

Chapter 5 – Response to Comments

5.1 PUBLIC COMMENT ANALYSIS PROCESS

Content analysis of comments received on the DEIS was conducted. Public comments were received in the form of letters or postcards, electronic mail (e-mail), phone calls, and facsimiles. A Content Analysis Team reviewed all the comments on the DEIS. Substantive comments from each letter, e-mail, or form were identified. Each issue or topic was assigned to a subject area and a response number and the various comments dealing with that topic or issue were grouped under the response number heading. A response was written for each topic or issue that was identified. All of the responses are grouped by subject area and provided in this chapter.

Respondent's and agency names are listed below with response numbers to allow the reader to see how their comments were responded to or used. Persons wishing to find responses to their comments on the DEIS should locate their name and assigned codes below and the corresponding ID Team response. For example:

Alderson, George & Frances	MGMT-11, R-6, WL-9
Alexander, Jenny	R-2

The only agency comment letters received on the project were from the Environmental Protection Agency, USDI-Office of Environmental Policy and Compliance, and the State of Montana Department of Natural Resources and Conservation. These letters are included in Appendix H.

Agency Names	DEIS Response Numbers
State of Montana, Department of Natural Resources and Conservation, Southern Land Office	MISC-38
U.S. Environmental Protection Agency, Region 8 MT Office	F-2, F-3, H-2, IMP-1, MGMT-3, MISC-15, MISC-16, MISC-35, MTCE-1, MTCE-4, S-2, V-5, WL-3, WQ-1, WQ-2, WQ-16
USDI Office of Environmental Policy & Compliance	No Comment

Organization Names	DEIS Response Numbers
Beartooth Back Country Horseman	IMP-1, MISC-43, R-2
Billings Motorcycle Club	R-7
Capital Trail Vehicle Association	E-1, E-2, E-4, E-7, E-12, H-1, H-2, H-3, H-4, IMP-1, MGMT-4, MGMT-5, MGMT-6, MGMT-7, MGMT-8, MGMT-9, MISC-2, MISC-4, MISC-5, MISC-6, MISC-8, MISC-9, MISC-10, MISC-13, MISC-14, MISC-17, MISC-18, MISC-24, MISC-28, MISC-35, MISC-45, MISC-47, MISC-48, MISC-51, MISC-52, MISC-54, MISC-55, MISC-65, MISC-66, MISC-67, MISC-69, MTCE-2, MTCE-4, N-1, R-1, R-4, R-5, R-6, R-8, R-9, R-11, R-15, S-3, SA-1, SOU-1, SOU-2, SOU-4, V-24, WL-6, WL-12, WL-14, WL-17, WL-24, WL-26, WL-40, WQ-13, WQ-14,
Citizens for Balanced Use	E-2, E-4, H-3, IMP-1, MISC-4, MISC-56, MISC-57, MISC-58, MISC-71, R-6, R-11, WL-11, WL-25, WL-26, WL-29
Concerned Families for ATV Safety	SA-3
Extreme Machines	R-7

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Organization Names	DEIS Response Numbers
Families for Outdoor Recreation	C-6, E-5, E-6, H-3, IMP-1, IMP-3, MISC-5, MISC-10, MISC-17, MISC-18, MISC-19, MISC-23, MISC-25, MISC-32, MISC-49, MISC-55, MISC-65, N-1, R-2, R-4, R-5, R-6, R-7, R-10, R-11, R-13, R-14, R-15, SA-4, SOU-1, SOU-2, WL-12, WL-13
Great Falls Trail Bike Riders Association	E-7, MISC-24, MISC-37, MISC-49, R-4, R-7, R-11, R-14, SOU-1, WQ-3
Magic City 4Wheeler Inc	C-6, MISC-10, MISC-49, MISC-62, R-4, R-7, R-13, R-14, SOU-1
Montana River Action	V-12
Montana Snowmobile Association	E-5, R-5, R-6, R-7, R-11
Montana Wilderness Association	MGMT-1, MGMT-15, MGMT-16, MGMT-18, MISC-3, MISC-11, MISC-15, MISC-22, MISC-35, MISC-73, R-6, R-11, SOU-1, V-11, WL-16, WL-19, WL-32, WL-34, WL-35, WL-36, WQ-15
Montana Wilderness Association, Eastern Wildlands Chapter	IMP-1, IMP-4, MISC-3, MISC-31, MISC-35, MISC-43, MISC-72, R-2, WL-19
SDSM&T Hardrocker Racing – Mini Baja Division	R-3
The Cloud Foundation	IMP-1, IMP-4
The Pryors Coalition	C-4, MGMT-1, MISC-3, MISC-31, MISC-32, MISC-33, MISC-35, MISC-36, MISC-39, MISC-40, MISC-42, MISC-43, MISC-53, MTCE-1, R-4, R-6, S-1, SOU-1, V-20, WL-8, WL-9
Treasure State ATV Association	E-3, MISC-49, R-4, R-7, R-11, SOU-1
Wildlands CPR	C-3, C-4, C-5, C-7, C-8, F-1, F-2, F-3, F-4, F-5, F-6, F-7, H-5, IMP-1, MGMT-14, MGMT-19, MISC-3, MISC-8, MISC-11, MISC-20, MISC-21, MISC-22, MISC-29, MISC-35, MISC-40, MISC-43, MISC-44, MISC-45, MISC-64, MISC-68, MTCE-1, MTCE-4, MTCE-5, N-3, R-6, R-11, S-1, S-2, S-5, SA-2, SA-3, V-10, V-18, V-19, V-21, V-22, WL-15, WL-33, WL-39, WQ-1, WQ-4, WQ-5, WQ-6, WQ-7, WQ-8, WQ-9, WQ-10, WQ-11, WQ-12
Wyoming Wilderness Association	MGMT-1, R-6, R-12, R-16, SOU-1, WL-22
Yellowstone Valley Audubon Society - Lubbers	IMP-1, MISC-15, MISC-31, MISC-32, MISC-33, MISC-35, MTCE-1, N-1, S-1, S-7, SOU-1, V-5, WL-18, WL-28, WL-31, WL-38
Yellowstone Valley Audubon Society - Ostovar	IMP-1, MISC-15, MTCE-1, S-1, WL-4, WL-5, WL-6, WL-7

Individual Names	DEIS Response Numbers
Alderson, George & Frances	MGMT-11, R-6, WL-9
Alexander, Jenny	R-2
Alexander, Josh/Chip/Kathy/Daniel/ Heather	R-2
Althoff, Allen A.	MTCE-1
Anderson, Dale	IMP-1, MISC-37
Ankrum, Dan	R-4
Barnard, Grant	IMP-1, IMP-2, MISC-7, MISC-35, MTCE-1, MTCE-4, N-2, R-2, SA-3, V-2, WL-8, WL-10
Beck, Barbara	IMP-2, MISC-15
Bennett, Donna C.	N-2
Blalack, Russell E.	N-2
Blanksma, Loren	F-1, H-3, MISC-17, MISC-24, R-6, R-7, R-13, SOU-1, WL-1, WL-6, WL-20, WL-27
Blaquiere, Bill	E-5, R-7

Individual Names	DEIS Response Numbers
Blevins, Auzie & Marilyn	C-4, IMP-1, MGMT-1, MISC-12, MISC-31, MISC-32, MISC-36, MISC-43, MISC-70, MTCE-1, S-6, SOU-1, V-5, WL-9, WL-21
Bragg, Stacy	E-4, E-5, E-10, H-3, IMP-1, IMP-3, MGMT-13, MISC-2, MISC-17, MISC-23, MISC-60, MISC-61, R-2, R-11, V-23, WL-12, WL-34
Breeding, Noreen & Roger	H-2, IMP-1
Bressler, Suzanne J.	IMP-1
Brewster, Larry	R-13
Bruner, Darla J.	MGMT-1
Caplette, Virginia	N-2
Cardwell, Robert D.	R-7, WL-1
Carter, Sally	IMP-1
Cassel, Jay	C-1, R-11
Cellan, Dave	R-13
Christianson, David	R-6
Cooper, Lee	SOU-1
Cossitt, Anne	MGMT-1
Court, Jim	IMP-1
Darnielle-Morse, Teresa L.	IMP-1
Deenes, Scott	R-7
Demoroy, Gordon	R-4
Denny, Tina M.	S-1,
Devries, Johanna	N-2
Dillon, Matthew	IMP-1, MISC-59, SOU-1
Dominick, Bettye	IMP-1
Donnes, Charlie	IMP-1, MISC-17, R-6
Donohoe Arthun, Kayce	WL-2
Donohoe, Cathy & Paul	WL-2
Eldringhoff, Jim	IMP-1, MISC-17
Erhard, Rory	R-13
Erhart, Susan	R-7, WL-2
Exley, Jack L. MD	IMP-1, SA-3, SOU-1
Ferris, Mark E. PhD	WL-9
Fitch, Jeffrey T. & Heidi J.	IMP-1
Forrester, Cheryl	R-4
Garritson, Robert/Barbara/Robert Jerek	C-6, R-4, SOU-1
Gies, Stephen	IMP-1
Gleason, Glen	MGMT-9
Gliko, Elaine	IMP-1, IMP-2, N-2
Grewell, John/Betty	R-2
Hairing, Robert D.	WL-19
Hansen, Allen	R-4
Hanson, Jerry	R-2
Harakal, Marc	WL-6
Hardtke, Allan	MISC-49, R-4, R-7, SOU-1
Hayes, Katie & Peter	R-7, WL-2
Herbst, Steve	MISC-10, MISC-34, MISC-49, R-7, SOU-1
Herbst, Vonnice	R-13, SOU-1
Hert, Dale	R-4, SOU-1
Hert, Darlene	R-4
Hogan, Terri	SOU-1
Hurdle, Joan	WL-21
Hutzenbiler, Lonnie	R-2

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Individual Names	DEIS Response Numbers
Jaquith, Phillip H.	IMP-1, MGMT-20, MISC-36, MISC-49, MTCE-1, SOU-1, SOU-3
Johnnansen, Danette	R-13, SOU-1
Johnnansen, Duane	R-8, SOU-1
Johnson, Bill	R-7
Jones, Dana	IMP-1
Jones, Scott	R-7
Kania, Aaron	H-2
Kary, Douglas	IMP-1, MISC-5, MISC-10, MISC-34, MISC-49, R-7, R-11, SOU-1
Kelker, Tiffany	C-2
Kemmel, Kevin	R-6, R-7
Krum, Calvin	IMP-1
Lamb, Mike	R-7, WL-2
Larson, Sloane	SA-1
Lehnherr, David	MISC-35, SOU-2
Lesica, Peter	MISC-35, MTCE-4, V-13
Lorenz, Ed	E-9, R-7
Lucas, Nancy	R-2
Lund, Judi K.	R-16
Martin, Jesse	IMP-1, MISC-49, R-2, V-1
Martin, Marise J.	IMP-1, R-13
Marty, Leslie & Bruce	V-5, V-9, V-14
Mattson, Steve	R-13
McCracken, Clayton	IMP-1, MGMT-10, MGMT-21, MISC-34, MISC-35, MISC-36, MISC-49, R-4, S-4, SA-2, SA-3, SOU-1, V-5, V-8, V-16, WQ-15
Miller, Anthony	E-7, H-3, IMP-1, MISC-10, MISC-18, SA-1, SOU-1
Miller, Brit	IMP-1
Miller, Neil O. & Jennifer S.	IMP-1, R-12, R-13, WL-9
Mowat, Bernice W.	N-2
Munsell, Mary	IMP-1
Murray, Laurie	IMP-1
Newell, Susan	H-2, IMP-4, MGMT-12, MISC-31, MISC-35, MISC-43, MISC-50, MISC-63, R-6, R-10, R-12, S-1, SA-3, SOU-1, V-3, V-25
Nusbaum, Ron	IMP-3, MGMT-2, MISC-7, MISC-35, MISC-43, MTCE-1, R-2, SA-3, SOU-1, V-25, V-26, WL-37
O'Brien, Mary	N-2
Osmun, Cathie	IMP-1, N-2, SA-3, SOU-1
Parker, Peg	R-4, R-6, R-7, SOU-1
Parker, Tom	E-8, MISC-17, MISC-30, MISC-37, MTCE-3, R-4, R-5, R-6, R-7, R-10, R-11, R-14, SOU-1
Parkin, Valerie	IMP-1
Penfold, Mike	MISC-3, V-5, WL-22
Peterson, Michael	IMP-1
Quetchenbach, Bernard	MISC-31
Ratcliff, Bryan	R-7, WL-1
Rex, Polly	WL-2
Robertson, Philip A. PhD	IMP-2, MISC-35
Roe, Teddy	IMP-1, MISC-31, MISC-43
Roney, W.P.	MISC-31, WL-30
Rose, Bernard	E-11, IMP-1, MISC-35, SOU-1
Rose, Dave	N-2
Schmidt, Scott	R-7

Individual Names	DEIS Response Numbers
Schwarzrock, Wes	R-7
Schwend, Ty	SOU-1
Silverman, Makendra	V-15, WL-23
Simmons, John P.	N-2, R-2, R-16
Smeets, Erna	N-2
Smith, Carellen	R-2
Smith, Christopher Scott	MISC-26
Smith, Dave	R-2
Sneed, Paul	R-6, V-5
Steinmuller, Patti	R-12, S-4
Stephens, Don	R-4, R-7, SOU-1
Stevens, Emery	MGMT-17, R-4, R-7, SOU-1
Stevens, Nanette	MGMT-17, R-4, R-7, SOU-1
Struck, Wilf	MISC-27, MISC-41, MTCE-1, R-7
Strum, Ernest C.	IMP-1, MISC-43, R-2
Tabaczka, Ron	R-12
Taylor, Mark	MISC-1, MISC-36, MISC-46, V-4, V-7, V-17
Tucker, Chris	WL-12
Vanderhorst, Ruth	MTCE-1
Walton, Dick	MISC-31, MISC-44, R-6, SA-3, V-5
Webster, Margaret	C-4, IMP-1, IMP-4, MISC-3, MISC-12, MISC-24, MISC-35, MISC-49, MTCE-1, R-6, R-11, SA-3, SOU-1, V-6, WL-19, WL-22, WL-24
White, James W.	R-6
Wilcox-Weston, Wanda	R-2
Wood, Brad	WL-8
Wuerthner, George	IMP-1, MGMT-3

**INDIVIDUAL and ORGANIZATION NAMES
SUBMITTING COMMENT LETTERS ON DEIS
With No Substantive Comments noted during Content Analysis**

Alberi, Susan	Clayton, John	Haidle, Thomas L.
Alby, Dan	Coffey, Jerome	Halter, Nancy
Anderberg, Jerry	Cooper, Diane	Hammerquist, Randy
Anderberg, Ruth	Cooper, Nathan	Hancock, Beverly K.
Appel, Zach	Cox, Kimberly	Hanson, Deborah
Archer, Barbara	Cozzens, Sue	Harding, Rita
Armijo(Linderman), Knoxann M.	Crawley, Cara	Harrington, Brian
Auren, Nancy	Debethizy, Cindy Zullo	Harris, Jay
Ausen, Steven	Dell, Thomas	Haverlandt, Kelly
Babb, Andy	Dobson, Edward M.	Heinz, Dan
Bahin, Louis J.	Dodge, Dave	Heinze, Donald H.
Bailey, Delona	Dominick, Marshall	Helena Outdoor Club
Bailey, James	Dopp, Bethany	Helus, Theresa
Baken, Jim	Downing, Michael	Henckel, Mark
Bartel, David A.	Dulin, Melissa	Hickok, Beth
Bayley, Annette F.	Dunphy, M.C.	High, Ken
Bayley, Stan	Dykema, Henry	Hilden, Alan D.
Beam, Daryl & Carol	Ettleman, Mrs.	Hill, Mariah
Beardslee, Greg	Faber, Cary	Hilliard, Jesse, Colt & Carson
Bergan, Barry	Farr, Chuck	Hilliard, Lynn
Berner, Jerry	Fasching, Michael	Hills, Susan
Berry Nies, Barbara	Feister, Brooke H.	Hodson, Brock
Bibler, Carol	Fenex, Ron J.	Honkomp, Dennis
Bischke, Scott	Ferrell, Doug	Hooper, James V.
Bischoff, Patricia	Fiddler, Jim	Horan, Janis
Blackmore, Tana	Fierer, Lisa	Horgan, Chris
Boehmke, John	Fitzpatrick, Mary	House, Helen
Bollinger, Shirley	Forehand, Dick	Hughes, Bob
Boone, Jean	Franczyk, Greg	Hughes, Joan
Borberg, Robert	Frazier, Georgia J.	Hunnes, Cristi
Borges, Miles	Freeman, Glenn	Hustad, Marlon
Braun, Stephen	Garcia Costas, Amaya M.	Ingersoll, Randy
Brewer, Linda	Garvey, Lydia	Isreal, Nellie
Bronson, Dave & Ann	Germic, Stephen Dr.	Jahn, Greg
Brown, Lee	Gibson, Katie	Jamison, Cate
Brown, Scott	Glase, Terry R.	Janssen, Sue
Bruner, Sam	Goldin, Alan	Johnson, Robert P
Bruner, Sherry	Good, Mark	Johnston, Bob
Bruton, Pamela J.	Good, Peg & Jim	Jones, J.L.
Bryan, D	Gopp, Bub	Jones, John P.
Burgard, Don J.	Gray, Diana L. MD	Jones, Thomas
Burke, Kathie	Gray, Sandra Lynn	Kehler, Bill
Bushell, Frank	Gray, Stephen G.	Keith, Lynn D. & William
Byrd, Mary Ann	Gregory, Judith	Kellert, Jacob
Byrne, Kerrie	Grimland, David	Kennick, John A.
Caldwell, Elizabeth N.	Grimm, Karen L.	Kilmer, Tom
Carlstrom, Mark	Grunenfelder, Mike	Kindsfather, Gerald
Carson, Millie	Guay, Greg	Knight, James
Casteel, Brian	Gulbrandson, Dave	Kraus, Jim
Chamberlain, Cara	Gulick, Ed	Kuck, Harvey
Chester, Mary Alice	Gulick, Walter	Kuntz, Gail
Christianson, Dave & Pam	Gustafson, Billie	Kuras, Cathleen
City of Red Lodge Parks Board	Gustafson, Lee	Kurhl, Bryant
Claypool, Duane	Gustafson, Monty C. & Gayle L.	Landis, Connie M

Larmayeux, Jack D.
 Larrabee, Consuelo
 Larsen, Bruce W.
 Larson, Joseph
 Lay, Scott
 Lebar, Jean
 Lebar, Jim
 Lehman, Tim
 Lemire, Linda
 Lillegraven, Jason A.
 Lischer, Henry J. Jr.
 Little, Deb
 Littlepage, Dean
 Lohrenz, Tim
 Loveless, Donald S.
 Lowe, Rob
 Lyman, Marian
 Mack, Rande
 Madson, Pete
 Makara, Mike
 Mangus, John
 Manternach, Duane
 Marshall, Lisa
 Mazyck, Jerome
 McCandless, Susanne
 McCormick, Susan
 McDowell, Letha
 McKeown, Joan R.
 McLaughlin, William C.
 McMurtry, Valerie
 McNally, Mary
 Miller, John W.
 Minkoff, Randy
 Montana Multiple Use Association
 More, Bob
 Morris
 Morris, Eileen
 Morrison, James
 MT Center on Disabilities &
 ACRES
 Myers, David
 Native Waters & Indigenous
 People
 Nettle, Robert
 Newton, Debbie
 Nies, Allan
 Norton, Rebecca H.
 Novak, Sharon
 Nyquist, Thomas E. Dr.
 O'Banion, Bruce A.
 O'Banion, Ralph
 O'Brien, Dan P.
 O'Loughlin, Jennifer
 Ohman, Gary

Olds, Lucille
 Omen, David
 Oset, James E.
 Owen, Frances C.
 Palmer, Carrie
 Paulsen, Janice
 Paulsen, Jim
 Petersen, Ryan
 Peterson, Dale
 Phelps, James
 Pitblado, Nancy
 Poling, Teresa
 Powers, Debo
 Preyer, Carol
 Priest, Paula
 Ralph, Kathleen
 Rausch, Loren
 Ream, Tarn
 Redding, Kim
 Restad, Bruce
 Reynolds, Alison
 Reynolds, Peter
 Rickels, Robert E.
 Ringer, Mary
 Riordan, Don
 Robertson, Mark
 Rockwell, David
 Rocky Mountain Ski-Doo
 Royer, Johny H.
 Sample, Anna
 Samuelson, Kurt
 Sanders, Jeffrey M.
 Sather, Tom & Pat
 Savinsky, Mark
 Scalia, Joseph III
 Scanlin, Betsy
 Schimpff, Wayne
 Schrag, Loren
 Schwarzrock, Wes
 Seder, David
 Seekins, Larry
 Sheller, Ruth H.
 Simmons, Lauren L.
 Smith, Jewell
 Smith, Jo
 Smith, Maureen
 Smith, Patrick
 Smoot, Bill & Suzanne
 Smoot, C. William MD
 Solheim, Carl
 Sorg, Keith
 Southworth, James O.
 Sparhawk, Erica
 Sparhawk, Ryan

Spencer, Al
 Splittberger, Gary
 Stange, Douglas
 Stearns, Gerry
 Stewart, Esther
 Stockton, Ken
 Strong, David
 Swanson, Nancy
 Sweeney, Donna
 Swierkosz, Joe & Becky
 Syring, John PhD
 Tafoya, Estelle
 Tafoya, Renee
 Tatz, Janet
 Taylor, Richard
 Tetrault, Marlene
 Timmerman, Jane
 Tingle, Walter W.
 Tomaszewski, Matt MD
 Tomaszewski, Nina MD
 Torrence, David B. & Ruth S.
 Tully, Tom
 Tussing, Darlene
 Unruh, Cal
 Valdez, Miguel
 Vorhes, Stacey M
 Waldron, Bob
 Walker, Carol
 Walters, Jeannette
 Walton, Kendall
 Waples, Virginia
 Webb, Barbara Dr.
 Webb, S. David Dr.
 Weber, Gordon G.
 Weeden, Catherine
 Weeks, Tom
 Wegner, Gary & Clore
 Wheeling, Terry
 Whittinghill, Joe
 Wiggins, Nancy
 Willett, Frank
 Williams, Dennis
 Williams, Kathy
 Williams, Linda or Ray
 Williams, Pauline
 Williams, Rebecca H.
 Williams, Steve
 Williamson, Milt
 Wilson, Bryan
 Wilson, Mamie
 Winslow, Susan R.
 Wood, Wilbur
 Woolard, Nancy

5.2 RESPONSE TO COMMENTS

What follows are individual or summarized comments for each of the subject areas identified through the content analysis process, as well as the response to those comments. If numerous similar comments were received on a topic, they were summarized into a single comment. The response to comments may be a direct response to the comment, or will note whether the comment was addressed by adding analysis or discussion to the FEIS.

CULTURAL RESOURCES

Subject: Cultural Resources		Response #: C-1, General
Letter-Comment #: 47-2	You admit that "...that the significance of the Pryor Mountain Unit to the Crow could not be overemphasized," (3-54), and that "Crow Cultural Commission Chairman George Reed states that motorized vehicles are threatening the sacredness, solitude and pollution free atmosphere of the Pryor, Arrow Shot Into Rock, Mountain, the last sacred place where individuals go for guidance and prayer without disturbance and interference" (3-61), and that, in general, motorized use threatens cultural resources (3-59), yet you do not recommend any significant reduction in OHV use. Instead, (Table 3-8) you recommend an INCREASE in "Motorized Recreation Opportunity."	
Response: Addition of Alternative B Modified addresses and analyzes the effects of increased motorized recreational opportunities on traditional cultural properties and cultural landscapes. It also provides additional protection measures related to increased visitor access associated with motorized access, by proposing to not designate additional key routes.		

Subject: Cultural Resources		Response #: C-2, Traditional Cultural Properties
Letter-Comment #: 116-2	Did you even ask for input of the Native American's that leave in Pryor how they feel about this?	
Response: Under the Traditional Cultural Properties section in the FEIS, consultation with the Crow Tribe and others is described in the methodology section.		

Subject: Cultural Resources		Response #: C-3, National Historic Preservation Act
Letter-Comment #: 461-22	The consultation requirements under the NHPA have not been met and should be fulfilled before the final EIS and decision are issued. At a minimum, any route that has not been properly inventoried should not be placed upon the MVUM until such inventory occurs and the effects of the route and increased access to an area are determined and minimized.	
461-24	Cultural resources do not receive sufficient protection in any of the proposed alternatives and the proposed alternatives do not comply with the requirements of the National Historic Preservation Act, 16 USCS § 470f or the direction in EO 11644, as amended by EO 11989, to "minimize impacts" to cultural resources. These deficiencies should be remedied before the final EIS and decision notice is issued.	
461-27	The draft EIS frequently states that Alternative B "may reduce" or "may threaten" certain cultural resources. These uncertainties should be more fully disclosed and alternatives suggested for reducing the uncertainty that appears to dominate the future protection of these irreplaceable resources. If additional public access in the Beartooth Christen Ranch road "may threaten" the preservation of these resources, then additional public access should not be allowed until it is certain what the threat is and that the threat has been eliminated. If it is absolutely necessary that this road remain open to motorized access, then an Adaptive Management Plan should be put into place, as described above.	
Response: Washington Office protocol to comply with the National Historic Preservation Act was followed as described in the Cultural Resource section of the FEIS. Additional inventory and review of Alternative B proposed actions was conducted during the fall of 2007 and more detailed analysis of effects to cultural resources was added to each alternative. Please see sections in Chapter 3 Cultural Resources under Regulatory Framework and methodology.		

Subject: Cultural Resources	Response #: C-3, National Historic Preservation Act
Sites that may be at risk due to a variety of circumstances will be monitored as per the Site Identification Strategy (SIS) as part of the Programmatic Agreement. Cultural resource site monitoring will continue and if effects to cultural resources are observed, regardless of the source, plans to remove, reduce or mitigate the effects will be pursued.	

