

## PUBLIC INVOLVEMENT

A Notice of Availability of the DEIS for the Little Belt – Castle – Crazy Mountains Travel Management Plan was published in the Federal Register on September 23, 2005. A legal notice was also published in the Great Falls Tribune on July 15, 2006. A 60-day comment period was provided. In response to requests for additional time to comment, a 30-day extension was provided, closing October 15, 2006.

The DEIS and other information on the project was distributed as follows:

- Maps of 8 alternatives were posted on the Lewis and Clark Forest internet website effective May 8, 2006
- Full text of the Draft EIS was posted on the website effective July 11, 2006
- Hardcopy of 385 page DEIS, and 8 alternative maps mailed July 7, 2006, to 61 libraries and 28 organizations/individuals
- CD (compact disc) of DEIS and maps mailed July 10, 2006, to 1,848 people
- 15 hardcopy DEIS and 88 CDs were handed out or mailed as requested



A total of 9 public meetings were held following release of the DEIS. The meetings took place in White Sulphur Springs, Lewistown, Billings, Harlowton, Stanford, Great Falls, Townsend, Neihart, and White Sulphur Springs. These meetings were attended by a total of 483 people.

Approximately 1,783 letters, e-mails, and form letters were received from the public with comments on the DEIS. The majority of public comments (58%) were form letters. About 626 letters (35%) had substantive comments, 91 letters (5%) had no name or postal address, and 30 letters (2%) were received after the comment period ended.

## **THE PUBLIC COMMENT ANALYSIS PROCESS**

The analysis method used for this project provided a means of categorizing each person's comments into separate subjects, then grouping like subjects together so that the public's comments could be more thoroughly examined.

Public comments were received in the form of letters or postcards, electronic mail (e-mail), and facsimiles. A Content Analysis Team reviewed all the comments on the DEIS. Substantive comments from each letter, e-mail, or form were identified. Each issue or topic was assigned a category code and the various comments dealing with that topic or issue were grouped under the category code heading. (Appendix B provides a list of codes.)

Respondent's names are listed below with category codes to allow the reader to see how their comments were responded to or used. Persons wishing to find responses to their comments on the DEIS should locate their name and assigned codes below and the corresponding ID Team response. For example:

Adkins, Terry	103, 1104
Anderson, Kevin & Erica	109, 1101, 301
Anderson, Gary and Vic	1109, 1201, 1303, 1601

While the respondent will not likely find their individual comment, by finding the category codes listed next to their name and the corresponding summarized comment, you can see how similar comments were addressed. A complete Content Analysis report is contained in the project file.

Only letters from Federal and State agencies are reproduced in Appendix L. They include letters from the U.S. Department of Interior, USDI-Environmental Protection Agency, Montana Department of Environmental Quality, Montana Department of Fish, Wildlife and Parks, and Montana Department of Transportation. All letters from other agencies, organizations, and individuals are in the project file.

## ORGANIZATION AND AGENCY NAMES AND COMMENT CODES ON DEIS

American Wildlands	1111, 1500, 1502, 1700, 1803, 200, 501
AOPA John Collins	1110
Billings Motorcycle Club	1500, 1502
BlueRibbon Coalition	1001, 1004, 1106, 1304, 1802, 201
Bullhead 4 Wheelers, Inc.	200
Capital Trail Vehicle Association	1000, 1001, 1002, 1004, 1006, 1100, 1102, 1105, 1106, 1107, 1108, 111, 1204, 1206, 1300, 1302, 1500, 1501, 1502, 1601, 1700, 1801, 1802, 1804, 200, 201, 300, 301, 400, 700
Citizens for Balanced Use	1106, 1108, 1304, 1800, 1801, 1803, 1804, 301
Conservation Congress	1102, 1303, 301
Conservationists with Common Sense	1102
Cook County ATV club	1006
Experimental Aircraft Association	1110, 1201, 1206, 302
FSEEE	1002, 1004, 1111, 1204, 1400, 1600, 1700, 1800, 1803
GF Cross Country Club	1005, 1006, 1104, 1304, 1800
GF Snowmobile Club	1001, 1005
GFTBRA	1000, 1001, 1102, 1105, 1108, 1109, 1300, 1303, 1304, 1500, 1501, 1800, 1801, 1803, 200, 301, 302
Great Falls Chapter of Safari Club	1100, 1109, 1800
Magic City 4 Wheelers, Inc.	1006, 1500, 1501, 201
Meagher County Little Belters	1101, 1104, 1106, 301, 301
Monarch Area Community Assoc.	400
MT Dept of Environmental Quality	1004, 1500, 1700, 302, 309
MT Dept of Transportation	1110
MT FW&P	1006, 1109, 1303, 1304, 1400, 1500, 1501, 1502, 1800, 1802, 1803, 201, 302, 500, 501, 600, 900
MT Multiple Use Association	1002
MT Pilots Assoc.	1109, 1110, 300, 302
MT Pilots Association	1006, 1100, 1303, 200, 201, 300, 302
MT Wilderness Assoc.	1000, 1001, 1002, 1006, 1100, 1102, 1105, 1106, 1110, 1111, 1201, 1202, 1203, 1204, 1206, 1303, 1304, 1400, 1500, 1501, 1601, 1700, 1800, 1801, 1802, 1803, 1804, 200, 301, 500, 501, 600, 701
MWF	1109, 1502, 1800, 201
Rimrock 4x4 Association	1006, 1502
Ski Lift, INC.	1303, 1501
Treasure State Alliance, Inc	1001, 1006, 1304, 1801, 201, 301
Trout Unlimited	1303, 302, 500, 501
TSATV Association	1109, 1200, 1501
US Environmental. Protection Agency	100, 1000, 1004, 1006, 1110, 1303, 1500, 1600, 1700, 1803, 200, 302, 500, 501
USDI	1804
WildWest Institute	1803

## INDIVIDUALS NAMES AND COMMENT CODES ON DEIS

Adkins, Terry	103, 1104	Carlson, Dave, Karen & Kyle	1000, 1106
Anderson, Kevin & Erica	109, 1101, 301	Clark, Jim	1108
Anderson, Gary and Vic	1109, 1201, 1303, 1601	Cobun, Charles & Susan	201
Annau, Heidi & Tom	113, 1502	Combs, James A	1108, 1501
Baker, Shawn	1100, 201	Cosgrove, Joe	1109
Baker, Ralph	1109, 1110	Crof, Chris	1500
Barry, Mark	1104	Cushman, Travis	1501
Bartler, Gertrude	400	Davis, Nigel	1109, 1502
Beer, Rod & Julie	1100, 1201	DeBar, Dan	1206, 201
Beisel, Jim	1100, 1200, 1203, 1700, 301	DeShaw, George	1107, 1108, 1203, 1300, 1500, 1801, 1803, 200, 300
Belohlavek, Carol	1100	Dolberg, Kent	1100
Belzer, Paul	1110, 1303, 201, 302	Dorton, Beth	1304
Bergman, Howard	1103, 1110, 900	Duncan, Susan	1100, 200
Bernard, Joanne	1800	Earl, Thomas	1303
Berti, Justin	201	Eggebrecht, Brian	1101
Best, Neal	1601	Ehnes, Cory & Trish	1500, 1502
Bibeau, Tony	1101	Ehnes, Romona	1005
Bjornlie, Harvey & Sheila	1303, 201	Eisenzimer, C.R.	1102, 1102, 1800
Black, RW	1106, 1501	Emerson, Richard	1109, 1110, 1201
Bloomquist, Carl	200	Erickson, Jay	1100, 1206
Borgreen, John	700	Eskew, Curt	1110
Boughton, Alice	1400, 201	Evans, Jeffr & Margie	1108, 1501
Brown, Mike	1000	Eyre, Justin	1300
Bruno, Lou	1303	Fabian, Lynn	1303, 1800
Bucklin, Oliver	1108	Fauth, Jack	1102, 1103, 1800
Burch, Theron	1106, 1304, 1501, 300	Felstet Family	1109, 1501
Burk, Stoney	1303	Fisher, Joanne	1001, 1300, 1304, 300
Burrows, Patti & Frank	1110, 1303	Fligel, Charles	1110, 1110, 1804
Burton, Catherine	300, 400	Forsman, Vince, Vance, & Victoria	300
Byerly, Dave	1200, 1501	Fortna, Sarah	1601
Cahill, Pat	1100	Fortune, Bill	1000, 1104, 1110, 1304, 200
Cain, Jerome	1108, 1110, 302	Frank, Plumlee, Bob & Karen	1110
Call, Dave	1110	Gallagher, Eileen	1100
Calvert, Joanie	1101, 1109, 1304, 1801	Gallea, Bill	1109, 1110, 1201
Calvert, Chris	1501	Galt, David	800

Gates, Robert	201	Hormell, Bob	1000
Geiger, Rick	1110, 1203, 1304, 300, 302	Horton, Shane	1303
Girres, Jerry	1304	Hoven, Brian	1105, 1200
Good, Mark	1000, 1001, 1003, 1100, 1110, 1111, 1201, 1300, 1303, 1304, 1400, 1500, 1501, 1601, 1700, 1804, 200, 300, 302, 500, 501	Howard, Les	1102
Goodyear, Kyle	1101, 1108, 1304, 1803	Hughes, Robert	1110
Gray, Randy & Nora	1109, 1303, 200	Huidekoper, Peter	1501
Gunion, Terry	1111, 1201, 1303, 1501, 1601	Hustwaite, David	1502
Guthmann, Scott	201	Jaeger, Elroy & Carol	201
Hadden, Dave	1303, 1500	Jarecki, Penny & Chuck	1106, 1110, 1202, 1303
Hall, Kyron & Kathy	1501	Jefferson, T.L.	1801
Hall, William	1804, 200	Jennings, Gerry & Charles	1303, 1601
Hancock, Beverly	1200	Johnson, Art	1501
Haney, James	1501	Johnson, Eugene A.	1601
Harris, Chuck & Judy	1110	Jonas, M.A.	1303
Hassler, Lowell	1203, 1500, 1502, 1700, 201	Jones, Mary	1110, 1202, 1601
Hedrick, Charles	1006, 1006, 1502, 200	Juntunen, Anthony	300
Hedrick, Robert & Shirley	1108, 1502	Juras, John	1101, 1102, 1304, 1501
Held, Mike, Kathy & Eric	1501, 201	Kaesgen, Jonathan	201
Hepp, Mike	200	Kaiser, Brian	1501
Herzog, Scott & Mary	1501	Kalur, Jerome	100
Hill, Craig	201	Kempa, Dan & Rene	1000, 1001, 1101, 1102, 1103, 1106, 1300, 1303, 1501, 1502, 1804, 300
Hill, Stacy	1102	Kindle, Sharon	1006
Hillman, Sharon	1501	Kohut, Karen & Chuck	201
Hirons, John	1110	Kolling, Dan	1303
Hitch, Dixon	1304	Konesky, Joe	1000, 1109
Holbrook, Kelly	1501	Konesky, Arienne	1106, 1109, 1501, 1502, 1800, 301
Holst, Terrence	1106, 1109, 1300, 1502	Krone, Harold	1501
Holze, Mark & Kim	1102, 1502	Kudray, Greg	1100, 1601
Holzheimer, Rick	1006, 1103, 1108, 1300, 1502, 500, 501	Lambing, John	1102
Hooley, Dan	1304	Langfeldt, Allen	1802, 200
		LaRocque, Fred	1501
		Lavoie, Benjamin	1105, 1501
		Leach, Morgan	1801, 1803
		Lehmann, Don	1101
		Lencioni, Gordon	1501, 200
		Lencioni, Dan & Christine	1803
		Lencioni, Michelle, Brad, & Dylan	1300

Lents, Brian	1303	Moody, Gy	1203
Levandowski, Jerry	1102, 1300, 1501, 1501, 1700, 1800	Moran, John	1110
Levine, Dan	1103, 1111, 1300, 1501, 200	Nelson, Larry & Arlene	1800
Lewin, Stuart	1204, 200, 500	Newell, Susan	1500
Liebert, Richard	1200, 1203	Newman, Dave	201
Lilja, Dan	1110	Nolan, Barry	1500, 501
Litostansky, Ron	1501	Nolen, Really	1500, 201, 302
Lodge, Tim	201	Nordby, Steve	201
Logan, Doug	1502, 1800	Omen, David	1100
Lohse, Steve	200	O'Neil, Jay	1101, 1102, 1303
Longress, Jack	201	O'Neill, Kemp	1001, 1105, 1106, 1300, 201
Love Jr., Jack	1002, 1003, 1004, 1100, 1102, 1104	Ortwine, Kathleen	1100, 1304
Lund, Roger C.	1108	Oswalt, Jim	1304, 1501
Mader, John & Kay	1501, 1502, 201, 301	Paasch, John	1102
Manning, Chuck	1110	Packila, Mark	1109, 1110
Mapster, Ken	1108	Palmer, Carrie	1304
Marcinek, Matt	1600	Parker, Amy	1109, 1400, 1501, 1804
Marsden, Bruce	1202	Patnode, Jeffery	1110
Marshall, Susan	1104, 1200, 1801, 200, 201	Penak, Anthony	1100
Martineau, Fred & Linden	1200	Petersen, Jamey	1300
Marvin, Sanders	1202	Petersen Jr., JD	1100, 1109
Mathias, Ralph	1110, 1201	Phelps Family	1206
Matthews, Jonathan	1202	Phillips, Alexandra	1200, 1400, 500
Matthews, Laurie	1202	Pitblado, Nancy	1300
Maxwell, Everett & Joyce	1501	Plagenz, Matt	1300, 1303, 1804
Maxwell, Scott	200	Ployhar, Marilyn	1304
Mayernik, Stephen	201	Poston, Kathy & Rik	1110
McCollum, James	1006, 201	Prado, Sheila	1501
McKenna, John	1110	Prill, Dan & Margie	1110
McKenna, Tricia	1110	Rahr, Lee Lane	1202, 1601, 500
McKeown Jr., Robert	1110, 1203	Rahr, William	1200, 1201, 1206, 1400, 1601, 501
McMicking, Ron	1502	Rahr Lane, Christina	1102
Mercer, Colleen	1100, 1400	Rappe, Gerald	1202
Messing, Bill	500	Reavey, Richard	1000, 1300, 300
Miller, Joan	1100, 1109, 1110, 1201, 1304, 1601, 1804, 501	Reed	1106, 1300, 1304, 1502, 201
Mitchell, James L.	1100, 1109, 1800	Reynolds, Robert	1203, 1300, 1500, 1801, 1803, 200
		Reynolds, T.J.	1110
		Rigoni, Herb	1110

Ringling, Rock	1206	Sullivan, Sharmon	900
Rioux, Virgil	1108	Swan, Greg	200
Russell, Alex	1501, 1800	Swanson, John R.	1100, 200
Russell, Jay	1102, 1300	Teig Jr., Ronald E.	1101, 1102
Salina, Jo Hall	1300	Thompson, Jack	1106, 300
Sasaki, Emi	301	Kuether, Charles	1202
Schieffelbein, John	1303	Tighe, Dennis	100, 1003, 1004,
Schilling, Lesley	1101, 1106, 1304,		1006, 1101, 1107,
	200		1108, 1110, 1111,
Schilling, Kenneth	1106, 1300, 1304,		1203, 1303, 1304,
	1500		1400, 1501, 1601,
Schwery, Duane & Kathleen,	1501		1700, 1800, 1804,
Shaulis, Ira	1501		500, 600
Sidders, Michael E.	1110	Todd, Michael	1110, 1300, 302
Silence, Charles	1304	Treis, Bruce	1000, 1102, 1106,
Silence, Rhonda	1304, 201		1300, 501
Smith, Duane	1000	Tucek, Paul	1500, 200
Smith, Galen	1000	Ulias, John	1006, 1101, 1502,
Smith, Scott Friskies & Jennifer	1005, 1601		200
Smith, Loren	1110	Van Alstyne, Mark & Jill	1000, 1005, 1304
Sparhawk, Ryan	1000, 1005	Van Tighem, David	1000, 1005, 1106,
Stearns, Dave	1111, 1203, 1400,		1108, 1200, 1304,
	400, 501		1304, 1501, 1502,
Stefanson, Valdi	1000		301
Steinmuller, David & Patti	1100	Van Vynck, John	1303
Stephens, Paul	1202, 1300	Warr, MD, Thomas A.	1800, 200
Stevenson, Sarah & Richard	1303, 1502, 301,	Watkins, Len	1601
	302, 400	Weber, Byron	100, 1501
Stewart, Shayne	1110	Weil, Richard	200, 201
Stobbe, Pete & Athlene	1102	Williams, Michael	1303
Strand, Myron	1110	Witham, Mark & Kay	1106, 1502, 1800,
Strause, M. Fay & Howard	1303, 1601		201
Streich, John	1102, 1103	Zell, Zane	1100
Stuver, David	1303, 900		

**INDIVIDUAL and ORGANIZATION NAMES  
SUBMITTING COMMENT LETTERS ON DEIS  
With No Substantive Comments noted during Content Analysis**

Abbott, Doug	Carpenter, T. W.	Gebo, Keith
Aceto, Lynn	Casteel, Carol & Allen	Gibson, Scott Bischke & Katie
Adolph, Rick and Debi	Cerasaro, Shelley	Giger, Mr.
Ainsworth, Jeremy	Chaffee, Jr., Richard J.	Gillette, Robert
Albertson, Joyce	Chase, Dr. Alston	Granor, Paul
Alderson, George & Francis	Christopher, Suzanne	Gray, Jeff
Experiment Aircraft Association	Chwala, Tom	Greene, Martha Vogt & James
Anderson, Kathleen	Clark, Richard & Dorothy	Gregovich, Gayle
Anderson, Ted	Clewley, Brian	Griffin, Jeff & Sharon
Angell, Joe	Cochran, Beth	Hackman, Charles
Annis, George and Dolly	Coe, Mary	Haggerty, Jim
Attinson, Charlie	Colvin, Susan L.	Haggerty, Nancy Leary
Bailey, Joan	Combs, Jim	Hahn, Greg
Baines, Glenda	Condra, Robert	Halama, Steven
Baker, Dawn	Council, Paul	Halbe, Sherrill
Monarch Area Com. Assoc, Baker, D.	Covert Family	Halko, Pat & Ryan
Barcroft, David & Sharon	Crete, Ron	Halko, Taylor
Barnard, Larry	Croff, Thomas	Hancock, Stacey
Barnard, Grant	Darko, Pat	Handl, Steven
Barry, Jane and Walter	Davis, Bob	Hanou, Thomas
Bateman, Guy Dean	Davis, Doyle	Hardiman, Lisa
Bateman, Joe	De Roche, Timothy	Harmon, Ronald
Baumgardner, Ty	Deaton, Doug	Harpine, Royal
Beerman, Sanna	DeGroot, Richard	Hashley, Jane
Benard, Bonnie	DeVries, Johanna	Hastings, Candace
Bergstedt, Brad	Dickenson, Bob & Sue	Haverlandt, Carol
Betts, Diana	Doering, Chuck	Headrick, Roger
Black, Thomas and Mike	Dolman, Aart	Heckel, Jim
Blackler, Edd	Duncan, Angela	Heinbaugh, Monika
Blalack, Russell	Duncan, Janet	Helvey, Pat
Blamey, Aucille	Duncan, Jere	Henry, Jason
Blanding, Teresa	Easton, Lisa	Herzberg, Janet Gale & Rand
Bliss, Eric and Julie	Egan, Corby	Hether, Nicholas
Boland, Will	Ellerman, Edward	Hiaring, Robert
Bonini, Louis	Elliot, Alan	Hicks, Steve
Booth, James	Elmer, D. Grismer & Nancy	Highfill, Darrin
Borge, Lillian	Engler, Gail	Hill, Barry
Borgreen, Jim	Evans, JoAnn	Hillman, Jamie
Bortner, Gary	Evans, Dinda	Hines, Brian
Bralley, Jim	Exley, M.D., Jack	Hjortsburg, Mariah
Breeden, Raegen	Feist, Carole	Holm, Shawn & Katie
Breeding, Roger & Noreen	Flint, M.D., Kendall	Holton, George
Brenna, Jim	Foran, Ken	Hoyer, Bruce & Matt
Broberg, Richard	Ford, Michael	Hudson, Jon & Berkley
Brossard, Shannon	Forehand, Dick	Hughes, Michael
Browning, Aaron	Forstenzer, Rob	Hurlbut, John
Brueland, Kirk	Fox, Ed & Lorna	Hurlbut, Michael
Buckley, Muriel	Freeman, Raymond & Mary Ann	Husemoller, Tom
Buley, Sara	Frigaard, Bob & Lorene	Jack, Gene & Patricia
Bump, Dr. Thomas	Fuhrmann, Tia	Jennings, Peter
Burton	Furshong, Gabniel	Jensen, Kenneth C.
Calhoun, Janet	Fuselier, Marilyn	Jochem, Nancy, Dan, Miles & Emily
Cameron, James	Gans, Marcia	Johansen, Martin
Campbell, Mary	Garvey, Lydia	Johnson, Jeremy
Carlson, Betty		

Johnson, Martin  
Judith Basin Back Country Horsemen  
Johnston, Bob  
Jones, Llew  
Idaho ATV Association; Jones, W.  
Judd, Floyd  
Kammerer, Ed  
Katzenberger, Tami  
Keaveny, Theresa  
Kelly, Bob  
Kendy, Eloise  
Kenney, Matthew  
Kerkes, Brandon  
Kilmer, Judy  
Kinzli, Ernest and Diane  
Kitchenmaster, Donald  
Klarich, David  
Knaphus, Kristopher & Kathleen  
Knight, Mr. & Mrs. W.R.  
Knowles, Randall  
Konesky, Stephen  
Kraus, Jim  
Krebsbach, Eugene  
Kron, Bruce  
Kuether, Charles  
Landis, Connie  
Lane, Arlie  
Lane, Greg  
LaPierre, John  
Larosche, Ed  
Larson, Jim  
Leckner, Richard  
Lederman, Bonnie  
Lee, Ron  
Lee, Charles  
Lee, Karole  
Lehnherr, David  
Levens, Harold  
Levonas, Michael & Audrey  
Lewis, Cathy  
Liscum, Kelly  
Little, Kyle  
Littlepage, Dean  
Lloyd, Drake Barton & Kathy  
Loomis, Clint  
Luoma, Keith  
LUOMA, KENT  
Luttrell, Mark  
MacPherson, Jeanne  
Madgic, Jennifer  
Mainwaring, Sarah  
Mainwarinl, Nathaniel  
Makara, Mike  
Mall, Jeff  
Manalon, Crystal  
Mancell, Brian  
Manley-Cozzie, Teri  
Mari, Dave & Arlene  
The Wild Foundation; Martin, Vance  
Mathsen, Ron

Matoon Jr., Robert  
Mavencomp, Karl  
McCormick, Sherman & Sandra  
McIver, Jim  
McMillan, Lloyd & Patty  
Meek, Barbara  
Merriam, Ted  
Michaelson, Nancy  
Mikeson, Jeff  
Miller, M.A.  
Miller, Todd  
Moore, Steve  
Morgan, John  
Morgan, Matthew & Joyce  
Morrison, Mary Lou  
Mowbray, Carmine  
Munro, Molly  
Murray, Mike  
Myers, David  
Nack-Culbreth, Heather  
Navarro, Kim  
Nicholson, Robert  
Nicholson, Mary  
Noel, Bob  
O'Connor, Susanne  
O'Connor, Roy  
O'Dell, Robert  
Orham, Harlan & Patricia  
Treasure State Alliance, Inc.;  
Osterman, Craig S.  
Oswood, Bryan  
Pankrutz, Bill  
Parisi, LeeAnn  
Pasichnyk, Mike  
Paulick, Mary Lou  
Peigneux, Michael  
C.R. Backcountry Horsemen;  
Peppenger, Dennis  
The Montana Land Reliance; Phelps, C  
Philips, Earl  
Pike, Richard  
Ployhar, James  
Plumb, Chris  
Poett, Cynthia  
Rahr, Laurie  
Riordan, Donald  
Russell, Todd  
Ryshavy, Joan  
Sample, Michael  
Sampley M.D., H. Russell  
Bureau of Land Mgmt.; Sanders, Rod  
Saucier, Jerome  
Sautno, Bill  
Scalia III, Joseph  
Schaub, David  
Schlecht, Barb  
Schmidt, Eric  
Schwantes, Mark & Rod  
Scott, Edward & Jeanne  
Seaman, Jon

Seidman, Peter  
Sem, Steve  
Sentz, Gene  
Service, Conrad  
Setter, Marian  
Shelden, Jeff  
Sherman, Roger & Susan  
Shores, Karen, Eric and Ann  
Siebel, Gonnie  
Silan, Colleen  
Slevin, Mike J.  
Smith, Rita & Steve  
Smith, Tyler  
Snell, Donald  
Splain, Robert & Kimberly  
Stark, Tom  
Starshine  
Stewart, Cheryl  
Straus, Laura  
Streich, Ryan  
Stroebe, Robert  
Sutherland, Shari  
Talcott, Diana  
Thompson, Gordon  
Tomaszewski, M.D., Nina  
Tuss, Darrell  
Van Arsdale, Gary  
Van Hyning, Dyrck  
Vidic, Louis  
Virgin, Sharon  
Voight, Diane  
Wagman, Pat  
Walden, Shannon  
Waldner, Mike  
Walker, Sandy  
Walter, Michael  
Walton, Dick  
Ward, Dustin  
Ward, Randy & Cory  
Webster, Margaret  
Weeks, Thomas L.  
Weil, Ronnie Ferderer & Amanda  
Westphal, Bruce  
Wheeler, Gregg  
Whirry, Gordon & Janet  
White, Dale  
Whitman, Rick  
Wilfong, Donald V.  
Williams, John  
Williams, Anna  
Wilsey, David  
Winestine, Zachary  
Winslow, Gordon  
Winslow, Larry  
Wise, Earle  
Woods, Tom  
Yancy, Keith  
Yellow Robe, Joe  
Young, Carson  
Zarr, Ron

## RESPONSE TO COMMENTS

What follows are individual or summarized comments for each of the subject codes identified through the content analysis process, as well as the response to those comments. If numerous similar comments were received on a topic, they were summarized into a single comment.

The response to comments may be a direct response to the comment, or will note whether the comment was addressed by adding analysis or discussion to the FEIS.

### AIR COMMENTS/RESPONSES

<i>Subject Code:</i> AIR	<i>Category Code:</i> 100 - Air quality comments
<p><b>Letter #:</b> 378</p>	<p>EIS is deficient in its consideration of CO2 emissions, that will be permitted under any of the various alternatives. Type of vehicles (ATV's, snow mobiles, etc.) that are to be permitted are high contributors to air pollution, when compared to automobiles. The EIS fails to adequately consider the impact of such increased vehicle emissions on the National Forest areas.</p>
<p>635</p>	<p>With respect to both the winter and summer travel plans, pollution from machines must be addressed but is completely ignored in the DEIS. Oil spills from these machines and hydrocarbons in amounts greater than automobiles spew from exhaust. Creek crossings are impaired. How much air pollution do these machines cause and how does it affect the visual resource?</p>
<p>42</p>	<p>We didn't see analysis and discussion of potential air quality effects associated with travel management, but we recommend that the FEIS identify Travel Plan consistency with NAAQS and other applicable air quality requirements.</p> <p>If there are heavily used trailheads with large numbers of snowmobiles where stable air is present, the Forest should consider placing signs or implementing patrols on heavy use mornings to encourage users to limit idling time. The EPA also encourages use of the newer less polluting 4-stroke engine snowmobiles.</p>
<p><b><u>Summarized Comment:</u></b> General concerns about the emissions caused by recreational use of OHVs and snowmobiles, and the potential to affect air quality.</p>	
<p><b><u>Response:</u></b> A discussion regarding recreational vehicle emissions was not included in the DEIS as the direct, indirect and cumulative effects were determined to be minimal and not subject to in-depth analysis. A specialist report was prepared incorporating the best available information associated with recreational vehicle emissions from studies conducted in Yellowstone National Park, and incorporating information from the Environmental Protection Agency, and Montana Department of Environmental Quality. This air quality analysis also examined area weather and meteorology and any potential for recreational travel to cause or contribute to violations of National or State Ambient Air Quality Standards, degrade air quality by more than any applicable PSD (Prevention of Significant Deterioration) increment, affect Class I areas, or cause or contribute to visibility impairment beyond any existing conditions. The full specialist report is located in the Project File residing at the Forest Supervisor's Office, Great Falls, MT.</p>	
<p><b><u>Recreational Vehicle Emissions:</u></b> Concern was raised over the potential effects of motorized uses on air quality. This issue has been determined to be non-significant to the decision among travel plan alternatives. Public comment represents concerns about the undesirable effect of encountering motorized use emissions on Forest roads and trails year-round. The Forest Service acknowledges that odor generated by combustion engines, particularly two-cycle engines, can diminish a non-motorized user's experience of Forest trails. However, this is a recreation (user satisfaction) issue rather than a general air quality issue. Air Quality is not significantly affected by potential motorized use of Forest roads and trails under any of the alternatives.</p>	
<p>Vehicle emissions in the analysis area are most concentrated along secondary Highways 12, 87, 89, and 191 closest to or within the analysis area. The Forest does not have jurisdiction on vehicle use levels or emissions in any of these concentrated motorized use areas. Recreation motorized use and</p>	

emissions in the analysis area are more localized to roads and motorized trails, with generally sufficient wind dispersion to avoid air quality concerns. The EPA has set standards for emissions of nonroad engines and vehicles (snowmobiles, ATVs, boats, etc). The standards set for emissions of oxides of nitrogen (NO<sub>x</sub>), hydrocarbons (HC), and carbon monoxide (CO) are to ensure compliance with the CAA, and to regulate those emissions that contribute significantly to the formation of ozone and carbon monoxide. Compliance with these standards requires manufacturers to apply existing gasoline or diesel engine technologies to varying degrees, depending on the type of engine (US EPA, 2002).

Because the occurrence of inversion is more likely during the winter months, snowmobile and vehicle emissions might be more concentrated in parking areas and trailheads. Kings Hill, near Monarch, MT lies within the analysis area, and is a very popular snowmobile use area during the winter months. As a comparison, the West Entrance of Yellowstone National Park has been an area of considerable discussion relative to air quality effects from snowmobiles. The National Park Service provides information that indicates snowmobiles have a much higher per vehicle emission rate than autos and trucks. Monitoring in 1999 documented carbon monoxide (CO) and particulate matter concentrations at the West Entrance, which were very close to violation of the CO one-hour and eight-hour NAAQS. Measured concentrations were less at Madison and Old Faithful. Modeling various alternatives of winter use at the West Entrance, found that none of the alternatives for winter use management in Yellowstone Park would exceed one-hour average CO concentrations for NAAQS or MAAQS, although CO concentrations would be elevated considerably above background levels (National Park Service, 2002).

Direct and indirect effects of vehicle emissions on air quality do not result in measurable variations from current conditions, since emissions from recreational vehicles (cars, trucks, ATVs, snowmobiles, motorbikes, etc) are spread over much of the project area with generally good emission dispersion. No direct exceedances of NAAQS or MAAQS from dispersed motorized travel (including snowmobile use in winter) within the analysis area would be expected.

While snowmobiles produce nuisance emissions that are objectionable to some non-motorized users, the Kings Hill area receives much less use than West Yellowstone. By comparison, monitoring of snowmobile emissions at West Yellowstone indicated no exceedances of NAAQS or MAAQS, it is reasonable to expect that there would be no exceedances in a better ventilated, lower use, Kings Hill area.

Cumulative effects of motorized travel on air resources are unique in that past impacts to air quality are not usually evident. The emissions associated with motorized travel would be cumulative only with local emission sources described in the affected environment. Since motorized emission sources in the project area are localized and transient, actual cumulative combinations of emissions are minor and do not result in significant effects.

**Terrestrial and Aquatic Life and Habitats:** Only minor effects on terrestrial life would be expected as a result of the proposed travel management adjustments, such as actual site disturbance from soil displacement caused by vehicle or pack-stock travel, or from pollutant deposition into the atmosphere from vehicle exhaust.

Impacts on aquatic life would also be minor both in ground-level soil disturbance and vehicle exhaust with only minor amounts of water surface area exposed to airborne contamination or by deposition (Habeck, 2005).

**ALTERNATIVES COMMENTS/RESPONSES**

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of alternatives.</b>
<b>Letter #:</b> 42	We note that the Lewis & Clark NF will need to evaluate and analyze the impacts (e.g., watershed and water quality, wildlife impacts) of disclosure, and to allow the decision maker to make a reasoned choice between alternatives.	
8	<p>The existing level of motorized access and recreation was dismissed without adequate consideration because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.</p> <p>To date, educational measures have not been adequately considered, evaluated or implemented. We request that educational measures be incorporated as part of this proposed action and that the cumulative negative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities be addressed.</p>	
22	We feel that seasonal closures should not be a part of any travel plan. Seasonal closures are a management of local and changing conditions which should be addressed as problems are presented.	
134	Wheeled and winged motorized access should be allowed through the year on existing primary roads (and designated airstrips) to allow for trailhead access. Restricting this to only a portion of the year is unnecessary and limits the recreational opportunities.	
<b><u>Summarized Comment:</u></b> There was general concern about the array of effects analyzed in the DEIS.		
<p><b><u>Response:</u></b> The purpose of the EIS is to evaluate and analyze the impacts so that the decision maker may make a reasoned choice between the alternatives and different portions of different alternatives.</p> <p>We agree that education is important for implementing any decision. However, education is not an issue that will be fully analyzed as the purpose of the proposed action is to designate which routes will be open to which type(s) of use.</p> <p>We designated seasons of use to protect certain resources while continuing to allow motorized access. Seasonal closures are for management of local and changing conditions. We will monitor these seasonal closures and change them should they not be working effectively to accomplish their intended purpose. As an example, should the seasonal closures during bow season not work as desired, we will consider changing the time period. Changing or removing a seasonal closure will not require undertaking a new travel planning effort.</p> <p>Primary roads are open year round. However, during part of the year they are inaccessible to wheeled vehicles due to snow. During those times of year, they are open to over-snow vehicles. In fact, a number of primary routes have groomed snowmobile trails on them during the winter. Designated airstrips may not be seasonally restricted, however, it is unlikely that airstrips would be used when snow covered.</p>		

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Range of alternatives for motorized use.</b>
<b>Letter #:</b> 6	The FS failed to provide an Alternative that maximizes motorized recreational use on the forests. Please create an alternative that does not reduce motorized vehicle access or any trail mileage.	
38	An alternative to increase opportunities for this majority was never brought to the public for review and comment. As a "Travel Plan", the increased use and opportunities should be recognized as a proper use of the National Forest and an alternative should have been provided showing increase opportunities for motorized recreation.	
5	The planning team should ensure there is adequate opportunity "to meet present and future demands." This is a major flaw in the DEIS. The agency must supplement the analysis (prepare a Supplemental Environmental Impact Statement) and formulate an alternative that addresses the increasing demand for recreational opportunities.	

119, 153, 292, 359	Please create an alternative that at least doesn't reduce motorized vehicle trail mileage.
140	With the amount of motorized use increasing every year, opening more trails to ATV and motorcycle use would disperse them over a greater area, thereby relieving pressure on the whole system.
<b><u>Summarized Comment:</u></b> Some people suggested developing an alternative that increased opportunities for motorized recreation.	
<b><u>Response:</u></b> The “no-action” alternative (Alt. #1) does not reduce motorized vehicle access or any trail mileage. Alternative 3 was provided by representatives of the motorized users to maximize motorized recreational opportunities on the Forest.	
<p>The National Environmental Policy Act (NEPA) directs us to analyze a range of reasonable alternatives when we are making a decision. Alternative 1 does not reduce motorized vehicle trail mileage and Alternative 3 looks at improving motorized access on the Forest. We realize that the demand for motorized recreation may continue to increase in the future. However, the Forest is a finite resource with other valid resources, users and uses – some of which limit the amount of motorized recreation that can be accommodated. We are seeking to improve the motorized recreational opportunity while meeting the requirements of other resources, users and uses.</p> <p>The suggestion to spread motorized use across the Forest has merit and we attempted to do so. However, we will not be able to provide all of the opportunities for all users and all uses.</p>	

<b><i>Subject Code: ALTERNATIVES</i></b>		<b><i>Category Code: 200 – Range of alternatives for airstrips.</i></b>
<b><i>Letter #:</i></b> 31	<p>there is another airstrip that could be used in the Lost Fork that is behind the helicopter shown in Figure 1. The airstrip is in a park on the south side of the river and is actually better than the area shown in Figure 1. This airstrip became unusable to most aircraft when the USFS put a fence across the middle of it a number of years ago. Could this fence be re-routed?</p> <p>no action alternative, indicates there are no airstrips in this alternative. We disagree because the Middle Fork Airstrip and the Lost Fork Airstrip are there now. They are capable of being used now. The DEIS indicates the airstrips are closed but no backup documentation indicating closure has been presented. Also, the use of the Middle Fork Airstrip and the Lost Fork Airstrips before the area was a WSA can be documented.</p> <p>In the case of the Little Belt Mountains, since most suitable airstrip locations are within grazing allotments, there must be a choice of where to land an aircraft. This is because aircraft cannot be left unattended when there are livestock present in the area. Cows are curious animals and will investigate unfamiliar objects. Aircraft can serve as good rubbing posts, and the aircraft could quickly become heavily damaged.</p>	
31	<p>Holiday Camp: there really isn't enough room at the trailhead campground location to locate an airstrip. An airstrip at this location could also cause conflicts between landing and takeoff aircraft and livestock. We selected a park about one-quarter of a mile to the south of the trailhead for the airstrip.</p>	
477	<p>Public use airstrips should be located only near forest boundaries (either public or private lands.) or close airstrips during big game hunting seasons (no public use Sept. 1st to Dec 1st).</p>	
<b><u>Summarized Comment:</u></b> Some people offered suggestions to modify alternatives involving airstrips.		
<b><u>Response:</u></b> The Forest Service has no knowledge or records such as topographical maps or District maps that indicate an air strip existed in the Lost Fork. Fences on NFS lands in this area are for Allotment Boundaries or pasture designation. Some minor adjustments to locations of these fences may occur, but large deviations would require in depth analysis (NEPA process for change in Allotment Management Plan).		
<p>The Middle Fork airstrip is located on private land. The Forest Service has no jurisdiction over the use of this airstrip. Areas outside of this location are restricted to motorized access including aircraft.</p>		

It would be up to a pilot whether or not their plane would be left unattended, just as any other forest user would make a decision to leave their vehicle or belongings unattended.

The different alternatives consider airstrips differently. The decision will take into account the various resource and public concerns, such as conflicts with livestock, use during big game hunting seasons, proximity to private land, and proximity to the Forest Service boundary.

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of alternatives.</b>
<b>Letter #:</b> 19	We recommend a new trail segment to connect east/west trail opportunities. A short connector from Road 3412 (O'Brien Park) to the US Hwy 89, junction with road 267 f would connect east and west riding opportunities and make the camping area at Chamberlain road a main staging area for OHV use. proposed a trail in the O'Brien Creek Drainage. We are requesting an objective evaluation of the proposed trail taking into the consideration the potential of a collaborative group that could adopt the trail, secure funding for 8-10 bridges and maintain the trail for multiple users, motorized and non-motorized, both summer and winter. We request that the Forest service pursue obtaining easements for public access across the private land in the Middle Fork. If easements across the private land in the Middle Fork of the Judith are not attainable, trails around the private land should be developed. None of the alternatives addressed the growing need for additional OHV opportunities. The majority of the public visiting the areas understand the future 'need' for more motorized access and motorized recreational opportunities. The DEIS didn't examine, address or consider increasing the level of motorized access. The DEIS should have considered a future that includes an increased need for motorized access.	
2	The closures on road 6558 and associated spur road should be included in all alts and these should be considered for removal and restoration. There are numerous stream crossings on road 825 and it should be kept closed in all alternatives. The FS should consider removal or relocation of this road.	
264	In the Crazy Mountains on road 66 there are two closure gates (see enclosed map) used in the spring of the year to protect road 66 when wet conditions make the roadbed soft. These gates have never been part of a travel plan and now would be a good time to include them in travel management planning. It would be best to mange these gates based on the condition of road 66 not specific dates as soft roadbed conditions vary from year to year.	
318	Alternative one with a few minor changes this should be the preferred. Provide for non-motorized use on the Mizapah Trail using the outer edges of the ridge as a natural barrier. Provide for non-motorized use on the Dead Man Trail using the outer edges of the ridge as a natural barrier. Provide for non-motorized use in the Bottom of the Jefferson Creek drainage using the valley floor as a natural barrier.	
325	Alt 3 with the following modifications to trail bikes open trail 419, Snow Creek until Oct 15 open 422,433,404 Lost Fork of the Judith open 342 Tenderfoot 344 Taylor Hills 342 Lost stove.	
412	I would like to speak in favor of alternative 1 with the following changes: Allow non-motorized use on the Mizpah Trail utilizing the outer edges of the ridge as a natural boundary. Allow non-motorized use on the Dead Man Trail utilizing the outer edges of the ridge as a natural boundary. Allow non-motorized us in the bottom of the Jefferson Creek drainage utilizing the valley floor as a natural boundary. Add a groomed snowmobile trail form Jefferson Bowl east towards Tepee on road 251 east for approximately 1.5 miles. Add the additional trails included in alternative 3.	
425	Tobin Trail 315 open to mcs, the Trail 304 from above Belt creek put as horse trail only. Let motorized travel go from where these two trails intersect. To the top end of Pilgrim Creek Trailhead, close the trail 336 to motorized travel and keep this large area for horsemen. This would give both parties usage of Pilgrim Creek Drainage. I suggest you close the tenderfoot trail from Onion Park to where Taylor Hills trail intersects to motorized travel.	
431	Alternative 5 suggested changes: The Forest Service has done nothing to provide reasonably accessible non-motorized trails for local families and tourists. Hoover Creek and Pioneer Ridge are perfect for this purpose. Lower Tenderfoot did not have motorized use until recently.	
433	1. Ensure that trail #342 in the Tenderfoot drainage remains closed to ATVs. 2. Road #6426 in the Tenderfoot drainage is poorly maintained and contributes to illegal ATV	

	<p>use on trail #342. It should be closed under all alternatives.</p> <p>3. The South Fork of the Judith is a Water Quality limited stream. Trails #439 and #440 should remain closed under all alternatives to protect the drainage's westslope cutthroat trout population.</p> <p>4. The Middle Fork of the Judith is one of the largest roadless areas in the area. Trails #436, #437 and #439 should remain closed in all alternatives.</p> <p>5. Recommending no motorize use in Pilgrim Creek. Probably the most unspoiled area reaming of the Little Belts.</p>
443	I support alt 5 except the closure of the Mizpah trail (to ATVs) please reconsider that trail closure. I have taken family and friend over that trail past the fire tower lookout to Ranch Creek. It is one of the most beautiful trails up there. A snowmobile is needed down to Neihart, destination to have lunch etc. will help local businesses.
577	Some further suggestions: In the Little Belt, allow non-motorized use on the Mizpah Trail utilizing the outer edges of the ridge as a natural boundary, allow non-motorized use on the Dead Man Trail utilizing the outer edges of the ridge as a natural boundary, Allow non-motorized use in the bottom of the Jefferson Creek drainage utilizing the valley floor as a natural boundary, add a groomed snowmobile trail from Jefferson Bowl east towards Tepee on road 251 east for approximately 1.5 miles, add the additional groomed trails included in alternative 3, cut out all large blocks and more define the trails for non-motorized use.
658	In the Carpenter Creek area, you should consider creating an open area. In section 14, 22, and 23. This would take advantage of many old mining roads, creating excellent environmentally friendly recreational and access opportunities.
662	Leave the Tobin Trail #315 open to Motorcycles, the trail #304 from above Belt Creek put as horse travel only. Let motorized travel go from where these two trails intersect to the top end of Pilgrim Creek Trail head, Close the trail #336 to motorized travel and keep this large area for the horseman.
628	I would support alternative 3 because it still allows for reasonable OHV use and creates new non-motorized trails. There are some modifications that need to be made to alt 3 such as: Middle Fork Judith 437 doesn't need a closure from 12/1-5/15. Rolfe Gulch # 0412 should be open to motorized as in alt 5 to create a loop system, the upper end of trail 609 should be open for trail bikes, at least during summer months. Remember that alternative 3 was proposed by a coalition of OHV riders, horsemen, 4x4 clubs, mountain bikers, and pilots. These people comprise the largest user group by far of this area. These groups also contribute greatly to our local economies by purchasing OHVs fuel, RVs, outdoor gear, food for outings license fees and taxes.
145	The existing trails on the north and south forks of Hoover Creek involve many creek crossings and the stream banks have been severely damaged by horse and motorcycle use. These trails should be kept in their current locations, but designated for hikers only. Non-motorized trails should be in 3 separate categories: 1) hikers only, 2) hikers and mountain bikes only, 3) hikers, mountain bikes and horses.
322	Create a new segment to connect road 3412 with road 267.
452	We need a loop trail in the Castle Mountains for ATV's that would include trails 718, V651, V652 and 618.
556	In the Little Belt, allow non-motorized use on the Mizpah Trail utilizing the outer edges of the ridge as a natural boundary, allow non-motorized use on the Dead Man Trail utilizing the outer edges of the ridge as a natural boundary, Allow non-motorized use in the bottom of the Jefferson Creek drainage utilizing the valley floor as a natural boundary, add a groomed snowmobile trail from Jefferson Bowl east towards Tepee on road 251 east for approx. 1.5 mi.
599	Please consider establishing parking areas and shelters. These amenities not only make the ATVing experience more enjoyable, it instills a sense of pride in local riders and a measure of respect in visiting riders.
<b><u>Summarized Comment:</u></b> A number of people suggested modifications to the various alternatives.	
<b><u>Response:</u></b> A new trail segment near US Hwy 89 (between roads 3412 and 267) was considered and analyzed in Alternative 3 of the Final Environmental Impact Statement.	
Bypass trails around private land in the Middle Fork were analyzed in Alternative 3. We will continue to encourage user groups to work with the landowners and the Forest Service to obtain easements from the landowners.	

Road 6558 is considered differently under different alternatives.

Road 825 is considered differently under the alternatives with one reason being the number of stream crossings. Private land is accessed by Road 825 and reasonable access must be considered.

We have the authority to close roads such as Road 66 in the Crazy Mtns. to protect the roadbed during wet conditions. Such closures will continue to be made under a separate subpart B order to maintain flexibility in managing recreational access and protecting resources.

Trail 419, 422, 433 and 404 are proposed as being open from December 2 through October 14 in Alternative 3. The Lost Fork Judith (trail 409) has been restricted to motorized use based on resource concerns for several years. The concerns are still valid. A portion of trail 409 is proposed as being open from December 2 through October 14 in Alternative 3 to allow for a connection with trails 422 and 433. Trails 404, 409, 419, 422 and 433 are treated differently in the other alternatives.

Several people suggested non-motorized use along the Mizpah ridge. This was evaluated under alternative #5.

We considered suggestions to allow horse and motorcycle use in the Pilgrim Creek area and evaluated them in the alternatives.

In seeking to balance recreational opportunities on the Forest, non-motorized, quiet recreation is emphasized on the Rocky Mountain Front with its large amounts of designated wilderness; while motorized recreation is emphasized in the Little Belts.

The lower Tenderfoot Creek landownership is mixed with private property so USFS law enforcement on these lands is limited. We agree with concerns for non-motorized use. Our decision for Trail #342 will be non-motorized. The trails will be closed to ATV and motorcycle use. Also, considering Road #6426, we will keep this closed to motorized use as well.

In response to wanting the same item in all alternatives on the Middle Fork, that is why we have alternatives – so that we can see the differences, analyze those differences and make a reasoned decision.

The Pilgrim Creek area is important to motorcycle users because of the loop opportunities it offers. Non-motorized users also like it because it is very near Great Falls and offers solitude and a wild experience. We understand why the non-motorized user would enjoy an opportunity close to Great Falls and the decision will include some trails open only to non-motorized uses in Pilgrim Creek. However, we also understand the loop opportunities it provides for motorcycle users. This is an area we believe can be shared and we have decided to implement a timeshare opportunity on some of the trails in Pilgrim Creek. Use of Trail #315, Trail #304 from its junction with Trail# 315 and Trail #305 will be alternated between non-motorized users as well as motorcycle users. The Belt Creek District Ranger working with the user groups will determine how best to implement this time share.

A snowmobile trail down to Neihart was analyzed in the Winter Alternative 2.

We have analyzed roads open to motorized vehicles in the Carpenter Creek area and these are included in the final decision. However, much of this area is private land and not subject to National Forest system travel management decisions.

Alternative 3 has Trail 437 open to non-motorized use year-long and does not show a restriction. Trail U412 is treated differently by the different alternatives.

We addressed existing water quality and fisheries issues in Hoover Creek area by closing portions of trail 732 and trail 735 to motorcycles and horse use. When the damage is corrected these portions may be re-opened to horse use if that use will not result in unacceptable resource conditions.

There will be an ATV route constructed to provide access to the area from Elk Peak down to Castle Lake (approximate alignment of U651). However, the proposed loop using Trail 718 and 618 will be closed to ATV use due to resource concerns. There will be an ATV loop opportunity in the Castles. This loop travels along the ridgeline portion of Trail 718 to Wapiti Peak and heads toward Fourmile Creek for a couple of miles on Trail 717 then intersects with Trail 725 to yield a short and beautiful ATV loop trip.

Unfortunately, with the shrinking budget, it is not practical to develop more facilities. We might consider a special use permit with an ATV group if they wished to develop and maintain a facility on the Forest. However, most of our permits like that are for temporary structures only.

