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Thank you for allowing us the opportunity to comment on the Beaverhead Deerlodge National Forest (BDNF) Final Environmental Impact Statement (FEIS).

The Snowmobile Alliance of Western States (SAWS) has obtained information regarding the BDNF plan revision through the BDNF website, <http://www.fs.fed.us/r1/b-d/forest-plan/> various available documents with regard to the BDNF plan revision process, through contact with FS staff by phone or e-mail and through public meetings sponsored by various organizations.

The Forest Service (FS) preferred alternative 6 is focused on watershed and fisheries restoration. The FS has closed down general public access to a number of popular areas commonly accessed for not only snowmobiling, but also many other forms of motorized and mechanized activities.

All alternatives considered by the Forest Service include the elimination of existing motorized and mechanized access in recommended wilderness areas. There appears to be a method of designating de-facto wilderness that is falling outside of the lines of the Forest Service Handbook (FSH) and also the Forest Service Manual (FSM).

In announcing that the BDNF FEIS (Alternative 6) was available for public review and comment, the Region 1 Director announced designation of an additional 81,000 acres of recommended wilderness pushing the total of new recommended wilderness areas to 329,000 acres. This is more than was either in the Alternative 2 (initial preferred alternative and public comment period) or Alternative 5 (last preferred alternative and public comment period). It is very evident that the

motorized and mechanized users of this forest have not been recognized by the FS as a user group during either of the previous comment periods. It was also mentioned in the news release that the FS recognizes that there is existing ATV use in the Stony recommended wilderness area but that the area will still be recommended for wilderness regardless of that fact. Snowmobile use was not mentioned at all but does exist in this area. It is also worth noting that when the Forest Service user group study inventory occurred, it was over a period of time including significant blocks of seasonal motorized access times in which the BDNF was actually closed to motorized use due to forest fires. Snowmobile use was less than usual during the timeframe due to low precipitation and minimal snow levels in areas accessed by those collecting the data for the “use” criteria.*

In the BDNF revision the forest plan has recommended so many wilderness areas and non-motorized areas that they have taken on the appearance of a connect the dot pattern along the entire western Montana border areas of the BDNF and many areas within the forest. SAWS is not opposed to the existing wilderness in Montana but we believe there is sufficient wilderness and wilderness\parks in Montana to meet the needs of the public that choose to recreate in wilderness areas. In all, this area totals 8,108,549 acres. Within that acreage are 4 existing wilderness areas including the Anaconda Pintler with 158,615 acres, the Frank Church with 2,366,757 acres, the Bob Marshal with 1,009,356 acres and the Bitterroot Selway with 1,340,460 acres. Other acreage includes that of the two largest National Parks in the state. Glacier National Park with 1,013,572 acres and Yellowstone National Park with 2,219,789 acres. There are also many additional national historic sites in Montana in which many activities of motorized or mechanized nature are not allowed.

SAWS believes that not only are the needs of snowmobilers not being met with this plan, but the need of all forms of motorized recreationists is falling short of what their indicated needs are. With the implementation of Alternative 6, reduced winter as well as summer motorized access will occur. With the adoption of Alternative 6, mechanized activity in recommended wilderness is also being eliminated. An increase in limitation by means of access including mechanized and motorized activities year round will not only restrict those specific activities but the activities of those individuals who commonly access an area with motorized or mechanized means as a starting point for their non-mechanical or non-motorized activities.

***NVUMR Aug 2001 USDA Reg 1 BDNF**

The manner in which decisions have been made are reason for concern in part relative to the September 1, 1998 Addendum to the 1996 Deerlodge Forest Area Forest Visitor/Travel Map for the BDNF. Areas identified at that time to become closed to wheeled motorized vehicles yearlong and those areas that were already closed yearlong at the time to wheeled motorized access have in this BDNF FEIS now taken on added acreage and are either being included in recommended wilderness, wilderness study areas, summer-non motorized or winter non-motorized areas. The public has not had input into those progressively restrictive actions and was not informed that by those areas being closed to wheeled motorized vehicles at the time of implementation that they would also become closed to over the snow access (snowmobile) eventually and placed into recommended wilderness, or other non-motorized categories. The designation of these closures to all forms of motorized and in some cases mechanized activities was deceptive in nature. All of the motorized routes that are proposed for closure are on lands designated for multiple-use by Congress.