Subject: Cultural Resources	Response #: C-4, Route #2088 (Shriver Peak) & Route #2095A
Letter-Comment #: 124-12	The proposal to close the Dry Head Loop is good; this will help protect cultural resources in that area. Similarly, route 2095A should be designated as a non-motorized trail.
129-18	The Pryors Coalition also strongly recommends against opening #2088 to motorized use. This area could, like Punchbowl, be good secure habitat for deer and elk. The Pryors Coalition 9 Road #2088 also goes through some culturally sensitive areas. In the Cultural Resources part of the DEIS the Forest expresses concern about both Alternatives B and C.
129-19	This discussion is partly in error since route #2095A is not open to motorized travel in Alternative C. Nevertheless this cultural concern suggests that the entire route #2088 should be closed to motorized use. This situation is similar to the situation at Dryhead Overlook, so the same solution might be appropriate. Close #2088 and construct a few short walking trails. Trail construction would be so easy here that it would be almost unnecessary.
307-24	The Forest Service has said that the Travel planning process does not allow them to designate non-motorized areas as suggested by the Pryors Coalition proposal. However, there is nothing preventing the Forest Service from not designating roads through the middle of these suggested areas so that they may be designated later in the Forest Planning process. For this reason, Road 2088 past Crater Ice Cave, Road 2093 (Cave Ridge Road), Road 20972 on Roberts Bench, and Road 2144 in the Punchbowl area should be closed. Closing these roads would also provide much needed secure wildlife habitat and in the case of Road 2088 protect the existing cultural resources.
307-26	The Forest Service should be commended in Alternative B for closing (or not authorizing) Road 2308B to Dry Head Vista to protect the cultural resources. The same potential for abuse also exists on Big Pryor Mountain in the Crater Ice Cave area, and the Forest Service should consider a similar closure.
461-29	Motorized access to the Shriver Peak area should not be allowed, based upon the statement that “Any increase in access to this area threatens the pristine site setting and introduces the likelihood of vandalism, much as is occurring to the Dryhead Overlook TCP features.” (DEIS p.3-65). There is no real discussion of how these resources will be benefited or protected from degradation by the proposed alternatives. There is insufficient discussion of mitigation and monitoring, and no plan of action if resources are continued to be damaged. Even though the DEIS acknowledges that the importance of the Pryor Mountain Unit to the Crow tribe cannot “be overemphasized” (DEIS p. 3-54) there is little indication that the effects of motorized access to the resources of the Pryors were fully assessed.
461-32	It is also unclear why a loop that is projected to be quite popular to motorized use is being designated in this sensitive area. It is unrealistic to believe that damage will not occur in one area that is already occurring at many others.
Summary of Comments: Concern the designation of motorized use on Route 2088 and 2095A will not protect cultural resources.	
Response: The Forest Service considered additional options for routes 2088 and 2095A. Alternative B Modified does not designate a segment of route #2088, which offers additional protection for cultural resources and reduces effects to the cultural landscape. Refer to the Cultural Resource section in the FEIS, Alternative B Modified.	

Subject: Cultural Resources	Response #: C-5, Monitoring
Letter-Comment #: 461-26	This general reference cannot be described as sufficient disclosure of the monitoring or mitigation that will occur to protect these resources. What methods will be used to minimize impacts? How frequent will monitoring rotations be? What actions will be taken when damage to resources occurs? An adaptive management plan should be put in place with specific thresholds for what constitutes damage and when those thresholds are met, the area is automatically closed until the damage and the source of the damage is eliminated, as is required by EO 11644, as amended by EO 11989.

Chapter 5: Response to Comments

Subject: Cultural Resources	Response #: C-5, Monitoring
<p>Response: The Custer National Forest site monitoring program documents effects to cultural resources due to a variety of causes, including natural and human factors, based upon baseline conditions and professional opinion. When effects to cultural resources are observed, the Forest Archaeologist, in cooperation with the appropriate resource specialists and in consultation with the Montana State Historical Preservation Officer (SHPO), designs plans to remove, reduce, or mitigate the effects. For travel management, a specific Site Identification Strategy (SIS) as part of the Programmatic Agreement will be developed with the SHPO in a concerted effort to monitor site condition and also identify any new sites that could be affected by this decision. This strategy is described in the Cultural Resource section in the FEIS.</p>	

Subject: Cultural Resources	Response #: C-6, Motorized vs. Non-Motorized Effects
Letter-Comment #: 412-4	Trails #2016, 2085P, 2085R, 2091D, 2091H, 2308B, 2849F are being closed for Cultural Resource concerns. What are the specific concerns? What studies have been carried out that links motorized access with vandalism of cultural resources? What can be done to limit the access to the culturally sensitive areas that doesn't include closing the trails? Will there be and has there been increased patrols or enforcement in these areas to protect these cultural resources?
419-4	In alternative B I find that so many of the closures are "due to cultural consideration" but does not address the issue of the horse or foot users causing problems.
421-25	Cultural issues, closing certain trails would make it difficult for Native Americans to access their historical sites. Instead of closing the trail completely, can we close the trail 1/2 of a mile before the historical sites to everyone including hikers and horse backers? Without knowing for certain who is causing the problem, it should be closed to everyone not just one specific group.
421-26	You stated that a road or trail needed to be closed because of OHV was getting into the natives sites and destroying the sites. We believe this is a biased statement! There is no reason why you should think all the damage is from OHV users! So trail #2095 and 20952 should remain open to with in a 1/2 mile of the site and closed to all people from entering the area or until the Forest Service can come up with a plan to minimize the impact on the sites and or remove the cultural objects remaining at the site and left with the Native Americans to care for them.
<p>Response: The Forest Service does not claim that all effects to cultural resources are due to OHV users. However, motorized access can increase the number of visitors to an area, which can increase the potential for impacts. Effects to cultural resources due to OHV use and/or access have been documented at specific locations and it is at those locations that the Forest is attempting to remove, reduce, or mitigate the effects.</p> <p>Alternative B Modified addresses specific concerns related to the protection and preservation of cultural resources. The Cultural Resource section in the FEIS describes the various studies concerning motorized vehicle effects to cultural resources; and what has been successful in reducing these effects. The site monitoring protocol for travel management may identify the need for increased law enforcement. Please refer to Chapter 3 Cultural Resources for more detailed discussions of impacts, studies of OHV effects, and mitigation measures.</p>	

Subject: Cultural Resources	Response #: C-7, Dispersed Camping
Letter-Comment #: 461-30	The "no action" alternative environmental consequences admits that "[t]he allowable motorized travel up to 300 feet off existing roads, in order to access dispersed camping areas, continues to result in damage to sites." (DEIS p. 3-51). However, the environmental consequences section for Alternative B, which allows a dispersed camping buffer of 600 feet, does not directly address or admit to the damage that is already caused by dispersed camping. Damage to cultural sites is currently occurring due to unregulated dispersed camping and the alternative adopted should greatly limit the access to dispersed camping by designating sites "sparingly" as directed in the 2005 Travel Management Rule.
461-31	Why is dispersed camping along the West Fork of Rock Creek, Main Fork of Rock Creek, and the West Fork of the Stillwater allowed if it will "continue to affect cairn features concentrated along these routes" (DEIS p. 3-64)? Further damage should be prevented to these features by allowing dispersed camping only at designated camping facilities along the West Fork of Rock Creek and the West Fork of the Stillwater that have been fully reviewed for their affects on cultural resources. Sites should only be designated on the Main Fork of Rock Creek if they will not "continue to affect cairn features."
<p>Response: Sentence should read "Dispersed vehicle camping activities...may affect cairn features...". A sample of 30</p>	

Subject: Cultural Resources	Response #: C-7, Dispersed Camping
dispersed camping areas along the Main Fork of Rock creek found four site locations of which one site was currently being affected. All four locations will be closed to dispersed camping. Inventory along the West Fork of Rock Creek and the West Fork of the Stillwater revealed a number of sites, but none are currently being affected by dispersed camping. Monitoring of these sites will continue and, should detrimental effects are found, measures to remove, reduce or mitigate these effects will be implemented in consultation with the SHPO as described in the site identification strategy (SIS) for travel management.	

Subject: Cultural Resources	Response #: C-8, State Historic Preservation Officer
Letter-Comment #: 461-21	In fact, in the Appendix that lists consulting entities, the SHPO is conspicuously absent.
Response: The Montana State Historic Preservation Officer has been added as a document reviewer/consulting agency.	

ECONOMICS

Subject: Economics	Response #: E-1, Spending Profiles - NVUM
Letter-Comment #: 67-14	Page 3-6: NVUM numbers. Survey period was 10/01 thru 9/02. Outdated statistics that do not reflect recent growth in OHV usage. Table 3-3: Activity Participation. How is it possible that snowmobile use has zero participation? Table 3-4: Expenditures by Activity. These numbers are inaccurate, especially since fuel prices have skyrocketed since the survey was conducted. Table 3-6: Employment and Labor Income Effects. "Motorized activities were responsible for approx. 22 total jobs...OHV use on forest...5 total jobs... Snowmobile ... 0 jobs." There are 15 OHV dealers in Billings alone and these numbers are significantly under-estimated.
Response: It is true that the most recently available spending profiles do not reflect the very recent increases in the price of gasoline. The next round of spending profiles will reflect these higher prices. This will be especially important in the economic impact area surrounding the Beartooth District because the economic impact area includes several refineries. This means that the economy will not only retain the retail and wholesale margins but most of the production price as well. Even if all expenditures in the expenditure profiles were doubled, the economic effect on the economy of the impact area would still be very small (less than 1/2 of 1 percent). However, that is not to say that certain individuals and businesses would not be adversely affected by changes in OHV use. The National Visitor Use Monitoring information displayed in Table 3-3 of the DEIS reflects the visitor survey work conducted on the Forest during fiscal year 2002. The survey dates and locations are selected at random based on areas of concentrated use, and involve obtaining information from visitors existing these sites. As with most surveys of this type, there are margins of error inherent within the project. This entire survey is available, including explanations about the margin of error, on the internet at: http://www.fs.fed.us/recreation/programs/nvum/ . A second round of NVUM surveys are being conducted in fiscal year 2008. As additional survey work is completed, the information gained from these surveys is expected to improve.	

Subject: Economics	Response #: E-2, Cumulative Effects
Letter-Comment #: 66-55	The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands must be adequately evaluated and considered in the decision-making....We request the evaluation of the economic cost of fewer motorized recreation opportunities on motorized recreationists and the significant cumulative negative effect of all travel management decisions that contribute to these social and economic impacts on motorized recreationists.
66-67	The evaluation and resulting decision must adequately consider and address all of the social and economic impacts associated with the significant motorized access and motorized recreational closures.

Chapter 5: Response to Comments

Subject: Economics		Response #: E-2, Cumulative Effects
66-72	We request adequate evaluation of the economic and social impacts of this proposed action be considered in the analysis and decision-making. Additionally, we request that the cumulative negative impact resulting from inadequate evaluation of economic and social impacts in past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.	
67-15	Please analyze the cumulative effects of all of the associated actions listed in Table 2 of our comments.	
387-31	CBU requests that a programmatic EIS be completed by Region 1 on the cumulative economic and social impact that the closures proposed in all forest travel plans in Region 1 are having on small communities.	
Summary of Comments: Concern that the economic analysis was not thorough or cumulative effects were not analyzed.		
Response: The economic and social impacts of changes in motorized or non-motorized opportunities are difficult to assess. A thorough analysis of these impacts would require detailed information on changes in recreation use by activity. This information is difficult, if not impossible to calculate since it involves speculation about the ability or desire of user's to substitute recreation activities and given recreation location choices. It is acknowledged that cumulatively, the changes in recreation management on multiple units has the potential to shift some motorized use to different locations on public and private lands and that this may have impacts on site specific businesses. The law does not require firm-level analysis of these impacts, and as stated above, they are extremely difficult to project. The analysis in the Economics section of Chapter 3 indicates that the proposed changes represent a small fraction within the context of the local economy. This also suggests that the cumulative contribution of this project to other economic changes locally or regionally would be minor.		

Subject: Economics		Response #: E-3, Data
Letter-Comment #: 420-7	The economic impact of the Pryors vs. the Beartooths is like comparing apples to oranges. The direct labor income analysis shown on Table 3-6 does not appear to be realistic. As stated in the DEIS: "Because the decisions of Travel Management will have little direct and indirect effects on the economic area, there should be no cumulative effects." Would the same conclusion stand if those decisions were based on better data?	
Response: FEIS Table 3.6 is based on recreation visits and average spending obtained through peer-reviewed studies and methodologies. At this point the estimates are for the entire Custer Forest, not specific districts or mountain ranges. It would be inappropriate to model economic impacts for an area smaller than the group of counties selected to represent the economy surrounding the Custer National Forest, and if this were attempted the multipliers would be much smaller because fewer industries would be included. While all estimation procedures are subject to error, the statistically valid sampling regime used for this analysis allows estimation of this error. Even if the numbers used in the analysis were all doubled, all recreation would still account for only less than 1 percent of total economic activity in the impact area.		

Subject: Economics		Response #: E-4, IMPLAN Modeling
Letter-Comment #: 66-56	The economic impact of these closures will be devastating to small communities throughout the West. Models can be manipulated to predict any result. Economic models such as Implan should not be used when the input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.	
387-5	The forest travel plans that are going on around Montana are using generated, estimated and false data to forward an agenda of locking people out of the forest. The economic impact of these closures will be significant and devastating to small communities throughout Montana. As required by the Presidents Council on Environmental Quality, some degree of effort must be used by the Forest Service to gather true on the ground data from businesses and individuals that use our public lands. This has not been done by your forest in preparing the travel plan document. Please use actual local data as to the economic and social impact of your proposed closures. The Custer National Forest is using the IMPLAN Pro input-output modeling system for the economic analysis. As stated in the Custer DEIS on page 3-9, the information that is put into this system is estimated and generated numbers. CBU finds that the input amounts do not reflect the true	

Subject: Economics		Response #: E-4, IMPLAN Modeling
	economic data that would be used if actual surveys of business were used. We see no effort being made by your forest to gather true information as required by the CEQ. The output from the IMPLAN modeling system can only be as good as the data that is plugged into the model. Arbitrary results from estimated and generated input data should not be used. True on the ground economic data must be collected and used.	
411-28	The IMPLAN modeling plan is estimated data and has not involved real on the ground economic input from the public and businesses in the area of the CNF. This is not accurate data and has excluded the public from fair and accurate input for public process and review.	
<p>Response: Input output IMPLAN modeling is an accepted modeling tool in the field of economic and is used by the Forest Service to estimate the economic impacts of changes in management. The model relies on actual data of interactions between industries in the study area as recently as 2002. It is fortunate to have any visitor use information for this area, such as the 2002 National Visitor Use Monitoring information. Attempting to comprehensively survey all visitors would be logistically impossible and intrusive. On the ground field checking of motor sports stores in central Montana confirmed that the IMPLAN estimates are realistic. It is important to realize that these estimates are not intended to be perfect predictors of economic activity in the future, as they are restricted to evaluation of management changes with an assumption of a static economic background, which we know to be oversimplified.</p>		

Subject: Economics		Response #: E-5, Expenditure Profile
Letter-Comment #:		
214-5	Table 3-4, pages 3-8 is not complete it does not reflect all the uses on the forest from table 3-3.	
362-5	Limiting OHV travel in the area will also remove the economic impact these users have on the surrounding communities.	
411-25	Did Stynes and White take local on the ground spending profile surveys for their Spending Profiles for National Forest Recreation Visitors by Activity spending profile? Horseback riding does not share the same spending profiles as other non-motorized activities on the forest.	
411-26	The cost expenditures for a horseman of \$12 for a local person (50 miles within the forest boundary) And \$35 for a non-local person (beyond 50 miles from the forest boundary) are inaccurate.	
421-24	On page 3-8 in Table 3-4, we question how the Forest Service arrived at the expenditure costs per visit? Considering the cost of gas today, you can not even fill a snowmobile for \$28.00, did you figure in the cost of fuel to even arrive at the launch point for snowmobiling or what about the cost of food being carried with each person for example for lunch? If the cost is inadequate for snowmobiling, it carries that the other expenditures per visit are incorrect as well. We feel this table to be grossly inadequate and should not be used.	
<p>Summary of Comments: Question the numbers used for cost expenditures.</p>		
<p>Response: Even if all expenditures in the expenditure profiles were doubled, the effect on the economy of the impact area would still be very small (less than 1/2 of 1%). However, that is not to say that certain individuals and businesses would not be adversely affected by changes in OHV use.</p>		

Subject: Economics		Response #: E-6, Trail Closure
Letter-Comment #:		
421-22	How can you close down large percentages of trail systems and not have an impact on the economy of the local communities?	
<p>Response: It appears this commenter is concerned with motorized opportunities based on other comments in their letter. The preferred alternative, Alternative B Modified, would not designate approximately 7% of system and non-system motorized routes compared to the No Action Alternative. In comparison, the preferred alternative, Alternative B Modified, would not designate approximately 22% of system and non-system motorized routes currently being used under the existing condition Alternative A. The contribution that motorized and non-motorized recreation activities on the District have on area economics is less than 1/2 of 1%. Consequently, the resulting effects from any of the action alternatives on the overall economic impact area would be extremely small as indicated in the Economics section of Chapter 3.</p>		

Chapter 5: Response to Comments

Subject: Economics		Response #: E-7, Recreational Economic Contributions
Letter-Comment #: 66-115	We request that the positive benefits of OHV recreation and tourism be considered as part of the evaluation and implemented for this action.	
74-8	Economic development in and around Custer National Forest would increase and greatly benefit our communities if we had a more developed motorized trail system with varying degrees of length and difficulty.	
438-4	Future 'possibilities' opportunities for the future of the towns and counties that surround these mountain ranges must be evaluated. Local merchants should be contacted or interviewed. The 'gray' wave of snowmobiles and ATV riders makes it imperative that object evaluation of the economic possibilities for the next 10+/- years be evaluated. While Montana people may not want development to the extent of the Paiute Trail in Utah, the possibility of a positive economic boost to the small communities in the surrounding the mountain areas should be 'objectively evaluated'.	
<p>Response: The analysis evaluated the economic effects of a range of alternatives related travel management planning. The contribution that motorized and non-motorized recreation activities on the District have on area economics is less than ½ of 1%. Please see the Economics section of Chapter 3 for more information about the extent of recreation economic impacts.</p> <p>The Forest Service is not required to evaluate the motorized recreation economic development potential for communities. The inclusion of economic impacts is optional and done to help the decision maker become aware of estimated economic impacts associated with proposed management.</p>		

Subject: Economics		Response #: E-8, Spending Profile – Local Economy
Letter-Comment #: 155-4	"In general, economic effects vary by the amount of spending and by the type of activity, but it cannot be generalized that motorized or non motorized activities contribute more or less to the local economy on a per visit basis." I do not believe this statement accurately displays visit preparation costs and actual economic exchange to the local economies. If you consider what the motorized community spends in equipment costs compared to the non-motorized before going and actual visits to the forest it will be very difficult to say the motorized users do not contribute by far more in employment and labor income to the local economies.	
<p>Response: Spending profiles do not include expenditures on durable goods (e.g., ATVs, horse trailers) or fixed costs (such as vet care, taxes property, etc.). These items can be used on multiple trips and cannot be solely attributable to a specific trip. Given this issue, the economic impact analysis uses only trip-related expenditures. This analysis approach yields technically correct estimates of the economic impacts that are attributable to recreation use in a local economy.</p>		

Subject: Economics		Response #: E-9, Expenditure Profile – Economic Impact
Letter-Comment #: 348-2	Limiting OHV travel in the area will also remove the economic impact these users have on the surrounding communities. A typical family riding motorcycle on trails in the Custer National Forest will spend approximately \$75.00 per day on gasoline and miscellaneous purchases. If they are traveling to the area for a weekend, their costs are increased.	
<p>Response: The dollar figures shown are for visits (per person), not per trip which would be more. Also, even if all expenditures in the expenditure profiles were doubled, the economic effect on the economy of the impact area would still be very small (less than 1/2 of 1%). However, that is not to say that certain individuals and businesses would not be affected by changes in OHV use.</p>		

Subject: Economics		Response #: E-10, Spending Profiles - Fuel
Letter-Comment #: 411-27	A truck pulling a horse trailer uses 3 times more fuel for the same mileage traveled than a car that a hiker uses. Also the amount of money to purchase truck, trailer, horses, tack, feed, vet care, taxes, licenses, property to maintain stock all far excide (sic) the costs of all other non-motorized spending profiles. This shows that the spending profile is arbitrary and capricious.	
Response: The spending profiles for all activities reflect the amount of money spent on gasoline to participate in these activities. However, we did not have a spending profile for horse back riding that was applicable to this area so we used the same profile as for hiking and biking. This would tend to underestimate the amount of money spent on gas for horse back riding. However, even if all expenditures in the expenditure profiles were doubled, the economic effect on the economy of the impact area would still be very small (less than 1/2 of 1%). Additionally, spending profiles do not include expenditures on durable goods (e.g., ATVs, horse trailers) or fixed costs such as vet care, taxes property, etc.). These items can be used on multiple trips and cannot be solely attributable to a specific trip. Given this issue, the economic impact analysis uses only trip-related expenditures. This analysis approach yields technically correct estimates of the economic impacts that are attributable to recreation use in a local economy.		

Subject: Economics		Response #: E-11, Existence Value
Letter-Comment #: 445-5	As an economist I am impressed with the economic analysis that was done. But remember it shows that the off road industry has minimal impact on the local economy. But even more importantly the analysis ignores the value of the Beartooth District. That is what economists would call "existence value."	
Response: The economic analysis in this document does not attempt to quantify existence value (which is a term used to label a portion of the non-market values to many people). Contemporary methods to estimate these values are subject to large variability based on the instrument used, the antecedent awareness of the area by respondents, and the sample population surveyed. Generally speaking, willingness to pay estimates from contingent valuation approaches are used for relative comparisons, and not considered valid estimates in themselves. It is unclear from the comment whether the commenter is expressing concern that the existence values people hold for this area will be reduced or elevated by changing travel management as prescribed in the various alternatives. Many non-market values are addressed in the various resource sections of this document.		

Subject: Economics		Response #: E-12, Benefit Cost Analysis
Letter-Comment #: 66-73	We request that the analysis include an adequate benefit-cost analysis of non-motorized versus motorized trail use.	
Response: The economics section provides statistically valid estimates of spending by person for various activities. This information is useful in projecting how spending might change in response to management. A detailed benefit cost analysis of motorized versus non-motorized trail use would require making gross assumptions on how patterns of use might change given the alternatives. Therefore, any analysis based on such speculative assumptions would provide little or no useful information.		

FISHERIES AND AQUATICS

Subject: Fisheries and Aquatics		Response #: F-1, Aquatic Habitat
Letter-Comment #: 396-13	Cutthroat trout habitat has also been cited as a documented concern. The vast majority of the stream crossing on trails in the CNF are rock-based and thus the result is very little sediment disturbance. The remaining stream crossings could easily be renovated by donated labor by placing a rock base in the streambed crossing, thus eliminating sediment disturbance.	
461-52	The DEIS did not adequately analyze the potential impacts to fisheries from stream crossings due to an improper assumption: "Because crossings generally comprise a very small percentage of the total stream or riparian corridor, effects are generally minimal for the stream as a whole... Thus, this component of the issue is addressed for roads or trails that follow stream courses, and for roads or trails with numerous crossings." (DEIS p. 3-109). The decision not to analyze single stream crossings is arbitrary and capricious, and in violation of the NEPA duty to fully analyze the impacts of the proposed action.	
Response: The potential for routes to impact water quality and fish habitat was evaluated in the Water Quality and		

Chapter 5: Response to Comments

Subject: Fisheries and Aquatics	Response #: F-1, Aquatic Habitat
<p>Fisheries sections of the FEIS based on the number of stream crossings, adjacency to streams, and landtype erosion hazard. More specifically, stream crossing in erosive landtypes were assigned a higher risk value than crossings less susceptible to erosion. For example, a highly erosive landtype with one or two stream crossing would receive a risk value similar to a route in a less erosive landtype with several more crossings.</p> <p>Mitigation measures can be implemented at site specific stream crossing to address fisheries concerns. However, the scope of this project is limited to the designation of system roads and trails. Proposed actions with site specific effects that potentially increase impacts to water quality and aquatic habitat would be mitigated in Alternative B Modified. Construction, reconstruction, maintenance and decommissioning proposals will require future and separate NEPA decisions. Appendix E includes opportunities to reduce impacts to water quality and aquatic habitat where there are: 1) site specific impacts from existing routes not associated with the proposed action, and 2) proposed actions with potential to improve conditions but do not eliminate impacts. Implementing mitigation measures to address opportunities will require future and separate NEPA decisions.</p>	

Subject: Fisheries and Aquatics	Response #: F-2, Route #241412
Letter-Comment #: 40-14	<p>Table 3-40 and table 3-41 (pages 3-112, 3-114) indicates that roads and trails are also impacting streams with populations of sensitive aquatic species, such as Yellowstone cutthroat trout, Western boreal toad, and Northern leopard frog, (Table 3-40, page 3-112). Table 3-42 shows routes with higher risks to fish and amphibians, however, only one of these routes appear to be designated for motorized travel (#241412). We recommend that this route be relocated away from stream and/or designated for non-motorized travel to reduce potential impacts to the stream and aquatic species.</p>
461-57	<p>The DEIS states that the preferred alternative “proposes to add 4.1 miles of moderate and high risk non-system routes. . .Of these routes, road 241412 has potential for impacting sensitive species and their habitats.” (DEIS p. 3-115). In order to comply with the mandate to minimize impacts under the E.O.s the Custer NF should remove this route from their preferred alternative.</p>
<p>Response: Route #241412 is not designated for motorized use in the preferred Alternative B Modified in the FEIS.</p>	

Subject: Fisheries and Aquatics	Response #: F-3, Fish Passage
Letter-Comment #: 40-15	<p>Has the Custer NF and Beartooth Ranger District evaluated or conducted a survey of fish passage on culverts on the District? Since culverts often impede fish passage we recommend that such a survey be conducted to identify culverts causing passage problems. A priority list of culverts requiring modification or replacement should then be developed.</p>
461-53	<p>Another false assumption is that “Because fish passage has been addressed through the Forestwide culvert inventory and fish passage analysis, and because impacts can be mitigated through facility design or replacement, this component of the aquatic issue is dismissed from further detailed analysis in this report.” (p. 3-109). The DEIS should at least look at where the mitigation needs to occur and how the change in the transportation system will impact those needs. Merely stating that they will be mitigated and then not explaining how or detailing the potential needed changes due to increase in motorized use at these stream crossings is arbitrary and capricious.</p>
<p>Response: The Custer National Forest has evaluated fish passage at culverts in the analysis area as part of a previous study. This inventory was documented in the DEIS and FEIS (Fisheries, Affected Environment, Habitat Fragmentation). The results indicated that very few culverts were blocking adult fish passage, and few of these appeared to be causing any significant harm to fisheries. Fish passage needs have been prioritized, and structures replaced annually to provide aquatic organism passage. The scope of the travel plan is limited to the designation of roads and trails. Construction, reconstruction, maintenance and decommissioning proposals will require future and separate NEPA decisions.</p> <p>Appendix E includes opportunities to reduce impacts to water quality and aquatic habitat where there are: 1) site specific impacts from existing routes not associated with the proposed action, and 2) proposed actions with potential to improve conditions but do not eliminate impacts. Implementing mitigation measures to address opportunities will require future and separate NEPA decisions.</p>	