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of WSA in alternatives.</b>
<b>Letter #:</b> 33	In the alternative, the USFS should: (1) carefully assess how the past, existing, and increase in, motorized routes, current levels and types of motorized use, airstrips, and technological advances in motorized forms of transportation (i.e., ATVs, motorcycles, and horse powered snowmobiles) impact the WSA's wilderness character; and (2) then adopt and implement a summer and winter alternative that ensures that the WSA's wilderness character is protected and restored as it existed in 1977.	
476	The Middle Fork of the Judith River should have a trail built for motorcycles and 4-wheelers out of the private lands and away from most of the creek crossings. If a goodwill easement could be obtained through the Middle Fork Ranch area then motorcycles could remain using the seven trails that travel through there.	
639	There can be a happy medium with just very few changes to alt 3. The Middle Fork of the Judith River has very limited trail access. I would support a road down Arch Coulee Trail to 424 if the rest of trail 825, from Arch Coulee Trail to private land, is open to everyone. You would need to connect the new ATV trail with the west side of the private land trail 8406, but there are several old logging roads around that area that this could be easily accomplished.	
313	The draft EIS does not analyze the economics of creating hard surface crossings on Middle Fork Creek. The draft also does not analyze the contribution of a cooperative resource group to cost share material and labor costs involved in creek crossing repair.	
<b>Summarized Comment:</b> Concerns and suggestions were made about effects of the alternatives on the Middle Fork Judith Wilderness Study Area.		
<b>Response:</b> The alternatives describe the effects on the wilderness characteristics of the WSA, and the final decision will incorporate measures to protect the values of the WSA.		
Alternative 3 proposes several routes bypassing the private land in the Middle Fork. We encourage the public to work with the private land owners to obtain a goodwill easement.		
The nature of stream function for the Middle Fork Judith does not make hard surface crossings a solution to meet resource objectives. Hard crossings may be viable if only a few were needed, but they would impact natural stream function with the numbers (25+) involved on the Middle Fork Judith. Middle Fork Judith has large flows/floods as part of natural function which would impact the location of each hard crossing and may make them useless on any given year. For these reasons, hard crossing did not meet objectives and were therefore not considered. We do encourage the idea of a cooperative resource group working on projects for resource benefit.		

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of Smith River corridor in alternatives.</b>
<b>Letter #:</b> 34	if the decision process leads to a motorized trail of any kind into the Smith River corridor, seasonal considerations would be a must. It would be totally inappropriate to have such a trail open during the float season which usually starts in May and ends before August 1. Additionally, these trails should be closed for motorized use during the big-game rifle and archery hunting seasons; this would again be very likely to cause friction between the motorized and non-motorized hunters as OHVs and ATVs have an unfair advantage over the non-motorized hunter compromise the hunting experience.	
282	<p>Blocking up the Tenderfoot Deep Creek roadless area, Pilgrim Creek roadless area and the Middle Fork of the Judith Wilderness Study Area would provide an opportunity for hikers and horseback riders to either follow a two or three-day loop trail or set up a base camp to hike or ride from in a primitive setting. Without large non-motorized blocks, the backcountry becomes just another drive-in with a diminished sense of remoteness, natural integrity, naturalness, and solitude.</p> <p>For summer use, I would urge the Lewis and Clark National Forest to adopt alternative 4 with some modifications. Priority areas include the Middle Fork of the Judith Wilderness Study Area, Tenderfoot Deep Creek roadless Area, Pilgrim Creek roadless area, Hoover Creek area and roadless areas in the Castle and north Crazy mountains. These areas are only a few of the 17 remaining roadless areas in these ranges. They are priorities because they are the last areas which have largely retained their wilderness character. The non-motorized areas identified under alternative 4 should be combined with the remainder of alternative 5. Combining these two alternatives would incorporate the best features of each alternative.</p>	
662	Leave the Tobin Trail #315 open to Motorcycles, the trail #304 from above Belt Creek put as horse travel only. Let motorized travel go from where these two trails intersect to the top end of Pilgrim Creek Trail head, Close the trail #336 to motorized travel and keep this large area for the horseman.	
<b>Summarized Comment:</b> Concerns were expressed about the Smith River corridor, as well as the Tenderfoot – Deep Creek area.		
<p><b>Response:</b> Our decision will restrict motorized access from the east across the National forest system lands during the floating season. We will provide an opportunity for motorcycles to access the river via a portion of trail #311 and forest road 263 after the floating season. The District Ranger will coordinate with FWP on when to open this trail to motorized access each year. I expect the opening dates for motorcycle use to generally vary between July 15 and August 1 each year. Since the priority objective is to provide a quality floating experience the dates may be later during high water flow years.</p> <p>Motorized users will have access in the eastern portion of the Deep Creek Park area. Access to the eastern portion of Deep Creek Park will provide a network of high quality motorcycle trail opportunities. Four-wheelers will have access to the eastern edge of Deep Creek Park on trail 338 and a portion of trail 316. This decision will provide access to the area during hunting season to respond to FWP’s request for hunter access. This hunter access on public land is intended to increase elk harvest and by doing so reduce elk wintering on private lands north of the National Forest system lands. This access will also help balance the public’s access with that of adjacent landowners and permitted outfitters.</p> <p>In seeking to balance recreational opportunities on the Forest, non-motorized, quiet recreation is emphasized on the Rocky Mountain Front with its large amounts of designated wilderness while motorized recreation is emphasized in the Little Belts. The final decision does provide for additional quiet recreation in the Middle Fork of the Judith WSA, the east end of the Crazy Mountains, the northwest end of the Little Belts around Deep Creek and the Smith River and part of the Pilgrim Creek drainage.</p> <p>At this time we have decided on no new trail construction in the Deep Creek Area. We understand your concerns about Trail 338. We are trying to address the safety and resource issues through</p>		

another approach. Currently, we have on our Trails Capitol Investment Plan Trail 338 for fiscal year 2010 for reconstruction. We appreciate your concern about this specific trail and we are working toward a solution.

**Subject Code:** ALTERNATIVES      **Category Code:** 200 – Evaluation of alternatives.

**Letter #:** 27      FWP would like to see the number of seasonal road restrictions in the Travel Plan consolidated and decreased to four or less.

**Response:** We intend to consolidate and reduce the number of seasonal closures as much as possible in the final decision. A final map for the public will definitely have a consolidated list, but will show the dates as when routes will be open.

**Subject Code:** ALTERNATIVES      **Category Code:** 200 – Evaluation of alternatives.

**Letter #:** 221      I propose Alternative 3 by the FS seems to be a hastily thrown together alternative. I believe if the wolverine areas, based on bad science were eliminated the alternative might be acceptable.

557      The proposed Alternate 3 by the FS seems to be a hastily thrown together alternative. I believe if the wolverine areas, based on bad science and what if scenarios were eliminated the alternative might be acceptable, it hard to decipher from the documents the real reasons for any over snow closure. I would suggest the alternative be revised without the unproven claims about wolverine and lynx with consideration of know requirement such as elk and deer winter range.

**Summarized Comment:** Concerns were expressed about the wolverine habitat needs shown in Winter Alternative 3.

**Response:** Winter Alternative 3 was designed to show wildlife habitat concerns.

**Subject Code:** ALTERNATIVES      **Category Code:** 200 – Range of alternatives for quiet areas.

**Letter #:** 234      After reading the Draft EIS for the Jefferson District of the Lewis and Clark National Forest, I ask, "Where is the conservation alternative?" Summer and Winter Alternative 3 are extraordinarily unbalanced and pretty much give the forest away to motorized users. Summer Alternative 5 is slightly better, but it still is extremely unbalanced in the meager provision of opportunities for quiet recreation. Why isn't there a conservation alternative - one that protects the land from abuse, protects wildlife habitat, and keeps our forest wild and pristine? By not providing a full spectrum, you make the spectrum range from compromise to extreme degradation. I fail to see how you serve the American public by considering extreme degradation while not considering extreme protection. Summer Alternative #4 and-Winter Alternative #2 are the only-alternatives that recognize that there is a real and significant conflict of interest between motorized users and quiet recreationists. Despite the rhetoric of motorists, when there are ATVs, dirt bikes and other vehicles on the trail, it ruins the experience for people seeking traditional and Quiet forms of recreation!

286      Spike, earlier in this travel plan process, you had indicated receptiveness to more than one "large block" of non motorized use. The current preferred plan with only one such area is fatally deficient. USFS is not adequately doing its full scope of review. It seems to be giving priority to motorized recreational use, based on a majority preference among current commentators on the plan. USFS should also be an advocate for the preservation and protection of the resource it manages for the long term. The only way that will occur is to adopt a plan that scatters large blocks of non motorized units throughout the Jefferson Division. Alternative 4 is that vehicle.

161      My suggestion for the travel plan would be to ban all motorized use until the motorized users repair the damage their goup has created, and then allow motorized use on a limited basis, and if further damage occurs, shut off motorized use again.

395      I would also urge you to keep Silver Crest Cross Country Ski Area as a year-round closure to motorized use.

**Summarized Comment:** Some people felt that non-motorized uses were not emphasized adequately in the alternatives.

**Response:** The National Environmental Policy Act (NEPA) directs us to analyze a range of reasonable alternatives when we are making a decision. Closing the Forest to motorized use is not a reasonable alternative, as motorized recreation is a valid use of the Forest. Summer Alternative 4

was provided by the Montana Wilderness Association as a reasonable alternative that provided for quiet areas. Alternative 5 looked at providing additional protections for wildlife and other resources. The final decision combines elements of both of these alternatives to protect resources and improve the potential for quiet recreation, as well as seeking to improve some of the motorized recreational opportunities.

In the final decision, we have closed certain routes where damage is occurring with the proviso that when the routes have been fixed, use may be re-instated. One such example is the lower end of Daisy Dean (Trail 619). The motorized user groups have been and continue to work with us to improve the condition of the many trails on the Forest.

We are keeping Silver Crest Cross Country Ski Area closed to motorized use year-round.

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of alternatives.</b>
<b>Letter #:</b> 467	I do not think alternative 3 supports to the extent it should the needs of woodcutters and recreational access by those in automobiles and pickups. For instance the following roads above Neihart to the West are closed to all but ATVs and trail bikes. Roads 641, 6383 and other roads created by logging would no longer be open to firewood gathers with a pickup. I have used this area for firewood since 1975 and held a commercial wood cutting permit for several years off road 641. There is still a great abundance of firewood to get next to existing roads, however if any alternative except no. 1 is selected this would prevent firewood cutting in the area. There are many other woodcutting areas out there that would suffer the same fate.	
481	As a firewood permitted each year, I would like to see some provision included in any plan to either open certain system roads to firewood cutters for a limited time each summer or grant permission for firewood permittees to harvest firewood behind locked gates in areas where dead wood is abundant.	
<b>Summarized Comment:</b> Some people felt that the alternatives did not adequately address the need of firewood cutting.		
<b>Response:</b> Table II-1 in the Draft EIS displays the road miles by alternative. Firewood gathering is legal on all of these roads. In addition, special areas are set up for firewood gathering as necessary.		
Firewood cutting areas are opened as the need arises. As an example, one closed route in the Musselshell District was opened in the summer of 2006 to allow access. People desiring access to a specific area need to speak with the District Ranger about making it available temporarily.		

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of alternatives.</b>
<b>Letter #:</b> 629	May I urge that each of the following areas, with acres, be designated as wilderness, as these areas present outstanding biological, scenic and wilderness attributes of certain national significance: Tenderfoot / Deep Creek 144,000; Middle Fork Judith 115,000; Pilgrim Creek 64,000; Pain Gulch 11,000; Sawmill Gulch 17,000; Seaing Creek 25,000; TW Mountain 13,000; Big Baldy 59,000; Granite Mountain 15,000; Tollgate Sheep 34,000; Crazy Mountain 217,000; Mount High 45,000; Bluff Mountain 51,000; North Fork Smith 14,000; Big Snowies 142,000; Highwood 35,000; Highwood Baldy 22,000; Calf Creek 16,000; Eagle Peak 9,000; Castle Mountain 41,000; Box Canyon 22,000.	
<b>Response:</b> This suggestion is outside of the scope of this decision. This decision is only to designate which routes will be open to what types of motorized or non-motorized use. All Wilderness designations are made by Congress.		

<b>Subject Code: ALTERNATIVES</b>		<b>Category Code: 200 – Evaluation of alternatives.</b>
<b>Letter #:</b> 442	If there has to be areas closed, could it be for a certain time then switch areas so users of all types benefit? (i.e. Hoover Creek certain months motorized then non-motorized other months such as May to July, then July to September).	

678	Maybe another solution would be to actually "share" these trails- make certain days "quiet" days and others motorized use. That would combine trail usage.
8	A reasonable alternative for accomplishing this can be done by designating alternating weeks for motorized and non-motorized use. The schedule can be communicated to the public by signs at each end of the trail segments, newspaper articles, and through local user groups. This alternative eliminates any reasonable concern about conflict of users. There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists and does not adequately address the growing needs of motorized recreationists. The current evaluation and proposal does not adequately address these two issues. The current proposal does not accomplish what should be the supreme goals of this action and that is to meet the needs of motorized recreations both today and tomorrow.
<b><u>Summarized Comment:</u></b> Suggestions were made to alternate time periods between motorized and non-motorized uses.	
<b><u>Response:</u></b> We considered the suggestion of closing certain areas to certain uses for a certain time period, then switching areas and uses. Hoover Creek will not be managed like that, but Pilgrim Creek will be.	

<b><i>Subject Code: ALTERNATIVES</i></b>		<b><i>Category Code: 200 – Evaluation of S. Fk. Judith in the alternatives.</i></b>	
<b><i>Letter #:</i></b> 639	I believe that Hay Canyon Trail 456 should remain just a horse and motorcycle trail over the top. I don't think we need to have an ATV trail over Mount High to Haymaker Park as suggested in Alt 3, but the rest of the trails in Alternative 3 for the south fork trail area are good and need to remain as started in alt 3.		
641	Summer Alternative 3, 4, & 5 : All three alts have that same section leading to private property closed to motorized traffic yearlong. We would like to see the current conditions be incorporated into those three alts. We feel the road should be kept open. ATVs and motorcycles have passed through our property this year as well as in prior years. Our ass'n members have voted to let them pass through and access our roads to get to the main route of Memorial Way. The public has been respectful, hence, permission is granted by our associations to let the public, with permission, use our roads.		
282	Alternative 4 proposes to create an A TV trail into the South Fork of the Judith. This is one modification which should be incorporated into this alternative. The South Fork is an easily accessible and a popular camping and fishing area, but the river does not meet the state's water quality standards and it is one of the few areas in the state that supports genetically pure cutthroat trout. Continuing to allow vehicle use is inappropriate given the narrow canyon and the proximity of the trail to the stream.		
<b><u>Summarized Comment:</u></b> Concerns were expressed about how the alternatives addressed specific areas such as the South Fork Judith.			
<b><u>Response:</u></b> Specific trails and roads are treated differently in the different alternatives. Trail 456, as well as the Mount High to Haymaker Park trail, was proposed as an ATV trail in Alternative 3 to address the concern to have more loop trail riding opportunities in the Little Belt Mountains.  Alternative 1 shows the existing situation. The different alternatives treat the trails that could be accessed south of the private land (Trask Ranch area) differently. Because the documentation provided does not have signatures from all landowners involved, the alternatives propose routes that do not involve nor are they accessed from private land.  The South Fork Judith is addressed differently in the different Alternatives. Based on concerns for water quality and westslope cutthroat trout, as you point out, the final decision will restrict the South Fork Judith trail to hiking only.			

**ECONOMICS COMMENTS/RESPONSES**

<b>Subject Code: ECON</b>		<b>Category Code: 300 – General economic concerns.</b>	
<b>Letter #:</b> 8	The economic analysis presented in the DEIS significantly under-estimates the positive impact of motorized recreation on the local economies. The evaluation must include all of the associated costs required for a motorized visit on a per trip or per day basis. Motorized recreationists typically camp out in a RV and pull a trailer carrying their OHV vehicles. For example, all of the supporting cost should include the capital costs (including initial and depreciation) and operating costs (including maintenance, fuel, taxes, license and insurance)		
33	far greater economic contribution of public lands is there ability to keep and attract people to local communities People care about the area where they live and act on their preferences. often bringing with them retirement incomes and businesses.		
38	The economic impact study is weak at best. This study is lacking local interviews of dealers, hotels, restaurants and gas stations on the direct impact of motorized recreationists in their communities. By keeping the economic study broad, your agency has been able to dilute the "actual" economic significance of the OHV recreationists has on a rural community. It fails to provide site specific economies, at least at the county level on the relative impact of the hunter groups have on these economies.		
262	We have put tens of thousands of dollars into four wheelers and snowmobiles. We put thousands of dollars each year in gas and parts. We contribute a lot of money to our economy.		
<b>Summarized Comment:</b> The economic analysis presented in the DEIS significantly under-estimates the positive impact of motorized recreation on local economies.			
<b>Response:</b> The economic impact estimates for the Lewis and Clark National Forest are presented on pages 156 through 165 of DEIS for all recreation activities (i.e., motorized and non-motorized activities). The methods used to estimate the economic impacts for the DEIS followed the methods and procedures outlined in Alward et. al. 2003 and Stynes 2000.			
For the Jefferson Travel Plan the following information and model were used to estimate the economic impacts attributable to recreation activities on the Lewis and Clark National Forest:			
<ul style="list-style-type: none"> <li>• Recreation use estimates were derived from the Lewis and Clark National Forest, National Visitor Use Monitoring Survey (NVUM) (Kocis et. al. 2002). The Lewis and Clark NVUM survey provides an estimate of overall visitor use and estimates of the proportion of the use by various recreation visitor use activity types (e.g., OHV use, hiking, etc.).</li> <li>• Recreation trip-related expenditure per visit and type of use were derived from the NVUM survey. The trip-related expenditure by visitor use segments were derived by Stynes and White of Michigan State University using forest-level NVUM survey data (Stynes and White 2005). (Note: even though equipment-related expenditures are quite sizeable, typically they are not used to estimate economic impacts of recreation activities (see Stynes 2000).</li> <li>• An IMPLAN Pro economic impact model was used to estimate the jobs and labor income attributable to the trip-related recreation use and expenditures reported by the Lewis and Clark National Forest NVUM survey. IMPLAN Pro is the most widely used economic input-output model in the world, and has been used extensively to estimate economic impacts attributable to recreation activities (Stynes 2000 and Silberman 2002).</li> </ul>			

<b>Subject Code: ECON</b>		<b>Category Code: 300 – General economic concerns.</b>	
<b>Letter #:</b> 8	Models can be manipulated to predict any result. Economic models such as Implan should not be used when input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.		
9	The forest travel plans that are going on around Montana are using generated, estimated and false data to forward an agenda of locking people out of the forest. The economic impact of these closures will be significant and devastating to small communities throughout Montana. The " Implan Economic Model" should not be used when the input data is generated and not		

	factual or actual. Please use actual local data as to the economic and social impact of your proposed closures.
23	we have found some discrepancies, one being the economic impact statement. The facts and figures were not truly representative of the actual high use and financial benefits to this area brought by motorized use. We also realize that this chart was made from a computer model. This is unacceptable. We feel that there has to be a hands-on economic study done in those areas affected by this Travel Plan.
374	without any scientific polls to back up what I believe I can still say with confidence that our business consists 0 approximately 15% local business (including dinner guests from the surrounding area Great Falls to White Sulphur Springs),10% travel through business (park to park), 10% hunters, 65% recreation (skiing, snowmobiling ATV's, Motor bikes, hikers, fishing, campers - of this total cross country skiers and hikers produce "less than 1/2 of 1% ). I personally see no change In the total spending from that segment If they are accommodated with restrictions which would be placed on the major economic base of our business. Again, as I asked before, please keep in mind the fact that; as you restrict access to the national forest you also reduce economic opportunities in the whole area . While the loss of Forest Green Resort and Newlan Creek Club can't be blamed solely on economic pressure, the reluctance of potential buyers to consider those businesses is very definitely an economic consideration. The pending loss of the Cabin Saloon will also come about because of the economic consideration.
383	There is also the negative economic impact to business in Neihart, Monarch and White Sulphur Springs.
109	Trail closures have the potential of discouraging through the businesses in the Kings Hill area.
<b><u>Summarized Comment:</u></b> Economic models, such as IMPLAN should not be used when input data is estimated and not factual or actual.	
<b><u>Response:</u></b> The economic impact analysis presented in the DEIS is based entirely on actual estimates of forest visitation and visitor expenditures. This information is the required data input into the economic model, IMPLAN Pro. The IMPLAN Pro, which was used to estimate the employment and labor income effects, is based on factual data collected by Federal agencies, such as U.S. Department of Labor, Bureau of Labor Statistics and U.S. Department of Commerce, Bureau of Economic Analysis (MIG 2004).  Since the DEIS, the Lewis and Clark National Forest has interviewed nine off-road equipment dealerships surrounding the Jefferson Division. The interview collected information regarding their local employment and payroll, the number of off-road machines sold, the gross sales of off-road equipment and accessories, geographic location of the customer base, and the if their customers use the Lewis and Clark National Forest. The interviews were summarized and the results are presented in the final environmental impact statement.	

<b>Subject Code: ECON</b>	<b>Category Code: 301 – Effects on local economy.</b>
<b>Letter #:</b> 11	The majority of uses of these areas is non-motorized and non-motorized users spend more money and bring in more money to local economies than motorized uses. It only makes sense the new travel management plan would benefit non-motorized users and the local economies dependent upon the revenue they generate.
19	Studies from other states were not considered. While the studies available are from states with larger populations, they demonstrate the economic value of motorized recreation on the state, county and local economy. Table III-53 illustrating your estimated expenditures per trip does not present credible figures. Future 'possibilities' or opportunities for the economic future of the towns and counties that surround these mountain ranges was absent in the DEIS.
176	Motorized use contributes far more to the economy.
262	We have put tens of thousands of dollars into four wheelers and snowmobiles. We put thousands of dollars each year in gas and parts. We contribute a lot of money to our economy.
383	Snowmobiling is not the only thing that will be lost with these proposed closures. The charities will not have the funding
383	There is also the negative economic impact to business in Neihart, Monarch and White Sulphur Springs.
633	Closure of trails would also have a significant economic impact on the local economy. It seems like these areas have been traditionally motorized use areas and I cannot see any reason to

	change this detrimental to all.
109	Trail closures have the potential of discouraging through the businesses in the Kings Hill area.
132	Local tourism will be enhanced: Limiting motorized access will benefit the outfitters and long string of other businesses that support the fishermen who come to our area to enjoy fishing the Smith River and other wild and productive fisheries.
399	I also think the Jefferson Coulee closure will have a dramatic impact on Recreation business in Neihart. Many of the closures and restrictions on the trail system in this area will have a very adverse effect on the access in many areas during hunting season. Private land owners will have near complete control over the access to certain areas.
452	Snowmobiling provides a big benefit for this little community. On several occasions we have had the opportunity to visit with people from out-lying areas who have come here to stay and snowmobile for the weekend. This stay involves motels, meals out, gas for their snowmobiles and vehicles, maybe a parts sale from the local snowmobile dealer, snacks to take along from the grocery stores, and maybe a memento from the trip. It would be a shame to loose the income because more prime snowmobile areas are being considered to shut down.
571	For us a typical trip to Neihart includes a stay at a local hotel, dinner, lunch, & breakfast. If we weren't in the town snowmobiling I can tell you for sure I wouldn't just be passing through & therefore wouldn't spend a dime in those small towns.
<b><u>Summarized Comment:</u></b> Non-motorized users spend more money during their activity in comparison to motorized activities.	
<b><u>Response:</u></b> Expenditures (\$ per visit) by various activity types are presented on page 159 of the DEIS. This information was generated by Stynes and White (2005) using survey results from the National Visitor Use Monitoring survey. The analysis procedures used to estimate the economic impacts presented in the DEIS followed generally accepted procedures outlined in Alward et. al. (2003) and Stynes (2000).	

<b><i>Subject Code: ECON</i></b>		<b><i>Category Code: 300 – General economic concerns.</i></b>	
<b><i>Letter #:</i></b> 282	The most recent attempt to more specifically examine the role of protected public lands in the economy is an extensive study released in 2004 by the Sonoran Institute. What emerged from the study were several important findings. First, Wilderness, National Parks, National Monuments, and other protected public lands, set aside for their wild land characteristics, can and do play an important role in stimulating economic growth. Protected areas offer more economic stimulus than non-protected areas. While tourism can be a significant outgrowth of protected landscapes, a more important economic contribution of protected landscapes is that they serve as a magnet to attract newcomers and keep locals from leaving. The travel plan has economic implications and the environmental impact statement needs to address the economic value of establishing large blocks of quiet, motor-free areas.		
<b><u>Summarized Comment:</u></b> Protected public lands play an important role in stimulating economic growth in comparison to non-protected lands.			
<b><u>Response:</u></b> The economic impact analysis for the DEIS was not intended to evaluate the role of protected versus non-protected land. The intent of the economic impact analysis was to simply understand the economic effects attributable to all recreation activity types. The results of that analysis is presented in pages 156-165 of the DEIS.			

<b><i>Subject Code: ECON</i></b>		<b><i>Category Code: 300 – General economic concerns.</i></b>	
<b><i>Letter #:</i></b> 616	What route is proposed for cattle? We have tried both Arch and the bottom and the latter is much faster, cause less erosion, and is preferred. There area only two trips a year along the bottom, so the impact is nonexistent. What happens to the two outfitting businesses in Middle Fork (Sarah Stevenson and Ed Arnott)? If Middle Fork is closed to the public I am assuming it is not closed to these two outfitters and their clientele.		
<b><u>Summarized Comment:</u></b> How are outfitters who use the Middle Fork affected by this proposal?			
<b><u>Response:</u></b> The National Visitor Use Monitoring survey collects visitor use information for guided visitation to the National Forest. This information is included in the economic impact analysis presented in the DEIS on pages 156-165.			

## **FIRE COMMENTS/RESPONSES**

<b>Subject Code: FIRE</b>		<b>Category Code: 400 – Fire Management</b>
<b>Letter #:</b> 8	consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management. The analysis should include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure.	
24	A network of maintained roads is a major help in fighting wildfire.	
178	Now the USFS does a slash and burn program - that type of activity only puts our community at risk of uncontrolled fire danger.	
227	As a result having landing strips can expand safety and firefighting capabilities in the forest without cutting roads into environmentally sensitive areas and the airstrips are far less expensive to maintain than a road.	
612	My experience with "controlled" burns indicates that only in Alaska where large primitive areas with low value resources, are suitable for this activity.	
616	On July 6, 1985 there was a fire in Middle Fork. We had 170 cows trapped. No one knew where the fire was going and we had to move the livestock. We spent fifteen hours on horseback getting them out. Thank goodness there were two ways into the area (King Creek and Yogo). If we had been cut off by fire one way we still could have escaped. I think it is imperative to have access from two directions into this drainage.	
227	Having emergency strips available can make the difference of life and death for the pilot and passengers as well as prevent a forest fire if the aircraft catches fire after contacting" several large pine or fir trees on the way to the ground.	
D-8	As a home owner, I am concerned about the ability of the forest service and other entities to combat fire. Many of these roadways need to be open in order to get crews and supplies into areas of timber that could burn and eventually get to towns and individual homes. We need to be proactive, and not reactive to preventing fire.	
<b><u>Summarized Comment:</u></b> Having roads available allows woodcutters to remove fuel from the forest, and also makes fire suppression efforts safer and more effective.		
<b><u>Response:</u></b> Firewood cutting does remove fuel from the forest, and can be an important factor in the reduction of risk of catastrophic wildfire in localized areas. The Forest Service will still be able to allow and encourage firewood removal from identified areas to help reduce fuel loads.		
<p>Fire suppression efforts do at times utilize roads to facilitate access to a fire and roads can be used as an anchor point or control line to stop or slow the spread of an un-wanted wildfire. However, there are safe and effective suppression techniques to suppress wildland fires without the use of established roads.</p> <p>The Lewis and Clark NF is actively engaged in fuel reduction efforts around communities and developments at risk of wildfire. We will continue working with local entities to reduce the fuel loadings around communities, homesites, and private property.</p> <p>Aircraft are an important resource in the suppression of wildfires, but there is minimal to no need for landing strips near a wildfire. Helicopters are used during initial attack to ferry crews and supplies into remote areas. Fixed wing aircraft provide recon information, and engage in dropping of fire retardant. Developed airstrips could be useful once a fire becomes large to facilitate the staging of large (heavy) helicopters nearer the fire, but there is also a need for good road access to the airstrip to allow fuel trucks and supply vehicles to support the aircraft.</p> <p>We recognize the value of having more than one escape route from drainages such as the Middle Fork Judith that have a risk of wildfire, but we also recognize that the escape route has to be suitable for travel by the same mode of transportation as used to travel into the area. If a person rode horseback or hiked into an area, then it is reasonable that a stock or hiking trail would be a suitable secondary escape route. But if a person drove a full-sized vehicle into an area, then it becomes questionable as to whether or not an ATV trail is a suitable escape route, because the person probably does not have an ATV to escape on, and may not be healthy enough to hike out under stressful conditions.</p>		

**FISHERIES COMMENTS/RESPONSES**

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 27	FWP commends the Lewis and Clark Forest for proposing to reduce vehicle/ATV use in the Middle Fork Judith and its tributaries like King Creek. Sediment covers the substrate in the Middle Fork and trout populations are much lower than expected for the size and water chemistry of the stream.	
<b>Response:</b> Our own surveys and experience have validated the urgent need to address these problems with the existing Travel Plan. Escalating use levels and changing ownership patterns in the Middle Fork Judith basin necessitate changes in access management to bring roads and trails into compliance with our responsibilities to protect water quality and fish habitat.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 27	ATV/vehicle fords may currently impact fisheries in Daisy Dean, Yogo Creek, Middle Fork Judith, North Fork Running Wolf and Haymaker Creek. Sampling in 2006 on Daisy Dean Creek found that brook trout populations were surprisingly low in the area of ATV crossings. Under Alternatives 3 and 5, ATV trails would still run up Daisy Dean and Haymaker Creek. To protect fisheries, it is recommended that wet ATV/vehicle crossings be minimized as much as possible either by trail re-routing, closure or bridges. Also, new ATV trails should not be opened along riparian areas. Motorcycles do not seem to have as much impact as ATVs.	
<b>Response:</b> This information was used to develop several strategies for reducing ATV impacts to fisheries in these streams, and the issue will be a key consideration in developing the final decision. Implementation of a new Travel Plan should better balance recreational use with stream protection. Any new ATV trail locations must fully consider and mitigate potential impacts to riparian areas.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 27	The DEIS did not look at the dispersed camping roads and crossings along Yogo Creek. These roads provide access to camping sites and fishing and do not show up on the Alternative 5 map, but appear on other alternatives. The Judith DEIS indicated most of these fords had little risk to hydrology, so there might be minimal impact to the fisheries if they remain open. However, they should be evaluated for the travel plan.	
<b>Response:</b> The revised analysis in the FEIS determined there were approximately 47 road crossings and 21 stream crossings in the Yogo Creek watershed, not counting fords on private lands. The effects of so many stream crossings on this small stream were acknowledged, and the benefits to fish habitat of reducing both the number of crossings and the riparian road and trail mileage with Alternative 5 were discussed.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 27	Fisheries: It is important to upgrade the trails to ATV standards prior to opening them to ATV use and to maintain the trails to prevent resource impacts. There are many current examples where lack of maintenance on ATV trails is causing resource damage. Some examples of areas where ATV maintenance needs are high include: the Upper Harley Creek area, Jefferson Creek headwaters, and the Sheep Creek area.	
39	...only 5.2% per year of the travel ways in the forest have received maintenance in the last six years... we still find it astounding that such a small percentage of the roads and trails receive even basic maintenance. The net result of deferred maintenance is, of course, significant and will have direct effects upon the fisheries resources. Clogged and unmaintained roadbeds, culverts, dips, bridges, and shoulders will lead to loss of materials in the road prism and those materials, in the form of silt, rocks, stones, and boulders will be carried downhill into the streams and watercourse of the forest. The direct negative effect upon spawning and rearing areas and the remaining habitat for fish may be catastrophic.	
42	We are concerned that there appears to be inadequate funding and resources to properly maintain roads and keep them in fair to good condition to minimize erosion and water quality and fisheries impacts. We believe the preferred alternative must include a greater commitment of resources to road maintenance to reduce risks to water quality and fisheries.	

**Summarized Comment:** Commenters are concerned about lack of maintenance on travel ways and resulting impacts to streams and fisheries resources. They would like to see this shortfall addressed in the decision.

**Response:** The FEIS and ROD acknowledged the road and trail maintenance backlog and resulting resource impacts as a major reason to consolidate the travel system. The maintenance funding issue is also being addressed at our regional and national office levels. Strategies to reduce maintenance needs, prioritize funding on water quality problems, and improve track records are outlined in the ROD.

<b>Subject Code: FISHERIES</b>   <b>Category Code: 500 – Effects on Fisheries Habitat</b>	
<b>Letter #:</b> 27	Frequently, roads that are closed to motorized travel are not properly decommissioned to prevent future impacts to streams and subsequently to fishery resources.
<b><u>Response:</u></b> With implementation of a new Travel Plan, a more focused approach to road decommissioning will be developed. Road closure projects will receive a higher level of review and involvement from hydrology and fisheries specialists, and new standards are being developed to promote watershed rehabilitation.	

<b>Subject Code: FISHERIES</b>   <b>Category Code: 500 – Effects on Fisheries Habitat</b>	
<b>Letter #:</b> 27	(Fisheries) There are several areas of the forest open only to motorcycle traffic, and traditionally the areas used by motorcycles show little impact. If ATVs are allowed on these sections of trail the associated impacts will increase due to increase in trail width and the additional ground disturbance that ATVs cause and the common practice of trail pioneering. FWP would encourage the Forest Service to restrict open motorcycle trails to 2 wheeled OHV's. Some specific examples are: Deep Creek Park trails and the Pilgrim Creek Trail.
<b><u>Response:</u></b> These impacts will be considered in proposing and evaluating new routes for ATV travel. The FEIS discusses specific threats to fisheries from system and non-system ATV trails identified during the analysis. Clearly, all ATV routes which encroach on riparian areas have potential to degrade aquatic resources. Concerns about water quality and fisheries will play a key role in shaping the Decision alternative.	

<b>Subject Code: FISHERIES</b>   <b>Category Code: 500 – Effects on Fisheries Habitat</b>	
<b>Letter #:</b> 27	Motorized travel can have significant impacts on stream and fishery resources through increased sedimentation, direct impacts to bank stability, and damage to riparian vegetation. Minimizing these impacts is critical to maintaining Montana's excellent and world-renowned fisheries.
42	The desirable features EPA considers particularly worthy of including in a modified preferred alternative include: ...reduce sediment production from roads/trails; ...maximize watershed and water quality improvement; restore/protect fisheries; ...include Goals, Objective, Standards and Guidelines to maintain/improve fisheries habitat and reduce sediment delivery. Summer-Alternative 5 provides the greatest protection to water quality, aquatic habitat and fisheries.
D-74	Riparian Ecosystem Health -- vehicle use on riparian roads in the area will contribute to riparian system degradation and bank erosion. Vehicle crossings during low water months will jeopardize in-stream habitat and spawning grounds.
282	Forty-seven miles of riparian roads and motorized trails including Hoover Creek, Middle Fork and Lost Fork of the Judith River, Daisy Dean Creek, Tenderfoot Creek and Deep Creek roadless area would be closed to motorized vehicles (Alt 4). These closures will help prevent vehicles from churning up the creek bottoms and eroding banks, thereby reducing the damage to fish habitat.
635	ORV's damage streambeds and bogs. ORV's kick up silt that damages trout spawning habitat. Protection of riparian areas will enhance camping and fishing opportunities.

**Summarized Comment:** Commenters are concerned about the effects of roads and motorized trails on fisheries and riparian areas. One agency proposes standards to maintain and improve fisheries habitat. The beneficial effects of Alternatives 4 and 5 are supported.

**Response:** The FEIS provides additional analysis regarding these effects. It is important to understand that non-motorized travel, especially horse use, can also impact streams and fish at trail crossing sites. Not all trails in the analysis area which are open to and receiving motorized use show

evidence of damage to fish habitat or fish populations. In particular, some trails open only to motorbike use do not appear to be affecting fish habitats. Specific trail conditions and use levels vary considerably across the Forest, undermining generalizations about impact levels. The Forest Plan already includes direction to protect riparian areas and fish habitat while providing an appropriate transportation system for management and public access.

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>	
<b>Letter #:</b> 27	Fording of the Smith River will cause damage to stream banks and riparian vegetation and will increase sedimentation and turbidity. In general, fords should only be utilized in areas where traffic is infrequent.		
33	We note the proposed motorized access to Tenderfoot and Deep Creek, which are cold water, refuge for fish in the Smith River. We believe this proposal is potentially detrimental to the native and wild fisheries resource. We have strong concerns for these native and wild fish and believe that the cold water in the two named tributaries may help save much of the Smith River fish populations as we continue to get warmer and warmer summers. The disruption of habitat and fuel spills by motorized vehicles should be avoided completely.		
282	Vehicles should not be allowed to travel down to the campsites along the (Smith) river...Nor should off-road vehicles be allowed to travel down Tenderfoot Creek churning up the bottom and increasing silt into fish habitat.		
492	Little Tenderfoot Creek...was simply paved with fish standing against the current...I've seen guys on ATV's drive right up the middle of a creek like that...I wouldn't want to come back to Little Tenderfoot in a few years and...wonder where the fish and the bears went after the hillsides and gravel bars get chewed up and send clouds of silt down the creek.		
495	Tenderfoot Creek and Deep Creek are important fisheries for the Smith River...Smith River vehicle fording sites in the Deep Creek area disturb stream substrates and increase bank erosion. Tenderfoot Creek escalating ATV trespass and unauthorized use on public and private lands in the lower drainage is directly impacting the stream channel at fording sites; 4WD vehicles and ATV drivers use portions of the stream corridor as a roadway, threatening resident fish habitat and spawning sites for trout from the Smith River.		
542	The Smith River is a special experience and having ATVs driving up to the river would take away from the experience. There would be nothing stopping the drivers of these ever more technologically advanced machines from driving right over the banks and into the water. This would result in bank erosion and would harm the famous fishing opportunities.		
<b>Summarized Comment:</b> Commenters are concerned about threats posed by vehicular and ATV use to the special values of the Smith River/Tenderfoot/Deep Creek area, especially the fisheries values.			
<b>Response:</b> The FEIS acknowledges the important non-motorized aesthetic values (including fishing opportunities) of the Smith River corridor and Tenderfoot Creek area, as well as the need to protect WCT habitat in North Fork and South Fork of Deep Creek. Alternatives 4 and 5 would curtail motorized travel in these riparian areas with resulting benefits to fisheries, as disclosed in the FEIS. These effects will be considered and discussed in the ROD as a balance between motorized and non-motorized recreation is sought.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>	
<b>Letter #:</b> 42	Has the Lewis & Clark NF evaluated or conducted a survey of fish passage on culverts on the District? Since culverts often impede fish passage, we recommend that such a survey be conducted to identify culverts causing fish passage problems. A priority list of culverts requiring modification or replacement should then be developed.		
<b>Response:</b> We have evaluated fish passage at culverts in the analysis area as part of a previous study. The results indicated very few culverts were blocking adult fish passage, and few of these appeared to be causing any significant harm to fisheries. We have already prioritized our fish passage needs, and in fact, are more focused on ways to <i>reduce</i> access for non-native trout to headwaters stream reaches that still support native westslope cutthroat trout. These sensitive fish populations are vulnerable to displacement by non-native brook trout and hybridization by non-native rainbow trout.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 42	At a minimum we believe there should be a supplemental Standard or Guideline indicating that priority in road closures and rehabilitation would (be) given to roads causing water quality and fisheries impacts.	
<b>Response:</b> Our Roads Analysis process currently facilitates such an approach to decommissioning as new proposed actions are developed. Roads with the highest risk to water quality, fisheries, and/or wildlife security are assigned a high priority for seasonal or permanent closure and rehabilitation. This will continue to be an important component of implementing a new Travel Plan.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 500 – Effects on Fisheries Habitat</b>
<b>Letter #:</b> 313	My primary concern is the Middle Fork of the Judith River in the Belts. The FS has absolutely no historical monitoring data to justify proposed management changes. Many of the crossings enter and exit the creek on gradual gravel bars with absolutely no erosion concerns. Over the years, beginning in the late 1940's with the advent of WWII military jeeps becoming available to the public, some of the creek crossings in Middle Fork have receded into the banks...As vehicles enter the crossings, they stir the sediment up and force some into the moving stream channel. This effect could easily be mitigated through a cooperative effort by adding rock to the crossings to reproduce the original channel and eliminate the slow and stagnant pools and streambank recession. Most of the sediment originates in the upper reaches of the Lost Fork due to the vast acreages of the watershed consumed by the wildfires over the past 20 years. Again, the FS has absolutely no historical monitoring data to document resource degradation caused solely or in part by public use of the Middle Fork road.	
<b>Response:</b> Actually, Montana Fish, Wildlife and Parks has submitted historical and recent fisheries data to us which further substantiate our concerns about the effects of the 26 fords on the Middle Fork. Their records indicate that as far back as 1968, fish populations were suppressed in this part of the river, but fish numbers improved progressively upstream as the effect of multiple fords diminishes. Additional surveys track the apparent adverse effects of the Sandpoint Fire on the Lost Fork fish population, as well as the apparent recovery by 2001. Yet the most recent data (2005) for the Middle Fork shows no such fish recovery. It is important to remember that sediment from fires is transported through stream system in pulses with seasonal runoff. Late spring spawning rainbow and cutthroat trout are able to flush naturally-accumulated sediment from their gravel nests during spawning, but the incubating fish embryos are vulnerable to subsequent re-suspension and deposition of new sediment from vehicle fording during May through July. Of course, fish embryos and aquatic invertebrates (fish food) are directly destroyed by tire crushing at fords. An examination of the photo record reveals that nearly every ford on the Middle Fork road has resulted, over time, in large volumes of bank material on both sides of the stream being eroded into the river. More sediment is added every year by wake action, tire treads, wheel wells and vehicle undercarriages delivering mud from the adjacent section of road. Furthermore, the 26 fords represent 52 points where stream bank stability has been seriously compromised. Attempting to stabilize this system by adding unconsolidated rock to restore natural channel dimensions and backfill side pools would be cost-prohibitive and ineffective, given the size and frequency of spring floods in a river of this size.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>
<b>Letter #:</b> 2	The Little Belts have high concentration of native west slope cutthroat pops and many of these are impacted by roads and trail crossings as well as routes in the riparian zone. These impacts are exacerbated by insufficient maintenance.	
42	Specific concerns about the impacts of roads and trails on habitat for westslope cutthroat trout (WCT), especially in Tenderfoot Creek./Smith River, S.F. Judith River, N.F./S.F. Deep Creek, Hoover Creek and Graveyard Creek (i.e., primary concerns are sedimentation, damage to spawning gravels , and population security).	
<b>Response:</b> Concerns about impacts of roads and trails on WCT were identified and analyzed as a significant issue. Both the number of stream crossings and the miles of roads and trails in riparian areas were used to evaluate effects of the alternatives on WCT streams. These results are disclosed in the FEIS and will be duly considered in the ROD.		

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 2	The Forest Service should consider seasonal closure for stock on trail 732 to the juncture with trail 735 until August 15 <sup>th</sup> to protect cutthroat spawning in Hoover Creek. If necessary alternate access to upper Hoover Creek could be provided.		
33,282	Hoover Creek is habitat for a pure strain of westslope cutthroat trout. Off-road vehicle use is evident on Hoover Creek trail 732 which has numerous stream crossings.		
342	Now you are claiming Hoover Creek has healthy numbers of cutthroat trout, which is not correct. We fish Hoover Creek on a regular basis and have never caught cutthroat in Hoover and Fish and Game can verify that.		
602	I was also thinking about ... how much the motorized travel has increased in the (Hoover) creek bottom the last two or three years...Hoover Creek does not look like how I remember it in the late 90's. I think outfitter use, with numerous trips of several pack animals per trip is probably more than the resources can stand. I think motorized use of any kind is probably more than the resources can stand.		
<b>Summarized Comment:</b> Commenters express various opinions on the effects of trail use and the status of fisheries in Hoover Creek. Some suggest ways to better protect WCT habitat, others dispute the presence of WCT.			
<b>Response:</b> Effects of the trail system on the Hoover Creek fishery are evaluated in the FEIS, and the need to mitigate the impacts of multiple fords and multiple users (hiker, motorbike and horse travel) identified. WCT were last confirmed present in abundance in the north and south forks of the creek in 1998. Their numbers may have diminished since that time, but this fishery is still considered a conservation population by Montana FWP, giving it priority for protection. The decision will seek to resolve the existing trail impacts in Hoover Creek.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 2	South Fork of the Judith – this stream holds a large, wide spread cutthroat population that the Forest Service made a significant investment in restoring. Alternative 5 protects these values and these management prescriptions should be followed in all alternatives.		
27	Alternatives 3 & 4 show a new ATV trail up the South Fork Judith, including Deadhorse Creek and Russian Creek. This trail would have a negative impact on the native westslope cutthroat trout. Creating an ATV corridor here does not correspond with the management of this area proposed in the Judith DEIS and would compromise the benefits of a large expensive barrier that is being constructed to protect the WCT in the South Fork drainage. An ATV trail up the South Fork Judith would hurt aquatic integrity and impact the most extensive native westslope cutthroat trout in the entire Judith drainage. The existing trail has several fords and would require extensive widening and tree removal to make it suitable for ATVs.		
	The proposed ATV road on the S. Fork of the Judith River is, in our view, inappropriate. This drainage holds a remnant population of native salmonids. The construction of this proposed road/trail will add silt to the stream and will have a serious adverse effect on the native fish. It's a bad place to put an ATV road/trail when the resource at risk is one of the few remaining populations of the Missouri River strain of the Westslope Cutthroat Trout.		
282	The South Fork (Judith) is an easily accessible and a popular camping and fishing area, but the river does not meet the State's water quality standards and it is one of the few areas in the state that supports genetically pure cutthroat trout. Continuing to allow vehicle use is inappropriate given the narrow canyon and the proximity of the trail to the stream.		
433	The South Fork of the Judith is a Water Quality limited stream. Trails #439 and #440 should remain closed under all alternatives to protect the drainage's westslope cutthroat trout population.		
<b>Summarized Comment:</b> Commenters express concerns about potential motorized trail impacts on the WCT population of South Fork Judith River.			
<b>Response:</b> The proposed ATV trail along the South Fork in Alternatives 3 and 4 appears to be an inadvertent carry-over from the Alternative 2 template with few if any advocates. The threat posed by conversion of this single-track trail to ATV use is discussed in the FEIS. Because the Forest Service is a partner to a major WCT restoration project in the upper South Fork Judith basin, we are committed to full protection of fish habitat there. The ROD will reflect this consideration.			

<b>Subject Code: FISHERIES</b>   <b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 27	Closure of the road going up North Fork Running Wolf as proposed in Alternative 5, should benefit the pure WCT in that stream.
<b>Response:</b> New information obtained during the FEIS analysis indicates that most of this road is under county jurisdiction. The Forest Service does not have independent authority to restrict its use and must enter into an agreement with county officials to mitigate the impacts on the WCT population which is threatened by sedimentation from the multiple fords.	

<b>Subject Code: FISHERIES</b>   <b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 27	The proposed trail in the Sawmill Gulch area is perplexing. In 2001, the Forest Service conducted an EIS with a record of decision concluding that off-road motorized use (specifically stream fording) caused significant damage to streams and fish habitat: Based on this EIS/ROD the Forest closed the area to motorized travel. Now the proposed action includes allowing motorized travel in the Sawmill Gulch area again. This proposed action will cause damage to fisheries resources in the Sawmill Gulch area and should be reconsidered.
342	You close Sawmill creek to motorized vehicles because of Cutthroat trout, which are not an endangered species. This stream only runs approximately ½ mile and then goes under ground, some years it almost totally dries up. Fish and Game, which are the regulatory stewardship for the State of Mt., should be the regulatory body for Cutthroat trout not the Forest Service. I have spoken to Fish and Game in Great Falls and they tell me that they have no real concerns toward the Cutthroat trout. They have stated that the cutthroat is stable and healthy.
<b>Summarized Comment:</b> Commenters express opposing views about Sawmill Gulch and the WCT fishery. There appears to be misunderstanding about the status of cutthroat trout and the available habitat in Sawmill Gulch.	
<b>Response:</b> Re-establishing a motorized route in Sawmill Gulch was a mapping error in Alternative 2 that was deleted from all later alternatives. There is no public right-of-way across private property to reach the trail. However, Forest Service surveys in 1995, 1997 and 2001 confirmed the presence of a WCT population in approximately 1-2 miles of perennial stream in the upper reach of the gulch. WCT are listed by Montana FWP as a Species of Concern and are the subject of a statewide conservation agreement which focuses attention and effort on protecting all remaining populations. The Sawmill Gulch population has been identified as a “conservation population” under that agreement.	

<b>Subject Code: FISHERIES</b>   <b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	...historic motorized river crossings in Kings Creek have created significant sediment loads to the creek which has and continues to damage rearing habitat for westslope cutthroat trout in lower King Creek and adult trout habitat downstream in Harrison-Creek. Closing and rehabilitating the King Creek Trail is therefore necessary.
<b>Response:</b> This over-riding concern guided the development of all alternatives, none of which would keep the King Creek trail open. Rehabilitating the old trail will need to be a priority as soon as implementation of a new Travel Plan begins.	

<b>Subject Code: FISHERIES</b>   <b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	Deep Creek (north and south forks) have pure strains of native, westslope cutthroat trout that should be protected.
282	Westslope cutthroat trout also exist in the Deep Creek. While vehicles are not the only source of sedimentation, they are an added source of sedimentation.
<b>Summarized Comment:</b> Commenters want to see WCT habitat in Deep Creek protected from sedimentation. One commenter acknowledges other (non-vehicle) sources of sediment.	
<b>Response:</b> Only the upper perennial sections of the North and South forks of Deep Creek support a WCT fishery. The North Fork population is stable and has been used as a donor for starting a new WCT population in a fishless stream on the Rocky Mountain Front. Currently, there is no evidence that motorbike use on the trail system is harming this fishery. Increasing use levels, new ATV trails,	

or ATV trespass into these areas would pose risks to this important WCT refuge. These effects are discussed in the FEIS.

