

November 29, 2007

Travel Management Planning Team  
Bitterroot National Forest  
88 Main  
Stevensville, MT 59870

Emailed to: comments-northern-bitterroot@fs.fed.us

I am responding to the Scoping Document release dated 9/27/2007 regarding the Bitterroot National Travel Management Planning process. I am a member of the Bitterroot Ridgerunners Snowmobile Club, Ravalli County Off-Road Users, Grassroots for Multiple Use, Montana Snowmobile Association, Blue Ribbon Coalition, Big Sky Coalition, Treasure State Alliance, and Coalition for Balanced Use. I am a senior citizen that utilizes the Forest for various recreation and believes public lands should be managed for use by the public.

I applaud you for granting an extension for response to January 30, 2008. I will send a separate letter dealing with my recommended action regarding specific areas, trails and roads.

This response deals with the contents and the preparation of the Scoping Document, Pages 1 to 13, plus a few of my general comments.

**1. Skewed Data** - On Page 1 your footnote states, "Solutions that incorporate the interests of the diverse parties will be given strong consideration by the Forest." On page 3, your footnote #4 lists the eleven organizations you met with to develop the Proposed **Travel Management Plan** to gather input on their current recreational use etc. This seems **discriminatory** to me – you only met with one, maybe two, motorized users group(s). Doesn't it seem you were soliciting "skewed" data? The hunters are one of the primary recreational users of the Forest. Did you meet with any of those groups? Economics is a vital issue to this valley and should have been given extensive consideration.

**2. Purpose and Need for Action** – Table 1 on Page 3 has biased input or was poorly prepared. The number of recreational vehicle sales is drastically increasing. Your purpose is to provide quality and quantity of routes to sufficiently meet the needs of the public while your objective is to resolve conflicts between motorized and non-motorized users. Every time you close another area, road or trail you are limiting motorized recreation and amplifying the resource damage done to the reduced/limited areas left to motorized recreation.

**3. Proposed Changes to Existing Condition** – Did you do any Environmental Justice Impact studies? Table 3 reflects you propose to decrease motorcycle trails by nearly 50%! Why didn't you do some proposed changes to increase motorized recreation? I strongly suggest you develop some alternatives that include increasing access roads and trails for all wheeled motorized recreation groups and increasing areas for snowmobilers. My philosophy is that public lands should be available to all users and we should learn to co-exist. But if that is not possible, perhaps you could develop an alternative to designate the West side of the Bitterroot Valley on the Stevensville and Darby RD for quiet users. Allow the motorized users access to the East side of the valley. That would meet an objective of all public land users to resolve some user conflicts. Maybe both groups could co-exist on the Sula and West Fork RD's?

**4. Statistics** – I think the graphic comparison on page 8 is very deceptive and misleading! The graph should reflect all public lands, including the Wilderness area. Another evidence that input into your proposal is very off-center and skews the information in table 4 and table 5.

**5. Dispersed Campsites** – Page 10 - What business is it of yours where I park my pickup and camper overnight? Camping should be allowed within 300 feet of any designated route.

### **General Comments**

**1. Trail 313** – Forest Service admits it has historically provided access for fire protection and the trail was historically open to motorized use. This entire Trail should allow public access for all user groups.

**2. No More Wilderness** – With approximately 50% of the BNF being wilderness, and the wilderness areas are large areas, there is no need to propose eliminating motorized use on trails within a short distance of designated wilderness areas and to preclude motorized use to protect wilderness characteristics in selected unroaded areas. This is just a “ploy” to create more defacto wilderness and hard to manage areas, and generates “more” conflicts among users. It seems the Forest Service forgets that Wilderness restricts management of fires and diseased trees, greatly increases costs of trail and dam maintenance, while restricting the public to enjoy their public lands. To me it takes the service out of Forest Service.

**3. Snowmobiling** – Snowmobiling causes minimal, if any, resource damage and has minimal, if any, impact on wildlife. Why restrict snowmobiles, except in the wilderness.

**4. Economics** – The greater the recreation opportunities the greater the economics to the Valley.

**5. Legalities** – Current laws, rules, and policies allow the operation of snowmobiles in Wilderness Study Areas on routes established prior to the passage of the Montana Wilderness Study Act. Closure of any of these areas or routes because they lie within a WSA is unlawful. It is my understanding that you can only use the 1987 BNF Management Travel Plan. Later proposed travel plans are still in litigation and cannot be enforced.

Sincerely,

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