Subject: Fisheries and Aquatics		Response #: F-4, Mode of Travel
Letter-Comment #: 461-51	We assert that the “mode of travel” is important when determining the amount of sediment production, in addition to the “facility” (road or trail).The DEIS does recognize the need to evaluate different uses: “...some uses have higher potential to disturb soils and increase erosion potential on both roads and trails, and therefore segregation of uses is maintained throughout the report.” (DEIS p. 3-106). In order to adequately analyze the erosion potential for different uses, the roads and trails need to be segregated as well since each trail class and road maintenance level have different erosion potentials and therefore different mitigation needs.	
<p>Response: Potential effects of individual routes (high and moderate risk) are disclosed in indirect effects tables in the FEIS (Fisheries and Aquatics Section, Environmental Consequences). Discussion of effects on aquatic resources in relation to mode of travel is also disclosed in the FEIS (Fisheries and Aquatics Section, Affected Environment).</p> <p>The potential for routes to impact water quality and fish habitat was evaluated in the Water Quality and Fisheries sections of the FEIS based on the number of stream crossings, adjacency to streams, and landtype erosion hazard. The assigned route risk value produced from this analysis is not intended to predict an absolute value or level of impact to water quality or aquatic systems, rather a hierarchical approach to prioritizing impact potential.</p>		

Subject: Fisheries and Aquatics		Response #: F-5, Opportunities
Letter-Comment #: 461-54	In order to ensure the accuracy of the Custer NF’s environmental analysis of aquatic systems, the Custer NF must provide a plan and implementation schedule to remove all non-system routes once the MVUM is released. Without such a plan the analysis would be based on a false assumption that all non-system routes not designated in the MVUM would have negligible environmental impacts.	
<p>Response: The scope of this project is limited to the designation of system roads and trails. Proposed actions with site specific effects that potentially increase impacts to water quality and aquatic habitat would be mitigated in Alternative B Modified. Construction, reconstruction, maintenance and decommissioning proposals will require separate NEPA decisions. Appendix E includes opportunities to reduce impacts to water quality and aquatic habitat where there are: 1) site specific impacts from existing routes not associated with the proposed action, and 2) proposed actions with potential to improve conditions but do not eliminate impacts. Implementing mitigation measures to address opportunities will require future and separate NEPA decisions.</p>		

Subject: Fisheries and Aquatics		Response #: F-6, Dispersed Camping
Letter-Comment #: 461-56	Finally, the DEIS failed to analyze the impacts to fisheries and aquatics from the dispersed camping exemption. The preferred alternative will allow this exemption on all but two routes across the entire planning area, yet there is no mention of where dispersed camping could intersect with fisheries habitat for sensitive or management indicator species. In order to comply with NEPA, the Custer NF needs to analyze this issue for direct, indirect and cumulative impacts.	
<p>Response: Effects of dispersed camping to fisheries and aquatic resources, under all alternatives, are disclosed in the FEIS (Fisheries and Aquatics Section, Environmental Consequences).</p>		

Subject: Fisheries and Aquatics		Response #: F-7, Cumulative Effects
Letter-Comment #: 461-58	“Under all action alternatives and for all watersheds in the analysis area (including non-sensitive species occupied watersheds), actions that do not reduce risk to aquatic systems for moderate and high risk routes are minimal and in most cases are offset by actions that reduce risk (see Water Quality Section).” (DEIS p. 3-118). This reasoning asserts that it is acceptable to designate motorized use on moderate and high risk routes because impacts will be offset by other beneficial actions. The DEIS did not adequately demonstrate that these actions will in fact reduce water quality risks. Furthermore, actions that introduce fine sediments into water quality limited segments for sedimentation are still Clean Water Act violations ¹⁰ even if supposedly offset in other segments. This sentence seems to say that the agency can degrade some sections because others will improve.	
<p>Response: Cumulative effects are defined as "the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable actions, regardless of what agency or</p>		

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Subject: Fisheries and Aquatics	Response #: F-7, Cumulative Effects
<p>person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (CFR 40 1508.7).</p> <p>The comment pertains to the following statement in the DEIS (Fisheries and Aquatics Section, Environmental Consequences): "Under all action alternatives and for all watersheds in the analysis area, actions that do not reduce risk to aquatic systems for moderate and high risk routes are minimal and in most cases are offset by actions that reduce risk." The intent of this statement was to provide rationale for differentiating potential cumulative effects to aquatic habitats among alternatives at the watershed scale and was not intended to infer that any level of impact to water quality or aquatic resources is acceptable.</p> <p>The scope of this project is limited to the designation of system roads and trails. Proposed actions with site specific effects that potentially increase impacts to water quality and aquatic habitat would be mitigated in Alternative B Modified. Construction, reconstruction, maintenance and decommissioning proposals will require future and separate NEPA decisions. Appendix E includes opportunities to reduce impacts to water quality and aquatic habitat where there are: 1) site specific impacts from existing routes not associated with the proposed action, and 2) proposed actions with potential to improve conditions but do not eliminate impacts. Implementing mitigation measures to address opportunities will require future and separate NEPA decisions.</p>	

HUMAN ENVIRONMENT

Subject: Human Environment	Response #: H-1, Environmental Justice
Letter-Comment #: 66-66	<p>Evaluations and decisions have been limited to natural resource management issues. Issues associated with motorized access and motorized recreation must be adequately addressed during the evaluation and decision-making including social, economic, and environmental justice issues. We are concerned that issues cannot be restricted to just those associated with natural resources. Access and recreation on public lands are essential needs of the public in Montana and we respectfully request that issues associated with the human environment be adequately addressed.</p>
66-70	<p>These and other socio-economic and environmental justice issues are obvious. The Forest Service is not exempt from the requirement to adequately address these issues in the evaluation and decision....We request that the proposed action comply with the Council on Environmental Quality (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf) recommendations in order to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to including:...The cumulative negative impact of all closures on motorized recreationists are significant and warrants a revised strategy to deal with the issues surrounding this condition...To date, all of these factors have not been adequately examined with respect to motorized recreationists and the trend of excessive motorized access and recreational closures....Motorized recreationists have not had the opportunity to develop mitigation plans required to address the significant impact resulting from cumulative effect all closures.</p>
66-128	<p>We request that the environmental document adequately addresses the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation.</p>
<p>Response: The Travel Planning team has evaluated other resource management issues as well as the social, economic and environmental justice issues. All alternatives address the desire for multiple-use access and recreational use.</p> <p>The discussion that motorized recreationists should be identified as an environmental justice-covered population is not valid. Executive Order 12898 specifically deals with low-income and minority populations as the subject of this order.</p> <p>Environmental Justice was address in the DEIS, section 3.1.3. No effects to the well-being and the health of minorities and low income groups were identified during scoping and the proposed action would not disproportionately affect minority or low-income populations.</p>	

Subject: Human Environment		Response #: H-2, Desired Type of Use
Letter-Comment #: 27-3	However, hunters, hikers, horseback riders, and others are affected by OHV use and Alternative B does not allow adequate space for these uses to occur simultaneously.	
40-19	We support increasing opportunities for non-motorized uses such as viewing wildlife or natural features in solitude. We believe motorized activities should be limited so that they only occur in a manner and location that minimize effects to other public uses, and are consistent with protection of natural features, wildlife, and other resources. This provides further reason for our support of Alternative C since it provides greater limitations on motorized uses to allow greater levels of protection for wildlife, natural features, and other resources that are used by the public.	
48-3	None of the alternatives does a very good job of separating users and providing adequately size areas for competing uses.	
67-16	The Travel Planning Process allows closure of a route due to user conflicts. It is our position that such conflict can be resolved by closing the route to either conflicting party. It is inappropriate that conflicts always be resolved by closure to motorized users. Closure to hikers or stock users is an equally effective resolution.	
163-5	Little, if any, discussion is found in the DEIS conflicts between OHV users and quiet recreationists. OHV users don't seem to notice the commotion, noise, dust and disturbance they create and leave in their wake or realize the negative effects it has on quiet recreationists. Clouds of noise, dust and disturbance radiate over a large area.	
Summary of Comments: Commenter suggest motorized and non-motorized uses be separated.		
Response: The Forest seeks to provide a wide range of uses that include motorized and non-motorized opportunities for the recreating public. Alternative B Modified provides a variety of motorized and non-motorized opportunities that address the perceived conflicts. It is unlikely that any alternative could resolve the conflicts between individual values.		
There is no documentation of user conflicts on specific routes. Conflict was not used as criteria for route evaluation.		

Subject: Human Environment		Response #: H-3, Documentation of Conflicts
Letter-Comment #: 66-149	We are unaware of any documented or justifiable reports of user conflict in the project area. We request copies of any documentation of user conflicts in the area and request that it be categorized and weighed against the overall number of visitor-days to the area.	
74-7	..what is the degree and frequency of conflict of use? We have never experience conflict of use in 11 years.	
387-3	...there is no significant documental evidence to support conflict of uses on individual routes.	
396-8	Does the CNF have any non biased user survey results that prove that a significant amount of user conflict exists? Or is the user conflict rationale just a perceived problem that is used to restrict motorized access?	
411-29	Does the CNF have documented record of conflict issues? If the CNF has the above records or not, how has the CNF dealt with possible issues?	
411-30	Define a conflict issue and its importance to travel plan processes?	
411-32	Is the separation of user groups on trails, roads, recreational areas, and camping areas a highly recommended way by the CNF to reduce potential conflict over other forms of management such as education?	
411-33	Was the above CNF survey used as a potential info. Gathering a process to see if there was potential conflict on the CNF?	
421-12	What kind of conflicts and between which groups do you have record of? ... Using conflicts is not a rational reason to close trails to motorized use if the Forest Service has not done any mitigations to solve this problem if there is indeed a problem.	
Summary of Comments: Is there a documented record of conflict?		
Response: There is no significant documentation of conflicts on the Forest. Conflict was not used as criteria for route evaluation. However, public comments associated with this project indicate that there are very differing personal preferences related to the amount and types of motorized recreation opportunities that should be provided.		

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Subject: Human Environment		Response #: H-4, Sense of Place and Motorized Access
Letter-Comment #: 66-81	The continual loss of motorized access and recreational opportunities is seriously degrading the local culture and quality of life. Public land is a cultural resource and access to the project area for many uses is part of the local culture. The decision for this project must consider the impacts that any closures will have on this culture....We request that the evaluation and proposed action adequately address this condition and not contribute further to this cumulative negative impact because it is already having a major impact on motorized recreationists.	
Response: The human environment as a part of the recreation resource was identified as a significant issue and was analyzed in the EIS (see Human Environment portion of the Recreation Section of Chapter 3).		

Subject: Human Environment		Response #: H-5, Route by Route User Conflict
Letter-Comment #: 461-13	The threshold established with this reasoning is flawed in that the determination of an unacceptable degree of conflict would only occur in the event that one user was entirely precluded from opportunities in line with their values across the whole planning area. Unfortunately, the DEIS failed to show a route-by-route analysis of the potential for user conflicts, and instead gave a listing in Appendix C of each route with a column for specific rationales. Providing a rationale does not substitute for a hard look analysis that is required under NEPA.	
461-14	Yet there is no corresponding list of routes where people identified the potential for user conflicts or where exclusive nonmotorized use could be agreed upon. It would be reasonable to assume that those routes not agreed to for designated motorized use would have the potential for user-conflicts. However, there is no alternative analyzed that measures or even describes the potential for user conflict on these routes. Nowhere in the DEIS does the Forest Service demonstrate that each proposed route change was analyzed in order to minimize user conflicts as required by EO 11644 as amended by EO 11989.	
Response: The Forest Service adhered to NEPA and the EO's. Comments reviewed from scoping, collaboration, and DEIS public review period indicated a general philosophical conflict between motorized and non-motorized uses rather than from route specific use conflicts. A route-by-route review was completed but no routes were closed due to conflict.		

IMPLEMENTATION AND ENFORCEMENT

Subject: Implementation and Enforcement		Response #: IMP-1, Motorized Enforcement Plan
Letter-Comment #: 34-2	While I have objections to allowing some motorized use in the Pryor's (or any other mountain areas) I don't feel that they should be the dominant use. Lack of enforcement of regulations will continue to pose a problem and unless that issue is also addressed we will continue to have rampant overuse by off-road vehicles in the Pryors and elsewhere.	
40-17	In addition, we support adding law enforcement personnel to handle the increase in motorized uses on the District. We particularly recommend increasing enforcement officer contact with off-road vehicle users and increasing enforcement staffing on holidays and weekends.	
41-9	If the enforcement level is the same in Alternative A and B (as claimed in Table 3-76, page 3-197) then enforcement in Alternative B will be spread thinner and be less effective. Ineffective enforcement will lead to more resource damage that will require even more funding and staff time to correct.	
48-2	Enforcement has been nearly absent up to this point and there is nothing to show that it will improve after the new plan is implemented.	
66-141	We request the agencies to support and use mitigations and education as a means to address and mitigate problems rather than closures....We request the full use of education to address visitor problems. Additionally, individual motorized recreationists and groups can be called upon to assist with the implementation of the educational process.	

Subject: Implementation and Enforcement	Response #: IMP-1, Motorized Enforcement Plan
66-146	We recommend that the Travel Plan Map and Visitors Map be the same and that this combination map should include as much detail as possible (such as contour information) so that the public can better determine the location of roads and trails that are open or closed.
68-41	No matter how many MVUMs you distribute there are roads that need to be signed as closed to all vehicles. For example the west terminus of 2308G and the trail up Bear Canyon.
74-11	More clearly marked/named trails would increase compliance.
82-2	Block off the unauthorized “roads”, fine those who don’t follow the rules, make it miserable for them, but leave the right to use the Pryor’s to the people to who it belongs, the citizens of this country.
86-2	Focus on doing a better job policing and penalizing those who break the rules.
88-2	A more stringent plan is needed and above all serious consequences need to be placed upon those violators. Enforcement is the absolute key to which every plan is adopted. How can these new regulations be strictly enforced?
95-3	In your plans please increase the funding to allow more full time and part time personal to be directly involved with the enforcement of this new plan.
97-11	Police action is required, Patrols “voluntary motorized” and “voluntary naturalist” are possibilities. Education and Respect must be taught.
99-1	I feel that one of the biggest problems we have it that is very difficult to tell when you are on a designated trail or not. I think that if there is clear designation, most people would know what is expected of them and it would be much easier to obey the rules.
115-1	You must limit these destructive machines access and impose stiff fines for riding off trail.
124-23	Unless we missed it, we did not see any commitment to increased law enforcement directed at the ATV problem in the Travel plan.
161-9	(1) If the 1987 Plan is the root cause for lack of enforcement, The District should issue Forest Supervisor’s interim orders to correct the document. (2) Enforcement must be a priority item in the District Program of Work. (3) Enforcement and education action must be spread throughout all field going personnel in the organization. (4) The District must have a presence in the Pryors, to start the enforcement and education process. (5) Evaluate the current blanket application of the 300 foot rule for access to disbursed campsites and apply it sparingly as per direction in the 2005 Rule.
193-3	Educating all ATV and other road drivers of the proper etiquette on our primitive roads may go along way to keep all drivers on established roads only and not out making another unintended road.
232-3	... the enforcement agencies lack the personnel to catch and control these (mythical, I think) “minority outlaws”.
232-4	The expected continuing paucity of money for enforcement and remediation is discouraging: doesn’t matter what the rules are, if there’s no cop on the corner.
232-7	Spot-checking vehicles and disallowing further public land access to violators (or fines, confiscated, public flogging) as MT FWP does with game-law violators.
245-2	Ignorance of the law has never been an excuse, but it seems to me the answer to most of the problems is education, or lack thereof. I believe this is where the future lies.
248-1	I would urge you to explore ways to keep track of and potentially ticket drivers of ATV’s who trail at high speeds on closed and open roads, as well as those who go cross country, particularly in winter. Their damage to the land is obvious and their damage to the tranquility of this once quiet place is disturbing.
248-3	In defense of some of these offenders, there are no signs posted to prevent this any more, So, I would urge that signage and road blocks needs to be put up.
262-1	Well-marked signs and maps available to the public defining motorized and non-motorized use areas. The majority of visitors will follow the law if they have accurate information.
268-2	Well-marked signs and maps available to the public defining motorized and non-motorized use areas.
268-6	Allocate resources to provide consistent law enforcement and protection of cultural sites, wildlife habitat, and scenic beauty.

Chapter 5: Response to Comments

Subject: Implementation and Enforcement	Response #: IMP-1, Motorized Enforcement Plan
271-1	Unfortunately, any plan that is implemented without proper enforcement is doomed to fail. Only The Forest Service, not the public, can enforce the rules. We see nothing in any of the proposed plans that would lead us to believe that there would be any better enforcement with the new plan that under the existing plan.
280-1	The past ten years have been noticeably different – there are roads everywhere, with no apparent supervision from the responsible agencies for all this off road activity. It’s a shame – the Pryors should be returned to their “prior” beauty – enforce the unauthorized use areas – you should have been doing this long ago. Alternative C is the only choice regrettably.
290-2	I also urge you to add tough penalties rather than a slap on the wrist if someone takes a motorized vehicle where they should not.
291-2	While I am unhappy to see some ATV users driving where they should not it seems like closing the road is a very drastic answer to the problem and punishes more lawful hunters/fisherman than unlawful users. Perhaps more reporting of unlawful use by the public would be an answer. I would certainly be in favor of some type of enforcement over the road closure.
295-1	Enforcement is the key to any successful agenda and I believe that either additional funding for manpower or better yet get a good volunteer program to help assure a good balance for all users regardless of their mode of travel.
307-10	The Beartooth District has only one law enforcement official for the entire District. The fewer roads and classification of routes there are, the easier it will be for the public to understand the rules and for the official to enforce....It is unlikely that additional and adequate funding will happen in the near future, and the Travel Plan should reflect this reality by minimizing the number of routes.
307-11	Road 2140 should be open highway vehicles only (please refer to my comments above concerning unlicensed, uninsured vehicles and under-aged drivers). Consider closing the short spur roads numbered with 2140Bs. They are dead-end routes and will add to the maintenance, signage, and enforcement costs. Legalizing these roads for dispersed camping is a bad idea. Without proper enforcement, users will continue to extend the roads. If camping is needed in the area, the Forest Service should consider construction a formal campground. If funding is an issue, which it probably is, the Forest Service could charge for campsite use to pay for the construction and maintenance. The short spur roads off Road 2414 should be closed for the same reasons given for the 2140 B roads above.
307-14	Likewise, closing Road 21411 is a good decision. It is a dead-end road and keeping it open would add to the Forest Service maintenance and enforcement costs.
314-1	The FS does not have an adequate law enforcement team to keep ORVers from driving off standard routes, not does the agency have the money to harden trails so they don’t create problems. In light of this, the most reasonable response is to ban all thrillcraft.
345-7	Law Enforcement – History in the Pryors absolutely demonstrates that toothless rules invite violation. Therefore, I urge that the agency to: Adopt a policy that states a road is closed unless clearly signed open (notwithstanding the expectation that a master map will rule absolutely after the final Travel Plan is adopted.)
360-4	Your agency lacked the means to enforce your rules back then and by your preferred plan, you are encouraging more damage.
364-1	It seems there are enough roads, but not enough USFS personnel to regulate existing laws.
364-4	...stricter laws should be instituted and then very strictly enforced to manage the out of control drivers.
381-2	My biggest concern is how you plan on supervising whatever plan you decide upon. It will all be for naught if you don’t have some means by which to enforce it. Realizing that you are woefully under funded, I think you need to enlist Pryor Players in this endeavor. I think public awareness of the rules is essential so that they know what’s appropriate and what’s not. Then make them specific to the Pryors with support coming from volunteers and other Pryor users. That means you will need all the players, not just the birders, hikers, hunters, and horsemen. You will need ATV people which you won’t get if you attack them with Plan C.

Subject: Implementation and Enforcement	Response #: IMP-1, Motorized Enforcement Plan
386-9	Note: other general issues, like consistent law enforcement, protecting the resources (cultural sites, wildlife habitat, erosion, noxious weeds, solitude, visual beauty), informing the public, licensing for all vehicles and operators, roads signed as open are the only open roads, the 2001 Tri-state Plan, the 2005 Motorized Rule, costs of roads, all need to be considered and adhered to in implementing a balanced Travel Plan.
387-19	Non-motorized users prefer the multiple use trails as they are the best maintained and provide the best recreational experience. The problem comes when the FS does not properly sign the trails. When a picture of a motorcycle, 4x4, ATV and snowmobile are shown at the trailhead with a circle and red strike through them it portrays to the non-motorized user that this trail is closed to motorized users. Many people do not notice the dates that are associated with the sign showing when the motorized closure applies. The conflict between users is being caused by the agency and its disregard for the need for clear signage. A standardized multiple use sign for these areas must be posted to clearly inform people of the uses allowed in these areas. This corrective action would stop many complaints that the FS receives on user conflicts.
394-6	We are therefore deeply concerned by the Forest’s proposal to authorize unlicensed vehicles in a large area of the Pryors, including most Big Pryor Mountain. Surely this would make enforcement difficult. OHV spokespeople, conservationists, and USFS personnel have all suggested that formal and informal “citizen’s watch” efforts (i.e. report the violators) could significantly help reinforce official enforcement efforts. How can concerned citizens report the license plate number of an unlicensed OHV observed violating motor vehicle use regulations? We see no benefit to the fragile land or to responsible recreationists, either motorized or non-motorized, of allowing unlicensed vehicles on public land.
395-3	We need enforce current use rules and close off all illegally created roads and trails and make fines substantial for abusers.
403-1	We note that Route 24921 has non-motorized status since the 1987 Travel Plan yet ATVs have been sighted using this area. So it seems that enforcement is a key issue here.
403-2	In addition we support the policy of licensing all motorized vehicles using National Forest land so that it will be easier for violators of non-motorized trails to be reported to the proper authorities. We also support the policy of using stiff fines and the confiscation of vehicle for violators going onto non-motorized trails. Stricker (sic) enforcement of the travel plan must be a top priority by using new and more effective methods to discourage.
404-3	Something I have noticed in my three years going to the Pryors is how badly road 2308 is torn up between the Crooked Creek Road junction and the wild horse range boundary, especially between Big Ice Cave and the wild horse range boundary. From my observations, people get past the long-lasting snow banks and muddy conditions of the road by going around them. The road has thus become rough and wide. A seasonal closure may help alleviate this, but I am not so sure that it would keep everyone off the road unless there was thorough enforcement of the closures.
404-4	Near Dryhead Vista is a road that turns south from road 2308 and allows access to the Lost Water Canyon and Tony Island areas....I’m very much in favor of keeping the road closed, but I am frustrated that this closure is not posted.
404-7	While many visitors to the Pryors would act responsibly provided proper information, there are others that will do as they want unless given proper reason not to. Thus, proper enforcement is huge. I am unsure of how this plan can be enforced considering current financial situations of certain federal agencies like the Forest Service. It really is necessary though, and so anything you can do to have a presence in the Pryors would really help.
404-9	The creation of a new travel map will also be very beneficial as current maps are insufficient for describing all road closures and openings. When your travel map is available, I would also encourage the widespread distribution of it both in paper form and on your website. I can assure you the Pryor Mountain Wild Mustang Center would be happy to help you distribute them to visitors planning trips to the Pryors.

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Subject: Implementation and Enforcement	Response #: IMP-1, Motorized Enforcement Plan
411-41	There is many clubs, organizations, and individuals with a stake in the future of our public lands. It is important to utilize these volunteers in maintaining these lands. With a little education, and the willingness of agencies to work with them, volunteers can make a difference in the management of the lands. Users can easily monitor trails and roads and report on their conditions. Many of the people of these organizations that do real on the groundwork are the people that are being restricted from many historical used areas.
414-7	Past absence of on the ground presence and enforcement is responsible for much resource abuse and damage, especially in the Pryors Unit. The welcome change from routes “Signed Closed” to routes “Designated Open” is a major step forward toward simplifying enforcement. However, signs, regulations, and travel maps cannot protect the resource alone. I urge you to find a way to put some real teeth in your enforcement efforts.
417-6	Past absence of staff on the ground presence and enforcement is responsible for much resource abuse and damage, especially in the Pryors Unit. The welcome change from routes Signed Closed” to routes “Designated Open” is a major step forward toward simplifying enforcement. However, signs regulations, and travel maps cannot protect the resource alone. We urge you to find a way to put some real teeth in your enforcement efforts.
421-5	Hiking trails should be well maintained and marked in order to allow for the best possible use of these areas. Designations should be made identifying areas in three categories: easiest, more difficult, and most difficult. Appropriate areas should be established with parking and staging areas... Trails for OHVs should be color coded so that users understand the difficulty of the trail they are embarking on. Standardization such as easiest, more difficult, and most difficult should be noted.
421-10	There are many clubs, organizations, and individuals with a stake in the future of our public lands. It is important to utilize these volunteers in maintaining these lands... Expanding programs like “Adopt a Trail” and ensuring that groups are working with agencies to provide proper trails will benefit all users and the forest. The creation of programs like “Stay on the Trail or Stay Home” signage will ensure longevity of user enjoyment.
425-14	The more complex road system and greater number of motorized routes in Alternative B will require more funding and staff time for enforcement. If the enforcement level is the same in Alternative B (as claimed in Table 3-76 page 3-197) then enforcement in Alternative B will be spread thinner and be less affective. Ineffective enforcement will lead to more resource damage which will require even more funding and staff time correct.
461-25	We commend you for your decisions to close road #20952 to public access and loop routes #2308B and 2308B1 to motorized use in Alternative B. However, we are concerned that there is no discussion in the environmental consequences section on p. 3-50 of how these areas will be closed and how closures will be enforced. No mitigation or enforcement plan has been disclosed, and without such plans it is highly unlikely that public motorized use will stop of its own volition.
440-2	I forest preferred alternative would involved increased road maintenance and additional law enforcement, the costs of which may not even be a possibility given the current lack of funding for adequate law enforcement. How will funding match the expansive plans of the preferred alternative? Can better enforcement be guaranteed with this alternative?
445-1	I remain concerned about maintenance and enforcement issues. It makes no sense to have a detailed travel plan if it can’t be implemented and can’t be enforced. If the final EIS calls for road closures who are you going to put them with only on full time, and several part-time law enforcement officer?
461-72	Even the most resource protective travel plan is only as good as the capacity to enforce restrictions. We would like to see an alternative based on the current enforcement capacity on the Custer NF.