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	In the DEIS the USFS concedes that the motorized routes (system and user created) and stream crossings, in addition to livestock grazing, mining (historic), timber harvesting, and the introduction of non-native trout impact WCT but then fails to actually analyze those impacts on WCT - either directly, indirectly, or cumulatively.		
<b>Letter #:</b> 635	The DEIS analysis of the cumulative impacts on west slope cutthroat trout from sedimentation, pollution and destruction of vegetation is inadequate.		
<b>Response:</b> An expanded WCT analysis is provided in the FEIS. Cumulative effects are summarized for the analysis area because insufficient data is available to quantify the effects on WCT habitats of all activities taking place in those watersheds. Where information allows, these other observable effects are discussed for specific streams. As explained in the Water Quality section, there is simply no way to reliably quantify the amount of sediment entering these streams from the many natural and human sources. Consequently, the analysis must be based on observations and judgments tempered with limited empirical data. When population sampling indicates that WCT fisheries are within the expected range of abundance and age-class distribution, we infer that habitat is generally in good condition and cumulative effects are not limiting. Identification of problem roads and trails that are combining with other actions like grazing and non-native fish to create adverse cumulative effects which threaten the viability of WCT has usually not been difficult to do. These concerns are disclosed in the FEIS.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	From a management perspective, it is extremely important for the USFS to provide adequate buffer zones between travel ways and streams, and to minimize stream crossings in any and all streams inhabited by WCT. Any routes with erosion problems that cause or contribute to stream sedimentation problems or excessive channel damage need to be immediately repaired, restricted, relocated, or closed.		
<b>Response:</b> We agree with this approach and based the FEIS analysis on those specific effects. We intend to prioritize our mitigation efforts on threats posed to WCT habitats by the travel system.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	The USFS needs to protect and enhance WCT populations and habitat in the analysis area...What affirmative steps is the USFS doing to protect and enhance WCT habitat in the analysis area? Why does the USFS continue to authorize motorized access to the few remaining watersheds that are inhabited by pure strains of WCT? What is the USFS doing to limit the impacts of roads and trails, livestock grazing, fish stocking, and timber harvesting in these 70 [WCT] stream segments?		
<b>Response:</b> Our cooperative efforts with Montana FWP to protect and restore WCT populations and habitat are described in a series of annual MFWP reports available to the public. These include about ten projects in the analysis area. Not all WCT watersheds have significant motorized access, and those that do are being evaluated for ways to reduce potential effects, as disclosed in this FEIS. The LCNF is revising grazing plans and building riparian exclosures to protect WCT habitat, establishing wide buffers for timber or fuels management in WCT streams, reclaiming mining areas to improve water quality, and partnering with all MFWP non-native fish removal projects for WCT streams.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 33	(rerouting Trail 311) The new ATV trail could link up with Trail 338 thereby opening up the entire Tenderfoot/Deep Creek IRA to motorized access...How will cutthroat trout habitat in the watershed be indirectly impacted?		
<b>Response:</b> Managing ATV use in the Tenderfoot and Deep Creek areas has been thoroughly evaluated in the FEIS and ROD. The need to protect WCT habitats in these areas is recognized and discussed.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 433	Summer Alt 5 eliminates 735 stream crossings and removes 105 miles of roads from stream corridors, which will reduce the amount of stream choking sediment in important westslope cutthroat trout streams.		
<b>Response:</b> The reductions in stream crossings and riparian roads and trails are displayed for each alternative and the potential effects on fish habitats discussed in the FEIS. Alternative 5 would provide the greatest benefit to fisheries.			

<b>Subject Code: FISHERIES</b>		<b>Category Code: 501 – Effects on Westslope Cutthroat Trout</b>	
<b>Letter #:</b> 638	Several alternatives have Big Timber road listed as non-motorized to preserve cutthroat trout habitat. I sincerely believe if the concern is truly cutthroat trout habitat preservation, you ought to be looking at the cattle grazing as a greater disturbance of creek banks.		
<b>Response:</b> Preserving WCT habitat would not be the primary reason for closing Big Timber road. Improving wildlife security and reducing the Forest road infrastructure and maintenance inventory would be more important outcomes. However, cattle grazing can indeed cause very significant amounts of bank disturbance and alteration which may exceed road impacts in many streams. The LCNF is, in fact, trying to improve grazing management in riparian areas and phasing in new standards for limiting the amount of bank alteration by livestock in streams across the Forest. This strategy will require more participation from grazing permittees and take time to produce results.			

### **FOREST PLANNING COMMENTS/RESPONSES**

<b>Subject Code: FOREST PLAN</b>		<b>Category Code: 600 – General Forest Plan comments</b>	
<b>Letter #:</b> 33	The authorization of airstrips in certain Management Areas (MAs) is also in direct conflict with the Forest Plan and a violation of NFMA. For instance, the Deep Creek Park, Middle Fork Judith, and Lost Fork Judith airstrips are allocated well inside MA F. MA F is generally "undeveloped land with limited motorized access on existing roads and trails." ...There is absolutely no authorization or even mention of improvements for airstrips in MA F. In fact, airstrips are not discussed at all within this MA. As such, the three airstrips proposed in the DEIS that are within MA F --Deep Creek Park, Middle Fork Judith, and Lost Fork Judith airstrips - are in conflict and inconsistent with the Forest Plan. ...As with MA F, MA B does not authorize improvements for airstrips. MA B does discuss improvements for trailheads but fails to even mention airstrips. ...The USFS's conclusion in the DEIS to the contrary – that the improvement and maintenance of airstrips within MA B is not "in conflict" with the Forest Plan direction for MA B – is incorrect.		
<b>Response:</b> The DEIS at pages 78 and 83 recognizes a potential conflict with Forest Plan direction for airstrips within Forest Plan Management Area F, including those within the Middle Fork Judith WSA, Deep Creek Park, and Lost Fork Judith. The DEIS (page 83) states that MA B direction (Russian Flat area) does not specifically address airstrips as improvements, but that a potential airstrip is not in conflict with the Forest Plan. MA B direction allows for such things as utility-transportation corridor and facility siting, so long as they are not in conflict with the management area's goals, which are to emphasize timber management and provide a moderate level of livestock forage production, while minimizing impacts to other resources. Such a use, including airstrips, could be authorized and be consistent with Forest Plan direction as long as it did not conflict with MA goals.			

<b>Subject Code: FOREST PLAN</b>		<b>Category Code: 600– General Forest Plan comments</b>	
<b>Letter #:</b> 33	...additional Forest-wide objectives, regulations, and policies to manage and protect all identified eligible wild and scenic rivers in the analysis area (i.e., Tenderfoot Creek, Smith River, and the Middle Fork Judith River) and maintain their "existing condition" are not being complied with.		
<b>Response:</b> Forest Plan amendment #2 (Wild and Scenic River Study, USDA Forest Service, 1989) identifies certain river corridors as eligible national wild, scenic, or recreational rivers on the Lewis and Clark Forest and assigned each a potential classification. The amendment established management standards to be applied until a river suitability study is completed and/or a future decision			

is made on their designation in the National Rivers system.

A .25 mile wide corridor along 8.6 miles of Tenderfoot Creek, from Falls Creek to its confluence with Smith River, was identified as a potentially scenic river corridor. A .5 mile corridor on the east side of the Smith River, from the mouth of Tenderfoot Creek to where it exits the National Forest boundary, was also identified as a potentially scenic river corridor. Management direction for potential scenic rivers with regard to motorized travel states that “Motorized travel on land or water may be permitted, prohibited or restricted to protect the river values.” With regard to road construction, management standards state: “Roads may occasionally bridge the river area and short stretches of conspicuous or longer stretches of inconspicuous and well-screened roads or screen[ed] railroads could be allowed. ...” Travel management alternatives for types of use (motorized or non-motorized) and season of use are within the management direction set forth for these areas. No new road construction is proposed under any of the alternatives.

A 4.8 mile stretch of the Middle Fork Judith River from Arch Coulee eastward to the Forest boundary is identified as a potential recreational river. Management direction for potential recreation rivers with regard to motorized use states that “Motorized travel on land or water may be permitted, prohibited or restricted. Controls will usually be similar to surrounding lands and waters.” With regard to road construction, management direction for scenic river corridors states, “Paralleling roads or railroads may be constructed on one or both river banks. There can be several bridge crossings and numerous river access points. ...” Again, travel management alternatives for types of use (motorized or non-motorized) and season of use are within the management direction set forth for these areas. No new road construction is proposed under any of the alternatives.

<b>Subject Code: FOREST PLAN</b>		<b>Category Code: 600 – General Forest Plan comments</b>
<b>Letter #:</b> 635	The DEIS says that the travel plan will be consistent with the Forest Plan, as it should. However, the Forest Plan is way out of date. The failure to redo the Forest Plan is a flaw in the analysis. The FEIS on the travel plan will by definition change the Forest Plan, but the DEIS does not make that clear and does not provide any insight into how adopting the travel plan will alter the Forest Plan. The Forest Plan analysis of the management areas should have been conducted before the travel plan because the management areas are out of date.	
<b>Response:</b>	The Lewis and Clark Forest is not scheduled to begin Forest Plan revision until around 2009. This is due largely to funding limitations and a desire to complete other Forest Plan revision efforts in the Region before initiating new efforts. If there are inconsistencies between the Travel Plan directions and existing Forest Plan direction, one of two things must take place; either the action must be modified to be consistent with the Plan, or the Plan must be amended. No Forest Plan amendments resulting from travel management have been identified to date. Management direction in the Lewis and Clark Forest Plan is fairly permissive with regard to travel management and management area direction. During plan revision, the results of travel planning could indeed result in changes to, or more detailed clarification of, management area prescriptions with respect to things such as semi-primitive motorized or non-motorized designations.	

**HERITAGE COMMENTS/RESPONSES**

<b>Subject Code: HERITAGE</b>		<b>Category Code: 700 – Cultural/Historical resources</b>
<b>Letter #:</b> 8	We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. Western culture and heritage has been characterized by opportunities to work with the land and preservation of all remnants of this culture and heritage is important. Current management practices are not adequately protecting western culture and heritage...	
159	I am opposed to the proposed new motorized trail from the confluence of graveyard creek and Harley creek that runs up the ridge and connects with the Logging Road at the head of Graveyard Creek. At the present time, this is a user created trail that dead end's about 3/4 of a	

	mile beyond the cemetery. It also runs thru the middle of the cemetery that is the original Neihart cemetery that is still active with several headstones and ornate enclosures. There is also considerable historical significance to the cemetery that would be impacted with an ATV trail running through the middle of it.
<b>Summarized Comment:</b> There is concern that current management practices are not protecting heritage sites, particularly those related to mining, logging, homesteading, other settlement, resource-oriented activities, and associated access routes. Also, there is a concern that the Graveyard gulch cemetery is being degraded by an ATV route.	
<b>Response:</b> In the DEIS, the heritage section (pages 28-47) covers historic background of the project area and methods the Forest uses to comply with the National Historic Preservation Act. See pages 30-31 and 36-38 for information specifically related to the types of sites listed as concerns. That section also describes how Forest Heritage Resource personnel identify sites, assess significance, and develop appropriate protection measures. Heritage work done for the National Environmental Policy Act (NEPA) DEIS is merely the initial phase of NHPA Section 106 review.	
Impacts to the Graveyard Gulch cemetery are resulting from a non-system route. No proposed travel plan alternatives include adoption of this route. A special closure is being pursued to resolve the situation.	

<b>Subject Code:</b> HERITAGE		<b>Category Code:</b> 701 – Tribal uses, treaty rights, traditional properties
<b>Letter #:</b> 33	comprehensive resource inventories and consultation with the affect tribes and Montana State Historic Preservation Officer will be required in order to properly document and assess the impacts to any and all historic and cultural resources. How will the proposed summer and winter Travel Plan impact the Crow Tribe's sacred sites and ceremonies? How can the USFS ensure compliance with the National Historic Preservation Act ("NHPA") and take a hard look at the impacts of the proposed Travel Plan as required under NEP A having only..	
33	there is no indication that such "reasonable steps" to identify historic properties in the analysis area have been undertaken. How can the USFS assume that it will effectively apply mitigation measures for historic and cultural resource protection without knowing where all of those objects are located? Under the NHP A, more is needed, has the USFS consulted with ail interested tribes on historic properties within the entire analysis area or just in relation to a site-specific project?	
<b>Summarized Comment:</b> There are concerns that tribes and the Montana State Historic Preservation Office (SHPO) have not been adequately consulted. There are also concerns that reasonable steps have not been taken to comply with the National Historic Preservation Act (NHPA) to identify potentially affected sites. There are specific concerns that Native American sacred haven't been considered.		
<b>Response:</b> Tribal members were informed of the different public scoping meetings through various public announcements, as was the general public. Eleven area tribes were included in the NEPA mailing list. They received copies of the DEIS. Also, the Forest Archeologist, District Rangers, and/or the Forest Supervisor personally visit tribal representatives on their reservations for regular discussions of Forest proposals. The Crow were included. They brought forward no concerns.		
NEPA is not the main approach to cultural resource identification and site preservation, it is part of the initial analysis and a tool for public disclosure. SHPO consultation and review under NHPA has resulted in their concurrence with the methods proposed. A phased inventory approach, with completion ahead of ground disturbance and travel plan implementation was chosen. This approach will also be used to monitor sites near existing routes including those used for winter travel. In this way all sites not currently known will be identified, and avoidance measures or mitigation measures developed prior to implementation. Findings and plans for continued compliance are presented in the EIS.		

## MINERALS COMMENTS/RESPONSES

<b>Subject Code: MINERALS</b>		<b>Category Code: 800 – General Minerals comments</b>
<b>Letter #:</b> 274	I would be opposed to any restrictions on the travel plan that could lead to restrictions on mineral or timber development (mining, exploration or logging).	
<b>Response:</b> Access to explore for and develop legitimate mineral prospects, unless entry is prohibited through withdrawal or other statutory prohibition, is provided for under the General Mining Laws. Travel management determinations made through this analysis does not affect such rights under the General Mining Laws. Neither does this analysis and subsequent determinations alter conditions under which access for timber management could be considered. That is governed by Forest Plan management area direction.		

## OUTSIDE SCOPE COMMENTS/RESPONSES

<b>Subject Code: OUT</b>		<b>Category Code: 900 – General comments outside scope</b>
<b>Letter #:</b> 27	FWP would recommend the incorporation of a food storage order into the travel plan.	
137	The Highwoods seems to have an overly high use by bikes. On my many occasions in the Highwoods, all I seem to hear is motors running, while I am trying to get a peaceful quiet experience. I would like to see more of these areas available for horse and walking, and less of motorized.	
626	Because I admire the hard-working men and women who work locally for the Forest Service, I am reluctant to criticize the proposed draft travel plan for the Beartooth District. However, I must be critical as, in my opinion, almost all of the alternatives threaten to continue the destruction of the forests through ever-increasing use of motor vehicles.	
<b>Summarized Comment:</b> Comments ranged from inclusion of food storage orders in the decision, to concerns about other mountain ranges on the Forest, and travel planning efforts being conducted on other National Forest.		
<b>Response:</b> The Lewis and Clark National Forest is considering a food storage order that would apply to the analysis area, but this travel planning effort is not the appropriate venue to address that issue.		
Travel management planning for the Highwood Mountain range was completed in 1993, and we do not intend to revise that plan at this time.		

## PLANNING PROCESS COMMENTS/RESPONSES

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>
<b>Letter #:</b> 190	You have all these proposals to give this area to one group or another. Why is this necessary? Why must the travel plan change at all?	
<b>Response:</b> The DEIS Purpose and Need section (DEIS pages 3-5) explains why we are conducting this travel management analysis. Alternatives include the No Action alternative (Alternative 1) that would not change the travel plan from that currently in place. That is a viable alternative along with the other alternatives proposed.		

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>
<b>Letter #:</b> 638	I remember your statement at one of the early scoping meetings that you promised a quality motorized recreation experience would be preserved. Unfortunately, several of you staff members have told me that you have stated that either Deep Creek or Pilgrim Creek would be non-motorized. Why waste everyone's time and get their hopes up if your mind is already made up?	

8	Apparently this is a top down directive that overrides reasonable assessment of the situation as indicated by the statement "In July 2005, Forest Supervisor Spike Thompson announced the new travel plan would include large blocks of land, up to 100,000 acres, for foot and horse use, as well as large blocks for motorized recreation <a href="http://www.wildmontana.org/islandranges.html">http://www.wildmontana.org/islandranges.html</a> ). This management level direction must have guided the EIS team and built the expectation for a radical change in use of the area. The NEPA process should have been an issue driven process tasked to address the three significant issues listed above [1. perpetuating the historic use of the area for motorized recreation; 2. addressing the growing need for more motorized access and recreation, and 3. addressing the need to mitigate for the cumulative effects of all past, present and reasonable foreseeable motorized access and recreation closures]. Instead, the process has been seriously tainted by a predisposed goal to convert large blocks of the project area from multiple-use and motorized to non-motorized and de facto wilderness.
168	Secondly I ask that you remain committed to your district's earlier statement. Recognizing the imbalance of trail uses and the heavy impacts from motorized use on forest resources, Forest Supervisor Spike Thompson announced in July 2005 that the travel plan would include several large blocks of land (over 50,000 acres) for hiking and horseback riding, as well as large blocks of land for motorized recreation.
<b><u>Generalized comment:</u></b> Several respondents commented on statements made by the Forest Supervisor in regard to consideration of large block(s) of land that would be identified for non-motorized uses. Some felt such statements prejudged the analysis while others asked that the Forest Supervisor remain committed to that strategy. Another felt that people's time was wasted if such an approach was already determined.	
<b><u>Response:</u></b> The Forest Supervisor did say the proposed action would include a large block of non-motorized land. Over 1½ years of dialog with interested parties on travel planning has also clearly revealed a desire on the part of motorized users for quality motorized recreation opportunities, and, on the part of non-motorized users, for block(s) of quiet, non-motorized trails. The Forest Supervisor has stated that such will be the case for consideration of the final decision.	

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>
<b>Letter #:</b> 8	The Forest Service has only addressed less motorized access and less motorized recreational opportunities. The alternative formulation and decision-making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities. Therefore, the range of reasonable alternatives considered is inadequate.	
346	The FS failed to provide an alternative that maximizes recreational use on the forest. Please create an alternative that at least doesn't reduce motorized vehicle trail mileage.	
555	The Forest Service failed to provide alternatives that optimize recreational use of the forest.	
613	Unfortunately, the Forest Service failed to provide an alternative that maximizes recreational use on the forest. Please create an alternative that at least does not reduce motorized vehicle trail mileage.	
<b><u>Generalized comment:</u></b> Several commentators felt the forest was only promoting less motorized opportunities and was not considering an alternative that maximized recreational use on the forest. They asked that the forest consider an alternative that did not reduce motorized vehicle trail mileage.		
<b><u>Response:</u></b> The forest has been in dialog with many recreational users throughout the analysis process. We received alternative proposals from both motorized proponents and non-motorized proponents and incorporated those into the analysis. Alternative 3, presented by motorized user groups, actually identified fewer motorized mileage than Alternative 1, which took into consideration non-system existing routes that, under the 3 State OHV decision, would be open to motorized uses. All these alternatives were analyzed in the EIS.		

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>
<b>Letter #:</b> 33	[t]he DEIS was submitted for public review and comment. However, as written the DEIS is: (1) poorly organized and extremely difficult to read; and (2) fails to provide enough information, and even accurate information, necessary to provide the public with an opportunity to submit meaningful public comment. Indeed, most of the DEIS's analyses are in the "project record" and not included in the DEIS.	

264	I don't think the FS should expect their constituents to have to buy computers, new software etc. just to submit comments on projects. Perhaps a 20 to 30 page summary of the Draft EIS would suffice for most of your constituents.
8	A 400+ page draft EIS is too much for the general public to understand and participate in. Coupled with the current number of other ongoing actions shown in Table 2 the situation is overwhelming. The size of the DEIS document is being used as a mechanism to overwhelm the public and allow the agency to effectively ignore the needs of the public to motorized access and motorized recreation. Council on Environmental Quality regulations for the proper implementation. The text of final environmental impact statements (e.g., paragraphs (d) shall normally be less than 150 pages and for proposals of unusual scope or complexity, shall normally be less than 300 pages.” The agency is ignoring the page limitation and the DEIS is way beyond what the public can process.
<b><u>Generalized comment:</u></b> Several commentators felt the DEIS was too long and difficult to read. One said the forest was ignoring page limitation requirements put forth by the Council on Environmental Quality while another felt much of the background information for analyses should be in the document, not just in the project file. Another felt people shouldn't have to upgrade their computer software just to comment on such projects and that a 20-30 page summary should suffice.	
<b><u>Response:</u></b> It is difficult to balance between too much information and not enough, satisfying new case law determinations and providing the reader a succinct, understandable document and analysis. Much of the information the various specialists considered for their analyses is in the document itself. Things such as computer runs become part of the project record. CEQ does state that, normally, an EIS should be between 150-300 pages in length, depending on complexity and scope. Much case law has been enacted since the NEPA regulations were developed and additional analysis may be required to comply with court rulings. We do agree that more can be done to make our documentation more concise. Putting information in appendices is one way to streamline the analysis portion of the document, but does little to reduce overall bulk. We will provide a summary for the final EIS. The summary will be at the beginning of the FEIS – which will be accessible on the website or CD version by selecting that section of the FEIS. This section can be reviewed by those who don't want to read the more complete documentation.	

<b><u>Subject Code:</u></b> PLANNING PROCESS <b><u>Category Code:</u></b> 1000 – General Planning/Process	
<b><u>Letter #:</u></b> 8	<p>We are concerned with the way that comments are being used by agencies in the decision-making process. Agency management has said that the total number of comments received during the process is considered during the decision-making. There is a clear indication that decisions are being made based on those interests producing the most comments. We strongly disagree with a decision-making process using comments as a voting process where the most comments wins the most trails and recreation opportunities because motorized recreationists and working class citizens have a low participation rate in the NEPA process...</p> <p>Agency managers seem to be directed to close as much public land as possible to motorized visitors by a top down management directive that is conflicting with the needs of the public for multiple-use access and recreational opportunities and contrary to the laws established by congress. We respectfully maintain that the agency can not establish the motorized routes to remain open based solely on formal written public input because the process did not have a high enough level of participation by motorized recreationists to develop meaningful input.</p>
318	The process for formulating the winter plan was flawed from the beginning. ... The Little Belt, Castles, and Crazies should not have been linked to the Big Snowies resolution group. These mountains should have been discussed in a separate plan. ... The LCF didn't follow their own guidelines on public involvement. There weren't any public meetings or comments taken before drafting any alternatives. The only comment period was on the interim closure for the Winter Recreation Agreement.
<b><u>Generalized comment:</u></b> A few comments were received on the public comment process. Some felt that decisions would be made to favor those groups or individuals providing the bulk of the comments, that agency direction was to close as much land as possible to motorized uses, and that there wasn't enough participation from motorized groups to develop meaningful input. Another felt the forest didn't provide adequate public comment opportunities on the winter recreation plan and that including the Little Belt, Castles, and north Crazies as part of negotiation discussion resulting from the appeal of	

the Big Snowies travel management plan was improper.

**Response:** The decision-maker has maintained an open-door for anyone wishing to express opinions or provide comment and has heard and considered the gamut of public desires for travel planning. No tally of “votes” for any particular alternative or approach has been taken. Motorized groups have had ample opportunity for comment as have non-motorized user groups.

The groups involved with the winter resolution resulting from the Big Snowies travel plan appeal represented a spectrum of forest users, including a number of snowmobile groups, cross-country skiers, and non-motorized groups. Principals for the various interest groups were responsible for sharing information with their affiliates as well as receiving and sharing comments from those groups with the rest of the resolution group. Discussions took place for over a year, during which Forest Service members also visited with the organizations. The group agreed to those areas to be included in the winter recreation agreement, and interim adjustments were made until the current travel planning effort could be completed. The winter recreation agreement for the King’s Hill and Middle Fork Judith areas were incorporated into winter alternative 2 in this travel plan. The public has had the opportunity to comment on this alternative. The Forest retains the authority for issuing a final decision for winter travel management through this planning effort.

<b>Subject Code:</b> <i>PLANNING PROCESS</i>	<b>Category Code:</b> 1000 – General Planning/Process
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<b>Letter #:</b> 645	Planning should be based on an accurate and current inventory of both roads and trails, active and inactive, used, unused or just not maintained for motorized or stock use, but still usable for foot traffic.
8	Non-system roads and trails are a significant OHV recreation resource. However, non-system roads and trails are most often, not inventoried and considered in the travel management process. Failing to identify and consider non-system roads and trails in the travel management process will underestimate the existing use and needs of motorized recreationists. NEPA requires adequate disclosure of all impacts and this is not happening with respect to all existing non-system roads and trails that are in use by the public.
17	It seems imperative that in order to present a proposed plan, an accurate inventory of official, authorized and trails is imperative before determining what should be open or closed to the various uses.

**Generalized comment:** Several comments were received expressing a need for a complete and current inventory of all roads and trails, including non-system routes, in order to consider them through the analysis.

**Response:** The Forest asked for assistance from the public in identifying non-system routes for consideration in the analysis. We received mapped and GPS data from trail bike rider groups on non-system routes they were aware of and we incorporated this information into our databases. Additional inventories were conducted by the forest. All available information on non-system road and trail locations were incorporated into the analysis and are depicted on the Alternative 1 map. Additional fine-scale information can be viewed by zooming into specific locations on the electronic version of the map. Throughout the process, the forest indicated they would consider any new information on route locations. We are working from the best available data we have to date.

<b>Subject Code:</b> <i>PLANNING PROCESS</i>	<b>Category Code:</b> 1000 – General Planning/Process
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<b>Letter #:</b> 42	It is not clear to us why the Lewis & Clark National Forest is not reevaluating the adequacy of its Goals, Objectives, Standards and Guidelines for directing future management activities related to public access and travel in the Little Belt, Castle, and North Half Crazy Mountains with this Travel Plan? Does the Forest believe that its current Goals, Objectives, Standards and Guidelines are adequate, and no revision is needed? It would be helpful to include the current Goals, Objectives, Standards and Guidelines that guide public access and travel in the FEIS, perhaps as an appendix, so travel management direction for this area were disclosed and could then be evaluated.
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**Response:** The Lewis and Clark Forest Plan contains management standards for travel planning and maintenance and construction of roads, trails and other facilities. These standards speak to operational parameters to be employed to minimize adverse impacts to soil and water resources from roads and

trails. We will include information on these standards in the FEIS. The forest did not feel it necessary to amend the plan with additional, or different, standards as a result of travel planning.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1000 – General Planning/Process

**Letter #:** 602 | Please be careful about putting too much stock in volunteer workers to compensate for the lack of funding because there are no "teeth" in requiring the fulfillment of the projects that "lip service" made sound good.

**Response:** This is a valid concern. Partnerships for such things as long term maintenance of roads or trails require much commitment and maintenance themselves.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1000 – General Planning/Process

**Letter #:** 398 | Why are you changing things in such a small area? I don't see any other forests being considered in the proposal.

**Response:** Other National Forests have been or will be engaged in travel management planning as well. The Gallatin Forest just completed their travel plan that includes portions of the Crazy Mountains adjoining the Lewis and Clark Forest. The Helena Forest has also completed travel plans on portions of that forest. While we have coordinated with neighboring administrative units, the Lewis and Clark's travel plan covers only those lands administered by the Lewis and Clark forest. We have, however, considered travel planning across the whole forest and have been cognizant of how travel management determinations in one area of the forest, like the Rocky Mountain Ranger District, can affect use of other areas.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1000 – General Planning/Process

**Letter #:** 8 | Natural conditions should be used as the benchmark for the test of impacts on resources. All impacts should be measured against a realistic assessment of natural conditions including natural sound levels, sedimentation rates and natural events such as fires, glacial periods, and floods. We request that guidelines be developed to help determine if perceived impacts are significant or insignificant.

5 | The DEIS does not provide a sufficient baseline data of environmental effects with which to compare and contrast alternatives or assess the affects of the proposed action. However, there is virtually no baseline data with which the public may compare and contrast the Proposed Action and Alternatives over the current condition.

18 | The main concern that we are hearing over and over from snowmobilers is that many of the proposed closures are not based on resource issues.

**Generalized comment:** A few commentators requested that effects of motorized uses be measured against baseline or natural resource conditions, such as natural sedimentation rates, fires, or floods, in order to make a more realistic assessment of impacts. Another felt proposed snowmobile closures were not based on resource issues.

**Response:** The DEIS contains discussion of existing conditions for a variety of resources, including water and soil, wildlife and fish, cultural resources, recreational uses, and roadless and wilderness characteristics. The EIS, for example, describes natural characteristics for water quality (DEIS pages 196-198), including effects of past fire and floods. While the analysis did not attempt to quantify such parameters as the range of natural variation in sedimentation from all possible natural forces, it does recognize that these forces have resulted in the current conditions. The analysis notes that watersheds, even when undisturbed by human influences, are not static systems (DEIS page 207) and natural disturbances can result in pulse effects, but while these can be moderate to high in magnitude, they are generally low in frequency. It also notes that such natural disturbances will continue to influence hydrologic and erosional processes (DEIS page 217) and that roads and trail systems have less of an impact to soil and water in the analysis area than natural disturbances such as fire and flood (DEIS page 218). The analysis notes that road and trail stream crossings are a direct effect to water resources, and as such, uses that criterion for analyzing the alternatives.

Restrictions under any of the alternatives may be based on either resource or social criteria; not all proposed restrictions are strictly for resource reasons.

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>	
<b>Letter #:</b> 19	We would ask that the Record of Decision include: a statement supporting mixed use designation where appropriate; set a reasonable date for the engineering review process to be completed; set a date the public could expect to see the order issued.		
<b>Response:</b> Possible mixed, or dual, use on certain routes will be discussed in the decision document. An engineering review will be completed prior to designating any route for mixed use. Timeframes for completion of any engineering review will depend on available resources.			

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1000 – General Planning/Process</b>	
<b>Letter #:</b> 8	The document and decision must clearly disclose on maps and tables and summarize all existing areas and existing roads and trails that would be closed to motorized access and motorized recreationists. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided and the public will not be informed and the public including motorized recreationists will not be able to adequately participate and comment.		
<b>Response:</b> The decision document will contain summarized information on areas and routes that would be closed to motorized access. Data tables will contain information on how each route was treated in the decision. Depending on the volume of the data, it may be displayed in the ROD, or it may be available for public review as part of the project record. Each road or trail is “mile posted” into numerous segments, resulting in very large data tables to display the decision for each route segment.			

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1001 – NEPA Compliance</b>	
<b>Letter #:</b> 522	NEPA and its implementing regulations require: consider a "no action" alternative, 40 CFR 1502.14(d); and the agency must designate a preferred alternative, 40 CFR 1502.14(e). This process was not followed in this DEIS NEPA's direction for a preferred alternative sets the stage for significant public involvement. The identification of a preferred alternative creates a starting point. We believe the absence of a preferred alternative as mandated in 40 CFR 1501.14(e) and in FSH 1909.15, Chapter 10, #16, has discouraged public participation and comments. The DEIS, with 400 pages, 20 small maps and 8 large maps is an intimidating document. With the time constraints of everyday life, the lack of a preferred alternative for this DEIS has left the general public with the near impossible task of trying to read, digest and understand four summer and three winter alternatives, and make intelligent and meaningful comments.		
5	It was our impression that Alternative 1 was NOT an "action alternative" from the lack of detailed consideration and analysis compared to the other alternatives. The agency is lawfully required to formulate and analyze an alternative that, within the extent allowed by law and regulation, maximizes motorized recreational uses. Even if one considers Alternative 1 a viable "action alternative," the DEIS has failed to do so.		
5	The distinction between the proposed action and a preferred alternative is not accurately disclosed or described in the document. The DEIS indicates that no preferred alternative had been selected by the agency. What was the rationale for not identifying a preferred alternative?		
19	The agency must designate a preferred alternative. This process was not followed in this DEIS. NEPA's direction for a preferred alternative sets the stage for significant public involvement. The identification of a preferred alternative creates a starting point, with one complete set of ideas to read and digest. We believe the absence of a preferred alternative as mandated in 40 CFR 1501.14 (e) and in FSH 1909.15, Chapter 10, #16 has discouraged public participating and comments. The DEIS, with 400 pages, 20 small maps and 8 large maps is an intimidating document. With the time constraints of everyday life, the lack of a preferred alternative for this DEIS has left the general public with the near impossible task of trying to read, digest and understand four summer and three winter alternatives, and make intelligent and meaningful comments.		
38	NEPA's direction for a preferred alternative sets the stage for significant public involvement. The identification of a preferred alternative creates a starting point. With one complete set of ideas to read and digest. If an area or item is in question, a person then has the option of reviewing and researching other alternatives, commenting on the specific item. We believe the absence of a preferred alternative as mandated in 40 CFR 1501.14(e) and in FSH 1909.15, Chapter 10#16, has discouraged public participation and comments.		

**Generalized comment:** Several commentators felt the No Action alternative (continuing with the existing travel plan) was not adequately considered. Several also stated that NEPA mandated a preferred alternative be identified and that the lack of a preferred alternative left the public with a near impossible task of trying to read, digest and understand 4 summer and 3 winter alternatives and make meaningful comments.

**Response:** The environmental effects of Alternative 1, no action, is displayed in the DEIS for the resources analyzed (for example, effects to water quality from continuing with the current travel management is described in the DEIS on pages 208-210; effects of the no action alternative to wildlife are described for a variety of issues, such as open road density standards [DEIS page 243], elk security and habitat effectiveness [DEIS pages 248], and other seasonally important wildlife habitat [DEIS pages 254, 256]). A comparison of effects of implementing each of the alternatives, including the no action alternative, are displayed in Chapter 2.

40 CFR 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative, if one or more exists, in the draft statement, and identify such alternative in the final statement ...”. If the responsible official has no preferred alternative at the draft EIS stage, a preferred alternative need not be identified there (see CEQ 40 Most-Asked Questions, Federal Register Vol. 46, no. 55 pages 18026-10830, 3/23/81). Identifying a preferred alternative may give an indication of an agency’s orientation on a proposal or issue, but it can also result in a reviewer concentrating exclusively on a preferred alternative to the exclusion of other alternatives, when they, too, merit consideration and comment. Quite often a decision-maker may take aspects from more than one alternative to develop a decision. Limiting review and comment to a preferred alternative may not provide a decision-maker with valuable comment on other alternatives. Page 26 of the DEIS explains why a preferred alternative was not identified.

<b>Subject Code:</b> <i>PLANNING PROCESS</i>	<b>Category Code:</b> 1001 - NEPA Compliance
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<b>Letter #:</b> 33	User created routes were created without agency authorization, environmental analysis or public involvement and do not have the same status as NFS roads and trails included in the forest transportation system (70 FedReg 68268). These illicit routes were illegally created, never authorized by the USFS, and have never undergone any form of NEPA analysis. As such, these user created routes must be immediately closed, repaired, and excluded from the USFS transportation network. The USFS cannot and should not legitimize such routes or reward OHV users for their illegal and destructive behavior by now designating such routes as part of the new transportation system. ...Because these user created routes have never undergone a NEPA analysis or Endangered Species Act (ESA) and NHPA consultation, the USFS will need to now (after the fact) take a hard look at how such routes have directly, indirectly or cumulatively affected the natural resources, wilderness character, and non-motorized uses in the region and complete formal section 7 consultation under ESA.
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**Response:** The commentator may be stating that even those routes that are currently adopted into the Forest transportation system, but may at one time have been created largely by repeated use on the ground (as opposed to being constructed by the Forest Service) should be closed and excluded from the transportation network. This is really not practical. Some of these routes have been adopted into the system and are considered for maintenance like all other system routes; they may have been incorporated as a result of previous travel management analyses and decisions. These routes, along with all other routes in the system, have been considered as part of existing conditions that set the stage for the environmental analysis. Some non-system routes may even be considered for inclusion in the forest’s transportation system through this environmental analysis. They will have been analyzed for environmental effects and considered in any ESA consultation conducted.

<b>Subject Code</b> <i>PLANNING PROCESS</i>	<b>Category Code:</b> 1002 – Authority
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<b>Letter #:</b> 15	The DEIS violates the OHV rule. Put simply, the rule requires the Lewis and Clark National Forest to identify all routes, trails, roads and areas on the Forest where OHV use might occur, and designate the routes, trails, roads and areas where OHV use may occur after documenting that such a designation will minimize: 1) damage to soil, watershed, vegetation and other forest resources, 2) harassment of wildlife and disruption of habitat, 3) conflicts between users, and 4)
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	conflicts between motor vehicle uses. The DEIS simply does not do this. ... The DEIS does not disclose how the travel plan will comply with the direction in Executive Orders 11644 (1972) and 11989 (1977), which provide in part that: “Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effect, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.” There are many passages in the DEIS that concede that OHV use will damage soil, vegetation, wildlife, wildlife habitat and historic resources. These areas should immediately be placed off limits to OHV use. Instead, the DEIS allows use to continue, and even expands use in some areas.
<b>Response:</b> The Executive Orders cited give an authorized officer the ability to immediately close trails or areas should it be shown that off-road vehicle use is causing resource damage, without having to conduct a NEPA analysis. The current analysis takes many factors into consideration in the EIS. It does recognize impacts that motorized uses have had, or can have, on resources. The decision-maker will consider identified and potentially unmitigatable resource impacts when determining a final travel management strategy.	

<b>Subject Code:</b> <i>PLANNING PROCESS</i>		<b>Category Code:</b> 1003 – 1988 Travel Plan as Baseline
<b>Letter #:</b> 282	Designed to accommodate the handlebar width of a 2-wheel trail bike, the 40 inch rule has been in effect since the mid-1970s. Despite the 40-inch rule, the 1988 travel plan authorized the use of vehicles up to 50 inches wide to accommodate all-terrain vehicles. By doing so, the 1988 travel plan failed to comply with the public process for introducing new vehicles to the forest as well as to address the impacts of vehicle use.	
635	[t]he new travel plan must not grandfather-in trails or trail uses that were not authorized in past travel planning.	
<b>Generalized comment:</b> A few commentators felt the existing travel plan was illegal because it authorized motorized trail travel for vehicles up to 50 inches wide. Others stated that the new travel plan must not grandfather-in routes that were not authorized in past travel planning.		
<b>Response:</b> We understand that some feel the agency should “tackle travel planning with a clean slate”, which they interpret variably as starting from a baseline of no motorized use or from a starting point of no ATVs or trail vehicles over 40 inches in width. The DEIS recognized the concern a few commentators raised on use of the 1988 travel plan as a starting point and addressed it in Chapter 2, page 21. The alternative of considering some other “starting point” for this travel plan analysis was not considered in detail. Information on the history of travel planning is contained in the project file.		
Under the 2001 3-State OHV decision, routes that existed on the ground at the time of the decision became open to motorized use until a travel management plan was completed. Therefore, this rule essentially grand-fathered undetermined routes until this analysis is completed. This assessment considered all known trails, some of which may have been user-created, and the decision will specify which routes will be retained as part of the Forest’s transportation system. The IDT considered whether some undetermined routes (that may have been user-created) were in better locations (from a resource or safety standpoint) than those which are currently part of the trail system.		

<b>Subject Code:</b> <i>PLANNING PROCESS</i>		<b>Category Code:</b> 1004 - Monitoring
<b>Letter #:</b> 42	We also recommend that mechanisms for public disclosure of the monitoring analysis and the decisions for the Travel Plan be provided. The roles of the FS, other Agencies, Independent science, and the public should be identified.	
635	Adequate signs and travel maps must make it clear that travel off trail by ORVs is prohibited. The travel map must state what the penalties are for creating illegal trails and for driving off trail. There must be a clear plan for monitoring and enforcement of the travel plan.	
282	An enforcement and monitoring plan should be prepared for the final DEIS and it should incorporate large non-motorized blocks as a principle means of realistically addressing the limited enforcement and monitoring capabilities of the agency.	

15	The Forest Service incorrectly assumes that monitoring is discretionary. The transportation Rule makes it clear that monitoring is an integral part of travel management; the Plan must assure the public and decision maker that monitoring will take place.
8	If motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement to each resource area.
25	There should be an effective program for monitoring, evaluation and adaptive management to assure that the effects of travel management are identified and that management is modified where necessary to mitigate adverse effects. the DEIS, however, does not appear to clearly state a commitment or assurance that adequate monitoring will be conducted to identify effects from travel management or a commitment that effects of travel management will be mitigated with a monitoring and adaptive management program.
42	The DEIS, however, does not appear to clearly state a commitment or assurance that adequate monitoring will be conducted to identify effects from travel management or a commitment that effects of travel management will be mitigated with the monitoring and adaptive management program. EPA believes monitoring and evaluation should take place with an adaptive management approach for all resource conditions. We see no clear commitment to such as approach in the Little Belt, Castle, and North Half Crazy Mountains Travel Management Plan.
<b>Generalized comment:</b> Several commentators asked that a monitoring and enforcement plan be developed for travel management and that results of monitoring be made available for public disclosure. Several asked that, through monitoring, the effects of travel management be disclosed and that mitigation measures be identified and implemented to address adverse effects.	
<b>Response:</b> The DEIS at Appendices D and E, page 352-354, identified mitigation measures to be employed for travel plan implementation and monitoring actions to be taken to provide data for addressing certain Forest Plan monitoring elements, such as effects of activities on watershed and aquatic conditions.	

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1005 - Agreements</b>
<b>Letter #:</b> 383	That last comment period on the winter travel plan was technically in error. The draft plan should have preceded any 'negotiations' for use restrictions. Without it as a basis, no restrictions are valid, let alone 'negotiable'. .... Until the draft EIS is formally considered, there should be no winter closure for motorized use. Jefferson Bowl, in particular, should not be closed to winter motorized use under any circumstances. It is a premier place for families to snowmobile. The Monument-Loop should be kept open even if it requires the FS and users to work out an agreement for land owners.	
<b>Response:</b> We assume the commenter is referring to the winter recreation agreement negotiated by a number of user groups, including the Montana Snowmobile Association, Montana Wilderness Association, Great Falls Cross Country Club, Great Falls Snowmobile Club, and the Little Belt Snowmobile Club, that provided for interim implementation of certain winter use restrictions or allowances in the Little Belts until the travel plan was completed. The Forest Supervisor intends to comply with the terms of the agreement, which has also been included as part of the court order in the Big Snowies travel management lawsuit, until a final decision is made through the current travel planning process.		

<b>Subject Code: PLANNING PROCESS</b>		<b>Category Code: 1005 - Agreements</b>
<b>Letter #:</b> 240	I attended the resolution / negotiation meeting between MWA and MSA. Areas of this process that continue to be concern: the snowmobile community as a whole was not aware of the process taking place, were not informed as the talk went along, and do not support the agreement made. There was not a consistent representative from the agency at the meetings. There was no input from property owners.	
17	Of concern to the Cross Country Club are comments it has heard that members of some of the other user groups don't support Alternative 2, the negotiated suggested proposal. By signing that winter agreement, the Club understands the groups are being asked to work together to continually monitor and in particular, with the lower two miles of the O'Brien Creek Trail, work together to develop a plan for a parallel trail system there. The Club, committed to this agreement, is concerned that those others not in support could jeopardize the success of such a plan, if implemented, and urges all user groups that were signatory to this agreement to continue to work out any disagreements in order for this plan to succeed.	

18	<p>The GFSC signed an agreement on April 27, 2004 after two years of negotiations with several interested parties. If our vote to sign the agreement were taken today, it would not pass. ... Throughout the negotiating process, we were told several times by the USFS that the agreement would merely be a starting point. Representatives from our club initially were told to prioritize our riding areas but were not made aware of the binding nature of the negotiations, including the Special Order Interim closures. ... By the time we saw the agreement, we had very little time to analyze it and we felt pressured by MSA (Montana Snowmobile association) to sign. ... We are hearing from more and more snowmobilers (some members, some not), that area they really enjoy are proposed to be closed to motorized use. ... Because the agreement was only a “starting point” we thought that by participating in the process we could successfully lobby to get back some of the more popular riding areas.</p>
<p><b><u>Generalized comment:</u></b> A couple parties to the negotiated agreement for management of winter recreation in portions of the Little Belts expressed concern over that process. One group felt they weren’t made aware of the binding nature of the agreement. Another felt the snowmobile community was not informed adequately of the process and results. One was concerned that the success of the agreement depended upon all the parties working out disagreements and urged that that happen.</p>	
<p><b><u>Response:</u></b> The winter recreation agreement resulted from negotiations by parties to appeal of the Big Snowies travel management plan. The agreement became a starting point for the proposed action for winter recreation. (See DEIS pages 4, 19). Other winter alternatives have been identified as well. All parties to the negotiations, as well as other publics, have the opportunity through this analysis to comment on the winter agreement along with the other winter travel options. The Forest Supervisor retains the authority to select any one, or part, of the alternatives. The interim winter recreation agreement will remain in place until a this travel management decision is made.</p>	

<b><i>Subject Code:</i></b> PLANNING PROCESS		<b><i>Category Code:</i></b> 1006 - Errata	
<b><i>Letter #:</i></b> 318	Page 51-Table III-I: None of the Columns add up to the same acreage. Using ROS acreage for motorized use is misleading as they are restricted to the length and width of a road or trail.		
<p><b><u>Response:</u></b> An error in acres of Roaded Natural ROS setting was found in the Castle Mountains for Alternative 3 and the table will be corrected. That error made alternative 3 short about 400 acres. Total acres for other alternatives are well within 2 acres of each other, or about 0.0002%.</p> <p>Motorized ROS settings include motorized roads and trails, and areas within ½ mile on either side of them. These are the areas considered influenced by motorized use, including the sounds of motorized use and the sight of motorized users and roads and trails they use. This ½ mile buffer follows standard mapping direction in the 1986 ROS Book, a Forest Service publication use for ROS mapping direction.</p>			

<b><i>Subject Code:</i></b> PLANNING PROCESS		<b><i>Category Code:</i></b> 1006 - Errata	
<b><i>Letter #:</i></b> 481	A substantial error of the EIS is its use of Forest-wide visitor use data and projecting those use levels to the Little Belts. It is fallacious to use Forest-wide data in a plan that is specific to a much smaller part of the Forest.		
<p><b><u>Response:</u></b> See also response to economic comments. Since the DEIS the Lewis and Clark National Forest has interviewed nine off-road equipment dealerships surrounding the Jefferson Division. The interview collected information regarding their local employment and payroll, the number of off-road machines sold, the gross sales of off-road equipment and accessories, geographic location of the customer base, and the if their customers use the Lewis and Clark National Forest. The interviews were summarized and the results are presented in the final environmental impact statement.</p>			

<b><i>Subject Code:</i></b> PLANNING PROCESS		<b><i>Category Code:</i></b> 1006 - Errata	
<b><i>Letter #:</i></b> 641	A correction needs to be made to an error of road markings in section 35, the trail extending down to private property from the forest. Currently, your map is using legend #3 closed YL to vehicle, ATV, Trail bikes, Snow Rest. Oct 15- Dec 1. The correct legend should be #5 which is closed YL to vehicle, seasonal Restr ATV, Tbike, Snow Oct 15-Dec 1 which is how it is currently.		

**Response:** Thank you for bringing that to our attention. While we haven't changed alternative maps to reflect all small errors, we been tracking these suggestions, and you have visited with the District Ranger in this regard. Alternatives in the DEIS consider travel management options for this route and routes connecting to it (see also response to comments on alternatives).

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1006 - Errata

**Letter #:** 8 | Every planning action "re-invents" the line weights, color, and line styles for the different motorized and non-motorized road and trail designations. A national mapping standard for travel planning actions must be developed starting with proposed action in order to address this inadequacy and the environmental justice issue associated with it.

12 | ...the mapping and data available is very difficult to interpret. We encourage the FS to take more time to develop better maps and data, and to work with local forest users.

**Response:** We understand that the alternative maps in the EIS contain a lot of information, which is difficult to portray on maps of a manageable size. The electronic version of the maps allows the reader to zoom in on specific areas of interest. We will be changing and reprinting the alternative maps for the FEIS to hopefully make them more useful. The record of decision will contain a map of the selected action. We will consider comments on map clarity for development of the final decision map.

There are national mapping standards for the development of a Motorized Vehicle Use Map (MVUM) which will be the official map identifying routes open to motorized use. These maps will be similar for all units, allowing for seamless motorized route coverage across adjacent forests or other administrative units. The MVUM map, however, will only show motorized routes. Additional maps showing non-motorized routes will be available, most likely displayed on the Forest Visitor map as they are currently, and perhaps by geographic area maps.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1006 - Errata

**Letter #:** 22 | Eastern district of the Castle Mountains, many roads were not mapped and properly documented. Therefore the public cannot weigh all the facts to create a valid opinion. Many undocumented roads have been used for decades by the public.

35 | The Castle Mountains is the DEIS didn't show all existing roads for off road traffic, including game retrieval and fuel retrieval (fire wood), in the Limestone areas and Wet Stone areas in the east portion of the mountain range.

**Response:** The Forest asked for assistance from the public in identifying non-system routes for consideration in the analysis. We received mapped and GPS data from trail bike rider groups on non-system routes they were aware of and we incorporated this information into our databases. Additional inventories were conducted by the forest. All available information on non-system road and trail locations were incorporated into the analysis and are depicted on the Alternative 1 map. Additional fine-scale information can be viewed by zooming into specific locations on the electronic version of the map. Throughout the process, the forest indicated they would consider any new information on route locations. We are working from the best available data we have to date.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1006 - Errata

**Letter #:** 27 | Concerning the Haymaker Game Range, the road going through the Game Range is still shown in the wrong location on both the winter and summer/fall USFS maps. The road goes up Morrissy Coulee to the Game Range, then to the Forest Boundary. The Game Range is closed to public access from the day following the general rifle season through May 15. These changes should be reflected in your travel plans.

