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Forest Plan Comments
Beaverhead Deerlodge National Forest
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To Whomever It May Concern:

This document constitutes the comments on the BDNF FEIS for the Forest Plan Revision issued for public comment in February 2008 from the Bitterroot Ridgerunners Snowmobile Club¹ (BRR). We request that this document and the accompanying maps be made part of the public record for the Plan Revision process.

INTRODUCTION

The BRR is a group of about 250 members most of whom live in Ravalli County. We have an active grooming program which extends into the BDNF. Many of our members routinely access snowmobile recreational areas in The Big Hole, Pioneers, Upper Rock Creek and Pintlar areas in the BDNF. We advocate for the responsible and safe operation of over-snow activities. Many of our groomed trails are shared with "skate skiers" some of whom are members of our organization. Most of our groomed trails provide access to the Sapphire Crest. Because of its elevation, favorable snow conditions and topography, the Sapphire Crest provides world-class opportunities for low-impact snowmobile recreation.

We would like to take this opportunity to apologize in advance if some of our comments contained herein have been addressed in the Forest Plan and FEIS documentation. The voluminous nature of these documents and maps quite simply preclude thorough analysis by ordinary citizens or volunteer organizations such as the BRR. Indeed, we cannot even view many of the maps provided on the Forest Plan Revision CD because they crash ordinary home computers. In contrast, many environmental groups employ full-time paid staffs who attend meetings, write exhaustive comments and pursue litigation. It is our opinion that these powerful and litigious environmental groups have disproportionate influence on the construction of these voluminous and detailed plans and should by no means be considered to represent the will of the public. It is our hope that BDNF leadership will recognize that local all-volunteer groups such as ours are put at a disadvantage by this voluminous approach to developing Forest Plans and give our

¹ The BRR is a member of the Montana Snowmobile Association, the Treasure State Alliance and The Blueribbon Coalition

comments thoughtful consideration. Quite frankly, the Alternatives proposed in the Proposed Plan Revision do not give us a great deal of confidence on this issue.

ISSUES

Recreational Use of Forest Lands

The BDNF FEIS rightly recognizes that recreational uses of Forest Lands is increasing, and references selected results from the BDNF NVUM surveys to document this growth. The FEIS does not, however, recognize the very low use rates for existing Designated Wilderness Areas in Western Montana Forests. Yet the Recommended Alternative includes the addition of 329,000 acres of defacto Wilderness.

Regionally, 20% of all Region 1 Forests are already Designated Wilderness areas, yet fewer than 4% of all Forest visitors access Designated Wilderness². Similar results are reported for the BDNF where 7% of the Forest is already Designated Wilderness with a 0.6% Wilderness visitation rate. Moreover, the public has clearly demonstrated, through their elected representatives in Congress, that no additional Wilderness Areas are desirable³. The BDNF should explicitly recognize the low usage rates of Wilderness Areas in the FEIS and justify the creation of additional defacto Wilderness Areas. Recognition of the public will, as expressed through the inaction of Congress, should also be recognized as valid public input to Forest Plan decisions in the FEIS.

The BDNF has estimated the rate of growth of recreational visits to the Forest at 1% per year over the lifetime of the Revised Plan. This may be a reasonable estimate for all Forest visitors, but the FEIS completely neglects to recognize that the growth rate for the use of snowmobiles is far greater than 1% per year. In Montana, the rate of snowmobile usage is estimated by the Montana Snowmobile Association at 8%-10% per year⁴. In Ravalli County, we estimate the snowmobile growth rate to be about 15% per year⁵, probably due to the high growth rate of the county as well as the increase in popularity of the sport. Yet the BDNF Preferred Alternative proposes to reduce areas available for snowmobile activities by 144%. The FEIS must explicitly recognize that snowmobile usage is increasing at a rate ten times greater than other recreational activities. The FEIS must analyze in detail the negative environmental, social, and economic impacts of crowding this rapidly growing population of Forest users into increasingly smaller and smaller areas. No such analysis is contained in the current version of the FEIS or Forest Plan.

Wildland Fires

According to ex-Chief Bosworth, the greatest threat to our Forest lands is the increase in large, unnatural intense wildfires. These firestorms cause more damage to Forest lands, air and water quality and wildlife habitat – by several orders of magnitude – than any human activity on the Forest. And these intense wildfires are increasing at an alarming rate⁶.