Subject: Implementation and Enforcement		Response #: IMP-1, Motorized Enforcement Plan
461-73	We have a particular concern with the conclusion for Alt. C. The DEIS states, “This alternative does not include the designation of motorized trails within the Pryor Unit. As a result, the District will not be able to apply for State of Montana Recreation Trail Program grant funding for activities such as providing additional FPOs and coordinating/supporting volunteer patrol programs on the Pryor Unit, where there is a key need for this support. The Beartooth Unit would continue to be eligible for these Programs,” (DEIS p. 3-196). This seems to erroneously suggest that the Alternative B would be more enforceable, when in fact this is not the case. Those routes that are closed would not need the same level of enforcement as those designated open, therefore the costs would be less for Alternative C.	
461-74	Unfortunately, the DEIS did not adequately analyze implementation of the alternatives as there is no mention of the needed closure devices or a description of how these devices will be maintained. Enforcement and monitoring plans should be in place for each motorized route.	
483-6	We note that consistent law enforcement is the solution to preventing some of the resource damage and expansion of unauthorized roads seen over the past 20 years in the Beartooth District. Consistent signage, appropriate maps, licensing of all vehicles, and real enforcement are all critical.	
Summary of Comments: How will the project be implemented and enforced relative to motorized use?		
Response: Through the implementation of this travel plan decision, a clear system of designated roads and trails for motorized use will be employed. The 2005 Motorized Travel Rule clarified regulations under which we will implement this decision, and will make enforcement of illegal cross country travel much easier in the future. With a motor vehicle use map and standard route signs, along with an aggressive information and education campaign, users will have a better understanding of the designated routes available for use.		
All users, including enforcement officials, will be able to have a clearer understanding of the designated routes available for use. Violations of 36 CFR 261.13 are subject to a fine of up to \$5,000 or imprisonment for up to 6 months or both (U.S.C. 3571(e)). This prohibition applies regardless of the presence or absence of signs.		
Although there is no additional funding for implementation of this decision, it is one of the Forest Service’s national priorities set by the Chief. Partnership dollars, grants and volunteer work will likely play a significant role in implementing the selected alternative.		

Subject: Implementation and Enforcement		Response #: IMP-2, Enforcement
Letter-Comment #: 152-3	Of course, all the controls on travel, whatever they may be, are worthless unless there is adequate law enforcement.	
222-1	Without adequate enforcement all the good ideas and travel management plans mean nothing.	
222-5	And you should not allow them if you do not have the resources to police and enforce your own laws.	
360-3	There is no enforcement of speed of safety requirements and these machines are very powerful. Nor are they licensed.	
386-13	Any Travel Plan is again useless without enforcement, as we see with the 1987 TP.	
508-2	Plan also needs to identify the costs/staffing needs for enforcement. What can't be enforced must be closed to motorized use.	
Summary of Comments: Question the ability to enforce the project.		
Response: Enforcement of regulations is part of everyday operations on National Forests. Suggesting that if the Forest Service is unable to enforce every motorized violation we should manage the entire Forest as non-motorized is not a reasonable alternative to consider. There will be enforcement and education of the final decision to help users understand and comply with it.		

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Subject: Implementation and Enforcement		Response #: IMP-3, Non-motorized Enforcement Plan
<u>Letter-Comment #:</u> 406-2	Past absence of on the ground presence and enforcement is what I blame for most forest abuse and damage... As an example of desk management, day use on Lake Fork, Crow Lake trail and Dry Head overlook restrictions; I see this approach as a Band-Aid for the forest's failure to provide on site presence with ENFORCEMENT! .What the forest needs is an "iron fist" enforcement and prosecution policy to return it to balance.	
411-2	There has been a stock camping restriction on the Lake fork drainage since 1981 up to 1/4 mile above September Morn lake and it has not been enforced.	
411-17	Crow Lake trail #13B. 8. Does the CNF have a plan for an area to tie stock for extended time periods at the junction of the Crow Lake. 9. The CNF would be better served if the Beartooth Backcountry Horseman were contacted to come up with a better solution to have a point specific tie up area established more than 200 feet from the lake and 100 feet from a stream. In an area that is signed, least visually obtrusive. With a natural looking hitching post or highline. With ground that naturally resistant to erosion, or a rocky area improved to let stock stand comfortably with natural drainage. 10. An action as mentioned above would quite possibly be done with local BCH help. And would most likely only need Categorical Exclusion to get this work done.	
411-21	Lake Mary. Better CNF signage and public info. To demonstrate there are poor camping opportunities at Lake Mary and that camping in the Quinnebaugh meadows provides the best stock camping opportunities in the West Fork of Rock Creek Drainage.	
421-5	Hiking trails should be well maintained and marked in order to allow for the best possible use of these areas. Designations should be made identifying areas in three categories: easiest, more difficult, and most difficult. Appropriate areas should be established with parking and staging areas... Trails for OHVs should be color coded so that users understand the difficulty of the trail they are embarking on. Standardization such as easiest, more difficult, and most difficult should be noted.	
<u>Summary of Comments:</u> How will the project be implemented and enforced relative to non-motorized use?		
<p><u>Response:</u> Travel management is one of the chief’s priorities. Information at trailhead portals, partnerships, grants, and volunteers will likely play a significant role in implementing the travel management decision. Actions such as those outlined above are listed in the opportunities list found in Appendix E.</p> <p>There is a management plan for the AB Wilderness which provides direction regarding signing and stock use. Permanent hitching posts or specific tie up areas are not compatible with Wilderness values. However, there is an opportunity to work with Back Country Horsemen or other individuals and groups to improve management of the Wilderness.</p> <p>All system trails are classified relative to use and maintenance objectives. Policy directs that minimal signing be done, and is especially discouraged in Wilderness. However, trail difficulty or suitable stock camping areas could be posted at trailhead portals could be considered as an opportunity. These ideas are listed in Appendix E as opportunities to consider in the future.</p>		

Subject: Implementation and Enforcement		Response #: IMP-4, Vehicle License Requirements
<u>Letter-Comment #:</u> 248-2	I would think that you should require that any ATV in the Pryors be licensed. I would suggest having some kind of registration at the bottom of the mountains on Sage Creek and Crooked Creek Roads, as well as Burnt Timber and Sykes Ridge Roads (in cooperation with the BLM). As just ordinary people on the Pryors, we have no method to report an offender who is traveling off road or on theoretically closed roads. Usually we just see the color of the ATV's and the number of people in the group. At least a visible license could be noted if we can get close enough. I don't know whether this is in the mix for consideration but I think it needs to be discussed.	
307-5	Allowing unlicensed vehicles would complicate enforcement. The license plate or tag is the only way to identify vehicles and owners.	

Subject: Implementation and Enforcement		Response #: IMP-4, Vehicle License Requirements
394-6	We are therefore deeply concerned by the Forest’s proposal to authorize unlicensed vehicles in a large area of the Pryors, including most Big Pryor Mountain. Surely this would make enforcement difficult. OHV spokespeople, conservationists, and USFS personnel have all suggested that formal and informal “citizen’s watch” efforts (i.e. report the violators) could significantly help reinforce official enforcement efforts. How can concerned citizens report the license plate number of an unlicensed OHV observed violating motor vehicle use regulations? We see no benefit to the fragile land or to responsible recreationists, either motorized or non-motorized, of allowing unlicensed vehicles on public land.	
418-6	A License and Registration requirement for vehicles and drivers using the Forest is critical. When enforcement is such a problem it is ridiculous to allow unlicensed vehicles and drivers to use NFS lands. How can violators be reported?	
Response: The Forest Service, by policy, defers to state motor vehicle licensing requirements. In Montana, motor vehicles are required to be licensed to be operated on National Forest System roads. Licenses are not required for motor vehicles to operate on National Forest System trails. All OHVs belonging to residents of the State of Montana are required to be registered and display an OHV sticker that has a unique identifier number. In addition, trailers that haul unlicensed OHVs must be licensed. There are many types of information that can be used to report a violation including: date, location, time, vehicle/trailer information (license plate, OHV sticker, make, model, and color), and operator information.		

MAINTENANCE

Subject: Maintenance		Response #: MTCE-1, Budget
Letter-Comment #: 40-3	Adequate budgets need to be provided to maintain the roads remaining on the road system within the analysis area. We believe the preferred alternative should include a greater commitment of resources to road maintenance to reduce risks to water quality and fisheries. We encourage the Forest Service to incorporate as much road rehabilitation and road closure and decommissioning as possible in its preferred alternative, particularly removal of road stream crossing, and obliteration of road causing resource damages.	
40-4	We also do not support the addition of new routes to the road system (e.g. #21407, #241412, #21401A, #21401B), especially routes with high risk of erosion and water quality impacts, when funding for road maintenance is already inadequate to address resource impacts from existing roads and nearby campsites. New routes and increased demands for road maintenance should not be placed on the system when road maintenance is already inadequate and overburdened. The EPA believes road and trail networks should be limited to those that can be adequately maintained within agency budgets and capabilities, and roads which cannot be properly maintained should be decommissioned.	
40-8	It is not clear, therefore, how many roads are currently on the District to compare the 28 miles of annual road maintenance to, but it appears that only approximately 8-13% of the roads on the District to receive annual maintenance.	
40-9	We believe that there should be a continuing road inspection, evaluation and maintenance program in place to identify road drainage and BMP needs, including an inspection, evaluation and road maintenance program, and adequate funds to correct road deficiencies.	
40-13	The also DEIS states on page 3-93 in regard to adding routes #21407 and #241412 that "it is unknown when maintenance would occur," and that impacts from dispersed campsites near roads will, "continue into the foreseeable until site maintenance occurs, although it is unknown when maintenance would occur," and that "maintenance will be insufficient to address the problems" on routes #21401A and #21401B (page 3-94). These statements only reinforce EPA concerns about the inadequacy of Forest Service road maintenance budgets.	
40-26	We recommend that the preferred alternative include modifications to reduce roads in high hazard areas; avoid adding new roads that overburden the already inadequate road maintenance budget; and include a greater commitment of resources to road maintenance and road decommissioning to reduce risks to water quality and fisheries.	

Chapter 5: Response to Comments

Subject: Maintenance	Response #: MTCE-1, Budget
41-8	Economically, Alternative B is clearly not the best choice for an under budgeted and overextended office. According to Table 3-79 on page 3-200, the estimated yearly maintenance cost for Alternative B is \$96,000 greater than for Alternative C. It doesn't seem wise to create more motorized routes than funding is available to maintain.
42-1	I favor a plan that limits vehicular traffic to roadways that are maintained. And, if those roads do not have an improved surface, no off road vehicles should be allowed on them if they are wet inasmuch as deep ruts are developed very quickly by the ATVs.
124-22	The plan makes no funding commitment towards maintaining roads and trails. Considering that little has been spent in the past on upgrading existing roads and trails, it is puzzling the Forest Service would choose Alternative B that would add still more road miles to be maintained.
129-31	It doesn't seem prudent to create more motorized routes than funding is available to maintain. So Alternative C seems both less expensive and wiser. But the estimated maintenance cost is only part of the cost difference between Alternatives B and The Pryors Coalition 19 C. For example: Five times as many acres in Alternative B are highly susceptible to noxious weed infestation than in Alternative C. (See Vegetation section.) This will require more funding and staff time for weed monitoring and treatment. If the needed weed control staff and funding are not available then it is likely that noxious weeds will infest significant areas of the Pryors.
161-1	With the prospect of receiving low levels of funding now and in the future, you should be recommending closure of all the non-system "User created" routes and sufficient System Roads to fit within the anticipated funding.
161-7	Rewrite the discussion on Issue #3, "Economics", bringing into the discussion the planned costs to manage, maintain and, if necessary reconstruct the System. Deferred maintenance has a cost. This is mostly the cost of reconstruction rather than simple or heavy maintenance. It should be recognized somehow.
161-8	Add no new roads or motorized trails to the System until the Agency has demonstrated that the entire System can be managed and maintained to current Agency Standards.
307-21	Road maintenance Forest-wide has suffered due to inadequate funding. This situation is not likely to change in the near future. The Forest Service must consider this reality, and should consider closing or not authorizing roads that cannot adequately be maintained.
307-22	The Forest Service needs to consider the number of roads it can realistically maintain and close the rest.
386-12	The CNF has not been able to maintain legal roads in the Pryors due to lack of budget, and has no plans to increase that budget, so that alone is reason to not add system roads.
406-9	Our past record of road maintenance is dismal - if CNF can't afford to maintain, then it must decommission - be realistic. Why don't we talk about the real and true long term coast of deferred, maintenance and decommissioning; because I think, the figures would be nauseating.
425-12	It is to be questioned whether funds for road maintenance may or may not be available. If they are not available, it doesn't seem wise to create more motorized routes than funding is available to maintain them. Therefore we believe that Alternative C would be the prudent approach to one of the most serious potential problems for this Travel Plan. In our view, certain roads and motorized trail/miles must be reduced in order to properly provide adequate maintenance of accepted roads.
435-4	Some money needs to be spent on wet and also rocky sections of roads by filling in and building up wet sections with rock and gravel and covering rocky sections with gravel.
482-1	More effort and time should be spent on road maintenance and upkeep. A lot of the roads in the Pryor Mtns as well as the roads and trails in the Stillwater area have not had any maintenance for the last 10 years.
Summary of Comments: There is question on the ability to maintain all the roads and trails being designated.	
Response: Funding for maintenance of roads and trails is not anticipated to change significantly in the next 10 years. Based on past funding levels, the Forest is unlikely to have sufficient funding to maintain to standard all of the routes necessary for the administration, utilization, and protection of the District for the foreseeable future. As a result, the Forest prioritizes maintenance work and routinely applies for additional/supplemental funding to increase the number of miles of road and trail maintenance completed. If issues arise, road closures will be considered to protect resources and/or user safety.	
Partnerships, grants and volunteer work could play a significant role in maintaining the forests roads and trails.	

Subject: Maintenance		Response #: MTCE-2, Gas Tax
Letter-Comment #: 66-91	We request that maintenance actions be taken before closure actions. We believe that this is a viable alternative that would address many of the issues that are driving the pre-determined decision to closure. OHV recreation generates significant gas tax revenue that could be tapped for this purpose.	
Response: The state gas tax is not directly available to the Forest Service. The State does provide grants for OHV trails which are funded partly from state gas tax. The Forest Service must compete for these grants.		

Subject: Maintenance		Response #: MTCE-3, Cost Tables
Letter-Comment #: 155-9	What is not shown in these tables are costs associated with signage, trail maintenance and all other costs for areas that are only accessible to non-motorized users.	
Response: Table 3-79 in the DEIS was intended to provide readers with a comparison of maintenance costs associated with motorized use. The majority of the actions are related to motorized use have a substantive difference that could be displayed. Non-motorized actions were minor with no substantive difference in maintenance costs.		

Subject: Maintenance		Response #: MTCE-4, Motorized Route Maintenance
Letter-Comment #: 40-11	We believe efforts to improve road conditions and reduce sediment delivery from roads and decommission unneeded roads should be an important element of the Travel Plan. One of our main concerns with travel planning is that the poor conditions of existing roads and trails are often not adequately addressed during the process.	
66-78	National Forest officials have stated that all challenging motorized roads and trails would be eliminated due to their concerns about hazards on those routes. For many of us, these are the very routes that we consider to have the greatest recreational value....We request that this unreasonable and discriminatory criterion be dropped immediately from the process and that the process be restarted without this criterion.	
385-4	This summer I went for a hike out of the Meyers Creek Work Center. Signs said that vehicles were not allowed on Trail27. This turned out to not be true. Five motorcycles passed us on the trail as we were going up a fairly steep portion of the trail along the South Fork of Meyers Creek. This was early July. There was water running down the trail. The bikes dug up the trail and increased the erosion. There were water and rocks tumbling down the trail. This trail should not have been opened to ORV use until this portion of the trail was improved to handle that kind of use.	
386-19	Road #2097 (Beaverslide) is too steep and dangerous to be a system road.	
461-4	Therefore, the designation of any non-system route as a motorized trail should also include an assessment of current compliance with trail construction standards and how any areas of non-compliance will be addressed.	
461-70	We note that the Forest Service currently has no trail design parameters for vehicles larger than ATVs, which would seem to indicate a belief within the agency that pickups, jeeps, and other vehicles larger than 50 inches wide belong on roads, not motorized trails. Given this legal ambiguity, we urge that any routes allowing vehicles greater than 50" be designated and managed as Maintenance Level 2 roads.	
Summary of Comments: Some are concerned that roads and trails need to be improved to meet standards prior to designation. Others question the type of standards needed for roads and trails to be designated.		
Response: There are no specific "standards" for motorized trail construction, and existing Forest Service guidance related to motorized trail construction is general. More specific guidance is currently being developed.		
We have reviewed all of the non-system routes that are proposed to be converted to motorized system trails to identify if natural and cultural resource issues exist. No issues were identified with these specific routes.		
All routes including challenging routes, have a maintenance class assigned to them and are maintained at different levels and rates depending on the priority and available resources.		
Alternative B Modified season of use, minimized impacts during spring thaw, including Meyers Trail #27 and Beaverslide #2097.		

Chapter 5: Response to Comments

Subject: Maintenance	Response #: MTCE-4, Motorized Route Maintenance
<p>The range of alternatives outlines a mix of roads versus motorized trails that includes vehicles over 50". The only motorized trails for vehicles over 50" occur on Big Pryor Mountain.</p> <p>No specific human hazards were identified with any routes being considered in this process. In addition, the Forest Service did not use the "degree of challenge" related to hazards as a criterion for determining whether or not to designate a route.</p> <p>Effects have been evaluated for all of the alternatives.</p>	

Subject: Management	Response #: MTCE-5, Road Density
Letter-Comment #: 461-82	One of our concerns stems from the fact that once a road is reclassified as a trail, it is no longer considered in road density analyses and it no longer receives the same maintenance.
<p>Response: Depending on the analysis being done density calculations can be based on a number of factors. If motorized access is the concern, all motorized routes, regardless of road or trail, have been included in the density calculations.</p> <p>All routes have a maintenance class assigned to them and are maintained at different levels depending on the resource need.</p>	

MANAGEMENT

Subject: Management	Response #: MGMT-1, Zoning
Letter-Comment #: 124-10	Resource-rich areas of the Pryors need to be identified (is zoning the right word?) and rules laid down as to what uses would be allowed or disallowed in each.
129-2	A second general concern with the Travel Planning process is that it apparently was not based on any long range vision for the desired future condition of the Pryor Mountains. This is indicated by the following quotation from the DEIS: "Zoning areas by type of use or similar management prescription is more appropriate for land management planning. This analysis is largely focused on the designation and use of routes (roads and trails), rather than prescriptive land use direction that would require amending current Forest Plan land use direction which is beyond the scope of this analysis." (DEIS page 2-10) We find the Forest's argument that they are attempting to do travel planning without doing management planning completely inadequate and unconvincing. Travel Planning IS management planning. Very few management decisions have more impact on land use direction than travel planning. The designation of roads preempts future management planning. The Travel Plan is doing management planning by default. For example, designating routes #2088 and #2144 in the Preferred Alternative will preclude the designation of two valuable non-motorized zones in future management planning. At a minimum, the possibility of achieving and maintaining the desired future condition must be preserved. The best, and easiest, way to create a Travel Plan is to start with a vision of what the Pryors should look like several decades into the future. Why are the Pryors important? How can that be preserved? What will be the value of the Pryors to people in the region in the future? A broad range of resources need to be protected, and a broad range of recreational interests need to be accommodated while minimizing conflict among them and limiting impact on the resources. People want motorized access, and people want to be able to get away from roads. It seems obvious that to protect ecosystems and individual species the first thing to do would be to define zones for that purpose.
129-24	As long as both motorized and non-motorized recreation are allowed in the Pryors there will be conflicts among users. However basing the Travel Plan on a zoning plan could reduce these conflicts. Unfortunately the Forest rejected this approach
219-2	Why has the Forest Service ignored the work of the Montana Wilderness Association, Audubon Society, Back Country Horsemen, and others? These groups spend five years to devise a substitute "vision" for the Pryor Mountains. Their vision provides a more-than-generous 75 miles of roads, routes around five non-motorized zones that offer both protection of the area's resources (including wildlife) and quiet recreation.

Subject: Management		Response #: MGMT-1, Zoning
279-1	I recommend that as much as possible, there be separate designed areas for motorized use and hiking-horseback riding use.	
288-2	As long as both motorized and non-motorized recreation are allowed in the Pryors, there will be conflict among users. These conflicts could be reduced, however, by basing the Travel Plan on a zoning plan.	
288-3	These conflicts could be reduced, however, by basing the travel plan on a zoning plan. Multiple use does not mean all uses on all acres, thus we urge the FS to consider the adoption of a plan that sets aside quiet non-motorized areas from motorized areas, even mountain bike areas from horse areas should be considered.	
467-17	By rejecting landscape area zoning, and by rejecting designation of non-motorized areas as called for in Executive Order 11644 (Section 3) the Forest Service gives the Pryors short shrift...The DEIS thus seems to contradict itself in terms of the Forest Service's willingness and ability to amend the Forest Plan. Moreover, much of what we are recommending is expressly authorized by the Forest Plan (see Appendix A).	
Summary of Comments: Travel Planning should zone uses.		
<p>Response: The Custer National Forest and National Grasslands Land and Resource Management Plan was developed through the long-term resource management planning efforts required by the National Forest Management Act, as amended. This very public process set the goals, objectives, forest-wide and management area standards for the Forest and provides the basis for management of the Forest's resources. Site-specific efforts such as travel management planning address a component of Forest management, but are not intended to be the more comprehensive planning effort associated with Forest-level land management planning. Site-specific efforts like travel management planning must be consistent with the Forest Plan.</p> <p>Forest Plan Management Areas in the analysis area, the Beartooth Ranger District, are B, C, D, E, F, G, H, I, L, M, P, Q, R, and T. Of these, Management Areas H (recommended wilderness), I (Wilderness), and L (Research Natural Areas) generally prohibit motorized use in them.</p>		

Subject: Management		Response #: MGMT-2, Cave Management
Letter-Comment #: 406-6	Again the Forest Plan calls for special attention and evaluation of cave and sinkhole sights for adverse effects of surface activity. Has this study been completed, with satisfactory answers, concerning this proliferation of roads?	
<p>Response: The direction provided in the Forest Plan related to cave resource protection has been considered. An evaluation of the potential for the proposed action to affect cave resources was conducted and is in the project record. The evaluation keyed on the direction related to "ground disturbing activities" and "management practices" (proposed actions) with the potential to introduce additional sediment into caves. There are no ground disturbing activities associated with the project. The Pryor Unit cave inventory was used to evaluate the proximity of proposed system road additions to cave resource and determine the potential for impacts. The evaluation determined that there was a low probability for Alternative A to have effects, and did not identify any potential for the proposed actions associated with Alternatives B, C, and B Modified to have adverse impacts to cave resources.</p>		

Subject: Management		Response #: MGMT-3, Roadless Areas
Letter-Comment #: 40-22	We encourage the Custer NF to restrict motorized use in remaining roadless areas to protect the pristine characteristics of such areas. We support closure of motorized routes created by cross-country travel in such areas, with closures policed and enforced. We support the features of Alternative C that would result in the fewest open road miles within roadless areas.	
314-2	At the same time, the FS should protect all roadless areas and manage as wilderness until Congress has acted upon it one way or another.	
<p>Response: To clarify, since at least 1987 no cross country travel (no off-road vehicle travel) has been approved on the Forest, except in the Benbow/Picket Pin area per the 1987 Beartooth Travel Plan. That use is consistent with the 1987 Forest Plan which prohibited cross country travel as noted on page 13, in Forest-wide standard 2. Recreation c. Off-Road Vehicle Use "...restrictions will provide reasonable access for public recreation, hunting and range maintenance/administration, but will confine motorized vehicles to specific roads, trails, or areas identified on a map. Vehicular access off these designated locations will be prohibited." The 2001 Tri-State Off-Highway Vehicle Decision reaffirmed the Forest Plan standard and the off-road use in the Benbow/Picket Pin areas was curtailed. Dispersed camping, parking and use have been allowed and are consistent with Forest Plan direction as well as the 2001 Tri-State</p>		

Chapter 5: Response to Comments

Subject: Management	Response #: MGMT-3, Roadless Areas
Off-Highway Vehicle Decision. The 2001 Roadless Area Conservation Rule currently provides guidance for travel management in roadless areas as noted in Chapter 1, Roadless Rule of the FEIS.	

Subject: Management	Response #: MGMT-4, Purpose and Need
Letter-Comment #: 66-64	In summary, the proposed alternative is built upon a tenuous foundation which assumes that: (1) various statutes require that ecological sustainability be the dominant consideration for all management of National forests; (2) sustained yield of various goods and services derived from the forests cannot be achieved without first achieving ecological sustainability; and (3) that ecological sustainability in all cases is the highest and best use of the forests for the American people. To be supportable, these assumptions would require significant legal, scientific, and economic data. As it is, such data has not been provided and these assumptions are false, therefore, the proposed alternative is flawed and should not be adopted.
Response: See the Purpose and Need for the proposal, as well as the Scope of the Decisions to be Made in Chapter 1 of the FEIS. Pursuant to the 2001 Tri-State Off-Highway Vehicle Decision, the Forest had identified travel management on the Beartooth Ranger District as a high priority and had started efforts to comply with that decision. The Forest had to assess the on-going effort in consideration of the 2005 Motorized Travel Rule. The Department of Agriculture issued the 2005 Motorized Travel Rule to be consistent with Executive Orders 11644 and 11989, and to serve as the means to implement the policy direction contained in these Executive Orders, as well as comply with myriad other laws, regulations, and policies applicable to National Forest System lands. The 2005 Motorized Travel Rule places more emphasis on considering the effects of motorized trails and areas, than of roads. Consistent with the 2005 Motorized Travel Rule, development of the Preferred Alternative, specifically included considering effects of trails with the objective of minimizing effects related to damage to soil, watershed, vegetation, other forest resources, harassment of wildlife, disruption of wildlife habitats, and conflicts between motorized trail use and existing uses. The other alternatives that have been developed to reflect the scope and range of uses, users, and input provided by the public. The development of the Proposed Action, other reasonable alternatives to the Proposed Action and the effects analysis are consistent with the regulations implementing the National Environmental Policy Act at 40 CFR 1500-1508, but in particular at 40 CFR 1501.7, 1502.16, and 1508.14	

Subject: Management	Response #: MGMT-5, Scope
Letter-Comment #: 66-65	Mountain States Legal Foundation, which has made numerous appearances before the U.S. Supreme Court and federal courts of appeals, filed comments with the Colorado Roadless Areas Review Task Force and has advised “The U.S. Forest Service may not manage federal land as wilderness unless Congress has designated that land as wilderness”. This legal opinion must be considered adequately and made part of this proposed project.
Response: See the Purpose and Need for the proposal in Chapter 1 of the FEIS, as well as the Scope of the Decisions to be Made. Specifically, the decision to be made is to designate a system of roads and trails on the District for public motorized use. The type of vehicle and season of use would also be designated for each system road and motorized trail. The Responsible Official will not be making a decision to recommend any areas for wilderness designation. Areas that have been recommended for wilderness classification have been allocated as Management Area H in the Forest Plan.	

