break the law by limiting our opportunity.**

- *{Closing more trails}* pushes us into an outlaw situation where we break rules to enjoy our hobby. (24)
- Please stop the senseless criminalization of off-road trail riding. (60)
- I believe there is sound justification in designating Alternative 1 as the preferred alternative by the Forest Service; documentation found on page 21 of the

Environmental Assessment - "It is reasonable to assume that under Alternative 1 some users of the Proposed Action trails may experience conflict or less-than-satisfactory recreational experiences and in turn may modify their use of the trails or their view of the experience. As the use of these trails by non-motorized users is low to moderate and very low by motorized users these effects are expected to be minor." Please do not criminalize motorized access of these trails. (81)

- To cut out a 20 mile section in the middle of a trail system is silly, and will only cause you to be responsible for more signage, more patrolling, and more people trying to sneak through and cheat. (72)

**FS Response:** Some comments suggest that these closures force motorcycle riders to break the law, by limiting opportunity. The opportunities are appropriately limited due to the effects of the riding. There will be many miles of trail still available adjoining the project area where motorcycle riding has less potential for adverse impacts while still providing a quality opportunity. Riders also have the opportunity to participate in the potential development of future trail systems in areas with fewer inherent conflicts with motorized trails. Responsible users will not be forced to break the law to enjoy their sport any more than an angler is forced to break the law because some streams are closed to fishing. Alternative 2 would not eliminate trail segments from the middle of an otherwise motorized trail system. As addressed in responses to other comments, the selected alternative is designed so as to not fragment trail segments and leaves logical, connected, starting and ending points for motorized trails.

**16. What are the numbers of acres or miles of trail open and closed to off road vehicles?**

- There is getting to be less and less area open to off-road vehicles. Have you ever compared the area open and closed to off-road vehicles in terms of number of trails or acres? (24)

**FS Response:** As described in Table 5 on page 23 in the Environmental Assessment, in the entire Swan Crest Area, there are a total of 259 miles of which 112 miles are open to motorcycle use, and with this proposal 93 miles would remain open to motorcycle use.

**17. Comments in support of Alternative 1.**

- I support Alternative 1 since it will keep these trails open for use by the citizens of our country. (63)
- Please take the “no action” alternative...The Napa Point Trail is the last good open trail in the Seeley-Swan Valley (73)

**FS Response:** Thank you for your comment.

**18. Comments in support of Alternative 2.**

- This proposal is a reasonable compromise, because other trails would remain open to motorcycles – a total of 92 miles in the entire Swan Crest. (47)
- We are asking that these trails be closed to motorized vehicles. There are so many other places people can use motorized vehicles already. It is our wish that some trails can be designated to hikers and horses only. (27)
- The Backcountry Horsemen of the Flathead...support Alternative 2 as we agree it will reduce current and future conflicts between motorized and non-motorized users. (26)
- I am lucky not to have encountered motorized vehicles in any of these places. Please prevent the ruts, mud holes, litter, weeds, pollution, and noise that vehicles have made common in other parts of the Swan. (64)
- We support this proposed action because prohibiting motorcycles on these trails will “aid in the ease of managing these roadless lands in the Southern Swan Crest” and enhance their suitability to become “Congressionally-designated wilderness.” (9, 11, 13, 14, 15, 30, 40, 42, 51, 57, 83, 84, 86, 89, 95, 97, 98)
- While we would have preferred to see such action taken as part of a larger Travel Management Planning process that included analysis of the district as a whole, we still support your efforts to protect these routes from the noise, dust, and damage caused by motorized use.

**FS Response:** Thank you for your comment.

**19. Motorized trails make areas available for elderly and others, do not close.**

- At my age it {*riding these trails*} is something I can still do and enjoy. (2)
- Something that was overlooked in the EA is the sociological importance of these motorized trails to people. Some people are not physically capable of hiking the great length of these trails or simply wish to experience them via an ATV. (41)
- This exclusion is discriminatory against people like me, who have limited knee movement. I cannot hike the distances required to see such vistas, but have the skills and abilities to safely ride a lightweight, dual-sport motorcycle over such a trail. I can cover such distances slowly, in small stretches; but non-motorized recreational use (hiking) of this trail is prohibited by my knees. Should I be excluded from National Forest Service access to this area because I’m not an athlete? (54)

- He needs a machine to go in on trails due to a back injury. He can't get in. This issue is not addressed in the past. He can't walk long distances and he needs to ride a motorcycle to access the trails. (117)

**FS Response:** Some comments expressed the concern that handicapped, mobility limited, or aging riders would be unduly impacted by the proposed closures. Motorized opportunities that will provide the opportunity to view and enjoy the Forest will still exist, however these opportunities, in this case will be reduced in order to reduce the site specific impact of the trails in question. Motorized opportunities for viewing and accessing the Forest will continue to exist on the open motorized road system on the Forest and on the open motorized trail system. About 40 miles of motorcycle trail in the same vicinity will remain open to use. As discussed in response to comment #8 the bulk of the segments can be characterized by a majority of users as difficult terrain and may require more skills. Additionally, the Forest is looking at opportunities to expand motorized use in areas more compatible to this type of use.

**20. The EA should have addressed special access routes for hunters with disabilities.**

- Seeing as how you are doing travel planning within the proposed project, the EA should have addressed special access routes for hunters with disabilities. (67)

**FS Response:** The creation of special access hunting areas is outside the scope of this project. However, no areas for the disabled hunters were affected by this proposal. The Purpose and Need for this proposal is described in the EA on page 2. The Purpose of the Bruce Creek to Alpine 7 to Napa Point Motorized Trails Project is to reduce current and future resource impacts on these trails and the adjacent areas, and to reduce the current and future conflicts between motorized and non-motorized backcountry users that result from the physical impacts discussed in other responses. In addition, closing the Bruce Creek Trail to motorcycle use would move the Flathead National Forest towards its grizzly bear security objectives within the Jungle Addition Grizzly Bear Subunit.

**21. Comment related to how data in the EA was collected.**

- The EA repeatedly states “low amounts of motorcycle and non-motorized use occur on the proposed action trails.”
  - What are the numbers?
  - How were low amounts of activity determined?
  - Were surveys done to find out?
  - If the motorized activity is truly minimal on these trails, then the affects to wildlife and conflicts with non-motorized recreationists should be minimal. (44)

**FS Response:** One comment observed that the EA discusses low amounts of motorcycle use and non-motorized use and asks what the numbers of users are and how the use level was estimated. As discussed in the EA, the source for use estimates is based on Forest Service employee observation of the use during maintenance and reconstruction activities and on user input. The Alpine 7 trail, which lies in the middle of the trail segments proposed for closure, was reconstructed during the summers of 2003 to 2007. During this time, the trail crews doing the reconstruction camped along the trail for 10 day periods of time in 3-4 hitches per year. Their observations during this time frame yield much of the user number estimates. In addition, conversations with users of the trail, including horse, foot, motorcycle and outfitted users added to the anecdotal information available about trail use numbers and types of use. No specific trail data based on trail counters or trailhead surveys was gathered.

The estimates based on these observations were that 2-4 motorcycle parties per year use the Crevice Lake to Napa Point portions of the Alpine 7 trail. Observations of trailhead parking made at the Napa Point trailhead, and anecdotal information from trail users and Forest Service employees, indicate that non-motorized users (primarily hikers and horse users with some mountain bike users) use the Napa Point trail much more frequently than the portions of the trail system further north. Use estimates for these types of use are made based on anecdotal observation of Forest employees and users. Non-motorized use ranges (during summer/fall) from 0-2 parties per day during the week to 2-10 parties a day on the weekends, with the weather being the most influential factor. Based on observation of the trail crews and user comments, non-motorized use decreases with increasing distance from the Napa Point trailhead, with less non-motorized use observed on the Alpine 7 trail north of the junction of the Napa Point and Alpine 7 trails.

Bruce Creek, based on Forest Service employee observation and discussions with users, is less used than the Napa trail, or the portions of the Alpine 7 closest to the Napa Point trail.

Within the context of the use estimates, a question was raised as to why close the trail, based on the assumption that if the motorized use levels are low, then the effects to wildlife and user conflicts should also be low. The responses to this comment are found in the responses to Comments #1 and #2. In general, the relatively low levels of use currently observed do have effects on grizzly bear security and has had site specific impact in some steep and moist areas along the trail segments. Potential for increased impact with increased use exists along these segments, and particularly increased conflict/safety issues exist along the steep sections of the Napa Point trail, which, due to access, is the portion of the trail system most used by non-motorized users.

## **22. Questions that motorized use is higher than what we disclose.**

- I don't truly buy in on the fact that some motorcycle riders only travel 5-15 miles, most of the people that I ride with wouldn't leave home to travel 5 miles in the Swan Crest trail system; 30-50 miles can easily be covered on a good day on a motorcycle. There are some questions regarding motorized users that travel these

trails every year. I can clearly guarantee that there are more than 2 – 4 bikes a year. (45)

- More than 2-4 groups per year ride these trails because last summer alone I rode that trail 6 times and there are usually 2-5 people in our group. While riding we ran into at least 4 other groups of motorized users as well. (6)
- Use estimates are way too low. At Bunker Lake last fall on a day ride, he saw 3 motorcycle groups. (116)

**FS Response:** Some comments were received that expressed disagreement with the motorcycle use estimates in the EA and with the characterization of the length of trips taken. The EA (page 16) characterized the length of trips to be taken (based on observation and user input) on being 5 to 15 or more miles (emphasis added) one way. We would agree with comment that most trips and most riders would not leave home to travel 5 miles on a motorcycle trip. In addition, the use estimate for motorized use is 2-4 parties per year. Most parties the trail crews observed were two or more riders with some parties of 6-8 being observed. This would lead to something in the range of 12 to 32 bikes using the trails per year. Again, even this is an estimate based on anecdotal observation. The use numbers are to give a relative scale of the amount of existing use.

**23. Propose an open season for motorcycle use during the dry months of August and September.**

- I proposed an open season for motorcycle use during the dry months of August and September. My motorcycle parties use these trails usually only once a year or two times at the most. We ride these routes as a loop contrary to the EA that suggests out and back riding. (50)

**FS Response:** A season of use was not included given the specific conditions and/or concerns that drove the purpose and need for the decision. For example grizzly bear security and chronically moist areas on trails that typically remain moist during these months would not be effectively addressed by a season of use as suggested.

**24. This is a good time to close these trails with little motorcycle traffic.**

- This is a good time to take this step *{closing the trails}*, as little motorcycle traffic has been observed by the Forest Service. Experience in other national forests shows that a trickle can grow into a torrent in just a few years. Once dirt bikers discover an area, it can be difficult to ban them. (47)

**FS Response:** Please note the proposed trails to be closed were not selected for the purpose of limiting motorcycle use as an end in itself, but rather for the reasons discussed in the Purpose and Need of the EA. The Purpose of the Bruce Creek to Alpine 7 to Napa Point Motorized Trails

Project is to reduce current and future resource impacts on these trails and the adjacent areas, and to reduce the current and future conflicts between motorized and non-motorized backcountry resulting from physical impacts as discussed in the EA and the Decision. In addition, closing the Bruce Creek Trail to motorcycle use would move the Flathead National Forest towards its grizzly bear security objectives within the Jungle Addition Grizzly Bear Subunit.

**25. How is this decision “balanced use” or multiple use?**

- Balanced use seems to be a fading statement for those of us who do ride the single-track trails in the Montana National Forest...The impact from the minimal use to the trails in the proposed closure district do not make sense to the future of any balanced use, nor do they guarantee a future for any use. The footprint made from the remaining single-track trails in Montana is minutely fractional and should remain open to the public for balanced use and a continued joint maintenance effort. (100)
- As a retired USFS employee, I am distressed at the demonstrated lack of commitment by the Flathead National Forest to provide reasonable, fair, and balanced multiple use access, management, and protection of our National Forest lands. (101)
- As users of the Forest, we are having more and more trails closed to ORV use. Where is "fair and balanced?" In the next mountain you have Jewel Basin already wilderness area. What does ORV have? Other than the rocky peak, (I forget the name) I have never seen a hiker on this trail. Trails for ORV are more useful when they connect and have a destination of say Spotted Bear. (105)
- The name of the game is balance and courtesy and everyone investing in keeping the trails cleared. How many hikers carry a chain saw in and clear trees? They seem to lay claim to any trail they find assuming all ORV should be banned. (105)
- These people believe that no trail on any forest should be used by alternative users. This is not balanced recreation! (50)
- What a shame it is to the multiple-use principles you are required to maintain, but that you seem so inclined to eliminate the majority of the public from being able to use OUR public lands in the FNF. (34)
- Any further trail closure violates the Forest Service's own statement of "multiple use concept." The numbers don't add up as any reasonable person can see. So why would these trails be closed? Fear of litigation from special interest groups? Personal agenda of those making the decisions? I would hope not. I would hope you would do the right thing and keep these trails open to the US public for the

recreation of their choice. Please abide by the multiple use motto that fits our free way of life. (36)

