



Montana Fish, Wildlife & Parks

Region One
490 N. Meridian Road
Kalispell, MT 59901
Jim: 406-751-4566
Fax: 406-257-0349
Ref: JS031-10
January 5, 2010

Andrew Johnson, USFS
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

RE: Island Unit Motorized Trail System Additions

Dear Andrew,

ATTACHED COPY FROM RECORD

We have reviewed your request for public input on the Island Unit Trail System Addition Project. We previously (July 6, 2009) made extensive comments on this proposal, and again refer you to that letter that drew heavily on cited scientific literature as a foundation. We are encouraged that some changes have been made to the proposal, particularly the elimination of the proposed routes near Patrick Creek and the addition of the Foys to Blacktail and Lakeside to Blacktail non-motorized routes. Our experience through the Recreational Trails Grant Program (RTP) has been that there is a very high level of demand for non-motorized trails opportunities on the Island District. We remain concerned however about the potential impacts from this proposal. Our major concerns are:

- Travel management for the Island Unit is one of the most important natural resource management actions the FNF can take for this area. It will set the stage for decades to come.
- The proliferation of unauthorized user-created trails, and the overuse and abuse of existing legal trails. This will only get worse with population growth. Already, some OHV trails that have been in existence for only a few years are being considered "traditional." If additional trails are opened, it will be nearly impossible to close them in the future. FWP sees a need to curtail such activities in important wildlife habitats on the FNF.
- There are inadequate law enforcement resources currently, and the addition of destination OHV routes will increase the demand. Opening additional trails will provide more opportunity and temptation for users to illegally pioneer new trails or go cross-country. The Island Unit Travel Analysis indicates that only one NTA has been issued regarding illegal motorized use since 2005, yet the problem appears to be much greater than this would indicate.
- The negative impacts of motorized use on elk and other wildlife are well documented in a substantial and growing body of scientific literature. The areas under consideration are spring, summer and fall range for elk, deer, moose, bear, wolf, mountain lion, and a lot of other wildlife. OHV and motorcycle use displaces animals and has been shown to reduce elk calf survival.
- Motorized use may severely impact existing non-motorized people's enjoyment of these designated trail systems. The closed road sections that are proposed for conversion to motorized trail systems are currently utilized by hikers, bikers and horses. It appears that proposed use would not be consistent with the current ROS designation.

- The scoping letter dated December 10, 2009 indicates that there are only 116 miles of trail open to motorized use, yet this statement excludes the 182 miles of snowmobile trails that are cooperatively groomed by the Flathead Forest, FWP and The Flathead Snowmobile Association
- In a previous meeting held between USFS personnel and FWP personnel regarding this proposal it was acknowledged by USFS that there are documented user-built routes in existence on the Island Unit and it was acknowledged that these trails are receiving use. These known user-built trails are not included in the summary of current trail mileages as provided in the December 10 letter, nor are they accounted for in the Island Unit Travel Analysis. We are hopeful that if a motorized trails system is developed that these known user-built routes, along with future user-built routes, will be aggressively monitored and obliterated.
- The scoping letter also indicates that there are 1,867 miles of single track available on the forest but does not indicate what percentage of these are maintained annually for use. Through the RTP grant program, we are aware that the Forest Service is deficient in resources to adequately maintain the forest-wide trail system. We are concerned that the addition of an extremely high maintenance motorized trails system would further stretch these resources.
- As we have jointly learned through the snowmobile trail grooming program, motorized trail systems require a high degree of involvement from both agency personnel and user groups. This commitment of resources must have a funding mechanism and must have long-term viability. Such trail systems also entail a high degree of infrastructure to accommodate the potentially heavy use, i.e. parking lots, restrooms, noxious weed treatments, trail maintenance and of course, law enforcement. I use as an example the high degree of financial commitment and infrastructural capital that has gone into the Canyon Creek snowmobile trailhead and parking facility. Any additional motorized trail systems on the Flathead should have that same level of development and resource commitment. This is particularly true of a trail system for wheeled vehicles, as the impacts are potentially much higher.