The most equitable management of public lands is for multiple-use. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as “*The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...*”. Outdoor recreation is the first stated purpose of the act. Roadless areas would be managed as non-motorized areas/defacto wilderness areas which effectively circumvent the congressional approval process for wilderness areas, and the requirements of MUSYA and NFMA to meet the widest cross-section of public needs for recreation. The evaluation did not include a meaningful assessment of the cumulative effects of all current and reasonably foreseeable motorized closures on motorized recreationists

As stated in the BDNF FEIS executive summary: “**Recommended Wilderness:** In all action alternatives, motorized travel is restricted in recommended wilderness. Forest Service policy, FSM 1923.03 (2) states any area recommended for Wilderness is not available for any use or activity that may reduce the area’s Wilderness potential. This national policy allows each forest to determine, through the land management planning process, the uses best suited to protect an area’s Wilderness potential.”

SAWS disagrees with the direction chosen by Region 1 as many studies have proven the use of snowmobiles over a layer of snow leaves virtually no evidence of

disturbance once the snow has melted. FSM 1923.03 also states the National Forest Service policy applying to RWA's, as "*Activities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the potential wilderness area*". It is SAWS belief that Snowmobile use does not "*compromise wilderness values*" or degrade wilderness character of the land. There is no Forest Service policy, directive or existing law that would prevent winter motorized recreation on snowmobiles from continuing to be allowed in RWA's. If snowmobile use is currently allowed in areas that may be recommended for wilderness in the future, then obviously this use did not diminish the wilderness value of these areas. Snowmobile use continues to be allowed in Region 6 RWA's and other regions throughout the US.

The direction Region 1 has chosen to adopt with elimination of activities currently occurring in all of the recommended wilderness areas of the BDNF is also contrary to the FSH directive clearly stating that the FS is not to change use in areas that they inventory as "potential wilderness areas". (FSH page 9, #71). It is completed with the express purpose of identifying all lands that meet the criteria for being evaluated for wilderness suitability and possible recommendation to Congress for wilderness study or designation. Paragraph 3 of 71 on page 9 also requires "local knowledge and judgment" which does not appear to have happened based on input from various County Commissions and motorized groups.

FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK
CHAPTER 70 - WILDERNESS EVALUATION

Amendment No.: **1909.12-2007-1**

Effective Date: **January 31, 2007**

Duration: **This amendment is effective until superseded or removed.**

Approved: **FREDERICK NORBURY**
Associate Deputy Chief

Date Approved: 12/19/2006

The BDNF FS planning team chose to follow the FSH in the elimination of the Electric Peak recommended wilderness area and the area of Mount Jefferson that was removed from recommended wilderness status. Other areas showing existing uses along with "local knowledge and judgment" should be taken into consideration with regard to other areas recommended for wilderness designation.

Alternative 6 as currently written is not acceptable to SAWS. SAWS opposes the reduction in winter motorized use to 61% from the current 84% of available snowmobile accessible area. This is a direct result of the proposed RWA(s), the

new proposed wilderness study area and the roadless areas that will be treated in essence as wilderness.