**Response:** Thank you. This mapping error has been corrected for the FEIS.

**Subject Code:** *PLANNING PROCESS* | **Category Code:** 1006 - Errata

**Letter #:** 27 | Map 11 does not indicate elk calving use in the Ming Coulee, Belt Park, lower. Tenderfoot and Tiger Butte private land areas of HD 413. Elk utilize these areas throughout the year. The map does not indicate elk winter range in the Belt Park, Ming Coulee, Tiger Butte and lower Tenderfoot Creek areas. Over the past few years, elk have readily utilized these areas as winter

	range. As mentioned, FWP and USFS biologists have met to discuss these topics many times over the past three years and have constructed updated versions of Map 11, which were not utilized in the draft EIS. If “new” data is available for big game use in these area, why is it not addressed in the draft EIS and used in the travel planning process?
<b>Response:</b> The new information provided by MT Department of Fish, Wildlife and Parks regarding elk calving use will be used for analysis purposes in the wildlife section of the FEIS.	

**RECREATION COMMENTS/RESPONSES**

<b>Subject Code: RECREATION</b>		<b>Category Code: 1100 – Opportunities for or impacts to Natural quiet/solitude (Smith River)</b>
<b>Letter #:</b> 246	Of particular interest and concern to me and my family is to limit motorized impacts into the Smith River corridor through the Tenderfoot/Deep Creek drainages. We have been fortunate to have been able to float the Smith River several times and we particularly enjoy the near wilderness experience this float provides.	
495	River Experience - Increasing the number of public motorized access points from National Forest land into the Smith River corridor beyond the current level will diminish the unique recreational experience, and reduce the solitude.	
<b>Summarized Comment:</b> Commentators generally felt there is potentially too much motorized access into the Smith River Corridor , impacting their desire for quiet and a near-wilderness experience.		
<b>Response:</b> The DEIS on pages 115, 118-122 notes the direction provided in the Smith River Management Plan and discusses potential impacts to aspects as solitude and semi primitive opportunities under the various alternatives The DEIS provides a range of alternatives, from no motorized access to the Smith River, to an increase of motorized use over the existing situation. Alternative 3 proposes to increase the number of motorized trails leading into the Smith River Corridor. Alternative 4 and 5 reduce the number of motorized trails into the Smith River. It is recognized under the desired condition in the DEIS page 118 that preservation of solitude and quiet is important.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1100 – Opportunities for or impacts to Natural quiet/solitude</b>
<b>Letter #:</b> 282	Under the 1988 Travel Plan, there are 134 miles of roads, 53 miles of motorized trails, but only 3 miles of trails reserved for foot and horse use. Under the proposed alternative, no area within the Castles would be motor-free during the winter months.	
<b>Response:</b> Page viii of the draft EIS states that Alternative 2’s “proposed winter recreation” in the Castles keeps the east 1/3 of the Castle Mountains non-motorized. Pages 19-20 of the DEIS state the same thing for both winter alternatives 2 and 3.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1100 – Opportunities for or impacts to Natural quiet/solitude (hunting)</b>
<b>Letter #:</b> 539	Most of the alternatives in the 2006 draft plan don't leave many opportunities for me to experience the silence and solitude I need when hunting.	
<b>Response:</b> Page 60 of the DEIS, Table III-7 displays the Number of blocks of Non Motorized ROS Settings Alternatives 4 provides 6 areas greater then 15,000 acres in size and Alternative 5 provides 3 areas greater then 15,000 acres in size of non motorized opportunities. Table III-3 describes many opportunities for non-motorized trails by alternative. Alternatives 4 and 5 provide the settings you’re looking for, especially in the Castles and Crazies. The Little Belts trails are primarily non-motorized in Alt. 4 and about 1/3 non-motorized in Alt. 5.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1100 - Opportunities for or impacts to Natural quiet and solitude</b>
<b>Letter #:</b> 132	Noise pollution: escaping clamor of civilization is one of the reasons many foot and horse travelers take to the road less areas. Inclusion of motorized vehicles destroys the experience. Most dirt bikes loudly testify to the lack of consideration their riders have for others or the wilderness quality.	
119	The closures reduce access for hunting, just driving to your favorite place to get away (solitude).	
D-94	More and more of our backcountry trails are being violated with noise pollution and surrounding pristine areas are compromised by the impacts from motorized users - all to the detriment of horsemen and hikers who are seeking the quiet beauty these wildlands offer. Motorized users venture deeper and deeper into quiet areas. Are all our national forest lands destined to be noisy playgrounds for the privileged at the expense of sound land stewardship for the good of all and future generations?	
8	Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access closures	
16	Gated roads in reality now quiet trails in the Little Belts. Those who want it quiet can basically go anywhere they want in the forest, on or off trails. A motorized trail bike rider has to stay on a designated trail.	
133	More public land is available to motorized use than for other recreational purposes. It is important that some public land retain some solitude away from the intrusion of motorized vehicles.	
181	It's getting to the point that areas of trail hiking and horse use is getting to be something of the past and a larger group of people using the more expensive style of transportation and of course more of a damage factor, is slowing taking the lead. The people who don't have the money but wanting to enjoy nature without the noise factor around them would want their fair share.	
234	The quiet and solitude I find in nature reinvigorates me, restores my spirits, and gives me renewed enthusiasm. The ability to relax and recuperate in the quiet of nature is essential both for my health & my soul. I share with many other Americans a love of nature and a deep need for nature's restorative qualities. However, it is impossible for me to have the experience I seek when the trails I hike are also designated for motorized use of any kind	
272	Enjoy the tranquility of nature. Alternative 2 for winter use in which most roadless areas will be non-motorized. Large blocks of forest for non-motorized use does provide an oasis of solitude.	
446	Opportunities to experience remote, restful settings still exist in these island ranges, but with the increase in the number of faster more powerful motorized vehicles capable of covering greater distances, the opportunities for a traditional, motor-free experience have been greatly diminished during the summer & winter. With the increased numbers of motorized vehicles have come more noise, more damage to trails, & more noxious weeds. Wildlife has been displaced & more conflicts have arisen with horseback riders, hunters, & hikers. There is a need to respond to the changing use in the forest & accommodate foot & horse use in a manner that genuinely provides a spectrum of recreational opportunities	
404	Motorized use disproportionately affects non-motorized use due to noise levels. An entire watershed is the soundscape for only one user.	
33	Individuals seeking natural quiet and solitude and a more primitive, wilderness or hunting experience in the Lewis and Clark National Forest cannot share the trails with the sights, smells, and noises of motorcycles and ATVs. by providing blocks of "natural quiet" areas managed specifically for their wilderness character and off limits to the noise, exhaust, and speed of dirt bikes, jeeps, and ATV	
615	This travel plan decisions made today will determine the future of these island range forests. Allowing vehicle use to become better established will only make it more difficult to create quiet areas in the future. The number of people utilizing these national forests is sure to increase as central Montana's population increases. And with increasing numbers of faster, more powerful motorized vehicles covering greater distances, the opportunities for a motor-free experience will be diminished.	
568	As a land owner on Dry Wolf Creek, I commonly see children as young as ten riding motorbikes and 4-wheelers at excessive speeds, without helmets, and in a reckless manner. All too often, these are the same individuals who have unruffled engines and who seem to enjoy	

	destroying the peace and quiet of the mountains with their shrieking engines.
538	I moved to Montana from Tennessee several years ago because of the quality of life. This includes the opportunities for quiet outdoor recreation that abound throughout the state. Unfortunately, the Little Belt, Crazy, and Castle mountains seem to be the Forest Service's "sacrifice" areas.
<b>Summarized Comment:</b> Generally most comments which addressed the natural quiet/solitude issue (assigned category code 1100) felt that there is a lack of areas and trails which offer a pure sense of quiet/solitude in the travel plan analysis area. This opinion was countered by the idea that any existing road closed to motorized use is essentially quiet and offers the necessary areas for quiet/solitude opportunity. Another felt that the non-motorized user can get off the trail, unlike motorized users, and experience solitude. A broader response of the quiet solitude issue was that no matter what the circumstances, sounds from motorized sources such as airplanes exists even in the most remote areas. Others felt that it is not reasonable to expect absolute quiet in areas intended for multiple use.	
<b>Response:</b> The forest recognizes the need to provide a variety of settings for the various recreationists to achieve enjoyment from their National Forest. These travel management objectives are described on pp. iv and v. Alts 4 and 5 provide many opportunities for quiet/solitude. P. 60 of the DEIS, Table III-7 displays the Number of blocks of Non Motorized ROS Settings. Alternative 4 provides 6 areas greater than 15,000 acres in size and Alternative 5 provides 3 areas greater than 15,000 acres in size of non motorized opportunities. Table III-3 describes many opportunities for non-motorized trails by alternative. Alternatives 4 and 5 provide the settings you're looking for, especially in the Castles and Crazies. The Little Belts trails are primarily non-motorized in Alt. 4 and about 1/3 non-motorized in Alt. 5.	

<b>Subject Code: RECREATION</b>		<b>Category Code: 1100</b>
<b>Letter #:</b> 8	We encourage all jurisdictions to adopt the stationary sound test procedures as set forth in the Society of Automotive Engineers J-1287 June 1980 standard. Public land-use agencies could establish reasonable sound limits and use this approach to address the sound level issue.	
497	If you implement 70 decible sound restrictions (as in Yellowstone NP) at which point the motors can't be heard at over a few hundred feet, all can use all of the areas of the LCNF with very little problem that are outside that present wilderness areas.	
<b>Summarized Comment:</b> If the Forest Service adopted sound restriction requirements following standardized methodology, we'd reduce the sounds of motorized users and reduce public concerns about noise from OHV's.		
<b>Response:</b> There is presently a House Bill 332 introduced into the legislature that would place noise limits on motorcycles and ATV's operating on the state's roads and highways, as well as on public lands. We are working with those that have introduced this legislation, and see it as a positive development. There are several forests on the west coast that have opted for noise limitations on particular forests. Through the EIS analysis we designate specific trails where motorized use is permitted, and publicize those trails to the public so that all can know what to expect as they use those trails. This helps separate those for whom OHV noise is a problem, from those with louder OHVs. It would be an administrative decision, not a NEPA(National Environmental Policy Act) decision, to limit noise of motorized vehicles on the Forest, and it is certainly something that would be considered if our monitoring indicated that OHV noise was a big issue.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1101 – (Snowmobiling) opportunities for activity or detriment caused by activity</b>
<b>Letter #:</b> 284	On page 112 the majority of snowmobile use in North central Montana is concentrated in the DEIS area, but according to Page 101 the majority of people polled said Overcrowding was not and issue	
383	Until the draft EIS is formally considered, there should be no winter closure for motorized use. Jefferson Bowl, in particular, should not be closed to winter motorized use under any circumstances. It is a premier place for families to snowmobile. The Monument-Loop should be kept open even if it requires the FS and users to work out an agreement for land owners.	

23	By decreasing the number of acres that the snowmobiles can use, you will cause increased use in those areas, creating an impact on the safety factor. Decreasing the number of acres we can use could have an avalanche effect that will cause more problems and create more reasons to close more areas.
408	Snowmobile route J through the private land as well. Folks coming through the private land on their ATV's are following the snowmobile J route because it is so well marked and some folks think that the snowmobile route is also an ATV route.
633	I also believe that closing trails and large areas to snowmobiling tends to create problems due to concentrating more and more snowmobiles into smaller congested areas. At present the majority of snowmobile use in north central Montana is already congested concentrated in the DEIS area and closure would tend to be detrimental to all.
<b>Summarized Comment:</b> Commentators generally felt that any loss of system snowmobile trails or riding areas will further erode the opportunities for this activity to occur, and that reducing the total area currently open to snowmobiles may concentrate the use and lead to overcrowding and safety concerns. One comment was that the forest should not close any part of the forest to motorized use in the winter until the EIS analysis is complete.	
<b>Response:</b> The DEIS winter travel plan does not formally designate areas as “play areas” although it is recognized that snowmobiles seek opportunities to utilize meadows and other open areas for snowmobiling. Any play areas shown on past visitors maps are being deleted in future maps. The DEIS on page 114 states that: “None of the winter alternatives reduce existing groomed snowmobile trail mileages.” Alternative 3 adds about 20 miles of additional groomed trails to the existing system. The DEIS on page 113 Table III-30 displays Snowmobiling acres available by Mountain Range and each alternative. There are a wide variety of motorized and non-motorized winter recreation opportunities represented. The Winter Resolution for the Little Belts was agreed upon between the Forest Service and several motorized and non-motorized groups more than one year ago. An agreement was made (the Winter Resolution) between the Forest Service and the groups to close some areas to motorized use in the winter in the Little Belts. This is an existing action that continues to this day. The selected alternative for the travel plan could change this, depending on the alternative selected.	

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1101- (Snowmobiling) opportunities for activity or detriment caused by activity
<b>Letter #:</b> 375	I strongly disagree with closing the area between Monarch, Hoover Creek, and Hwy 89 (along Sun Mountain). Please don't shut off my children's sledding area in T15N, R8E, Section 30 just north of the Neimark Addition
<b>Response:</b> In all winter action alternatives 2 and 3 this area is open for sledding by non motorized means. In the no action alternative (existing situation) this area would remain open to motorized use.	

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1101 - (Snowmobiling) opportunities for activity or detriment caused by activity
<b>Letter #:</b> 109	The snowmobile trail system in the Little Belts offer many "loops". Taking away portions or all of these "loops" would take away the ability to begin a ride and continue on the trail to the parking area without having to double back on the trail
185	Some of the trails they are trying to close are very necessary to be able to continue to ride the loops that the snowmobile clubs have tried to develop and maintain
<b>Response:</b> In all alternatives there is no loss to the existing groomed snowmobile trail system. Alternative 3 adds approximately 20 miles of groomed trail to the existing system.	

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1102- Motorized opportunity (atv, mc, 4x4)
<b>Letter #:</b> 245	Snow Creek trail 419 needs to stay open until Oct. 15. This trail keeps loops open during the fall which is good for lowering trail traffic. Easements across private land in the Middle Fork of the Judith would be great, but being able to build trails around the private property would be better.
Please consider creating an open area in sections 14, 22, 23 which has many mining roads which create an excellent opportunity for travel and exploring. I also recommend that trail 342	

	(tenderfoot) be open to motorized vehicles from trail 344 (Taylor Hills) to 342 (Lost Stove) and the lost stove trail be open to motorized vehicle travel. Please evaluate the proposed trails in alternative #3 in the O'Brian Creek drainage, taking into consideration that a collaborative group would adopt, secure funding for bridges and maintain the trail for multiple users. The Double Gulch Trail 354 should remain open do to the fact that the private property that the trail covers is owned by the Bair Co. and they have not asked that the trail be closed.
348	<p>Ballsinger Creek Trail #343, from Divide road to the intersection with trail #351 needs to be open to complete the loop. Hoover Creek trails should remain open to motorized vehicles. Pioneer Ridge trail #734 should remain open to motorized vehicles to Hoover Trail #736 and Oti Park Trail #732. Middle Fork, Lost Fork, and the south end of the Little Belts should not be closed September 1. It should close Oct. 1! Pilgrim creek trails 315, 304, 304; Bighorn Trail 336; Tillinghast Trail 322 should remain open to motorized vehicles. Snow Creek trail 419. Acquire easements.</p> <p>It is unacceptable that the plan eliminates motorized travel in the Deep Creek area. This area has numerous loop opportunities that help marginalize overuse. Many of the trail in the Deep Creek area are on side hills and have very few creek crossings as well as a creek bed that is dry in the summer keeping low the impact to native fish. I ride through this area four times a year using different routes including Deep Creek trails numbered 320, 308, 309, 338, 316, 352, 317, 301, 331, 310, and Tenderfoot Trails 354, 342, 342. This is too important of an area to give exclusive travel rights to such a small, small group of users. I have never seen any horses on this trail except the ones I was riding in 40 years of use. I have seen very few horse droppings which confirm lack of use. Seasonal closures in the Deep Creek area are un-needed. The elk populations are doing well and the elk have acclimated to OHV. Seasonal closures in the Deep Creek area will result in lower harvest rates, higher elk populations, and increased damage on private lands.</p>
429	Carpenter Creek area: Consider creating open areas in sec. 14, 22, and 23 which contain many old mining roads. The roads will create an opportunity for travel, exploring as well as challenging riding.
347	Don't allow the road to the beginning of the Lost Stove trail to Tenderfoot Creek. Access to Tenderfoot is difficult and if road to Lost Stove was closed I don't know how we could access the creek for a day trip.
111	Trail 311, I would like a closer of it for motorcycles after Oct 1 <sup>st</sup> . A lot of animals get shot and left, people on motorcycles could not return to get their animals because of weather.
<b><u>Summarized Comment:</u></b> Most of the commentators address specific trails and would like those trails to stay open to motorized use because of historical motorized use. Motorized users favor loop trails and they like fewer or no restrictions on motorized use.	
<b><u>Response:</u></b> Many public respondents stated concerns about specific trails that should be opened to motorized use. Specific trail concerns will be addressed. Reference is made to the DEIS, Travel Plan Management, appendix C, pages 350-351, which defines the criteria why routes are closed. The legend for Alternative 5 shows codes for each road and trail that reflect resource concerns/dates of closure as shown in Appendix C. This map is the best way to understand specific resource concerns.	
<p>Typically one or more alternatives provide the kind of trail requested by the respondents. There is a wide range of Alternatives reflecting the wide range of public desires. Appendix C gives the evaluation criteria that were used to make recommendations, primarily in Alternative 5. Trails or roads with date closures responded to wildlife needs. Trails closed totally to motorized use likely responded to other resource needs described.</p> <p>Many trail closures to motorized use begin on September 1. The reason for this closure date is it begins the big game "bow" season, with most "bow hunter" using atv's throughout the forest. This atv use has tremendously expanded over the last 10 years, displacing big game to private lands where hunting is unavailable to the general public. This is the number one reason why the closure date of September 1 is used for motorized use restriction (Middle Fork, Lost Fork and the south end of the Little Belts).</p>	

Snow Creek trail 419: This trail is shown as a single track trail for motorcycles in several alternatives, including Alts. 1 and 3 keeping it open until 15 October. Alternative 5 restricts it because of elk security concerns 1 Sep-1Dec during bow and rifle season. This is a no change from the current situation.

Tenderfoot Creek trail 342: This trail should be managed as a non-motorized trail. All motorized use should be restricted yearlong (except that portion between Lost Stove and Williams Mountain). The rationale for this management is that this trail has numerous creek crossings and the associated sedimentation into Tenderfoot Creek and the Smith River is accelerated by motorized use. This causes both soil erosion and impacts a sensitive fisheries resource. Both are the issue for this management. Alternatives 1, 3, and 5 would keep much of the trail open to motorized use. Alternative 4 would make the trail non-motorized. Making the trail non-motorized would be a change from the current situation (motorcycles are legal to use trail 342).

Lost Stove trail 346: this short trail would be managed as a single track motorcycle trail open year round in Alts. 1, 3, and 5. There are no restrictions to motorcycles. This is a no change from the current situation. Only Alt. 4 would close it.

Taylor Hills trail 344: this is an old two track (road) and would be managed as a two track motorized trail for atv's and motorcycles in Alts. 3 and 5, but would only be open to motorcycles to Tenderfoot Creek. Atv use would stop at the private land because of steep slopes and soil erosion issues. This is a change from the current situation, where atv's are going to Tenderfoot Creek.

Double Gulch trail 354: This trail is shown as open to motorcycle use in Alternatives 1 and 3, and closed to motorized use year round in the other alternatives.

Ballsinger Creek trail 343 and 351: These trails would be managed as a single track trail open to motorcycles yearlong in Alternatives 1, 3 and 5, although Alternative 5 removes one short section of trail 343 (1.5 miles approximately) before its existing junction with Trail 342, while Alternatives 3 and 4 make that same section non-motorized. Alternative 4 would make both trails non-motorized.

Pioneer Ridge trail 734, 729, 732, U323, U324, 6352 and 733: The existing Alternative 1 has no restrictions on motorcycles on the Hoover Ridge area complex of trails, other than on Trail 729, which is closed to motorized use. A portion of Trail 734 would be managed as a motorized single track (east and west portions) and a portion would be managed as a double track atv trail (the center portion accessed by atv trails 6352 and 733) in Alternatives 3 and 5. Alternative 4 would make non-motorized all or most of these trails. Alternative 5 shows that several portions of the trail system would be managed as a single track and would be unavailable to motorcycles during the rifle season. The restrictions are for big game security and to reduce user conflict (horse vs. atv). The area would be shared with horse hunters. Trails 729, 732, U323 and U324 would be non-motorized in Alternative 4. U323 and U324 are also non-motorized in Alternatives 3 and 5. Trail 729 is closed to motorized use in all alternatives, suggesting resource or conflict problems obvious regardless of alternative maker. Trail 732 on the west is open in all alternatives except 4, but does have big game rifle season restrictions in Alternatives 3 and 5. Oti Park Trail 732 has a variety of motorized restrictions and closures depending on the Alternative selected. Only a small portion of this trail would be managed as a single track motorized trail prior to September 1. The majority of this trail is closed to motorized use because of numerous creek crossings (lower portion) and for big game security (North Fork Hoover Creek and Oti Park). As with other trails, this complex has concerns with big game security and motorized use during big game hunting season.

Pilgrim Creek trails 315/304: these trails will remain open to single track motorized use year long in Alternatives 1 and 3, but would be closed in Alternatives 4 and 5. Opportunities to provide some motorized use will be looked at.

Bighorn trail 336/322: these trails are closed to all motorized use yearlong in Alts. 4 and 5 to protect the character of the roadless area and to provide hiker/horse users “quiet” areas. In Alts. 1 and 3, Trail 336 remains open to motorized use yearlong, while in Alt. 2, Trail 322 is seasonally closed during rifle Big Game Season.

Trail 320/316/317/338: These motorized trails are open yearlong to motorcycles and atv use (Trail 338 allows ATV use) the yearlong in Alts. 1 and 3. Alt. 4 closes them all to motorized use. Alt. 5 allows motorcycle use seasonally, and no ATV use on these trails. Seasonal restrictions are for wildlife protection and keeping the area non-motorized during rifle season.

Trails 301/308/309/310/331: These trails are open in Alternatives 1 and 3 to motorized use, and some are open to ATV use. None have seasonal closures. Alternative 4 closes them yearlong to any motorized use. Alternative 5 limits motorized trail access to just one ATV trail, which is closed after big game season to protect winter range. See Alternative maps for specifics. These other trails are closed to motorized use yearlong in Alternatives 4 and 5 to maintain the remote character of the Smith River corridor and the roadless area. It also would provide “quiet” areas for hikers and horse users. See the “Smith River Corridor Recreation “ issue on p. 115 of the DEIS for more information on the desired character of the river corridor.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102 atv, mc, 4x4 opportunities</b>
<b>Letter #:</b> 375	Most of the trails proposed for trail bike closures aren't that environmentally sensitive and would soon disappear if not for trail bike use. For example, keep open TR 306, 307, and the north halves of TR 343 and 320. Who's going to maintain these trails if the trail bikers don't.  I ride my bicycle on FS trails frequently. Bicycle riders do want trail bikes to use the same trail we use. Without trail bike use, many of these trails would disappear from lack of maintenance. Don't restrict trail bikes without significant environmental justification.	
623	Personally I never had any confrontations with any users until the travel plan was proposed. It appears to me that hikers have total access (cross country travel) to the NF whether on a trail or not. Motorized users do not and are currently restricted to FS recognized trails.	
137	The Little Belts have many roads and trails but not many areas for horse or hiking. I would like to see more areas for this purpose.	
D-32	Complain of having only a small portion of the Little Belts mountains available for hiking. I am not sure, but I believe that there are no restrictions on hiking in the Little Belts and that it is 100% available to hikers.	
342	They should be allow to take certified hay only. This should be certified hay only. I have been checking the hay the outfitters take into Hoover Creek and they do not use certified hay nor does anybody else because it is not required. Why are horse people allow to go anywhere? Horses cause more destruction to trails.	
<b>Summarized Comment:</b> Commentator states that trails used by motor bikes use keeps trails open for bicycle use. Hikers and horse users can use every acre of National Forest, but motorized users are restricted to the trail system. One says that most motorcycle trails are not environmentally sensitive. Another concerned about lack of areas for horses and hiking. We assume this means areas that are not motorized. Certified hay is not required in the Hoover Creek area.		
<b>Response:</b> We agree that motorcycle use can keep a trail open to bicycle use, especially if a trail otherwise has little or no use and low maintenance levels. The Forest Service/BLM Three State OHV Decision, 2001 is described on p. 9 and describes why motorized recreations are required to stay on existing roads and trails. The DEIS, Travel Plan Management, Purpose and Need for Action, page iii describes the purpose of travel management is to provide the public with opportunities to use both motorized and non-motorized means of transport to access public lands, and that the analysis will analyze the impacts of these activities. P. iv, Travel Management Objectives for Project Area, further describes the objectives of the Travel Plan, including meeting the needs of the commenters for motorized and non-motorized use within the bounds of resource protection, public safety, and control of conflicts between users. We have developed an array of alternatives, with the help of the public, that provide a wide range of transportation options. “Opportunities for a Full Spectrum of Summer Recreational Activities and Settings” starting on p.		

50 of the DEIS addresses this recreation issue. The environmental sensitivity of trails can best be determined by the reader by looking at the Alternative 5 map road and trail codes, and comparing them with Appendix C, p. 350 travel management evaluation criteria. Appendix C, page 351, states that certified weed seed free hay is required by special order across the Forest. Please contact Forest Service law enforcement officers if you know of specific violations of this order.

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1102, atv, mc, 4x4 opportunities
<b>Letter #:</b> 406	The more I see encroachment upon wild places by noisy and obnoxious ATV's and motor bikes. This encroachment degrades the outdoor experience for those trying to enjoy the visual beauty of the mountains, as well as the peace and quiet. The adverse effects on wildlife, plants, and fragile soils by motorized recreation are even more pronounced. Motorized abuses are growing, as well as the arrogance associated with the perceived "right" to take the off-road machines wherever they want. There are just too many miles of existing back roads and snowmobile trails to buy the argument that motor enthusiasts are being deprived of their form of recreation.
446	While the current travel planning process is intended to correct the deficiencies of the past, the presence of ATV trails and the increase in use of all vehicle types has the practical effect of making it politically more difficult to determine fairly an appropriate place for ATV's and other off-road vehicle use. It is imperative that the FS makes clear to off-road vehicle users that they have no historic rights to trails on national forests because of unauthorized or illegal activities of the past.
282	Recreational off-road vehicle use, including recreational backcountry airstrips is a recent phenomenon. ATV use was not even included in a travel plan until 1988, and the modern dirt bikes of today, are far different than the dirt bike sold in the 1970s. If airstrips exist in these areas, it is unlikely they were ever authorized for recreational use. We are not aware of any information from the industry suggesting the sales are likely to decrease. Off-road vehicle use does not seem to be tapering off. By all accounts, off-road vehicle use has been increasing nationally, and in other national forest in Montana. The analysis should also recognize the technological change and marketing which have occurred in recreational motorized vehicles. An October 6, 2005 Great Falls Tribune photo showed an ATV which is even wider than the 50 inches legally allowed on trails. The marketing of new vehicle types should not be determining use on public wildlands. Allowing off-road vehicles to establish playgrounds within the more remote areas displaces traditional users, diminishes historic wilderness characteristics, and affects the potential for their inclusion in the wilderness system. This trend is unmistakable: no wild place can resist motorization without formal protection. The time to curb off-road vehicles use is now, not sometime in the future, when ORV use becomes better established, travel restrictions become politically more difficult to implement, and these mountain ranges becomes an even more different and degraded place than they are today. Non-Motorized activities are also increasing.

**Summarized Comment:** Adverse effects caused by ATV's and motorcycles. It is believed that many ATV users have a perceived "right" to use machines wherever they want.

**Response:** There are certain instances where motorized use has established itself through historical use. The 1988 Travel Plan allowed the majority of trails in the analysis area to be open to both motorized and non-motorized use. The motorized community has often contributed to the maintenance of these trails, developing a form of unofficial "ownership" and stewardship on these trails.

Motorized trail use is a legitimate form of recreation where it does not produce unacceptable resource impacts, public safety issues, or public conflicts. There are no historic rights for continued motorized use on specific public trails. There is clear legal direction, however, that the agency provide a mix of recreation use opportunities, including motorized use.

The illegal establishment of trails by motorcyclists and ATV users is addressed in this analysis. While this is part of the history of motorized use on the forest, this was not a legitimate historic use. These user-made trails were identified (located and mapped) where possible, and are required to be included in Alternative 1. Only some are adopted as part of the Forest's developed trail and road system in the action alternatives. Analysis of these user-created and other non-system trails is required in this travel plan analysis. See "Purpose and Need for Action" on pp. 3-5 for further discussion of these user-created trails and roads.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102, atv, mc, 4x4 opportunities</b>
<b>Letter #:</b> 527	4-wheeler does less damage than horses or mules do. They seem to dig further into the ground, then they make the trail wider to go around what they dig up.	
410	Tenderfoot Deep Creek Travel Plan. I imagine the following to be threats to this area if ORVs are given access: Wildlife disruption, trail erosion, soil erosion, pollution, track invasive plants, sound pollution.	
495	I am especially concerned about vehicle use in the Tenderfoot Deep Creek/Smith River corridor.	
565	Just this year we witnessed what vehicle damage can do to a hillside, when a few motorized vehicles trespassed on land now owned by the LC Interpretive Center Foundation (though at time, the property was owned by the Wilhelm family). Since purchasing the property, the foundation has had to go back and repair compacted soil, ruts, and vegetation loss, from what some may view as a harmless and fun hobby. Unfortunately, all it took was one wet weekend and a few vehicles tearing up the hillside to cause damage. The small problem the foundation experienced could very well be magnified many mre times in hundreds of miles of unsupervised areas in the forest.	
638	I have observed more ATV damage in recent years and believe this is because there are more ATVs and there is very little one can legally do with them except go up and down the roads. More opportunity and more enforcement is needed.	
<b>Summarized Comment:</b> There is considerable concern about damage by motorized use, although letter 527 says ATV's do less impact than stock.		
<b>Response:</b> Motorized impacts are discussed in the water and soils issue analysis on pp. 166 and 196. The 3 state OHV Agreement between the BLM and Forest Service recognized the issue of damage created by off-trail use by motorized users, causing the agencies to ban it. This is discussed on pp. 9-10. There is a wide range of alternatives in the Tenderfoot Deep Creek/Smith River corridor regarding motorized use there.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102 - atv, mc, 4x4 opportunities</b>
<b>Letter #:</b> D-69	My parents live in the heart of this travel plan in Neihart, MT. As I have already stated they are elderly and the only way that they can enjoy the outdoors is with motorized sports. They also are able to ride from their back door into the FS to enjoy themselves. The entire Kings Hill area is accessible to them the way things are. I spend as much time as I possibly can at their home with them, summer as well as winter, getting them into the outdoors. I feel it would be a shame to close them out due to the opinion of a few. Most of the population of Neihart is elderly and most of the residents there are motorized enthusiasts.	
619	As senior citizens we are approaching to having more opportunities and time to enjoy Montana's great forests. We would like to have roads made legal for OHV use so riders can connect trail loops and access camp sites. Wherever possible make loop trails connect to each other to farm a system of trails. Our organization, Russel Country Trail Riders, has volunteered time on projects to maintain trail systems and will continue to.	
333	A better alternative would actually be to expand the trail system by creating more loops. This would spread out recreational users, minimize dual traffic, and cause less haressment to wildlife.	
<b>Summarized Comment:</b> A growing segment of the population are becoming elderly and have the time and money to become motorized enthusiasts. They don't want to see these opportunities reduced. Make loop systems for motorized users wherever possible.		
<b>Response:</b> The DEIS, Travel Planning Management, Future Trends, pages 102-107, references trends of an aging population, as well as trends by recreation activity. Alternative 5 created motorized loops where possible. Mixed traffic, wherein non-street legal OHV's and passenger and high clearance authomobiles and trucks can mix on the same road, is proposed in Alternatives 3 through 5. See Table III-5 on p. 59 of the draft EIS. Restrictions proposed in Alternatives 3, 4, and 5 address in different ways and intensity concerns with motorized use and social conflict and resource impacts. A reader can look at Alternative 5 map and the Appendix C on p. 350 to better understand some of the conflicts, especially where trails and roads are closed seasonally. PP. iv-v describe travel plan objectives and goals affecting the various recreation activities, including motorized use, and why we may close to motorized use some trails and roads.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102</b>
<b>Letter #:</b> 399	I feel that the use of many of the trails in these areas is regulated very well simply by the weather. Snowfall in the late fall usually prohibits wheeled traffic in many areas.  I also feel that the seasonal restrictions leave the trails open for too short a period of time. On dry years use could be restricted where use is just 4-6 weeks.	
<b>Summarized Comment:</b> Let the weather close off motorized trails rather than having seasonal restrictions that keep trails open too short a period of time.		
<b>Response:</b> Short seasons may result in some areas, based on protection of existing resource needs. Appendix C on pp. 350 and 351 describe some of the resource reasons trails have seasonal closures. Specific trail seasonal restrictions can be best understood comparing this appendix with the Road and Trail Code Legend on Alternative 5.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102 - atv, mc, 4x4 opportunities</b>
<b>Letter #:</b> 416	Concentration of motorized trail users will result in conflict where there was no conflict previously.	
522	There are already large blocks of non-motorized summer areas in the Rocky Mountain Front, Highwoods Mountains, Crazy Mountains, and Snowy Mountains. The Little Belts should continue to serve as the premier motorized area, both summer and winter.	
146	If it is closed you will push the present users to ride in other areas that are more vulnerable to damage this early in the season.	
176	More closures will concentrate use in other areas.	
190	I believe the non-motorized people have many options to enjoy the trails that the motorized people don't. The Bob Marshall, Beartooth, 70% of the trails in the Highwoods. The motorized people can't enjoy. These areas The Little Belt Mountains and 30% of the Highwoods area the only options in this area.	
383	It has been obvious to me that the Little Belts have had an increase in motorized use over the years and to reduce the areas with in them for motorized use will cause a lot of congestion which could lead to accidents and increased USFS liability/enforcement costs.	
429	Recent proposed travel plans (of) other forests will greatly reduce future motorized travel if they are put in place in there current form. While the number of motorized users is increasing at a fast pace, the areas available for motorized recreation are decreasing. This in turn has brought about an increase in numbers of users in areas having motorized opportunities. With the closures on other forests in Montana the motorized user has had to travel some distance in order to find opportunities to enjoy motorized uses. The Little Belts, Castles, Crazies, are being use(d) by folks from the Hi-line to Bozeman, Billings to Helena, Great Falls and all points in between due to lost opportunities created by closures to motorized uses.	
522	While OHV use has increased, OHV riding opportunities have decreased due to closures and restrictions in the Helena, Gallatin, and Beaverhead-Deerlodge National Forests. The cumulative affect of closures on other forests are not being adequately or accurately considered in any of the alternatives.	
556	Cumulative closures and restrictions on other forests have not been considered in this proposal.	
578, 577	Many past actions have greatly diminished the recreational experience and opportunities of the motorized user. I request that your forest evaluate the past actions in your forest district and other districts that have affected motorized users and ascertain an overall picture of what impact these past actions have had.	
638	I am concerned that if motorized recreation is confined to a smaller area there will be potential for more environmental damage. I have already observed more motorcyclists from surrounding areas (Bozeman, Helena, Butte, etc.) in Monarch/Neihart area because of fewer riding opportunities in their forests due to revised travel plans.	
645	In the interest of balance, the amount of roads and trails closed to motorized use in surrounding areas such as the Rocky Mountain Front and portions of the Highwoods's, Snowies, Castles, and Crazys should be given serious consideration in all travel alternatives for the Little Belts.	
678	Yes OHV vehicles use had (has) increased, but also has the areas to be able to ride have decreased in the Helena, Gallatin, and Beaverhead-Deerlodge Areas. The cumulative closures of all these areas has not been considered in this proposal.	

**Summarized Comment:** Many believe that the non-motorized public have ample opportunities in the Rocky Mountain Front, the Highwoods, and elsewhere on the forest, and that reducing available motorized opportunities in the Little Belts will concentrate impacts, increase conflicts, and cause safety issues. Past exclusion of motorized use on other forests and on this forest will cause motorized use to concentrate in the Little Belts. Some think we did not look at the cumulative effects of these past actions on the motorized user and availability of trails for them.

**Response:** The DEIS, Travel Planning Management, Future Trends, pages 102-107 discusses future recreation growth projections for a variety of activities, including motorized use. It also describes a Desired Future Condition(DFC) on pp. 106-107 regarding conflicts and crowding. This DFC is used in comparing alternatives in terms of physical capacity and crowding and potential for conflict between users. Alternative comparisons are found on pp. 108-111. The opportunities for a full spectrum of summer recreation activities and settings are described by alternative on pp. 50-74, and include discussion by alternative of the forest policy to provide a wide variety of recreation opportunity spectrum settings to accommodate a wide variety of recreation activities. Concerns expressed above about cumulative effects of past reductions of motorized use on other forests are discussed on pp. 84-92 under the issue “Cumulative Effects of Past Closures on Opportunities for Motorized Recreation.”

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1102 - atv, mc, 4x4 opportunities
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<b>Letter #:</b> D-32	I wonder where the “Exclusive-Use” area is for motorized people. Maybe the Forest Service should study that concept. Yeah, an area where the users that can actually use the acreage provided, can play.
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**Summarized Comment:** We assume you feel that non-motorized areas are “exclusive” use, and why don’t we have “exclusive” use areas for motorized users.

**Response:** Non-motorized areas are typically open to every use except those with combustion engines. This includes most recreation activities—hardly an exclusionary restriction. The non-motorized uses are allowed because they reduce or eliminate conflicts between motorized and non-motorized users, and/or because they do not unduly impact other resource values. Forest Service policy is well described on pp. 50-55 and pp. 61-74. There is no Forest Service policy to create “exclusion” areas where only one kind of recreation activity is permitted. Motorized trails are always open to non-motorized kinds of use. Even forest roads are not closed to non-motorized use on the shoulders of edges of the roads. Exclusive areas for motorized users falls in the potential domain of private property owners seeking to encourage only specific kinds of use.

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1102 - atv, mc, 4x4 opportunities
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<b>Letter #:</b> 631	What I saw proposed for the Castle Mountains was pretty acceptable, especially if the trail from the top of Elk-Peak south to Castle Lake is kept open. This is the only legal access to the lake for the general public and would be too far to hike. There is great fishing in Castle Lake and the trail that is there now needs one short steep section rerouted and the rest is a great trail for snowmobiles, motorcycles and ATV’s.
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There should also be a couple ATV loops in the Crazy Mountains. There should be one starting on the Forest Lake road just north of the Forest lake cabin on trail 642 to Mt. Elmo continuing west until it meets up with trail 645 and on into the road in the West Fork of Cottonwood Creek. There is one short section of this ¼ to ½ mile that could use minor improvements and it would be a great trail loop for motorized use with greatviews from the top. The other would be trail 641 Castle Creek trail also just north of the Forest lake guard station and continuing around to the upper end of the main Forest Lake road this one would require a little more work in the bottom of Castle Creek but after it exits the creek bottom would be a pretty good loop route.

**Summarized Comment:** Commentator wants motorized loop routes in the Castles-Elk Peak and Crazy-Forest Lake areas.

**Response:** The Forest Lake road is being proposed as part of a large ATV route with the Gallatin, including trail 645, the Honey Run trail and a newly constructed trail into Lodgepole Creek creating a 40 mile ATV route for summer use. Alternative 5 reflects that part of the loop on the Lewis and Clark N.F. side. You would need to see the selected Gallatin portion on their final EIS decision

map. As a compromise with hikers and horse users and for big game security the route would be closed after 9/15 to motorized use. Trail 641 and 642, although shown as ATV trails in Alt. 3, would not make good motorized loops because of the rough terrain and expense in constructing and maintaining such a trail. The area is more suited for non-motorized use.

The trail from Elk Peak to the lake is not a system trail, and is not recommended for use in Alternative 5 because of its steep grade and possible safety concerns. The final selected alternative, however, may consider keeping this trail. If it does, the agency would need to deal with the steep trail sections and possible safety concerns on those sections of the trail to the lake. Alt. 5 also has the roads from the south closed to motorized use. A motorized undetermined route does appear in both Alternatives 1 and 2 to the lake from Elk Peak, but this segment of trail is non-motorized in Alternative 4.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102</b>
<b>Letter #:</b> 282	<p>Recreational off-road vehicle use, including recreational backcountry airstrips is a recent phenomenon. ATV use was not even included in a travel plan until 1988, and the modern dirt bikes of today, are far different than the dirt bike sold in the 1970s. If airstrips exist in these areas, it is unlikely they were ever authorized for recreational use. We are not aware of any information from the industry suggesting the sales are likely to decrease. Off-road vehicle use does not seem to be tapering off. By all accounts, off-road vehicle use has been increasing nationally, and in other national forest in Montana. The analysis should also recognize the technological change and marketing which have occurred in recreational motorized vehicles. An October 6, 2005 Great Falls Tribune photo showed an ATV which is even wider than the 50 inches legally allowed on trails. The marketing of new vehicle types should not be determining use on public wildlands. Allowing off-road vehicles to establish playgrounds within the more remote areas displaces traditional users, diminishes historic wilderness characteristics, and affects the potential for their inclusion in the wilderness system. This trend is unmistakable: no wild place can resist motorization without formal protection. The time to curb off-road vehicles use is now, not sometime in the future, when ORV use becomes better established, travel restrictions become politically more difficult to implement, and these mountain ranges becomes an even more different and degraded place than they are today. Non-Motorized activities are also increasing.</p>	
<p><b>Summarized Comment:</b> Concerns that Forest Service is being pushed to accommodate ever wider ATV's on trails; that ATV's didn't exist prior to late 80's and are a new phenomenon that is ever growing in numbers; that OHV's not be allowed to establish playgrounds off of trails and roads; the need to have formal protection of wildlands from OHVs before it is politically too late.</p>		
<p><b>Response:</b> The Forest has no intent on allowing OHV's wider than 50" to be used on existing narrower trails. However, there are opportunities to use the existing road system via mixed use, as is proposed in all of the action alternatives. See Table III-2. This is an administrative decision, and does not require NEPA. There is also the likelihood that some of these roads will be converted into a 4x4 trail classification in the selected alternative, allowing motorized OHV and road vehicle use on high clearance roads that are converted to trails. This make sense in that it uses existing road facilities to accommodate this growing area of recreation. It also converts some old, low maintenance, high clearance roads that have adequate widths for wider OHV's and 4x4 vehicles, including pickups and SUV's, into trails. Regarding playgrounds, it is possible that some small areas could be established as "playgrounds" for OHV's or 4x4 vehicles, but only where such areas are not erodable or where resource damage could occur. Such an area might include a boulder field adjacent a 4x4 trail or OHV trail. No specific locations have been agreed upon. Regarding formal protection of wildlands, travel planning is the mechanism we use to determine where motorized use is acceptable. It has the power of law and is enforceable. We recognize that OHV numbers are growing, but we are placing resource protection needs first, and accommodating motorized use where it's resource impacts are minimized.</p>		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1102 - atv, mc, 4x4 opportunity</b>
<b>Letter #:</b> 638	I believe we need to expand the areas for beginning riders and ATV's by opening up developing routes through the old logging areas (i.e. Long Coulee, Sprague Gulch, Big Timber Gulch) so they have areas to ride to get them off the roads.	
<b>Response:</b> This comment refers to old roads once used for logging. The final selected alternative will consider your suggestions in these drainages.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1103 - Hiking trail comments</b>
<b>Letter #:</b> 431	From 1977 until at least the middle 1980's the trails in the Little Belts and Highwoods were faint, little used, and hard to follow, but they were pleasant and quiet, and fish and game were plentiful. Some trails that are now heavily used existed only on maps.	
<b>Summarized Comment:</b> Overcrowding by motorized users. Seasonal restrictions not needed.		
<b>Response:</b> Trends and use figures are described in the Recreation issues on pp. Reference is made to the DEIS, wildlife section pp. 220-253. See pp. 222 for rationale of management indicator species, and concerns for displacement of these populations by recreation travel and potential for increased hunting pressure. Many seasonal restrictions are needed to maintain and prevent displacement of wildlife/game herds. See also Appendix C on p.350.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1104</b>
<b>Letter #:</b> 125	I would like to put in a request that the forest service consider adding a snowshoe trail system to this area	
<b>Response:</b> All trails and areas are open to snowshoeing. Although no specific packed/groomed snowshoe trails were discussed in the DEIS, opportunities are also available throughout the forest on non groomed back country ski trails. This travel plan does not forgo opportunities for such a trail system in the future, nor the opportunity to snowshoe currently on existing non-motorized trails not presently groomed for cross country skiing use.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1104</b>
<b>Letter #:</b> 264	Also there should be no snowmobiling allowed on the Forest prior to December 1. This is to reduce conflicts between hunters and snowmobiles. An exception could be on routes designated for year around use by motorized vehicles or routes designated for mixed traffic if snow depths are of such that pickups, four wheelers etc. cannot use the route.	
264	As stated in October 20, 2005 comments. page 6) a snow depth requirement is needed for snowmobile usage on the forest. That depth should be the 4" to 6" range to protect soils, watershed values and tree plantations	
<b>Response:</b> Presently Alt. 1 allows snowmobiling in some areas of the forest prior to December 1, and states that actual dates of area restrictions may vary depending on when snowstorms occur or when roads harden for wheeled use. Alternative 2 does not show specific dates for snowmobiles on the alternative map, and leaves the most of the Castle and less than half of the Crazy Mountains open to unrestricted snowmobile use. Alternative 3 restricts snowmobile use on groomed trails, allowing it only from 15 Dec to 15 April. Alternative 3 allows snowmobile use on certain roads, and these are only between 15Dec and 15 April. The forest is looking at not allowing cross-country snowmobiling until 1 December, but is not looking at minimum snow depth requirements, which can vary from day to day and location to location so much as to become unenforceable.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1104</b>
<b>Letter #:</b>	In overturning this decision, the Region-1 Appeal Reviewing Officer wrote: 1) Issue 3) whether the Travel Plan complies with Executive Orders 11644 and 11989 and 36 CFR 295? You contend that the Travel Plan does not comply with the planning requirements of 36 CFR 295.2 (a) and (b). An EA was completed for the Travel Plan revision. As you point out, however, analysis and evaluation of impacts to soils, water .. And other resources is required by the regulation. The EA prepared by the Forest does not clearly display an analysis of impacts from specific vehicle types. [ . . . ] this will necessitate a new analysis and decision on travel planning	

on the Forest. The new decision is to be made in full compliance with NEP A, EO 11644, EO 11989, and 36 CFR 295. Only now, almost 18 years later is the travel plan being revised. In the mean time, vehicle use of an types has become better established and new types of vehicles and new trails (most illegal) have been created without an analysis or public process. Under the current 1988 plan there are almost 1,200 miles of bladed roads, 436 miles of "high clearance roads" and over 500 miles of trails open to some type of off-road vehicle use in the Little Belt Mountains. By contrast, only 62 miles are designated as quiet trails.