Subject: Management	Response #: MGMT-6, Baseline
Letter-Comment #: 66-74	We request that the process be restarted and that all existing roads and trails which are available for use by motorized recreationists be adequately identified as the baseline alternative.
Response: An exhaustive public involvement effort to identify significant issues and alternatives has been on-going since at least 2004 (see Chapter 2 of the FEIS). Alternative A, described in Chapter 2 of the FEIS, is generally described as the existing condition and would designate public motorized use on a majority of routes (system and non-system) that were identified during the 1999-2000 inventory. However, Alternative A is not considered the baseline for analysis. Rather the No Action Alternative, described in Chapter 2 of the FEIS, is the baseline for analysis. This is because designation of the existing network of system roads would not require further NEPA analysis and represents the starting point for any proposed changes to the routes or areas available for public motorized use.	

Subject: Management		Response #: MGMT-7, 2001 Tri-State Off-Highway Vehicle Decision
Letter-Comment #: 66-122	We request a clarification in the document that travelways with these origins are legal travelways as recognized by all policies and decisions including the 3-States OHV ROD, national OHV and route designation policy, and BLM OHV policies.	
Response: The Record of Decision for the 2001 Tri-State Off-Highway Vehicle Decision amended forest plans to prohibit motorized wheeled cross-country travel to protect natural resource values (see Purpose in the Purpose and Need section). The 2001 Tri-State decision did not change the current year-long or closed designation of areas, nor did it change current road or trail designations. It did set timeframes in which site specific travel management NEPA analyses efforts should occur for National Forests and Grasslands affected by the decision that did not have site specific travel plans.		

Subject: Management		Response #: MGMT-8, FS-643 Roads Analysis
Letter-Comment #: 66-126	We request that FS-643 be used in this evaluation to determine the specific values of each motorized road and trail.	
66-127	We request full use of the FS-643 Roads Analysis Manual in order to adequately account for the social, economic, cultural, and traditional values that motorized roads and trails provide to the public. FS-643 should be used on every road and trail segment in order to adequately identify and evaluate the needs of motorized visitors and in order to avoid contributing to additional cumulative negative impacts to motorized visitors.	
Response: Route by route evaluation was completed in the analysis and is consistent with the 2005 Travel Rule. The 2005 Travel rule is consistent with FS-643. Please see FEIS Appendix C, project record, and rationale for each route.		

Subject: Management		Response #: MGMT-9, Exemptions
Letter-Comment #: 66-153	We request that the process include consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management. The analysis should include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure.	
66-162	Agencies should not use motorized access in areas closed to motorized access by the public because: (a) the public will see the tracks and could become upset that the motorized closure is being violated and/or (b) the public will see the tracks and conclude that motorized access is acceptable.	
350-2	In the last ten years Montana has lost considerable land to forest fires. By abandoning roads and trails into the forest interior, we will detrimentally limit our state's ability to protect our forests. In a shortsighted effort to limit the cost of road maintenance, we will put our forests in jeopardy.	
Response: The regulations per 36 CFR 212.51 exempt some vehicles and uses from the designations of the Travel Rule. These are: (1) Aircraft; (2) Watercraft; (3) Over-snow vehicles (see §212.81); (4) Limited administrative use by the Forest Service; (5) Use of any fire, military, emergency, or law enforcement vehicle for emergency purposes; (6) Authorized use of any combat or combat support vehicle for national defense purposes; (7) Law enforcement response to violations of law, including pursuit; and (8) Motor vehicle use that is specifically authorized under a written authorization issued under Federal law or regulation.		

Subject: Management		Response #: MGMT-10, Best Available Data
Letter-Comment #: 68-7	The Forest Service is remiss in not collecting precipitation data for the Pryors which is needed not only for management of the road system, but for proper management of the subalpine horse range and grazing allotments.	
Response: Precipitation and Flow Regimes presented in the FEIS in the Water Quality Affected Environment section are based on best available information.		

Chapter 5: Response to Comments

Subject: Management		Response #: MGMT-11, Wilderness Study Areas
Letter-Comment #: 106-5	We urge you to keep ORVs strictly out of Wilderness study areas.	
<p>Response: There are no Wilderness Study Areas on the Custer National Forest. Forest Plan Management Area H contains the lands recommended for wilderness classification. Areas recommended for wilderness are in Lost Water Canyon in the Pryor Mountains and other smaller areas that lie adjacent to the Absaroka-Beartooth Wilderness. None of the action alternatives propose to designate motorized routes in recommended wilderness areas. See Forest Plan pages 67 through 68 and the Forest Plan Management Area Map for the Beartooth Ranger District for management area direction, and locations of these areas on the Forest respectively. Existing system routes within Management Area H are proposed to be designated in Alternative A and the No Action Alternative; designation of routes in Management Area H is avoided in all other alternatives.</p>		

Subject: Management		Response #: MGMT-12, Forest Plan
Letter-Comment #: 163-1	There does not appear to be big picture/desired future condition/best management practices consideration of the landscape and resources to guide development of the Travel Plan. By creating a travel plan without an overview, you are, de facto, allocating one-sided management designation of motorized recreation for the Pryors.	
<p>Response: The Custer National Forest and National Grasslands Land and Resource Management Plan was developed through the long-term resource management planning efforts required by the National Forest Management Act, as amended. This very public process set the goals, objectives, forest-wide and management area standards for the Forest and provides the basis for management of the Forest's resources. Site-specific efforts such as travel management planning address a component of Forest management, but are not intended to be the more comprehensive planning effort associated with Forest-level land management planning. Site-specific efforts like travel management planning must be consistent with the Forest Plan.</p>		

Subject: Management		Response #: MGMT-13, Wilderness Plan
Letter-Comment #: 411-9	Does the CNF have a wilderness management plan that has been used in the past, present, or being developed for the future to address overnight stock camping in these areas.	
<p>Response: Yes. The A-B Wilderness Plan is in effect. Forest Plan Appendix II is intended to highlight the specific management direction developed in the Absaroka-Beartooth Wilderness Management Plan, a document prepared jointly by the Gallatin and Custer National Forests. Copies of this document are available at the Supervisor's Offices of the Gallatin and Custer National Forests.</p>		

Subject: Management		Response #: MGMT-14, 36 CFR 261
Letter-Comment #: 461-77	To comply with the TMR, a Forest must address and implement the Rule as a unitary whole; both subparts A and B must be implemented simultaneously.	
<p>Response: The 36 CFR 261 Subpart A General Prohibitions states that, "After National Forest System roads, National Forest System trails, and areas on National Forest System lands have been designated pursuant to 36 CFR 212.51 on an administrative unit or a Ranger District of the National Forest System, and these designations have been identified on a motor vehicle use map, it is prohibited to possess or operate a motor vehicle on National Forest System lands in that administrative unit or Ranger District other than in accordance with those designations." There is no requirement in the 2005 Motorized Travel Rule to simultaneously execute a Forest Order under 36 CFR 261 Subpart B in order to implement the prohibitions created by issuance of the motor vehicle use map. The motorized vehicle use map allows enforcement of the decisions made through this project – no additional prohibitions are needed to enforce the motor vehicle use identified on the motor vehicle use map.</p>		

Subject: Management		Response #: MGMT-15, Forest Plan Standards
Letter-Comment #: 467-33	MWA members suggest the authors have it exactly backwards. The site-specific Custer Forest Plan with its stronger recreation standards is the guiding document the Custer must follow. It is not possible for a generic programmatic EIS to gut existing recreation standards developed through years of public involvement in the site-specific Custer National Forest Plan. No such effect - namely, the weakening of Custer Forest Plan standards - is examined, anticipated, or alleged in the generic Tri-State PEIS.	
<p>Response: Forest Service planning is generally done at two levels, the programmatic forest plan level and the site specific project level. Forest Plans establish Forest goals, objectives, forest-wide standards and management area standards. Suitable areas were identified for land uses across the Forest; these were identified as management areas. Management area goals, objectives and standards provide guidance for project level planning and decision-making, but are not site-specific enough to fulfill the requirements for project level analyses required by the NEPA.</p> <p>The 2001 Tri-State Off-Highway Vehicle Decision amended the forest plans of all the Forests/Grasslands covered by the decision; this included the Forest Plan for the Custer National Forest. In reality, the 2001 Tri-State Off-Highway Vehicle Decision re-affirmed the 1987 Forest Plan standard that prohibited cross country travel as noted on page 13, in Forest-wide standard 2. Recreation c. Off-Road Vehicle Use "...restrictions will provide reasonable access for public recreation, hunting and range maintenance/administration, but will confine motorized vehicles to specific roads, trails, or areas identified on a map. Vehicular access off these designated locations will be prohibited." The 2001 Tri-State Off-Highway Vehicle Decision reaffirmed the Forest Plan standard and the off-road use in the Benbow/Picket Pin areas was curtailed. Dispersed camping, parking and use have been allowed and are consistent with Forest Plan direction as well as the 2001 Tri-State Off-Highway Vehicle Decision.</p> <p>Besides amending forest/grassland plans to prohibit cross-country travel, the 2001 Tri-State Off-Highway Vehicle Decision established timeframes for site specific travel planning efforts to begin for those units that did not have a specific travel plan. The Forest had identified the Beartooth Ranger District as a high priority for travel planning and the 2004 scoping document was part of that effort. However, in 2005 the new Travel Rule set the new rules for conducting site specific travel planning efforts. This is noted in the FEIS under the Proposed Action section.</p>		

Subject: Management		Response #: MGMT-16, Dispersed Use
Letter-Comment #: 467-31	The preferred alternative violates the plain intent of the Custer Forest Plan forestwide standard for dispersed recreation, which pledges to emphasize "minimum impact camping":	
<p>Response: The Forest Plan forest-wide standard found on page 13, read in its entirety helps to frame the context for dispersed use on the Forest. It reads:</p> <p>2. Recreation</p> <p>b. Dispersed Use</p> <ol style="list-style-type: none"> 1) Dispersed recreation opportunities will be emphasized in response to public needs. 2) National Forest System lands will be identified. Signs will be used to guide the public to National Forest System lands. Brochures, maps, and other means will be developed to describe recreation opportunities available, and to emphasize minimum impact camping. 3) Dispersed use will be managed to prevent site deterioration. Generally no specific campsites will be established or maintained. Minimum impact camping techniques will be encouraged through public information. 		

Subject: Management		Response #: MGMT-17, Private Property Ingress/Egress
Letter-Comment #: 489-2 and 490-2	Also, it is nice to have an alternative way in and out of our property due to trail conditions. We have not received any notices of change from the County nor the forest service as to the legal access to our property, so these roads are, to our knowledge, still the only legal access for us. I would also like to have year long access via these roads in order to go in and come out of our land.	
<p>Response: Alaska National Interest Lands Conservation Act of 1980 (ANILCA) provides statutory authority for access to non-Federal lands surrounded by National Forest System lands located within the boundaries of the National Forest. The Forest Service must allow reasonable access for the reasonable use and enjoyment of private land; however, the access is subject to the rules and regulations of the Secretary of Agriculture. The Forest Service issues a</p>		

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Subject: Management	Response #: MGMT-17, Private Property Ingress/Egress
special use authorization to allow this access and document the rules and regulations.	

Subject: Management	Response #: MGMT-18, Management of Motorized Use
Letter-Comment #: 467-18	4. The Forest Service Should Prepare a Travel Management Plan to Complement the Motor Vehicle Use Map.
Response: Route by route evaluation was completed in the analysis (FEIS Chapter 2, Appendix C, project record) and is consistent with the 2005 Travel Rule. Education and compliance will be the focus of monitoring.	

Subject: Management	Response #: MGMT-19, Roadless
Letter-Comment #: 461-83	(Designation of motorized trails) increases the likelihood that such a route would be allowed to remain in a roadless area, when closure and/or decommissioning may be a preferable option.
Response: There are currently 13.6 miles of routes within inventoried roadless areas on the District. The Inventoried Roadless Area section of Chapter 3 provides background on the nature of both existing and proposed motorized routes within inventoried roadless areas of the District, as well as a description of the effects of the alternatives. Alternatives B, C, and B Modified would all reduce the miles of existing motorized routes, as well as the overall miles of motorized routes. All of the action alternatives would convert some existing non-system routes within inventoried roadless areas to system roads. For Alternatives B, C, and B Modified, the converted routes represent ≤0.6 miles, which is primarily for access to an established trailhead.	
The Forest Service does not believe that the existing or proposed motorized routes in inventoried roadless areas are irreversible or irretrievable, and that there may be additional mitigating circumstances. These circumstances include a strong suspicion that various inventoried roadless area mapping efforts have inadvertently included routes intended to be along the border of an inventoried roadless area rather than just inside the inventoried roadless area, and an elevated potential for mining activities to legally occur in some of the roadless areas which could significantly change the character of the areas.	

Subject: Management	Response #: MGMT-20, Forest Plan & 2005 Motorized Travel Rule Conformance
Letter-Comment #: 161-10	Reduce the number of interior access roads and motorized trails and the total miles of System roads/motorized trails within the NFS Lands; Rationale a. to conform more closely to the Forest Plan and 2005 "Rule" b. to reduce costs of management and maintenance. c. To protect Cultural Resources. d. To enhance wildlife habitat, particularly security cover for deer and bear and provide suitable habitat necessary for the recovery of the elk population in the Pryors. e. To enhance solitude.
Response: The range of alternatives addresses these various resource considerations.	

Subject: Management	Response #: MGMT-21, Route Criteria
Letter-Comment #: 68-4	Forest Service staff have intimated they are keeping these roughest of routes open as a challenge to four-wheelers. I do not see that as a proper criteria for deciding on the Forest's road system.
Response: A route's roughness was not a criterion for deciding whether to include it as part of the National Forest Transportation System. Rather whether a route was needed for the administration and management of the Custer National Forest, as well as natural resource, cultural resource considerations, and if it provided an opportunity as a loop route were the criterion.	

MISCELLANEOUS

Subject: Miscellaneous	Response #: MISC-1, Assumptions
Letter-Comment #: 136-4	One impact not considered by the DEIS is the impact from illegal use of OHVs when they are taken off of authorized roads and trails. We know that this kind of thing happens because we see it every time we go to the CNF, especially in the Pryors. There is abundant photographic

Subject: Miscellaneous	Response #: MISC-1, Assumptions
	documentation of this kind of illegal activity. We have to assume that this kind of impact is going to continue and we have to plan for it. We have to plan for the fact that some people are going to break the law, and in our planning we have to arrange the environment so that the impact is contained as much as possible.
Response: Consistent with routine NEPA practices, compliance with laws, regulations, and policies is assumed when analyzing alternatives.	
Although there is no additional funding for implementation of this decision, it is one of the Forest Service’s national priorities set by the Chief. Partnership dollars, grants and volunteer work will likely play a significant role in implementing the selected alternative.	

Subject: Miscellaneous	Response #: MISC-2, Executive Orders – 11644 and 11989
Letter-Comment #: 66-151	We request that the analysis, preferred alternative and decision-making not let Executive Orders 11644 and 11989 interfere with an equitable management of public land for multiple-uses.
411-74	The executive orders are outdated because they are addressing issues that no longer exist (sic) due to the introduction of the 2001 OHV rule and the federal 2005 OHV ruling. These executive orders should be removed from the EIS.
Response: Executive orders issued by the President of the United States provide policy direction to all Federal agencies. The Department of Agriculture conforms its policy to executive orders. The Department has indicated that they do not believe Executive Orders 11644 and 11989 conflict with multiple use management of National Forest System lands. These two executive orders broadly direct Federal land management agencies to regulate OHVs.	

Subject: Miscellaneous	Response #: MISC-3, Executive Orders and the 2005 Motorized Travel Rule
Letter-Comment #: 129-4	The Forest’s Preferred Alternative does not comply with the Executive Orders governing OHV use. All current direction and authority that allow, restrict, and prohibit vehicle use off roads on National Forest lands are tiered from Executive Order (E.O.) 11644, signed by President Nixon in 1972, and modified by President Carter’s E.O. 11989 in 1977. These executive orders should be the guiding principles for all decisions related to OHVs. The orders state that the route designation procedures “will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.” In accomplishing this The Pryors Coalition 5 broad goal, the Executive Orders specifically require that the designation of motorized areas and trails shall be in accordance with the following: 1. Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. 2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. 3. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors. 4. Areas and trails shall not be located in officially designated Wilderness Areas. We agree with the strong language above. OHVs should be permitted only where they do not excessively interfere with other recreational uses or damage natural resources. Several sections of the DEIS clearly illustrate that Alternative C would minimize user conflicts; minimize damage to soil, watershed, vegetation, or other resources; and minimize harassment of wildlife and cause less significant disruption of wildlife habitats. Therefore, it is obvious that the current preferred alternative would not meet the Executive Order's mandate.
307-17	The Forest Service is directed by Executive Orders 11644 and 11989 to "ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various users of those lands." Alternative C meets these criteria much better than Alternative B.
307-18	As directed by the Executive Orders, the Forest Service should protect the resources, (wildlife, plants and plant diversity, geological, cultural, and historical) and then determine the appropriate

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Subject: Miscellaneous	Response #: MISC-3, Executive Orders and the 2005 Motorized Travel Rule
	recreational uses that will not exceed the carrying capacity of the landscape.
394-7	The Forest's Preferred Alternative does not comply with the Executive Orders governing OHV use. ... Several sections of the DEIS clearly illustrate the Alternative C would minimize user conflicts; minimize damage to soil, watershed, vegetation, or other resources; and minimize harassment of wildlife and cause less significant disruption of wildlife habitats. Therefore, it is obvious that the current preferred alternative would not meet the Executive Orders' mandate.
461-1	The intent of the E.O. is to minimize the impacts of ORV use on forest resources and other recreationists and neighbors. The EIS must not only disclose and compare the impacts of each alternative, it must provide a plausible reasoning that the decision resulting from the disclosures in fact minimizes those impacts. Simply claiming that impacts were considered and providing cursory rationales for choosing an alternative does not meet the E.O. requirements to minimize those impacts.
461-2	We challenge how these designations can be construed to minimize impacts, as directed by the E.O., and we also challenge that a “trail” that can accommodate vehicles over 50” is really anything other than a road..... Instead, motorized trails that are designated for vehicles over 50” should be called what they are - Maintenance Level (ML) 2 roads - and maintained as such.
461-3	At a minimum, we recommend that the Forest Service provide detailed guidance on what “trail character” means. Otherwise, the Forest Service can indiscriminately convert roads to trails and the ecological impacts of a decaying road will remain unaddressed, and definitely not minimized, as required by the E.O. Second, if the Forest Service insists upon designating any motorized trails open to all vehicles, the effects of these trails should be evaluated the same way a road would be during wildlife and other environmental analysis. To make this process easier and simpler for the Forest Service and to minimize future environmental impacts of these motorized trails, it would make more sense to designate motorized trails that are open to vehicles over 50” as ML 2 roads, which would receive more regular and more stringent maintenance.
461-8	We also believe that there should be one or more alternatives that meets the requirements under EO 11644, as amended by EO 11989, to minimize effects and conflicts. The DEIS states that “[t]he 2005 Motorized Travel Rule is the agency’s implementation of these executive orders,” (DEIS p. 1-10). Simply considering the potential negative impacts for each alternative is not minimizing effects or conflicts, and the Custer NF must provide an alternative that meets the E.O. requirements.
461-15	By not incorporating the zoning approach, the DEIS failed to adequately analyze a full range of alternatives in violation of NEPA, and by not analyzing each route for potential user conflicts the DEIS failed to take a hard look at potential negative impacts in violation of NEPA. Finally, these failures ensure that any action alternative chosen will be in violation of EO 11644 as amended by EO 11989.
467-4	First and foremost, the DEIS' analysis in Chapter 3 fails to link the disclosed impacts to the Forest Service's route designation criteria set forth in section 3 of Executive Order 11644 and 36 C.F.R. § 212.55 or the Forest Service's duty in 36 C.F.R. § 212.5(b)(1) to designate only the "minimum road system needed." Nowhere in the DEIS is there a discussion addressing whether the disclosed impacts in fact meet these route designation criteria and duties.
487-1	Your travel management proposal does not follow Executive orders or direction in your Forest Plan.
Summary of Comments: The DEIS does not meet the direction set forth in the Executive Order (E.O.) 11644, signed by President Nixon in 1972, and modified by President Carter’s E.O. 11989 in 1977.	
Response: The Department of Agriculture produced the 2005 Motorized Travel Rule to be consistent with Executive Orders 11644 and 11989, and to serve as the means to implement the policy direction contained in those Executive Orders. The 2005 Motorized Travel Rule places more emphasis on considering the effects of motorized trails and areas, than of roads. Consistent with the 2005 Motorized Travel Rule, development of the Preferred Alternative specifically included considering effects of trails (there are no areas) with the objective of minimizing effects related to damage to soil, watershed, vegetation, other forest resources, harassment of wildlife, disruption of wildlife habitats, and conflicts between motorized trail use and existing uses. No substantive conflicts between types of motorized trail uses have been identified on a site-specific basis. Appendix C contains specific proposed actions aimed at minimizing effects in the above listed areas, such as the season of use for Meyers Creek and Lodgepole Creek trails, season of use designation on trails in the Pryor Unit, and contingent designation of a portion of Punch Bowl until erosion concerns are	

Subject: Miscellaneous	Response #: MISC-3, Executive Orders and the 2005 Motorized Travel Rule
<p>addressed. In addition, the Preferred Alternative specifically avoided designating certain routes or changed existing season of use designations to minimize impacts to the above listed resources. One example of this was not proposing a motorized route in the bottom of Bear Canyon to avoid adverse effects to riparian and the rich diversity of wildlife. In general, the additional emphasis of minimizing effects on the above listed resources was used not only for proposed trail designations, but also for proposed road designations.</p> <p>Forest Service guidance allows for the designation of three basic types of motorized trails: those that are open to all OHVs, those open to vehicles less than 50 inches, and those open only to motorcycles. Regardless of the type of trail designation, the effects of any designations are evaluated – they are not avoided by designating routes as trails rather than roads.</p>	

Subject: Miscellaneous	Response #: MISC-4, 2001 Tri-State OHV Decision
Letter-Comment #: 66-10	Figure 2.2 and 2.7 on page 14 of Chapter 2 in the 3-State OHV EIS and Decision clearly shows that existing tracks used by motorcycles are to be considered as motorized trails (http://www.mt.blm.gov/ea/ohv/Chapter2.pdf). The evaluation must consider these routes and is in violation of the 3-State OHV agreement.
66-30	We ask that all BLM and Forest Service actions include proper recognition of the agreement behind the 3-State OHV and National Route Designation decisions which allow continued use of the existing networks of motorized roads and trails without massive motorized closures.
387-33	Because your district did not comply with the requirement of the 01 3 State OHV Rule, we believe the proposed closures are therefore arbitrary and capricious.
<p>Response: The Custer National Forest has complied with the 2001 Tri-State OHV Decision. The 2001 Tri-State OHV Decision required National Forests in Montana, such as the Custer, to execute a Forest Order that eliminated cross-country vehicle travel, along with posting signs, and adding notices to travel management maps by July 1, 2001. The Custer National Forest completed these steps in June of 2001. The Decision provided for the continued use of existing motorized routes until route specific designations for motorized use was completed. In compliance with the 2001 Tri-State OHV Decision, the Beartooth Ranger District Travel Management Planning effort is the process being used to determine the route specific designations for motorized use.</p>	

Subject: Miscellaneous	Response #: MISC-5, Mitigation by Adding Routes
Letter-Comment #: 66-17	Trail closures in semi-primitive motorized areas represent a significant amount of the total available both forest-wide and area-wide. These are the highest value routes to motorized recreationists and the impact would be significant. This impact is unacceptable unless these routes are mitigated with new routes of equal value.
66-18	The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.
66-27	Therefore, the route designation process and travel planning actions must include an effective mitigation process that will meet the requirements of the designated route rule and not put an unreasonable burden on motorized recreationists.
421-27	It would seem the team did not consider means on how to mitigate any foreseeable problems and rather opted for closing it to only OHV use.
<p>Response: Alternative A was included as an option that would provide maximum motorized opportunities available with the existing system and non-system routes, which is essentially the existing condition (see the Alternative A description in Chapter 2 for further details). The Forest Service considered various mitigation measures to address resource concerns, such as season of use restrictions, designations contingent upon completing mitigation work, and not designating routes for public motorized use. (See alternative descriptions in Chapter 2 for further details.)</p>	

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Subject: Miscellaneous		Response #: MISC-6, Mental & Physical Health
Letter-Comment #: 66-68	We also ask that the tremendous value of OHV recreation for both mental and physical health benefits (equivalent to jogging) be recognized in the evaluation and used to justify an increase in motorized recreational opportunities.	
Response: All recreational values are recognized in the range of alternatives. The alternatives varied in addition or subtraction of motorized routes in recognition of the variability in motorized and non-motorized recreational values.		

Subject: Miscellaneous		Response #: MISC-7, Access Points
Letter-Comment #: 386-14	Alt. B has 14 access roads in about 22 miles of perimeter of the west and south FS boundary. Alt. C has eight. The 2005 FS Motorized Rule promotes adequate motor vehicle access to FS land (one per five miles of boundary). Alt. B allows once access point per 1.6 miles. Alt. C allows one per 2.75 miles. So, Alt. B allows excessive motorized access by FS standards, and Alt. C is still allowing nearly twice the access recommended.	
406-10	I believe CNF's legal charge (not to mention budget) is to provide only reasonable motorized access to the forest with a goal of one access point (motorized or non-motorized) per 5 miles of forest boundary.	
Response: The access goal identified in the comment is in the Custer National Forest Land Management Plan and not in the 2005 Motorized Travel Rule. The Plan states, "The goal of providing for public access to and within the Forest is to provide at least one access point per five miles of administrative boundary where there is not adequate access from inside the National Forest System land." The goal does not promote a certain quantity of access routes as a maximum standard or indicate what is excessive.		