SAWS supports a modified version of Alternative 4 recommending that either Alternative 6 be removed from consideration or that elements of Alternative 4 be included in the existing Alternative 6. **Alternative 4 adds no new Wilderness acres and by far supports development of natural resources and motorized recreation. Alternative 4, as well as all other alternatives, contain a significant short fall in the underlying language stating to “prohibit motorized use in recommended wilderness and in “other” areas, some of which have little use.” We ask that the provision for “prohibiting motorized use” in RWA’s and “other” areas be stricken from the wording regardless of which Alternative the FS documents in the record of decision.**

Alternative 4 is the only alternative that shows any substantial positive economic impact. SAWS supports a revised Alternative 4 that contains no RWAs with zero acres and zero miles of trails closed to snowmobile use. SAWS supports no net loss of areas open to over the snow winter motorized recreation in any of the alternatives and for the record of decision. SAWS also advocates for inventoried roadless areas, whether recommended for wilderness or not, remain open to winter snowmobile motorized recreation as it presently exists. SAWS opposes closing RWA’s to winter snowmobile use. The fact that areas where snowmobile use exists qualifies as wilderness with the current level of snowmobile use proves that snowmobile use causes little to no lasting effect on the environment.

SAWS disagrees with the following statement from the BDNF FEIS executive summary for Alternative 6:

“Topic 4 - Recreation and Travel Management. The technology and popularity of motorized recreational vehicles, particularly winter recreation has increased. Over much of the forest, use has evolved through time rather than planning... The result is resource damage, wildlife conflict, and conflicts between user groups. In addition, the 2001 Off Highway Vehicle Plan Amendment for Montana, North Dakota, and portions of South Dakota (Tri-State OHV Decision) identifies motorized roads and trails based on a visual determination by the user of existence of a route prior to 2001.”

SAWS opposes the 329,000 acre expansion of wilderness and asks that all recommended wilderness be removed from the final alternative.

Recommended Wilderness: This alternative includes approximately 329,000 acres of recommended wilderness. Based on public comment this alternative reduced the size of recommendations for Mt Jefferson (dropping the south end), Lee Metcalf (dropped McAtee Basin), and Italian Peaks (dropped Deadman Lake). *The Electric Peak recommendation was dropped because the Forest Service had previously promoted snowmobiling there, which conflicts with recommended wilderness.* Additions under this alternative, which respond to public comment, include Garfield, Stony and Table Mountain and increases to the Anaconda Pintler Additions, Torrey Mountain, and Snowcrest proposals.”

The following list of areas are of special concern to SAWS and do not appear to meet the criteria for wilderness designation.

In the Anaconda area:

6W-FF-03-recommended wilderness-this area is recommended as an Anaconda Pintler Wilderness addition The Storm Lake area clearly does not meet criteria because of the existing man-made reservoir\dam that exists there. This is a popular hunting area too. This area has been accessed for years by full-size vehicles and continues to be accessed by full-size vehicles today. The existing side roads\trails are date managed and should continue to be managed in that fashion. There is an existing snowmobile designated route to Storm Lake and areas that are currently not wilderness in the area are accessed by back country snowmobilers throughout the winter months. The area also has private in-holdings which will make it difficult to manage as wilderness.

6W-CFF-02-recommended wilderness-this area is recommended as an Anaconda Pintler Wilderness addition. The Twin Lakes\Lake of the Isle area has existing roads even though they are currently not used. The roads were used extensively throughout the time of operations of the Anaconda Company to access the dam on upper Twin Lake for dam and water flume building and maintenance purposes. This is an existing RS 2477 corridor. Upper Twin Lake was a water reservoir for operations of the Anaconda Company. A four foot section of the dam was eventually removed by the Anaconda Company less than 50 years ago. Remnants of the man-made dam are still in place. Snowmobile travel is allowed in the area starting December 1 until snow conditions no longer allow travel. It is managed for Semi-primitive, Nonmotorized recreation, Resource Protection, Landowner Cooperation.

6W-BH-02-recommended wilderness-this area is recommended as an Anaconda Pintler Wilderness addition. Abandoned forest roads are prevalent in the area with

summer and fall recreationists adhering to date managed time frames for access. The area is widely used by snowmobilers in the winter within the designated dates of posted access. The area is widely used by hunters in the fall. Many access the area with mountain bikes too. This is a partial area of Area 4 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for resource protection with restrictions on Snowmobile access October 15-Dec 1. Mount Evans is found within this RWA.