- 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 of non-motorized to motorized trails. (38)
- The non-motorized groups have their own areas to go where motorized is not allowed. It is called “Wilderness Areas.” Motorized users do not have our own area. We share. It’s called Multi-use. Alternative 2 is blatant discrimination against motorized use. The small amount of use by motorized users is not hurting anything or anybody. (4, 38)
- These trails are legal for MULTIPLE USE. Hikers are aware of this long before they take the first step and should know that running into another "user" is possible. If they can't handle the fact that others enjoy these trails as well, they should consider hiking where they are guaranteed not to run into another kind of user. Places such as Glacier National Park, Jewel Basin, and any Wilderness areas are strictly closed to any kind of mechanized user and would guarantee no conflict for them. I am nearly certain that you don't hear conflict reports from mechanized users. We are aware of the fact that we have to share these trails with others and don't feel conflicted when we do see others. (35)
- We enjoy riding our OHVs on primitive trails and roads on all of our public lands. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities. (38)
- There are thousands of miles of suitable roads for motorized recreation near this area and this historic trail should not be sacrificed in the name of “multiple-use.” (20)
- I ride that section of trail once or twice a year and have never seen any hikers or bicyclists, so there shouldn’t be a conflict of interest for users. (88)
- I personally have never encountered any motorized vehicles in that area. I have encountered motorcycles on the Broken Leg Trail (544) and also on the Patterson Trail (293) prior to the July opening...The sign at the trailhead that indicated the trail was closed to motorized vehicles was removed. (94)
- I have been riding the proposed closed trails for over 15 years on my KTM motorcycle with a small group of friends. In all of those years, I have come across "1" Forest Service work crew. That's it! I have never come across a hiker, I have never seen a mountain biker, and I have never seen anyone on a horse. These trail sections should be closed to these users to minimize future conflict so that my buddies and I don't have to feel conflicted when we come across another user on our "public" lands. (35)

- I am just so tired of trail closures, especially ones for no reason other than a small group of specific complainers that cannot learn to get along with everyone else. I, as a trail user, and trail rider, STRIVE to get along with ALL users, and I think with a little patience, tolerance, and education, all can do the same. (39)
- I do not think the solution is to close down the trail to motorized use. This is not creating balanced use. I believe creating balance use is one of the requirements of the Travel Management Plan. (4)

**FS Response:** Similar to response to Comment #13. Some people felt that the proposed action was not balanced use or was contrary to multiple use of National Forest Lands. The response to comment #13 provides a more detailed response to what factors are used to determine what uses (in this case motorcycle trail use) are appropriate on a given part of the national forest. In the view of the Forest Service, multiple use is an important principle that applies to the Forest Service system as a whole, but which in practice must be carefully applied as the resources dictate in site specific situations. While motorized trail use is an appropriate use of National Forest lands, it is not necessarily appropriate everywhere, as the use may have varying impacts on varying landscapes. Use of the National Forest for grazing, for example, is one of the many multiple uses provided for within the National Forest System. However not all Forests in the system have land suitable for grazing and/or do not have the same proportion of grazing. Similarly, motorcycle trail use does not have the same effect on each trail. The landscape containing the trails and wildlife habitat through which trails are located, varies widely. This decision is based on the site-specific effects of trail use on the specific trails in question and is consistent with the multiple use concept.

In contrast to the implications of some comments that the decision is being made primarily to respond to non-motorized user complaints; this decision is primarily being made to respond to trail specific conflicts related to terrain, soils, wildlife issues, and potential user/safety/management conflicts. There is considerable discussion in the EA about social conflicts due to types of uses because there was considerable input during scoping about such conflicts as motorized noise and its effect on non-motorized users. These issues are disclosed in the EA, but the primary reasons for the decision are the resolution of issues highly consistent with the multiple use concept.

**26. Noise is not a fair criteria to use against motorized use.**

- If someone cannot stand to hear the sound of a motorcycle coming down the trail and it is going to ruin their experience, do not go to a multi-use area, go to a Wilderness area...Motorized and non-motorized visitors come to these areas to enjoy the forest. Since noise could be a part of it, learn to deal with it, stay home, or go to the wilderness areas...If non-motorized users become negatively affected by the presence of motorcycles, then their choice is to go to a non-motorized trail. Motorized users have no choice. (4)

- On page 19, you state a visitor’s recreation experience may be affected by sound. “For example, even the faint sound of a vehicle might constitute a noise in a wilderness.” This is not a WILDERNESS area. It is a multi-use. If a person is totally against motorized use, go directly to the Wilderness areas where motorized is not allowed. (4, 38)
- Please do not let people who view noise intrusion as a violation of their experience outdoors *{prevail}*. There are so many places that they can go if they wish it to be quiet. If airplanes pass over this trail, are they going to stop air traffic too? (39)
- I have enjoyed days in the wilderness and have seen jets, planes, and helicopters all driven by internal combustion engines. Has their noise disturbed my solitude? Not once! Do I think there should be a “no-fly” zone over this area for this reason? No! This is just as absurd as some of the reasoning propelling Alternative 2. (75)

**FS Response:** Some comments stated that noise should not be a criterion for the closure of the trails. Conversely, many comments were received that indicated that the noise of motorcycles did adversely affect some non-motorized user’s experience. The issue of noise engendered many comments in preliminary scoping of this project, and the EA reflects the range of opinion we received. While respecting people’s personal perceptions of trail experiences, we agree that there are many options for non-motorized users to seek out trails where motorized use is not allowed and where noise would not be an issue to a user concerned with it. However, noise reduction is not a primary reason for the decision to close these trails to motorcycle use.

The primary purpose and need for the closures are the combination of wildlife security, and areas of steep, moist ground susceptible to erosion, where motorcycle use can disproportionately cause wildlife security and user/resource conflicts related to tread and switchback rutting. In addition, there are potential user/safety/management conflicts on portions of the more heavily used Napa Point trail where the trail is narrow and on very steep side hills and where the number of users and potential for future increased use is likely greatest due to the relative ease of trailhead access.

**27. The motorized use is so limited that it should not constitute a conflict that needs to be “resolved.”**

- I’ve ridden this trail for many years and very few times have I run into hikers. Please keep this trail open. (1)
- The area that is in the proposal is so far from any road that I have yet to see a hiker. I have seen many other motorcyclists that, like me, enjoy the area they are in. The other areas of the Alpine Trail #7 are more frequented by hikers and horseback riders who tend to have an attitude about me being there. (2)

- We ride trails 101, 82, and 82A several times per year and have NEVER witnessed a non-motorized hiker, horseman, or mountain biker on these particular trails. I have seen other motorized users... On Alpine 7 and Napa Point Trail, we have only had one unpleasant encounter... There are trails that do have a high conflict ratio between non-motorized and motorized but these particular ones do not. (6)
- I've been riding these trails for over twenty years and I have never had an incident/confrontation with another user. (45)
- I ask you keep this trail open to multiple use. The traffic of hikers or motorcycles is minimal. Due to elevations and snow, we can only access this area 6-8 weeks per year. I have seldom come across a hiker or horse, and we always use courtesy to share the trail with them. (24)
- You will have received the usual comments from anti-access advocates claiming “conflict” but the reality is very, very different. Closing motorized trails is a religion to these folks... I have been on those trails numerous times on a motorcycle and have never seen the number of hikers you refer to in the EA. (32)
- These trails are typically ridden by as few as a dozen motorcyclists a year. Surely if there were conflicts, it must be as few as one or two people who are causing conflict. Why aren't they identified and prosecuted individually, rather than closures to an entire user group? If there are no actual conflicts, merely perceived conflicts, why aren't motorized users' Purposes and Needs ever considered? (74)
- There is no conflict – just our *{motorized users}* mere presence/existence... In my time riding these remote trails I have only encountered one pair of hikers in addition to the work crew. (76)
- There have been no user conflicts (documented or not) due to motorized use. (60, 62)
- I haven't seen any evidence of trail conflicts. (103)
- In the Purpose and Need Section of the EA, it appears the goal is to reduce current and future conflicts between motorized and non-motorized users. While there are no recorded conflicts, why aren't non-motorized users discouraged from using this area? (74)
- Doesn't the “low to moderate” use by a minority of the non-motorized crowd that might “receive less-than-satisfactory recreational experiences” by being passed by a motorcycle or two for a few very short minutes, just mean that they should learn to get along and learn to play in our national forest sand box like adults or not use a dual use trail at all? Why are the non-motorized users experiences on this trail

so much more important than the motorized users experiences on this very same trail? (34)

- Under Alternative 2, the document once again takes sides with the non-motorized user because his “feeling of remoteness” is compromised. Under Alternative 2, the document places the blame on the motorized user because the non-motorized users feel like they are losing their “feeling of solitude.” (38)
- Apparently only dealing with “potential” user conflict between motorized and non-motorized users is the only issue on the radar screen of the employees of the FNF. (34)
- I do not believe you should close a trail that is currently being used by motorcycles just because there COULD be future conflicts. There will always be conflicts, both present and future, with ALL users. (39)
- The Background section of the Environmental Assessment states these trails have shown extremely limited motorcycle use. Why is this even a concern then? Just because groups like the Swan View Coalition and Wildlands CPR see it as a concern? Maybe the laws already on the books should be utilized if your future potential “user conflicts” develops. (81)
- Alternative 2 will reduce current and future conflicts between motorized and non-motorized users. (3)
- Motorcycles disrupt and displace hikers, horseback riders, skiers, and llama packers. (9, 10, 13, 14, 15, 16, 17, 19, 30, 40, 79, 84, 92, 95, 97, 98)
- Motorized vehicles have many negative impacts to the low impact users (hikers, horsepacker’s etc.) The speed at which motorcycles and other vehicles travel make their use incompatible with more traditional outdoor pursuits. (20)
- I hike the Napa Point, Alpine 7 segment at least 3 times a year and have done so for the past 15-18 years. Every year I encounter more use by motorcycles. If nothing is done now, it will only be that much more difficult to do in the future. (21)
- I have learned to appreciate the peace and quiet of the mountains. It’s annoying and disappointing to hike the Alpine Trail and be confronted by motorcyclists up there on the Swan Crest. With so many places open to motorized recreation, it seems appropriate to allow hikers and wildlife the benefit of a Swan Crest without motorcycles. (22)
- I would like the FS to explain to me how many non-motorized users would even come in contact with such a limited number of motorcycle riders on this trail in

any given year? Also, how many non-motorized users filed a written complaint with the FS due to the presence of a motorcycle rider on this trail? (34)

- To my knowledge, there are no documented problems with environmental impact or user conflict other than the most generalized statements true of every trail in the world. Please provide me with information regarding actual environmental impact of any measurable nature, or any user conflicts of any sort. (74)
- I find myself troubled this evening after learning from Dave Hurwitz that the FS response to his FOIA request indicates NO specific written user complaints from anyone using these trails and further, no written documentation of the number of users, either motorized or non-motorized, for these trails. In fact the ONLY indication of any contact between motorized and non-motorized users is apparently from some informal discussions – “Employees on the Swan Lake and Spotted Bear Ranger Districts have heard verbal concerns about encounters on these trails between motorized and non-motorized users prior to and during scoping on this specific project.” (76)
- There are no documented specific conflict reports (102)
- There are no documented specific user numbers to support your assumption of heavier non-motorized than motorized use. (102)
- The undocumented “encounters” referenced by the FS on these trails simply does not justify your proposed action. (76)
- I am AMAZED at the Forest service response to close a little used motorcycle trail because of a unconfirmed complaint by a hiker. The Alpine 7 trail is one of a kind and now you are making it a one of a kind trail to nowhere. (77)
- Some of your decisions are being based upon purely “verbal concerns” about “encounters” on these trails that employees in the Swan Lake and Spotted Bear Ranger District claim to have heard. “Encounters” on any trails accessed by motorized and non-motorized users can be very friendly or possibly unfriendly in nature. How people conduct themselves is not for the Forest Service to direct. ...Maybe part of the solution should be that the Forest Service provides educational information in preventing user conflict. (81)
- If all it takes is a few hikers to cry “User Conflict !” then all motorized use on public land is doomed, and I refuse to accept that or allow that. It is a well know tactic used by the environmentalists to get trails closed to motorized use, and many of their web sites give instructions on how to do it. Why is it that user conflict always results in closure of public land to motorized users? (29)
- Hiker use of these trails is primarily limited to daytrips – we almost never see hikers very far into these trails. (102)

- I have honestly never experienced a user conflict on any trail in Montana using any of my chosen means of access {*mountain bikes, 4X4, horseback, tele-skiing, snowmobiles, ATV, and motorcycle user*}...There are those who have. They are jerks. There are jerks who utilize motorized vehicles for access our Forests, and jerks who use non-motorized means to access the Forests...These jerks need to be ticketed and fined, not individual users groups punished based on their chosen means of access. (74)
- I object to the tone portrayed throughout the EA that every time a motorcycle passes a hiker or horseman that constitutes a conflict. I ride young horses and pull pack animals in this country. I have ridden many young horses in the backcountry and understand what it is like to have surprises on the trail with them. I am also one of the motorcycle riders that shuts my bike off when I see stock and removes my helmet as to lessen the likelihood of them spooking. I often am sensitive to hikers as well and make a point of talking to them and being neighborly shutting my bike off most times as we pass. I am not the exception. I am just a user that enjoys these areas and knows that I am sharing them with others and being courteous. The generalization of the image of the motorcycle rider traveling through the forest throwing rocks and running people and stock off the trail is less than accurate. Irresponsible users on both sides of the fence contribute to generalizations of one user group about another. (75)
- ...Protecting these routes will reduce user conflicts. (97)
- I would ask that a full analysis of the trail use be made. How is the decision of conflict made with out a full study of use and conflicts? (105)
- As stated in the Background section of the EA, you state these trails have shown extremely limited motorcycle use. The EA is flawed in the assessment that closures are based on perceived user conflicts. There are no written records of any actual user conflicts that I am aware of. The decision to close trails based on potential user conflicts is specious at best. (74, 116)
- Trails open to motorized use and areas are being closed down unjustifiably and with out proper reasoning or conflicts. It sounds like the FS has taken things into their own hands and become the law all on their own, when they see fit and for unknown reasons. (72)
- The rationale for Alternative 2 is weak and unfairly targets one user group at the expense of another. Without documented Environmental Impact or User Conflicts, this entire EA has been a waste of time and taxpayer money. The Forest Service has an obligation to manage recreation for all types of people, not just non-motorized. Managing a Forest does not mean shutting down motorized use. (74)

- “Purpose and Need” are mentioned in your documentation but in a much skewed fashion-Advantage for purpose and need for the non-motorized user and Disadvantage equal disregard of the rights of the motorized user? Where is the balance in that thought process? (81)

**FS Response:** Many comments were received that stated complaints of conflicts from non-motorized trail users should not be the a reason to close the trail and/or that the use numbers are so low that, on most of the trail system, encounters between users are so low as to be of little real conflict. User conflict in the context of this decision is not primarily related to interactions between individual parties using the trails, though based on input from scoping, this may occur to a limited extent on the trails.