Subject: Miscellaneous		Response #: MISC-8, Inventoried Roadless Areas
Letter-Comment #: 66-104	Based on our experience with past actions and current proposed actions, motorized recreationists will lose significant recreational opportunities and suffer cumulative negative impacts from the Roadless Rule. Therefore, we disagree that this issue is out of scope. We request that the cumulative negative impact of the Roadless Rule, past actions and future actions be considered a significant issue and adequately considered in the document and decision-making.	
461-11	We have identified numerous instances of inadequate analysis in our comments on the DEIS's Affected Environment section. However, in general, the effects of each alternative on the character of Inventoried Roadless Areas ("IRA") were never adequately analyzed. Table 1-2 summarizes the road segments for motorized use in the IRAs for each alternative, but there is no further analysis of potential impacts to IRAs in any other section of the DEIS. This is especially troubling since the preferred alternative allows 300 ft dispersed camping off all motorized routes except two. No information was provided on how enforcement will be directed to ensure prevention of illegal use. This lack of analysis and the decision not to include a section evaluating potential impacts to IRAs is arbitrary and capricious, and in violation of NEPA.	
Response: The effects of designating roads within IRAs have been added to the FEIS and are addressed in the Chapter 3 Inventoried Roadless Area section.		

Subject: Miscellaneous		Response #: MISC-9, R.S. 2477
Letter-Comment #: 66-48	We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.	
66-85	We request that these travelways remain open based on; (1) their history of community access, (2) the access that they provide to interesting historical sites, and (3) their importance to community access. We request that the document evaluate all of the issues surrounding RS 2477 including the cumulative negative impact of all past closures of RS 2477 routes which has become a significant impact on motorized recreationists.	
66-86	We request that any routes proposed for closure and in existence before 1976 be considered as having RS 2477 rights-of-way in order to provide citizens with access to public lands.	
Response: The 2005 Motorized Travel Rule exemption for legally documented rights-of-way held by State, county, or other local public road authorities covers rights-of-way under R.S. 2477 that have been adjudicated through the Federal court system or otherwise formally established. However, Congress has placed a moratorium on rulemaking		

Subject: Miscellaneous	Response #: MISC-9, R.S. 2477
concerning recognition of any unresolved R.S. 2477 rights-of-way claims. Identification of unresolved R.S. 2477 rights-of-way in the FEIS would be contrary to the Congressional moratorium and may give the appearance that the Forest Service is trying to establish the validity of R.S. 2477 right-of-way claims.	

Subject: Miscellaneous		Response #: MISC-10, Route Inventory
Letter-Comment #:		
66-87	We request that sufficient background data be collected to quantify the existing conditions in the resource areas of interest. Then, if a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement to each resource area. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. In other words, the public needs to know how the decision made, the data on which it was based on including the source, and whether the data was adequate to substantiate the claimed environmental improvements.	
74-2	However, we understand that even Alternative A does not include many of these commonly used trails in its inventory - for which our Club provided GPS files. It has been suggested to us that you should include and consider this information in the development of a Travel Plan.	
97-1	The collaborative process was flawed in that on the ground routes and trails that was identified by the Magic City 4x4 club and Rimrock 4x4 club in conjunction with Families For Outdoor Recreation were not shown on the maps used for this process. These maps were turned in to the Forest Service by FFOR.	
132-1	Trails identified by Families For Outdoor Recreation, Magic City 4 x 4, and Rimrock 4 x 4, were not shown on the map. And these maps were turned into the forest service.	
215-3	..the Forest Service ignores dozens of GPS'd and legally used trails because they did not appear in the 1987 mapping. Then, they suggest that Alternative A is an increase in trails when it significantly reduces motorized trails.	
412-7	Missed trails continually not mapped even when advised - We have submitted trails to be added to the proposals in 2004 and again during the Collaborative Meetings. These trails have never been presented on the maps nor has their absence been addressed. We were told by the staff at the Collaborative Meetings that the trails we rote in would be addressed and mapped in the DEIS. This didn't happen. The trails in question are in the area and linking trails @2104, 20852, and 2104A1. Why were these trails omitted from the travel planning process each time? It is misleading to tell us to simple draw the roads and note why we are drawing these roads, and it leads to the question of what else was missed during this process?	
421-11	Local clubs, have used GPS units to map the trails that are currently used by many groups, which have been turned in to the Forest Service, yet these trails were not in the DEIS, why?	
Summary of Comments: The route inventory does not include all the existing routes currently on the ground.		
Response: The Custer National Forest attempted to identify all motorized routes by conducting route inventories during 1999 and 2000. In 2001, the Tri-State OHV Decision and subsequent Forest Order recognized existing unauthorized routes and allowed their use, but prohibited the creation of any new unauthorized routes. Based on subsequent field reviews of the inventory, the Forest has a high confidence level in the inventory. Still, there is potential that routes may have been missed in the inventory and the Forest has accepted any information related to additional routes that may not be in the inventory. No GPS locations of missing routes were supplied to the Forest; all potential missing routes were described verbally or through lines on maps. The Forest has attempted to locate these routes through field investigation, aerial photography, and/or satellite images. In all but one case, the Forest was unable to find the described route or it appeared to be a route already in the inventory.		

Subject: Miscellaneous		Response #: MISC-11, Existing Condition
Letter-Comment #:		
461-10	In our view, the appropriate baseline of existing system routes consists of those routes which have been documented in relevant NEPA analysis. We believe that any routes lacking documentation (including routes which were constructed or came into being before NEPA was enacted) should be analyzed as new unauthorized routes, in recognition of that fact that there is no record of administrative decision or analysis addressing the environmental impacts of motor vehicle use on these routes. To address this issue, we strongly recommend that the Forest Service develop a "documentation" spreadsheet which would supplement the description of the no action alternative, and would eventually accompany the MVUM. This spreadsheet would summarize the NEPA decisions,	

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Subject: Miscellaneous		Response #: MISC-11, Existing Condition
		together with other relevant documentation (e.g., formal adoption of road/trail objectives for the route; information establishing consistent maintenance expenditures over time, etc.) supporting the inclusion of each route on the authorized system. We have included a sample spreadsheet to serve as an example. (See Appendix A).
467-6		While establishing a "baseline existing condition" is understandable and important, the Forest Service should establish this baseline only after conducting a comparative analysis with the baseline travel system established by the 1987 Travel Plan. Its the 1987 Travel Plan baseline that provides the legal and authorized planning baseline - not the DEIS' "baseline existing condition." The "baseline existing condition" is most relevant in understanding the existing impacts to the landscape for NEPA purposes but shouldn't serve as the effective starting point for substantive travel designation decisions.
<p>Response: There is no legal mandate to use or definition for determining the baseline or existing condition used in travel management planning. Baselines and existing conditions are discretionary measures provided when appropriate to assist in displaying the relative effects or future conditions of proposals. After consideration of several factors, including the guidance associated with the 2005 Motorized Travel Rule and the regulations for implementing NEPA, the Forest determined that it was appropriate to identify the No Action Alternative as the existing system roads on the District, and to allow Alternative A to represent the existing condition given how closely it reflects the motorized routes identified in the inventory.</p>		

Subject: Miscellaneous		Response #: MISC-12, Routes Considered
Letter-Comment #: 124-1		Generally, we believe motorized vehicle travel should be limited to the older-two track roads that existed during the 1980s.
124-2		Where duplication of roads existed from that era, the better tracks from a resource protection standpoint should be legitimized and excess tracks and those contributing to resource abuse should be closed.
307-27		The Forest Service should seriously consider closing all routes not specifically created through a legal process, with the exception of necessary reroutes for administrative purposes.
<p>Response: The 2005 Motorized Travel Rule allows both system and non-system routes to be considered for designation for public motorized use.</p>		

Subject: Miscellaneous		Response #: MISC-13, Cumulative Effects – Loss of Motorized Opportunities and Access
Letter-Comment #: 66-1		The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the Beartooth and Sioux Ranger Districts Travel Management Plans.
66-5		...NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where “several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS.” ...The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed.
66-16		The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
66-18		The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.
66-52		Motorized closures are being enacted incrementally and without adequate disclosure and consideration of the cumulative effects....This trend is being ignored at all levels including the actions listed in Table 2. The plan for this project area does not recognize and address this trend. The forest plan for the Custer National Forest does not adequately recognize and address this trend. The national planning policy does not recognize and address this trend. Therefore, this cumulative effect is being effectively ignored and that failure to notice will result in the ultimate

<i>Subject:</i> Miscellaneous	Response #: MISC-13, Cumulative Effects – Loss of Motorized Opportunities and Access
	loss of any meaningful motorized recreational opportunities and the creation of defacto wilderness from large blocks of multiple-use lands. Facts do not cease to exist because they are ignored.--Aldous Huxley. We ask that this significant negative cumulative effect on motorized recreationists be adequately recognized, evaluated and mitigated at all levels starting with this project.
66-62	Table 2 is a partial listing of projects that have had a negative impact on motorized recreationists. All of these actions and others must be included in the tabulation and evaluation of cumulative negative effects on motorized recreationists....Additionally, adequate mitigation must now be implemented to counter the cumulative negative effects that motorized recreationists have experienced.
66-63	The cumulative negative effects of more restrictive travel plan decisions include the concentration of use on fewer miles of road and trail, such that traffic density is increased and recreation enjoyment is reduced....Travel decisions affecting public lands that restrict motorized recreation in one area may consequently increase motorized use in another where site-specific travel plans are not yet in place. Cumulatively then, this "leapfrog" effect may increase resource damage, create more law enforcement problems, generate discord between motorized and non-motorized recreationists, and make future site-specific travel planning more difficult. This cumulative negative effect must be adequately considered as part of this project.
66-71	We request a corrective action and over-arching mitigation plan that will undo the significant impact that all cumulative motorized access and motorized recreational closures has had on motorized recreationists over the past 35 years. We also request a monitoring program be provided by an unbiased third-party to assure that this correction occurs within our lifetime.
66-79	The magnitude of the cumulative effect of the motorized closure trend must be identified and evaluated as a significant impact on motorized visitors. We request an adequate evaluation of the significant cumulative loss in miles, acres, and quality of motorized recreation and access opportunities within public lands as required under 40 CFR 1508.7 and 1508.25, and guidelines published by the Council on Environmental Quality "Considering Cumulative Effects Under the National Environmental Policy Act". Table 2 is provided as a starting point of the projects that need to be considered as part of that evaluation.
66-80	We request that the trend of cumulative closures, the cumulative negative impacts associated with that trend and the reasonable alternative of maintaining the existing level of motorized access and motorized recreation must be adequately addressed. We also request that the proposed action include an adequate mitigation plan to compensate for the significant impact from the cumulative effect of all past actions that have affected motorized access and motorized recreationists.
66-83	A fair travel management process would start with a comprehensive inventory of all existing motorized routes in use by the public....The cumulative loss of motorized recreation and access opportunities within public lands has been significant. In order to avoid further cumulative negative impacts, we request that the majority of existing motorized routes remain open and the closure of an existing motorized route be offset by the creation of a new motorized route.
66-102	In order to avoid contributing further to the significant cumulative loss of motorized recreation and access, we request that the closure of a motorized trail or access should be offset by the creation of a new motorized trail or access of equal value.
66-107	Additionally, there are millions of other multiple-use visitors who use motorized access for sightseeing, exploring, picnicking, hiking, rock climbing, skiing, mountain biking, riding horses, camping, hunting, RVs, target shooting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and gathering of firewood, rocks, natural foods, etc....We request that the cumulative needs of these visitors be accurately quantified and the cumulative negative impacts of closures on these visitors be considered in the decision-making.
66-119	We request that the impacts associated with the significant loss of motorized recreation and access opportunities be adequately addressed in the environmental document and decision-making, i.e. Where will displaced motorized visitors go? And, due to the lack of any reasonable motorized access and recreation opportunities, what will they do? Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.
66-120	The cumulative negative effect of not analyzing each road and trail segment is tremendous. We

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Subject: Miscellaneous	Response #: MISC-13, Cumulative Effects – Loss of Motorized Opportunities and Access
	request that the decision-making be based on the individual and site-specific merits of each travelway. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.
66-129	We request that the underlying principle of all new travel management actions be to maintain the existing level of opportunities for motorized visitors. We also request that the document and decision-making; (1) evaluate the cumulative negative effect of past strategies to eliminate motorized recreation opportunities including the conversion of multiple-use lands to all designations of non-motorized areas including pre-Columbian scheme, monuments, wilderness, wilderness study areas, roadless areas; and (2) enact actions that will offset the cumulative negative effect of past strategies to eliminate motorized recreational opportunities.
66-131	The environmental document should consider the following visitor profiles in addition to OHV enthusiasts as motorized visitors who use roads and trails within public lands. People out for weekend drives, sightseers, picnickers, campers, hunters, hiking, rock climbing, target shooters, fisherman, snowmobile enthusiasts, woodcutters, wildlife viewing, berry and mushroom pickers, equestrians, mountain bikers, and physically challenged visitors who must use wheeled vehicles to visit public lands....We request that the significant impact from all cumulative statewide-motorized closures on all of these visitors be included in the environmental document.
66-134	We request that the cumulative negative effects of these policies be thoroughly evaluated so that a reasonable travel management decision is made. The evaluation of cumulative negative impacts should include all associated impacts such as social, economic, cultural, and the recreation needs of motorized visitors.
66-137	The cumulative negative impact of the overwhelming number of proposals has been decision-making that does not provide for the needs of the public and a significant reduction in multiple-use and motorized access and recreation opportunities. We request that this cumulative negative impact be adequately evaluated and factored into the decision-making for this action. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts on the public associated with the overwhelming number of NEPA actions.
66-138	Additionally, this cumulative negative effect has lead to the loss of opportunity for motorized recreationists to further the awareness and education of other motorized visitors in areas such as proper riding ethics, safety, and environmental protection. This cumulative negative effect has also reduced the opportunity for motorized recreationists to improve and maintain existing motorized opportunities. This cumulative negative impact includes reduced maintenance of trailheads and trails and reduced ability to undertake mitigation projects to protect the environment and public safety. We request that these cumulative negative effects be addressed in the analysis, preferred alternative and decision-making.
66-142	Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts associated with inadequate use of education measures in past actions.
66-143	We request that the cumulative negative effect of reduced recreation and access opportunities for motorized visitors within the project area be adequately considered in the document and decision-making.
66-144	We request the evaluation of the cumulative negative impacts from management goals that tend to concentrate visitors to narrow corridors and reduce recreation opportunities for motorized visitors.
66-154	Therefore, the analysis should also evaluate the cumulative negative impacts of motorized road and trail closures and the conversion of multiple-use lands to limited-use lands on fire management, timber management, and firewood gathering.
Summary of Comments: The DEIS must consider the cumulative effects associated with designating motorized use.	
Response: The cumulative effects of travel planning on recreation opportunities was addressed in the Recreation sections of the DEIS and FEIS.	

Subject: Miscellaneous		Response #: MISC-14, Peer Review
Letter-Comment #: 66-95	Therefore, peer reviewed reports and recommendations are mandatory in order to protect the public from personal opinion. We request that an adequate peer review plan and process be used for all impact analyses and include experts that are neutral about motorized recreation.	
Response: Effects analysis has been conducted using best available scientific information and peer reviewed literature (see References). The interdisciplinary team also reviewed literature cited in public comments on the project (project record). The methods used for analysis by each resource specialist are described throughout Chapter 3. The DEIS and FEIS, as well as the project record are available for public review and scrutiny. Factual corrections, errors, omissions brought to our attention through comments (oral or in writing) have been made in the FEIS.		

Subject: Miscellaneous		Response #: MISC-15, Monitoring
Letter-Comment #: 40-18	There should be an effective program for monitoring, evaluation and adaptive management to assure that effects of travel management are identified and management modified where necessary to reduce effects.	
41-11	Finally, no alternative is complete without an ongoing monitoring program to assess the actual impacts of the implemented plan. This process should be explicit in the DEIS for the public to offer comments on as well.	
425-8	Question: How will that monitoring be accomplished? If that monitoring indicates adverse effects under Alternative B-the preferred Alternative if accepted-what then? How will those adverse effects, if any be adjusted? How will the public be advised and how will those adverse effects be reversed? Also, what has been done to date under Monitoring and Evaluation? Nowhere in this DEIS is it indicated that such activity is being done.	
467-19	The Forest Service's largely exclusive reliance on enforcement and education is also dangerous given the DEIS' failure to incorporate any monitoring plan and, instead, to only mention, offhandedly, that "(m)onitoring and evaluation could be used to determine if physical, biological, social, and economic effects of implementing any alternative occur as predicted." DEIS at 2-11. Simply put, monitoring isn't optional: it must be used and a monitoring plan must be provided. 36 C.F.R. § 212.57.	
508-1	The plan needs to specifically address monitoring of these resources no matter the alternative selected.	
Summary of Comments: There should be a monitoring plan for travel management.		
Response: Monitoring has been ongoing, and contributed to the knowledge of issues and concerns that drove alternative development in travel management analysis. Monitoring provided valuable information about cultural, soil, vegetation, water, fish and wildlife concerns, etc. and will continue to do so in the future.		
The responsible agency official must monitor the effects of motor vehicle use on designated roads and trails, consistent with the applicable land management plan (Forest Plan), as appropriate and feasible (36 CFR 212.57). The FEIS Chapter 2 includes Forest Plan direction for monitoring off-road-vehicle use and damage.		

Subject: Miscellaneous		Response #: MISC-16, NAAQS
Letter-Comment #: 40-24	...we recommend that the FEIS identify Travel Plan consistency with NAAQS and other applicable air quality requirements.	
Response: Air quality across the District is considered good to excellent. All areas within and immediately adjacent to the District currently meet all state and federal air quality standards. The nearest area of non-attainment is Laurel, MT (approx. 30-50 miles north/northeast) and concerns SO(2) levels. Implementation of any alternative is expected to maintain air quality conditions due to 1) good dispersion characteristics across the District, 2) low inversion potential across the District, 3) low emissions from vehicles relative to other potential sources, and 4) reduced route miles open to motorized vehicles under all alternatives from existing conditions. Compliance with state and federal air quality standards would occur under all alternatives.		

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Subject: Miscellaneous		Response #: MISC-17, People with Disabilities and Aging Populations
<u>Letter-Comment #:</u> 66-22	The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles.	
66-106	We request that the travel management process seek out and document the needs of all motorized visitors including those who traditionally use the primitive roads and trails, plus the handicapped, elderly, and physically impaired as required under 40 CFR 1506.6	
66-118	We request that the proposed action adequately address and comply with the recommendations of the Study conducted to address P.L. 105-359 including items 1 and 7.	
66-124	We request that all the roads, trails, and features of interest be analyzed for the access and recreation opportunity that they provide for handicapped, elderly, and physically impaired visitors.	
155-10	Beartooth District interdisciplinary team should use all means possible to insure the OHV recreational experiences by the aging and disabled population are met by leaving all possible roads and trails open in the limited amount of acres available for motorized use in the Pryor Mountain range.	
232-9	..allow official possessors of "disabled" status access to public lands on OHVs, but with speed restrictions commensurate with that of the rest of use equestrians, equestriennes, hikers, and the native critters.	
291-1	I am unable to walk great distances and use the Benbow road to access the area I wish to hunt or fish. I do not own an ATV and can no longer ride on horse back. If the road is closed I would no longer be able to enjoy the area.	
387-22	Any more loss of multiple use trails in Montana will severely impact the aging population of the entire U.S. and this action is completely unnecessary. The FS must consider this very large population and their needs.	
396-3	...these restrictions amount to blatant discrimination against the partially disabled and elderly, who are physically incapable of accessing the forest by other methods.	
387-22	Any more loss of multiple trails in Montana will severely impact the aging population of the entire US and this action is completely unnecessary. The FS must consider this very large population and their needs.	
411-40	Access for all disabled persons and families with young children is an important aspect of the Custer Partnership Agreement. Access ensures the continued enjoyment for everyone, regardless of his or her physical abilities. It is important to create access areas for those who are unable to enjoy public lands through their own mobility or the people they are caring for. As people age, many face physical limitations but still continue wanting to use public lands and reasonable and appropriate accommodations must be made for the many levels of individuals.	
<u>Summary of Comments:</u> There should be special access considerations for visitors with limited mobility or disabilities.		
<u>Response:</u> As indicated in Section 1.4.2.2 of the DEIS, special provisions aimed at providing people with disabilities motorized opportunities not available to all forest users have not been included in this proposal. In the comments and responses on the 2005 Motorized Travel Rule published on November 9, 2005 in the Federal Register, the agency states, "Under section 504 of the Rehabilitation Act of 1973, no person with a disability can be denied participation in a Federal program that is available to all other people solely because of his or her disability. In conformance with section 504, wheelchairs are welcome on all National Forest System lands that are open to foot travel and are specifically exempt from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery-powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service's travel management program (7 CFR 12e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory". This concept also applies to providing special provisions for aging populations that may have limited mobility.		

Subject: Miscellaneous		Response #: MISC-18, Visitor Use Data
Letter-Comment #: 66-31	The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.	
66-40	The agency needs to emphasize data and real observations such as ours to establish public need and resources allocation versus paid representatives, attorneys, and form letter comments sent in by non-motorized groups because they are not an indicator of actual visitors to the project area. We ask that the evaluation and alternative development carefully consider the true needs of the public for multiple-use recreational opportunities as demonstrated by the references cited above and implement recreation resource allocation based on the large number of visitors that enjoy multiple-use and motorized recreational opportunities and the relatively small number of wilderness visitors.	
74-1	We believe more accurate use studies should be completed prior to restricting access to what we have experience as the primary users of the Pryors - motorized users.	
421-14	This survey is not an accurate representation of who uses the Custer! ... Can one survey be enough to correctly summarize the usage of each user group for the analysis's used in the DEIS. ...By talking with groups in our Partnership we think the Ratio should be 1 hiker or walker in motorized areas to 20 OHV users.	
Summary of Comments: The visitor use data used for the analysis is not an accurate representation.		
Response: NEPA requires the use of the "best available" information when preparing an environmental analysis, which included visitor use data. The Forest identified and used the best available information in identifying use levels and trends for this analysis, including multiple studies conducted at varying geographic scopes. The geographic areas included the Forest, Greater Yellowstone, and Northern Rocky Mountains.		

Subject: Miscellaneous		Response #: MISC-19, Increase in OHV Use
Letter-Comment #: 421-15	The Forest Service has not addressed the issue of the increase in OHV users in the last 10 years.	
Response: Increases in OHV use are included in the cumulative effects analyses in the resource sections of Chapter 3.		

Subject: Miscellaneous		Response #: MISC-20, Notice of Intent
Letter-Comment #: 461-84	This rule clearly states that the scoping period will begin after the publication of an NOI to prepare an EIS, and that the agency shall invite the participation of interested parties; the process leading up to the NOI's publication can be considered pre-scoping.	
<p>Response: A summary of public involvement and participation efforts is described in at the beginning of FEIS Chapter 2 (as well as in the DEIS). Forest Service policy for conducting scoping applies to all proposed actions which require environmental analysis; it is not limited to the preparation of an environmental impact statement (EIS) (FSH 1909.15, Chapter 10, section 10.3, and chapter 30, section 30.3). The purpose of scoping is to identify early-on the scope of issues to be addressed and for identifying significant issues related to the proposed action. Scoping for the Beartooth Ranger District Travel Management proposal was begun January 30, 2004 and planned to close May 1, 2004. The scoping period was extended to September 1, 2004 because of intense public interest and the public's desire to examine on-the-ground the proposed action. The Forest Service determined in July 2007 to prepare an EIS for the Beartooth Ranger District Travel Management Proposal and promptly filed a Notice of Intent (NOI) to prepare an EIS in the Federal Register (72FR40829). This is consistent with the CEQ regulations at 40 CFR 1501.7 regarding scoping and agency polices as provided for in §1507.3.</p> <p>Public meetings were conducted in several of the communities adjacent to the Beartooth Ranger District in 2004 following the issuance of the scoping document. Public meetings were also held in some of the same communities to discuss process changes as a result of the issuance of the 2005 Motorized Travel Rule. In early 2007 several collaboration meetings were conducted to provide opportunities for the public to hear various individual and group opinions, explore areas of common ground, and provide resource and regulatory information. No specific collaborative alternative was developed as a result of those meetings; however, some points of agreement were reached and are disclosed in Chapter 2 in the table Road and Trail Points of Agreement Identified During Collaborative Meetings. The</p>		

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Subject: Miscellaneous	Response #: MISC-20, Notice of Intent
NOI identified that when the DEIS was distributed, it would be available for a 45 day comment period.	

Subject: Miscellaneous	Response #: MISC-21, Non-System Routes
Letter-Comment #: 461-6	Unfortunately, each action alternative adds non-system routes to the existing system. These non-system routes may have been created in violation of 36 CFR 261.15(h) which states, “[i]t is prohibited to operate any vehicle off National Forest System, State or County roads: (h) [i]n a manner which damages or unreasonably disturbs the land, wildlife, or vegetative resources.” In order to have an adequate range of alternatives, the DEIS should have developed an alternative that does not add non-system routes to the existing system.
Response: The existing National Forest system roads and trails on the District do not entirely meet the administrative, utilization, or protection needs of the District. For example, several roads in campgrounds, administrative sites, and to access recreation residence tracts are not currently identified as system routes. Consequently, an alternative that does not add any non-system routes to the system is not reasonable.	

Subject: Miscellaneous	Response #: MISC-22, 36 CFR 212.5(b)
Letter-Comment #: 461-7	We feel there should be one or more alternatives that meets the requirements of 36 CFR 212.5(b)(1) that responsible officials “must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands;” and also meets the requirements of 36 CFR 212.5(b)(2) that responsible officials “identify the roads on lands under Forest Service jurisdiction that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for non-motorized trails.”
461-76	In this process the Custer-Beartooth District should be determining both the minimum roads system, including identifying roads for decommissioning, in addition to designating motorized trail needs. This includes utilizing a full roads analysis that includes maintenance level 1-5 roads. Travel Management planning direction, as found in the regulations and agency directives, includes the entire motorized travel system and the process must provide for a comprehensive transportation plan that applies both Subparts A and B of the Rule.
461-78	Additionally, the road designations required under § 212.50 must also “be consistent with the applicable land management plan. 70 Fed. Reg. at 68268. Consequently, the minimum road system (subpart A) must be determined in concert with the process of designating a motorized vehicle system (subpart B) in order to assure conformity with applicable Forest Plans, and to comply with the objectives of both the TMR (36 CFR § 212 et seq.) and Forest planning rules (36 CFR § 219 et seq.). Initiating subpart B independent of the minimum road system may conflict with the applicable Forest Plan’s resource management objectives in regards to (1) environmental objectives for ecosystem sustainability such as road density standards, wildlife habitat, species diversity, soils, watersheds; and (2) fiscal resource objectives, such as economic sustainability. 36 CFR 219.10(a)(b).
461-79	Science-based assessments are needed to address the specific criteria for roads designation under section 212.55, and are required for the minimum road system determination under section 212.5. In addition, this roads analysis must include all maintenance level roads, not just ML 3, 4 and 5. The DEIS should provide an appendix or reference a project file that demonstrates how the complete roads analysis was used to determine the minimum road system. We look forward to seeing this information in the Final EIS. A comprehensive science-based determination of a minimum road system must be implemented in coordination with the motorized use designation process to assure the travel plan meets applicable Forest Plan’s resource management objectives.
461-80	Accordingly, failing to implement subpart A and subpart B as a comprehensive and unified regulatory scheme will lead to likely conflicts with Forest Plan economic objectives. The maintenance of unnecessary roads that are designated prior to the determination of a minimum road system will result in the unnecessary wasting of fiscal resources. The FS requires the minimum road analysis to “reflect[s] long-term funding expectations. 36 CFR 212.5. If roads are first designated, maintained and then later closed once the minimum footprint is determined, the result will be conflict with Forest Plan fiscal management objectives, which must mandate fiscal sustainability. 36 CFR 219.10(a).