**Response:** P. 21 summarizes past concerns you've stated about the "illegality" of the 1988 Travel Plan, and why it should not be used as the basis for a proposed action. Your concerns about erosion and protection of other resources is one of the seven evaluation criteria established on p. iii to provide long term protection of resources and for the recreational enjoyment of the area. P. iv under "Travel Management Objectives for Project Area" describes the need to provide OHV recreation opportunities that are in concert with the environmental setting and minimize effects on the land and resources. PP. 3-4 discuss non-system roads and trails and how they are addressed in the analysis. Page 4 describes how since January, 2001 the Forest Service and BLM have prohibited cross-country motorized travel in Montana in order to reduce impacts from motorized vehicles leaving trails and roads. Page 5 describes the consensus reached for the 1988 Travel Plan by most of the public, and the appeal by four groups not in agreement. The 1988 Travel Plan was not remanded as a result of the appeal, and has served the public since that time. Appendix D describes mitigation measures that are common to all alternatives, including Best Management Practices for soil and water and noxious weed prevention. Appendix G describes Best Management Practices applicable to all alternatives and which protect water resources. Your concerns about quiet trails, vehicle use and new trail development are documented on pp. 50-75 for the issue "Opportunities for a full spectrum of summer recreational activities and setting." Table III-8 describes by alternative the miles of undetermined roads and trails becoming system trails or roads by alternative. Note that the large majority of undetermined roads are not adopted as system roads in Alternatives 3 through 5. The majority of undetermined trails are adopted only in Alternatives 1 and 3, but not in Alternatives 4 and 5. Future trends for existing and potential new kinds of uses are analyzed in "Current and potential use levels by activity" on pp. 95-111. On p. 107 under "Desired future conditions" it states the forest desire to not allow new transportation technologies on the forest until assessments of their potential impacts on resources are made and a decision made on their acceptability or not on the Forest. Page v references laws, policy, and regulation guiding this analysis. On pp. 166-180 soil erosion is discussed, as well as effects of various kinds of trail uses. The Water Quality issue describes effects of various types of trail users and vehicles on page 201. Executive Order 11644 requirements will be met with the selected alternative. They include designation of the specific areas and trails on public lands on which the use of off-road vehicles may be permitted, and areas in which the use of off-road vehicles may not be permitted. The selected alternative also directs that the designation of such areas and trails will be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands. The selected alternative also includes the designation of such areas and trails shall be in accordance with the following--

- (1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.
- (2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.
- (3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

The selected alternative responds to EO 11989 by closing to off-highway vehicle use those areas where such vehicles will cause or are causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1104 – Opportunities for or detriment from skiing, snowshoeing and dog sledding</b>
<b>Letter #:</b> 103	I would like to make sure that dog Musher’s are included in this trail proposal. We musher’s run the trail out of the King’s Hill Parking lot through Lone Tree, Onion, William’s etc.	
467	However I would like to see the areas along side the cross country ski trails protected from snowmobile use to some degree.	
17	We support the continued year long closure of the Silver Crest Cross Country Ski Area and urge the FS to extend that year long closure to include the additional loops added since that yearlong closure which was included in the 1988 Travel Plan. This yearlong closure protects Silver Crest from woodcutters, hunters, etc driving vehicles on the trails in rainy, muddy weather that causes deep ruts and uneven terrain making ski trail grooming difficult, particularly in the early part of the ski season	
23	We have very little problem with the areas set aside for the cross country skiers, but we feel some of the boundaries should be relocated to make it easier to recognize, such as natural boundaries like park edges, ridges and drainages. This would also make it easier for law enforcement and snowmobilers to tell where the boundaries have been established.	
<b>Summarized Comment:</b> A dog sledder sought consideration of their sport for winter trails. A cross country skier sought further protection of the new added cross country ski loops at Silver Crest Ski Cross Country Ski Area as was granted the original trails in the 1988 travel plan decision. There is a certain amount of conflict between crosscountry skiers and snowmobilers that can be solved if snowmobile exclusion areas are easily defined by topography and natural delineators such as park edges.		
<b>Response:</b> #103- The Travel Plan DEIS did not address or propose a reduction to or exclusion for dog mushing on any existing authorized groomed snow routes or trails with the exception of the Silver Crest Cross country ski trail system and Showdown Ski Area.		
#467- The DEIS on page viii describes the direction for Winter alternatives 2 and 3 which provides for non motorized areas surrounding the 4 identified cross country ski trail systems in the Jefferson Zone, (Mizpah, Deadman, Jefferson Creek and O’Brien Creek Cross Country Ski Trail System)		
#17- All winter and summer alternatives keep the Silver Crest Cross Country ski area as non-motorized.		
#23- During the winter resolution many adjustments were made to design the boundaries of the snow mobile closure areas around natural features. Winter Alternative 2 depicts this agreement between the Montana Snowmobile Association, Montana Wilderness Association and other organizations for management of the winter agreement in the Little Belt Mountains.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1106 - cumulative effects</b>
<b>Letter #:</b> 360	Under “cumulative effects”, the Missouri Breaks is mentioned again. The UMRBNM is not germane or relevant to the Jefferson Division Travel Plan except that both involve federal land management agency processes, processes that are very different and subject to an entirely different set of criteria.	
383	The entire LCNF needs to be addressed when talking of so called Quiet areas of pristine experience. Restricting motorized use in the Little Belts/Castle/Crazys will not make those areas even begin to compare with the RMF & areas west of it for a “Pristine experience”.	
556	In formulating the new travel plans for this forest the FS must look at past actions that have affected communities and forest users. Many past actions have greatly diminished the recreational experience and opportunities of the motorized user.	
<b>Summarized Comment:</b> The Missouri River travel management is irrelevant. The Jefferson Division does not compare to the Rocky Mountain Front in regards to pristine qualities. Cumulative effects.		
<b>Response:</b> The Missouri River Breaks area is mentioned as one successful example of a travel management plan by a federal agency. The airfields issue on p. 76 also mentions the Missouri River Breaks Monument because it’s airfield help describe the existing situation for airfields. Cumulative		

effects of past travel planning in the region is contained in the DEIS, page 84-92, and includes discussion of all parts of the Lewis and Clark N.F. as well as other eastside National Forests. P. 90 discusses the relationship between likely recreation emphasis on the Front being non-motorized use, and the possibility of the Jefferson Division having a motorized use emphasis. Since neither final decision has been made, this can not be definitely stated, but only stated in terms of likeliness to happen.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1107 – Effects to scenery or visual resource</b>
<b>Letter #:</b> 221	Being from Neihart I know a lot of people who enjoy recreational driving for sight seeing and the ability to get into the interior of the forest to do this. Many of them including a lot of elderly can only do this from their car or pickup. They do not want to stick to the main roads they enjoy getting away.	
635	The corridor highway;89 is a scenic corridor and trail damage from ORV use will be seen from the highway	
8	Visual and other impacts associated with motorized trails have been cited as significant negative impacts. Many non-motorized trails have environmental impacts similar to motorized trails. We request that the existence of trails be considered part of the natural landscapes and that the visual appearance of motorized trails and non-motorized trails be recognized as equal in most cases and that the environmental impacts of motorized and non-motorized trails be addressed fairly and equally.	
<b>Summarized Comment:</b> The 3 above comments speak to potential effects to sightseeing and visual resources.		
<b>Response:</b> Regarding driving by elderly, Table II-2 on p. 56 shows that action alternatives 3 through 5 each offer approximately the same amount of road driving opportunities. The No Action alternative includes undetermined roads, most of which were not desirable to keep as part of the developed road system. Highway 89 is a scenic corridor. It is not anticipated that trail proposals will have any sizeable or significant effect on views from that highway, largely because of their small size and available timber screening in many parts. Regarding visual impacts of trails from various uses to trail users, trail damage, whether done by motorized or non-motorized means, can be equally visually impacting. Trails, in past scenery analysis work by the forest landscape architect, have only occasionally been viewed negatively as scenery impacts, where they may dominate views by users of the trail when they are deeply rutted, or braided, or cross across meadows rather than using the edges of meadows for their locations. Trails are essential for recreation and can be considered a part of the natural landscape, but can also be visually impactful when overused, or misused, or mislocated, regardless of the kind of user. Both stock and motorized users can have negative visual impacts on trails.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1108 – Opportunities for disabled access or detriment caused by disabled access</b>
<b>Letter #:</b> 8	Many handicapped, elderly, or physically impaired citizens can only access and recreate on public lands by using motorized roads and trails. The needs of these citizens should be adequately considered	
319	Now that I'm disabled I use my ATV and 4x4 truck to get to places witch you want to shut down. I feel you are punishing the disabled and senior citizens.	
635	Outspoken disabled forest users seem to think that they deserve to drive machines anywhere they want and that the law requires the F .S. to give them that privilege. That belief is neither supported by the law nor common sense. Society recognizes that we accommodate disabled forest visitors with wheel chair accessible toilets and opportunities to drive machines where others drive machines. However, disability is not a license for opening the forest to ORV's	
462	It would be a shame and a crime if handicapped people such s myself were denied the right utilize this area for hunting and fishing. With greater areas being closed to access it is getting nearly impossible for me to use public lands. Everyone is not capable of enjoying these lands without access and transportation	
284	Handicapped people are going to be locked out of this area based on their inability to get around on foot, rather needing a alternative mode of transportation (such as snowmobiles and ATV's).	
248	There needs to be more opportunities for the handicapped in the National Forests, the	

	alternatives don't do this. Please consider making more trail loop systems and connect them using roads, if necessary.
198	I recently got back from Seattle VA Hospital and I find it very unsettling that individuals who have lost mobility defending our great nation will only find more recreational land blocked from access. Why do you continue to let this happen? Why are our rights to pursue recreational activities of our choice on public property being eroded? We do want to have access to roads and trails that exist in non-wilderness areas
204	Any new restrictions will negatively impact the ability for disabled persons to have forest recreational opportunities. Many of the people I enjoy hunting and camping with advancing in their years and are not as physically able as they once were. It is essential these people maintain their ability to enjoy the forest with motorized use.
342	I am writing my concerns about the New Forest Service plan not addressing age or disabilities by ex veterans! and others. I am 60 years old and my father is 84 and a 100% disabled vet. The new proposals some of the roads are being closed for no definitive reason. You have plans to close the road up Sawmill creek and McGee coulee.
383	Without motorized access, many elderly and handicapped would not have any way to enjoy the area.the areas that I have enjoyed all my life are being threatened. I enjoy the "quiet experience" as well as the next person and there are currently areas (Bob Marshall, Scape Goat, Great Bear, Glacier Park and Yellowstone Park) designated to do just that. Moved to 1108.
557	Being from Neihart I know a lot of people who enjoy recreational driving for sight seeing and the ability to get into the interior of the forest to do this. Many of them including a lot of elderly can only do this from their car or pickup. They generally do not own ATVs and cannot walk any great distance.

**Summarized Comment:** Commentators generally expressed the need to have adequate access to the National Forest for the disabled and aging population and that any decision to close additional roads and motorized ATV trails will eliminate the disable communities opportunity and right to enjoy the National Forest.

**Response:** The DEIS on p. 55 under “Desired Condition” addresses the needs of the disabled to have access to the forest within the constraints of other resources. This is discussed for each alternative on pp. 64 and 70. There is no legal requirement that the Forest Service make all trails and roads open to motorized use for the disabled. Disabled access can be provided by a wide variety of motorized vehicles. See Tables III-2, III-3, III-5 , and III-6 for specific opportunities for riding stock, passenger vehicles, 4x4’s, and ATV’s on the forest. Although there is a reduction in total ATV riding miles in alts 2, 3 and 5 when compared to Alt 1, more then 1000 miles of riding opportunities remain in all action alternatives for all publics to enjoy the National Forest. Wheelchair access was not addressed in the DEIS because it was never raised as a significant issue. There is nothing to preclude the construction of future wheelchair trails in this analysis. Although not considered in the DEIS, each Ranger District on the Jefferson Zone has had for several years a disabled access hunting opportunity program to provide documented disabled members of the public motorized access opportunities into areas otherwise restricted to nonmotorized travel during hunting season.

**#342-** Sawmill Creek road #3313 was closed under the Dry Fork decision. McGee Coulee Road #3311 was considered as not having secured access, ROW or easement for the general public through the bordering private lands and determined that the area accessed by this road would only be accessible to private land holders either from the north or south of McGee Coulee. In all other alternatives McGee Coulee remains open.

<b>Subject Code:</b> RECREATION	<b>Category Code:</b> 1108
<b>Letter #:</b> 256	While the trails on the Front are beautiful, they are too challenging for someone my age and condition. I did hike the Pilgrim Creek trail in the Little Belts this summer, but also found it too strenuous for me. Montana ranks tenth in the nation in the percentage of the population over 65. It is important that the final EIS address this segment of the population. As we age, it is even more important that we find ways to exercise. The final plan should include quiet trails that can be enjoyed by older users, who do not enjoy riding machines.
429	Handicapped issues have not been addressed in any of the alternatives. I believe there needs to

	be trails and roads designated as usable by handicapped on the travel plan map. There are new ATV routes using old roads in the system which may be able to be designated for this use.
<b>Summarized Comment:</b> We need to have easy trails that are quiet and available for an increasingly aging population.	
<b>Response:</b> We have added a discussion of this in the “Opportunities for a full spectrum of summer recreational activities and settings”, under the direct effects section on disabled access. Table III-3 has been amended to show by alternative miles of this opportunity.	

<b>Subject Code: RECREATION</b>		<b>Category Code: 1108 / 1110</b>
<b>Letter #:</b> D-14	remote air strips are a fantastic way to transport emergency medical aid and disabled people to the backcountry. I know of no other way to get disabled t NV and handicapped people into remote areas to enjoy the solitude and wildness of it all.	
182	in your addressing the need for access for persons with disabilities, you completely ignored what aviation has to offer. Of all the means available to the disabled, access by aircraft is the least stressful and most accommodating. .	
<b>Summarized Comment:</b> Comments addressed the need for remote airstrips to better serve the disable community by providing access into the National Forest via aircraft and remote landing strips. Another comment felt that aircraft are an effective tool for providing emergency transportation.		
<b>Response:</b> The DEIS considered 5 potential airstrips and whether the proposed air strips met with forest plan consistency, WSA consistency and ROS objectives, Table’s III-10, 11 and 12. The DEIS (pages 78-83) discusses effects of proposed airfields. We will add a statement about disabled access provided by aircraft, but disagree with the statement that aircraft provide the least stressful and most accommodating access for the disabled. While that may be the case in remote areas away from roads, existing roads provide easy access to large parts of the analysis area by passenger cars and high clearance vehicles.		

<b>Subject Code: RECREATION</b>		<b>Category Code: 1109 - hunting</b>
<b>Letter #:</b> D-6	Would challenge you to document that illegal hunting would be significant.	
185	Seasonal closures in Deep Creek drainages are not needed. The elk population is in very good shape. If the area is not open until July 1 <sup>st</sup> there will be no bear hunting. The Forest Service already know they have a problem with bears in the Logging Creek area with season restrictions this will only enhance the problem.	
255	We do use our motorcycles on these trails to retrieve game which we have done many years. Some of these animals would have taken many days in even almost impossible to retrieve without the use of bikes.	
L-29	Deep Creek trail system stay open, because it is also a way to access the Smith River for fishing. Every year I ride trail 331 to go fishing on the Smith. I return in the fall to go grouse hunting.	
398	In the area I hunt over the years, I don’t think I would average seeing 1 group on foot other than an outfitter in the area maybe 2 groups of horses, hunters per year. Trails 303,307, and 312 are the trails I use most. I would really hate to see them closed because I’m getting older in years and walking 7 miles to a hunting area is going to be out pretty soon.	
399	I feel that the seasonal restrictions are to restrictive. Motorized use for spring bear hunting, will be completely eliminated in many areas.	
497	Hunters, use motorized equipment to hunt and get to our special hunting areas, where we can then walk off the trails to hunt and get our game out. With difficulty in achieving proposed animal harvests in many areas in Montana at present, areas where motorized use can be accommodated should be permitted (no Sept 1 closures (on) trails anywhere) changing the Oct. 15 closures to full season permitted motorized use should also be considered.	
531	The closures to the Deep Creek drainages in alternative 5 are what a seasonal closure from Oct. 15 through June 30 <sup>th</sup> . We will not be able to access anything during the bear season.	
539	Most of the alternatives in the 2006 draft plan don’t leave many opportunities for me to experience the silence and solitude I need when hunting.	
528	A final comment on the possibility of game law violations; although there are irresponsible	

	people within any user group, I do not feel that limiting access to all based on the possibility of this type of violation occurring is justifiable.
286	I read with particular interest today's newspaper and its report about proposed rules by Montana Fish Wildlife and Parks department to ban hunting by ATV users. I understand Idaho has adopted such an approach. This trend needs to be factored into your assessment of ATV demands for more miles of trail.
<b>Summarized Comment:</b> Challenge you to document how illegal game hunting would be significant. Seasonal and other restrictions would affect hunting opportunities, including bears and fishing on the Smith River, and are not needed. We don't see much horse or hiker activity where we recreate with motorized equipment. Avoid seasonal restrictions 1 September and make them 15 October. Consider banning ATV use when hunting. Game retrieval will be difficult without motorized access.	
<b>Response:</b> Reference is made to the DEIS, page 3 Purpose and Need, page 9 Relationship to the 3-State OHV Decision, and page 220 Wildlife and Fish. Motorized access to the Smith River is limited to meet the intent of the Smith River Management Plan. See p. 115. Some trails draining into the Smith River generate unacceptable levels of sediment into the Smith River and affect fish. Read the discussion in the Wildlife issue, particularly on big game species on pp. 231-237, including effects of motorized use at various times of the year. Alternatives present a wide variety of motorized and non-motorized opportunities. While some routes may be restricted to motorized use where users enjoyed motorized use in the past, many routes remain open for motorized opportunities in all alternatives except Alt. 4.	

<b>Subject Code: RECREATION</b>		<b>Category Code: 1109 - hunting, airstrips</b>
<b>Letter #:</b> 207	There isn't any data at all to suggest that pilots disregard the regulations governing hunting more than those who use horses, ATVs or who hunt on foot. Nor has any specific data about the outfitters who have a permit in the Deep Creek area been included in the draft travel plan to support the speculation about increased poaching. Not to use it as a scare tactic to turn the public opinion against a law-abiding group of citizen.	
217	Leave the hypothetical situations out of the equation and let the existing game laws of the state regulate the hunting and fishing opportunities. There are game laws in place at this time that regulate each of the hypothetical hazards mentioned in the draft EIS. For instance, flying and hunting in the same day are illegal.	
D-31	There is no evidence presented in the draft plan that the establishment of an airstrip leads to an increase in game law violations. This is merely a supposition, not based on data. It appears that the Montana Fish Wildlife and Parks Department was not consulted, even though they are the game law enforcement agency.	
273	The issue of "illegal outfitting" – to use this as a reason not to open airstrips in the mountains would only be legitimate if there was evidence that this type of practice was widespread and out of proportion to other types of poaching. If such evidence exists, it should be cited in the Plan. If none exists this argument, too, is specious and should be discarded.	
495	Recreational airstrips in Deep Creek Park more noise, affect wildlife, exclusive access, and encourage illegal outfitting. The illegal delivery service would be very difficult to monitor and to enforce outfitter-guide permitting requirements given the remoteness of the area. Avoidance, disturbance and displacement effects would likely be commensurate with frequency use similar to that which would be expected with other modes of motorized disturbances.	
<b>Summarized Comment:</b> Increase in game violations, illegal outfitting and livery services.		
<b>Response:</b> Reference is made to the DEIS, page 75 through 83, concerning airfields, pilots, potential for game violations, illegal outfitting and livery services. The potential for illegal outfitting is only one of several potential issues discussed. There was no intent to suggest that pilots are not law abiding, but the analysis looks at various possibilities, and illegal outfitting and livery services were concerns raised by Forest Service personnel who deal regularly with outfitter guide issues. This issue is of particular concern in remote airstrip proposals because of our lack of ability to enforce our outfitter-guide regulations. Coordination with the Montana Dept. of Fish Wildlife and Parks on airstrips was not specifically done, nor felt needed to be done, by recreation personnel working on this issue. Adherence to fish and game laws is greatly helped by the design of the travel		

plan to lessen opportunities for illegal use. The primary determinant for new airfield was whether they met the intent of management areas, wilderness study areas, ROS settings, and the Forest Plan. See Table III-10 through Table III-12 on p. 78. The department was closely coordinated with on wildlife issues between their and Forest Service biologists.

<b>Subject Code: RECREATION</b>		<b>Category Code: 1111 - 300 foot allowance to park/camp.</b>
<b>Letter #:</b> 282	In the DEIS, it states that under all alternatives “motorized wheeled vehicle travel off designated system roads and trails for parking and camping would be allowed within 300 feet.” In effect this decision will create a 600 foot corridor down each and every road or trail for vehicles to travel. From a management perspective, it will be virtually impossible to prove that someone is not looking for a parking or camping spot.	
33	In the DEIS the USFS states that under all alternatives “motorized wheeled vehicle travel off designated system roads and trails for parking and camping would be allowed within 300 feet”. In effect this decision will create a 600 foot swath down each and every road or trail for vehicles to travel. Nowhere in the DEIS does the USFS assess the direct and indirect or cumulative impacts of this significant decision.	
688	Allowing motorized vehicles to travel 300 feet off both sides of roads and trails to look for camp sites will encourage abuse and be almost impossible to enforce.	
431	I especially hope that you will reconsider the idea of allowing a motorized corridor 300 feet on each side of the trails. I am a bird hunter and I know for a fact that motorcycle riders hunt birds from their bikes. Any meadow anywhere near any motorized trail in bird country has tire tracks all through it during bird season. Motorized hunters hunt out the birds this way before hunters on foot ever get a chance. Why perpetuate this selfish, unethical and criminal practice by motorized hunting? Go look at Yogo Peak. Motorized users have been all over those wet meadows. They are genetically unable to leave their bikes at the side of a trail and walk fifty feet. Hunters cannot pack out an entire animal on a four wheeler or motorcycle without cutting it up. If a motor head cannot cut up an animal and carry it 300 feet to his noisy stink mobile he should not hunt. The idea that is is necessary to cruise over the ground 300 feet each side of the trail to find or set up a camp is a joke. This 300 foot rule is an invitation to abuse, which is already clearly occurring everywhere, and which needs to be stopped, not encouraged.	
612	The maximum distance off road parking or camping should be 50 yards not 100 yards.	
635	The DEIS proposes to allow ORV’s to drive 300 feet off roads and trails to set up camps. This provision means that there is a 600 foot wide ORV path wherever there is an ORV route. The proposal is arbitrary and capricious because there is no analysis of the impacts on wildlife, aquatic life, vegetation, and soils from this activity. There is no analysis of a narrower corridor. There is no analysis of a requirement to park and walk to a campsite. There is no standard for determining when damage will result in closure. The driving corridors invite off trail driving is contrary to the purpose of the travel plan. Driving off trail is what caused much of the damage now present in the Jefferson Division.	
<b>Summarized Comment:</b> Commentators do not like the 300-foot allowance off roads and trails because of the potential for motorized users to abuse the resource.		
<b>Response:</b> The Forest is working to develop direction that is in agreement with national direction. It will change the description of acceptable travel within the 300’ corridor that was described on p. 17 of the DEIS for all alternatives. Instead, this corridor can be used to access dispersed recreation sites only via routes signed as open for access to these sites. People will be allowed to park off the road in these areas, as long as they park immediately adjacent to the road. They will also be allowed to turn around using part of this area. No cross-country travel in this corridor will be allowed, except to turn around or park, as described.		

**ROADLESS / WSA / WILDERNESS COMMENTS/RESPONSES**

General comments: Several commentators stated that there were already enough quiet areas, particularly along the Rocky Mountain Front, that the Little Belts, Castles, and north Crazy Mountains should be designated for motorized uses. Some felt areas in which motorized uses may be restricted would become de facto wilderness areas. Others opined that motorized uses should be prohibited in inventoried roadless areas or wilderness study areas. One stated that “road-less and policy statements need to be updated to specify "foot and horse traffic only"” to provide maximum protection to these areas”. Others opposed any prohibitions to motorized uses in these areas. Specifically mentioned was opposition to prohibiting snowmobile use in wilderness study areas. Preference was given to alternative 4 for those who favored eliminating motorized uses in inventoried roadless areas or WSAs. Some felt large blocks of quiet areas should be designated and suggested roadless areas such as Tenderfoot-Deep Creek, Middle Fork Judith, Pilgrim Creek, Big Baldy, and Hoover Creek areas be considered. Others felt the Crazies should be a non-motorized area as it is not as user friendly.

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1201– Effects on wilderness potential
<b>Letter #:</b> 688	Backcountry Recreational Airstrips - No recreational backcountry airstrips should be authorized in the Middle Fork of the Judith Wilderness Study Area. ...Creating recreational backcountry airstrips will impact these areas with more noise, diminish the sense of remoteness, provide exclusive access, affect wildlife, and encourage illegal hunting. Legislation has been introduced in Congress to make difficult or impossible for federal public land managers to close backcountry airstrips. Therefore the establishment of airstrips in the Little Belts would make a commitment to airstrips "irretrievable" thus affecting the suitability of the Middle Fork of the Judith WSA and the Deep Creek Roadless Area for potential wilderness designation.	
33	Is the Travel Plan’s authorization of OHV use over the life of the Plan consistent with the MWSA, Forest Service policy (Forest Service Manual 2329 Interim Directive on Montana WSAs), and managing the WSA for its wilderness character? Likewise, how will the authorization of airstrips and their associated impacts, construction, maintenance, and operation impact the WSA and IRAs? MWA suggests that the USFS adopt a specific plan for the WSA and explore using the Limits of Acceptable change ("LAC").	
282	In proposing activities within the WSA, the Lewis and Clark National Forest must consider how any proposed activity will impact the wilderness character of the WSA and its potential for inclusion into the National Wilderness Preservation System. The Forest Service has been enjoined by a district court judge from taking any action in any Montana Wilderness Study Area that diminishes the wilderness character of the area as it existed in 1977. In 1977, the wilderness character of the Middle Fork of the Judith was not impacted by modern all-terrain vehicles (ATVs) or high-horsepower snowmobiles. The marketing of ATVs and other ever evolving and more powerful off road vehicles, didn't exist in 1977. ORV marketing should not determine use in public wildlands.	
360	As far as the nearby Semi-Primitive Non-Motorized (SPNM) part of the WSA is concerned, aircraft landing and taking off [at the Middle Fork Judith airfield] would not impact the area. Landings at this location would be made upstream and take offs made down stream, both flying over private land.	
14	Wilderness designation based on Forest Service studies done in 1982. Therefore, the nearby WSA should not be a reason to deny the establishment of an airstrip in the Lost Fork drainage.	
D-31	The WSA in the Lost Fork area does not meet criteria for Wilderness designation based on Forest Service studies done in 1982. Therefore, the nearby WSA should not be a reason to deny the establishment of an airstrip in the Lost Fork drainage.	
273	I would be very interested in your interpretation of this situation. If it is true that this WSA does not meet qualifications for Wilderness, then I would suggest this argument should not be used against the airstrips.	
D-66	The WSA in the Lost Fork area does not meet criteria for Wilderness designation based on	

	Forest Service studies done in 1982. Therefore, the nearby WSA should not be a reason to deny the establishment of an airstrip in the Lost Fork drainage.
<b>Generalized comment:</b> Several commentators felt allowing an airstrip in the Middle Fork Judith Wilderness Study Area (WSA) was inconsistent with Forest Service policy for management of such areas and would be an irretrievable commitment that would affect the suitability of the area for possible inclusion in the wilderness preservation system. Another person felt the area had been studied for its wilderness values and was not recommended for wilderness; therefore the WSA status should not be a reason to deny the establishment of an airstrip in the Lost Fork drainage.	
<b>Response:</b> The Forest is required to consider the effects of agency actions on the wilderness character of WSAs. Although they were not recommended for wilderness inclusion during development of the Forest Plan, the Plan states that these areas will be managed to protect their wilderness character until Congress takes final action on the Forest Service's recommendation. The DEIS on pages 78 and 83 talks to consistency of airstrips with management of wilderness study act areas. It notes that construction or re-establishment of airstrips in the Middle Fork Judith WSA could affect the suitability of the area for wilderness designation. The analysis talks to the introduction of noise into the area from aircraft and possible effects to solitude and feelings of isolation.	

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1201– Effects on wilderness potential and 1202 – Effects on wilderness character
<b>Letter #:</b> 473	I am deeply opposed to motorized use of the Tenderfoot-Deep Creek area. I fully support keeping this area in a natural state for the enjoyment of future generations.	
554	The Tenderfoot Deep Creek roadless complex is also the crown jewel of the Jefferson Division of the LCNF, and should be protected. How can you allow motorized use in an area that has been nominated for Wilderness area in Central Montana? If you allow motorized use it will nullify the opportunity of wilderness designation forever because you'll never get the motorized groups out!	
495	The Tenderfoot Deep Creek Roadless Area has been included in several wilderness bills and many of the surrounding landowners have obtained perpetual conservation easements to enhance the area's wilderness character. There are no designated wilderness areas on national forest lands in central Montana and the Tenderfoot Deep Creek Roadless Area remains one of the few areas that has retained its wilderness character. Encouraging continued motorized vehicle use is inconsistent with the efforts of many landowners and the state of Montana to protect the primitive character of the Smith River corridor. The Forest Service should honor the efforts that have been made to protect the area and preserve the option of wilderness designation for future generations.	
130	The Tenderfoot Canyon is one of the most beautiful, peaceful, undisturbed regions that can be found anywhere in the country. I believe it should even be considered for full Wilderness Area status.	
111	The Deep Creek Tenderfoot has had two studies made by the Forest Service in my life time and both studies came up with the same conclusion that the Deep Creek Tenderfoot area should be included in some kind of wilderness. It also has been included in several wilderness bills.	
469	Your consideration regarding land use along the Smith River and Tenderfoot Creek. As a frequent visitor to the area I appreciate the fact that this area has been kept in a primitive state, undeveloped and largely motor-free.	
634	I would like to see the Deep Creek/ Tenderfoot roadless area protected for its pristine qualities.	
<b>Generalized comment:</b> Several commentators felt the Deep Creek/Tenderfoot/Smith Creek areas should be closed to motorized use, citing efforts by Montana Fish, Wildlife and Parks and others to regulate uses in the Smith River corridor and past wilderness bill efforts that have included the Deep Creek/Tenderfoot area. Some felt allowing motorized uses in this area would negatively affect wilderness consideration in the future.		
<b>Response:</b> The DEIS considered an alternative (Alternative 4) that would eliminate all motorized uses from the Smith River corridor, along Tenderfoot Creek and within the Deep Creek area. The DEIS (pages 120-121, 149-151, 155) discusses impacts to wilderness or primitive qualities in these areas under the various alternatives analyzed.		

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1202 – Effects on wilderness character
<b>Letter #:</b> 563	The Middle Fork of the Judith Wilderness Study Area, Pilgrim Creek, Tenderfoot Deep Creek and the Hoover Creek area have retained much of the wilderness character and deserve to be designated as non-motorized. [This] will best protect fish and streams, elk security, minimize the spread of noxious weeds and make law enforcement easier.	
33	...summer alternative 3 "would increase the total miles of two-track motorized routes (ATV and 4x4) in the WSA above existing levels and that in 1977 (DEIS @153). The same is true of summer alternatives 1 and 5. Back in 1977, there was no ATV use in or adjacent to the WSA. Now, the USFS's alternatives 1, 3, and 5 will authorize ATV use directly within the WSA. The USFS's unofficial "preferred alternative" - alternative 5 - will authorize 13 routes of new ATV trails in the WSA and, as discussed above, a new airstrip in the middle of the WSA. See Table IT-50. Again, such an alternative that allows for a network of roads, motorcycle and ATV trails, airstrips, or snowmobile access for continued and increased and loud use of the WSA will continue to adversely impact the WSAs wilderness character and prejudices the WSAs chances of being included in the National Wilderness Preservation System. On their face, such alternatives are illegal.	
615	The areas which have largely maintained their wilderness character and should be priorities include the Tenderfoot Deep Creek roadless area, Pilgrim Creek roadless area, Hoover Creek area and the Middle Fork of the Judith Wilderness Study Area.	
<b>Generalized comment:</b> Other commentators specifically mentioned Pilgrim Creek, Hoover Creek and the Middle Fork WSA as areas that have largely maintained a wilderness character and felt these areas should be non-motorized in order to retain those qualities. Another felt that alternatives that would allow for a network of ATV or motorcycle routes or airstrips in the Middle Fork would adversely impact the wilderness character of the area, would prejudice potential inclusion of the area into the wilderness preservation system, and would be illegal.		
<b>Response:</b> Pilgrim Creek is within the Pilgrim Creek inventoried roadless area (IRA). Hoover Creek is within the Big Baldy IRA. The DEIS (pages 147-155) discusses effects of alternatives on wilderness character of these areas, as well as the Middle Fork Judith WSA. It notes that some alternatives, or aspects of alternatives, could adversely affect certain wilderness characteristics, such as the introduction of a new airstrip in the Lost Fork Judith portion of the Middle Fork WSA.		

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1203 – Wilderness Study Act area comments
<b>Letter #:</b> 132	Judith Wilderness Study Area needs to be protected until formal designation is made on its wilderness designation. Stopping the motorized access now preserves the wilderness qualities and the habitat.	
313	The draft discusses construction of a new road down Arch Coulee and the abandonment of the present Middle Fork road alignment. Discussion should include the rationale of constructing a new road in a Wilderness Study Area when a road already exists and has existed for 100 years. A comparison of the impacts to wilderness values of a new road and a road pre-dating the Wilderness Study Area designation should be fully analyzed.	
612	Your DEIS Statement (p. 21) regarding WSAs and roadless area management seems to be in opposition to recent and historic wilderness policy. Within DOI my experience in the Washington Office made it very clear no deterioration of WSAs was permitted until Congress had acted on Department proposals.	
635	Middle Fork of Judith-now is the time for Wilderness: It is time to honor the WSA status of the Middle Fork and eliminate motorcycles and ATV's. It is time for the FS to recommend wilderness status for the Middle Fork.	
498	There are barely a dozen roadless areas in your distinct of the forest, plus the Middle Fork of the Judith Wilderness Study Area. At a very minimum, these should be kept motor-free. Not only is it the law (unless you can legally document prior use), they comprise the wildest parts of the district. These are the most appropriate places to offer opportunities for traditional recreation.	
33	Under NEPA, the USFS has a procedural duty to take a hard look at the impacts of the	

	<p>proposed Travel Plan on all WSAs; how the existing and proposed transportation system (including airstrips, all motorized routes, and user created routes) impacts the wilderness character of these areas; and (2) how the increase in the amount and types of use will continue to impact the wilderness character of these areas.</p> <p>USFS must prohibit all motorized use and airstrips in the WSA and take reasonable steps to restore any and all existing motorized roads and trails. Managing the WSA as motor-free will protect the wilderness character of the WSA and prevent continued damage to the area's wildlife habitat, fragile soils, and watersheds. Conversely, adopting an alternative that maintains a network of OHV trails, roads and airstrips in the WSA (or even adjacent to the WSA) is entirely inconsistent with the MWSA and the USFS's duty to maintain the WSA's wilderness character.</p>
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**Generalized comment:** Quite a number of commentators felt the Middle Fork Judith WSA should be non-motorized to prevent any deterioration of its wilderness qualities. One asked for a comparison of effects to wilderness quality from any new road down Arch Coulee compared to the present road that has accessed private land within the WSA for many years. Some comments indicated a belief that designation of an area as inventoried roadless or wilderness study should mean that no motorized uses be allowed in those areas in order to retain their potential for possible future inclusion in the wilderness preservation system.

**Response:** As the DEIS states on page 21, there is no specific direction in the 1977 Wilderness Study Act to prohibit all motorized uses with a WSA. Congress can designate an area as wilderness that contains roads or that currently allows for motorized uses; such uses may not be allowed to continue once formal designation takes place. The scope of this travel plan analysis does not include wilderness recommendations. That is more appropriately undertaken during Forest Plan revision. The analysis does, however, assess the impacts of the various travel management alternatives on the potential for the Middle Fork Judith wilderness study area to be included in the wilderness preservation system (see DEIS pages 128-155). Specific discussion of relocating access to private land within the Middle Fork Judith WSA is presented on pages 149, 152 and recognizes possible impacts to opportunities for solitude and apparent naturalness under alternatives that identify an alternate road location to access private in-holdings. It also recognizes affects to apparent naturalness from the existing route which crosses the Middle Fork Judith River over 20 times (DEIS pages 141), but notes that such impacts have not changed dramatically since 1977.

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>	<b>Category Code:</b> 1204– Inventoried roadless area comments
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<b>Letter #:</b> 8	The Roadless Rules is all about preventing new roads from being constructed; it is not banning motorized use of existing motorized roads and trails. This project must include proper interpretation of the Roadless Rule and the roadless rule should not be used to close existing motorized routes in roadless areas.
15	Inclusion of user created roads in roadless areas that will be open to motorized traffic and incorporated in the forest road system is a plain violation of the January 12, 2001 Roadless Area Conservation Rule, which prohibits roadless area road building, defined as any "activity that results in the addition of forest classified or temporary road miles." 36 CFR §294.11.
33	The USFS needs to assess how any proposed Travel Plan may impact the Governor's ability to protect all inventoried roadless areas under the new petition process. ... Moreover, even under the new State Petitions Rule, it will be extremely important for the USFS to manage all 17 IRAs in the analysis area as a means of preserving and not prejudicing Governor Schweitzer's ability to nominate these areas for roadless area protection.
433	The roadless rule has thankfully been restored by the Courts and you should take time to reconsider your travel plan options and make sure that the rule and its goals are being advanced by your decision.

**Generalized comment:** Several commentators mentioned the Roadless Area Conservation Rule. One stated that designating user-created roads in roadless areas as part of the Forest's transportation system was a violation of the roadless rule. Another felt the rule should not be used to close existing

motorized routes in roadless areas. Another asked that the forest assess the impacts of travel planning on the Governor's ability to nominate roadless areas for protection under the State Petition Rule.

**Response:** On September 20, 2006, the United States District Court for the Northern District of California set aside the 2005 State Petitions Rule and reinstated the 2001 Roadless Rule. The ruling prohibited the Forest Service from taking further action in inventoried roadless areas inconsistent with the 2001 Roadless Rule. This included actions such as approving any management activities in inventoried roadless areas that would be prohibited by the 2001 Roadless Rule, and issuing or awarding leases or contracts for projects in inventoried roadless areas that would be prohibited by the 2001 rule. The DEIS on page 149 defines what constitutes "new road construction" and page 151 identifies undetermined routes that would be converted to system roads under the various alternatives. The agency is still under interim directives (1920-2006-1) that specify authorities and exceptions for approval of road construction (or, in this case, inclusion of undetermined roads as part of the Forest transportation system) in inventoried roadless areas. These directives reserve to the Chief the authority to approve or disapprove road construction in inventoried roadless areas unless or until a forest-scale roads analysis is completed and incorporated into the unit's forest plan (FSM 7712.13b). The Lewis completed a Forest Scale Roads analysis in January 2003 (available for review on our intranet site at [www.fs.fed.us/r1/lewisclark/](http://www.fs.fed.us/r1/lewisclark/). Click on Projects & Plans and go to the Forest Roads Analysis Report link listed under L&C National Forest Resource Planning. The Forest Supervisor incorporated this roads analysis into the Lewis and Clark Forest Plan on October 15, 2004.

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1204– Inventoried roadless area comments
<b>Letter #:</b> 33	Tenderfoot Deep Creek Roadless Area - one of the last places in the Little Belt; which has retained its wilderness character and still provides important habitat for westslope cutthroat trout and excellent habitat for elk, mule deer, black bear, mountain lion, and grouse - MW A is particularly concerned about the USFS's proposal in summer alternative 5 to reroute Trail 311 by constructing a new A TV trail around the private in holding of Gary Anderson. ... Why does any new trail need to provide for motorized access in the IRA? If the proposed trail is built and motorized access use occurs, it will allow OHV users to connect up to network of motorized trails. It is no secret that the OHV users intend to develop such a link. Does the USFS have a plan to prevent OHV use from exponentially increasing into the area and becoming better established or is the USFS on board with increased OHV access to the Tenderfoot/Deep Creek Roadless area?	
<b>Response:</b> The agency did not identify a preferred alternative in the DEIS. It considered a range of possible actions for the Tenderfoot Deep Creek area, and specifically for Trail #311...from construction of an ATV route around the private land in Deep Creek that connected to other motorized routes, to non-motorized uses for all trails in the area. The selected alternative could consider any combination of route designations.		

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1206– Consistency with adjacent land management
<b>Letter #:</b> D-28	The Northern Crazy Mtns. must have access in the Cottonwood area. We ride snowmobiles from the Gallatin N.F. side onto the L&C side all winter. It seems the Gallatin side will be open and the L&C side closed. All the area around Target Rock, Forest Lake and Cottonwood should remain open to both snowmobiles and ATVs.	
8	There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction, resulting in an overall loss of motorized recreation opportunity.	
33	The DEIS does not clearly define the scope of the cumulative effects analysis. ... For example, the Crazy Mountains are divided between the Lewis and Clark National Forest and the Gallatin National Forest. The Lewis and Clark National Forest manages the western half of the northern Crazy Mountains and the Gallatin National Forest manages the eastern half of the northern Crazy Mountains, the two National Forests have failed to adopt consistent management standards and guidelines for managing the same road or trail in the Crazy Mountains. For instance, as outlined in the DEIS, route #8913 on the Lewis and	

	Clark side is currently open seasonally to all forms of motorized vehicles, but the same connecting route on the Gallatin National Forest is currently closed yearlong to jeeps but open seasonally to ATVs.
<b>Generalized comment:</b> Several commentators noted discrepancies in travel management between administrative boundaries of the Lewis and Clark and Gallatin Forests in the Crazy Mountains. Concern was voiced over trails being open to motorized uses on one unit only to connect to routes that may be closed to such uses on the other unit. Specifically mentioned were snowmobile opportunities in the Target Rock, Forest Lake, and Cottonwood areas, and route #8913.	
<b>Response:</b> The DEIS at pages 123-127 noted several discrepancies with possible travel management alternatives between the Gallatin National Forest portion of the Crazy Mountains and the Lewis and Clark-managed portion. Additional dialog has taken place between the units. The Gallatin Forest has released their travel management plan decision (10/30/2006) and adjustments have been made to reduce conflicting travel management determinations in the Crazies. The FEIS will reflect a comparison between alternatives and the Gallatin decision.	
The area around Target Rock is open to snowmobile use on both the Gallatin and L&C sides under L&C winter alternatives 1 and 3. Topography limits the extent of snowmobile travel across administrative boundaries in much of this area of the Crazies, but consistency in travel management is desirable. Additional changes to ensure consistency could be made in the final selection for travel management on the Lewis and Clark.	

<b>Subject Code:</b> <b>ROADLESS/WSA/WILDERNESS</b>		<b>Category Code:</b> 1206– Consistency with adjacent land management
<b>Letter #:</b> 33	In managing the Tenderfoot Deep Creek Roadless Area, the USFS will need to take into account and comply with the Smith River Management Plan. Opening the Tenderfoot/Deep Creek IRA to increased motorized recreation and its associated impacts on water quality in the watershed is not in compliance with the letter and spirit of the Smith River Management Plan.	
554	Local landowners have been working hard to protect the wild, peaceful and scenic qualities of the Tenderfoot-Deep Creek - Smith Canyon complex by putting conservation easements (a considerable financial sacrifice) on their property. The state (FW&P) is against motorized access to the Smith River canyon because it is trying to protect and manage the wild, scenic and peaceful quality of the floating experience as well as protect the quality of the fishery.	
246	The Forest Service, Montana Department of Fish, Wildlife and Parks, many area landowners and the general public have gone to great lengths to protect the Smith River corridor by adopting regulations which limit floater impacts, restrict inappropriate access, and placing of conservation easements to limit development and protect the open spaces and habitat for which this area is renowned. It seems contradictory and inconsistent to now enable further motorized access into the Smith River corridor where so much energy and effort have been expended to protect its primitive character.	
540	Of particular interest and concern to me and my family is to limit motorized impacts into the Smith River corridor through the Tenderfoot Deep Creek drainages. The Forest Service, Montana Department of Fish, Wildlife and Parks, many area landowners and the general public have gone to great lengths to protect the Smith River corridor by adopting regulations which limit floater impacts, restrict inappropriate access, and placing of conservation easements to limit development and protect the open spaces and habitat for which this area is renowned.	
559	Of particular interest and concern to me and my family is to limit motorized impacts into the Smith River corridor through the Tenderfoot/Deep Creek drainages. The Forest Service, Montana Department of Fish, Wildlife and Parks, many area landowners and the general public have gone to great lengths to protect the Smith River corridor by adopting regulations which limit floater impacts, restricting inappropriate access, and placing conservation easements to limit development and protect the open spaces and habitat for which this area is renowned. It seems contradictory and inconsistent to now enable further motorized access into the Smith River corridor where so much energy and effort have been expended to protect its primitive character.	

**Generalized comments:** Several commentators noted the efforts made by Montana Fish, Wildlife and Parks, along with the Forest Service and local landowners to develop regulations for access and use of the Smith River corridor and felt that allowing motorized use along the corridor would be inconsistent with those efforts.

**Response:** The DEIS at pages 115, 118-122 notes the direction provided in the Smith River Management Plan and discusses potential impacts to such aspects as solitude and semi-primitive recreation opportunities under the various alternatives. The DEIS discusses peak season of use for floaters and notes that motorized access to private lands on the western border of the Smith River corridor is largely uncontrolled. The DEIS provides a range of alternatives, from no motorized access to the Smith River corridor, to an increase of motorized use over existing levels.

**SOCIAL COMMENTS/RESPONSES**

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1300</b>
<b>Letter #:</b> 8	The agency should commit the resources and has an obligation to evaluate the needs of OHV recreationists at a least the same level of detail as wildlife and natural resources areas. Site specific analysis includes adequate identification and inventory of all existing motorized routes and adequate evaluation of the public’s need for those routes.  We are concerned about the protection of our western culture. This culture is characterized by access to the land for multiple-uses, friendliness, good neighborliness, tolerance and sharing. We request that multiple-use management principles be used to protect western culture and values including access to the land for multiple-use, friendliness, good neighborliness, tolerance and sharing.	
19	The constant threat of legal action by environmental groups appears to have caused the USFS to take an unbalanced approach to travel planning. Motorized recreation has been recognized as a legitimate use of the National Forest lands by the Chief of the Forest Service and deserves to be addressed in a fair and equitable manner. A fair and objective proposal has not appeared in Montana, and managed use is not identified.	
221	Overall the areas covered by this travel plan have been and continue to be one of the few places where there is adequate motorized use available. I and my neighbors and lots of friends is adequate to this area because it is the last best, and only to a large extent, motorized use area in Montana.	
230	As a hiker, bird-watcher, wildlife preservationist, horse-back rider and wilderness advocate, I’m alarmed that there are only 60 some miles of quiet hiking/horseback trails compared to several hundred or more motorized roads and trails.	
282	Under the current travel plan, adopted in 1988, there are almost 1,200 miles of bladed roads, 436 miles of “high clearance roads” and over 500 miles of trails open to some type of off-road vehicle use in the Little Belt Mountains. By contrast, only 62 miles are designated as quiet trails! The miles of roads and trails open to motorized use compared to quiet trail use are equally lopsided in the Castle and North Crazy mountains. Clearly use on the forest is out of balance, and needs to be restored!  As public policy, and a solution to travel management, the demand that people on foot and horse “share the trails” with machines falls flat. Given the option, forest recreationists-in overwhelming numbers- seek quiet non-motorized trails. The 1994 “Montana Trail User Study” found that 84% of state equestrians and 89% of Montana hikers feel ORVs are “incompatible” uses. A motorized dirt bike can cover in an hour what it takes a hiker or horseman the better part of a day. The Jefferson Division is central to four of Montana’s seven major population centers –Billings, Bozeman, Helena, and Great Falls. Many folk in these centers would like close access to large blocks of motor-free public land.	
522	Taking trails and areas away from recreationists who have enjoyed them for many years will create the greatest potential for social conflict	
524	Alternative 2: Need to be set aside for the use of hikers only. There seems to be an unbalance in how the land is being appropriated.	
578	We live in an uncertain world today, one of turmoil and fighting around the globe. A federal agency such as the Forest Service has the ability and an obligation to provide people with a	

	place to safely recreate and escape the problems of their everyday lives.
638	I disagree with creating “quiet areas” at Logging Creek for the following reasons: 1. Montana has 4.8 Million acres of wilderness if people want a quiet area. 2. I gladly share the trails with recreationists of all kinds. 3. In over 30 years of recreating at Logging Creek I have only seen 15 people hiking maximum. It seems a tremendous waste of resources to restrict motorized travel for one hiker every other year.
556	<p>We live in a uncertain world today, one of turmoil and fighting around the globe. A federal agency such as the FS has the ability and an obligation to provide people with a place to safely recreate and escape the problems of their everyday lives.</p> <p>Motorized use on public lands is the fastest growing sport in the US today. One of the reasons for this trend is the aging population and the retirement of a segment of the population known as the “baby boomers”. These people have money to spend and time to recreate. Many of these people are physically challenged and need some sort of transportation to assist them in the ability to enter our public lands.</p> <p>Closing large blocks of land to motorized use will concentrate use and result in more conflicts and damage to the resources. Taking away trails and areas from recreationists who have enjoyed them for many years will create the greatest potential for conflict</p>
<p><b><i>Summarized Comment:</i></b> These letters address the need for balanced use, the need to recognize the growing nature of motorized recreation; the desire to protect existing motorized opportunities; and the desires of others to have more quiet non-motorized areas to recreate. Concern was expressed that social conflict between users will increase if motorized recreation trails are reduced, concentrating use.</p>	
<p><b><i>Response:</i></b> The Forest Service is obligated to meet the resource requirements of the Lewis and Clark Forest Plan, the 3 State OHV EIS, and existing manual direction. Resource needs are spelled out in those documents and are discussed in the DEIS, pp. iii through v. The section on <b>Travel Management Objectives for Project Area</b> describes the objectives and goals of Forest Service Manual direction, including providing a balance of opportunities for people to access and enjoy the outdoors. The section on <b>Relationship to Forest Plan</b> describes how the plan’s goals and objectives provides the types of services and goods to be provided (including recreation), while the plan’s management standards and guidelines set the environmental sideboards within which the activities can be carried out. On p. iii the <b>Purpose and Need for Action</b> describes how the purpose of the new travel plan is to provide the public with opportunities for both motorized and non-motorized recreation. The fact that motorized use is growing does not mean that the forest can necessarily accommodate it like it has in the past and meet resource protection requirements. Indeed, the growth of a recreation activity is not grounds to violate requirements contained in the Forest Plan and other regulations.</p> <p>The Forest has evaluated roads and trails and the need for recreation just as completely as it has other resources. Transportation corridors have been evaluated one by one using a multiple resource team to recommend how each trail or road would be managed.</p> <p>The issue of balance is one strived for across the forest. There are a variety of alternatives that address the needs of the recreation community. There is a wide array of public needs and views, including the motorized and non-motorized recreationists. The selected alternative will be the one that best addresses the needs of all resources, including human and non-human.</p> <p>It should be understood that balance needs to be looked at on a national forest basis, rather than strictly at the level of planning being done for this EIS. Cumulatively, we have also looked at a multiple forest level (see the analysis on pp. 84-93.)</p> <p>Making everyone happy with the selected alternative is an impossibility. People will need to recognize the importance of getting along. The selected alternative will provide separation for those recreationists that can’t, by creating a variety of ROS settings (see pp. 50-74).</p>	

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1300</b>
<b>Ltr #</b> 185	By closing more trails you are putting more and more people into smaller areas that cause more conflicts.	
252	Further concentrating use into smaller and smaller areas has no benefit, it merely results in more traffic in the remaining areas.	
337	Closing large blocks of land to motorized use will concentrate use and possibly result in more conflicts and damage to the resources.	
342	You want to put more motorcycles on less trails which is just going to create more erosion problems and less help from the motorcycle club.	
383	It has been obvious to me that the Little Belts have had an increase in motorized use over the years and to reduce the areas with in them for motorized use will cause a lot of congestion which could lead to accidents and increased US Forest Service liability/enforcement costs.	
578	Closing large blocks of land to motorized use will concentrate use and result in more conflicts and damage to the resources	
<b>Summarized Comment:</b> Closing more trails and large blocks of land will concentrate use and create more damage to resources and conflict with other users.		
<b>Response:</b> Increased motorized use, including ATV use, since the last travel plan, has resulted in the need to reduce motorized use in some trails on a case by case basis. Presently, the large majority of the analysis area trails is open to motorized use. This would concentrate use on a smaller number of trails, and concentrate the impacts of motorized vehicles. Table III-3 shows that the existing situation allows 89% of all trails in the analysis area to be motorized. Many individuals think this is out of balance with the needs of the non-motorized recreating public. Alternative 4 would reduce motorized trails to about 25% of the total system trails. All other action alternatives allow motorized use to continue on the majority of existing trails.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1300</b>
<b>Letter #:</b> 545	I also know that the population of Lewistown is steadily increasing. Many say this area of Lewistown is the next "Bozeman". Has an increase in human population to the area been considered?	
<b>Response:</b> The economic and social area is defined by the following 13 counties: Glacier; Toole; Pondera; Teton; Choteau; Lewis and Clark; Cascade; Judith Basin; Fergus; Meagher; Wheatland; Golden Valley; and Musselshell (DEIS p. 157). Lewistown provides a small part of the recreationists using the Forest. The issue <b>Current and Potential Use Levels by Activity</b> starts on p. 95 of the DEIS. Pp. 100-106 describe the National Visitor Use Monitoring results, and how use by county was determined for the forest. It is that data we used in projecting recreation activity levels for the future.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1300</b>
<b>Letter #:</b> 555	Policies and decisions that discriminate against user groups are unlikely to be effective and undermine the authority of the Forest Service and similar Agencies by making them appear partisan or subject to special interest group influence. The road and trail closures currently envisaged in the Services draft plan are indicative of just such discrimination and special interest influence.	
<b>Response:</b> The DEIS Summary, pp. iii through viii gives a good explanation of the Purpose and Need for the travel plan revision proposal; decision framework, including how the agency will review potential restriction needs on certain trails; travel management objectives, including the need for a balance between different often competing uses; significant issues, and alternatives developed. Pp. 14-16 describe the significant issues developed. Balancing the needs of various public recreationists and groups is a balancing act between meeting public needs, protecting existing resources, and minimizing conflicts. As a result, there may be some feeling of being discriminated against by one user group if it does not obtain what it wants in one particular area, road or trail on the forest. We seek a balance that will provide all user groups opportunities somewhere in their national forest to pursue their form of recreation without impacting resources.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1302</b>
<b>Letter #:</b> 8	Evaluations and decisions have been limited to natural resource management issues. Issues associated with motorized access and motorized recreation must be adequately addressed during the evaluation and decision-making including social, economic, and environmental justice issues. Social issues must be adequately evaluated per the SOCIAL IMPACT ANALYSIS (SIA) PRINCIPLES AND PROCEDURES TRAINING COURSE (1900-03) ( <a href="http://www.fs.fed.us/emc/nepa/includes/sia.html">http://www.fs.fed.us/emc/nepa/includes/sia.html</a> ) and Environmental Justice issues per Departmental Regulation 5600-2. The evaluation and resulting decision must adequately consider and address all of the social and economic impacts associated with the significant motorized access and motorized recreational closures.	
<b>Response:</b> Social, economic, and environmental justice issues were addressed in the DEIS (pages 156 – 165, 292). Social conflict and potential economic effects were identified as significant issues, and were thus addressed in detail. There is no requirement (policy or legal) to evaluate social issues per the Social Analysis for Planning and Decision-Making Course (1900-03).		
Executive Order 12898 requires the agency to consider disproportionate effects to minority and/or low income communities/groups; none were found.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1302</b>
<b>Letter #:</b> 8	Resource allocation must include access to an equal number of quality recreational opportunities including alpine lakes, rivers, streams, and overlooks. We are not aware of any law that precludes motorized recreationists from enjoying equal access and allocation of the same resources that non-motorized recreationists enjoy. Equal opportunity laws, case law precedents and agency guidance have clearly established that the goal for the agency should be equal opportunity for all visitor groups. Motorized recreationists should have a reasonable allocation of quality recreation opportunities but the do not under existing conditions and the disparity is worsened by the proposed actions.	
<b>Response:</b> As presented in a May 25, 2006 letter from the Chief, U.S. Forest Service to “All Employees,” equal opportunity laws, agency guidance, and policy tend to regard “equal opportunity” in respect to “customers’ civil rights” and “individual civil rights and freedom from discrimination....”		
As stated in the DEIS (p. 54) “...it is the policy of the Forest Service to maintain opportunities for a variety of motorized and non-motorized activities, and to manage OHV recreational activities within the capability and suitability of the resources (FSM-2355.03). The Forest Service attempts to find a balance between competing interests to maintain a mix of opportunities to enjoy the National Forest.” This Travel Management Plan DEIS documents the attempt to do so.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1303</b>
<b>Letter #:</b> 253	How can individuals help to see that enforcement and maintenance gets the share of the budget needed.	
<b>Response:</b> This can be approached at the individual and club level. Individuals need to know the travel plan requirements. They will be simpler than the existing travel plan. Individuals seeing violations should report the incident to Forest Service law enforcement personnel with enough information to identify the alleged violators, including license plates, descriptions of individuals involved, when, where, and what was witnessed that was a violation. When citizens are willing to do this, they help protect their national forests from those who would disregard regulations regarding its use. Groups can meet with Forest Service personnel to learn about the travel plan, its requirements, and how to act as citizens in helping enforce the plan. A combination of public education; citizen willingness to comply with the travel plan and turn in violators; and Forest Service law enforcement can provide adequate enforcement of the selected travel plan.		