The conflicts to be reduced are those primarily related to the combination of conflict with grizzly bear security and motorized use, and the conflicts created on some portions of the trail where motorcycle use can disproportionately lead to trail rutting, switch back rutting, and other physical impacts to the trail. The physical impacts can lead to both resource concerns and reduce the utility of the trail for other user groups (as when trails become deeply rutted in steep wet areas, causing braiding, or user created trails to avoid such spots).

For example, the reconstruction of the Alpine 7 trail in this area from 2003 to 2007 required relocation of several thousand feet of trail in areas where the combination of steep slopes, and moist soils, had lead to extremely deep rutting with some ruts over three feet deep. Though the trail has been relocated and additional switchbacks have been emplaced, there are significant portions of the trail where it still must cross moist meadows and where the radius of the switchbacks used must be very tight. In such areas, we feel that limiting motorcycle use will reduce the potential conflict of such use with erosion and the displacement of other users from the trail tread. Though such areas are fragile for any users, our observation has been that motorcycle use in such circumstances is disproportionately difficult to mitigate. This issue couples with the need to more closely achieve motorized route density for grizzly bear security in this area. These are the primary type of conflicts to be resolved. Actual conflict interactions between user groups on the trail have not been the primary motive for this decision.

Some comments also suggest that potential for future conflict should not be considered in our decision. The decision does look at the potential for future erosion related issues on portions of the trail, and looks at the potential for increased use over time out of the Napa Point trailhead. This type of potential problem analysis is designed to try to avoid or reduce reasonably foreseeable future conflicts. We agree that the decision should not be based primarily on the potential for increased future social conflict between different user groups. However, in this situation, there is the potential for conflicts of the type described above and it is these type of conflicts which we seek to avoid.

**28. Look at opening South Lost trail #86 to motorcycles if you want to close Napa and that would resolve the user conflict potential on Napa.**

- I have ridden these trails many times. The only place I have ever seen foot traffic is the 3.9 miles from the Napa Point parking lot to Inspiration Pass. 99% of these

hikers head into the Bob. There are lakes, meadows, and campgrounds for them to enjoy. This is no water and hardly any vegetation anywhere on the trails being discussed here...If you really wanted to cut down on the potential conflict you would close the 3.9 miles from the Napa parking lot to Inspiration Pass, and open the trail from South Lost to Inspiration Pass to motorcycles. 99% of your perceived problems would be solved. (48)

- You need to look at leaving Alpine Trail open to the junction of Trail 86 and re-open Trail 86 to complete a loop trail opportunity. This would not affect the Subunit as you are going to close Trail 31. Most non-motorized users use 31 to access the Bob. (67)

**FS Response:** One suggestion was received that, to avoid the user/safety issues along the Napa Point trail, it be closed to motorcycle use and the South Fork Lost Creek trail #86 be opened. This suggestion would allow motorcycle traffic to avoid the most heavily used portion of the trail system, which has many narrow portions on extremely steep side hills. The suggestion is a good one from the standpoint of reducing the potential for that particular conflict. However, the South Fork Lost trail is fairly long and in a grizzly bear recovery area where the security management goal is to have no net decrease in security. Even if Napa Point trail were closed, opening the South Lost trail to motorized use would result in a net reduction of grizzly bear security in this bear management unit. Additionally, many portions of this trail cross very moist areas where trail rutting would also be a difficult issue to mitigate.

**29. How have the effects of outfitted use been considered?**

- You keep saying that there is limited, seldom, and not much motorized use and you still want to close it for someone that comes and goes in a couple of hours because they are disturbing peace and quite and moving animals away from their food. What happens when these outfitters take 10 people in there and stay three to five nights? (71)

**FS Response:** A comment was received which asked why the outfitted use in the area would not be limited, when the potential for social conflict from such use is of much greater duration than the passing noise from motorcycle users. As discussed in the response to Comments #25, 26, and 27, the proposal to close these trails is not primarily to resolve social conflicts in users having to share the trail. As discussed above, based on public input, negative social interactions on these specific trails have been very limited. Though comments pro and con about noise were the most numerous type of comment we received, the issues to be resolved by this decision are, as discussed above, largely environmental and/or physical in nature. The primary basis for the decision is the resolution of those conflicts. The outfitted use that occurs on the trail is non-motorized and its continuation would be consistent with grizzly bear security guidelines.

**30. Stock user has a safety issue with meeting motorcycles on the trail.**

- I am a member of the Backcountry Horseman of the Flathead and in using these trails with stock I have a real problem in regards to safety in stock meeting a motorized machine on narrow and blind sections of trail. Most horses will panic badly and can cause injury to the rider. (25, 27)

**FS Response:** Thank you for your comment related to safety consideration to stock users. Safety of any user is discussed in response to comment #1, especially related to steepness of terrain. Additional safety discussion is included in the Decision.

**31. Napa Point Trail is a dangerous area for motorcycles to meet people on the trail.**

- Napa point trail is in a dangerous area for motorcycles to meet people on the trail. Motorized traffic is dangerous to drive on the trail. (111)

**FS Response:** Thank you for your comment. Safety is a consideration in this Decision, for consideration on Napa Point Trail, see response to comment #30 above. There is additional discussion in the Decision Notice.

**32. Fundamental question about what are the environmental impacts and/or use conflicts we are trying to address. What documentation is there of environmental damage.**

- I am curious about what environmental impacts and or “user conflicts” are documented to justify the proposed closure. (81)
- There is no basis in closing these trails. There is no documented environmental damage and no documented user conflict issues. There are no specific impacts listed in the proposed closure that relate negatively to current motorcycle use. (52, 53, 54, 55, 58, 62)

**FS Response:** Answer contained in response to comments #1, 2, 25, and 26, and in the EA and included in the Decision document.

**33. How do we define conflict?**

- Under your "specific concerns" section of the assessment, you list "use conflict" as a negative impact from motorized access. What, specifically, does this mean? I am inferring that other users DO NOT want to share the trail with motorized vehicles (motorcycles). Can you provide any specific reference to incidents where the trail way was blocked by motorcycles or to incidents where hikers could not safely share the trail with them? (54)

**FS Response:** One question received was how we define “use conflict”. In terms of issues that drive the purpose and need for the decision, the use conflicts we seek to resolve are those as defined in the purpose and need section of the decision. The types of conflicts we are trying to resolve are also discussed in the response to many comments, but particularly the responses to comments #1, 2, 25, 26, and 27, provide further clarification and the rationale included in the Decision pages 9 -12. Social conflicts or differences of opinion between users groups are noted and discussed in the EA, but are not the primary drivers behind this decision. Complaints between user groups from specific encounters along these trail systems are not frequent, though some responses to this decision describe noise and trail rutting as conflicts.

**34. There is no documented basis of the trail impacts.**

- If there is any measurable amount of physical conflict, it would seem to be caused by overall traffic and OVERUSE of the trail - NOT by the presence of motorcycles...If there were any physical barriers caused by wheeled vehicles on the trail, why wouldn't bicycles be included in that concern? This listed concern smells discriminatory in the way it was presented, and has no documented base of facts listed in your assessment. (54)

**FS Response:** Please refer to response to comments #1 and 13.

**35. Won't the project displace use and cause more problems on other trails?**

- The limited amount of current motorcycle use of the Proposed Action trails displaced onto the remaining forty miles of motorized trails in the Southern Swan Crest areas would...increase wear on the remaining trails open to motorized use. (4)
- This project will close the last remaining motorized loop trails in the area, forcing all motorized users to backtrack, creating more use on the same trails, creating more impacts to the trails... This plan will have a negative impact on the remaining motorized trails from more required maintenance to more congestion possibly creating safety problems. (67)
- Expert riders seek areas where they can challenge their ability and their equipment without burdening other users. If all "Expert" terrain is closed, you may find increased user conflicts on more "Beginner" or "Intermediate" trails. (74)
- Putting motorized restriction on this trail system as proposed in Alternative 2 will only cause more activity to be placed on other areas of the National Forests. We urge you not to restrict motorized use on these trails and work to provide more opportunities for motorized access to Forest Service lands. (41)

- Closing more trails to motorized use has negative impacts to private landowners. F.H. Stoltze Co. has seen a large increase in the amount of motorized recreation on our land in recent years. This is largely due in part to the limited access to National Forest land in area. (41)
- The amount of trail closures to motorcycle use over the years will cause a problem with dispersed recreation forcing us users into less trails open and crowded conditions with more complaints. (85)
- I ride most all of the trails open on the Flathead and we could already use more trails open. (50)
- The more trails we lose, the more concentrated it gets where it is open. (85)
- If too many area are shut down then everyone will have to use just a few, which will overpopulate them, which in the long run will cause more damage. (99)
- The limited amount of current motorcycle use of the Proposed Action trails displaced onto the remaining forty miles of motorized trails in the Southern Swan Crest areas would cause an increase in noise impacts to the non-motorized users on these trails. (4)
- This trail system should remain open to motorized vehicle use. Closing these trails will create more problems both on National Forest and private lands. The closure of these trails to motorized use will cause:
  - Increased off-road use and pressure on other areas of National Forest land.
  - Increased motorized use on private and state lands.
  - More illegal motorized recreation.
  - More vandalism to Forest Service property.
  - Many sociological deprivations to motorized recreationists. (44)
- Closing these trails results in increased impact on other nearby FS trails by forcing more riders unto fewer and more heavily used trails thereby actually INCREASING environmental and wildlife impact and increasing the likelihood of user conflict. (102)
- He rides Columbia Mountain Trail, only thing left, it is all he has. This concentrates impacts on the existing motorcycle trails...Future options are to ride illegally; ride with more conflicts (too many motorcycles, more erosion, because everything else is closed); ride the heck out of what is available, and then the FS closes those trails. (113)

**FS Response:** Some comments were received that closing these trails to motorcycle use would merely displace the use onto nearby trails open to motorized use causing more erosion. The trails that remain open to motorized use do not have the same combination of wet steep areas

with erosive soils to the extent that as is observed on the trails to be closed. For this reason, it is not anticipated that displaced use would cause unacceptable impacts. The forest is also planning to conduct environmental analysis on other areas of the forest to potentially increase the motorized trails system in areas with fewer potential resource conflicts. We did acknowledge in the EA that there could be an increase in use on the other motorized trails on pages #21, 23, and 24. The use level that could occur is not expected to create resource concerns.

**36. Motorcycles cannot be heard or smelled unless a person is within a few feet of the motorcycle.**

- As far as non-motorized users being affected for 10-20 minutes (by exhaust and noise) after we pass them is untrue. Motorcycles are much cleaner and much quieter than they used to be and with the wind, deep valleys, and thick forests you cannot hear anything unless standing within feet of a running motorcycle and what little exhaust smell there is dissipates rapidly. (6)
- Stating that you can hear a motorcycle for 20 miles is completely ridiculous. Do folks in Kalispell hear the roar of 30+ motorcycles leaving the starting line at Hungry Horse Motocross Track? ...Smelling a motorcycle for 10 – 20 minutes? A completely ridiculous statement (45)

**FS Response:** Noise and fumes were not primary issues that drove the action, but based on comments, were considered in the analysis in the EA. See response to Comments #26 and 27. The Bruce Creek, Alpine 7, and Napa Point trails have most of their setting located above treeline and on open ridgetops. In this open area, the sound carries more than in dense tree canopies. The impact of sounds would vary by individual. Some people might hear motorcycles as background noise in the distance and it might not affect their experience. Other visitors might hear motorcycle engines in these open ridges for 10 to 20 minutes before the motorcycles actually arrive at that users location, and then continue to hear it as the motorcycle leaves. In some of the thicker forests on the lower portions of the Bruce Creek Trail, the sounds would not carry as far. On page 20 of the EA it notes that noise could be heard for 10-20 minutes, not for 20 miles.

**37. The 96 decibel sound requirement for motorcycles is not very loud.**

- The new sound requirement of 96 decibels for the mufflers is no more than a shout by a human on a mountain bike. (50)

**FS Response:** Noise was a consideration, but did not drive the Proposed Action and analysis. The 2007 Montana Code Annotated 61-9-418 requires that a motorcycle may be operated off of a highway on public lands only if the motorcycle's noise emissions do not exceed 96 decibels.

90 decibels are as noisy as a busy urban street, a diesel truck or a food blender. It can cause serious hearing damage over 8 hours. 100 decibels are as noisy as a jet taking off 1,000 feet

away, an outboard motor, a power lawn mower, or a jackhammer. It can cause serious hearing damage over 8 hours. (Temple University Department of Civil/Environmental Engineering)

Sound becomes unwelcome noise to people who do not like or want to hear motorized noise. To a motorcycle rider, the sound that other motorcycles make is typically not heard because of the sound that their own motorcycle makes, and if they can hear it, it does not negatively affect their experience because it is an acceptable sound. For at least some of the non-motorized users, the sound of motorcycles in the distance or up close may not be an acceptable sound, and becomes a noise that can be intrusive and provoke negative reactions, at 96, 90, or 100 decibels.