² Data are taken from “Round One” of the NVUM program covering the time period 2000-2003. Available at www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf.

³ Congress has steadfastly refused to designate any additional Wilderness Areas in Montana for the past 25 years in spite of persistent efforts by environmental groups.

⁴ Personal communication with Ronda Carpenter-Wiggers, January 2008.

⁵ Personal communication with Susan Roberts, Helena Title & Registration Bureau, January 2008

⁶ D. T. Thompson, “Analysis of Fire Season Data on the Bitterroot National Forest”, 2008, personal communication

The BDNF FEIS does not adequately address this issue. Fuel reduction and thinning projects mitigate the conditions which promote intense wildfires. Setting aside vast areas of the Forest as Recommended Wilderness limits our ability to accomplish large-scale fuel reduction and thinning projects. Given the critical importance of the wildland fire issue, the environmental, social, and economic impacts of limiting our abilities to perform fuel reduction and thinning projects must be explicitly addressed in the FEIS.

RWAs and WSAs

Federal statute requires that roads, trails, and areas which pre-exist the designation of Recommended Wilderness Areas and Wilderness Study Areas be permitted to continue until such time as Congress approves these areas as Designated Wilderness. The statutes governing the management of these areas explicitly forbid the creation of new roads and trails. The only circumstance that permits the Forest Service to close a particular pre-existing road, trail, or area is if the Forest Service can scientifically and unambiguously demonstrate that continued use will result in permanent degradation of the RWA or WSA wilderness characteristics that existed when the RWA or WSA was created.

The BDNF FEIS institutes a policy of blanket closures to all motorized activities in RWAs and closes many pre-existing areas and routes in RWAs without any site-specific justification at all. This policy is unlawful, arbitrary, and capricious. BRR will not accept any road, trail, or area closures on this unlawful basis.

A more detailed discussion of the Sapphire WSA and Stony RWA is provided below.

B-D Partnership

The BRR do not subscribe to the so-called B-D Partnership agreement. Moreover, we urge the BDNF to view this agreement for what it is: A self-serving agreement among two timber companies and two environmental groups which was consummated without any input from recreational groups or state and county governmental entities. The “Partnership” does not represent a broad-based coalition by any stretch of the imagination, and their input to the Revised Plan and should not be weighted as such.

Some Federal and State officials have touted the B-D Partnership as a “break through” towards the ability of competing interests to “collaborate” towards the resolution of conflicts. It is our hope and expectation that the BDNF will see through the hype and treat the B-D Partnership for what it really is: A self-serving agreement among a small group of special interests without regard to the environmental, social, or economic consequences of the agreement.

Resource and Wildlife Impacts

There is no human activity in the Forest which has less impact on Forest resources than over-snow travel. When the snow melts, there is virtually no evidence that snowmobile activity has occurred in an area, trail, or road. We believe that this repeatedly-demonstrated fact should be explicitly stated in the BDNF Forest Plan Revision and FEIS and should be used as justification for keeping existing snowmobile roads, trails and areas open for over-snow travel.

The Preferred Alternative of the BDNF FEIS represents an enormous closure (144% over the existing condition). In most cases the Forest justifies these closures on the presumed impact that snowmobile travel may have on wildlife. Existing scientific

investigations on the cause and effect relationship between snowmobiles and wildlife arrive at widely divergent outcomes. Standard and accepted scientific methodology concludes that, when the results of independent scientific studies arrive at inconsistent results, that it is probable that the cause/effect being studied is small in comparison to other, more dominant factors. In the case of snowmobile/wildlife interactions, these more dominant factors include climate, food availability, time of the year, and degree to which wildlife has become habituated to snowmobiles. NEPA requires that the BDNF demonstrate a scientifically sound foundation for the claim that snowmobiles have adverse impacts on wildlife, yet no such foundation is demonstrated in the FEIS. Given that the cause/effect relationships between wildlife impacts and snowmobile operation are tenuous at best, the BDNF eagerness to accept conservationists' claims to the contrary is startling, and could be construed as a predisposition on the part of the Forest to pursue an exclusionary agenda for snowmobile operation on the BDNF.