<b>Subject Code: SOCIAL</b>	<b>Category Code: 1303</b>
<b>Letter #:</b> 294	I would also urge the L&C Forest to consider confiscation of machines as punishment for folks who violate closures. This has been done on the FNF with some effect.
<b>Response:</b>	These are decisions that the law enforcement officer can make as he deems appropriate for the situation on a case by case basis.

<b>Subject Code: SOCIAL</b>	<b>Category Code: 1303</b>
<b>Letter #:</b> 111	The problem I see here is there is no one to police this area. Last year there were ATV tracks all over so my father had to call t he forest service to tell them.
145	If the trail system is to survive as defined by the travel plan, increased education and enforcement of regulations is required, particularly on weekends and holidays.
175	The facts clearly show that the Forest Service cannot perform its enforcement duty to the public in managing these resources without greater funding, manpower and the will to enforce
177	motorized travelers that say they don't have enough trails to ride and that they don't ride off-road. We all know they do and the Forest Service doesn't have enough funds or personnel to keep them from it.
282	Under any alternative, this decision has the potential to affect over five hundred thousand acres of public land in the analysis area. Notably, nowhere in the DEIS does the USFS assess the direct, indirect, or cumulative impacts of this significant decision or discuss how it will be monitored and enforced. The DEIS fails to address the issue of how vehicle use will be effectively enforced and monitored with the large network of roads and motorized trails proposed in the alternative. When coupled with a declining and inadequate enforcement budget, enforcement has to be factored into any decision about travel planning. The DEIS does note that motorized vehicle use will be easier to enforce with large blocks of quiet trails.
286	I particularly urge the travel plan to feature comments about commitment of the Agency to enforcement of what ever plan is adopted. The plan should include a clear statement that past violations by off road users are a major factor in the controversy surrounding the current plan and a clear warning that a recurrence of those violations will cause the Agency to close areas where such abuse occurs.
363	For the entire Jefferson Division there is one law enforcement officer. That is an abomination. The only way to have any proper enforcement is to designate large blocks.
372	Enforcement of existing laws should remain a high priority.
396	What I would like to see is more policing of existing trails, there is room for everyone.
428	I see a failure of enforcement of the existing laws concerning ATV and snowmobile use. Illegal activities have been on the increase the last few years and nothing seems to be done about it.
545	I feel the best thing the FS can do is to enforce a travel plan.
576	Is there a lot more money going to be spent to patrol these areas when we already have a problem in the State as a whole with not enough State or Federal law enforcement personnel to cover such expansive territories found here in Montana? The point here is, there are not enough law enforcement personnel in place to cover populated areas in this State, let alone to be found in areas more remote to protect the naturalness of the wilderness.
616	I am concerned with a new road that comes down Arch to the river and then stops. There is no law enforcement ever in this area. I know the public well enough to know that they will not come all the way down off the hill and then park. This is a very expensive road to nowhere. They will vandalize any gate here just as they did with split rock
621	Law Enforcement- The DEIS acknowledges that there is only one law enforcement officer to patrol over 1.1 million acres. Yet the DEIS fails to mention law enforcement
625	More enforcement personnel may be the most important cog to more satisfactory multiple public use of forests.
635	The DEIS fails provide for law enforcement and monitoring. The travel plan fails without such enforcement. History already shows that left unchecked, ORV's go anywhere they can and will pioneer trails to places that are not open to ORV use. Saying that the off trail areas are closed to OR V's is not enough, Only adequate enforcement will suffice, and it is arbitrary and capricious to fail to include a plan in the DEIS.
646	As you well know closure is not that answer, it locks honest folks out of things, education, and enforcement will do more for all.

672	The biggest problem this forest has is its ability to enforce travel plan restrictions. Any more restrictions will only add to the governments in ability to patrol the forest. The biggest conflict with forest use is either between users, courtesy practices, vandalism, and disregard for forest policy. The forest needs more law enforcers to try to mitigate these problems
688	Law Enforcement - Motorized vehicle use will be easier to enforce with large blocks of quiet trails.

**Summarized Comment:** There needs to be more law enforcement and public education than presently available to enforce the new travel plan. Many believe that having more large blocks of non-motorized land will make enforcement easier. One suggests that restricting more land to motorized use simply increases the burden on the agency to enforce the new restrictions. There is the desire by some to have the FEIS discuss how law enforcement and monitoring will be handled, since it is a key part of the success of the new travel plan.

**Response:** The implementation of a travel plan is accomplished by a great number of administrative actions. The Lewis and Clark National Forest will be using this full range of actions. They may include, but are not limited to:

- Requesting additional funding in future years.
- Training additional staff to help with law enforcement as a co-lateral duty.
- Changing the work schedules of field going staff to increase the number of Forest Service employees present in the field on the weekends.
- Education and outreach programs to people visiting the Forest.
- Partnering with individuals and groups to increase visitor contacts in the field.
- Partnering with individuals and groups to produce and distribute information and user friendly maps that make obeying the travel plan easier.

Here are some more specifics. The issue of not having enough law enforcement officials on the forest is a problem the Forest Service needs to correct despite shrinking budgets and limited resources. We fully agree that there is a problem with uncontrolled OHV use creating trails and resource damage. Public comments and field observations have made that abundantly clear. Currently the Lewis and Clark NF has only two law enforcement officers(LEO's) covering almost 1.9 million acres spread over seven separate mountain rangers. (See the Law Enforcement issue analysis on p. 48 of the DEIS). To try and help with this issue, the USDA Forest Service is considering more funding of Law Enforcement & Investigations to provide the Forests with more field LEO's. The East Zone Law Enforcement Unit, which encompasses the Lewis & Clark NF is proposing if budgets allow to add another full time LEO stationed out of Lewistown to help with the East side of the Jefferson Division . We currently have not filled behind a Special Agent position that is now vacant in Great Falls. Both Positions could help greatly with supplying a stronger field presence and investigation of illegal activities on the Lewis & Clark NF. The LCNF is also considering opening district offices on weekends and shifting employee hours to include Saturday and Sunday's, and to require FS employees to wear uniforms when out in the field. This would greatly enhance the field presence of FS employees. The LCNF is also working on grant agreements with the State of Montana to have extra funding for ATV, motorbike, and snowmobile rangers / forest protection officers. Additionally, the Forest Protection Officer program needs to have more coordination and emphasis on their key role in law enforcement, with more expectations of what they will do, and better funding to accomplish this. A key aspect of the issue of lack of law enforcement is public education. We need to do a better job at public education. The Forest is currently involved in a partnership to provide bulletin boards and travel plan information at key portals and trailheads. We will be producing better, easier to read maps that will make law enforcement easier and public understanding better. We need to encourage the public to report violators, including the information we need to prosecute violators. It is the public's national forest, and they bear a responsibility to help enforce the Forest Service enforce the new travel plan. Even more so, every recreating member of the public needs to abide by the new travel plan regulations. Monitoring of the travel plan will likely be discussed in the Record of Decision, and will likely emphasize key resource concerns, such as elk security and sediment to streams. If the forest determines through monitoring that there are problem areas where violations of the travel plan are occurring, we are prepared to close to motorized use those areas with violations causing resource

damage or otherwise violating the travel plan. This enables us to hold to the resource analysis effects contained in this analysis. Law enforcement will also be addressed in the Record of Decision. We believe this combination of monitoring, law enforcement, and public education will enable the forest to adequately provide protection and safety for the visitors and also the resource. The comment that large blocks of non-motorized land makes law enforcement easier is only partially true. Obviously large blocks of non-motorized land make motorized use within it more risky because of larger distances from trails that allow motorized use. There is a higher likelihood of getting caught. However, more restrictions on motorized use can also create a backlash if it is not perceived as fair and equitable across the forest. This backlash could result in more willingness to violate the travel plan, and greater law enforcement problems. Balanced opportunities for all recreationists, education, Forest Service law enforcement, and the public's willingness to abide by the new travel plan and report violators are all part of the solution of having adequate compliance.

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1303</b>
<b>Letter #:</b> 134	I was surprised to hear the statement that airstrips will lead to illegal hunting or poaching. I don't believe this statement, and believe that the presence or possibility of aircraft visiting the area will allow for enforcement and tips of illegal hunting or poaching that may or may not be occurring. Most plane owners are also sportsmen, and would not even think of jeopardizing the loss of ownership of an aircraft or their hunting privileges.	
D-52	The notion that the existence of airstrips will promote illegal activity is nonsense. Most pilots have way too much at stake to risk anything of the sort	
360	allegation that aerial game violations would increase if airstrips are established in the Little Belts.	
<b>Summarized Comment:</b> The idea that illegal hunting or poaching could increase with new airstrips is disagreed with.		
<b>Response:</b> We agree that most plane owners are also sportsmen, and would not want to jeopardize the loss of ownership of an aircraft or their hunting privileges. However, aircraft strips in the middle of unroaded areas would be extremely difficult locations in which to enforce game and travel plan regulations. It is these airstrips where illegal use of aircraft as a livery service delivering and picking up hunters, as well as using aircraft to spot game, could occur, with little risk to the aircraft owner.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 5	The document fails to do adequate analysis and disclosure of existing conflict that would indicate a need to close areas to motorized users. It fails to disclose what, if any, conflicts exist and then pose a direct nexus to the decision to close. It fails to provide any opportunity to mitigate such conflict, or importantly, that much of the conflict is perceived, not actual or documented, and the opportunity for "conflict free" recreational opportunities are number and extensive.	
<b>Response:</b> A reduction of motorized trail mileages was often the result of resource impacts determined by resource specialists on a trail by trail or area-specific basis as they implement the forest plan requirements. In so doing they used their best judgments and existing scientific studies. Social conflict public comments we received were typically general in nature, rather than trail specific. There is a definite perception that too many trails are open to motorized use, and that there are not enough "quiet areas" in which the public can go to and enjoy the forest without the sounds and sight of motorized users. There were many who disliked being with motorized users. Read the subjects codes for Social and for Recreation to get a better feel for this feeling of conflict with the existing situation. Additionally, a national public survey of 11,000 respondents documented on p. 107 of the DEIS shows that the third most important site attribute for non-winter season dispersed sites (ie. trail dominated areas away from roads) is "separation of motorized and non-motorized uses." Only "naturalness of setting" and "presence and evidence of wildlife" were ranked higher. There is obviously a significant conflict between some motorized and non-motorized users. Additionally, the 3 State OHV EIS requires that we not allow OHV use off of existing roads and trails. We have no choice in that matter.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 17	Hearing comments from the motorized community that they don't ever see hikers or other non-motorized users such as mountain bikers does not mean these recreationists aren't interested in those areas, it just means that someone who is seeking more quiet and solitude avoids these busy, noisy areas. And on those busier roads and trails, the FS must address possible user conflict and plan accordingly how to help alleviate these conflicts.	
<b>Response:</b> We agree with your point that simply because motorized users don't see non-motorized users is really no proof at all that non-motorized users aren't interested in the area. We recognize that motorized use on a trail, if significant, can cause some non-motorized users to look for quiet places elsewhere on the forest. The Forest has looked at each trail and road specifically to determine whether resource conflicts, including social conflicts, are a problem.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 38	Social Conflicts and/or use conflicts are being vastly overstated by non-motorized recreationists and the Wilderness advocacy groups for self serving reasons. The DEIS to document actual instances of conflict but makes a general statement that conflicts occur. Manufacturing conflicts or promoting a perception of conflicts has been an effective strategy to help MWA in their quest for more non-motorized areas. There aren't enough trails to have separate, high-quality trail systems for every different type of use. Intolerance of other recreationists on public land an manufactured "conflict should not be rewarded.	
256	I have tried to hike some of the Little Belt level trails and roads on the weekends; however, I have been forced to leave because of the engine noise and dust created by motorized vehicles.	
281	For many years I enjoyed the peace the forest offered. No more, might as well stay home. ATVs, motor bikes etc don't make for a very quiet environment. OH for the good old days when camping out was a true recreation. Now with all the now toys people think they are being picked on if they can't play with their toys where they please.	
282	The evidence that off-road vehicle traffic conflicts with other uses is overwhelming. The 1994 Montana Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. According to the DEIS, 47% of the forest users in the Lewis and Clark National Forest are hikers while only 5.3% use off highway vehicles. Increasingly hikers and horseback riders are displaced as motorized vehicle use becomes better established.	
284	Social issues are not a valid reason for closure when the Jefferson Division has historically been motorized use and areas within Lewis and Clark Forest offer different uses.	
431	In the early 1980s, I began to encounter a few elderly gentlemen carefully and slowly riding small trail bikes, In the late 1980s, I began meeting up with more trail bike riders. From that time to this time, the number of trail bike riders, and the size of their machines, increased and continues to increase exponentially. The latest trend with trail bike riders, starting only a few years ago, is to ride in body armor, which allows them to operate recklessly, everywhere. It is now virtually impossible to go anywhere in these mountains without meeting lots of riders wearing body armor on big machines, most of whom are polite enough, but some of whom are going too fast, not paying attention to anyone other than themselves, operating recklessly, and endangering others. You have heard the ignorant and belligerent comments of motorized users at your meetings and you should be able to understand why a reasonable person would not be comfortable about walking the same trails they are riding, or setting a tent in any meadow they may decide to ride in for thrills. Some separation of users is required to avoid conflict, and regulations are required, even if they will not always be obeyed, to establish the climate of what speeds and other behaviors are acceptable.	
635	There are places where I do not like to hike or ski any longer because of ORV's and snowmobiles. Hiking and skiing by themselves do not displace or cause conflicts with motorized recreationist, it is the always the other way around. It is frustrating to hike for hours in order to experience the solitude of back country only to have the wildness interrupted and replaced with the street noise of town. At the open of the upland game bird season this year, my	

	wife and I hike in the Jefferson Division and were run off the trail by 4 wheel drive vehicles cruising the ridges, looking for birds. ORV's never yield to hikers, it is always the other way around. If you do not get off the quickly enough, you are a target for a speeding snowmobile or motorcycle.
642	Our last family camping trip was ruined by a gang of constant motorbikes.
<b>Summarized Comment:</b> Many respondents are unhappy with the impacts motorized recreation has had on them, and feel that it is growing. One respondent feels this unhappiness is manufactured by non-motorized interest groups and is not true.	
<b>Response:</b> The discussion regarding social conflict was brought forward by the IDT Social Scientist, not by non-motorized or wilderness advocacy groups. Sources were cited for this conflict: review of scoping comments for this DEIS, participation in numerous conversations with IDT members, presentations to the IDT (4/3/2006), review of articles published in the Great Falls Tribune. In addition, the IDT Social Scientist participated in the National OHV Collaboration Workshop and researched and authored two case studies applicable to the study area. This is documented in: <a href="http://www.fs.fed.us/recreation/programs/ohv">www.fs.fed.us/recreation/programs/ohv</a> .	
Public comments solicited by the Forest Service for the travel plan analysis resulted in a number of comments documenting concerns about conflicts with motorized users. Motorized users appear to generally be tolerant of non-motorized users, but the reverse is certainly not true.	
The DEIS documents research on conflicts on pp. 106-107 and provides a desired future condition on pp. 107.	

<b>Subject Code:</b> SOCIAL		<b>Category Code:</b> 1304
<b>Letter #:</b> 9	The conflict between users is being caused by the agency and its disregard for the need of clear signage. A standardized multiple use sign for these areas must be posed to clearly inform people of the uses allowed in these areas. This corrective action would stop many complaints that the FS receives on user conflict.	
<b>Response:</b> Signage can certainly be confusing, especially if it is not read carefully; has been removed by vandals; or has gotten so old it is not legible. There is a need to develop clear signing as we implement the selected travel plan. That is something that will be done outside the NEPA analysis, and is not part of this analysis. There are national signing standards that we will adhere to as new signing is installed. For the future, the minimum level of signing needed is to identify on the ground existing roads and trails. That, in combination with the Motorized Vehicle Users Map, will be the minimum. We anticipate doing more than that, but the decision of how to do it has not yet been completely answered.		

<b>Subject Code:</b> SOCIAL		<b>Category Code:</b> 1304
<b>Letter #:</b> 27	Smith use of ATV's in the river corridor, through the streambed, over stream banks, and at or through designated camp areas is becoming more frequent and resource damage and user group conflict is resulting. Private access to gain exclusive access to USFS and state lands, which is reducing FWP ability to manage social conflict, fisheries and wildlife management needs to be managed through restrictive PHV use in the corridor.	
383	Access to the Smith might be a mute issue as the time for motorized access would be mid-July to the end of August and that time frame is after the river is floatable. There would be no conflict with camp users along the river. Generally the motorized users would be in and out in a day. The horse people/hikers would take longer for travel and normally stay a little longer. It might just mean having a shared use based on time frame during that period.	
<b>Summarized Comment:</b> One commentator feels the Smith River is being impacted by ATV's in and adjacent the river, itself, resulting in user conflict and resource damage. The implication here is that it is OHV use from adjacent private landowners with exclusive access to national forest land. Another commentator feels there is no or minimal conflict between motorized and non-motorized users on the Smith during mid-July to August because it is after the river is floatable. Some shared use of river campsites would be okay.		

**Response:** Alternative 4 would eliminate motorized access from the east. Alternative 5 would reduce motorized access to two locations, or by more than half from the existing situation. OHV use on Anderson private property will not be affected, but roads or trails down to the Smith on National Forest will be, depending on the selected alternative. It is likely motorized access to the river will be significantly reduced, minimizing problems described with ATV's in and around the river, itself. It is agreed that allowing motorized access in July and August would have minimal impacts on Smith River floaters, the majority of who float not later than June.

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 278	Under the discussion of the Holiday Camp Trail Head there is concern raised about conflict with other recreationists by the support vehicles for aircrafts occupying sites at the trailhead. Recreational pilots don't have fuel trucks and trails full off great following them around. In the discussion of the Russian Flat area, "Their expectations of natural landscapes, including the park in which the airstrip is to be located, would be affected." Doesn't the gravel road or the campground affect the landscape?	
<b>Response:</b> It is people's expectations on what they expect to see at a recreation facility that may affect their perceptions of conflict. A typical trailhead on the forest, such as Holiday Camp, does not have aircraft sharing the facility, but does have an access road. A road here or at Russian Flat affects the landscape, but is an expected part of the landscape, unlike airstrips and aircraft. Pp. 107 describes research that suggests conflict can occur when groups meet that are perceived as having different goals, values, or skill levels. Although the comment indicates there would be no support vehicles for the aircraft, the presence of aircraft by themselves would likely result in conflict with those trailhead users not expecting aircraft use, or supportive of aircraft use immediately adjacent the wilderness study area adjacent Holiday Camp Trailhead.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 598	The answer to protecting the forests and avoiding user conflicts is more riding opportunities - not less, as is proposed. I Please work closely with the local clubs, such as the Meagher County Little Belters. Work with local snowmobilers and A TV ers to build a system that has easy, intermediate, and challenging riding areas. I sometimes ride with my grandchildren and just want to putt through the forest looking for wildlife. Other times I want to zoom along deserted forest roads or go rock climbing. In a forest like Lewis & Clark, all of these opportunities should be available. Please talk to local users and see that all of these things are included in the forest travel plan.	
599	To see a good example of how a community came together to develop a great trail system, visit the Moose Walk-Red Dot Trails in Finland and Silver Bay, Minnesota. These trails wind through beautiful hills, maple forests, and across sturdy bridges over rivers. The trail connections two small towns about 50 miles apart, with numerous loops. The scenic overlooks are awesome. And best of all, there is little or no conflicts between local residents, riders, or other forest users.	
<b>Summarized Comment:</b> Provide a variety of different skill level trails for OHV's by working closely with existing clubs, and provide more, not less motorized trails. There is a good example of an OHV trail system in Minnesota, with little or no conflicts.		
<b>Response:</b> There is no question of the importance of working with local OHV and other clubs when designing trail systems. We have done that and will continue to do that, but there is a limit of what we can agree upon when it comes to OHV use opportunities. The OHV community, some mountain bikers, and the Backcountry Horsemen were heavily involved in the development of Alterenative 3. Similarly, a non-motorized group was heavily involved in the development of Alternative 4. We are required to meet Forest Plan standards, which affect a variety of resources. We are also required to minimize user conflicts where they appear significant. There have been numerous public comments complaining about the amount of motorized trails available, compared with a very limited number of non-motorized trail, in the existing condition. We feel the selected alternative will provide a balance between the motorized and non-motorized recreating public. We		

are unable to assess the success or not of the Minnesota trail system, but do agree that well-planned trail systems can minimize conflicts, especially if there is a separation of uses and a variety of motorized and non-motorized settings.

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 264	Alternative 5 will help keep recreationists from making additional roads and trails but will not do the same to permit tees and contractors That is why I am asking you to make permittees and contractors subject to this travel management plan	
<b>Response:</b> The 3 State Off-Highway Vehicle EIS was an interagency analysis between the BLM and Forest Service. It specifically exceptions from the decision on p. 4 of the Record of Decision “motorized wheeled cross-country travel for lessees and permittees” when they are administering their federal lease or permit. This decision will not be revisited. Contractors working for such lessees and permittees, if doing work for them to help administer their permits or leases, would fall under this same exclusion. If, however, the lessee or permittee was causing resource damage by motorized vehicle use, he/she could lose the opportunity to use such vehicles under terms of the permit. Contractors working for the Forest Service would typically need to meet the requirements of the selected travel plan alternative, unless the agency agreed that some off-road or off-trail use of motorized vehicles was necessary to construct a project.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 176	Closing motorized trails (especially in the Deep Creek Area) creates an outfitters paradise at the expense of the regular guy	
<b>Response:</b> Effects on outfitter guides are described on pp. 93-95 of the DEIS. Proposed alternatives vary in Deep Creek, providing a wide range of motorized and non-motorized options.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 525	closures, in Helena, Gallatin Beaverhead-Deer Lodge National Forests. Forced residents. These other closures have not been factored in. Large closures most certainly will concentrate use on other trails and more conflict between users is a big possibility.	
<b>Response:</b> See the 1300 section above for a discussion about potential effects of concentrating motorized use onto smaller areas. See pp. 84-93 for a discussion about the cumulative effects of existing and anticipated reductions in motorized trail riding opportunities on other forests.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 556	The problem comes when the FS does not properly -sign the trails. When a picture of a motorcycle, A TV and snowmobile are shown at the trailhead with a circle and red strike through them, it portrays to the non-motorized user that this trail is closed to motorized users. Many people do not notice the dates that are associated with the sign showing when the motorized closure applies. The conflict between users is being caused by the agency and its disregard for the need of clear signage.	
577	When a picture of a motorcycle, ATV and snowmobile are shown at the trailhead with a Circle and red strike through them, it portrays to the non-motorized user that this trail is closed to motorized users. Many people do notice the dates that are associated with the sign showing when the motorized-closure-applies. The conflict between users is being caused by the agency and its disregard-for-the need of clear signage.	
<b>Summarized Comment:</b> Forest Service signs for travel management are confusing. People don’t notice the dates on them, and conflict results because people don’t understand them.		
<b>Response:</b> We agree that existing signs can be confusing, especially if they are in need of replacement and decals have become worn. Not reading them carefully can also be a problem. Implementing the new Travel Plan will require clear signage. There are national sign standards that will help us provide this.		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 282	<p>Safety issues are a major concern for foot and horse users during the summer and winter months. Motorized vehicles can frighten horses and pack animals, and it is a safety concern when encounters occur in treacherous stretches of the trail. The U.S. Consumer Product Safety Commission estimates each year about 110 snowmobilers are killed, about 40 percent in collisions. Snowmobiles are linked to about 13,400 emergency room visits each year." Safety is yet another reason why it is poor public policy to force skiers to "share trails" with high-speed machines. Along with safety comes liability</p> <p>As public policy, and a solution to travel management, the demand that people on foot and horse "share the trails" with machines falls flat. Given the option, forest recreationists-in overwhelming numbers- seek quiet non-motorized trails. The 1994 " Montana Trail User Study" found that 84% of state equestrians and 89% of Montana hikers feel ORVs are "incompatible" uses. A motorized dirt bike can cover in an hour what it takes a hiker or horseman the better part of a day. The Jefferson Division is central to four of Montana's seven major population centers - Billings, Bozeman, Helena, and Great Falls. Many folk in these centers would like close access to large blocks of motor-free public land.</p>	
<p><b>Response:</b> Safety is a criteria described on p. 350 and 351 of the DEIS. Safety was considered when analyzing both winter and non-winter trails, as well as proposals to mix traffic on some roads. We recognize that OHV's may scare stock under certain circumstances, but sharing of trails by both motorized and non-motorized users is not inherently unsafe, and consideration of the needs of others using the same trail is practiced, we believe, by most users. Skiers have groomed ski opportunities at Silvercrest , and can also use other nongroomed trail systems that are closed to snowmobiles. Winter alternative 3 offers cross-country skiing in addition to Silvercrest, to its south, and along Jefferson Creek.</p>		

<b>Subject Code: SOCIAL</b>		<b>Category Code: 1304</b>
<b>Letter #:</b> 645	<p>Tents: The public is only allowed to have a tent in the area for two (2) weeks at the time. Deep Creek Park Outfitters, on the other hand, has been given permission for a year-around tent structure. Wheeled Access: The public is only allowed to use wheeled vehicles that have a wheelbase of less than fifty inches in width. The Deep Creek Park Outfitters, on the other hand, have been allowed to use a full-size rubber wheeled wagon to chauffeur their high paying guests around the Deep Creek Park area. ATV vs. Grazing: The public is no longer allowed to use ATV's on Trail 311. The Forest Service states that this is in part because the area's vegetation is in from ATV access. Upon your first vist to the area, however, it is evident that improper grazing of domestic cattle owned by the are outfitters has done more damage to Deep Creek Park than motorized access. ...The neighboring ranch, the Anderson Ranch, runs from the west end of Deep Creek Park to the east end where there is the only existing spring water in the park. Mr. Anderson has all the grazing permits for the park area as well as far all the commercial use of the park by his business, Deep Creek Outfitters. Mr. Anderson also has a permit to use a wood based wall tent in the area year around. Mr. Anderson also is permitted to use horses to pull a large wagon all around the park, which leaves big tire tracks throughout the park. On the south side of Trail 311 in the park, Mr. Anderson is able to drive motorized vehicles the full length of the park. If the public were denied access to the northside of the fence on Trail 311, then the Forest Service would virtually cut off park access. This would cause great harm to the public and would give the outfitter a great economic windfall.</p>	
<p><b>Response:</b> Deep Creek Outfitters is allowed in their current 5 year term priority use permit to have a fully erected tent up during the outfitter's operating season, but only the poles are allowed to remain during the non-operating season. The current permit also allows a wagon as a permitted activity on an established single-track trail to access his spike camp via the Parker Ridge trail. The Forest Service is working with the outfitter currently to eliminate wagon use as part of the permit. Claims of wagon ruts across the national Forest portion of the park are difficult to verify because of the many cattle paths in the area. We have shared your concern on livestock impacts with the range scientist on the district. Public access to the park on Trail 311 has been assured since its reconstruction and relocation several years ago. The selected alternative will determined whether motorized trail access by the public will continue and, if so, what kinds of OHV's are allowed in the area.</p>		

## SOILS COMMENTS/RESPONSES

<i>Subject Code: SOILS</i>	<i>Category Code: 1400 – Sensitive Soils</i>
<b>Letter #:</b> 15	The Forest Service’s analysis of impacts to soils begins on page 162 of the DEIS. It is clear from this narrative that there will be substantial impacts to soils from designation of OHV routes, but these impacts are not documented.
<b>Response:</b> Examples of soil impacts from motorcycle, ATV and 4X4 vehicles were provided in letters for areas including Big Baldy, Oti Park, Haymaker and Bluff Mountain. Additional examples of documented soil impacts from Forest files will be provided in the FEIS.	

<i>Subject Code: SOILS</i>	<i>Category Code: 1400 – Sensitive Soils</i>
<b>Letter #:</b> 27	In Deadman Creek, the proposed ATV loops will be in areas with unstable soil types. ATV use in this area will lead to increased sedimentation into the Sheep Creek Drainage, which already had water quality problems.
612	Map 8 shows a scattered pattern of sensitive soils southwest of the Trask Ranch, which seems to indicate invasive activities should be minimized and or mitigated. Map 13 shows trails with over 15% slopes along the South Fork of the Judith River above Bluff Mountain Creek. Introducing more motorized or intensive grazing into this area of sensitive soils is not resource protection.
<b>Summarized Comment:</b> Several comments were received indicating concerns with soil impacts of proposed routes based on sensitive soils and steep topography.	
<b>Response:</b> Final stable locations of proposed routes will be determined with additional site specific NEPA efforts. The additional projects and NEPA will be initiated when funding and resources are available.	

<i>Subject Code: SOILS</i>	<i>Category Code: 1400 – Sensitive Soils</i>
<b>Letter #:</b> 33	The USFS must also, but is failing to protect the primitive character of the Big Baldy Roadless Area. Currently, however, all of the trails in the area are open to either dirt bikes or ATVs and it shows. Motorized dirt bikes are even driven off trail in this area and creating new “trails.” Soil erosion is evident on Trail 416 leading to the summit of Baldy from the south. These dirt bikes routinely drive all over the open, high alpine grass. This pristine area is quickly becoming a motorized playground with increasing more hillsides scattered by dirt bikes.
161	Motorized users have repeatedly shown they have no respect for either other users or for natural resources. I refer particularly to the Haymaker area of the Little Belts. Motorized users have made innumerable new “trails”, especially motorcycle routes up steep hills. This creates tremendous erosion problems.
282	Oti Park-Damage from vehicle use is evident in Oti Park. With soils which easily erode, this area is inappropriate for off-road vehicle use.
490	The erosion to the trail is horrible
531	Seasonal changes in the Deep Creek area will force riders to go to higher, wetter areas to trail ride in June, which will result in increased damage to wetter trails in those areas.
542	The Smith River is a special experience and having ATVs driving up to the river would take away from the experience. There would be nothing stopping the drivers of these ever more technologically advanced machine from driving right over the banks and into the water. This would result in bank erosion and would harm the famous fishing opportunities.
612	Map 16 shows the South Fork of the Judith River riparian areas at risk from use of wheeled vehicles. Increased use here seems inappropriate. The area just downstream of the confluence of Cabin Creek is full of wetlands and bolder fields making ATV and extensive hoofed animal use destructive of banks and vegetation. The route as it now exists is barely passable.
<b>Summarized Comment:</b> A number of comments were received describing concerns to soils from unauthorized off road travel, from travel when conditions are wet and from use of routes that were not properly designed for the class of vehicle or level of use.	
<b>Response:</b> Direct and indirect impacts to soils from both authorized and unauthorized travel are described on pages 172 through 180 of the DEIS. Routes lacking an engineering design, use of routes	

when wet, the continuing impacts to soils from established routes, use of routes by a class of vehicles not considered when the routes were designed or at levels not considered when the routes were designed, sensitive soils, long, continuous steep routes and the low levels of maintenance are important factors considered when describing soil impacts. These factors are considered in the FEIS and reflected in the preferred Alternative.

<b>Subject Code: SOILS</b>		<b>Category Code: 1400 –Sensitive Soils</b>
<b>Letter #:</b> 635	ORV's cause damage to trails that harms resources and the hiking experience. ORV users do not like switchbacks. The like straighter routes and when their tires grind through the dirt they kick up rocks and more rocks. Loose rocks on long grades may be no problem for ORV's but it is a problem for hikers. The DEIS talks about erosion caused by ORV's and hikers and tries to balance erosive effects from both. This is absurd. The analysis does not take into account the above fact that ORV's go straight up and down hills wherever they can. This configuration causes erosion and sedimentation. There is no substantive analysis of the effects of this type of trail configuration.	
<b>Response:</b> Published studies of the soil impacts of different classes of users are presented on page 173 the DEIS (Dale and Weaver 1974; Weaver and Dale 1978; Seney 1994). These studies were based on authorized use and describe how researchers found on meadow trails that motorcycle damage was greatest when traffic was upslope while horse and foot traffic was most damaging when the traffic was downhill. Soil impacts of unauthorized off road travel were not included in these studies. Unauthorized off road travel is not supported by the Forest Service. Soil impacts from unauthorized ATV trails are described on the bottom of page 173 (Meyer 2002) and page 174.		

**TRANSPORTATION COMMENTS/RESPONSES**

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 42	We encourage the FS to incorporate as much road rehabilitation and road closure and decommissioning as possible in its preferred alternative. We believe efforts to improve road conditions and reduce sediment delivery from roads should be an important element of the Travel Plan.	
<b>Response:</b> Road rehabilitation is a concern throughout all the alternatives. As funding becomes available, roads with safety and environmental issues will be corrected. Road closures and decommissioning are a big part of addressing an efficient, environmentally friendly, maintainable transportation system. Numerous user-created roads, as well as, ineffective system roads have been addressed for deletion from the current transportation system by varying methods of closure. The final on-the-ground methods will be completed on a project-by-project basis and as funds become available.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 8	Motorized trail systems should be developed using timber sale roads and trails. Existing timber sale roads and trails should be inter-connected by construction of new trail segments or rehabilitation of existing trail segments to provide mitigation for lost motorized recreation opportunities. Connector trails should be constructed to avoid dead-end trails. These systems could provide recreation opportunities for a variety of skill levels and visitors. We suggest that travel management signs be made easier to understand and standardized. Signs are the backbone of good management program. The county has records that show the routes were there prior to the establishment of the 1976 NFMA and FLPMA and , are therefore, valid RS 2477 routes. It is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. We request that this planning project include adequate research of the country records and adequate formal consultation and coordination with the country to get their input on RS 277 routes. The proposed action must include these designations in order to provide a network of OHV	

routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan.

We request the creation of a new trail segment to connect the trail opportunities, short connector from road 3412 (O'Brien Park) to the highway, junction with road 267. We request a fair evaluation of the trail proposed in Alternative 3 in the O'Brien Creek drainage, taking into consideration that a collaborative group could adopt, secure funding for bridges and maintain the trail for multiple users, motorized and non motorized, summer and winter. We request that motorized trails noted as U753 and U351 in the Mizpah/ Porphrey area be kept open. We request that ATV use on snowmobile trail H 6407 from Divide Road 839 to Island Park Road 204 be allowed. We request that the Higgins Park road be left open to mixed traffic. We request that the road proposed in Alternative 5 from the South Fork road to lower Eitten Ridge Road 821 should be included in the final decision and give priority for safety and water quality concerns. We request that trail 2011 and 6421, north of Russian Flats be used as a connection because there is an old road that already exists. We request that trail 6420 to the South Fork Road or road 6419 be extended. We request that the proposed reroute via Arch Coulee to the Middle Fork Ranch should be open for public use.

Selected roads that should be left open to mixed traffic for general big game hunting access: Side roads off Eitten Ridge road 821. Eitten Springs Road 6536. Rickard Coulee spur road off main road. Road 8863 up Hay Canyon. Burnt Ridge road 6399/6398. Road 3309A off Bear Park Road.

Handicapped Issues: We request a road/trail code, on the map, for handicapped access points in the forests. We request that forest maps should show the access points and whether they are locked or not locked.

We request that handicapped access should be authorized at all ranger station and the office in Great Falls. Keys should be available for all ranger districts at all of these locations. We request the creation of more opportunities for the handicapped. The current Alternatives do not adequately address handicapped access needs.

We have noticed that most trails in wilderness areas are adequately maintained with clearing, water bar construction and trail rerouting provided on an annual basis. All of this is done by agencies without any user-generated fees. At the same time motorized resources see very little maintenance and motorized recreationists have had to do a lot of work themselves in order to keep motorized routes open even though OHV gas tax has generated over 8 billion dollars over the past 30 years. Moreover, to top off this incredibly inequitable situation, lack of maintenance is often used as a reason to close motorized recreational resources.

**Response:** Some people claim there are public rights to motorized access on existing old roads and wheel tracks under RS-2477. Section 8 of the Act of July 26, 1866, (R.S. 2477) provided: "The right of way for the construction of highways over public lands, not reserved for public uses, is hereby granted." Although this statute 43U.S.C. 932 (R.S. 2477) was repealed by Title VII of the Federal Land Policy and Management Act of October 21, 1976, many rights-of-way for public highways obtained under the statute exist or may exist on lands administered by the Forest Service. The Forest Service has had a moratorium against processing any R.S. 2477 assertions since September 25, 1997. Section 108 of the Department of Interior and Related Agencies Appropriation Act, 1997, restricts RS 2477 rules and regulations from becoming effective without an authorizing Act of Congress. Congress has not passed such an authorizing Act to date. Therefore, the Forest Service is not currently researching RS 2477 claims.

The only entities that can claim RS-2477 rights are public road management agencies, such as Federal, State, County, or City road departments. Private citizens and private organizations do not have authority to claim RS-2477 rights, because they do not have the authority to manage a road for public use. The Lewis and Clark National Forest has not received any RS 2477 assertions from a public road management agency.

An extensive analysis of the entire Forest system roads were reviewed for mixed-use potential. The prime criterion was providing "family friendly" OHV loop opportunities. Over 100 roads were identified as possible candidates and only 11 roads were eliminated due to concerns with the safety of mixing vehicle types on the same roadway.

The Ettien Ridge Rd. 821 is being converted to a 4x4 motorized trail from Holiday Camp Trailhead at M.P. 2.273 to its terminus with the Judith Station Rd. 822. The 4x4 motorized trail will be open yearlong less seasonal restrictions from M.P. 7.688 to the junction with the Judith Station Rd. 822.

All side roads off the Ettien Ridge road will be decommissioned less 2 roads which will have yearlong closures (Ettien Ridge No.3 Rd. 6534 and Ettien Ridge No.1 Rd. 6545).

The Ettien Ridge No.4 Rd. 6536 will be decommissioned.

The Richard Coulee Rd. 2079 will be closed yearlong to motorized vehicle travel within the FS jurisdiction (M.P. 0.493 to end at M.P. 2.7).

The Hay Coulee Rd. 8863 traverses south from Sage Cr. Rd. 265 and will be decommissioned.

The Burnt Ridge Rd.6398 – M.P. 0.000 to 1.045 is being decommissioned. M.P. 1.045 to ending at M.P. 3.366 is being closed yearlong to all motorized traffic.

Rd. 6399 – M.P. 0.000 to 0.723 will remain open to all motorized traffic. M.P. 0.723 to junction with Rd. 6398 is being closed yearlong to motorized traffic.

East Fork Bear Gulch Rd. 3309-A will be a seasonally restricted road.

Adding specific map coding for handicap access would add to an already busy map the inability to easily read the map. A general note on the map directing users to contact District offices on inquires of handicap access could be added. All forest developed sites are required to be ADA compliant. A few of the older sites may not currently be in compliance because of lower priority and funding. Presently there is a hunter access program that is offered at the discretion of each Forest District Ranger. Also there are a few handicap trailheads and other amenities throughout the Forest. The current mapping protocol is to show gates on restricted roads. Most developed sites have controlled access with seasonal locked gates. Again, forest users can contact the District offices to find out their status.

Handicap opportunities are paramount and continuous in our decision making on improvements throughout the Forest. As funds become available, the Forest actively looks for opportunities to create access for the physically challenged population.

To address the statement of inequitable funding between wilderness and motorized OHV trails, wilderness trails are maintained both by appropriated funds and volunteer organizations. The volunteer program is a vital part of the trails program. Without the volunteers, the present wilderness trail system maintenance would decline.

Gas taxes do not directly fund Forest trail systems. Grants from different organizations must be approved to help fund trail projects.

In regard to closing non-maintained trails, it is sometimes correct that the trail will be removed from the system. This usually takes place when serious environmental damage is occurring and there is no foreseeable funding to correct the problem. On high-use routes corrective actions usually take place to fix the situation.

<b>Subject Code:</b> <i>TRANSPORTATION</i>	<b>Category Code:</b> 1500
<b>Letter #:</b> 8	A science-based approach to the analysis of forest roads is presented in the FS publication FS-634 Roads Analysis which was published in August 1999. We request that FS-643 be used in this evaluation to determine the specific values of each motorized road and trail. We request full use of the FS-643 Road Analysis Manual in order to adequately account for the social, economic, cultural, and traditional values that motorized roads and trails provide to the public. FS-643 should be used on every road and trail segment in order to adequately identify and evaluate the needs of motorized visitors and in order to avoid contributing to additional cumulative negative impacts to motorized visitors. Please acquire easements across the private land in Middle Fork of the Judith or build trails around or extend Weatherwax Road 2056 to the Middle Fork.

**Response:** Throughout the entire process of putting the Forest Travel plan together, the Road’s Analysis manual’s guidelines were taken into consideration for all roads and trails.

Replying to acquiring an easement or construction of new trail in order to gain motorized access to the Middle Fork of the Judith, the answer is two fold. First the likelihood of obtaining an easement in the Middle Fork is slim and most likely would require condemnation. The present location is in and out of the streambed and prior to obtaining an easement, relocation to a more suitable, maintainable location would be required. This route primarily provides access to private landowners and terminates at the edge of a designated roadless area. Land management does not favor increasing the ease of access to a designated roadless area. Secondly, as previously stated, building a motorized trail from the Weatherwax road easterly into the Middle Fork Judith area conflicts with the current designated roadless area strategies. This area is meant to have a wilderness feel to the end user.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 22	Haymaker road #602 is an area we strongly recommend remain open to 4x4 traffic, because it is the only access to this portion of the back country.	
<b><u>Response:</u></b> Haymaker trail 602 will be a restricted motorized ATV trail. Haymaker Canyon Rd. 8809 will be converted to restricted motorized ATV trail 602 from M.P. 17.096 to its terminus at M.P. 17.602.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 2	Road 834 on Harley Creek is located in or near the stream bed and should remain closed to full size vehicles. The FS should consider the complete removal of the road bed in the stream bottom above the recreation cabins as it is not necessary for access. FS is keeping more roads and trails on its inventory than it can adequately maintain, especially in riparian areas. We are very concerned with addition of new trails giving shrinking budgets and current difficulty maintaining existing trails.	
<b><u>Response:</u></b> The jurisdiction of the Harley Creek Rd. 834 currently is not clear whether it resides with the county or Forest Service. The matter will be resolved when a Forest Service lands specialist is assigned the project. The Forest Service recognizes the road’s poor location and environmental impact to the adjacent stream. The Forest Service does not need the road to manage the area. Presently the primary use is access to special use recreation cabins.  Records indicate that Harley Creek Road is under the jurisdiction of Cascade County. This road is required to remain open to allow access to Permitted Recreation Residence owners in the Harley Creek drainage.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 34	roads that originate on private lands should be closed to commercial recreational use unless the public has use of these roads.	
<b><u>Response:</u></b> Throughout the analysis and review of the transportation system, when private roads continued or crossed onto Forest Service lands and there was no known right-of-way, the prevailing action was to decommission those roads. If there were indications or potential that the Forest Service had some kind of prescriptive rights, it was noted in the corporate database as, “access needed” and would be pursued in the future as funding and personnel became available.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 8	The elimination of public access to public lands through private property has also contributed to the loss of motorized access and motorized recreation opportunities. We request that agencies acquire private land and right-of-ways to provide access to public land that is now blocked off to the public. Private property owners that border public land should not benefit from public land without providing access to the public. Any private landowner that owns land that borders public land and does not provide public access to that public land should also be denied access	

	<p>to that public land under the principles of fairness and reciprocity. Please acquire easements across the private lands in the Tenderfoot drainage, Pioneer Ridge, Middle Fork Ranch.</p> <p>Agencies are encouraged to keep motorized access through private land open to the public. Every public access closure through private land should be challenged and protected by asserting legal right-of-ways. The cumulative negative impact of this lack of action has created private motorized reserves on public lands or defacto wilderness/non-motorized/exclusive-use areas accessible only to private landowners. Agencies are encouraged to acquire private land and right-of-ways to provide access to public land that is now blocked off to the public.</p>
<p><b>Response:</b> See response for #34 of the 1502 category code. The Tenderfoot drainage is presently going through negotiations for a proposed land swap which if successful will gain more access into the drainage. As stated in the response for #8 of the 1500 category code, further access into the Middle Fork Ranch is not likely in keeping the area characteristic as roadless.</p>	

<b>Subject Code:</b> TRANSPORTATION		<b>Category Code:</b> 1500
<b>Letter #:</b> 4	On the Western side of the Crazies if we have concerns that the private landowners adjacent to the national forest might allow access to outfitters and thus block national forest service access allowing outfitters in where the forest service cannot monitor their activities.	
<p><b>Response:</b> The western side of the Crazies are managed by the Gallatin National Forest and are therefore not being considered in this Environmental Impact Statement. The Gallatin National Forest recently concluded a Environmental Impact Statement of their Forest travel plan and should be referred to them.</p>		

<b>Subject Code:</b> TRANSPORTATION		<b>Category Code:</b> 1500
<b>Letter #:</b> 25	We did not see clear specification of which roads or a schedule in regards to the extent to I (J) which road/trails in poor condition with maintenance needs which are delivering sediment to streams would be restored (methods and timing p. 211). This should be clarified in the final EIS	
<p><b>Response:</b> Some roads were identified in Table III-75. Though not specific elsewhere in Table III-73 and III-74, the roads within the 100 foot buffer of streams can readily be identified for future treatment. Treatments would be completed on a project-by-project basis and as funding becomes available.</p>		

<b>Subject Code:</b> TRANSPORTATION		<b>Category Code:</b> 1500
<b>Letter #:</b> 2	<p>Road 6424 beyond the Zhetners gate in section 30 is poorly maintained and contributing to resource damage as well as providing access for ORV trespass in the lower part not be managed as motorized access route.</p> <p>The Jefferson Division also contains numerous roads and trails that cross private land. Unless the FS has perfected easements or agreements with the landowners to ensure adequate maintenance and enforcement, these routes should be managed for the least damaging travel method available to maintain public access.</p>	
<p><b>Response:</b> The Tenderfoot drainage is presently going through negotiations for a proposed land swap which if successful will gain more access into the drainage.</p> <p>Throughout the review of the transportation system, when private roads continued onto Forest Service lands and there was no known right-of-way, the prevailing action was to decommission those roads. If there were indications or potential that the Forest Service had some kind of prescriptive rights, it was noted in the corporate database as, “access needed” and would be pursued in the future as funding and personnel became available.</p> <p>Under Alternatives 4 and 5, road 6424 beyond the private in-holding (Zhenters) is proposed for non-motorized travel only.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 35	Our specific concern against Alternative #5 for the Crazy Mountains is the lack of access to public land in the East portion of the Crazy's.	
<b>Response:</b> Present access on the eastern side of the Crazy mountains is very limited. The likelihood of gaining more access in the near future are slim. Relationships with most landowners in this area are not favorable. Gaining access could be a very long process as well as costly. As more funding becomes available, access issues will be addressed in timely fashion.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 211	I would like to see the Harley Creek Rd reopened. Note that the Harley Creek Road was closed by the USFS	
<b>Response:</b> A portion of the Harley Creek Rd.834 was closed due to a significant storm damage throughout the immediate area. The method of repair was to limit the type of access with a barrier and convert the closed roadway to motorized trail vehicle. This method was chosen due to lack of adequate funding and the poor alignment throughout the roadway.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 211	Roads 641, 6383 and other roads created by logging would no longer be open to firewood gathers with a pickup. I have used this area for firewood since 1975 and held a commercial wood cutting permit for several years off road 641. There is still a great abundance of firewood to get next3 to existing roads, however if any alternative except no. 1 is selected this would prevent firewood cutting in the area.	
<b>Response:</b> Roads 841 and 6383 have been designated as mixed use roads to provide OHV experiences to end users. Being mixed use roads there will continue to be access for firewood gathers.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 27	Private landowners from the Smith River area east of USFS lands should not have sole A TV access to the Deep Creek Park area (USFS lands) without equal access for the general public. clusions will be arbitrary and capricious.	
<b>Response:</b> Present access on the eastern side of the Crazy mountains is very limited. The likelihood of gaining additional access in the near future are slim. Relationships with most landowners in this area are not favorable. Gaining access could be a very long process as well as costly. As more funding becomes available, access issues will be addressed in timely fashion.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 313	The draft discusses construction of a new road down Arch Coulee and the abandonment of the present Middle Fork road alignment. This alternative is not discussed in detail, and the economics and resource impacts of the new road are not discussed at all. The FS should provide the public with a detail of the new road proposal, including design criteria and detailed resource impacts and mitigation	
<b>Response:</b> The proposed Arch Coulee is presently at best a plan for the future. The Middle Fork Judith's plan is to keep the characteristics as close to the roadless setting.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
<b>Letter #:</b> 515	I have a ranch down Belt Creek known as the Nolan Ranch. The only way to get into the ranch is by a Forest Service permitted road. The access is locked and no one uses the road unless I give them a key to get into it and they have my permission.. On your pictures that road is shown to be banned for motorized use I t would be my preference that the road be removed from all you pictures since it is not used by the public and is only for my use. I have another issue that I would like to bring to your attention. There is a trail from the switchback going Logging Creek that goes down the side of the mountain to the mouth of Pilgrim creek The road to the switch back is almost impassible and should be denied motorized use.	