**38. The Forest Plan says the forest should provide an array of recreation opportunities on the forest. This project does not provide for the motorcycle experience.**

- You state the Flathead National Forest seeks to provide a full array of recreation opportunities. The ROS provides a framework for defining the types of outdoor recreation opportunities the public might desire. You identify the three trails in the Proposed Action as located in a Semi-Primitive Motorized Area; a semi-primitive area that has the opportunity to use motorcycles. Then you turn right around and do just the opposite. (4, 38)
- The trails are designated as semi-primitive allowing some motorized use. This was a thought out process in the past to include some degree of motorized travel. Why label it if it is going to be managed as wilderness anyway. (113)
- The EA states: use the Recreation Opportunity Spectrum as a guide to provide the full array of recreation opportunities on the Forest...Motorized recreation is encompassed in the “full array of recreation opportunities.” Cutting a THIRD of the motorized trails in the Southern Swan Crest area is not providing an array of recreational opportunities. (44, 67)
- On page 17, under “Trail Experience,” it is stated the Flathead National Forest seeks to provide a full array of recreation opportunities. Expert motorized opportunities are also within this array, and this trail system is ideally suited to expert riders due to its low overall usage, which benefits low risk of user conflict and low risk of environmental impact. (74, 81)
- The EA states: Encourage Forest visitors not desiring a wilderness setting to use non-wilderness National Forest System lands which can provide for recreational needs...These areas are NOT designated wilderness and should not be treated as such. There are plenty of areas in the vicinity of these trails that are designated wilderness and people wishing for a wilderness setting can go to them. Closing this trail to motorized use is not encouraging visitors to use “non-wilderness National Forest System lands. (44)

- The EA states “Use the ROS as a guide to provide the full array of recreation opportunities on the forest.” “Encourage Forest visitors not desiring a wilderness setting to use non-wilderness National Forest System lands which can provide for recreation needs.” This plan does not follow the above direction. (67)

**FS Response:** As described in the EA (pg 17 & 18), the Flathead National Forest does seek to provide a full array of recreation opportunities. As described, the Recreation Opportunity Spectrum is a classification description so that users know what opportunities and experiences they may have in certain areas. The ROS description in conjunction with Forest Plan directive for Management Area 2B set the stage for consideration of the action alternative. Semi-primitive Motorized Area does allow for motorized uses (i.e.: chainsaw vs. hand tools, motorized access) and the specifics in the management area description include that some **trails** in this management area could be managed for non-motorized use.

This action alternative is not recommending wilderness designation, nor is it eliminating the array of recreational opportunities as motorized trails are available in portions of the Swan Crest. The EA does acknowledge that this action alternative does eliminate some of the current motorized trail options. As discussed in the Purpose and Need in the EA, the Decision is based primarily on the site-specific trail characteristics and settings for the particular trails involved. The Purpose of the Bruce Creek to Alpine 7 to Napa Point Motorized Trails Project is to reduce current and future resource impacts and conflicts on these trails as described in more detail in the EA and in the Decision.

**39. These restrictions will preserve the wilderness character of these roadless lands.**

- The Swan Front Roadless Area should be high on the list for future wilderness recommendations, because it is logically part of the Bob Marshall Wilderness complex. (49, 57)
- While hundreds and hundreds of miles of roads exist in the Flathead Valley, the northern Swan Range represents the best and closest wilderness experience for most Flathead Valley residents. (108)
- These restrictions will...preserve the wilderness character of these roadless lands. (90)
- We are discussing an area that could still qualify for designation as official wilderness. That should be the goal and stopping the many negative impacts of motorization is an essential first step in that direction. We don't need more routes for motorized travel but we do need more land protected as wilderness. Such a small percentage of land still exists as potential wilderness while such a huge percentage of land is already available to motorized vehicles. (91)

- More and more people are populating the Flathead Valley with the wilderness experience in mind; if we don't start now to protect the Swan Crest and other areas like this, it may be too late for others to enjoy. (96)
- We want to commend you for your proposed action. While it does not go as far as we might like in terms of restoring the wilderness quality of the landscape enacted as wilderness by Congress in 1992, it does make progress towards protecting wildlife and human-powered, wilderness recreational experiences in portions of this landscape (108)
- Under “Cumulative Effects,” you state that closing the trails to motorcycles would enhance the suitability of this portion of the IRA to become unroaded backcountry or congressionally designated wilderness. This is arbitrary and capricious. There is enough Wilderness. (4, 38)
- There are plenty of non-motorized trails in the FNF and very few dual use trails that actually allow motorcycles. And let's not forget the thousands of acres and hundreds of miles of trails found in designated wilderness areas in this forest where only non-motorized use is allowed. Can't these few greedy and easily annoyed non-motorized users you reference in this EA just go to the wilderness if their entire trip to FNF will be ruined by a few minutes presence by a motorcycle rider? (34)
- The whole purpose of these closures is stated in the last sentence of the first paragraph on page 31. {“Closing the Proposed Action trails to motorcycle use would enhance the suitability of this portion of the IRA to become unroaded backcountry or congressionally designated wilderness.”}Congress can designate any area it wants, any time it wants. ...It is obvious that your desired condition is to have these lands designated as Wilderness. Even if Congress doesn't act, it is your intention to manage them as if they are. (48)
- The proposed trail closure is simply another step in implementing the documented wilderness agenda. (101)
- The EA does not mention any closures for this {*Inventoried Roadless*} reasons, but it seems funny that all of the closures are lined to these areas. You are creating defacto Wilderness. There is no law or regulation that says you cannot allow motorized use in these areas. I am requesting that you allow the current motorized use to continue. The 2001 Roadless Rule does not close or block access to any of the 386,000 miles of roads currently in the NFS. The rule merely prohibits the construction of new roads and the reconstruction of existing roads in inventoried roadless area; it does not affect trails. You have not presented any documentation to prove that continued use has or will cause irreparable damage so as to preclude them from becoming designated wilderness. (67)

- I am requesting that you allow the current motorized use to continue... You have not presented any documentation to prove that continued use has or will cause irreparable damage so as to preclude *{this area}* from becoming designated wilderness. (67)
- The data you supplied leaves one with the conclusion that the real reason for the proposed closures are perceived social issues by the non-motorized users and the Forest Service's agenda to create Wilderness. Certain user groups will let you use our public land only under their set conditions. (67)
- On page 9, you state that Alternative 2 would "meet the Purpose and Need of the project by separating motorized and non-motorized users." This is NOT A WILDERNESS area. Motorized use is allowed in the National Forest. Your extreme bias towards non-motorized use is evident throughout this entire document. (4, 38)
- Some people would like to expand the Wilderness to the north. The Forest Service cannot make Wilderness, but you are treating it like wilderness. (116)
- There is no law that authorizes the USFS to eliminate historic uses in order to "enhance the suitability of the area for wilderness." This statement in your planning records proves the arbitrary bias and illegality of your proposal. (101)

**FS Response:** As described in the EA (pg 25) the majority of the trail included in the action alternative is within the Inventoried Roadless Area, the exception is the trailhead on Bruce Creek and a portion of the Bruce Creek trail. This analysis and description is included in the EA, as we are required to describe the affected environment for Inventoried Roadless Area.

To complete the needed and required analysis for these areas we describe Natural Integrity, apparent Naturalness, Remoteness, Solitude, Special Features and Manageability and Features.

As noted by the spectrum of comments relative to wilderness and the wilderness character (factors denoted as described) some parties propose more wilderness including areas of the Swan Front and Swan Crest and others prefer no additional lands be added to designated wilderness, especially the Swan Front and Swan Crest.

Under the current Forest Plan, this area is not recommended for wilderness. The EA does describe the roadless/wilderness character of this area.

**40. There is no evidence in the EA that justifies the need for this closure to implement the Yellowstone to Yukon wilderness plan.**

- There is no real evidence of any kind in the EA that justifies the need for this closure other than to appease the wilderness lobbyists who are paid to gin up "user conflicts", and promote projects such as this to incrementally and

cumulatively implement the Yellowstone to Yukon wilderness plan even if there is no Congressional mandate for it. (101)

- The primary justification for the need for the closures is that the Forest Service heard from several people that there is a "need for more solitude" in the area. Everyone knows that those objections were likely promoted by paid preservation lobbyists whose job it is to oppose any motorized access anywhere in the areas coveted by the Yellowstone to Yukon for more wilderness. (101)

**FS Response:** The Yellowstone to Yukon wilderness plan is not related to this project, it is not part of the reasonably foreseeable action analyzed, nor part of the purpose and need of the project. Please also refer to response to comment #27. As described in the Decision and in many of the responses to comment, this decision is site specific to resolve those issues extensively discussed in the "Purpose and Need", and "Rationale for the Decision" portions of the Decision Notice. Other actions, such as those referred to in the comments above, are beyond the scope and the intent of this decision.

**41. Prohibiting motorcycles on these trails will increase habitat security for grizzly bear, reconnecting three fragmented segments of essential security core habitat.**

- Prohibiting motorcycles on these trails will increase habitat security for grizzly bear, reconnecting three fragmented segments of essential security core habitat. (3, 9, 11, 13, 14, 15, 26, 30, 40, 49, 57, 83, 84, 86, 87, 89, 95, 96, 97, 98)
- The motorcycle trails cut 2 sections of swan crest in half. Closing these trails would make a great grizzly bear area and unite 2 areas. (111)

**FS Response:** This is described on page 33 of the EA. The location of trails is an important factor in assessing the resulting security for grizzly bears.

**42. The grizzly bear is less prone to use these areas due to noise from these machines.**

- The grizzly bear is less prone to use these areas due to noise from these machines. (25)

**FS Response:** Motorized use and the noise associated with this use are factors included in overall motorized effects to grizzly bear subunit security.

**43. If your intent is to protect the grizzly, then you must consider closing these trails to all traffic, foot, horse, as well as motorized, and outfitter use.**

- If your intent is to protect the grizzly, then you must consider closing these trails to all traffic, foot, horse, as well as motorized. If a bear becomes a pest to hikers, it is drugged and moved to another area. If a bear attacks or kills a hiker, it is itself killed. There are several bear-hiker incidences every year, but rarely are motorized users attacked or bothered. It would seem that the presence of hikers, of which you are encouraging, is more damaging to the bear population than motorcycles or ATVs. (29)
- If the FS is really after grizzly bear impacts, limit the outfitters. Their use has an order of magnitude of environmental impact more than sporadic motorcycle use...The vast majority are not overnight motorcycle users. They do not cause scent from human food. Motorcycles might damage through trail erosion and noise, but the lasting human impact is from overnight, non-motorized use, with dinners cooking, use of toilets. Why does FS conclude the solution is to get rid of motorcycles? (113)
- Hikers, horseback riders, and bicyclists all pose an equal physical impact to the "bear habitat" of that region. (54)

**FS Response:** Grizzly bear habitat security is directly related to the amount of motorized use, and high use, roads or trails within grizzly bear recovery areas. All types of use have not been found by research to equally affect grizzly bear habitat and the Flathead Forest Plan includes habitat objectives intended to differentiate the impact of motorized and non-motorized uses. Beyond limiting the ease of access to grizzly habitat, the mitigation of the impact of human use (such as that related to overnight use, camping, etc.) as it directly impacts individual bears, is primarily addressed through food storage, rather than the prohibition of all human use. It is acknowledged that all forest visitors need to correctly store and use attractants, and dispose of human waste properly. Elimination or limiting overnight use by outfitters or the general public in this area is beyond the scope of this project and the current use in that regard is consistent with our Forest Plan. The Forest Plan direction as it relates to motorized access and grizzly bears is described on page 33 of the EA.

The statement that the Forest has several bear-hiker or bear-other party attacks annually is incorrect and we have record of very few such incidents over a long period of time. There have been a few highly publicized grizzly/human incidents in Glacier National Park in recent years. It may be that these incidents have lead to this perception on the National Forest, but we have had relatively few such incidents through the years.

**44. Effects to grizzly bears do not warrant trail closures.**

- The EA states (p.9) “If current low levels of trail use increase, habitat quality may decrease for bears.” It also states, “No change is expected for the gray wolf unless motorized use increases in the future and leads to increased disturbance to ungulates.” Both of these statements demonstrate that grizzly bears and other

wildlife are not the reason for closing these trails to motorized use. According to the Forest Service these trails get very little motorized use. (44)

- Only two subunits do not meet A19 objectives and the remaining four meet or exceed objectives. The trail closures proposed on the trails in any of the subunits is not warranted for the reasons given in the proposal. None of the data supplied provided any current studies to justify any closures due to motorized use interfering with grizzly survival or growth. (67)
- Actual impact on Grizzly bears from the limited amount of motorized activity on these trails can only be described as insignificant. (81)
- The satellite monitoring of grizzly bears in the Swan that shows bears choose and use areas with high road densities and open motorized use instead of "roadless protected areas." State-of-the-art monitoring disproves the preservationist' dogma that mere presence of motorized use harms grizzlies. Motorized recreation does not "harm" grizzly bears or any other wildlife any more than hikers do. (101)
- If the bears are repopulating with the amount of trails and roads that are still open, why close more? (88, 100)
- If bear numbers are increasing and *{they are}* close to de-listing, then the current use must not be harming the bears. (67, 120)
- The grizzly bear DNA study says there are many more grizzly bears than were thought. Bears are not afraid of motorcycles. Don't close the trails. (116)
- Look at the numbers of griz and wolves; are they above targeted numbers? If so, take them out of this picture. (71)
- Wilderness areas provide the security for grizzly bears and they shouldn't need more security area. (121)

**FS Response:** Amendment 19 incorporated into the Forest Plan includes management direction relevant to the Bruce Creek project, See page 33 of the EA. This direction includes restricting the amount of motorized access including use of motorized trails whether it is high or low use.