In general, winter habitat for ungulates occurs in mid to low elevations where food is more readily available. In contrast, snowmobile operators prefer to visit high alpine environments because that is where the best and most enjoyable snow conditions exist. All elk, deer, and sheep as well as most moose, retreat to lower elevations during the winter simply because it is difficult for them "to make a living" at higher elevations in deep snow conditions. Even the hardy mountain goat retreats to mid elevations during the winter and prefers clear, windswept ridges to the deep snow necessary for snowmobile operation. In short, winter habitat for wildlife and conditions necessary for enjoyable snowmobile operation are virtually mutually exclusive. Snowmobile area closures proposed in the Preferred Alternative of the FEIS to protect wildlife winter range fail to recognize this fact.

To be sure, access to alpine areas for snowmobiles must necessarily pass through winter range at lower elevations. This is most usually accomplished by travel on roads and trails to access higher elevations. Examples of these access routes are the Skalkaho road, the Skalkaho-Rye road and FS80 into the Frogpond Basin. In many cases, these access routes are groomed during the winter snowmobile season. Snowmobilers have little tendency to "play" off these routes at lower elevations simply because they are interested in accessing the higher elevations that present the best snow conditions. We submit that these access routes pose little threat to winter range habitats.

We are particularly distressed that BDNF insists on using the wolverine as an indicator species in spite of FWP's objections documented in the FEIS⁷. Using a species for which no baseline data exist as an indicator species is in blatant violation of sound scientific practices. This whole line of argument should be eliminated from the FEIS altogether.

The Sapphire Crest is currently described as an uninhabited area for Canada Lynx. Closing any area of the Sapphire Crest on the basis of assumed disturbance by snowmobiles for a species that does not exist in the area is patently ludicrous. Indeed, snowmobile closures are recommended in other areas of the BDNF based upon vague and unsubstantiated reports of "sightings" of Canada Lynx. Whose "sightings"? Are they independently confirmed? Do good baseline data exist? Are the impacts of

⁷ Page 896 and 922, FEIS
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snowmobile operation on Canada Lynx unambiguously determined by multiple independent unbiased scientific studies?

Virtually all Montana hunting districts have met or exceeded their management objectives. This would imply that no further restrictions are needed to meet wildlife management objectives, yet the FEIS calls for massive snowmobile closures to further “protect” wildlife. This inconsistency must be addressed in the FEIS.

When it is necessary to do so, there are many ways to manage wildlife populations. Seasonal road closures are very effective at limiting access during hunting season while at the same time providing access during the rest of the year. Regulation of season limits, the establishment of quotas, either sex opportunities, etc. are proven, successful strategies for game management. Yet the BDNF repeatedly chooses complete year-round closure to all motorized access as the only viable option for managing wildlife. We view this choice as a clear predisposed bias to pursue an exclusionary agenda by the BDNF.

Alternative 6 of the FEIS proposes to close 1,311,960 acres of the BDNF to winter travel largely on the basis of supposed impacts to wildlife! NEPA requires that these closures be justified in the FEIS using sound, proven, documented scientific methodology and observations. We find the BDNF to be spectacularly deficient in this respect. We recommend in the strongest possible terms that these closures be re-evaluated for their scientific validity. Failure to do so could be interpreted as a predisposed bias on the part of the BDNF and could lead to legal challenges to the Forest Plan.

User Conflicts

In the BDNF FEIS for the Revised Forest Plan, many references are made to the supposed conflicts between snowmobiles and cross country skiers. We do not perceive any such conflict, and the FEIS fails to provide documentation for these supposed conflicts.

Members of the BRR have never, ever, encountered a cross country skier⁸ or snowshoer on the Sapphire Crest. So where’s the conflict? More to the NEPA point, where is the documentation for the conflict?

We are sympathetic to complaints by cross country skiers about lack of access to alpine elevations. BRR would support any reasonable proposal that would enable cross country skiers improved access to high elevation snow conditions. In general, this is an issue of the availability of maintained state or county roads which access high elevation areas and does not constitute user conflict. Indeed, both the Lost Trail and Pioneer Mountain areas are ideal demonstrations that cross country skiers and snowmobilers can share areas without conflict.

The BDNF FEIS closes many areas to snowmobile travel on the basis of “user conflict” or the need to provide more space for winter “quiet use”. We flatly reject the validity of these arguments. NEPA policies require that closures based on these arguments be substantiated in the FEIS, yet no such documentation is provided. Failure to modify

⁸ There is one historical exception to this statement: There is a “skate skier” – an amazing athlete – who occasionally skis to Skalkaho Pass on our groomed trail. On occasion, this individual has challenged (in jest, of course) our groomer operators to a race to the Pass.

snowmobile closures that are recommended on this basis indicates a predisposition on the part of BDNF to pursue an exclusionary agenda without justification.