Subject: Miscellaneous		Response #: MISC-22, 36 CFR 212.5(b)
461-81	In conclusion, the Beartooth District must necessarily initiate a forest-wide travel analysis before a final decision is made. We request to receive a copy of that travel analysis. This analysis includes the identification of a minimum road system as required under Subpart A, integrated with the designation of roads and trails, pursuant Subpart B. Failure to determine the minimum road system analysis needed to administer the National Forest System lands, in concert with designating roads and trails for motorized use, compromises the agencies purpose: to determine the minimum transportation system necessary to provide “safe and efficient travel”; and the “administration, utilization, and protection of NFS lands. See 36 CFR 212.5(b); 70 Fed. Reg. 68264-65.	
467-7	However, the DEIS does not appear to contain the required science-based Roads Analysis which, as a connected and cumulative action, should be included, at the least, as an Appendix and made publicly available, if not considered through the NEPA process itself.	
<p>Response: This travel management planning process is intended to result in identification of the minimum road system necessary to meet the utilization (including recreation), protection, and administration needs of the District. Consistent with 36 CFR 212.5(b)(1), this process has involved the “science-based roads analysis” and “broad spectrum of interested and affected citizens, other state and federal agencies, and tribal governments” necessary for determining the minimum road system needed (see Chapters 2 and 3 of the FEIS). Chapters 1 and 3 identify consistency with the Forest’s land management plan and other statutory and regulatory requirements. Appendix C and Chapter 3 disclose measures proposed in Alternative B Modified to minimize adverse resource impacts and disclose the long-term funding expectations.</p> <p>This process has also been used to identify those system roads no longer determined to be needed, by alternative, to meet forest resource management objectives at this time consistent with 36 CFR 212.5(b)(2). Appendix E provides a list those routes that are potentially suitable for decommissioning. An analysis was also conducted to determine if these routes were suitable for non-motorized trails, which is contained in the Project Record.</p>		

Subject: Miscellaneous		Response #: MISC-23, Private Inholding Access
Letter-Comment #: 411-36	Access for grazing leases and solving user conflict should be a higher priority for all involved parties. Roads and trails leading to private land holdings, such as cabins, should be granted and access to these areas leading up to private property should be facilitated.	
421-4	Access for grazing leases and solving user conflict should be a high priority for all involved parties. Roads and trails leading to private land holdings, such as cabins, should be granted and access to these areas leading up to private property should be facilitated.	
<p>Response: Alaska National Interest Lands Conservation Act of 1980 (ANILCA) provides statutory authority for access to non-Federal lands located within the boundaries of the National Forest. The Forest Service must allow reasonable access for the reasonable use and enjoyment of private land; however, the access is subject to the rules and regulations of the Secretary of Agriculture. The Forest Service issues a special use authorization to allow this access and document the rules and regulations.</p>		

Subject: Miscellaneous		Response #: MISC-24, Range of Alternatives
Letter-Comment #: 66-4	Therefore, we request that the project team formulate a wide range of alternatives including at least one Alternative that maximizes motorized recreational opportunities in the project area and addresses the following: <ul style="list-style-type: none"> • The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation. • The pro-recreation alternative should strive to provide for the current and future demand for OHV recreational routes. • Alternatives should include areas where OHV trails can be constructed and maintained when demand increases. • Where appropriate, the agency should use this process to analyze the impacts of any future route construction and include those in the decision. • Direction for the required process to construct new routes should be incorporated into each alternative. • At least one alternative should maximize the ability to construct new sustainable trails to meet the current and future need. • The project team should develop management alternatives that allow for proactive OHV management. • All alternatives should include specific provisions to mark, map and maintain designated roads, trails and areas in cooperation with OHV users. • All alternatives should include direction to engage in cooperative management with OHV groups and individuals. 	

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Subject: Miscellaneous		Response #: MISC-24, Range of Alternatives
66-21	The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement. Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists.	
67-1	None of the action alternatives adequately meet this purpose and need with respect to motorized opportunities.	
67-7	“Motorcyclists could expect to have opportunities to ride in both units, but would not find opportunities for single track experiences.” This is not a reasonable alternative or solution to a very significant need in the project area.	
307-2	The Forest Service did not consider a full range of alternatives. Lacking is an alternative that severely limits motorized traffic in the District, especially in the Pryors Unit. ...There should have been an Alternative with 3/4 non-motorized to offset the 3/4 motorized in Alternative A.	
396-21	NEPA guidelines require that the Forest Service fully consider all options with regards to travel planning, so why has the CNF not presented an option that significantly expands motorized opportunities?	
438-2	The future need for additional OHV opportunities recognized by Forest Service Chief Dale Bosworth's comments in 2004 and as noted on page 3-21 "lack of quality opportunities", was not evaluated in the DEIS. The range of alternatives introduced did not present an alternative with this future need or with additions to the existing routes. The development of a wide range of alternatives with the construction of additional sustainable routes, both motorized and non-motorized is a function of the planning team.	
Summary of Comments: The DEIS is not have an adequate range of Alternatives.		
Response: The scope of the proposed action was refined after considering multiple factors such as the 2005 Motorized Travel Rule and the Chief’s timeline commitments. Through these considerations, the Forest determined that road and trail construction would be outside the scope of the project. This does not preclude route construction outside of this process, or identification of construction as a mitigation measure if significant effects are identified that warrants this type of mitigation. However, the analysis did not identify significant effects that warranted proposing construction of routes as a mitigation measure. Appendix E outlines opportunities for some route construction, in response to public comment that might be explored in the future.		
The range of alternatives include Alternative A which was intended to represent an emphasis on motorized opportunities, and Alternative C which was intended to represent a reduced emphasis on motorized opportunities. These, when combined with Alternatives B and B Modified, represent a reasonable range of alternatives. Reasonable alternatives must be viable and implementable, and cannot be speculative to be consistent with NEPA.		

Subject: Miscellaneous		Response #: MISC-25, Consistency with BLM
Letter-Comment #: 421-2	Coordination between the Forest Service and the BLM is extraordinarily important to ensuring continuity of roads, trails and services. If a trail or a road is open on one side of a managed land, it should also be open on the other side of the managed land.	
Response: The Forest has worked with the Bureau of Land Management on consistency in route designation, season of use, and identification of loop opportunities in an effort to enhance recreation experience and minimize enforcement issues related to route designations that stop abruptly at jurisdictional boundaries.		

Subject: Miscellaneous		Response #: MISC-26, Permitted Use
Letter-Comment #: 230-2	The fact of the matter is that cattle are allowed in much of this area and the roads are used to maintain this practice. Closing the roads will create a situation where only a privileged few get to enjoy the mountains without encumbrances. People complain private ranches already enjoy an unfair advantage when it come to hunting wildlife and banning roads would only favor the ranches.	
Response: Alternative B and B Modified would each provide approximately 8.6 miles of administrative use only routes that are specifically associated with permits, such as access for range improvements, transmission lines, etc. Alternative A would provide slightly less than this, and Alternative C slightly more. Given the minimal number of miles involved, that fact that permittees are only authorized to use these routes to conduct authorized activities, and the fact that the routes are available for non-motorized use, it is reasonable to conclude that permittees have not been provided extraordinary opportunities not available to the general public.		

Subject: Miscellaneous		Response #: MISC-27, Route #2014 (Benbow-Stillwater)
Letter-Comment #: 482-2	Benbow-Stillwater road is a loop trail and should be remain open to motorized use.	
Response: The Forest Service has been directed to avoid designating routes for public use if there is no legal right-of-way to access it. The Forest Service has no legal right-of-way to access many portions of the Benbow-Stillwater Road (#2014) and therefore has not designated those portions for public motorized use.		

Subject: Miscellaneous		Response #: MISC-28, Convert to Motorized Trail
Letter-Comment #: 66-6	All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.	
Response: System roads that were not proposed for public motorized use designation in Alternative B and B Modified were identified due to specific reasons, including concerns related to cultural, water, and soil resources; to reduce risk of vandalism to facilities; there was no legal right-of-way to the route, the route was parallel to another route; or the route otherwise had little motorized recreational value (i.e. route was short, steep, etc.). Designating them for less than 50 inch vehicles would not resolve these concerns. Alternative A proposed to designate most existing routes, except for a limited number due to special circumstances. There is no real opportunity to identify any additional routes for motorized use. Alternative C represents an emphasis on less motorized recreation activities. Designating system routes not designated for public motorized use would be counter to the premise of the alternative.		

Subject: Miscellaneous		Response #: MISC-29, National Historic Preservation Act
Letter-Comment #: 461-23	An alternative that fully protects cultural and archaeological resources should be fully evaluated and the likely environmental consequences of not limiting motorized access should be fully disclosed.	
Response: All action alternatives would, by design, meet the legal requirements associated with National Historic Preservation Act for cultural resources by following the Washington Office protocol. See the Project Record for the Washington Office protocol.		

Subject: Miscellaneous		Response #: MISC-30, Route #20951, #2091T, #20162
Letter-Comment #: 155-17	Routes 20951, 2091T, and 20162 are identified on the Alternative A map have not been offered a rational for closure in the DEIS and yet are not shown on the Alternative B map. Unless meaningful rationale for closure of these routes by the interdisciplinary team can be made they should remain a part of the travel plan for the present and future enjoyment of all motorized users.	
Response: Routes such as the three mentioned in this comment are non-system routes. They were not proposed to be converted to system roads in Alternative B. Converting non-system routes to system roads is an action. All such actions are analyzed in the EIS. Conversely, there is no action associated with not converting a non-system route to system road. Rationale for not converting non-system routes to system roads are contained in the project record. In this case,		

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Subject: Miscellaneous	Response #: MISC-30, Route #20951, #2091T, #20162
there were heritage concerns related to each of these routes that led to the determination to not propose converting them to system roads.	

Subject: Miscellaneous	Response #: MISC-31, Rationale for Preferred Alternative
Letter-Comment #: 91-2	One could look in vain for any DEIS information that supports the designation of B as the Preferred Alternative. The Forest Service must, of course, weigh the interest of all users in developing policies, but is also has a mandate to protect the resources under its management. If you keep this in mind, it is hard to see any reason for supporting an option other than Alternative C. In fact after review the DEIS, I find the choice of B as the preferred option mystifying. If there is additional information that was used in this decision but someone left out of the DEIS, I would appreciate the chance to review it.
124-11	Alternative B was selected as the preferred Alternative. Most of the objectives and management goals stated in the travel plan do not support this designation, but rather point to Alternative C as the most desirable. Consequently, we believe selection of Alternative B is contrary to NEPA requirements.
129-3	A third, and very serious, concern of the Pryors Coalition is that the Forest’s choice of Preferred Alternative is not supported by the thorough and detailed analysis done by the Forest’s specialists for the DEIS. The Forest identified eleven significant issues to be considered in the decision. In issue after issue the data show that Alternative C is better than Alternative B. We did not find that the Forest Service’s analysis of any of the identified significant issues supported the choice of Alternative B. (See details in Part III.)
163-3	Where is the science and logical analysis that directs the Forest to choose Alternative B for the preferred Alternative? I'm afraid the meager sentence on p. 2-11 that states "Alternative B stood out as the preferred" Alternative based on Responsible Official and interdisciplinary team deliberations." does not provide any reason or logic to explain how you arrived at this decision.
163-4	In the Economics section, Table 3.3 says 2.9% of users are OHV users and 40.2% are hikers and walkers. Why would Preferred Alternative B propose 63-66% of the Pryors be motorized in light of these demographics?
345-2	DEIS statistics hardly support Alternative B....Indeed a neutral observer would be hard-pressed to find any supporting argument for wheels other than indulgence in personal pleasure.
394-8	A very serious flaw in the DEIS is that the range of alternatives analyzed is blatantly inadequate and one-sided. This is obvious in table 3-16 which shows EVERY alternative considered designates the majority of the Pryors unit landscape for motorized use. The "best" Alternative C is still 53% motorized. The data in the DEIS (Table 3-3) shows only 1.6% of users of Custer National Forest identify OHV use as their primary activity.
394-10	Finally we must state our deep concern that there is no explanation in the DEIS for how the Forest chose Alternative B in spite of the clear evidence in the DEIS that Alternative C is better for the resources, and is more consistent with the data on user preference. We believe that such an explanation is required.
413-4	To me, your own findings of the eleven significant issues you identify suggest to me Alternative C is a better choice than Alternative B, your preferred alternative. Then why choose Alternative B?
416-1	I do not believe the Preferred Alternative B represents responsible forest management for the Pryor Mountains. The difficulty begins with the inadequate range of Alternatives that was analyzed in the DEIS. The Forest compromised between a moderate Alternative C and a radical Alternative A. This perception is supported by numerous statistics in the DEIS. I will only cite here the Forest’s characterization of Alternative C as “half... in motorized settings”. The other alternatives are even more motorized.
416-2	It is very puzzling that in spite of repeated evidence in the DEIS that Alternative C is better, Alternative B was chosen as the Preferred Alternative - and no reason was given. It makes one wonder what the hidden agenda is. Explanations for the unsupported choice of Alternative B have included references to unspecified “trade offs”. The public needs to be told what the “trade offs” are so we can comment on them. They are not in the DEIS....None of the issues analyzed

Subject: Miscellaneous		Response #: MISC-31, Rationale for Preferred Alternative
		support the choice of Alternative B over Alternative C. I and I suspect the wildlife, consider the fact that Alternative C has 40% more core wildlife habitat than Alternative B (approximately 8000 acres more), and nearly twice that of Alternative A to be quite significant. How can the Forest not consider this difference significant enough to strongly influence the choice of Preferred Alternative?...Isn't it the task of the DEIS and public comments to help determine which alternative is better or best. The public (and the DEIS) should not be required to show why an alternative chosen, for unstated reasons, must not be chosen.
425-4		Overall it appears that your own analysis supports Alternative C as the Preferred Alternative. Why then propose that Alternative B is the Preferred Alternative?
425-20		If disparate agencies-state and Federal-- see that motorized issues are increasingly a problem, why do you prefer Alternative B when Alternative C "provides the most protection for resources on public lands (page3-17.)
425-21		How much value did you place on the results of those meetings when you wrote the Alternatives? If there were no substantive points of agreement, how did you formulate Alternatives, particularly Alternative B and how do you expect to arrive at any substantive agreement?
483-7		Finally we must state our deep concern that there is no explanation in the DEIS for how the Forest chose Alternative B in spite of the clear evidence in the DEIS that Alternative C is better for the resources, and is more consistent with the data on user preference. We believe that such an explanation is required.
Summary of Comments: Why is Alternative B your preferred alternative?		
Response: The Forest Service is required to consider more than just impacts to natural resources. Consideration must also be given to recreational/social issues. Alternative B was identified in the DEIS, and Alternative B Modified in the FEIS, based on information from the analysis which indicated they would provide a wide range of recreation access opportunities, while still providing for the sustainability of natural and cultural resources in the project area.		

Subject: Miscellaneous		Response #: MISC-32, Planning Horizon
Letter-Comment #: 124-6		The ten year planning horizon of the proposed plan does not appear to be realistic. We believe 20 years should be the term of the plan.
129-1		A ten year planning horizon is simply unrealistic. The 1987 Travel Plan has been in effect for twenty years and counting. The first assumption should be that the new travel plan will be in effect for just as long. In any case impacts on ecosystems and landscapes last for far longer than ten years. Responsible land management planning must have a much longer vision.
421-21		The number of user's are climbing each year, yet there is no plans, nor any plan of action to accommodate the number of users, both motorized and not motorized.
425-1		YVAS chapter members disagreement with this Travel Plan begins with this question: Why has it taken twenty-years for you to formulate district wide travel planning? On page 1-2 you say in 1.2, "District-wide travel planning was last addressed in 1987"; then on page 3-1 you say, "For temporal scope, a ten year time frame for project implementation is used."
425-25		This notion that something can be fixed or that the original ecosystem can be restored in the next ten year "Plan", is extremely short sighted and is one of the basic if not the basic fault of this Travel Plan DEIS.
Response: First, this planning effort is not intended to result in a specific, long-term plan such as the 1987 Travel Management Plan. Rather, the 2005 Travel Management Rule sets the stage for modifying motorized travel designations annually by requiring that new maps be printed every year that reflect any route changes identified since the last printing. There is no plan to revisit travel management planning on a District-wide scale again, rather adjustments would be made annually. A 10-year time was selected for analyzing effects of the proposed changes based in part on the above information. In addition, the interdisciplinary team recognized that motorized use and equipment has changed significantly in the past 10-years. This suggests that it may change substantially over the next 10 years. The interdisciplinary team determined that the reliability of assessing effects beyond 10 years was questionable given this information.		

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Subject: Miscellaneous		Response #: MISC-33, Route #2013 (Graham) & #2850 (Stockman Trail)
Letter-Comment #: 129-16	The map of Alternative C in the DEIS has an error showing both Graham Trail (#2013) and Stockman Trail (#2850) as open to motorized use. Only one of these should be open. Table C-3 in the DEIS shows only one of them open.	
425-18	The map for alternative C shows both Graham Trail (#2013) and Stockman Trail (#2085) open for motorized use. However Appendix C: Alternative Details by Route (page 26) indicates only one of these two is open to motorized travel in Alternative C. We do not want both of these parallel roads to the same place "open." We have no strong commitment to which one of the two routes is motorized. The Forest's choice of Stockman Trail in Alternative B is acceptable.	
Response: Both routes were included in Alternative C based on the alternative suggested by the Pryors Coalition and commenters supporting the Coalition's alternative. Table C-3 and the Alternative C map in the DEIS are accurate. The table reflects the <i>actions</i> associated with Alternative C. Because Graham Trail and Stockman Trail are already system roads, there are no actions necessary to make them system roads, and therefore they do not appear in Table C-3.		

Subject: Miscellaneous		Response #: MISC-34, Route #2850, 2850B, & 2013
Letter-Comment #: 68-30	I recommend keeping both Graham and Stockman Trails open. Graham Trail is the preferred route up the mountain from the southwest corner. This road has fewer limestone steps than Stockman Trail and is easier on SUVs and trucks.	
97-4	Route #2013, #2850 and 2850b are needed to disperse motorized use, these routes are existing, and have existed for years, they need to be allowed for different routes as they each have their own character and experience, just like hiking on a different ridge going to the same peak gives.	
132-5	Route 2013, 2850 and 2850B should be left open to keep each of these trails from being over crowded.	
Response: Roads #2850 and #2013 are both identified as open for public motorized use in Alternative B Modified. Route #2850B is a .75 mile long cut-off that parallels another route for its entire length. This route is not likely to contribute meaningfully to distributing motorized use, and was not proposed to be designated for public motorized use in Alternative B Modified.		

Subject: Miscellaneous		Response #: MISC-35, Dispersed Vehicle Camping
Letter-Comment #: 40-20	It would be helpful and appropriate to identify and designate camping sites that avoid sensitive areas, and/or to encourage camping or concentrated public use in areas that are more resilient and can more easily recover from impacts and/or accommodate public use with less impacts.	
66-46	In general there is a very high demand for camp sites and especially dispersed camp sites. If a dispersed camp site is closed, then we request that the closure be mitigated by creation of new camp sites on at least a 1:1 basis in order to avoid a significant cumulative effect on the public of too few camp sites.	
68-50	In summary, except for the pillage of archeological sites, I am not alarmed about the 600 foot swath for dispersed vehicle camping in the Pryors; however, the potential for damage exists. If the Forest Service stays with the 300 feet on either side of the road rule, then there is an obligation to patrol roads in the Pryors with the thought of closing dispersed campsites before they become trashed. Well, dispersed campsites should be patrolled anyway.	
129-21	We do have concerns about where vehicles are driven and parked by campers. The impacts of such driving and parking will increase as the number of users increases over the lifetime of this Travel Plan. Much of the vegetation and soil of the Pryors is fragile – including cryptobiotic soils and cushion plant communities. In some situations recovery from damage caused by the passage of a single 4WD vehicle could take several decades. For this reason we are concerned about the blanket application of the “300-foot rule” to all motorized routes. In principle this means that a 600-foot-wide corridor along every road -- over 72 acres per mile of road -- is vulnerable to vehicle damage. This “300-foot rule” also significantly increases the area susceptible to introduction of noxious weeds. Generally, most people would not be greatly inconvenienced by parking their vehicle beside the road and carrying their sleeping bag etc. a short 300 feet. Of course they could camp only 100 ft from the road, or alternatively carry their gear 600 feet, without being tempted to drive all the way. The Pryors Coalition 11 There may be places and routes in the Pryors where driving 300 feet to camp will not cause inordinate damage. We note	

Subject: Miscellaneous	Response #: MISC-35, Dispersed Vehicle Camping
	that the 2005 Travel Management Rule says that “The Department expects the Forest Service to apply this provision sparingly...” and “within a specified distance of certain designated routes...”(page 68284) The universal application of the 300-foot rule to all routes in the Pryors seems to conflict with this directive. The Forest should determine criteria for where such vehicle camping is appropriate. Then those “certain designated” routes, areas and/or spots where the 300-foot rule is appropriate can be implemented and it can be implemented. Unless and until this determination is made, based on scientific criteria, vehicles should be required to park beside the road. Dispersed camping can still be allowed at any distance from any road.
152-4	I would encourage you to limit dispersed camping along Rock Creek. Some of these heavily used areas are devoid of native vegetation and as such are erosive.
163-7	The 300 foot rule for dispersed camping should be changed to minimize damage to fragile resources such as soil, cultural resources and vegetation. Vehicles should only be allowed to drive and park 30 feet off the designated roads and motorized trails. Campers can then walk to their dispersed camp.
242-3	ATVs should not be allowed off roads except in very restricted camping areas. Again, not restricting off road use will result in permanent off-road scars, and unnecessarily harm plants and animals.
307-9	Allowing motorized vehicles to travel 300 feet to either side of every road universally is unwise, and application of this rule should be on a route-by-route basis, taking into consideration the topography and resources along the route.
307-15	Dispersed camping on Rock Creek and West Fork of Rock Creek. Both areas should be closed to dispersed camping to allow these heavily used areas to recover.
385-2	I strongly urge you to allow vehicles to go no more than 100 feet off the roadway to camp.
386-8	Of greatest concern in the Rock Creek valley (south of the designated campgrounds) is the impact of dispersed camping. Alt. B proposes to eliminate most dispersed sites, but not all of them. It would be realistically enforceable and better for the resource if the entire area were off limits to dispersed camping. Likewise, the West Fork of Rock Cr. has some dispersed camping that impacts the river banks, and will have some restrictions under Alt. B. But reducing or eliminating in main fork Rock Cr. will increase the pressure in the West Fork, so both need to have no dispersed camping allowed to protect the land and water.
386-24	Be much more conservative with the "300 foot rule" where dispersed camping is allowed. It essentially allows drivers to be off road along legal roads, thereby impacting a 600' corridor for miles and miles. This is unacceptable, especially at higher elevations, in more sensitive terrain. The CNF has legal discretion to curtail driving to dispersed camping where the impact is too severe. The high impact can quickly ruin the resources in popular and sensitive areas and must be addressed.
394-5	Another issue of concern to us is the 300-foot dispersed vehicle camping rule. This may be appropriate on some routes, if tightly monitored and enforced. But the universal application to all routes in the Pryors seems to be asking for trouble with resource damage, and is contrary to the intent stated in the 2005 Travel Management Rule.
406-3	No blanket drive in dispersed road side camping should be allowed. CNF should instead, designate dispersed camping spots (with limitations) where conditions are appropriate. A short spur road to some of these locations would be acceptable. Otherwise, I think a rule of one vehicle and trailer length (only while in use) permitting vehicle parking (not camping) from any road edge where conditions accommodate, would be appropriate. Hand/Animal carrying of a camp from these parking points to legal remote camp locations (the F.S. should pick the minimum distance from roads and length of stay), should be acceptable. We don't want to turn the forest roads into Drive-by Campgrounds!
425-22	If alternative C does not become the Preferred Alternative then it is essential to modify Alternative B in order for it to be acceptable to us based on the reasons provided here and with the following listed important changes to make Alternative B acceptable....The 300 foot "dispersed vehicle camping" rule should not be applied universally to all motorized routes in the all units of the Custer National Forest to prevent the spread of noxious weeds and prevent creation of new roads and trails to those off road campsites. In effect this rule arbitrarily "widens" roads to the detriment of the resource.
445-2	I am also concerned about dispersed camping in the main fork and the west fork of Rock Creek.