This action does make improvements to grizzly bear security in terms of Amendment 19. The improved security to grizzly bears in combination with trail conditions, safety, and user conflicts were also very important in developing the purpose and need, proposed action, and the decision.

The grizzly bear numbers reflected in recent DNA studies do appear to reflect a larger total population than was earlier projected. The actual trend of that population is still being studied and it will take some time for solid data to be collected in that regard.

**45. The wolf has been delisted from the Endangered Species Act and should not require any changes to protect it.**

- The fact that the wolf has been de-listed requires no change in use in the area at this time. (67)

**FS Response:** During the course of scoping to the issuance of the decision for this project, the wolf was delisted, relisted, and is currently de-listed in Montana. We considered effects to wolves, and neither Alternative 1 or Alternative 2 were thought to have significant effects, though Alternative 2 was thought to have some limited benefit as described in the EA (pages 40-44). Impacts to wolves were not found to be a driving consideration for selection of either alternative.

**46. There is no reason to make changes in current use to benefit the lynx.**

- There is no reason to change the current use for lynx *{according to the EA}*. (67)

**FS Response:** Reductions in motorized route density was determined to be beneficial overall to wildlife and reduced disturbance can be considered good for lynx (as described in the EA pages 44 -46). Implementation of the Bruce Creek project was given a No Affect ESA determination and would not result in the destruction or adverse modification of designated critical habitat for Canada lynx nor its constituent elements. We have also determined that the proposed project would have NO AFFECT on designated lynx critical habitat. Though the decision would have some limited positive effect on lynx habitat, impacts to lynx were not found to be a driving consideration for either alternative.

**47. Ungulates and other wildlife do not appear/seem to be stressed/disturbed by encounters with motorcycle riders.**

- We ride trails 101,82, and 82A several times per year and have...seen some wildlife in which the wildlife did not seem stressed or harmed by our encounter in fact they just grazed and ignored us. (6)
- There is no conflict with wildlife. I have ridden these trails for some time and had no conflict. I don't believe anyone can comment on the physical or psychological condition or a deer when encountering a motorcycle anyway. If there is an encounter these animals stare at us while we turn off our bikes and let them go on their merry way. (36)

**FS Response:** Wildlife responses to human disturbance depend on many factors, including but not limited to; the nature and extent of the disturbance, the nature and extent of human use of the area, the number of humans encountered (at one time, or over a period of time), the species of the affected animal, the natural history (including home range size) of the animal, time of year, gender and age, and (for some species) even the time of day. For many species, habituation to humans may occur so that short term disruptions pose little to no risk, whereas for other species,

smaller amounts of disturbance may be significant. Studies of physiological responses to disturbance have found that for some species, “apparent tolerance may be misleading” (Canfield et al, 1999: 6.10).

Several summaries of research pertaining to physiological responses of wildlife to recreation are available on-line, including “Effects of recreation on Rocky Mountain wildlife: A Review for Montana,” published by the Montana Chapter of the Wildlife Society in 1999 (referenced in the EA) and a recently released USFS Technical Report (RMRS-GTR-79-volume 5), “Understanding and Managing Backcountry Recreation Impacts on Terrestrial Wildlife: An Annotated Reading List”. Both are useful references for locating research regarding specific species, but many other summaries and annotated bibliographies are available as well. Many authors cited in these publications assert that visual observations of an animals’ apparent reaction to disturbance are often not enough to assess the short and long-term costs to an individual animal as a result of human disturbance.

**48. Motorized trail use seems to cause lesser disturbance to wildlife than non-motorized trail use.**

- Mountain bikers and horse users...can encounter wildlife in far more places *{than motorcycle riders}*. My opinion is an encounter with wildlife on a mountain bike or a horse or hiking is not much different than with a motorcycle. The difference I see is the mountain biker and hiker can have a surprise encounter with wildlife and many of these folks carry guns instead of bear spray. The motorcycle users give fair warning to wildlife. (50)
- There is some research on the effect of motorized conflict with deer and elk and humans on foot with deer and elk and I believe that study proved that deer and elk move away further from human on foot because they know them as a predator. (71, 72).
- When motorcycles ride through a herd of elk, they stand there only 50’ away. When we get off their bikes, the elk took off – humans on motorcycles don’t bother elk. (116)

**FS Response:** The effects analysis did not necessarily intend to compare the magnitude of responses of wildlife to different kinds of recreation. These comparisons have been addressed by multiple studies, but the conclusions vary widely from species to species, and in some cases vary for the same species under different circumstances. Our Direct and Indirect Effects analyses focused on the effects of motorcycle use, since that was the only type of trail use this project proposed to change. As mentioned in the applicable Cumulative Effects sections in the EA (page 39 for grizzly bears and page 43 for wolves), non-motorized trail use also has the potential to disturb or otherwise negatively impact wildlife. The degree of impacts to wildlife from motorized use varies based on many factors, as discussed in our response to comment #47, above.

**49. Further restrictions to motorized travel and/or other human activities are not needed for wildlife.**

- When the Forest Service cannot justify motorized closures, wildlife, from elk to wolverine to lynx, issues become the catch-all to justify the closures. You have not supplied any studies or data that require further closures for wildlife...all populations of these species are above the 1986 projections or have stable populations. (67)
- The animals will be fine with any kind of human activity in their area. We all try to blame it on some thing and there is still plenty of room for all species and types of recreation. (71)
- {According to your EA} there is no reason to change the current use because of wolves, lynx, ungulates, or for botany, heritage, fisheries, or soils/hydrology reasons. (4, 38, 67)

**FS Response:** The wildlife analysis contained in the EA (pages 31-48) describes expected and/or potential benefits (of multiple types and scales, depending on the species) for grizzly bears, ungulates, wolverines, and wolves, although potential benefits are not limited to these species. Multiple wildlife species would likely benefit from the proposed project through increased habitat security. The most quantifiable increase would be for grizzly bears, as measured by changes in access densities in all subunits (EA p. 38). Maintaining habitat values (including habitat security) is an important aspect of maintaining stable wildlife populations. Habitat security in general (and particularly in backcountry areas) becomes increasingly important as human use of landscapes closer to roads and communities increases. However, the anticipated benefits to wildlife other than grizzly bears, was not a significant driver in preferring Alternative 2 over the no action alternative (Alternative 1).

**50. How can you say that motorized use pushes game away from trails?**

- How many deer and elk are shot from vehicles every year in Montana? How can you say that motorized use pushes game that far away? (71)

**FS Response:** The effects analysis for this project did not seek to estimate how far from trails elk and deer would be disturbed, nor how far they would be displaced. The most likely impact of motorized trail use to deer and elk in this analysis area was estimated to be short-term, small-scale potential for disturbance near important high elevation habitat features that may be limiting during summer months (see page 41 of the EA). It was concluded that ungulate numbers (as well as ungulate availability to wolves as prey) are not likely to be altered by this project, due to relatively high forage availability in the analysis area. The changes in ungulate habitat use expected as a result of this project are described/summarized in the EA on pages 41 (Affected Environment section for wolves), 42 (Direct and Indirect Affects section for wolves), 44 (Cumulative Effects section for wolves) and 48 (Potential Impacts to Management Indicator

Species). Motorized use could be expected to have greater impacts to deer and elk in areas where summer habitat availability is less widely available, and/or where habitat security in general is a greater concern for deer and elk than was found to be the case in this analysis area.

**51. Wildlife would benefit from the proposed action.**

- Prohibiting motorcycles on these trails will increase habitat security for deer, elk, and other wildlife. (9, 10, 11, 13, 14, 15, 16, 17, 19, 20, 30, 31, 40, 49, 57, 83, 84, 86, 89, 92, 95, 96, 97, 98, 104)
- These *{negative}* effects are just the experience of us humans, who are accustomed to a world of machines. I can only imagine how much more exponentially shocking this is on the sensitive local wildlife that makes their homes and raises their young on and around the Swan Crest. (22)
- The entire Swan Crest is valuable wildlife habitat for those of us who enjoy hunting and fishing in the solitude of the backcountry. The Swan Crest provides important opportunity to pursue high-quality mule deer and Mountain goat as well as some opportunity for black bear, elk, and other species. It is also important for wildlife we value, but don't harvest, such as wolverine and grizzly bear. (80)
- As the Flathead Valley grows and develops, it's increasingly important to protect habitat security on our public land if we are to maintain our outdoor traditions over the long haul. The decision to make the Bruce Ridge and Napa Point trails non-motorized will help toward that objective. (80)

**FS Response:** We agree that habitat security for deer, elk, grizzly bears, and other wildlife will increase with implementation of the proposed action. Potential benefits to wildlife are discussed in our response to comment #49, above, and throughout the Wildlife section of the EA (pages 31-48). Though some degree of benefit to other wildlife species are noted, the issues to be resolved within the purpose and need are the benefits to grizzly bear security.

**52. The negative impacts of motorized trails and roads on wildlife and their habitat is well documented.**

- The negative impacts of motorized trails and roads on wildlife and their habitat is well documented. (91)

**FS Response:** It should be noted that the degree of impacts from motorized disturbance often differ among species and/or circumstances (including amount/type of motorized use and overall habitat availability/quality) and are not uniformly agreed upon in the literature. However, many studies (both experimental and observational) have demonstrated relationships between motorized use and disturbance, displacement, and other negative impacts to wildlife.

**53. These trails do not currently receive a lot of motorized use, and prohibiting such use will ensure that into the future wildlife, water quality, fish habitat, and sensitive alpine areas are protected.**

- While these trails do not currently receive a lot of motorized use, prohibiting such use will ensure that into the future wildlife, water quality, fish habitat, and sensitive alpine areas are protected. (90)

**FS Response:** As it relates to grizzly bear habitat security, we reached similar conclusions through our analysis.

**54. Maintaining peaceful, serene places is important to wildlife and people.**

- Maintaining peaceful, serene places is important to wildlife, and many people cherish going to these places. (104)

**FS Response:** Thank you for your comment. The Flathead National Forest is managed to provide for a variety of conditions for wildlife and people.

**55. Further wildlife security needs by deconstructing and renaturalizing the upper ends of Quintonkon and Wheeler Creek Roads.**

- Please further wildlife security needs by deconstructing and renaturalizing the upper ends of Quintonkon and Wheeler Creek Roads. (86)

**FS Response:** These activities were beyond the scope and purpose of the proposed project.

**56. Permit but do not encourage motorized use of trails. This would meet the Management Area standard of not providing or encouraging use on all trails in this MA. This is extremely biased and prejudiced against motorized users.**

- On page 24, you state under the “Regulatory Framework and consistency: “MA 2B...Permit but do not encourage motorized use of trails. This would meet the MA standard of not providing or encouraging use on all trails in this MA.” This is extremely biased and prejudiced against motorized users. On page 30, under direct and Indirect Effects: under Alternative 2, you are once again taking sides with the non-motorized users because his “feeling of remoteness” is compromised. Under Alternative 2, you are placing the blame on the motorized user because the non-motorized user is losing their “feeling of solitude.” (4, 38)

**FS Response:** This comment is similar to the comment we addressed under response to comment #13. In that response, we mentioned management of trail systems is largely determined

by vegetative, terrain, soils, wildlife, and Wilderness factors. The proportion of motorized to non-motorized trails results from this mix of issues. The specific examples cited in the environmental assessment, though perceived by the commenter as the EA's bias against motorized use, were intended to reflect particular concerns raised by some non-motorized users in regard to their perceptions of trail experiences. The topic of user experiences and perceptions was a subject area we received numerous and extensive comments about, both from motorized and non-motorized users. To the extent that we received such comments, the EA does discuss the issue and does try to present both perspectives. However, as discussed in the Decision and in many of the previous responses to comment, the resolution of the social aspect of conflicts on these particular trails was not the focus of our purpose and need.

**57. There are conflicting statements in the EA about the amounts of use on these trails.**

- Interesting and conflicting statements in the EA...Your EA goes from “the most popular hiking trails in the Southern Swan Crest area,” {EA page 2} to “non-motorized use is relatively high,” {EA page 7} all the way down to “use of these trails by non-motorized users is low to moderate.” {EA page 21} So which is it? Sounds to me like the FS doesn't really know. (34)

**FS Response:** If one reads the entire sentence for each of the pages provided in the comment above, the common thread is that motorized use is considered low on the trails within the Southern Swan Crest project area. Within the same area, relative to non-motorized uses, the overall use is low to moderate with the Napa Point Trail #31 and the portion of the Alpine Trail #7 closest to the Napa point Trail, being the most popular of all the hiking trails in the Southern Swan Crest area. The description is relative to the other trails available to hike in the project area. The Southern Swan Crest has about 109 miles of trails. Within that area, the most popular trails for hiking are the Napa Point Trail #31 and the portion of Alpine 7 trail that adjoins it. Elsewhere on the Southern Swan Crest, both motorized and non-motorized use, based on our observations, is relatively low.

**58. There is nothing wrong with the existing trail condition except that they do not meet all of the needs of motorized recreationists, do not provide equal opportunity which is defined as a 50/50 sharing of motorized to non-motorized trails, and does not adequately address the growing needs of motorized recreationists.**

- There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity which is defined as a 50/50 sharing of motorized to non-motorized trails, and does not adequately address the growing needs of motorized recreationists. The evaluation and proposal must adequately address these three issues and the predisposition to motorized closures must be avoided. (38)

**FS Response:** The concerns and issues raised in this comment have been responded to in comments #11 and 13.

**59. If we ride trails all the time, we are abusing the land. If we don't ride it enough, then by all means shut it down!! This is a blatant example of the double-standards being applied to motorized trails**

- If we ride trails all the time, we are abusing the land. If we don't ride it enough, then by all means shut it down!! Actually this is a blatant example of the double-standards being applied to motorized trails versus non-motorized trails and we will challenge the arbitrary and capricious nature of this position. (4, 38)

**FS Response:** There were no double-standards being applied to motorized versus non-motorized trails. Instead, in this site-specific project, some of the motorized trails in the project area (not all) were proposed for closure to respond to specific concerns related to terrain, soils, wildlife issues, and potential user/safety conflicts.