It appears to us that the Forest Service may view the Island Unit as a "Sacrifice Area". However, we recognize the area's wildlife habitat and other recreational values. Opening roads that were originally closed to provide big game security will seriously compromise elk calving, neonatal, and summer range as well as habitat quality for other species. We used Hillis et al.'s model as a reasonable approach to identify elk summer security areas. As shown on the attached maps, the routing of proposed new trails through the heart of remaining security areas on Wild Bill and Blacktail Mountains would reduce these by at least 68%, and probably more (see Weber 1996). This is contrary to the statement on page 3 of your "Request for Public Input" that says, "All new trails would be designed and routed in close coordination with Forest Wildlife Biologists ... to minimize the effects to wildlife." We recommend that you convert roads that are within the 121 existing miles of roadway that are currently open to motorized use year round to minimize the cumulative impacts on wildlife habitat.

Although the proposed action stipulates that new motorized trails "would be closed during the fall hunting season", it is unclear if this is the upland bird season opening on September 1st, archery season opening about September 6th, or the general rifle season that opens around October 25th. The difference is significant in keeping elk on the landscape.

Thank you for this opportunity to comment.

Sincerely,

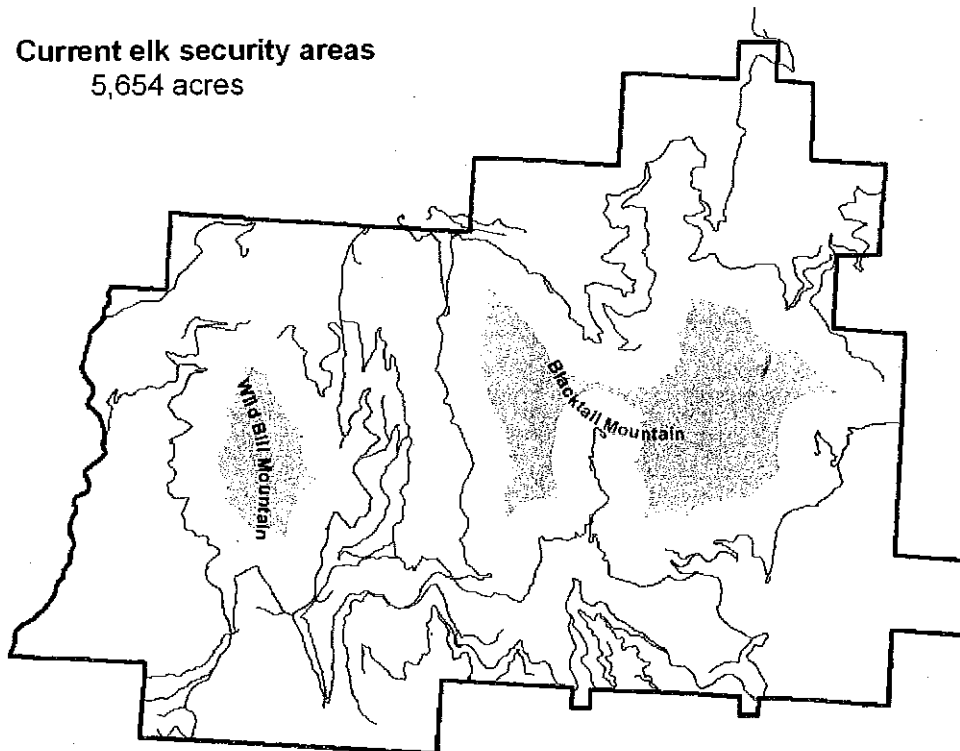


James R. Satterfield Jr., Ph.D.
Regional Supervisor

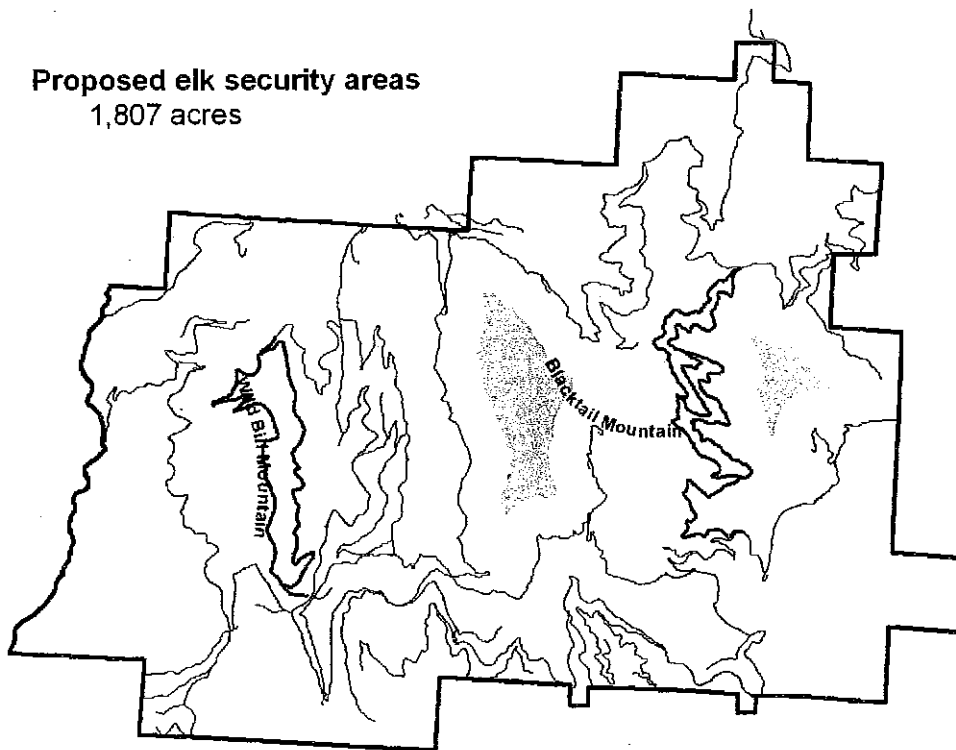
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Current elk security areas
5,654 acres



Proposed elk security areas
1,807 acres



Open roads and elk summer security areas (gray shading) on Wild Bill and Blacktail Mountains currently and with proposed OHV trails shown in bold.



2009 LETTER

Montana Fish, Wildlife & Parks

Region One
490 N. Meridian Road
Kalispell, MT 59901
Jim: 406-751-4566
Fax: 406-257-0349
Ref: JS069-09
July 6, 2009

Andrew Johnson, USFS
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

RE: Island Unit Roads Analysis

Dear Andrew,