**Response:** The request to remove pictures of the permitted road to your ranch is duly noted. The road that accesses the Pilgrim Creek is most likely the northern portion of the Divide Road 839. The section of road you speak of is very rough. Again, when funding becomes available, this road will most likely be realigned and constructed.

Under Alternative 5 access by those parties requiring access to their private in holdings will be permitted. The trail from the switchback is an illegal trail and will be unauthorized for motorized use under Alternative 5.

**Subject Code:** *TRANSPORTATION*      **Category Code:** 1500

**Letter #:** 516      All segments of classified roads that provide a connector to "make a loop" should be designated open for unlicensed vehicles.

**Response:** The region standard signing will be utilized throughout the Forest to inform the public of mixed use on the roadway.

**Subject Code:** *TRANSPORTATION*      **Category Code:** 1500

557      Roads 641, 6383 and other roads created by logging would no longer be open to firewood gathers with a pickup. I have used this area for firewood since 1975 and held a commercial wood cutting permit for several years off road 641. There is still a great abundance of firewood to get next to existing roads.

**Response:** Roads 841 and 6383 have been designated as mixed use roads to provide OHV experiences to end users. Being mixed use roads there will continue to be access for firewood gathers.

**Subject Code:** *TRANSPORTATION*      **Category Code:** 1500

**Letter #:** 408      Area of concern: Burly Peak area near Russell Point- off of road NF Primary 487 - the road going through the private property is private and not open to the public.

**Response:** The road in question most likely was the easterly end of the Willow Park – Haymaker road. In the past, the private landowners gave verbal agreement for the Forest Service to cross their land to gain access to the area. That section is no longer shown on the travel plan and has been eliminated from the transportation system.

**Subject Code:** *TRANSPORTATION*      **Category Code:** 1501

**Letter #:** 19      The DEIS is diluting the loss of high quality trail miles by including roads in many of the tables.

**Response:** Roads are shown, as well as trails, because many members of the public are interested in both subjects. We do not dilute data, we provide as much as we reasonably can to inform the public and decision maker of relative pro's and con's of each alternative.

**Subject Code:** *TRANSPORTATION*      **Category Code:** 1501

**Letter #:** 4      We wish to keep open the currently established FS trails to the motorized off road vehicles users. These existing trails allow for a loop trail system, which will keep traffic minimized while allowing motorized access to the national forest. We wish to keep open the single-track trails that provide a loop trail system consisting of trails 640, 630a, 631, 632, 633 and 641. to insure a loop trail system on the western portion of the crazies we would like to keep open trails number 644, 639,

204      I hope the FS will consider the development of more loop trail systems.

**Response:** We understand your concern about the importance of keeping loop opportunities open, but can not always accommodate that in light of other resource and social concerns. We will do it whenever we can, within guidance of the Forest Plan for resource protection, and while accommodating, in certain places, the desires of the non-motorized community. The existing alternative and Alternative 3 provide the most loop opportunities but do not adequately recognize existing resource and social concerns.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
27	<p>Roads, trails and access points that are to be open should be signed open and identify restrictions. As part of the travel plan, all others routes are closed to use and are not signed. Educating the public that only designated travel routes are open all others are closed. This would be also illustrated through a travel plan map produced and distribute through USFS offices.</p> <p>The Department is concerned about the USFS's proposal that has been mentioned at public travel plan meetings about having future travel plan maps only show routes that are open on the map. In order for this to work as planned, the USFS will need to do a much better job of signing roads and trails in the field. Recommend having a map that shows all the existing roads/trails with roads/trails that are open for public use highlighted in some way.</p>	
<p><b>Response:</b> The agency will ensure that existing roads and trails are identified so the public knows what route they are on. This is the minimum requirement for signing. The MVUM(motor vehicle use map) will be the enforcement tool, not signs showing routes as open. We do intend to provide some signing, within our financial capacity, showing the kinds of use available on major roads and trails, but this is only to help the public understand opportunities on these routes and is not necessary from a law enforcement standpoint. The agency is developing a travel plan implementation plan, including needed signing, maps, bulletin boards at trailheads, and posters to inform the public on changes associated with the new travel plan. We agree with your concerns and intend to have maps in addition to the MVUM, so people can navigate on the forest. The MVUM is required for use by national direction. .</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1502</b>
<b>Letter #:</b> 452	<p>Would it be possible to acquire easements across the private land or build trails around it on public land? What about extending Weatherwax road 2056 to the Middle Fork?</p>	
239	<p>Please acquire easements across private I and in the Middle Fork and Judith, or provide trails around these areas.</p>	
248	<p>Consider acquiring easements across private land on the Middle Fork Drainage, Pioneer Ridge and the Tenderfoot Drainage.</p>	
113	<p>Please acquire easement where necessary across private land in the Middle Fork. We also need easements in the Tenderfoot, Pioneer Ridge and Middle Fork.</p>	
<p><b>Summarized Comment:</b> People want an easement for public access through the Middle Fk. Ranch.</p>		
<p><b>Response:</b> Alternative 3 shows trails constructed around private lands, unlike any other alternative. The agency has attempted in the past to work with private land owners to obtain public access across private land, and will work in the future if they become willing. Such would save the need for trail construction around private lands to provide needed access. The number of private owners has grown, making access more difficult, especially with unwilling landowners. Opportunities to condemn private land to obtain much needed formal public access is not presently a tool we have available. The public, as a result, suffers as more and more private landowners in critical locations adjacent the national forest become less and less willing to accommodate public access. Some public landowners may also feel the impacts of certain members of the public who disregard the need to close gates or stay on trails. The idea of extending Weatherwax Road down to provide access to the Middle Fork of the Judith is not plausible because it is a wilderness study area, where new road construction is not permissible..</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 33	<p>Any route that can be created solely by the passage of motorcycles. Jeeps, or ATVs can now qualify as a road or trail under the USFS's definition. This broad definition is illogical and illegal. attempting to illegally recognize user created roads and trails in the transportation system; and as explained above, illegally attempting to render any and all statutory, regulatory, or LRMP prohibitions or limitations respecting roads largely superfluous.</p> <p>The USFS's proposed definition for "road" and "trail" in the DEIS is too broad, extremely confusing, and illegal. This is extremely confusing and misleading. At a minimum, the USFS needs to adopt a definition and criteria at clearly distinguishes roads from trails. By blurring (or removing) the line between roads and trails and retaining the flexibility and discretion to label a</p>	

	road a trail, the USFS is, in effect, "Circumventing the requirements of its own regulations, policies, and Forest Plan. Using the current definition, therefore, the USFS can easily circumvent these and any prohibitions or limitations on the use or creation of new "roads" in roadless areas, WSAs, Wildlife areas, or other primitive areas simply by calling a new route a trail or renaming an existing road a trail. The USFS can circumvent the road-density standards in its own Forest Plan by labeling the route a trail. "). In short, the USFS's semantics game severely undermines all statutory, regulatory, and Forest Plan prohibitions respecting roads. Why bother prohibiting new roads when a 60 inch route used by motor vehicles can simply be deemed a trail?"
	<b>Summarized Comment:</b> The commenter does not agree with national direction allowing trails to be wider than 50", because she thinks it is illegal, broad, confusing, and enables the agency to misuse the definitions to allow for more user-developed roads or trails on the forest, including roadless areas and Wilderness Study Areas etc. She feels that the agency will use this to circumvent road density standards by labeling roads as trails.
	<b>Response:</b> National agency direction allows the agency to define trails large enough to accommodate 4x4's and other road vehicles, and to describe them as trails. In the past we have not had such trails, but they would offer the advantage of enabling more use by youth 12-16 years of age, and non-street legal vehicles that can not presently be used on existing roads. Of course, the user of such vehicles would have to legally get these vehicles to the trailhead. None of the alternatives in the DEIS proposes 4x4 trails, but it would provide more opportunities for ATV use on facilities that are already in existence, making it unnecessary to spend a lot of capital investment trail funds to create new ATV trails. This is not an effort to get around road density direction contained in the forest plan. The FEIS describes in the recreation issues section agency concerns with undetermined roads and trails, and the disadvantages of using them. Table II-8 describes by alternative how many are kept. Only about 20-25% of them are kept in any action alternative.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 40	Oppose the closure of the following trails, which will prevent loop traffic #638, ##639, #635, #642, #643, #644. The closure of trail #717, leaving Wapiti Peak to the bottom of the Bear trap and leaving the bottom of the Bear trap on Trail #725, again intersecting with trail #718, which will eliminate a looped trail. Keep the middle fork of the Judith River open to motorized traffic. Trail #437 should be designated as open. A trail around the private land needs to be constructed, intersecting with the road at Grendah MT, which would create a looped trail.	
	<b>Response:</b> Alternatives 1 and 3 discuss the Crazy Mountains trails 638, 639, 635, 642, 643 and 644 and effects of motorized use on the surrounding environment. Alternative 3 discusses trail 437 as opened to motorized use and the effect on the environment.	

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 578	Pasture Gulch area provides an opportunity to enhance winter views and has a high amount of snowmobile use. A closure will create a private property only use area. Whetstone ridge and Creek drainages are also highly used by snowmobiles. Non-motorized users prefer the multiple use trails as they are the best maintained and provide the best recreational experience. The problem comes when the FS does not properly sign the trails. When a picture of a motorcycle, A TV and snowmobile are shown at the trailhead with a circle and red strike through them, it portraysto lthe non-motorized user that this trail is closed to motorized users. Many people do not notice the dates that are associated with the sign showing when the motorized closure applies. The conflict between users is being caused by the agency and its disregard for the need of clear signage.	
213	Re-designate the south end of trail 309 from the proposed back-country air strip to trail 311 to provide for ATV excess. This modification would allow one to access the air strip from either side of Deep Creek Park with an ATV, which for safety measures may be needed.	
176	I want Deep Creek open without seasonal restrictions. Why make it a private outfitter camp? Keep Balsinger and lower Tenderfoot open to bikes. Trail 734 and 733 must be kept open to allow access to pioneer ridge from Oti Park. Trail 336 needs to be accessible to bikes from Belt Park road. We need more loop trails. The Forest Service needs to build trails around private in holdings rather than using such lands as a catch to prevent access.	

186	If they shut off the Double Gulch Trail it cuts off a nice loop to ride on. There is no reason to shut off this trail
239	Trail 419 it is an important trail to leave loops open in the fall. Trail 342 open to motorized from trail 344 Taylor Hills to 342 Lost Stove. I would recommend putting trail 722 back on the map as a motorized route to Calf Creek. Also Trail 732 to Hoover to Oti Park there is no reason to close Pilgrim Creek.

**Summarized Comment:** People expressed concerns about several specific trails and loops.

**Response:** All alternatives in the DEIS considered some level of motorized loop opportunities. Not all alternatives considered the Air Strip in the Deep Creek Park Area.

Letter 239: Alternative 3 discusses trail 419 as opened to motorized use through the fall hunting season.

Letter 578 discusses no restrictions to snowmobile use during the winter snowmobile season. The use of the current Forest Travel Plan signs and sign protocol, is effective in the majority of cases. Many adjacent forests have the same type signs, thereby making it easier for various users from various forests to understand the regulations and policies. However there are users that need to slow down to take the time to read and comply with current restrictions.

Alternative 3 proposes and considers Double Gulch Trail # 354 for motorized use single track use. Evaluation criteria listed in Appendix C page 350 of the DEIS was used to determine the need for motorized use throughout the Little Belts

Alternatives 1 and 3 considered the entire length of Tenderfoot trail 342 for motorized single track use. Trail 722 in alternative's 3 and 5 is considered for motorized trail use. Trail 732 in alternative 3 is considered for motorized use yearlong and in Alternative 5 trail 732 is considered for motorized use with seasonal restrictions in addition to partial closure to address water/ sedimentation and fishery issues. Appendix C on page 350 of the DEIS describes the criteria used to evaluate travel management on the Jefferson Division.

Alternatives 3 and 5 propose that trails 734 and 733 remain open to motorized travel. Alternative 3 considers construction of a motorized trail around the private land to access trail 336 over Big Horn Mountain. Alternative 3 proposes and considered trail 336 for motorized use. The Evaluation criteria found on page 350 of the DEIS was used to assist in determining travel management throughout the Jefferson Zone.

All publics are allowed to camp within the 16 day stay limit on National Forest System Lands on the Lewis and Clark National Forest Jefferson Division. Outfitting and Guiding is handled through a special use permitting process and does not discriminate from others camping or hunting in the same area as the permitted Outfitter.

<b>Subject Code:</b> TRANSPORTATION	<b>Category Code:</b> 1500/1501
511	At a minimum, it is important to start with a travel plan that does not recognize illegally created and unauthorized roads. Any unauthorized road or trail should have to go through the NEP A process. If any of those unauthorized roads can REPLACE a legally authorized road and do less damage to resources in the process, that would be a good reason to legally recognize the road by incorporating it in the new travel plan.
639	In particular, I am concerned about the South Fork and Middle Fork of the Judith River, Yogo Creek and the Daisy Peak Area. I am especially concerned with public access from the South Fork Road #487 to Ettien Ridge Road #821 on the east end of Ettien Ridge road #821 . Right now the only access is through the creek at Judith Ranger Station. This concerns me for many reasons: a) safety; b) noise c) riparian ecosystem and 4) year round accessibility. The Judith Ranger Station campground is usually very crowded right in the crossing area and you have to go through the middle of the people to access the Road #822 to get back to the main south fork road. In addition to be a noisy distraction for other public land users, often times younger people are swimming there at the crossing and it can be dangerous to those folks as well. In addition to

	the noise 8: safety factor, there is a great erosion problem when all ATV and motorcycle traffic is forced through one creek/riparian area. Late in the hunting season, cold weather causes the water to ice up and become very dangerous or impossible to cross.
688	Blocking up the Tenderfoot Deep Creek Roadless Area, Pilgrim Creek Roadless Area or the Middle Fork of the Judith Wilderness Study Area would provide an opportunity for hikers and horseback riders to either follow a two or three day loop trail or set up a base camp to hike or ride from in a primitive setting.
<b>Summarized Comment:</b> People are concerned about the road & trail system within roadless areas.	
<b>Response:</b> The Deep Creek, Tenderfoot and Pilgrim Creek areas and associated trail systems are considered in Alternatives 4 and 5 as non-motorized trail systems and would provide opportunities for hikers and horseman to experience a semi primitive recreation and loop opportunities.	
Alternatives 3 and 5 discuss various routes into the Middle Fork of the Judith River. Alternative 4 discusses no motorized use in the major roadless areas as well as the Middle Fork WSA.	

<b>Subject Code:</b> TRANSPORTATION	<b>Category Code:</b> 1501
<b>Letter #:</b> 255	Trail 732 is one of our favorite rides because it makes a nice loop with trail 734 and 736. Trail 732 is one of the few that allows you to ride late into the fall. Our main trail we hope to keep open is 732. From Oti park to where it intersects with trail 734 on Hoover Ridge. Other trails I hope that remain open is 736, 734, and 735. our favorite trail is 732, it is good for us because it's not super challenging. Horse tear up the land just as much as bikes do if not more, horses leave their droppings all over the trail. I think that the closure of trail 732 would have a devastating impact on many families recreational activities. Closing the trail would mean that families much like my own would not get to enjoy and experience many of the things that the spectacular wilderness in this area offers.
322	We need ATV loop that include trail 718 V651 V652 618 in the Castle Mountains. Taylor Hills Trails 344 can loop down N Fork of Tenderfoot to Mongar Creek up the Bald Hills to Monument Peak. Back tot eh main road again. Calf Creek trail 724 Loop down to Sheep Creek Road go NW on main road to Cabin creek Trail 712 make another loop or trail 720 Yogo Peak 435 to 444 down Woodchopper to Middle Fork of the Judith Back up King Creek. Back to main road.
327	King Hill C.G. Powerline - make a 4 wheel trail route would accommodate folks coming out of C.G. Hook trail into Mizpah trail Prevents vandalism make a loop on back side of Porphory.
403	I support Alternative 1 of the proposal. Alternatives 2 & 3 are too restrictive, and close historically used roads and trails. Some-further suggestions: In the Little Belt, allow non-motorized use on the Mizpah Trail utilizing the outer edges of the ridge as a natural boundary, allow non-motorized use on the Dead Man Trail utilizing the outer edges of the ridge as a natural boundary, Allow non-motorized use in the bottom of the Jefferson Creek drainage utilizing the valley floor as a natural boundary, add a groomed snowmobile trail from Jefferson Bowl east towards Tepee on road 251 east for approximately 1.5 miles, add the additional groomed trails included in alternative 3, cut out all large blocks and more define the trails for non-motorized use. Pasture Gulch area provides an opportunity to enhance winter views and has a high amount of snowmobile use. A closure will create a private property only use area. Whetstone ridge and Creek drainages are also highly used by snowmobiles. In the north end of the Crazies, closure will create a private property use only area. Forest Lake and Elk Lake both see a lot of use for hunting and snowmobiles. Areas of concern are North Fork of the Big Elk Creek Loco Peak and the ridges of the entire area. They provide scenic vistas.
<b>Summarized Comment:</b> People provided specific comments about specific trails.	
<b>Response:</b> In the DEIS alternative 5, trail 732 is considered for seasonal restrictions to allow for increased elk security during hunting season and remains a motorized signal track trail in all alternatives except Alternative 4. Other fall riding opportunities are considered in Alt 4 and 5. Alt's 1, 4 and 5 gave consideration to maintaining a network of motorized loops for ATV and motorcycles. In the DEIS, page 350 Appendix C lists the travel management criteria for the Jefferson Division	

Alternatives 3, 4, and 5 of the DEIS gave consideration and proposed conversion of U351 (Mizpah) to an ATV trail. This would accommodate use from the Kings Hill Area and Divide Road 839. Appendix C of the DEIS, page 350 lists evaluation criteria used to determine travel management on the Jefferson Division.

Letter 322: Alternative 3 discusses ATV loops on those trails mentioned in the Castle Mountains. Alternative 1 discusses motorized use in most of the Pasture Gulch area. The Forest Lake area does receive a lot of hunting and snowmobile use, however the Elk Lake, Big Elk Creek, Loco Peak areas receive a significant lesser amount due to restricted access from the adjacent private property owners.

<b>Subject Code:</b> <i>TRANSPORTATION</i>		<b>Category Code:</b> 1501
<b>Letter #:</b> 302	It is hard for me to believe after all the years that the area known commonly as the "Jefferson Bowl" Snowmobile Play Area still cannot be correctly identified on the map. It is the headwaters of Hell Creek, in the NW corner of Sec 19, T19N, R9E and NE corner Sec 24, T19N, R8E, north of FS routes 2088 and 2087 as depicted.	
<b>Response:</b>	The Jefferson Bowl Area is no longer depicted on Snowmobile Maps. The last printing which the Jefferson Bowl Play Area was depicted on was in 2001. Both the 2005 and 2007 snowmobile maps no longer show this area and it is not officially designated as a play area. However, heavy use by snowmobiles occurs in this area.	

<b>Subject Code:</b> <i>TRANSPORTATION</i>		<b>Category Code:</b> 1501
<b>Letter #:</b> 414	Closing the Pilgrim Creek, Tenderfoot and Deep Creek wouldn't affect me because I have the horses but, that doesn't make it fair to the people who don't have the luxury of owning horses. I believe that closing Pilgrim Creek, Big Horn and Tillinghast Is setting up an area for a new outfitter to access a license.	
<b>Response:</b>	There are no plans or applications nor has the FS conducted an outfitter needs analysis which is required prior to establishing additional Outfitter Guide Permits to add additional outfitters to the Pilgrim, Tenderfoot or Deep Creek Areas.	

<b>Subject Code:</b> <i>TRANSPORTATION</i>		<b>Category Code:</b> 1501
<b>Letter#</b> 429	<p>Tr. 's 310.331.301 I do not support the closure of these trail from the intersection with Tr.# 354 but I understand there is a landowner issue involving Tr.'s310 and 331 across private land. These closures along with the proposed closure of a portion of Tr.# 309 and the yet to be built Tr.# 311 takes away any access to Smith River from Monument Peak. I very concerned with the shown closure of Tr. #424 and 437. I understand there was a proposed re-routing of the trails in the Middle Fork area to accommodate both motorcycles and ATV s. if the re-routing took place it would solve the two main issues concerning the Middle Fork area; 1) the water quality issue and 2) alleviate the access issue with the private landowners</p> <p>Recommend Tr.# 732 from Hoover Ridge to Oti Park be open to motorized use. Even though the area seems to be slated for wildlife security during hunting season, I feel the adverse effect to wildlife during the summer months after calving time would be negligible. Open from June 1 to Oct 15 would give both use of the trail and wildlife protection. Logging Creek Area</p> <p>Recommend Tr.# 304, Pilgrim Creek, Tr. 315, Tobins Gulch, Tr.# 336 and Tr.# 332 be open to motorized use but close Tr.# 305. There does not appear to be any user conflict in this area and the wildlife id abundant. Tr.# 305 dead-ends at private land with no possibility of any future access for trail use, it could be closed. The need in this area for elk security is not justified as all forms of wildlife are plentiful and do not seem to be disturbed by any type of trail use, motorized or non-motorized, on the rail in the Pilgrim Creek area.</p> <p>Hoover Creek Drainage: I was under the impression there is a water quality/fish issue in this area as per discussion in collaborative meetings with biologist. Good scientific evidence. If this is the case, why are the trails proposed closed to motorized but only to horse and foot traffic? Trail should be closed to all groups until this problem is mitigated. Trails need to be relocated. Although I am opposed to lost motorized opportunities, if the Hoover Creek drainage water quality/fish issues are resolved and still remains closed to motorized but will support the needs of the horse folks, I personally would support this action if the short stretch of trail on Hoover Ridge connecting trail 736 with the trail to Big Baldy Mountain, be listed as a shared trail open</p>	

	to motorized use making a loop opportunity.
531	Double Gulch Trail 354 Should remain open. Bair Company has not asked for the trail to be closed across its private company. Pilgrim Creek Trail should be continued as a full loop trail. It is great to have it this way so we don't have to double use the trail.

**Summarized Comment:** People provided specific comments about specific trails.

**Response:** In all alternatives of the DEIS opportunities for differing levels of motorized loops were considered and proposed. Each alternative will consider the effects to wildlife, water quality, soil and sedimentation and social issues. Alternative's 4 and 5 considered maintaining differing levels of motorized access to the Smith River Corridor. Appendix C of the DEIS describes the evaluation criteria used to determine Travel Management for the Jefferson Division.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 583	Specifically, Please close trail 342 in the Tenderfoot drainage to ATV use and permanently close road 6426 which is now being used illegally by ATVs. Trails around the South and Middle Forks of the Judith River ( 436, 437, 438, and 440) also should be closed to protect cutthroat trout populations.	
<b>Response:</b> The DEIS, in alternatives 4 and 5 consider closure of trail 342 and road 6426 to motorized use. Alternative 4 discusses the closing of the above mentioned trails to motorized use. Alts. 3 and 5 also discuss the effects of motorized use (creek crossings) on the cutthroat population.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 635	Hoover Creek: The proposed travel map has some trails closed in the Hoover Creek area but leaves others open. Not only are the multiple trail crossings in Hoover Creek a poor place for ORV traffic, but leaving open some trails will bring more ORV use on already steep and heavily eroded trails. The FS should concentrate on foot bridges for crossing Hoover Creek, not ORV crossings. The Hoover Ridge trail is so heavily eroded on the steep parts, that it is difficult for any user to enjoy.	
<b>Response:</b> Alternative 5 proposes the closure to motorized and horse use segments of the Hoover trail system trail with multiple creek crossings. Additionally the Lewis and Clark Capital Improvement Trail Program address the need to reroute segments of steep eroded trails in the Hoover Creek Trail Complex. Work on this system has started as of June 15, 2007.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 342	Headwaters of the Tenderfoot which is a Study area and has been open to motorcycles. You have this gated and allow these College students too drive there new SUVs in on this road and your Forest Service personal to go in but I cannot take a motorcycle. There is some sort of injustice here.	
<b>Response:</b> This area is designated as an Experimental Forest and benefits research. Present ongoing studies require and permit administrative vehicular travel into the research area.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1502</b>
<b>Letter #:</b> 313	I have visited with the County Attorney about the legality of the Middle Fork road. This road has been in existence since the early 1900s, beginning with wagon travel. The public has been using this road uninterruptedly for over 100 years. A prescriptive right has been established for continued use of this road as indicated by the six required elements: Continuous and uninterrupted use Substantial use by some members of the public Owners not hostile and non-permissive Use for a period of at least years Recognition by local authorities, no obligation to maintain 6. Use over a fixed and definite course (Information from Western Seminar Workshop for Public Road & Federal Access law)	
<b>Response:</b> Public rights of access on this road to private lands are not in contention. There is historic use of the road to the private land by the public. A more important issue is the impacts of significant public road use where crossings of the M. Fork Judith river cause sediment delivery to the river than can not be adequately mitigated. That will be an essential element of any selected alternative.		

<b>Subject Code: TRANSPORTATION</b>	<b>Category Code: 1502</b>
36	Trail #311, the new Travel Plan Park, all the way to Smith River. The public is entitled to the same level of access and use that is presently awarded the private land owner and outfitter in this area.
487	If there is no change to the general plan my letter of November 17, 2005 enclosed covers. My position as it relates to the Smith River corridor. When looking at the map you sent me, I see along the Deep Creek-Smith River Corridor there will be no Motor Vehicles along trails 331, 310, 354 and 8. As these trails are drawn on the map they cross into private land several times to their end point at the Smith River. Trails 331 and 310 cross thru section 5 and 7 which I own. How can these trails be drawn on maps that move from National Forest land through private lands back to the National Forest Trail with no permission for access granted by the land owner. This concept promotes trespassing. Is the Forest Service going to provide signage and enforcement for these areas? How will people know that they cannot reach their destination without crossing private land which they do not have permission to access? This issue has to be addressed no matter what changes are made to the usage of Lewis and Clark National Forest.
635	Trail 311: The history of trail 311 indicates that it has been controversial for many, many years. Since this trail begins on private land in the Smith River corridor that requires a major river crossing for access, it is basically a private use. The NF should not encourage private use of trails. Moreover, allowing this trail to be open for ORV's encourages connection with ORV's from the Divide Road into an area that should be part of a block of land that excludes all ORV's. Some alternatives allow ORV use of Pioneer Ridge Trail 734. This is a bad idea. There historically has been little ORV use of this trail and, therefore, the erosion is minimal. The trail is usually open early in the year after the snow melts but the trail is still soft, so ORV users will grid it up very quickly. There is great plant diversity on this trail including a large bitterroot population. A portion of the-trail climbs through an open park to the ridge, and this will invite ORV hill climbing damage.
645	<p>I started recreating in the Smith River drainage and Deep Creek Park in 1970. At that time, thirty-five (35) years ago, I began using FS trail 311 for sight seeing and hunting. And until the past decade the FS never had a problem with public access to Deep Creek Park via trail 311. This all changed, however, in t1992 when the FS swapped land with outfitters/guide Gary Anderson. In 1992 the FS completed a land swap in the Deep Creek Park area with Gary Anderson. Knowing that this land swap would cut off all public access to the east side of trail 311 and 309 from Smith River, the FS promised a new trail would be built to replace the trail lost in the land swap. The FS promised if the public didn't object to the above referenced land swap, that they would in turn build a new trail 311 that would restore the public access to Deep Creek Park which was eliminated by the land swap. The FS, however, broke their promise to the public by never restoring trail 311 to its original status. It is true this year 2006, the FS finally built the section of trail they promised 1992 but they never opened it to the public with the access they promised. Simply put, in 1992 the FS promised that trail 311 would be re-built after the land swap allowing year-around access by ATV's and two-wheel bikes. Today, however, trail 311 is only open until Oct 15th, one week before big game rifle season opens. And, it is closed to ATVs year round.</p> <p>included are previously submitted comments. These are being resubmitted for the records because all of our positions basically remain the same The only change is that the new travel plan should provide for all forms of motorized travel (A TV, trail bike, snowmobiles, etc.) year round from the east from Monument Peak Road # 2245, west on Trail 301 to Trail 311 all the way to Smith River.</p> <p>to give a second access point from Deep Creek Park to the Smith River, a new trail about 3/4 of a mile long can be made along the south property line of Gary Anderson's land to the FS road used by Gary to access his property. This would give the public two access points to the Smith River off of Deep Creek Park for year round recreational opportunities.</p> <p>The only change is that now that Trail #311 has been completed, the new Travel Plan should provide for all forms of motorized travel, year around from the east to Deep Creek Park, all the way to Smith River. The public is entitled to the same level of access and use that is presently awarded the private land owner and outfitter in this area.</p> <p>At this time the only specific trail and area we wish to comment on is Trail #311 and the Deep Creek Park area our position is that trail #311 be useable by foot, horseback, motorcycle and ATV standards and be an integral component of the Deep Creek Park, Strawberry Ridge, Monument Peak, Pilgrim Creek, and Logging Creek trail system. This system would not only provide public access to Smith River, but also provide loop trails for users and access to this remote area by Forest Service, Fish-Wildlife and Parks and county law enforcement personnel as well as search and rescue units. Country</p>

	<p>would support the elimination of motorized use on the south/southwest portion of Deep Creek Park as the Fish, Wildlife and Parks biologists have identified this area as a critical wildlife area.</p> <p>The west trailhead of Trail 311 running east into Deep Creek Park has been open for use since the nineteen eighties for ATVs and motorcycles. My friends and family, who include elderly, disabled and handicapped people, have been allowed ATV access to enjoy the Smith River and Deep Creek Park. The Carlson ranch has supported motorized use on Trail 311 from the Smith River to Monument Ridge to allow full public access to one of the most beautiful areas in the Little Belt Mountains.</p> <p>in 1992, the FS promised the elderly, disabled and handicapped, that the new addition would remain open to ATVs. (Russell Country Sportsman Association Notice of Appeal Pursuant to 36 CFR 215, p. 4#, a copy of which is incorporated herein and attached hereto as attachment 1). Now, however, the FS's proposed trail 311 plan would have it be open only to two-wheeled bikes from the 1st of September to Oct. 15th.</p>
645	<p>I also believe Trail 309 in Deep Creek Park should be open to A TV use during the summer months as it is a wide, level trail suited for handicapped and disabled riders. The Carlson ranch is working with the Russell Country Sportmans group and other handicapped groups to ensure that Trail 311 remains a great trail that can be used by all. These groups are willing to work on the trail so it can handle ATV disable designed bikes.</p> <p>RCSA expressed the desire to have trail nos. 301, &amp; 311 open to ATVs. As discussed during the meeting this can be considered during development of the next travel plan.</p> <p>I am so frustrated with the mistrust, lies, and broken promises on trail 311 and now your proposed action, I feel as if I am wasting my time in dealing with the LCFS - I am saddened to say I feel as though I cannot trust your office.</p>
564	<p>I think the Tenderfoot area has tremendous potential for a quiet trail designation. More precisely that is the area from the South Fork of Tenderfoot Creek to the Smith River. Especially incompatible is the newly constructed 4 wheeler trail #338 which goes from off FR#269 to the South Fork of Deep Creek. This is to steep for hikers and horses and shows severe erosion damage. It should be at a minimum usable by foot and horse and not made exclusively for Motorized users.</p>
146	<p>Trail 301 and 310 should be open to motorized use on down to the Smith River (Trail 310 comes out across from the putting greens and the old machinery parking area, I don't see as a little dirt bike traffic will make much difference). This would provide a nice loop ride if road 263 is opened to public use. I see no reason to close trail 354 to motorized use. Again this provides a nice loop after it connects with the Tenderfoot.</p>
27	<p>FWP would recommend continued motorized public access in HD 413 except trail number 311 coming from the Smith River. Trail 311 from the Smith River is being used by exclusive landowners that are pioneering a private trail system on the Deep Creek side of the Smith River and should be obliterated or restricted to horse and foot traffic only.</p>
<p><b><u>Summarized Comment:</u></b> The public needs same motorized access to Smith River that private landowners have. A number of trails show up crossing private land. That encourages trespassing if permission is not given. Trail 734 should not be allowed to remain motorized, as it is now, because it is on a hill and has significant plant communities of interest. Trail 311 to the Smith River is controversial, with some wanting it motorized, and other nonmotorized. Trail 734 has concerns because of its adjacent plant communities and concerns when the tread is soft.</p>	
<p><b><u>Response:</u></b> Private landowners must follow the same travel plan restrictions as the public when on National forest. If a trail becomes non-motorized, it is non-motorized to their recreation use, as well as to the public. Exceptions would typically only occur if motorized use is deemed necessary to provide reasonable access to private land, or if it is part of a non-recreation special use permit that authorizes motorized use to accomplish certain resource objectives of the permittee. Even then, these permits have restrictions within them on where motorized use is authorized.</p> <p>Showing trails that cross private land documents the locations of such trails, and federal interest in being able to document our interest(the public's) in such trails, rather than not showing them on maps used by the public. The fact that the land is private is also shown, enabling a member of the public to deduce that permission will need to be obtained, if formalized public access has not been obtained. Willingness of more private landowners to accommodate public needs for access would eliminate this problem. Not showing such historic trails on maps reduces the public's potential to gain access on these trails in the future. Private landowners are free to post their lands as needed, or</p>	

cooperate with the Forest Service where there is public benefit to so doing. Allowing access on established trails will typically benefit the public with minimal impact on the private landowner.

Trail 734 would be open during the spring to motorcycle and ATV use in places in some alternatives, and the season would include the spring time. Illegal off trail use, or significant damage to the tread because of soft soil conditions, can be corrected through trail closure to motorized use through a special prohibition that can last up to a year, or even possibly permanent closure of the trail to motorized use if the abuse is flagrant and impactful to the resource, as part of the travel plan decision. This could occur if the decision is made to allow permanent closures if abused in the Record of Decision. This encourages the motorized community to police themselves in staying on the trails, and not using them when it is muddy and destructive of the tread.

Trail 311, 309, and other access to the Smith River is handled differently by each alternative. The issue of motorized vs. non-motorized access to the Smith River is well described on pp. 115 to 122 of the DEIS.

Trail 338 is shown differently by alternative. When shown as a motorized trail, it is always open to nonmotorized users, as well.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
<b>Letter #:</b> 4	We wish to keep open the currently established FS trails to the motorized off road vehicles users. These existing trails allow for a loop trail system, which will keep traffic minimized while allowing motorized access to the national forest. We wish to keep open the single-track trails that provide a loop trail system consisting of trails 640, 630a, 631, 632, 633 and 641. to insure a loop trail system on the western portion of the crazies we would like to keep open trails number 644, 639,	
<b>Response:</b> Alternative 3 discusses these trails as open to motorcycle use and the associated effects.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
27	It appears that the proposed plan will increase the densities of open roads and trails in this portion of the Belts. Many of the proposed changes identify as "open" those trails that are presently being used by motorized vehicles, even though they are not shown as open in the current plan. We are concerned that by officially sanctioning motorized travel along these additional miles of trails and roads, there will be a proliferation of even more new trails and roads in the future.	
<b>Response:</b> The 3 State EIS on OHV use required that all undetermined (often user-built) roads and trails in existence up to a specific date be kept available until further analysis via a travel plan was made. That is why Alternative 1, in Table III-8, shows so many undetermined roads. On p. 54-55 of the DEIS a desired condition against which all alternatives are analyzed is to keep only those undetermined roads and trails that meet the needs of the agency. This is clearly described on those pages, and each alternative's ability to meet that requirement is described on pp.63, 68, and 69.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
383	Until the draft EIS is formally considered, there should be no winter closure for motorized use. Jefferson Bowl, in particular, should not be closed to winter motorized use under any circumstances. It is a premier place for families to snowmobile. The Monument-Loop should be kept open even if it requires the FS and users to work out an agreement for land owners.	
<b>Response:</b> In Winter Alternative's 2 and 3 the area referred to as Jefferson Bowl and a route connecting Monument Peak to the P trail remains open to winter motorized travel.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
616	As a landowner I can tell you that Arch Coulee fills with snow in winter to make it impassable even by horse. The bottom along the river is the only way to access private land.	
<b>Response:</b> Thank you. This is a very good point.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
592	I currently have an ATV which I ride from lower Jefferson creek up trail 740 over to Woodchopper Ridge 444 down to the Middle Fork of the Judith River. It is a good ride and would be nice for a return route up the Middle Fork of the Judith.	
<b>Response:</b> This proposal is considered in Alt 3 of the DEIS. Alternative 1 shows this as a potential loop route and discusses its impact on the surrounding resources.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
8	<p>We request that Trail 419, Snow Creek , be left open until October 15. It is an important trail to keep loops open in the fall. In the Lost Fork of the Judith, trail 422 and 433 as well as the portion of trail 409 connection the two trail should be open to motorized use to maintain the loop opportunities with Ettien Ridge, Hay Canyon and the Middle Fork as well as providing OHV access for fishing and bow-hunting.</p> <p>The integrity of the "loop" trail system should be maintained. Loop systems minimize the number of on-trail encounters because non-motorized trail users don't encounter motorized users going both directions, as they do on non-loop trails. Loop trails also offer trail users a more desirable recreational experience. Agencies are encouraged to provide opportunity for "motorized loop trail systems" to lessen impacts and to provide a better recreational experience. Spurs are useful for exploration and reaching destinations.</p> <p>Existing single-track trails or potential single-track trails were not adequately identified and included in the project. There are many single-track "cow" trails that motorcycle trail riders could use in the project area. It is critical to preserve the integrity of the existing motorized single-track trails.</p>	
<b>Response:</b> The impacts of leaving the above mentioned trails open to motorized travel during the fall hunting season are discussed in alternative 3 and 5. Also reference is made to Appendix C of the DEIS, page 350. Alternatives 3 and 5 discuss multiple single track trails and show many loop opportunities that exist.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
33	The new ATV trail could link up wit trail 338 thereby opening up the entire Tenderfoot Deep Creek IRA to motorized access. Under NEPA, the USFS needs to carefully analyze this indirect effect. How will the wilderness character of the Tenderfoot Deep Creek IRA •be indirectly impacted? How will cutthroat trout habitat in the watershed be indirectly impacted? How will wildlife, in particular upland game birds and e.lk herds in Deep Creek Park, be indirectly impacted?	
<b>Response:</b> The effects of new ATV trails in proposed Alt 3 and 5 are analyzed in the DEIS.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
22	<p>Western portion of the Castle Mountains - We feel access to this area must be reviewed. We would like to see old roads reopened, specifically Yankee Jim Ridge to Manger Park using trail #719. Eastern Little Belts - Trail #478 and #479 should allow 4x4 traffic as this is one of the few technically challenging areas in Montana. No trail # on this trail in Sec 7 &amp; Sec 8, south of road #15717 and north of road #8817/15720. This is also a good road in stable condition and should remain open. (5) Road # 15716 to Twin Sisters has wonderful scenery and opens an area of unique geological formations (Golf Ball). Bartleson trail #8823 is a challenge and we request this be left as open to the 4x4 community.</p>	
<b>Response:</b> Alternatives 1, 3 and 5 discuss the recreational opportunities and effects of leaving these routes open. Reference is also made to Appendix C of the DEIS, page 350.		

<b>Subject Code: TRANSPORTATION</b>	<b>Category Code: 1501</b>
19	Trail 722 East Fork of Calf Creek 'Need' for closure was not identified in the DEIS.
<p><b>Response:</b> Trail 722 within the Calf Creek Trail Complex was considered for trail closure in Alternative 2 but upon further evaluation was determined to be an adequate trail to remain as part of the motorized trail system. Appendix C on page 350 of the DEIS lists Travel Management evaluation criteria for the Jefferson Division In 1999-2000 Trail 722 underwent and received reconstruction and rerouting work and was determined to be a adequate trail for motorized use. The initial Alternative 2 proposed a portion of this trail to be closed but this alternative was dropped from further consideration. Trails considered for closure and proposed in Alt 5 are segments of trail 712 and 724, from a wildlife will provide additional security during hunting season, and additionally limits motorized travel on these trails after June 30, when typically the trail system have dried out and is less likely to receive rutting and sedimentation problems. (See p 244 of the DEIS for discussion of direct and indirect effects) Alternative 5 considered seasonal restrictions for the entire area to motorized use between Sept. 1 – June30.</p>	

<b>Subject Code: TRANSPORTATION</b>	<b>Category Code: 1501</b>
635	<p>Big Baldy: ORV use in the Big Baldy area has left multiple illegal trails and harmed the hiking experience. There are at least two illegal ORV trails climbing out of Oti Park toward Butcher Knife Ridge. The switchback on the north Side of Baldy has disappeared in favor of an ORV trail that climbs straight up. The trail approach north of Baldy has multiple ORV tracks. I have hiked to the top of Baldy and while sitting enjoying a snack and the scenery had motorcycles buzz up the slope, spend one minute looking around and roar off. Such ORV use destroys the back country, wild experience that many people seek in the forest.</p> <p>Spring Creek and the problem of "hanging" non-motorized trails: Some of the Alternative maps including Alt 4, show non-motorized trails hanging off of motorized trails far from campgrounds. ATV trail 608A extends about a mile from the .Spring Creek Campground and dead ends at a hiking trail. I have hiked this area. Fawn Creek is particularly nice, but trail 608 has already suffered extensive ORV abuse over the years. It is inappropriate to start a trail as an ORV trail and then end it with a non-motorized trail. There is no place for the ORV to go except to continue on the non-motorized trail. This problem of "hanging" non-motorized trails at the end of ORV trails exists in several places on the proposed maps. The cure is to have the non-motorized trail start at the trail head, not some place down the trail.</p> <p>Calf/Pole/ Allan Creeks: This area is one of the small, roadless areas that has been designated open to motorcycles but should be protected from ORV assaults. These trails have not yet experienced the severe erosion damaging steeper trails, but, already, there are illegal trails cut through the forest and the creek crossings and wet areas show damage. There are plenty of roads in the area for ORV's. The Allan Creek area has stream crossings that will be damaged by ORV's. ORV trail 734 will encourage loop use that will require ORV's to illegally drive on Highway 89 matching their slower speeds to the 70 mph of vehicle traffic.</p>
<p><b>Response:</b> The use of motorized vehicles off designated roads or trails by any ORV is illegal in all proposed alternatives. ORV's which are equipped and determined "street legal" may drive legally and travel on US Highways to complete a proposed loop. In Alt 5 trails 712 and 724 in the Calf Creek area are proposed to become non-motorized to address resource issues related to these trails.</p> <p>Trail 608A (deadend atv trail) was put in place to allow hunters easier access to the "Round Grove" closure area (Woods Gulch/East Fork Spring Creek) which has resulted in better harvest and hunting opportunity on the forest.</p>	

<b>Subject Code: TRANSPORTATION</b>	<b>Category Code: 1501</b>
475	There should be more opportunities for handicapped folks. Like connecting road 2011 to 6421 and 2011 with 6400. 6419 should connect up with 6390 Hay Canyon so you have continue circle of travel 6534 should be left open and 6536 also 6392 up dry pole Canyon should connect up with 189 to make a circle of travel all these road should be accessible to handicapped people during the general hunting season. A new road down Arch Coulee to Middle Fork road 825 there is enough closures in the Little Belts.

**Response:** Handicapped hunting access are to be handled by each Ranger District. Currently 2-3 areas per District are accessible to handicapped hunters (access behind locked gates).

**Subject Code:** TRANSPORTATION | **Category Code:** 1501

248 | Lost Fork Trail 422 & 433 as well as the portion of 409 connecting the two trails would make a loop system and provide Off Highway Vehicle access for such things as camping, fishing, and hunting. Making a loop in the Daisy, Nevada, Haymaker and Mossey Narrows make good sense to me because of the beauty of the land.

**Response:** Alternative 5 discusses motorized use and the many opportunities for loop routes. However making loops routes is not always beneficial to the resource in all situations and is expensive with the very limited trail construction budget the forest gets each year.

**Subject Code:** TRANSPORTATION | **Category Code:**

**Letter #:** 294 | Lastly, it is the individual's responsibility to know the law; in this regard, I would urge the L&C Forest .to adopt the policy that a road or trail or area (in the case of over snow vehicles) is closed unless specifically signed as open. This practice can effectively reduce sign vandalism because a sign posting an area as 'open' will not be vandalized by motorized users, whereas we all know that signs that forbid an activity get vandalized routinely

**Response:** Under the new travel management regulations, greater responsibility is put on individual operators to know whether or not the area is open, and less reliance on signs for enforcement.

**Subject Code:** TRANSPORTATION | **Category Code:** 1501

180 | I believe the Forest Service should lean toward designating the trail for skiing. O'Brien Creek is a popular moderate route for cross-country skiers, while is it primary serves as just another access point for snowmobiles. It would also be helpful if the final plan also provided some options for providing access to more remote backcountry areas such as utilizing yurts or tents.

**Response:** O'brien Creek Trail as a cross-country ski trail was part of the winter resolution. Table III-30 show there are numerous, large areas on the forest available for non-motorized use, including your suggestions. Accessing the backcountry in the winter is possible by motorized or non-motorized mean. Use the alternative map to determine how you access the non-motorized areas. It is typically easiest to stay on roads that are non-motorized, to go long distances if remote non-motorized settings are your desire. Packing a yurt on your back can be a challenge. Snowmobiles may be advantageous there. Consider pulling off a highway that is open year round to traffic, and access a non-motorized spot that way. We leave it to your imagination to use the large expanses of non-motorized opportunities.

**Subject Code:** TRANSPORTATION | **Category Code:** 1501

525 | Trail 409 and 422 connect, to make an important loop trail, that both connect to 89.

**Response:** Reference is made to Appendix C of the DEIS, page 351, item #5.

**Subject Code:** TRANSPORTATION | **Category Code:** 1501

282 | Currently all of the trails in the Big Baldy roadless area are open to either dirt bikes or ATVs - and it shows. Soil erosion is evident on trail 416 leading to the summit of Baldy from the south. The motorbikes drive allover the open, high alpine grass. The area is becoming an ATV playground with more hillsides marred by user trails going straight up the face.

**Response:** Off trail use by OHV's does not adhere to current or future travel plan regulations and is illegal. All OHV's are required to stay on designated and established roads and trails per the 2001 Off Highway Vehicle Decision and current travel plan direction. Alternatives 4 and 5 discuss the environmental effects of motorcycle use in this area.