**60. What most upsets me about the environmental assessment is its open hostility toward motorized access. It is unmistakably clear that the vast majority of environmental impact to the trail system is a result of non-motorized travel. So then, how is it possible to conclude that the best way to preserve the environment in general or grizzly bear habitat in particular is by eliminating motorized travel?**

- What most upsets me about the environmental assessment is its open hostility toward motorized access. Motorized use of the trail systems in question are described in several areas of the document as "very little;" that is, very little of the existing use of a trail system already characterized as having "low use" of any kind, motorized and non-motorized...The EA already acknowledges that motorcycle use is almost exclusively day trips. In stark contrast, for example, page 17 of the EA states that the trails of the Southern Swan Crest are used by two outfitters, which provide trips lasting three to five nights for six to eight guests at a time. When you include private, noncommercial foot and stock use of the trail system, it is unmistakably clear that the vast majority of environmental impact to the trail system is a result of non-motorized travel. So then, how is it possible to conclude that the best way to preserve the environment in general or grizzly bear habitat in particular is by eliminating motorized travel? That conclusion is utter nonsense, and demonstrates with great clarity the open hostility held by the Forest Service toward motorized access. This open hostility is not only unfair, but also violates the current Semi-Primitive designation of the trail system and the Forest Service's mission in general. (69, 113)

**FS Response:** The intent of the environmental assessment was to provide a factual and fair analysis of the existing motorized and non-motorized uses of the area and the potential effects of

restricting motorized use on some of the trails within the project area. Scoping for the project stimulated many comments which were then discussed in the EA. Some of these comments were not favorable to motorized use and some were favorable to motorized use. The fact that these highly variable opinions are disclosed in the EA does not mean that the Forest Service shares any particular opinion. The intent of scoping is engendering comment for the decision maker to consider. How those comments weighed into the actual decision is the reflection of the decision maker's position relative to those comments. To that extent, the "Rationale for the Decision" section and the responses to comments reflect how the Forest Service weighed comments. As mentioned in our other responses, the project was not proposed in order to respond to non-motorized user complaints; instead, this project was intended to address trail specific conflicts related to terrain, soils, wildlife issues, and potential user/safety conflicts.

**61. If the FS closes these trails then there is truly no trail in the forest that can be defended by motorized recreation.**

- If the FS closes these trails then there is truly no trail in the forest that can be defended by motorized recreation. Decisions regarding these trails must not be based on tired old generalizations puked forth once more by the anti-motorized community. These guys don't want motorized activity anywhere and will respond each and every time there is a land use planning process underway with the same old arguments – noise, trail damage, user conflict, solitude... But, this is not Congressionally designated Wilderness where these folks can certainly find those things, it's National Forest land and users should have a reasonable expectation of encountering folks legally recreating in a manner they may not like. (76)

**FS Response:** Please refer to the response to comment #60.

**62. Who is the Forest Service to say a trail is too tough? This trail closure is just another example of the U.S. Forest Service closing people out of the forest.**

- Who is the Forest Service to say a trail is too tough? This trail closure is just another example of the U.S. Forest Service close people like me out of the forest. Would it not be easier just to gate of all the roads? The first road you need to close is the Jewel Basin road the dust is terrible from the cars, all that dust can not be good for the bears. (77)

**FS Response:** We received a variety of comments related to the difficulty level of trails for motorcycle use. See our response to comment #8 related to this concern. This project did not propose to close roads but instead was very specific to the trails in question due to conflicts related to terrain, soils, wildlife issues, and potential user/safety conflicts.

**63. The Forest Service has an opportunity here to prove that it listens to the merits of public comment.**

- FS has an opportunity here to prove that it listens to the merits of public comment and doesn't react merely to the high volume of constant and insatiable cries to outlaw any and all motorized activity...By changing your proposed action you can allow the motorized community a "victory" with very little on the ground impact. (32, 102)

**FS Response:** In comparison to many of our planning projects, this project did receive a higher than usual amount of public comments. In general, about half of the comments appeared to come from motorized interests and about half of the comments came from the non-motorized interests. We appreciate that there is a high degree of interest in the project. The numbers of comments pro or con on a project are not as important as the site-specific insights they provide to the issues to be resolved.

**64. Historical use of the trails should be a prime consideration whether or not a trail is closed to future motorized use.**

- Historical use of the trails should be a prime consideration whether or not a trail is closed to future motorized use. (65)

**FS Response:** The trails in the project area were historically developed for foot and horse access. Although knowing the historical context of a situation is important for a decision at hand, it is not necessarily the prime consideration. For this project, the prime considerations were related to a variety of factors such as how motorized use affects steep terrain, soil types, grizzly bear needs, user/safety conflicts etc. No single factor drove the proposal for restricting motorized use on these trails; instead it was a combination of these factors considered together that led to the proposal.

**65. The EA assumes that only non-motorized users seek to enjoy solitude in the backcountry, motorized users enjoy this same thing.**

- The EA assumes that only non-motorized users seek to enjoy "solitude" in the backcountry – nothing could be further from the truth - motorized users seek dispersed riding opportunities where they can reach areas via motorized means then stop and enjoy the quiet solitude. (102)

**FS Response:** It is our belief that many of the motorized users are accessing these areas for many or all of the same values the non-motorized users have. One of these values is the sense of solitude. Again, though this issue is discussed in the EA, and was extensively commented upon during scoping, solitude and the effects of various modes of travel in that regard, for particular user groups was not the primary focus of this project.

**66. We pay off-road sticker fees, and it doesn't seem like we get much for it.**

- Please give careful consideration to this matter and help us with trails to use. We pay ORV sticker fees plus our normal taxes. Hikers only pay taxes and nothing for trail use. (105)
- We pay off-road sticker fees, and it doesn't seem like we get much for it. How much time do hikers or horses give to trail maintenance? How much area do horseback riders have to ride in terms of number of trails or number of acres? Do they pay sticker fees? (24)

**FS Response:** Sticker fees are a function of Montana state law. These fees help to support law enforcement, a statewide safety and ethics education program, and the OHV grants program. Other users like hikers and horseback riders do not pay sticker fees because the state does not mandate this. Both motorized and non-motorized users do provide many volunteers on particular trails to help maintain them. Motorized trail additions are being considered on the Forest in areas where the combination of issues to be resolved by this project are less extensive.

Individuals and groups from both the motorized and non-motorized communities annually provide us many hours of volunteer work on trails. We greatly appreciate their time and effort, and without their support, some trails would not be open and available to the public.

**67. It seems highly speculative to assume that because an activity is present that a negative impact is imminent.**

- I hope the ID team is beyond finding mere excuses to justify a closure to motorized and can at least show some effort in protecting and preserving an activity that is important to the public and can only be found on our National Forest. More is needed than simply assuming a problem is occurring or will occur. An effect or lack of one has also to be acknowledged, a more finely tuned analysis is needed. It seems highly speculative to me to assume that because an activity is present that a negative impact is imminent. (46)

**FS Response:** The reasons provided for these closures are related to soils, grizzly bears, steep terrain, and user/safety conflicts, which are discussed within the environmental assessment. After the decision on this project, about 40 miles of trails within the Southern Swan Crest (project area) will remain open to motorcycle use.

**68. All users treating each other with decency and respect while sharing the forest with other users with speak volumes more than closures and litigation.**

- No matter how many rules, closures and legislation we pass, we are not going to please all of the people all of the time. All users treating each other with decency and respect while sharing the forest with other users with speak volumes more than closures and litigation. (75)

**FS Response:** We agree entirely with your sentiment.

**69. There is an informal "land swap" understanding in place. That is, the entire North Fork and Middle Fork of the Flathead River ecosystems were to be closed to motorized travel due to protection of grizzly bear habitat (they are adjacent to Glacier National Park), but that in exchange, the Columbia Mountain trail system all the way down into the Swan Range would remain open for motorized travel. Now I find that this is not true.**

- Over the last several years, I have had several talks with Forest Service personnel that assured me that there was an informal "land swap" understanding in place. That is, the entire North Fork and Middle Fork of the Flathead River ecosystems were to be closed to motorized travel due to protection of grizzly bear habitat (they are adjacent to Glacier National Park), but that in exchange, the Columbia Mountain trail system all the way down into the Swan Range would remain open for motorized travel. This trail system is the last remaining high alpine trail system open to motorized travel. I now understand that whatever a Forest Service ranger may tell me is worthless babble, perhaps only intended to placate me and disguise their own agenda, and that the only thing that matters are official rulings that actually open or close trails. I am deeply angered over being consistently misled in this manner. (69, 113)

**FS Response:** We are not aware of which Forest Service personnel you have had these discussions with nor is there an informal "land swap" understanding in place. It is true that trail systems in the North Fork and Middle Fork have been closed to wheeled motorized use. It is also true the Columbia Mountain Trail #51 is open to motorcycle use and was recently confirmed as so in the decision on the Westside Reservoir Post-Fire Project. Table 5 on page 23 of the Bruce Creek environmental assessment displays the amount of motorized and non-motorized trails that would remain after this decision. On the entire Swan Crest, approximately 93 miles would be open to motorcycle use and approximately 166 miles would be closed to motorcycle use. This decision is not programmatic in nature and the purpose and need and the effects of the decision are limited to the project area (Southern Swan Crest) defined in the EA, Table 5.

**70. There are only a lot of "what if" in the EA. The wilderness advocates can't find anything wrong on the trail system except for those "What Ifs."**

- There seems to be a lot of "what if" in the EA. (What if there are more motorized users? What if there are hikers on the trail? What if a grizzly bear hears a motorcycle, etc)...the facts are simple; motorcycles have had low impact, low use, low confrontations, etc. The wilderness advocates can't find anything wrong on the trail system except for those "What Ifs." (45)

**FS Response:** The environmental assessment displayed the current conditions of these trails. It is these specific conditions that led to the proposal of closing the specific trails contained in the

decision to motorcycle use. Our response to comment #1 discusses the conditions that, taken together, led to the proposal.

**71. Open up Connor Creek and Soldier Creek trails and we would have nice loops.**

- Open up Connor Creek and Soldier Creek trails and we would have nice loops. (116)

**FS Response:** This comment does not address the site-specific concerns (erosion, grizzly bears, safety conflicts, etc.) we have with the trails involved in this project. This is beyond the scope of this proposal.

**72. Close the Alpine trail north from Crevice Lake to Six Mile Mountain & close Trail #293. Also close the Southern Swan Crest trails motorized access.**

- I would like to see; The Alpine trail closed north from Crevice Lake to Six Mile Mountain & close Trail #293. *{If not protected}* these trail sections could end up looking like the trails in the Northern Swan Crest namely # 37 # 297 # 51 # 52 . Please consider the trails in the Southern Swan Crest as important hiking and horse riding areas and not subject them to future abuse by allowing motorized access. (5)

**FS Response:** We appreciate your feedback on the other trails in the project area. It was not our intent to restrict all wheeled motorized trail use within the project area; we proposed motorized closures on those trails where there were combination of conditions causing us concern (i.e. steepness of terrain, moist and fragile soils, safety/user conflict, and grizzly bear concerns). The trails you mention do not include those combinations of concerns.

**73. Also close motorized access on the Wire Trail #78, and Trail 7 south to Crevice Lake as this route may continue to ‘encourage’ trespass on the newly closed trail segments.**

- It makes equal sense to close motorized access on the Wire Trail #78, and Trail 7 south to Crevice Lake as this route now stands as an ‘in and out’ which may continue to ‘encourage’ trespass on the newly closed trail segments. (108)

**FS Response:** Please refer to our response for comment #72 above.

**74. It is obvious that most visitors to the Swan Crest area want the natural experience while escaping from a more urban setting**

- Based on a “review of both research and the comments received on this Proposed Action, it is obvious that most visitors to the Swan Crest area want the natural experience while escaping from a more urban setting.” (9, 11, 13, 14, 15, 30, 84, 89, 95, 97, 98)

**FS Response:** Many of the comments did contain similar types of feedback as mentioned; however, we also received many comments describing the concerns from the motorized community. Many of them alluded to their desires of enjoying the natural setting as well but with the use of a motorized vehicle.

**75. This proposal provides better protection for the Swan Front Roadless Area.**

- {This proposal} provides better protection for the Swan Front Roadless Area, which the Forest Service has identified as having outstanding natural values for wildlife and for recreational use...it is visited by many people on foot and horseback seeking a quiet time in a spectacular mountain landscape. (47)

**FS Response:** Thank you for your comment. The purpose and need for this project is site specifically focused on the resolution of the issues discussed in Decision.

**76. Allow traditional foot and stock traffic, do not allow motorized traffic. This will head off a problem before it becomes entrenched.**

- We support efforts to limit those trails to traditional foot and stock traffic, barring motorized traffic. By clarifying this BEFORE motorized traffic becomes established in the area, land managers are heading off a problem before it becomes entrenched. (80)

**FS Response:** We appreciate your feedback.

**77. Closing these trails to motorized use will have multiple benefits to the resource and will enhance the experience and quality of non-motorized trips.**

- I received a copy of the EA on the trails project and I am pleased with the assessment and proposed action. I feel that it will not only have multiple benefits to the resource but enhance the experience and quality of the trips that we offer with our outfitting service. (43)

**FS Response:** We appreciate your feedback on this project.

**78. We hope the district will put effort into enforcing the restrictions on the trails.**

- We also hope that the districts will put forth effort this summer to make sure that these restrictions are respected. This will help not only with keeping relations with non-motorized and motorized user groups civil, it will make sure that the user groups are respecting Forest Service management decisions. (51)

**FS Response:** It is our hope the public will respect all closures including the ones that are currently in place. We have and will continue to enforce all closures to the extent we can.