We have reviewed your request for input on travel opportunities on the Island Unit portion of the Flathead National Forest (FNF). Travel planning for this area is needed, and we commend your effort. We agree with former Forest Service Chief Dale Bosworth who said, "We have got to improve our management [of OHVs] so we get responsible recreational use based on sound outdoor ethics." (Bosworth 2004). FWP believes that your travel management efforts for the Island Unit is one of the most important natural resource management actions the FNF can take for this area, and it will set the stage for decades to come. We appreciate the contentious nature of the matter and realize there is much at stake.

The heart of the issue is OHV and motorcycle use. MFWP is not opposed to responsible motorized use where it does not compromise natural resources and wildlife habitat or severely impact the outdoor experience of other recreationists. However, proliferation of unauthorized user-created trails, and overuse and abuse on existing legal trails in recent years, is of great concern to us. Such problems will only get worse with population growth in the Flathead Valley and the increased number of OHVs and motorcycles that will come along with it. We feel it is important that travel planning be done carefully and that such plans consider the effect on wildlife and all user groups. Already, some OHV trails that have been in existence for a only a few years or have seen a marked increase or change in use in a relatively few years are being considered as "traditional."

Another concern of ours is law enforcement. Already there is inadequate enforcement, and opening additional trails will provide more opportunity and temptation for users to illegally pioneer new trails or go cross-country. The FNF has neither the personnel nor budget for adequate law enforcement in the area, and it is unlikely that such will be forthcoming in the near future.

OHV and motorcycle use can cause direct resource damage, particularly to soils and riparian areas. It can also compromise wildlife habitat by introducing motorized disturbance during critical times of the year, such as calving. This is an issue for species sensitive to disturbance and to less sensitive species during critical times of the year, like elk on summer range. Large blocks of several square miles of undisturbed areas are important to maintaining usable habitat as well as productivity.