The Sapphire Crest

The Sapphire Crest has been used by snowmobilers for at least forty years. This area is shown on the attached map. Snowmobile enthusiasts access the Sapphire Crest from both the Bitterroot and Philipsburg side of the Crest. Portions of the area lie in the BDNF as well as in the Bitterroot National Forest. Because of the consistently favorable snow conditions along the Sapphire Crest, it is a world-class snowmobile opportunity and used by thousands of snowmobile recreationists.

Table 1 documents snowmobile use along the Sapphire Crest⁹ and identifies various

Access Route	Weekly Visits
Bitterroot Skalkaho	400
Philipsburg Skalkaho	50
South Fork Skalkaho	100
Rye Creek	75
Moose Lake/Copper Creek	75
Total Weekly Visits	700

Table 1. Estimated Snowmobile Use For The Sapphire Crest

access points to the area. During the 16 week season from Dec. 1 through April 1, these estimates indicate that approximately 11,400 snowmobiles access various portions of the Sapphire Crest from the Anaconda-Pintlar Wilderness boundary to Dome Shaped Mountain every year!!

BRR is emphatically opposed to the establishment of the Stony Recommended Wilderness Area. The Stony RWA would close areas along the Sapphire Crest to snowmobile travel that have been in continual use for decades. The heavy use of the area by snowmobiles in and of itself make the area unsuitable for Wilderness designation. This heavy use is acknowledged in the rating for the area¹⁰ but does not seem to have affected the suitability rating!! Given the heavy existing snowmobile use and the low visitation rates for Wilderness, we believe that both the “Availability” and “Need” components of the suitability rating for this area should be low¹¹. The identification of Stony RWA seems to have been heavily influenced by the fact that similar adjacent areas on the Lolo and Bitterroot Forests are also including portions of a Stony RWA. We would like to point out that user groups are active in their opposition to the Stony RWA in all three forests. The Bitterroot portion of the Stony RWA in particular is not likely to survive.

⁹ Usage estimates for the Bitterroot Skalkaho and South Fork Skalkaho are based upon counters. Usage rates for the other access points are based upon interviews with Bill Sprauer, Chad Gochenour, Bill Antonioli, BRR members, and other user interviews.

¹⁰ Appendix C, page 150 of the FEIS

¹¹ In Appendix C, page 151 of the FEIS, under the “needs” component, it is stated “Wilderness recommendation for Stony Mountain has support from the public and the adjacent National Forest managers.” This recommendation does not have support from the public; It has support from the Montana Wilderness Association who decidedly do not speak for the public.

BRR are unalterably opposed to closure of any portion of the Sapphire WSA to snowmobile travel. The BDNF does not demonstrate any degradation of wilderness character since 1977 as a result of snowmobile use as required by the 1977 Montana Wilderness Study Act. Much of the Sapphire WSA is highly desirable “habitat” for snowmobiles and should not be closed under any circumstance.

The attached map shows the areas along the Sapphire Crest which have historically and traditionally been used for snowmobile travel. BRR will actively stand in opposition to any Alternative which closes any portion of these highly valued areas.

EVALUATION OF ALTERNATIVES

Alternative 1

Being the “Existing Condition” there is little to be said about this Alternative. We would point out an apparent error in the Table on page 17 of the Executive Summary in describing “Road and Trail Miles Closed to Summer Travel”. In the existing condition, many roads and trails are closed to summer travel, including decommissioned roads. These numbers should be shown in order for the public to properly judge the cumulative impacts of past road and trail closures.

Alternative 2

This Alternative incorporates a modest increase in Recommended Wilderness and makes a rearrangement of these areas along the west side of the Big Hole. BRR could probably live with this Alternative provided the RWAs are not closed to winter motorized travel.

Alternative 3

This Alternative represents the “green” agenda in its entirety and completely totally unacceptable to BRR.

Alternative 4

This Alternative is put forward by the BDNF as the most friendly proposal for multiple use proponents, yet it represents a loss to nearly all multiple uses on the Forest (24% reduction for summer motorized, 28% reduction in areas suitable for timber harvest, etc.). NEPA requires that the Forest present a “reasonable range” of alternatives for public comment, yet all of the Alternatives presented represent a loss for proponents for multiple use. We recognize that “reasonable range” means different things to different people, but the fact that no alternative is multiple use friendly clearly indicates a predisposition on the part of the BDNF to pursue an exclusionary agenda. This is a violation of the intent of NEPA policy.