**79. Motorized use on USFS lands has had rapid growth at the expense of wildlife, air quality, water quality, trail damage, soils, weed spread, safe hiking, and quiet uses of our public lands.**

- Motorized use on USFS lands has had rapid growth at the expense of wildlife, air quality, water quality, trail damage, soils, weed spread, safe hiking, and quiet uses of our public lands. Please remove motorized use of this trail system for the benefit of the many vs. the benefit of the few who find it difficult to recreate without motors. (68)

**FS Response:** We had very specific reasons as to why we proposed the closures of these specific trails to motorcycle use – the combination of concerns related to terrain, soils, grizzly bears, and user/safety conflicts. We did not propose closure of these certain trails in order to benefit one user group over another.

**80. I am discouraged by the frequency of rule breaking by motorized users.**

- I am discouraged by the frequency of rude behavior and rule breaking by motorized users...Illegal trespass is habitual. (64)

**FS Response:** Many of our motorized users are very conscientious about their activity and have helped us out by keeping trails open from downfall and some motorized user groups are also actively engaged in clean up and other volunteer activities on the Forest.

**81. If these trails are closed, we will likely not visit the area again. We will spend our money elsewhere.**

- If these trails our closed, we will likely not visit the area again. These are very special trails and are the reason we spend our hard-earned money to ride. Closing them means we will spend our money elsewhere. Each trip we spend about \$3000 in hotels and meals. (103)

**FS Response:** We know that both local and non-local motorized users recreate on these and other trails in the area. Additionally, money is spent in the community by these non-local users while they are visiting. However, the reasons we proposed the closure of these trails to motorized

use was not related to economic concerns but instead specifically to issues related to soils, grizzly bears, steep terrain, and user/safety conflicts. As discussed in the EA, other trails remain open and available to use.

**82. Trails for ORV are more useful when they connect and have a destination. Signage on these trails is very poor.**

- Trails for ORV are more useful when they connect and have a destination of say Spotted Bear. Signage is also a problem. Signs are weak if they exist at all. (105)

**FS Response:** We do not disagree with your assessment about ORV trails, in general. These particular trails have been open to single track motorized use only, rather than ORV use. Signage can be a problem particularly when they are vandalized and/or removed, however we endeavor to post trail heads with appropriate signage as regularly as budgets allow.

**83. All user traffic will increase over this area in the future. A growing rural population would support that conclusion.**

- Your assessment states a likelihood that motorized traffic will increase over this area in the future. With that generalized statement, you must also agree that ALL user traffic will increase over this area in the future. A growing rural population would support that conclusion. (54, 114)

**FS Response:** The EA on page 20 also acknowledges non-motorized use would likely increase in the future because of the growing population in the Flathead Valley.

**84. I want solid reason why the Flathead has been closing taxpayers roads, trails, recreation areas these gates are being locked.**

- The Forest Service in the Flathead has been closing taxpayers roads, trails, recreation areas for some time now. These are areas that are built by tax money, maintained by tax money, and closed by tax money. It is un-American to tell a taxpaying, law abiding citizen of this great state and country, that he or she no longer can go ride a dirt bike or get in their jeep, and go hit the trails on a Sunday afternoon...I want solid reason why these gates are getting locked. Reasons such as wildlife habitat and soil erosion are bull\*\*\*\* answers. (28)

**FS Response:** This project does not involve gating roads, but does prohibit wheeled motorized use on about 20 miles of trails. The reasons provided for these closures are related to soils, grizzly bears, steep terrain, and user/safety conflicts and are discussed in full within the environmental assessment. After the decision on this project, approximately 40 miles of trails within the project area (Southern Swan Crest) will remain open to motorcycle use.

**85. I am very shocked and outraged the Forest Service (FS) wasted all of the money they did to perform an Environmental Assessment (EA) for this plan, just to try and eliminate 2-4 motorcycles per year. How much did this EA cost the FS?**

- I am very shocked and outraged the Forest Service (FS) wasted all of the money they did to perform an Environmental Assessment (EA) for this plan, just to try and eliminate 2-4 motorcycle per year and only because some non-motorized users may "potentially" "receive less-than-satisfactory recreational experiences" because they may cross paths with a few motorcycle riders. Talk about a waste of taxpayer's money. Give me a break. How much did this EA cost the FS? (34)

**FS Response:** There are a variety of reasons provided in the environmental assessment as to why the 20 miles of trail are proposed for closure to wheeled motorized use. Our reasons or purposes for the project were not necessarily related to social conflicts between the different user groups. The conflicts to be reduced were those primarily related to the combination of conflict with grizzly bear security and motorized use, and the conflicts created on some portions of the trail where motorcycle use can disproportionately lead to trail rutting, switch back rutting, and other physical impacts to the trail. Our response to comment #27 may provide more information to you regarding our perspective on the user conflict comments we received on this project.

We do not track project by project planning costs, but Environmental Analysis of this type typically cost in the range of \$10,000 to \$50,000

**86. These trails offer the FS an opportunity to actually change a proposed action based on compelling public input as well as the changed circumstances of Judge Molloy's ruling.**

- These trails offer the FS a golden opportunity to actually change a proposed action based on compelling public input as well as the changed circumstances of Judge Molloy's ruling. (102)

**FS Response:** Judge Molloy's ruling was relative to the Moose Post-Fire Project only. The decision does validate the Forest approach to site specific analysis of effects as it relates to implementation of A19 direction. The Flathead National Forest has always believed that site specifically applying A19 habitat objectives may reveal unanticipated or impractical results (A19 Decision Notice, 1995, page 16). That is why the Moose project included site specific amendments to the grizzly bear habitat objectives. The resource conditions, including the recreational opportunities, were such to warrant not achieving A19 objectives for this specific project.

**87. Is it allowable for people to shoot at the gravel pit on the lower end of Jewel Basin Road near the Wolf Creek Trailhead? (112)**

- At the gravel pit on the lower end of Jewel Basin Road near the Wolf Creek Trailhead, people are shooting there and there are shell casings on the road. Is it allowable for people to shoot there? (112)

**FS Response:** This comment is not specific to this project. However, it is legal for people to shoot in that location as long as they follow proper safety precautions like having a backdrop etc. It is not legal for them to leave their shell casings on the road, as that constitutes littering.

**88. In the EA, the FS put in the 57-kilometer running race, but did not mention the Columbia Mountain to Spotted Bear annual motorcycle ride. This ride has been going on much longer.**

- In the EA, the FS put in the 57-kilometer running race, but did not mention the Columbia Mountain to Spotted Bear annual motorcycle ride. This ride has been going on much longer, 10-12 years, and has 15-20 participants. (113)

**FS Response:** The reason the 57 kilometer running race was mentioned was because it was a commercial activity requiring a special use permit.

**89. In the effort to reduce energy consumption and keep the air clean, the best proposal is to prohibit motorcycles. (7)**

- In the effort to reduce energy consumption and keep the air clean, the best proposal is to prohibit motorcycles. (7)
- I do applaud current efforts to get the gas-guzzlers out of our forests. (79)
- I wish to offer my full support of your proposal to eliminate motorized use of several trails in the area near Jewel Basin. This makes sense in so many ways, not the least of which is that it may discourage, in a small way, the use of oil-based fuels at a time when reduced use of petroleum products is critical, on a worldwide basis. (37)
- We also support the proposal because it will help conserve increasingly scarce fossil fuels and help America become less dependent on foreign oil. There is no good reason to consume fossil fuels destroying the peace and quiet of America's public lands while other, more essential needs for fossil fuels either go wanting or are met only through increased fuel prices that have negative cascading negative effect on our economy. (89)
- In future environmental analyses, we ask that the Forest Service thoroughly examine the degree to which allowing motorized vehicles off-road on public lands hampers America's efforts to become more energy independent. (89)

- Allowing motorized vehicles on trails in the Swan Range compounds the consumption of fossil fuels by displacing hikers from nearby trails and forcing them to drive further from home to find a bit of peace and quiet on public lands. Keeping and restoring Swan Range trails to non-motorized status will contribute to America’s energy independence. (89)
- With gas prices on the rise, it is just another reason to secure the Swan Crest so ordinary people, wilderness supporters, hikers, horseback riders, and backpackers have a place to enjoy that is close to home. (96)

**FS Response:** Several comments included variations of the statement that they supported the proposed action as it reduced the use of fossil fuels. The purpose and need for the proposed action do not relate to the limitation of use of fossil fuels. Motorized uses of the National Forest have a legitimate place under current laws and regulations. This action was not proposed to any degree relative to the issue of fossil fuel consumption and the closure of trails, roads or highways to reduce such consumption is beyond the scope of this decision.

**90. Judge Molloy has recently ruled that Amendment 19 is only one of many factors that forest managers, may consider in determining appropriate road density for a particular section of the forest.**

- Judge Molloy has recently ruled that Amendment 19 is only one of many factors you, as forest managers, may consider in determining appropriate road density for a particular section of the forest. (102)
- It is my belief that the decision to close these trails is primarily driven by a perceived need within the FS to further attempt strict compliance with an outdated and no longer mandatory “Amendment 19.” ...US District Judge Donald Molloy stated that local forest managers may consider many factors beside Amendment 19 in determining and applying road density standards...I believe this allows the type of flexible management decision, which does not require you to permanently criminalize the recreational activity of motorcyclists to comply with Amendment 19. (32, 81)
- There is no longer a need to close these trails to help the FS comply with the strict letter of “Amendment 19” which established road density standards in this “Grizzly Habitat” that were treated by the FS as mandatory. (74)

**FS Response:** See response to comment #86.

**91. The Decision Officers should pursue alternatives to simple closure as a way to satisfy A19 requirements.**

- I encourage the Decision Officers to pursue alternatives to simple closure as a way to satisfy A19 requirements. (46)

**FS Response:** The reasons provided in the environmental assessment for the proposed closure of the motorized trails were related to a combination of factors – terrain, soil types, user/safety conflicts, and grizzly bear needs. No single factor drove the proposal for restricting motorized use on these trails; instead it was a combination of these factors considered together that led to the proposal.

**92. Amendment 19 and Inventoried Roadless Areas address roads and not motorized trails.**

- The references that you make towards Amendment 19 and Inventoried Roadless Areas are incorrect. They address roads and not motorized trails. (48)

**FS Response:** Amendment 19 includes motorized trails in its calculations for open motorized access density, total motorized access density, and secure core percentages, Environmental Assessment (refer to Appendix D of the Amendment 19, Allowable Sale Quantity and Objectives and Standards for Grizzly Bear Habitat Management). Often, Inventoried Roadless Areas contain motorized trails as occurs within the project area. The inventoried roadless section of the environmental assessment did not conclude motorized trails could not occur within these designated areas; instead, it assessed the effects of these trails on the roadless character of these areas, characteristics such as remoteness and solitude.

**93. You are using generalized characterizations to support your conclusions that affect a usage closure. I would rather that our National Forest access changes involve specific, documented impacts to the subunits involved.**

- I would also submit that your term "Open Motorized Access Density" is subjective, used to imply negative impact from minimal use...Unless you can pinpoint a specific corridor of traffic that is negatively impacted by infrequent motorized use, you are using generalized characterizations to support your conclusions that affect a usage closure. This is not an acceptable method of logic to me. I would rather that our National Forest access changes involve specific, documented impacts to the subunits involved. (54)

**FS Response:** Open motorized access density is an objective used to measure effects to grizzly bears. This objective is included in our Flathead Forest Plan as way to improve security for grizzly bears. The specific effects of the decision as related to grizzly bear security are documented in the EA on pages 32 to 40 and in the project record.

**94. The Grizzly is doing fine. Why not open up old roads, categorize them as trails, and stop shutting trails down to meet your requirements or goals?**

- Amendment 19 says something about number of trails or miles only, open in a particular unit otherwise it can't be classified as Grizzly Bear area. The Grizzly is doing fine. Why not open up old roads, categorize them as trails, and stop shutting trails down to meet your requirements or goals? (72)

**FS Response:** Opening up old roads to motorized use would increase open motorized access density, which would likely require closing other motorized routes to meet the “no net loss” habitat security management direction under Amendment 19 to the Forest Plan.

**95. These restrictions will bring the Swan Lake and Jungle Addition Bear Management Unit grizzly bear subunits closer to compliance with Amendment 19.**

- These restrictions will bring the Swan Lake and Jungle Addition BMU grizzly bear subunits closer to compliance with Amendment 19. (90)

**FS Response:** The EA disclosed the A19 conditions pre and post project on page 38.

**96. This project did not consider a full range of alternatives.**

- The Travel Plan EA does not comply with the NEPA requirement of a full range of alternatives...There were comments sent in that addressed the need for more motorized trail use. The only action alternative that you presented was one that reduced this use...There should have been another alternative that addressed additional motorized use. NEPA requirement: Rigorously explore and objectively evaluate all alternatives. (67)
- FSM 2300 chapter 2350 policy: The Forest Plan set the direction for the management of the land. When the existing Travel Plan situation is different from the Forest Plan direction, complying with the Forest Plan direction will be accomplished as soon as practicable through implementation process. I believe the EA goes against Forest Plan Direction. (67)

**FS Response:** Both alternatives in the EA are within the Forest Plan direction. The Proposed Action as described in the EA will remedy site specific issues and move the Forest toward compliance of Forest Plan objectives. This is a site specific decision based on site specific issues and is not a “travel plan EA” as characterized by the comment. See page 8 of the EA discussing the relationship of the project to Forest Plan direction. Each resource effects analysis concludes with a regulatory framework that discusses applicable Forest Plan direction for that resource.