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
8	<p>We request that trail 2011 and 6421, north of Russian Flats be used as a connection because there is an old road that already exists. We request that trail 6420 to the South Fork Road or road 6419 be extended. We request that the proposed reroute via Arch Coulee to the Middle Fork Ranch should be open for public use.</p> <p>We request the creation of a new trail segment to connect the trail opportunities, short connector from road 3412 (O'Brien Park) to the highway, junction with road 267. We request a fair evaluation of the trail proposed in Alternative 3 in the O'Brien Creek drainage, taking into consideration that a collaborative group could adopt, secure funding for bridges and maintain the trail for multiple users, motorized and non motorized, summer and winter. We request that motorized trails noted as U753 and U351 in the Mizpah/ Porphrey area be kept open. We request that ATV use on snowmobile trail H 6407 from Divide Road 839 to Island Park Road 204 be allowed.</p>	
8	<p>We have noticed that most trails in wilderness areas are adequately maintained with clearing, water bar construction and trail rerouting provided on an annual basis. All of this is done by agencies without any user-generated fees. At the same time motorized resources see very little maintenance and motorized recreationists have had to do a lot of work themselves in order to keep motorized routes open even though OHV gas tax has generated over 8 billion dollars over the past 30 years. Moreover, to top off this incredibly inequitable situation, lack of maintenance is often used as a reason to close motorized recreational resources</p>	
<p><b>Response:</b> There is no doubt that the trail crew program on the Rocky Mountain front is more efficient, larger, and better funded than the historically small, district-centered trail crews of the past on the Jefferson Division. This is because the district is large and has historically been well-funded for blowdown from past fires, as well as earmarked Continental Divide Trail projects. On the Mussellshell District, most of their work has traditionally been concentrated on few miles of heavily impacted ATV/motorcycle trail located in expensive to maintain areas(Haymaker /Daisy, for example) That district receives an incredible amount of ATV and other OHV use that is impactive to existing trail systems. Presently, native log bridges installed in the late 1980's are now being replaced, and are high priority on the forest because of safety concerns with the old deteriorating bridges. Other workload is substantial inventorying and signing the existing snowmobile trail system on the forest. There is no question that we could do better in obtaining gas tax funding. Some gas tax projects have been funded in the past within the analysis area, but such partnerships and grant applications require time, and we intend to do better. Cooperation amongst the motorized community in staying on trails and policing those who don't know how will go a long way at reducing the workload created by user developed trails. Cooperation with local motorized clubs has been excellent in maintaining motorized trails. Surprisingly, we don't always have the personnel to respond to partnerships because of other requirements for our time. Reduced anticipated trail budgets won't help matters, but simplified trail grants and partnership opportunities will be better prioritized in the future.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1502</b>
8	<p>The elimination of public access to public lands through private property has also contributed to the loss of motorized access and motorized recreation opportunities. We request that agencies acquire private land and right-of-ways to provide access to public land that is now blocked off to the public. Private property owners that border public land should not benefit from public land without providing access to the public. Any private landowner that owns land that borders public land and does not provide public access to that public land should also be denied access to that public land under the principles of fairness and reciprocity.</p> <p>Please acquire easements across the private lands in the Tenderfoot drainage, Pioneer Ridge, Middle Fork Ranch.</p> <p>Agencies are encouraged to keep motorized access through private land open to the public. Every public access closure through private land should be challenged and protected by asserting legal right-of-ways. The cumulative negative impact of this lack of action has created private motorized reserves on public lands or defacto wilderness/non-motorized/exclusive-use areas accessible only to private landowners. Agencies are encouraged to acquire private land and right-of-ways to provide access to public land that is now blocked off to the public.</p>	

34	roads that originate on private lands should be closed to commercial recreational use unless the public has use of these roads.	
35	Our specific concern against Alternative #5 for the Crazy Mountains is the lack of access to public land in the East portion of the Crazy's.	
27	Private landowners from the Smith River area east of USFS lands should not have sole A TV access to the Deep Creek Park area (USFS lands) without equal access for the general public.	
<p><b>Response:</b> This Forest has had little success in the last 15 years of acquiring formal access across private lands. We have to have cooperative willing private owners desirous of allowing formal access. Our lands efforts have been underfunded in the past. We have no condemnation ability, but we agree that motorized access into the forest that goes through or originates on private lands needs attention, and private land owners should not have their own motorized access on forest lands that the public is excluded from. It is outside the scope of the travel planning effort to accomplish, or even define, needed access locations. The Forest Plan did such a study in the mid-1980's and locations of these needs have been updated since then. The program, however, receives inadequate attention, largely because of funding, and unwilling landowners. The effort needs to be improved.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
313	The draft discusses construction of a new road down Arch Coulee and the abandonment of the present Middle Fork road alignment. This alternative is not discussed in detail, and the economics and resource impacts of the new road are not discussed at all. The FS should provide the public with a detail of the new road proposal, including design criteria and detailed resource impacts and mitigation	
<p><b>Response:</b> The travel plan can speak only in terms of general new road and trail locations and their need to solve travel management issues. Project-specific NEPA will be done after the travel plan alternative is selected, and as funds become available, to determine exact locations and road and trail standards. The travel plan, however, does spell out the kinds of use that the road or trail is to accommodate. Similarly, the travel plan does not spell out details of how a road will be closed—only that it has been selected to be closed. NEPA work later will make those specific closure method determinations.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1500</b>
516	All segments of classified roads that provide a connector to "make a loop" should be designated open for unlicensed vehicles.	
<p><b>Response:</b> You are referring to mixed roads. This analysis provides an estimate by alternative of the number of miles of mixed roads, i.e. those that allow use by 12 to 16 year olds and non-street legal vehicles. These are estimates only, and another document will determine through an administrative decision which roads will allow mixed traffic. Safety is a key issue, and if a road that "makes a loop" is a busy arterial with limited site distance, it is likely not a good candidate for mixed use.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
431	The trail from Deep Creek Park down to lower Deep Creek across from Temple Gulch does not even exist, neither does the trail down Deep Creek below where the north and south forks join. I was there early this summer. I swear those trails do not exist. Why are trails that do not even exist designated as motorized trails?	
<p><b>Response:</b> In the DEIS Alt's 3, 4 and 5 the Temple Gulch Trail # 308 is considered for non motorized use only. Trail 308 Temple Gulch in the existing travel plan is designated maintenance level 1 and receives minimal clearing and brushing on a 1-3 year rotation, due to blowdown and limited use during the summer season this trail does is not always evident. Proper signing has been completed in previous years but signs may have been destroyed and or missing.</p>		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
429	Trail 354, Double Gulch: Recommend trail 301 from the intersection of trail 311 to the intersection with 345 down Double Gulch to the Tenderfoot be open to motorized use. This is a important scenic single-track loop that has been in use for many years without any landowner conflict. Tr. # 311. Smith River to Deep Creek Park. I am in support of the reconstruction of Tr.# 311 as stated in the letter dated January 20, 1999. (copy enclosed). I do not support the proposed construction of trail around Deep Creek Park or the changing of the trails from Monument Peak to Deep Creek Park from a single track to a two-track trail to accommodate ATV's. I feel this proposed new construction may create a conflict with the private landowner due to the increased traffic.	
<b>Response:</b> In alternative 3 Double Gulch Trail 354 is proposed and analyzed for motorized use. Effective at the end of 2006 trail 311 has been constructed for single track use around Deep Creek Park from Robertson Spring to Trail 311. In alternative 5 only trail 338 is proposed and considered for ATV or two track trail in the Deep Creek Area. Appendix C on page 350 of the DEIS describes the evaluation criteria used for determining travel management in the Jefferson Division.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
425	Balsinger Trail #343, leaving this trail open makes a good loop. To build a trail into Deep Creek Park why not build 1-1 1/2 miles of new trail from the bottom of trail 338 up to the Robinson Springs Trail. Repair 1 section of trail 338 and if you must go up into Deep Creek Park build 1-1 1/2 miles of trail instead of 8-9 miles.	
<b>Response:</b> In alternatives 3 and 5 Balsinger Trail 343 remains a motorized trail with a connecting loop to adopted trail U721 exiting out in the Monument Peak Area on Road 268. A four mile reroute of trail 311 around the private in holding was completed in 2006.		

<b>Subject Code: TRANSPORTATION</b>		<b>Category Code: 1501</b>
438	Trail 311 and 309 should be tied together and combined with Strawberry Ridge and Monument peak for access for the public for ATV access.	
<b>Response:</b> Some of this proposal was analyzed in Alt 3, and considered ATV access into the Deep Creek Park area via trails 338, 317 and 311 in addition to converting 309 to an ATV trail.		

## **VEGETATION COMMENTS/RESPONSES**

<b>Subject Code: VEGETATION</b>		<b>Category Code: 1600 – General vegetation comments</b>
<b>Letter #:</b> 463	It was obvious that several motorcycles had attempted to climb Big Baldy via Trail 416 but turned around when they hit the large stone. The highest peak in the Little Belts, with alpine vegetation galore, was open to motorized use, unbelievable. It was obvious that the motorcycles were not staying on the trail, but were playing on the open grasslands on the ridge and in the basin to the west.	
42	We suggest ending the snowmobiling season early enough (e.g. April 15) to reduce potential snowmobile use in marginally snow covered areas that could result in damage to fragile alpine vegetation. Are any measures proposed to protect fragile alpine vegetation from off-trail snowmobile use?	
<b>Summarized Comment:</b> Cross-country motorized summer travel and snowmobiling without adequate snow cover has the potential to damage alpine vegetation.		
<b>Response:</b> All of the alternatives proposed for summer motorized wheeled-vehicle travel restrict cross-country travel. Chapter 1 – Purpose and Need of the FEIS addresses the 2001 Three-State OHV Rule and Forest Plan Amendment 23 which prohibit cross-country wheeled-vehicle travel. Motorized wheeled-vehicle travel off designated system roads and trails for parking or camping would be allowed within 300 feet of the road or trail, unless signed otherwise, as long as five conditions are met. Resource specialists would help determine where this off-route travel would not be appropriate.		

Motorized travel in areas otherwise closed to motorized use may also be allowed for administrative purposes such as law enforcement, fire, emergencies, military operations, noxious weed control, and other official business purposes and for carrying out the provisions of certain special use permits or other activities such as administration of grazing allotments. All such use would require specific authorization from the appropriate Line Officer. Cross-country motorized travel where it is not authorized, regardless of the location and vegetation type, is illegal and a law enforcement issue. Snowmobile travel in designated areas on the Jefferson Division would be allowed from December 1 through May 1. Line Officers have authority to issue travel management modifications (area closures) if resource concerns are evident.

<b>Subject Code:</b> <i>VEGETATION</i>	<b>Category Code:</b> 1600 – General vegetation comments
<b>Letter #:</b> 15	The lack of information collection about sensitive plant species (and other resources) is out of step with NEPA’s mandate to take a “hard look” at environmental impacts.
<b>Summarized Comment:</b> Adequate information is not available to determine environmental impacts of the proposed travel plan on sensitive plant species.	
<b>Response:</b> Sensitive plant surveys are typically not conducted until a management activity, specifically a ground disturbing activity, is proposed. Plant populations, however, are also located during routine management activities and are appropriately recorded. The information used to determine the environmental effects of the proposed travel management plan is listed in Chapter 3 of the FEIS under the sensitive plants section. This is the most current sensitive plant information for the Forest. The Record of Decision for the Little Belt, Castle, and North Half Crazy Mountain Travel Management Plan will determine which routes will be part of the Forest’s road and trail system, acceptable travel modes by route, and seasonal restrictions. As stated in the sensitive plant section of the FEIS (Chapter 3), site-specific plant surveys will be conducted on all future ground disturbing activities designed to implement the Travel Management Plan.	

<b>Subject Code:</b> <i>VEGETATION</i>	<b>Category Code:</b> 1601 – Noxious weed comments
<b>Letter #:</b> D-34	Over the last 30 years we have fought a never ending battle with Leafy Spurge and other weeds which are not native to this area. Motorized vehicles would spread them even further into the LCNF. It took many years to eradicate only a small patch of leafy spurge on a field near us—imagine the devastation when motorized vehicles spread it throughout this beautiful land.
D-74	The draft environmental impact statement recognizes that noxious weeds are a problem and that motorized vehicles contribute the most to the introduction and spread of noxious weeds. Prevention is the least expensive and most effective means to keep areas weed free.
111	Motorized vehicle spread noxious weeds.
141	Motorized vehicles contribute the most to introduction and spread of noxious weeds because of size and/or distance of travel within a given time.
282	Although off road vehicles, including all terrain vehicles (ATVs) are not the only means by which noxious weeds spread, they are an important agent for spreading noxious weeds and often cited as a primary means of weed spread. During hunting season, they often come from other states or other parts of this state already loaded with weeds in their undercarriage. They are readily transported from one drainage to another, from one end of the state to another. ATVs from the Bitterroot can be in the Little Belts in a few hours, carrying with them not only their famous spotted knapweed, but also sulphur cinquefoil, leafy spurge, dalmation toadflax and numerous other present weed species. The draft environmental impact statement also recognizes that noxious weeds are a problem and that motorized vehicles contribute the most to the introduction and spread of noxious weeds. Noxious weed prevention is a cheaper and more effective weed control program than treating the noxious weeds after they have become established. How will a travel plan which allows vehicles to travel throughout most of these ranges prevent the spread of noxious weeds? A conservative approach is warranted utilizing large blocks of motor-free areas as buffers.
363	The Middle Fork of the Judith, upper Deep Creek and Hoover Creek are still largely weed free. With increased activity "allowed", weeds will naturally be introduced.
370	We hikers were very aware that a certain tall weed was not where it belonged. Up Sawmill Gulch, Dry Fork drainage, That plant was the hounds tongue. The plants were not anywhere but on or very near the trail / road. That means people and that means motorized people. It is a fairly safe

	presumption that hikers will not wear burr-infested shoelaces, stockings and outer garments time after time spreading the seeds. Other ungulates, deer, elk and maybe some predators can carry the seeds, but most wild animals are very fastidious about their fur coats and they don't haunt only the roads and people trails.
404	An ongoing threat is noxious weeds. Motorized use represents well known vector for weeds.
495	The Tenderfoot drainage should be non-motorized to prevent further damage from noxious weeds. Motorized vehicles and equipment contribute the most to the introduction and spread of noxious weeds because of size and/or distance of travel within a given time. Weed seeds become stuck in tire tread and in under carriage mud, pulled off and lodged in the framework, drug out upon unloading from passenger and cargo compartments, or deposited with contaminated cargo (e.g. gravel, hay, straw). (page 183, DEIS).
554	ORVs will inevitably spread knapweed throughout the Smith Canyon.
603	as owners of a cabin on the Rocky Mountain Front, west of Augusta. We know first-hand the difficulties associated with controlling the spread of noxious weeds. Although our cabin is on the Front, we do quite a bit of hiking in the surrounding Island ranges, as well. As our own experience underscores, the health of these mostly weed-free forests depend, in part, on actively preventing the potential spread of noxious weeds. Alternative 4 addresses concerns like ours by keeping the hiking trails and wilderness study areas in large, undisturbed blocks.
635	Pilgrim Creek: Riparian damage and the spread of weeds is a problem caused by ORV use. It is beyond dispute that ORV's spread weeds from the roads onto the trails. Studies showing how weeds are spread by OR V's have been ignored by the DEIS in favor of a statement that all uses spread weeds. This statement sidesteps any analysis of the effect of different uses. Weeds spread farther and in greater numbers with ORV's, and the literature supports this statement.
688	Heavy infestations already exist along the Smith River and Tenderfoot Creek. Noxious weeds are evident at access points and along the trails in the Pilgrim Creek roadless area. Other areas such as the Middle Fork of the Judith, upper Deep Creek, and the Hoover Creek are still largely weed free now. Prevention is the cheapest and easiest means to keep areas weed free.

**Summarized Comment:** Motorized vehicles contribute the most to introduction and spread of noxious weeds. Areas of special concern are Pilgrim Creek, Middle Fork Judith, upper Deep Creek, Hoover Creek, Smith Canyon, Tenderfoot, Sawmill Gulch, Dry Fork. Prevention, through restriction of motorized travel, is the least expensive and most effective means to keep areas weed free.

**Response:** All of the alternatives proposed for summer motorized wheeled-vehicle travel restrict cross-country travel. Chapter 1 – Purpose and Need of the FEIS addresses the 2001 Three-State OHV Rule and Forest Plan Amendment 23 which prohibit cross-country wheeled-vehicle travel. Motorized wheeled-vehicle travel off designated system roads and trails for parking or camping would be allowed within 300 feet of the road or trail, unless signed otherwise, as long as five conditions are met. Resource specialists would help determine where this off-route travel would not be appropriate. Motorized travel in areas otherwise closed to motorized use may also be allowed for administrative purposes such as law enforcement, fire, emergencies, military operations, noxious weed control, and other official business purposes and for carrying out the provisions of certain special use permits or other activities such as administration of grazing allotments. All such use would require specific authorization from the appropriate Line Officer or, in the case of grazing permittees, allow restriction in specific locations if resource damage (including spread of weeds) is determined. Cross-country motorized travel where it is not authorized, regardless of the location and vegetation type, is illegal and a law enforcement issue. Snowmobile travel in designated areas on the Jefferson Division would be allowed from December 1 through May 1. Line Officers have authority to issue travel management modifications (area closures) if resource concerns become evident. Various alternatives promote non-motorized foot and horse travel in large blocks of the areas of concern: Pilgrim Creek (A4, A5), Middle Fork Judith (A4), upper Deep Creek (A4), Hoover Creek (A3, A4), Smith River (A5), Tenderfoot (A3, A4, A5), Sawmill Gulch (A3), Dry Fork (None) (DEIS, Chap II).

**Subject Code:** VEGETATION

**Category Code:** 1601 – Noxious weed comments

**Letter #:**  
33

How will the USFS deal with invasive weeds and the resulting impact on wildlife? Through this travel planning process, the USFS should take proactive action to prevent the spread of noxious weeds, especially in the WSA and IRAs. Indeed, weed infestations were not reported in the WSA in 1977 and probably did not exist.

373	Restrict the ATVs and provide washing before and after entry on any roads. Keep large blocks of land for hiking and horseback riding.
621	Noxious Weeds-The DEIS acknowledges that the greatest number of weed infestations are along side roads indicating that motorized travel spreads noxious weeds. It also recognizes that the more motorized travel the higher risk of spreading noxious weeds. But there is no analysis of the mitigation measures necessary for each alternative. Nor is there a cost benefit analysis of the various alternatives.
<b>Summarized Comment:</b> Although the DEIS recognizes motorized travel spreads noxious weeds, it does not adequately analyze cost-benefits of alternatives nor mitigation measures, such as, providing for pre-entry washing, further restriction of motorized travel or other proactive actions to prevent the spread of noxious weeds.	
<b>Response:</b> The Forest does not have sufficient data to attempt a cost-benefit analysis of the various vectors that spread noxious weeds, nor is it believed such specific data can reasonably be collected and evaluated. The DEIS discusses many past and present mitigation measures implemented that will be continued regardless of the alternative selected (DEIS, 182-183, 186-187, Appendix D). The Record of Decision will determine which routes will be part of the Forest's road and trail system, acceptable travel modes by route, seasonal restrictions and possibly additional mitigation measures. The kind and extent of mitigation will continually be adapted to new technologies and circumstances on the ground.	

<b>Subject Code: VEGETATION</b>		<b>Category Code: 1601 – Noxious weed comments</b>
<b>Letter #:</b> 8	Closures due to noxious weed concerns are only placed on motorized recreationists. We have observed an equal amount of noxious weeds in non-motorized areas as there are in motorized areas. We request that the document make a fair evaluation of all sources and uses that contribute to the noxious weed problem including hikers, mountain bikers, equestrians (non-use of weed-free hay), etc. The document should also fairly evaluate how natural processes and wildlife spread noxious weeds.	
659	I am confused on when the FS states that ATV's damage the area and pass noxious weeds. Is there proof of any kind that backs this claim up?	
<b>Summarized Comment:</b> Closures due to noxious weed concerns are unfairly placed only on motorized recreationists and a fair evaluation of the contribution of all sources (uses and natural processes) is requested. Is there proof that ATVs spread noxious weeds more than other uses?		
<b>Response:</b> The Multiple-Use Sustained-Yield Act directs that the national forests be administered for multiple resources in the combination that will best meet the needs of the American people, giving due consideration of the relative values of those resources, without impairment of the productivity of the land (Public Law 86-517, as amended through Public Law 106-580). Evaluation Criteria B (DEIS Appendix C) clearly seeks the “balance of opportunities for different types of uses” while maintaining the productivity of the land through Evaluation Criteria C (Erosion Control), E (Resource Protection) and G (Noxious Weed Spread). Various Orders and Rules attempt to appropriately mitigate the spread of noxious weeds regardless of the type of forest use (e.g., 2001 Three-State OHV Rule; 1997 Weed Free Hay Order).		
A quote from a Montana State University Extension Service publication, Montana Knapweeds: Identification, Biology, and Management: <i>People and their motorized vehicles are a major cause of knapweed spread in Montana. Vehicles driven several feet through a knapweed site can acquire up to 2000 seeds, 200 of which may still be attached after 10 miles of driving. It is imperative to wash the undercarriage of vehicles that have been in weed-infested areas. Dispersal of weed seeds can be minimized by not driving, walking or trailing livestock through weed-infested areas. Only certified weed-seed free seed and hay should be purchased. Livestock should not be grazed in knapweed-infested sites during flowering and seeding, and livestock should be held for seven days before moving to uninfested pastures.</i> See Trunkle, T. and P. Fay. 1991. Transportation of spotted knapweed seeds by vehicles. Proceedings, Montana Weed Control Association Annual Conference. Jan 14-16, Butte, MT. p.33.		

**WATER QUALITY COMMENTS/RESPONSES**

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>
<b>Letter #:</b> 2	Pilgrim Creek - Trail 315 and 314 are in or near the riparian area for almost the entire length of Pilgrim Creek. This trail should remain closed to ATVs to prevent to prevent trail widening and resource damage. Motorcycle use should be closely monitored to prevent resource damage.	
2	Trail 342 Is also contributing a significant amount of silt from numerous stream crossings.	
<b>Summarized Comment:</b> Water Quality, stream crossing		
<b>Response:</b> Water quality issues are discussed on page 199 of the DEIS.		

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>
<b>Letter #:</b> 8	If dispersed camp sites are to be closed based on water quality concerns, then we request that the decision include a water quality monitoring program to establish the baseline water quality prior to the closure of dispersed camp sites and continue that program after the closure to establish whether any significant water quality improvement was realized. The decision should also include a provision to re-open closed camp sites when no significant improvement in water quality was realized by the closure.	
<b>Summarized Comment:</b> Concerned that the FS can not attribute sediment in streams near dispersed campsites to the campsites.		
<b>Response:</b> The Forest has collected stream sediment data on a number of streams in the Jefferson Division. Sediment delivery from campsites with no known buffer to stream courses, as seen on Dry Fork Creek, is well documented.		

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>
<b>Letter #:</b> 15	the DEIS's analysis of impacts to fish and water quality is seriously deficient. It is clear that there have been significant impacts to water quality from OHV use on the Forest. The DEIS claims that these impacts will moderated by OHV route designation, but this reduction in impacts is not quantified or qualified. Most of the Forest Service's claims about improved water quality rely on the assumption that OHV use will be decreased by road closures. But it is clear from the DEIS that those road closures cannot be expected to actually occur.	
<b>Summarized Comment:</b> Concern for the lack of stream studies to quantify the reduction of OHV use would moderate the impacts to streams.		
<b>Response:</b> The Forest has collected stream sediment data on a number of streams in the Jefferson Division. The answers that could be gained from using the existing stream sediment information or modeling to determine natural sediment rates or relative natural sediment rates for streams in this EIS would have a low level of reliability or defensibility. For these reasons the analyses of soils and water resources at the scale of this analysis area are largely limited to indices of measure (miles of roads and trails within 100 feet of perennial streams, GIS indicated stream crossings, miles of roads and trails crossing sensitive soils based on land type information) that have less uncertainty.		

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>
<b>Letter #:</b> 25	Simple application of BMPs which do not achieve Water Quality standards and protect beneficial uses are insufficient to meet state regulations. In order to meet the State law requiring "reasonable soil, land and water conservation practices" additional actions and conservation practices, beyond BMPs to achieve Water Quality Standards and restore beneficial uses, may be necessary. Proposed travel management should also be discussed with any local watershed groups that may be involved in preparing TMDLs and water quality restoration	
<b>Summarized Comment :</b> Concern with the sole use of BMP to meet water quality standards.		
<b>Response:</b> ; The Forest Service does not rely on BMPs alone to protect water quality. A wide variety of goals, objectives and standards and guidelines were developed in the Travel Management Plan to provide high quality water including but not limited standards and guidelines for geology, soils, water, and fisheries. The Lewis and Clark NF have a great deal of data on the effectiveness of BMPs. As shown in the Lewis and Clark National Forest's BMP Monitoring Reports, BMPs have a high attainment for both implementation and effectiveness. The most recent BMP Monitoring Report can be found in Appendix A.		

<b>Subject Code:</b> WATER		<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 27	“sensitive areas ...should remain OHV free. Several wet parks and meadows (such as Oti Park) may be badly damaged if OHV and ATVs....are allowed to pioneer trails in them.	
<b>Summarized Comment:</b> Unauthorized OHV use.		
<b>Response:</b> Direct and indirect impacts to soils from both authorized and unauthorized travel are described in the soils section of the DEIS on pages 172 through 180. Routes lacking an engineering design, use of routes when wet, the continuing impacts to soils from established routes, use of routes by a class of vehicles not considered when the routes were designed or at levels not considered when the routes were designed, sensitive soils, long, continuous steep routes and the low levels of maintenance are important factors considered when describing soil impacts. These factors are considered in the FEIS and reflected in the preferred Alternative.		

<b>Subject Code:</b> WATER		<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 33	OHVs should not be allowed to travel up and down the watershed, churning up Tenderfoot Creek and causing additional water quality/sediment problems in the Smith River watershed.	
<b>Response:</b> The forest service understands the problems of unauthorized OHV use in the Tenderfoot drainage. Smith River is a water quality limited stream and is discussed in detail in Appendix G, page 359 of the DEIS.		

<b>Subject Code:</b> WATER		<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 33	the USFS must also obtain 401 certification from the State of Montana. Indeed, the USFS concedes that its proposed Travel Plan will result in the discharge or runoff of pollutants into the various rivers and streams in the analysis area thereby triggering its 401 and section 313 obligations.	
<b>Response:</b> The permitting process is for “Any person, agency, or entity, either public or private, proposing a project that will result in the discharge or placement of dredged or fill material into waters of the United States."Waters of the United States" include lakes, rivers, streams (including perennial, intermittent, and ephemeral channels with an ordinary high water mark), wetlands, and other aquatic sites.” There is not a permit process for indiscriminant sediment delivery to streams. The Forest Service will and does apply for the appropriate permits (MDEQ 124) for any planned work in or near streams that has the potential to deliver sediment to water ways. Facilities		

<b>Subject Code:</b> WATER		<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 42	Sources of pollutant loading may also occur in unlisted tributaries to listed streams, and TMDLs must account for all sources of pollution, hence there EIS need to also address road related pollution sources in watersheds of 303(d) listed waters.	
<b>Response:</b> General sources of sediment from roads and trails are discussed on pages 199 to 205 of the DEIS. As discussed in the DEIS, roads and trails have resulted in elevated sediment levels where stream channels are confined by fill slopes, when vegetation buffers between roads and streams are no adequate, and at crossing locations. Water Quality Limited Streams (WQLS) are discussed in depth on pages 342 through 346 of Appendix A of the DEIS. Discussion includes the 1996 through 2004 WQLS lists. When the DEIS was written the 2004 list was still in Draft form. The DEIS includes additional discussion of the final 2004 list.		

<b>Subject Code:</b> WATER		<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 42	The Lewis & Clark NF should coordinate their travel management planning within the Montana DEQ as well as EPA TMDL staff to assure travel plan consistency with TMDLs and water quality restoration plans being prepared by MDEQ.	
<b>Response:</b> Done.		

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>	
<b>Letter #:</b> 132	maintaining riparian and aquatic habitat quality: Motorized traffic disturbs more rock, gravel, and dirt than foot and horse travel (per traveler) increasing the erosion of the trail and the suspended load of stream systems, even if the vehicles stay on established trails.		
<b>Response:</b> The impacts from different kinds of trail use is documented on pages 200-201 of the DEIS. As discussed on page 201 of the DEIS, the impacts from different kinds of trail use are not always consistent. Because of their wider tracking width, greater weight and relatively high rate of power OHVs would be ranked higher than hikers with respect to trail damage, but their placement with motorcycles and horses is not so clear.			

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>	
<b>Letter #:</b> 282	Currently there are no trails in this area limited to foot, horse or bicycle use. Daisy and Nevada Narrows, and some of the other canyons are equally as scenic and would have much more of a backcountry feel if motorized vehicle use was limited. These canyons are used extensively by ATV riders and their impact on streambeds, especially in the narrow canyons is significant. increases in erosion and stream crossings (especially along the Middle Fork)OHV S should not be allowed to travel up and down the watershed, churning up Tenderfoot Creek and causing additional water quality/sediment problems in the Smith River watershed.the USFS must also obtain 401 certification from the State of MT. Indeed, the USFS concedes that its proposed Travel Plan will result in the discharge or runoff of pollutants into the various rivers and streams in the analysis area thereby triggering its 401 and section 313 obligations.		
<b>Summarized Comment:</b> Limit ATV access to Tenderfoot, Daisy and Nevada Creek trails.			
<b>Response:</b> New alternative. The permitting process is for “Any person, agency, or entity, either public or private, <b>proposing a project</b> that will result in the discharge or placement of dredged or fill material into waters of the United States. "Waters of the United States" include lakes, rivers, streams (including perennial, intermittent, and ephemeral channels with an ordinary high water mark), wetlands, and other aquatic sites.” There is not a permit process for indiscriminant sediment delivery to streams. The Forest Service will and does apply for the appropriate permits (MDEQ 124) for any planned work in or near streams that has the potential to deliver sediment to water ways. Facilities?			

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>	
<b>Letter #:</b> 282	causing additional water quality/sediment problems in the Smith River watershed.the USFS must also obtain 401 certification from the State of MT. Indeed, the USFS concedes that its proposed Travel Plan will result in the discharge or runoff of pollutants into the various rivers and streams in the analysis area thereby triggering its 401 and section 313 obligations.		
<b>Summarized Comment:</b> Concerned the FS need to obtain proper permits for trails and roads supplying sediment to streams.			
<b>Response:</b> The permitting process is for “Any person, agency, or entity, either public or private, <b>proposing a project</b> that will result in the discharge or placement of dredged or fill material into waters of the United States. "Waters of the United States" include lakes, rivers, streams (including perennial, intermittent, and ephemeral channels with an ordinary high water mark), wetlands, and other aquatic sites.” There is not a permit process for indiscriminant sediment delivery to streams. The Forest Service will and does apply for the appropriate permits (EPA 404 and MDEQ 124) for any planned work in or near streams that has the potential to deliver sediment to streams.			

<b>Subject Code: WATER</b>		<b>Category Code: 1700 – General water quality comments</b>	
<b>Letter #:</b> 313	a FS resource specialist informed me he knew that every creek crossing between crossing 1 (traveling up the creek) and the Middle Fork Ranch had wave effect erosion due to vehicular travel crossing the creek. This is absolutely not true, and I will follow this document with an addendum containing photos documenting my data. Many of the crossings enter and exit the creek on gradual gravel bars with absolutely no erosion concerns. I acknowledge that many of the creek		

	<p>crossings are subject to wave effect erosion. I propose that erosion concerns could be mitigated in each case much more efficiently than E&amp;D and construction of an alternative route down Arch Coulee as proposed by the FS. The resource specialist also argued that the sediment created by the wave effect settled at each crossing and was stirred up by vehicular traffic. I acknowledge that sediment is stirred up by vehicular crossing, but differ in opinion regarding the origin of the sediment and the ease of mitigation. The bullet point below outlines the origin of the sediment. As sediment flows down the creek (the majority originating from Lost Fork), it is natural for the sediment to settle in slow or stagnant portions of the creek. This effect could easily be mitigated through a cooperative effort by adding rock to the crossings to reproduce the original channel and eliminate the slow and stagnant pools and streambank recession. None of the proposed Alternatives analyze this mitigation or the development of a cooperative effort to effect the mitigation. No monitoring data is available to document or substantiate the progression of streambank or channel morphology. A resource specialist argued that all of the sediment present in Middle Fork is due to vehicular traffic. Middle Fork does contain a large amount of sediment, but the large majority is not due to vehicular traffic. Most of the sediment originates in the upper reaches of Lost Fork due to the vast acreages of the watershed consumed by the wildfires over the past 20 years. At the confluence of Lost Fork and Middle Fork, the sediment in Lost Fork Creek is clearly visible as its murky waters flow into Middle Fork. Lost Fork Creek contains absolutely no vehicular travel the creek with no vehicular travel contains a large amount of sediment and the creek with all of the vehicular traffic is crystal clear at that point. The sediment is contributed entirely by the denuded Lost Fork watershed.</p>
	<p><b>Response:</b> Road and trail crossing impacts are discussed in the DEIS on pages 199. In the DEIS, the water quality analysis focused on road and trail crossings where inadequate vegetation buffers exist between the travel way and a stream. This would be areas where the road/trail either crosses the waterway (a ford, bridge or culvert) or is located within 100 feet. It is well documented that forest roads crossings are major sediment sources in forest streams because crossings are focal points of sediment introduction into waterways. (Taylor et al. 1999). Stream surveys of the Middle Fork drainage starting in 1968 have documented the detrimental affects of the fords.)</p>

<b>Subject Code:</b> WATER	<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 429	I very concerned with the shown closure of Tr. #424 and 437. I understand there was a proposed re-routing of the trails in the Middle Fork area to accommodate both motorcycles and ATV s. if the re-routing took place it would solve the two main issues concerning the Middle Fork area; 1) the water quality issue and 2) alleviate the access issue with the private landowners
	<b>Response:</b> Discussion of Alternatives

<b>Subject Code:</b> WATER	<b>Category Code:</b> 1700 – General water quality comments
<b>Letter #:</b> 635	ORV's also destroy stream crossings by breaking down stream banks and causing the crossing to become wider. The pictures in the DEIS tell the tale. Several pictures show ATV's crossing wide streams where the stream banks are broken down. I recognize those streams from hikes, and it is the placement of the trails to accommodate ORV's that have caused the damage. This type of erosion and damage was not adequately analyzed in the DEIS. ORV use in wet areas invariably result in multiple trails to get around the wet spots and churning up the low spots into muddy bogs that are difficult to hike through. ORV's cannot mitigate this damage and the DEIS provides no substantive analysis. With respect to both the winter and summer travel plans, pollution from machines must be addressed but is completely ignored in the DEIS. Oil spills from these machines and hydrocarbons in amounts greater than automobiles spew from exhaust. Creek crossings are impaired. How much pollution will be allowed before water quality suffers?
	<b>Response:</b> Water quality issues are discussed on page 199 of the DEIS.

## WILDLIFE COMMENTS/RESPONSES

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800 – General Wildlife comments</b>
<b>Letter #:</b> 635	The DEIS has no analysis of how low flying aircraft affect wildlife and have no estimates of the number of take-offs and landings.	
<b>Letter #:</b> 33	With respect to the airstrips, how will the authorization of airstrips, including their construction, maintenance, and operation impact big game and other wildlife populations throughout the analysis area? How will the low-level flights, clearing approach ways, mowing and leveling of surfaces, etc ... directly impact wildlife populations?	
<b>Response:</b> The DEIS includes an analysis of loss of elk security habitat with designation of the airstrips under Elk Summer and Fall Ranges (Elk Habitat Effectiveness and Elk Security). The analysis treats the airstrips the same as a road open to motorized activity. As such, a ½ mile buffer was placed around the airstrips and this area was removed from secure elk habitat calculations. The analysis considered any road, trail or airstrip open to motorized activity during the hunting season as contributing to disturbance of elk. The analysis did not consider level of use as that information was not available. Any ground disturbing or vegetation altering activities to construct and maintain the airstrips will be analyzed separately. Neither activity is anticipated at this time.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1801</b>
<b>Letter #:</b> 284	Lynx are not proven to live in or around the Little Belt Mountains according to Page 239. Snow compaction theories are just that THEORIES.	
412	If these areas are being closed because of wolverine/lynx habitat please explain why there has not been any DNA found that proves these animals are present in the Little Belts. I do not see the reasoning behind closing areas off for the habitat of an animal that is not there.	
<b>Response:</b> Page 226 of the DEIS states that “lynx have been documented” in the project area, and that the area is considered to be “secondary habitat”. There are historic records of wolverine and lynx within the project area. Recent sightings have not been documented, nor have recent surveys been conducted.		
Recent studies (Bunnell et al. 2006, Kolbe et al. in press) have looked at the issue of snow compaction in relation to lynx and coyotes. Results of these studies in included in the FEIS, Chapter III.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1804</b>
<b>Letter #:</b> 545	The quality of elk hunting on public lands in the Little Belts has steadily become poorer from the time ATVs have become popular. I feel that ATV use has pressured elk to private security land thus, not providing a satisfactory opportunity to harvest an elk on public lands. Has any kind of survey or analysis been completed within the Little Belts to address elk movements seasonally and how that may be related to ATV use?	
<b>Response:</b> There have been no surveys within the Little Belts that address seasonal elk movements in relation to ATV use. Montana Fish, Wildlife and Parks biologists have expressed concerns that elk are moving from public lands to private lands during the hunting season. The FEIS analyses the amount of elk security habitat during the bow hunting and rifle hunting seasons by alternative. This analysis is based on roads and trails open to motorized activities during the hunting season. ATV use is considered in the analysis.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 9	I also request that more recent elk count data be used. It seems that 20 year old data is not relevant and therefore should not be considered.	
<b>Response:</b> Table III-80 includes the 3-year average population size from the Montana Final Elk Management Plan (MFWP 2005).		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 19	The motorized community is familiar with the studies done by Michael J. Wisdom. We use his documents frequently in support of motorized recreation. We believe an objective evaluation of the complete studies would support the current conditions regarding motorized travel. The DEIS contains pieces of information take in out of context, questions asked without pertinent area information included, and fails to be objective.	
<b>Response:</b> For the FEIS, <i>Wisdom, M.J., technical editor. 2005. The Starkey Project: a synthesis of long-term studies of elk and mule deer. Alliance Communications Group, Lawrence, Kansas, USA.</i> was reviewed. This publication summarizes the work of Michael Wisdom completed at the Starkey Experimental Forest. The literature cited section of the FEIS lists the complete body of literature reviewed for information on the effects of motorized recreation on wildlife. Additional information is included in the FEIS, Chapter III, Wildlife Section.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 34	MWF'S hunters and anglers requested an analysis of how the Travel Plan will affect elk security, migrations routes, and a road density analysis. Montana sportsmen need to know how this Plan fit into FWP's Elk Management Plan goals. Although some information is available in the document, it would appear to inadequately coordinate how they relate to each other.	
<b>Response:</b> The FEIS includes a road density analysis in comparison to the Forest Plan Standards; an analysis of habitat effectiveness based on road and trail densities; and an analysis of elk security. Migration routes for elk and deer are not identified in the Lewis and Clark National Forest, and the effects on migration were not identified as an issue for this project.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 27	<p>The Department believes that the 1997 winter range and calving information that was used in the analysis needs to be updated in areas</p> <p>collaborative efforts by FWP and USFS biologists to map big game winter range, calving and/or security areas. It then states that the latest mapping update of elk and mule deer winter ranges/calving areas occurred in 1997 based on local knowledge of area biologists as defined in Map II. Map 11 does not indicate elk calving use in the Ming Coulee, Belt Park, lower Tenderfoot and Tiger Butte private land areas of HD 413. Elk utilize these areas throughout the year. The map does not indicate elk winter range in the Belt Park, Ming Coulee, Tiger Butte and lower Tenderfoot Creek areas. Over the past few years, elk have readily utilized these areas as winter range. As mentioned, FWP and USFS biologists have met to discuss these topics many times over the past three years and have constructed updated versions of Map 11, which were not utilized in the draft EIS. If "new" data is available for big game use in these areas, why is it not addressed in the draft EIS and used in the travel planning process?</p> <p>Routes #694, #694-A, # 15929 and #15933 in the Pasture Gulch area could all be left open year round for motorized use, except for a recommended 5-15-6/30 closure for elk calving. This area was in the past mapped as winter range; however, feel that this area is probably not winter range at least for elk. Would recommend modifying the map to show only that area south of Green Canyon and Whetstone Ridge as being winter range in this area. Having the Pasture Gulch area open during the winter would also facilitate additional access for mountain lion hunters in the Castles during the winter.</p>	
<b>Letter #:</b> 510	I have observed that more and more elk are changing their calving areas from forest lands to private lands the last 4 or 5 years	
<b>Response:</b> The analysis in the DEIS relied upon the 1997 map of winter ranges and calving areas. Montana's Department of Fish, Wildlife and Parks biologists provided updated information on winter range and calving areas based on their observations over the last several years. This additional information was included in the wildlife section, existing condition of Chapter III of the FEIS.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 27	If an analysis of the habitat effectiveness of the area along the boundary of the Forest Service from the Dry Fork of Daisy Dean Creek to Antelope Creek and two miles deep from the Forest Service Boundary were done, we would surely find that habitat effectiveness was much below 50%. It appears that by measuring habitat effectiveness for the entire hunting district the problems that exist along the boundary of the Forest Service were masked. In our opinion additional restrictions made on roads and trails in the boundary area should include closure during the summer months, prior to the onset of the archery season	
<b>Response:</b> The analysis of habitat effectiveness was completed based on hunting district boundaries. Guidelines for habitat effectiveness in the Forest Plan is to maintain 50% habitat effectiveness in areas where elk are one of the primary resource considerations and 70% habitat effectiveness in areas intended to benefit elk summer range and retain high use. In the FEIS an additional analysis of habitat effectiveness by watershed (sixth hydrologic unit code) is reported and displayed on Maps 21 - 24.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1800</b>
<b>Letter #:</b> 27	Opposed to airstrip in the Middle Fork/Cleveland Creek area. The airstrip, besides creating potential conflicts with other uses of the area, would require the removal of FWP's livestock grazing enclosure in this area. The enclosure has been in existence for 20+ years. Removal of the enclosure would result in lost ability to demonstrate what the potential vegetation community might look like in the absence of livestock grazing	
<b>Response:</b> Information regarding the location of the livestock grazing enclosure is included in the FEIS.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1801</b>
<b>Letter #:</b> 8	A lynx study completed in the Seeley Lake area found no adverse impact to Lynx from winter snowmobile use. The result of this study and the data that was collected must be used to evaluating areas open and closed to snowmobiles. The closure of any area because of winter motorized impact to lynx is not valid and, therefore, must not be used to initiate closures.	
9	A lynx study was completed in the Seely Lake area that showed no adverse impact to Lynx from winter snowmobile use. The results of this study and the true data that was collected must be used in evaluating areas open or closed to snowmobiles. The closure of any area because of winter motorized impact to lynx is not valid and therefore must not be used to initiate closures.	
<b>Letter #:</b> 38	In your winter alternative, you utilize a Lynx study on snow compaction in relation to Wolverine habitat. First, the study you refer to does not have conclusive evidence that snowmobile tracks affect the Lynx. Thus it is an unproven theory. Managing our public lands by theory to protect habitat is just as dangerous as managing it by theories that support resource proliferation. Manage by proven theories or in other words, facts.	
<b>Response:</b> The results of the Seeley Lake study (Kolbe et al. in press), as well as other recent work (Bunnell et al. 2006) has been included in Chapter III of the FEIS.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1801</b>
<b>Letter #:</b> 19	The lack of objective evaluation is evident in this section. The reports, studies and maps by the US Fish & Wildlife Service for the Mountain-Prairie Region, Endangered Species Program, Unit 3, does not show the areas addressed in the DEIS as critical habitat for the lynx.	
<b>Response:</b> The DEIS does not identify any areas of critical habitat for lynx. The DEIS identifies the project area as secondary habitat. The FEIS identifies the project area as unoccupied, secondary habitat; following the recently released Northern Rockies Lynx Amendment (USDA 2007).		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1802</b>
<b>Letter #:</b> 8	There is no documentation or data to support closure of any motorized routes in the project area to improve wildlife connectivity. The existing level of roads and trails does not significantly impact wildlife connectivity, i.e. it functions as such with the existing level of roads and trails and closing any roads or trails to motorized use would not make any measurable difference. Non-motorized routes would have the same impact on wildlife connectivity as motorized routes and the evaluation must recognize this fact.	

**Response:** Wildlife connectivity was not identified as an issue and was not analyzed in the FEIS. The Biological Evaluation, Biological Assessment, and Wildlife/Management Indicator Species Report, located in the project file, include analyses of habitat connectivity in relation to the Travel Plan.

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1802</b>
<b>Letter #:</b> 27	A portion of HD 413/416 that has good elk habitat but is compromised by motorized trail use is the Packsaddle, Fisher and Rugby Creek areas. current observed elk populations and elk population objectives as mentioned in the FWP Elk Management Plan should have been identified by Hunting District and incorporated in travel plan analysis. Increased security via travel plan alterations doesn't always mean increased elk use, if quality habitat doesn't exist.	
<b><u>Response:</u></b> Table III-80 summarizes population objectives and observed numbers from the 2005 MT FWP Elk Management Plan. This information was used during analysis.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1803</b>
<b>Letter #:</b> 33	<p>The DEIS is void of an assessment on threatened and endangered species. - the USFS needs to comply with NEPA. 'At a minimum, this means: (1) taking the hard look at how the alternatives may directly, indirectly, and cumulatively impact threatened and endangered species in the analysis area; and (2) making sure that this analysis is included in the DEIS mid available for public review, comment, and scrutiny.</p> <p>USFS is also required to monitor for MIS as outlined in Chapter V of the Forest Plan (Monitoring Plan). In adopting the Travel Plan, how will the USFS comply with these monitoring requirements? It is not enough to use population and habitat data for one MIS elk as a means of monitoring for a range of other MIS such as bobcat, black bear, and mule deer.</p> <p>the USFS needs to: (1) determine the amount and distribution of habitat in the National Forest needed to maintain viable populations of the MIS; and (2) accurately document the actual" existence and trend of the habitat within the National Forest. Accurate habitat data is imperative to using this proxy on proxy approach. Indeed, without such data. The USFS cannot reasonably ensure that is managing for viable populations of MIS. Here, the USFS is failing to comply with its MIS obligations by: (1) failing to reasonably ensure that it is managing for viable populations of all MIS; and (2) using one MIS as yet another proxy or surrogate for other MIS. In fact, pursuant to the Forest Plan, the USFS is to "monitor population levels for all Management Indicator Species on the Forest and determine the relationship of habitat trends.</p> <p>In the DEIS, the USFS only discusses the impacts (direct, indirect, and cumulative) on a few species: Canada elk, mule deer, wolverine, and westslope cutthroat trout. See DEIS at 224. What about the other wildlife species in the analysis area? Why is "no further analysis" being completed? What about the other, approximately 31 species that are listed as either threatened or endangered, candidate species, management indicator species (MIS), sensitive species, or species of concern? Under NEPA, the DEIS needs to assess the impacts of the proposed Travel Plan on all wildlife species in the analysis area and this information needs to be included in the DEIS. In addition, preparing a separate Biological Assessment (BA) and/or Biological Evaluation for listed or candidate species does not suffice. This information needs to be included in the DEIS and submitted for public review and comment. The USFS must actually assess the impacts in the DEIS. How will the new transportation system (i.e., roads, trails, open areas, and airstrips) directly impact the region's wildlife populations and habitat?</p>	
<b><u>Response:</u></b> The project file includes the Biological Evaluation, Biological Assessment, and Wildlife/Management Indicator Species Report. These documents analyze the effects of the Little Belt, Castle and Crazy Mountain Travel Plan on Threatened, Endangered, Sensitive and Management Indicator Species located on the Lewis and Clark National Forest. Table III-76 summarizes the rationale for the species analyzed, and the determination of effects from the Biological Evaluation and Biological Assessments.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1803</b>
<b>Letter #:</b> 9	Because of the true science that has been gathered by this study on the bears in the Swan valley, I request that the FS discard the original "road density guidelines" and initiate new guidelines that reflect that habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by mere predictions and assumptions must be used when true science and actual data is available.	
<b>Response:</b> Bears in the Swan Valley are grizzly bears, which do not occur in this project area. Road density guidelines are dictated by the Lewis and Clark Forest Plan, as analyzed in the DEIS.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1803</b>
<b>Letter #:</b> 27	USFS's effects analysis on wolverines, which is a furbearer managed by the Department, has raised concerns regarding the potential impact to wolverines from winter travel in a few areas as proposed under the different winter travel alternatives.	
<b>Response:</b> The impact on wolverines is analyzed in the FEIS (Wildlife Section, Chapter III) based upon potential wolverine denning habitat. Potential wolverine denning habitat was mapped, and activities within 1 km of the habitat were analyzed. The effects are displayed in the FEIS.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1804</b>
<b>Letter #:</b> 41	the effects of noise on mammalian endocrine disruption were not mentioned.	
<b>Response:</b> Information on endocrine disruption, as reported in Creel et al. (2002) are included in the FEIS (Wildlife Section, Chapter III).		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1804</b>
<b>Letter #:</b> 8	the encroachment of residences into the forest is often the most significant factor contributing to the loss of summer and/or winter wildlife habitat. First, we request that the impact of these permanent encroachments be qualified and compared to the relatively minor impact that mechanized forest visitors have on wildlife habitat.	
<b>Response:</b> The Forest Service does not control the development of private land inholdings within the forest boundary. A short discussion of this impact is included in the cumulative effects section.		

<b>Subject Code: WILDLIFE</b>		<b>Category Code: 1804</b>
<b>Letter #:</b> 33	Noticeably missing from the DEIS is an adequate analysis of the noise impacts on wildlife. There are a number of activities that are having an impact on the region's fish and wildlife, all of these activities need to be analyzed in the DEIS' cumulative impacts analysis. How will the authorization of motorized trails, back country airstrips, private land development, timber harvesting, livestock grazing, and other state, private, and federal activities taking place in the Little Belts, Caste. And North Crazy Mountains impact the long-term health of wildlife populations including lynx and big game populations?	
<b>Response:</b> Noise was not identified as an issue in the EIS analysis. The effects of noise are considered in the Biological Evaluation, Biological Assessment, and Wildlife/Management Indicator Species Reports that can be found in the project file.		