Nevertheless, Alternative 4 is by far the most acceptable Alternative available from the point of view of snowmobile use on the Forest and BRR supports this Alternative.

Unfortunately, conservation interests will view Alternative 4 as a loss since existing Recommended Wilderness Areas are not included in this Alternative. Conservationists will not accept this Alternative under any circumstances. Any hope of making Alternative 4 mutually acceptable to all interested parties has been sabotaged by the elimination of existing Recommended Wilderness Areas.

Alternative 5

BRR cannot support and will actively oppose Alternative 5 simply because it proposes a massive closure (37% of the Forest) for over-snow travel without any reasonable justification.

Alternative 6

BRR under no circumstance will support Alternative 6. Closing 39% of the Forest to snowmobile use without plausible justification is inconceivable. We will not accept the Stony RWA nor any closure of any portion of the Sapphire WSA. If the BDNF is intent on inviting lawsuits, Alternatives 5 and 6 will accomplish that objective.

RECOMMENDATIONS

The BDNF FEIS must recognize and incorporate the following realities:

- Snowmobile use in the Forest has virtually no impact on the resource
- There are very few conflicts between snowmobile users and skiers or snowshoers; in general alpine areas preferred by snowmobiles are not accessible to skiers; any conflicts that may exist should be resolved on a site specific basis
- Areas identified as wildlife winter range are not the same areas preferred for snowmobile operation
- The science establishing a cause/effect relationship between the operation of snowmobiles and wildlife disturbance is not definitive; such a relationship must be unambiguously established before area closures to snowmobiles can be justified
- The rapid growth rate of snowmobile activity must be explicitly recognized in the FEIS; analysis, by Alternative, of how the BDNF proposes to accommodate this growth rate must be provided in the FEIS
- Congruence between the Recreational Opportunity Spectrum (ROS) and existing and projected recreational use of the Forest must be established, by Alternative, in the FEIS; the existing FEIS fails miserably to do so
- The BDNF must explicitly account for the environmental, social, and economic impacts of the increasing frequency and intensity of wildfires; the Forest's ability to deal with this critical issue must be evaluated by Alternative in the FEIS

BRR believes that it is desirable and necessary for the BDNF to develop an Alternative which largely represents a “no net loss” for both multiple use proponents and conservationists. Failure to do so will inexorably lead to a multitude of appeals and lawsuits which will, ultimately, be detrimental to all concerned.

BRR believes that Alternative 4 could be modified to represent a reasonable compromise. There certainly is no reason why existing RWA areas should not be included in this Alternative and modest additional high priority RWAs added, provided existing uses of these areas is allowed to continue (no defacto Wilderness).

Even Alternative 2 could likely be crafted into an acceptable compromise. The obstacle in Alternative 2 for motorized users is the creation of defacto Wilderness. We generally have modest objections to the establishment of RWAs provided existing uses be allowed to continue in these areas.

It is BRR's impression that the BDNF Revised Forest Plan has been inappropriately influenced by the Montana Wilderness Association, the so-called B-D Partnership, and a predisposed bias on the part of the Forest at the expense of the overwhelming majority of Forest recreational users. We urge the BDNF, in the strongest possible terms, to re-evaluate their position and develop a Plan that better balances the needs of the public and the interests of conservation organizations.

Respectfully Submitted,

The Bitterroot Ridgerunners Snowmobile Club Board
Richard Peters, President

Kirk Nickish, Vice President

Pam Cooper, Treasurer

Betty Frost, Secretary

Dennis Wessels, Director

Russ Englund, Director

Brent Nelson, Director

Enclosures: Maps (Map is not enclosed with email responses but will be sent upon request)

Cc: -Representative, Dennis Rehberg, dustin.frost@mail.house.gov
-Treasure State Alliance, MtSnowman@snowtana.com
-MSA, rondawigggers@bresnan.net
-Citizens for Balanced Use, Autodoc@theglobal.net
-Senator, Max Baucus, 1821 S. Ave. W., Missoula, MT 59801
-Senator, Jon Tester, 116 W. Front St., Missoula, MT 59802
-Blue Ribbon Coalition, Mr. Hawthorne, 4555 Burley Dr, Suite A, Pocatello, ID 83202