6W-URC-02-recommended wilderness-this is an area currently date managed for motorized closures in the Dexter Basin area. It is a popular hunting area. Mechanized use is allowed and should continue. This is a partial area of Area 4 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for resource protection with NO restrictions on Snowmobile access.

6W-CFF-01-recommended wilderness-this area is recommended as an Anaconda Pintler Wilderness addition. Appearing on the Alternative 6 Winter Use Map in Red which the legend indicates is wilderness is difficult to determine as the 6W-CFF-01-marking appears in light pink and is almost indiscernible on the map. This is a partial area of Area 4 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. The area is closed to all motorized activity year long and is included in the A-P “closed to stock use; April 1-July 1 restriction depending on snowmelt and trail conditions. Reasons listed indicate resource protection, big game winter range, elk calving, semi-primitive non-motorized recreation and wilderness status. Mt. Tiny is found on the internal border adjacent to the Anaconda Pintler Wilderness. One Hundred Acre Meadow is on the North Border.

6W-BH-03-recommended wilderness-this area is recommended as an Anaconda Pintler Wilderness addition stretching along the southwest border of the current wilderness area. This is an area currently date managed for motorized closures. Access points falling outside of the RWA are the Pintler Lake area, Plimpton Creek, Mussigbrod Lake area. Mechanized use is allowed and should continue.

6W-CFF-08-recommended wilderness-there is an existing road\trail through this area to the Mud Lake area. Many backcountry snowmobilers use the existing road for backcountry snowmobiling access to loop to Fisher Lake or to Racetrack Peak, Trask Lakes, Mount Powell and East Goat Mountain. There is limited summer motorized use beyond Mud Lake. This is a partial area of Area 5 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. Areas

accessed include those in Area 6 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for resource protection with restrictions on Snowmobile access October 15-Dec 1. Existing seasonal closures are date managed and should continue to be managed in a similar fashion.

6W-URC-03-recommended wilderness-this is an area that BDNF has acknowledged has existing OHV use. It is commonly referred to as Stony and is located in the Sapphire Mountains of Granite County. This is a partial area of Area 2 on the September 1, 1998 Addendum to 1996 Forest Area Forest Vistor/Travel Map BDNF. It is managed for resource protection with restrictions on snowmobile access with some snowmobile access allowed. Skalkaho Pass intersects this RWA and 6W-URC-06wsa.

6W-URC-04-recommended wilderness- this is the area known as Harvey Creek-Sandstone, a partial area of Area 1 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for hunting and recreation opportunities allowing motorized travel and snowmobile use with date managed restrictions in place.

6W-CR-01 recommended wilderness-Snowcrest range in Beaverhead and Madison Counties are located in this area. Primarily date managed for summer and winter motorized access. Many popular hunting areas exist.

6W-P10-01 recommended wilderness-Torrey Mountain is located in this section of the Pioneers. Primarily date managed for summer and winter motorized access. Much of this area has current mechanized, summer and winter motorized activity occurring. Many popular hunting areas are found here. Snowmobile access allowed.

6W-JR-01 recommended wilderness-This is the area known as the Highlands, a partial area of Area 8 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. This area contains Table Mountain in the Butte area. Much of this area has current date managed mechanized, summer motorized activity occurring being managed for hunting recreation opportunities. Many popular hunting areas are found here. Adjacent areas designated for Winter motorized closure include 6W-JR-08 and 6W-JR-04 which are currently both date managed for summer and winter motorized use which should continue.

