December 10, 2002

Rick Prausa, Forest Supervisor
Lewis & Clark National Forest
PO Box 869
Great Falls, MT 59403

RE: Rocky Mountain Front Travel Plan - Comments of the Back Country Horsemen of Montana

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Dear Supervisor Prausa and Travel Planning Staff:

The Back Country Horsemen were formed in 1973 with the intent to become involved in public lands management, especially as it affected recreational stock users. Through volunteer efforts we have worked with and assisted the Forest Service in various maintenance functions that have improved recreational opportunities for all users. We have worked to educate stock users about low impact methods of handling stock on the public lands. Recently, we received recognition of our efforts by the appointment of a Back Country Horsemen representative to the national Leave No Trace (LNT) board of directors. We are concerned about preservation of the backcountry resource and our work continues to be done.

Accordingly, as we review the proposed action for revising the Access and Travel Management of the Rocky Mountain Ranger District, our concerns escalate. That concern arises because of the increased promotion of non-traditional motorized use which will bring more motorcycles and all terrain vehicles to this fragile land. Where trails exist that are only marginally usable by motorized vehicles, contests will occur to challenge the obstacles or demands will be made to improve the trails to accommodate such use, causing further degradation of the resource. Even though non-traditional motorized use was included in the previous (1988) travel plan, that plan was rejected by regional and national supervisors of the Forest Service due to unknown impacts on wildlife and the water and soil resources. Although the plan was never rewritten, non-traditional motorized use did not develop south of the Badger-Two Medicine area, perhaps reflecting our society's interest in preserving the wilderness qualities of the Front.

As horsemen, we have worked to make multiple use trails a functional concept, however, find that the noise of the machine plus the necessity of the riders concentration on the trail often inhibits their awareness of other users. Therefore, safety has become a factor as non-traditional motorized use displaces quiet trails. New, more powerful machines will only exacerbate these conditions. No areas exist that will be able to handle the resulting environmental impacts. We ask that you act responsibly toward this wild land resource by restricting motorized users to designated system roads.

As we reviewed the proposed travel designations for existing trails, then analyzed the impacts that have been occurring where motorized use has been allowed, considered the potential impacts on wildlife, including endangered species, it became more difficult to perceive the legitimacy of increased motorized use on these lands. Specifically, trails 101 and 103 proposed for all terrain vehicle use and 141, 142, 145, and 147 proposed for motorcycle use, all being located within the Badger-Two Medicine area, appear to intrude on what has or will be designated as the Continental Divide Scenic Trail (CDT). The CDT was designed as non-motorized throughout its length. Motorized use in this area intrudes on a sensitive wildlife population and extends the application of "road hunting" to the designated trails. Accordingly, it is diminishing wildlife habitat for the endangered grizzly bear in the Northern Continental Divide Eco System, as well as diminishing the quality of the hunting rights provided to Native Americans in the treaty ceding the area to the United States. Motorcycle usage allowed on trail numbers 144, 146, 148, 149, and 183, also within the Badger-Two Medicine area, will also deteriorate wildlife habitat and should no be permitted.

Trail numbers 153, 155, 156, and 177, comprising Clary Coulee, Jones Creek, and up to Dupuyer Creek, all designated for motorcycle use, transit sensitive grizzly bear, bighorn sheep and mountain goat habitat and such use should not be permitted. Actual location of the Clary Coulee trail number 177, at its upper extension, is more imagination than reality. This land has incredibly wild and scenic vistas.

Trial numbers 126 and 127, being Rierdon-Slim Gulch and Green Gulch respectively, as well as the North Fork of Deep Creek trail number 135 should all be non-motorized due to their wilderness quality. The area was previously proposed for wilderness designation and should retain those qualities. The upper extensions of trails number 128 and 168, being the South Fork of Deep Creek and the North Fork of Deep Creek, as well as numbers 108 and 109, being the Middle Fork and the South Fork of the Teton are appropriately characterized. Hiker and horse traffic on trail number 108 is heavy and could cause safety problems if encountering motorized users. Improvements on the trailhead parking lot at the South Fork of the Teton are desirable, as non-directed traffic tends to limit the usable space. The East Slope Back Country Horsemen will assist with recommendations and resulting changes to accomplish improvements.

Blacktail Gulch, Mortimer Gulch and Norwegian Gulch should not be motorized as horsemen and hunters have historically used them. Outfitter hunting camps still exist up Blacktail Gulch.

Trails numbered 204 and 210 going up Fairview Creek and to Renshaw Mountain then over to the Willow Creek Guard Station should not be motorized. Currently there is very limited motorized use and the area should not be opened to such use. The area hosts prime elk hunting and is a major migration route into the Sun River Wildlife Management Area. Favorable non-motorized use is designated in the Benchmark area as well as the Elk Creek and Falls Creek drainages, which is commendable.

Snowmobile traffic, although not creating significant impact on the ground, can and does provide illegal access to wilderness areas. When access is permitted to the boundary of the wilderness the lack of a buffer zone inhibits enforcement of trespass. We would ask that the snowmobile area restrictions be moved back to provide a buffer zone.

Those of us that have a pronounced streak of the primitive set within us find the whine of engines and appearance of motorized vehicles to be significantly intrusive in

our attempts to leave civilization and immerse ourselves in the shared environment with elk, bighorn sheep, mountain goats and, reverently, the grizzly bear.

Thank you for the opportunity to comment on the proposed actions of the Lewis and Clark National Forest regarding the travel plan of the Rocky Mountain Ranger District. We request to be included in the planning process as the plan develops. Please mail further actions regarding this plan to the following:

Bob Facklam, President, East Slope BCH, Box 967, Choteau, MT 59422
Merlyn Huso, National Director - BCHA, 5425 Peaks View Drive, Helena, MT 59602
Kurt Dyer, Issues Chairman, BCH of MT, Box 228, Brady, MT 59416
Dave Schilz, Chairman, BCH of MT, PO Box 1745, Red Lodge, MT 59068

Sincerely,
Back Country Horsemen of Montana

Dave Schilz,
Chairman

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