Your proposed new motorized trail would incorporate and open several miles of Forest Service roads that have been closed to motorized use for many years, in some cases a decade or more. These roads were closed by the Forest Service to reduce open road density and provide wildlife security, particularly for elk. Your proposal would both open and connect existing closed roads, thereby decreasing wildlife security through many sections of relatively secure summer range. In addition, this area would not provide secure habitat for elk, moose, or deer for hunters during the hunting season. Elk, in particular, would be quickly dispersed. Elk displaced from public land are increasingly becoming a frustration to hunters and a management challenge to FWP. It is worthwhile noting that FWP does not allow use of OHVs on most of its Wildlife Management Areas because of the disturbance to wildlife and the potential for abuse.

The impacts of motorized use on elk and other wildlife are well documented in a substantial and growing body of research literature. Both Canfield et al. (1999) and Gilbert (2003) provide summaries useful in developing a travel plan sensitive to wildlife. A few more recent examples include Wisdom et al. (2004) who found that 25 percent of elk exhibited a flight response to ATVs that were 1000 meters (1 km or 0.6 miles) away. This is an interesting point because one sometimes hears from advocates that they often see elk from their OHV. Stubblefield (2006) found that elk in South Dakota selected summer range with low road densities. Working in Montana, Grigg (2007) found that elk in areas that were easily accessible to motorized use abandoned summer range early, usually before hunting season. Thus elk displaced by OHVs directly negatively impacted elk hunters.

Not only are elk displaced by increased human disturbance, but when such use occurs in calving areas or neonatal rearing areas, there may be an impact on calf survival. Studies in Colorado documented a significant decrease in calf survival as a result of only 10 experimental disturbances over the course of the month-long calving period (Phillips and Alldredge 2000; Shively, Alldredge and Phillips 2005). In their 2000 paper, Phillips and Alldredge (p 528) noted that, "It is difficult to predict whether a declining population will eventually stabilize or become extirpated; *even more difficult to curtail human activities once they become traditional* (our emphasis) or to recover wildlife habitats once they are lost." If additional trails are opened specifically for OHV use, it will be nearly impossible to close them in the future. FWP sees a need to curtail such activities that are quickly becoming considered "traditional" in important wildlife habitats on the FNF.

Motorized routes on ridges, especially in elk summer range, should be avoided. In addition to being important seasonal habitat, such areas can also be important movement corridors. The Island Unit was recently identified as part of the Flathead Sloughs and Hog Heaven linkage zones (American Wildlands 2008, 2009), and increased motorized use in these areas has a high probability of further displacing wildlife. Examples of such trails are those proposed additions to the Blacktail OHV trail along the east side of Wild Bill Mountain. Trails such as these have a disproportionate effect on elk.

Motorized use can severely impact many people's enjoyment of their National Forest. Hunting is one of the main outdoor recreational uses in the Flathead Valley. In 2008 Hunting District 120, which includes the Island Unit, received 17,459 hunter days of deer hunting and 9,652 days of elk hunting, not to mention hunting for moose, lion, bear, and upland birds. Most of this hunting occurs on public land like the Island Unit and depends on the wildlife productivity and habitat values found there. As we discussed in our meetings, illegal motorized use is already occurring on both public and private lands. Many hunters and other outdoor recreationists are already displaced by motorized use as well as development and/or closing of private lands once open to hunting. Hunters in this area rely more and more on public lands for hunting and other recreating opportunities. Providing roaded access in areas not currently open reduces opportunities for those who recreate behind gates and reduces nonmotorized user's quality of recreation. Loss of hunting opportunity or quality translates into loss of this tradition, which is important to our local residents and our local economy. Managers often misinterpret decreased recreational use of

an area as a decrease in demand for nonmotorized use (Belich 1988). This should not be underestimated. In fact, the most rapidly increasing outdoor pastimes in the United States are bird watching, day hiking, and backpacking (The Wilderness Society 2006).

Thank you for this opportunity to comment.

Sincerely,



James R. Satterfield Jr., Ph.D.
Regional Supervisor

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