(from the BDNF FEIS executive summary for Alternative 6)

“Wilderness Study Areas: The two Wilderness Study Areas on the forest were established by an Act of Congress in 1977. These areas and their management will continue as outlined by the Wilderness Study Act, supporting wilderness characteristic assessments completed by the BDNF in 2003 (West Pioneers) and 2006 (Sapphire Mountains), and the March 2007 Stipulation for Dismissal to the Montana Wilderness Association vs. U.S. Forest Service lawsuit. **Site-specific travel planning will address winter and summer use within each WSA based on applicable law and policy including FSM 2329 by December 31, 2009.** “

6W-URC-06 WSA-wilderness study area-non-motorized-this area is also located in the Sapphires. Moose Meadows, Whetstone Ridge, Cow Camp Meadows, Ross Fork of Rock Creek and is South of Medicine Lake. Wilderness study areas have historically been open to existing motorized and mechanized use. This is an attempt at moving a WSA into a management practice that is being recommended for wilderness by implementing a non-motorized directive for the additions to this area. This is a partial area of Area 3 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for resource protection with restrictions on snowmobile access October 15-Dec 1. There are many back country snowmobilers that do ride in this area.

6W-URC-05 WSA-wilderness study area-non-motorized-this area is adjacent to the Anaconda Pintler Wilderness. The portion of the existing WSA adjacent to this is motorized at this time. O’Brien Ridge is located in the existing area. This is a popular backcountry snowmobile area. This is an attempt at moving a WSA into a management practice that is being recommended for wilderness by implementing a non-motorized directive for the additions to this area. This is a partial area of Area 3 on the September 1, 1998 Addendum to 1996 Forest Area Forest Visitor/Travel Map BDNF. It is managed for resource protection with restrictions on Snowmobile access October 15-Dec 1. There are many back country snowmobilers that ride in this area.

A few of the areas of concern that are designated to become closed to Winter motorized use which SAWS believe should continue to be accessible for Winter motorized use are:

In the Wise River, Wisdom, Jackson area-winter motorized use closures. These areas are date managed for motorized use and should continue to be managed as they currently are. The entire area is popular to backcountry

snowmobilers. There are many back country snowmobilers that travel through these areas:

6W-P10-04

6W-P10-03

6W-P10-02

6W-P10-01

West of Anaconda Winter closures:

6W-CFF-04-area Northwest of Anaconda has existing date managed motorized closures that should be allowed to continue as they currently exist. Closures are primarily to protect wildlife habitat for Mountain Sheep, deer, and elk.

In the Georgetown Lake area:

6W-CFF-06-subdivision area that should not be managed by the Forest Service action to restrict motorized access. Snowmobile use has occurred in the area for years.

6W-CFF-05-subdivision area that should not be managed by Forest Service action to restrict motorized access. Snowmobile use has occurred in the area for years.

6W-CFF-07-Discovery Basin Ski area and surrounding area. Signing exists that no motorized use exists in the area but by special permit the improved road access is maintained to the downhill ski area.

West of Wisdom-areas that are designated for Winter motorized closure:

6W-BH-05 West Big Hole- Many backcountry snowmobilers use the existing road for backcountry snowmobiling access. Located on the North side of Highway 43 and east of Hwy 93 at the top of Lost Trail Pass. There is an existing snowmobile trail in the area that is marked.

6W-BH-06 West Big Hole- Many backcountry snowmobilers use the existing road for backcountry snowmobiling access. Located on the South side of Highway 43 and east of Hwy 93 at the top of Lost Trail Pass. Backcountry snowmobilers use this area. May Creek is in the center of this area.

6W-BH-07- West Big Hole- Many backcountry snowmobiler access this area. Sheep Mountain is located on the Western border of this area.

6W-BH-08- West Big Hole- Many backcountry snowmobilers access this area with Upper Miner Lake as a destination.

With regard to timber management, SAWS agrees that something needs to be done to respond to the current trend of letting our forests die off as a result of disease and insect infestations. For this reason also, SAWS does not believe designation of additional wilderness at any level is in the best interest of the future of the Beaverhead Deerlodge National Forest. In the record of decision, the greatest number of acres available for timber harvest to be managed for the health and vitality of the forest in the future should be the course of action pursued by the Forest Service.

Respectively,

Dave Hurwitz,

Janine Stewart

Scott Chapman

(North Washington, Montana and Idaho SAWS representatives respectively)

[Snowmobile Alliance of Western States](#)