**97. Concern with fairness and hidden and/or perceived agendas.**

- This project appears to be a way to circumvent the 2005 Travel Planning Rule. Region 1s objective is to eventually close all roadless areas to motorized use. This has nothing to do with social issues or Forest resource issues. (67)
- The 2001 3 State OHV Rule required the FS to complete a trail inventory and analysis. By your statement of potential erosion problems it is clear to CBU that you have not analyzed these trails prior to travel planning. This action does not comply with the 2001 3 State OHV Rule. CBU requests that all trails be analyzed and mitigation techniques to address any identified resource damage be proposed prior to closure. Trail closures to multiple uses must only be a last resort if mitigations measures fail. (70)

**FS Response:** The Flathead National Forest has been conducting travel planning and analysis of motorized routes (trails and roads) on a project by project basis. Site specific analysis allows the Forest to move towards implementation of the conditions of the Forest Plan, including Amendment 19.

**98. The Forest Service has an obligation to provide motorized and non-motorized recreation.**

- The Forest Service has an obligation to provide recreation for all types of people – not just non-motorized. The Travel Management Plan did not give you authority to take away motorized use. The National Forest Management Act details the direction for managing the land and resources. Managing a forest does not mean shutting down motorized use. (4, 38)

**FS Response:** The Forest Service does manage recreation for all users, including motorized. We do recognize the value of all different methods of recreation. It is not the intent or the result of this decision to prohibit motorized use on the Forest.

**99. The EA does not address the cumulative impacts to motorized use.**

- The cumulative effects of the past-motorized closures have had a direct effect on the Flathead Forest and should have been addressed in the EA. The EA does not address the cumulative impacts to motorized use. The EA does not address the closures to motorized use in the surrounding forests. (67)

**FS Response:** The EA does address cumulative effects to motorized users on page 23. The project analyzed cumulative effects on the non-wilderness areas immediately accessible to the Flathead Valley on the Flathead National Forest.

**100. This project may have individually insignificant but cumulative significant impacts.**

- NEPA part 1508.27 b7: Whether the action is related to other actions with individually insignificant but cumulative significant impacts. Significance exists if it is reasonable to anticipate a cumulative significant effect on the environment to include the human environment (40 CFR 1508.13). Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts. Your EA does not follow NEPA procedures. (67)

**FS Response:** The Bruce Creek Trail project has followed appropriate NEPA procedures. The effects of the alternatives including the direct, indirect and cumulative effects of all past, present and reasonably foreseeable activities have been disclosed. The Responsible Officials have not avoided the “Significance” of the actions or effects by determining them to be temporary or by breaking them down into smaller components. Please also refer to the Decision Notice and Finding of No Significant Impacts for additional information regarding significance findings.

**101. An economic impact analysis should have been conducted along with a recreational impact assessment for the local area affected.**

- Due to the uncertainty regarding recreational visitation changes/displacement that may occur following travel management decisions, an economic impact analysis should have been conducted along with a recreational impact assessment for the local area affected. (67)

**FS Response:** The amount of recreational use occurring on Bruce Creek trails project is not expected to result in significant economic or recreation impacts. The motorized use of these trails is estimated to be low which does not warrant this level of analysis. (See EA pages 16-19). The economic effect of closing 20 miles of trails to wheeled motorized use was not brought up during the public scoping process. Additionally, since motorized use occurs at such a low level on the affected trails (refer to the EA on pages 7, 12, and 15 for examples of such statements); the proposed closures are not expected to result in any significant economic change and therefore was not deemed necessary to conduct an economic analysis.

**102. The economic impact analysis used is inadequate and true data should be collected in your area.**

- The economic impact analysis used estimated and generated data. CBU finds this to be inadequate and requests that you make an effort to collect true data from businesses and residents in your area. This action is required by the Presidents Environmental Quality Council. (70)

**FS Response:** The data used for the analysis is considered the best available information.

**103. We request that Region 1 complete a region wide programmatic social and economic impact analysis on travel plans in the Region.**

- We also request that Region 1 complete a region wide programmatic social and economic impact analysis. The many closures to multiple uses in several ongoing forest management and travel plans in Region 1 is surely having a negative impact on everyone. Agriculture and grazing, resource industries and recreation are all being affected and Region 1 needs to analyze the cumulative affect of these widespread closures prior to moving forward with forest management and travel planning projects. (70)

**FS Response:** Thank you for your comment. This is beyond the scope of this project.

**104. What has been done with the 5 ideas in the January 24, 2006 Regional Forester letter?**

- I have read and have in my possession the letter Abigail R. Kimbell wrote to Kerry White in Gallatin Gateway, Jan. 24, 2006. In there are 5 statements and lengthy ones. Very interesting and what have you done with any of the ideas in a year? (72)
- On page 19 of the April 2008 EA it states”; some activities and opportunities do not blend well with others.” This statement reflects a desire to separate users as justification to close motorized trail opportunities. The enclosed document from Region 1 Supervisor, Gail Kimbell, clearly states that the desire to separate users is not justification for closures. Please take a hard look at using desire to separate users as a valid reason for closing trails to motorized recreation. (70, 71, 72)

**FS Response:** The decision was based on resolution of the site-specific issues which are thoroughly discussed in the “Rationale for the Decision” portion of the document. The purpose and need for the proposed action are not focused on a desire to separate users. The responses to comments #11 and 13 provide more detail in that regard.

**105. What is the monitoring plan for this project?**

- You have used estimates in gathering your user information (pg. 21 of EA). If this plan is implemented the Forest Service will be required to do yearly monitoring. Does your agency have a plan in place to staff and fund this required monitoring? Please supply CBU with an outline of your monitoring plan. (70)

**FS Response:** The EA did not require any specific monitoring. Trail crews will assess trail conditions and trailheads on a periodic basis

**106. The decision was made prior to analysis and is not justified.**

- This formal proposal and EA prove the validity of our year-old comments that the arbitrary decision to close the trail was made long ago, and all the pretense of public involvement is a waste of everyone's time. The EA admits over and over that there is no real need for the closure, that the proposal is based on speculation, and thus violates the Administrative Procedures Act and NEPA. (101)

**FS Response:** A considerable amount of time has been spent evaluating all comments and these comments have been utilized in developing the decision and the rationale for the decision. The reasons for the closure are disclosed in the "Purpose and Need" discussions in the EA and the Decision and are expanded on the "Rationale for the Decision" portion of the Decision Notice as well as in the response to comments.

**107. Travel planning on the Flathead National Forest is being done in a piecemeal manner.**

- It is truly frustrating that the Flathead Forest is discouraging meaningful public disclosure, review and participation by conducting numerous sham "travel planning" processes and continue to make cumulative piecemeal decisions that incrementally eliminate motorized access to lands that are by law to be managed for multiple use. Why weren't you up front with the public last year in the "travel planning" exercise instead of playing like there would be no change to the existing situation only to spring this proposal with another sham EA planning process this year. (101)
- Please work to ensure that there is a comprehensive analysis of the existing situation and future recreation and transportation needs integrated into the Forest Plan Revision that will result in some reasonably balanced goals and objectives to be achieved. This incremental piecemeal closure process is a violation of NEPA and common sense. (101)

**FS Response:** Specific project level decisions have occurred on the Flathead National Forest on a project by project basis. Forest Plan Amendment 19 (1995) set forth grizzly bear habitat security objectives for individual grizzly bear management subunits that play a large role in the extent to which motorized access can be managed. The potential for this project was brought up during Spotted Bear's open house in February of 2007.

**108. These project trails in the Draft Revised Forest Plan were proposed to be kept open to motorcycle use and this project changes designation.**

- The very trails that are proposed to be closed were designated in the Draft Revised Forest Plan released in April of 2006 to remain open to historic traditional use. Now the Flathead National Forest is renegeing on that commitment before a final decision on the Forest Plan. That tells us a lot about the credibility of USFS "long range land use planning." (101)

**FS Response:** The draft 2006 Forest Plan showed trails which would be managed as available for motorized use in MA 2.2 areas in the Geographic Areas section of the document. The Southfork Geographic Area table showed Bruce Creek and the Alpine 5 from Crevice to Napa point trail as open for such use. The Swan Geographic Area showed the Napa Point trail and the Alpine 7 from the Crevice Lake to the Napa Point trail junction as closed to motorized use. Conflicting management was shown for this portion of the Alpine 7 which is shared on the divide between the two geographic areas. The Napa Point trail only occurs within the Swan Geographic area and was shown as not motorized in the draft plan. The Bruce Creek trail only occurs in the Southfork Geographic Area and was shown a open to motorcycle use. The draft plan sent out in 2006 was meant to elicit comment and we regret that the trails were not consistently displayed in that draft. However, the revision of the Forest Plan was and has been delayed. This action is under the existing forest plan and the proposal independent of how it was displayed in the draft plan in 2006, has been consistently displayed in scoping since 2007.

**109. It appears that the decision to close the project trails was made a long time ago and the "Travel Planning Open House" was simply the first step in an eyewash process to legalize this decision**

- How was this proposal announced? There is nothing on the Flathead National Forest website about this proposal, no project or plan notice, no news release, only a notice that an "Open House" was held back in February to kick of a "travel planning process." Yet I understand from an article in the April 26 edition of the Bigfork Eagle there is a May 4, 2007 "comment deadline" established. It appears to me the decision to close the trails was made way back and the "Travel Planning Open House" was simply the first step in an eyewash process to legalize their decision. When is the last time the Flathead Forest made any significant change to a "proposal" after their official "public comment" process? (101)

**FS Response:** Public involvement is described in the EA on page 7. To summarize, the Forest Service sent a letter of invitation to interested contacts. This mailing list was based on past involvement on Spotted Bear Ranger District projects. Also, a news release was issued, and we posted information on the open house of the Flathead Forest webpage. Over the past few years there have been ongoing public comments about the management of trails in the Swan Crest area. In February 2007, Spotted Bear Ranger District held an open house related to implementing the national rule regarding motorized travel management and off-highway vehicles. (OHVs) The District asked if there was a need for change to the existing situation. We received 60 letters, emails, other correspondence, phone calls, and visits providing feedback. About half of the comments were related to trails in the Southern Swan Crest Area. (Project File, Section D).

The Forest Service evaluated information we heard and received at the open house in addition to resource issues. A site specific proposed action was developed. Detailed public involvement on this proposed action occurred. In April 2007, the public was invited to participate with the Proposed Project through informational news releases, mailings, publication of the project in the Forest Service's Schedule of Proposed Action, posting of project information of the Flathead

Forest web page, and one-on-one meetings. We received 111 letters, emails, other correspondence, phone calls, and visits providing us feedback on our Proposed Action. Section G of the Project Record provides documentation of the public involvement and scoping process.

Public comment during scoping was used to develop alternatives to the Proposed Action. A considerable amount of time has been spent evaluating all comments. These comments have been utilized in developing the decision and the rationale for the decision. The reasons for the closure are disclosed in the “Purpose and Need” section of the EA and are expanded in the Decision Notice, particularly in the rationale section as well as in Appendix A - response to comments on the EA.

**110. The Forest Service should not prevent access to certain outdoor recreation user groups.**

- The Forest Service’s chosen solution is in direct conflict with The Multiple-Use Sustained-Yield Act of 1960, which declares, "that the purposes of the national forest include outdoor recreation, range, timber, watershed and fish and wildlife.” Has the Forest Service decided to set aside this Act and cease to manage our national forests for the purposes it was established to direct and protect? Preventing access to certain outdoor recreation user groups is not mentioned anywhere in the contents of the Act. (81)

**FS Response:** The Proposed Action is not in conflict as described. Please see the response to comments #13 and 25 relative to how the proposed action reflects Multiple Use concepts.

**111. A more thorough review of motorized recreation needs should be done.**

We request that the Flathead National Forest provide an adequate and fair evaluation of:

- The needs of motorized recreationists and the cumulative impacts of motorized closures,
- All existing routes including those meeting National OHV Rule guidelines and currently closed routes,
- The current imbalance of non-motorized to motorized trails, and
- At least one pro-recreation alternative in the analysis.
- Under the existing condition, 47.6% of the Flathead National Forest is set-aside for segregated exclusive non-motorized use for 1.59% of the visitors to the forest. A reasonable management goal for the remaining 52.4% 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 87/13 imbalance. (38)

**FS Response:** Thank you for the input. You are requesting information beyond the scope of this project, and Purpose and Need. The proposal and alternatives do address direct, indirect, and cumulative effects of the proposal and its alternatives.

**112. Why does the Forest Service continue to shut out motorized users?**

- This is frustrating to have you spend our time and money having to respond and keep you posted on our continued feelings and the need to keep trails open. Why is it a hassle for you to keep our comments, which don't change, updated on the same topic, year after year? Why do you fight us, and why do you shut us out more and more every year. We can't win, why do you even ask us? You do what you want anyway and still complain about your budget and high costs of having to get out in the woods and maintain what you can.? (72)

**FS Response:** Public involvement and participation are important to inform, shape, and highlight issues relative to specific project proposals. We can understand the frustration if similar issues appear to always have similar outcomes despite your input. Despite your experience, we do look at project decisions to expand or contract motorized use as unique to their settings and site specific input is very important to help make informed decisions. We recognize not all involvement and participation gets the responses and decisions that a commenter would prefer. Please be assured that all comments and feedback are considered. The Forest is considering expansion of motorized uses in other portions of the Forest which do not have the same resource issues as the project area, and would welcome your feedback when we begin to scope potential projects in that regard.