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Subject: Miscellaneous	Response #: MISC-35, Dispersed Vehicle Camping
	While the plan calls for some cuts in legal areas, it t=is too little
461-5	With regard to the dispersed camping exemption found in 36 CFR 212.51(b), the Travel Management Rule as published in the Federal Register states: “The Department expects the Forest Service to apply this provision sparingly, on a local or State-wide basis, to avoid undermining the purposes of the final rule and to promote consistency in implementation” (68285 FR Vol. 20 No.216).....The preferred alternative would allow the Dispersed Camping exemption for all but two routes: “This alternative allows for off-route travel to access dispersed campsites up to 300 feet off of designated routes except along system road #2421 (Main Fork of Rock Creek) and system road #2071 (West Fork of Rock Creek)” (DEIS p. 3-33).” This cannot be considered “sparingly” applied, nor designated route by route. Any preferred alternative needs to have the Dispersed Camping exemption applied sparingly, with route-by-route analysis that takes a hard look at potential impacts to each resource identified in the DEIS – Affected Environment chapter.
461-35	In addition, the DEIS did not analyze the impacts to soil productivity in relation to the broad use of the Dispersed Camping exemption, which allows for use within 300 ft of a road or motorized trail, potentially creating a 600 ft impact corridor along each route. We would like to see a map illustrating this impact zone in relation to soil types and erosion rankings.
467-30	The preferred alternative would allow the Dispersed OHV Drive-In Camping exemption for all but two routes: "This alternative allows for off-route travel to access dispersed campsites up to 300 feet off of designated routes except along system road #2421 (Main Fork of Rock Creek) and system road #2071 (West Fork of Rock Creek)" (p.3-33). This is not "sparingly" nor designated route by route. The decision to allow such a blanket exemption is in violation of the travel management rule and executive orders and was made arbitrarily.
Summary of Comments: Commenters are concerned with the 300’ dispersed vehicle camping and the impacts it may have on the resources.	
<p>Response: In a June 30, 2006 letter, the Regional Forester of Region One provided Forest Supervisors with the following guidance: “In Montana and the Dakotas the “tri-state decision” established 300 feet as a standard for travel off route for dispersed camping. Forest and grassland supervisors should continue to use that as a starting point...Forest and grassland supervisors may consider alternatives where there is a need to do so, but are not to exceed 300 feet in their designations of travel off route for dispersed camping.” The letter also states that, “Supervisors will follow national direction and apply this provision sparingly and on a route by route basis.”</p> <p>The Forest has allowed dispersed vehicle camping within 300 feet of motorized routes since 2001, consistent with the 2001 Tri-State OHV Decision. Effects from dispersed vehicle camping have been observed at site-specific locations and not widespread along the District’s motorized routes.</p> <p>The Forest used the existing 300 foot dispersed vehicle camping standard as the starting point and considered alternatives to this standard where there was a need to do so. Alternatives B and B Modified specifically address where there have been resource issues with allowing 300 foot dispersed vehicle camping, and proposes measures to address these issues. In addition, the DEIS and FEIS evaluated the effects of continuing current District-wide dispersed vehicle camping (Alternative A) and eliminating it (Alternative C).</p> <p>Current policy states “Motorized wheeled cross-country travel for camping would be permissible within 300 feet of roads and trails by the most direct route after site selection by non-motorized means.” (Bosworth, 2001). Only after a camp site is chosen by non-motorized means can a vehicle be driven to the camp site and only if it’s within 300 feet of road. This has to be by the most direct route possible.</p> <p>Impacts to vegetation are analyzed in DEIS and bolstered in the FEIS Vegetation section by assessing the magnitude of likely camp areas through the use of analyzing areas of 0 to 4% slopes in high, moderate, and low risk areas based on resistance and resilience of vegetation. In the preferred alternative, for example, there will be a slight increase for potential impacts in high risk areas. The effects analysis indicates that small portions of the 600 foot corridor would be impacted, not the entire 600 foot corridor.</p> <p>In addition, effects to soils from dispersed camping were analyzed. A map with the hazard classes is available in the soils specialist report (project file).</p> <p>The season of use outlined in Alternatives B, C, and B Modified considers minimizing effects during spring thaw when</p>	

Subject: Miscellaneous	Response #: MISC-35, Dispersed Vehicle Camping
<p>impacts to vegetation and soil are most vulnerable.</p> <p>Along the Main Fork Rock Creek road, the goal is to continue to provide dispersed vehicle camping while not allowing further dispersed site establishment. Current use has been evaluated and is generally acceptable. Water quality, cultural, and aesthetic resource concerns exist with expansion of dispersed vehicle camping site establishment and recurring use. Elements of Alternatives B and B Modified address these concerns.</p> <p>Under Alternative B and B Modified, access to dispersed vehicle camping would be allowed within 300 feet of all designated system roads and motorized trails on the District, except along system road #2421 Main Fork of Rock Creek. Along the Main Fork Rock Creek, dispersed vehicle camping would be allowed on or within a vehicle's length from the edge of designated spurs off system road #2421 (see Appendix D).</p> <p>Also under Alternative B and B Modified, access to dispersed vehicle camping along the West Fork Rock Creek Road #2071 would continue to be allowed within 300 feet of all designated system roads and motorized trails. However, per Forest Plan direction, there would be a 100 foot dispersed vehicle camping prohibition from the West Fork Rock Creek live streams.</p>	

Subject: Miscellaneous	Response #: MISC-36, Separate Units
Letter-Comment #: 68-2	The Beartooth and Pryors are two different ecosystems. The climate, soils, flora and fauna are distinctly different in the Pryors as opposed to the Beartooths. By combining data from these two ecosystems the DEIS slights the Pryors.
124-9	All merged data should be split out and clearly labeled as relating to either the Beartooth unit or the Pryor unit.
129-5	Yet far too many times in the DEIS, data from the Pryors unit and the Beartooths unit are added together and averaged in some way. Since the total area of the Pryors is much smaller than that of the Beartooths this procedure greatly obscures and skews the serious impacts of the various alternatives on the Pryors. This is not an acceptable basis for making critical decisions about the Pryors.
136-2	I am concerned that the DEIS attempts to deal with travel management in both the Beartooths and the Pryors in the same document, making no attempt to clearly differentiate between the two. Both have distinct needs.
161-3	The "PUBLIC" deserves that the Pryor Mountain Unit, be analyzed and disclosed separately....combining of the Pryors and the Beartooths, in the discussion and presentation of the impacts and effects on the various resources, results in a confusing base from which to make valid decisions.
Summary of Comments: The Beartooth and Pryor unit data needs to be separated.	
Response: Where appropriate and meaningful, more of the resource analyses effects in the FEIS have been shown by land unit in addition to displaying effects for the entire District.	

Subject: Miscellaneous	Response #: MISC-37, Route #2095
Letter-Comment #: 155-16	Routes 2095 and 20952 for closure to the public and to be used for administrative use only (page C-15) of the DEIS. I have been informed by team members that there are cultural considerations on this portion of road. It would seem the team did not consider means on how to mitigate any foreseeable problems and rather opted for closing it to public use.
381-1	I mostly support Plan B but I would like you to rethink closing of trail 2095. Many times the trail up Stockman to the Bainbridge is blocked by snow, ice, and steepness. You know the place, just past the 2095 junction. If 2095 is left open, then vehicles can do the loop. It is a much more user friendly road. I also know that a rancher leaves his equipment behind a fenced in section along that road so I suspect that his interests are driving the decision. But, restricting access to the top via 2850 is not in the best interests of the public. So leave 2095 alone.
438-11	Recommendation made under Alternative B concerning Routes 2095 and 20952 for closure to the public and to be used for administrative use only (page C-15) of the DEIS. I have been informed by team members that there are cultural considerations on this portion of road. It would seem the team did not consider means on how to mitigate any foreseeable problems and rather opted for

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Subject: Miscellaneous	Response #: MISC-37, Route #2095
closing it to the public use.	
<p>Response: The Forest Service considered additional options for designating road #2095 for public motorized use. Ultimately, concerns regarding heritage resources led the Responsible Official to decide to identify the route for administrative use only in Alternative B Modified. The route is needed for administrative purposes.</p>	

Subject: Miscellaneous	Response #: MISC-38, Route #21415
Letter-Comment #: 367-1	The Montana Department of Natural Resources and Conservation (DNRC) Southern Land Office respectfully requests Road# 21415, as shown in Alternative A in Section 12-T7S-R18E, be open to highway vehicles only - yearlong, the same designation as Road# 2141. This road would provide vitally important legal access to the State's 5,610-acre block of School Trust land in Sections 3, 5, 6, 7, 8, 9, 10, 11, 12-T7S-R19E and Sections 7-T7S-R20 in Carbon County. Currently, the DNRC does not have legal motorized access to this block of ownership. Allowing motorized access on this road to the west section line of Section 7-T7S-R19E would enable our agency access to actively manage its natural resource, provide for fire suppression activities, and provide recreational opportunities for the public.
<p>Response: The Forest has worked with the State of Montana Department of Natural Resources and Conservation (DNRC) to identify access through National Forest System lands to the subject State land sections. DNRC and the Forest have agreed to propose converting non-system route #21415 to a system road for administrative use only contingent upon mitigating water quality and fisheries concerns with the existing route.</p>	

Subject: Miscellaneous	Response #: MISC-39, Route #2093
Letter-Comment #: 129-13	Route #2093 on Island Ridge is a 1.5-mile road to nowhere for motorized users. Yet it means that hikers and horse people wanting to take the nice day hike to the end of Island Ridge will have to compete with ATVs, and their damaged trails, for the first mile and a half. Again hikers lose a lot and OHV folk gain very little. In 2004 the Forest proposed this route for “yearlong restriction” allowing no motorized use to “reduce road maintenance cost, prevent damage to vegetation, and prevent soil erosion.” What changed in three years?
<p>Response: The Forest Service reviewed route rationale used in 2004 Proposed Action for road #2093 in developing the DEIS. Concerns listed in the rationale in the proposed action for this route did not reflect the actual field conditions. Consequently, the Forest Service determined that it was appropriate to consider the route for public motorized use.</p>	

Subject: Miscellaneous	Response #: MISC-40, Route #20972 (Roberts Bench)
Letter-Comment #: 129-14	Robert’s Bench route #20972 is a 1.2-mile dead end road providing great temptation for OHVs to wander farther. If motorized it will significantly increase enforcement problems and be a significant loss to hikers looking for an easy hike. In 2004 the Forest identified this route as “unneeded” and proposed it for “yearlong restriction” allowing no motorized use to “reduce road maintenance cost, prevent damage to vegetation, and prevent soil erosion.” What changed in three years?
461-28	Within the Pryor Unit, why is seasonal use of 20972 allowed when it provides access to a remote area of the unit and exposes a traditional cultural property (TCP) to potential vandalism? As admitted in the DEIS, “including this route could lead to the loss of this irreplaceable cultural resource.” (DEIS p. 3-64). This is an unacceptable consequence and this route should be closed.
<p>Response: The Forest Service reviewed route rationale used in the 2004 Proposed Action for Roberts Bench (#20972) in developing the DEIS. The team determined that the concerns listed in the rationale in the proposed action for this route did not reflect the actual field conditions. Consequently, the Forest Service determined that it was appropriate to consider the route for public motorized use.</p> <p>The Forest Service considered additional information and concerns related to Roberts Bench (#20972) in developing Alternative B Modified. A fence currently crosses the route ½ mile from its beginning. In addition, heritage concerns have been identified with use of the route. Consequently, the first ½ mile of Roberts Bench would be designated for public motorized use, but the remainder of the route would not.</p>	

Subject: Miscellaneous		Response #: MISC-41, Route #2140
Letter-Comment #: 482-5	Picket Pin road should not be restricted as the Gallatin plan hasn't been approved and will be litigated therefore there are no restrictions on the road. Picket Pin road is a good example of lack of maintenance, as the only maintenance conducted on the road is by an exploration company as a condition of their approval to operate.	
Response: The Gallatin National Forest made a decision on travel management planning in December 2006 and has begun to implement their plan. After further review and coordination with the Gallatin, the Forest has determined that there does not appear to be a need to limit the season of use on Picket Pin Road (#2140) on the Custer National Forest. The resource concerns are limited to the Gallatin National Forest, and their season of use restriction would be sufficient to address their concerns. Alternative B Modified reflects this information.		

Subject: Miscellaneous		Response #: MISC-42, Correction 1
Letter-Comment #: 129-25	Important Note: The percentages in Table 3-8 are calculated incorrectly from the data in Table 3-16. The incorrect values greatly underestimate the impact of Alternative B on non-motorized recreation.	
Response: Thank you for identifying this error. The table has been corrected in the FEIS.		

Subject: Miscellaneous		Response #: MISC-43, Non-Motorized Trails
Letter-Comment #: 124-14	Similarly, there are duplicative and parallel roads in the Stockman trail area. One needs to be designated and the rest closed or designated for horses and pedestrians.	
129-12	There are no designated non-motorized trails up the south or west slopes of Big Pryor Mountain.	
129-20	The Pryors Coalition is particularly concerned about the total dominance of motorized routes up the south and west slopes of Big Pryor Mountain in the Forest's Preferred Alternative B. It is a bit difficult to know how to count the spaghetti of roads, but there are about eight motorized routes up Big Pryor Mountain. Yet there are NO designated non-motorized routes on which horse riders, mountain bikers, and hikers can safely and peacefully go up Big Pryor away from the motorized commotion. This extreme imbalance threatens to make Big Pryor exclusively a motor sport park. This is inappropriate given the DEIS data showing OHV users are a small minority of users – and will continue to be in the future. ...The clear solution to the above problems is to designate at least half of the trails up the south and west slopes of Big Pryor Mountain as non-motorized. We recommend that these non-motorized routes include the Inferno Canyon route #2018, King Trail #2011, and Bear Canyon route #2492, including Bear Canyon Ridge route #2814.	
163-8	Finally, the maze of eight or nine parallel routes up the west and southwest face of Big Pryor needs to be re-considered. There's no reason for so many parallel motorized routes. Designate at least four or five of them non-motorized trails for horses, hikers and mountain bikers. Follow the recommendations of the Pryors Coalition regarding specific routes. Close Bear Canyon Road #2492 at the Forest Boundary. Route #2088 should be closed to protect resources and provide a quiet area NW from Crater Ice Cave.	
345-5	Close to vehicle traffic at least half of the four roads now streaming down the Southwest Slope (#2496, #2850 (to the junction with #2496), #2018, #2011). Convert those closures to non-motorized hiking trails. There are none in that area now. Additional redundant motorized routes to the high country include four that ascend to Stockman Trail: #2012, #2850, #2492 or #2814. Close all but one to vehicle traffic; convert the others to non-motorized trails. Close to vehicle traffic two dead-end roads and dedicate them to foot traffic; #2093 (on Island Ridge) and #20972 (Robert's Bench). These roads are dead-end only for vehicles; other users can use them for additional jumping-off points. Kudos to the Custer National Forest for proposing to close Road #2308B (Dryhead Loop Route).	
394-2	Motorizing essentially all the trails from the low country to the high country leaves no routes (designated or undesignated) for hikers, horse riders, and mountain bikers. These users far outnumber OHV users on Custer National Forest, as on other National Forests. Your studies report the "quiet" users will continue to far outnumber OHV users in the future - unless they are excluded from the Pryors because there are no access routes that do not require competition with increasing number of ATVs. It is possible that some hikers might find cross country routes off of the motorized trails. But horse riders and mountain bikers need trails. And the overwhelming majority of hikers prefer to follow a trail rather than having to navigate through rough and	

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Subject: Miscellaneous		Response #: MISC-43, Non-Motorized Trails
	unfamiliar country.	
406-8	In light of the above, I want some roads/trails reclassified as non-motorized, especially in the Pryor Mountains; any roads considered not needed or necessary could be classified as administrative use only, pending further study. Thinking that these old roads will direct the flow of quite users; preventing further damage of multiple "user created" foot trails. To be more specific, as examples (the full list would be too lengthy), road #'s 2018, 2011, 2492, 2814, 2088, 2144, 2096, 20972 should all be non-motorized trails.	
414-4	In the Pryor Mountain Unit I note that there is only one trail designated as non motorized travel off trail and on undesignated existing routes, however it is disappointing to see that you apparently plan to maintain just one non motorized trail in the entire unit.	
414-5	This is an unacceptable conflict, especially considering the proposed near 100% motorized designation of the Pryor Mountain area. I hope you will consider maintaining some trails, especially on the southwest face of Big Pryor Mountain, as non motorized.	
417-5	In the Pryor Mountain Unit we note that there is only one trail designated as non motorized, open to hikers and horsemen. We recognize that there are opportunities for non motorized travel off trail and on undesignated existing routes, however it is disappointing to see that you apparently plan to maintain just one non motorized trail in the entire unit...We hope you will consider maintaining some trails, especially on the southwest face of Big Pryor Mountain, as non motorized.	
Summary of Comments: There is a desire to convert routes to non-motorized trails.		
Response: The Forest Service considered opportunities to change the uses of routes from non-motorized to motorized and motorized to non-motorized on the District. A limited number of routes were changed. Factors such as existing route management, Forest Plan direction, and Congressionally designated land use, along with the fact that in most all cases there was no clear evidence of a need to make this type of change to a route, led to proposals to maintain the existing motorized or non-motorized use of a route.		
The Forest Service reviewed existing routes not being proposed for motorized use for potential non-motorized trail opportunities. However, the same concerns associated with designating routes for motorized use existed with making the routes system non-motorized trails. Consequently, no routes are proposed for conversion to non-motorized system trails in Alternative B Modified. Construction of non-motorized trails is outside the scope of this project.		

Subject: Miscellaneous		Response #: MISC-44, No Action
Letter-Comment #:	The No Action Alternative is improperly described and mapped in the DEIS. On page 2-9 the DEIS says: "This No Action Alternative largely reflects the set of system roads identified in the 1987 Travel Plan along with modifications that have been made to the system since 1987." However several significant roads are tabulated and mapped in the No Action Alternative which were not in the 1987 Travel Plan, and have not been officially added to the system. These include Shriver Peak route #2088 west of Shriver Point (i.e. Crater Ice Cave), route #2095A, #2814 and route #2096...Please inform me if there is documentation of the addition of any of the mentioned routes according to proper procedures. The significance of this "oversight" is that the DEIS understates the number of miles of non-system roads being added to the System in the Preferred Alternative. It also understates the increase in "motorized opportunity" and the decrease in "non-motorized opportunity" in the Preferred Alternative. (Note that this is in addition to the serious computational error in Table 3-8, page 3-17.)	
416-3		
461-9	The No Action Alternative inaccurately labels non-system routes as existing system roads; this error needs to be corrected. However some roads tabulated and mapped in the No Action Alternative were not in the 1987 Travel Plan and no records exist demonstrating that they have since been officially added to the system. Specifically, in the 1987 Travel Plan, Rd. #2088 ends at Crater Ice Cave, but the No Action Alternative shows this road extending an additional 5 miles to the west. Route 2095A does not appear in the 1987 Travel plan, but it is currently in the No Action Alternative. Finally, the 1987 Travel Plan does not include the approximately 2 mile Bear Canyon Ridge #2814, but it also appears in the No Action Alternative.	
Response: The basis for the No Action Alternative is the current National Forest system roads and trails on the District. This is consistent with direction provided in the 2005 Motorized Travel Rule. The No Action Alternative does in many respects "largely reflect" the 1987 Travel Plan, but there are differences. Using the 1987 Travel Plan as a basis for no		

Subject: Miscellaneous		Response #: MISC-44, No Action
<p>action would not be consistent with the 2005 Motorized Travel Rule guidance, because it does not include all of the existing system roads and trails on the District. The routes that compose the set of set roads and trails have been incorporated into the system, and based on Forest Service knowledge they were added consistent with policy that existed at the time they were added.</p> <p>The primary issue with using the 1987 Travel Plan as the no action is that it relied upon route descriptions that are typically indistinct, and there is no accompanying map of the plan that would allow routes and route locations to be substantiated.</p>		

Subject: Miscellaneous		Response #: MISC-45, Suitable Routes
Letter-Comment #: 67-20	Each non-system route should be further analyzed and all of those that provide reasonable motorized access or recreational opportunities should be included in the final preferred alternative.	
461-17	If the resource damage is apparent on specific routes, then it should at least be qualified, if not quantified, in order to adequately analyze any already occurring and future potential impacts. This is important because trail conditions directly influence the recreation experience; hiking a rutted-out, two track trail is a very different experience than hiking a single track trail in good condition. The Forest Service uses Trail Classes for determining maintenance needs, and the DEIS should identify any trails that have resource damage. Such information is not provided in the DEIS or illustrated on any maps, and in order to properly comment and for the decision maker to make a well-informed decision, this problem needs to be corrected.	
<p>Response: An interdisciplinary process was used to identify routes suitable for public motorized use designation, including all identified non-system routes. The process included identifying natural and cultural resource concerns, recreation, access needs, and other related considerations consistent with the 2005 Motorized Travel Rule to develop Alternative B and Alternative B Modified. Route documentation is included in the Project Record.</p>		

Subject: Miscellaneous		Response #: MISC-46, Dead-End Routes
Letter-Comment #: 136-5	Also, we should consider that "dead-end" roads such as #2088 on Big Pryor and #2144 in Punchbowl (and some others) are particularly tempting to people wanting to wander off the authorized routes in their motorized vehicles. We should consider closing these routes in order to reduce their impact. These would be ways that we could plan for and respond to the practically certain impact of illegal use of OHVs as they are taken off of the authorized routes in the Pryors.	
<p>Response: For the purposes of NEPA, analyses must assume that law, regulations, and policies will be followed. Identifying where, when, and how laws, regulations, and policies may be disregarded is speculative, and not appropriate for NEPA analysis.</p> <p>The interdisciplinary team did attempt to avoid dead end routes in order to reduce unintentional route extension or route "creep". However, some dead end routes were included in the alternatives, typically because there were no significant resource issues with the route, or an administrative, utilization (including recreation), or protection need for the route had been identified.</p>		

Subject: Miscellaneous		Response #: MISC-47, 2005 Motorized Travel Rule
Letter-Comment #: 66-23	Specific references from the new National OHV Policy that must be adequately addressed include: <i>Existing – The unit or district restricts motor vehicles to “existing” routes, including user-created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use. For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management. To create a comprehensive system of travel management, the final rule consolidates regulations governing motor vehicle use in one part, 212, entitled “Travel Management.” Motor vehicles remain a legitimate recreational use of NFS lands. This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule</i>	

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Subject: Miscellaneous		Response #: MISC-47, 2005 Motorized Travel Rule
	<i>will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on National Forest System lands; address needs for access to National Forest System lands; and preserve areas of opportunity on each National Forest for nonmotorized travel and experiences.</i>	
Response: The process for the Beartooth Ranger District Travel Management Planning effort has been conducted consistent with the 2005 Motorized Travel Rule.		

Subject: Miscellaneous		Response #: MISC-48, Cost to Implement
Letter-Comment #: 67-12	Cost of initial implementation. These numbers are unreasonably high. Do these numbers reflect the fact that motorized users volunteer to maintain roads, thereby significantly reducing costs and that grants and gas tax money are available?	
Response: The costs to implement proposed travel management actions are estimates. They do not include volunteer contributions that may lower these costs because there are no formal agreements with volunteers at this time to conduct the needed work. There have been offers by <i>both</i> the motorized and non-motorized visitors to assist with this work, but because the specific scope of work, volunteer training needs, and similar items have not been identified at this time, the extent of any volunteer offset of implementation costs would be speculative.		

Subject: Miscellaneous		Response #: MISC-49, Specific Route Rationale
Letter-Comment # 68-29	I question the reason for keeping the Piney Creek trail open...It dead-ends at the limestone quarry. I recommend that the Piney Creek Trail, 2012, be permanently closed. The presence of a road will be evident for a long time into the future. On your MVUMs indicate it as a hiking or horseback trail.	
95-1	I propose you keep all of #2097B and remove that portion of #2097 that is redundant; this will allow the public to access the forest service cabin during the fall and winter months.	
97-5	Route 2085P and Route 2085R, one of these routes need to be allowed. If only one route goes to and from your threat of "potential" impact on cultural resources will be cut by 50%	
97-7	Your rationale for closing a large amount of routes is that "they do not provide desirable dispersed vehicle camping opportunity" These routes were not intended for camping but for vistas and short hikes for the "motorized experience". Some folks do not have the time, nor the want to spend days in one area.	
97-9	Route # 2085T and #2085T1, one of these routes could be closed rather than both. There are motorized users that do tent in this area and they will gladly share with hikers ect..	
132-2	Closing trails because they are not good "camping opportunities"! We like to take day rides and ride over 50 miles per day. Camping is not an issue.	
158-8	Trails 2073 and 2073E interlink trails on the north end by private land. I would like to see that open yearlong to motorized travel.	
161-11	Stockman's Trail #2850. This route provides the mainline access route from the Westside of the Mountain to the Southside. It should be retained.	
307-12	Roads 28461 and 28466 near Nye should be closed. They are dead-end roads and don't fulfill the preference of ATVs to have loop roads. They also add to the maintenance and enforcement costs for the Forest Service.	
412-5	Trails #2099, 23086, 23087, 23088, 20731A, 2092E - Closing these trails takes away a centralized motorized area. These trails offer a good diversity of terrain for families with children to take short rides on many different trails to help increase skills and increase seat time for the user. The "not desirable for dispersed camping" reason is short sighted and can be resolved by limiting camping in that specific area and not limiting the access. There are no erosion or other problems sighted that would require this area to be closed.	
412-9	Trail #2092 - Commissary Ridge - Eliminating motorized access is unnecessary on this route and takes away a heavily used access for handicapped users to view the area. The Pryor Coalition has made it clear that over a 1 mile distance is needed to create a "quiet area" desirable by some nonmotorized users. This trail is only 0.75 miles long and would not create this desired nonmotorized used area as the DEIS states as the reason for closing this trail. Also this trail is	

Subject: Miscellaneous	Response #: MISC-49, Specific Route Rationale
	the only hunting access to this side of the WRA and is highly valued for sighting and retrieving game.
420-4	Alternative Plan B lists trails 2095 and 20952 as roads closed to the public and for administrative use only. If there are cultural or other concerns existing along these trails, we would like to know specifically what these concerns are and how changes can be made to keep this important link between trails 2091 and 2850 open to OHV use. We are confused as to why trails 2073 and 2073E are listed as roads closed to the public and for administrative use only in Alternative Plan B....Do the designations of trails 2092, 20952, 2073 and 2073E fall under the normal use of administrative use only classification? If these are for administrative use only for access reasons only, are there some fairly easy remedies to make these trails available to all users?
421-36	Alternative B concerning Routes 20951, 2091T, and 20162, 2013, 2012, 2016-209144 are identified on the Alternative A map but have not been given reason for closure in the DEIS and yet do not show on the Alternative B map. We strongly suggest these trails be in the Travel Plan. We are looking for looping opportunities and the road bed is in good shape.
438-8	Recommendation made under Alternative B concerning portions of Route 2073 and all of 2073E (page C-15) of the DEIS only allows for administration use even though there is a legal means of access. Opportunity needs to be given for the public to use these roads. Game retrieval and the need for a diverse opportunity for motorized needs to be met.
438-12	Recommendations made under Alternative B concerning Routes 20951, 2091T, and 20162 are identified on the Alternative A map but have not been offered a rationale for closure in the DEIS and yet are not show on the Alternative B map. Unless meaningful rationale for closure of these routes by the interdisciplinary team can be made they should remain a part of the travel plan for the present and future enjoyment of all motorized users.
Summary of Comments: Some commenters question the specific route rationale.	
<p>Response: Specific route rationale is available in Appendix C and the project record. Non-system routes that are not proposed to be added to the system would not show up on the system and would not appear in the <i>action</i> tables in Appendix C because there would not be any action proposed. Rationale for disposition of non-system routes is contained in the project record.</p> <p>Each route was evaluated in an effort to identify resource concerns and recreation opportunities. Routes with minimal recreation value, as determined by the Forest and District recreation staff, such as short dead ends that don't contribute to a motorized loop opportunity, have no level ground for dispersed camping, and/or other similar rationale may not have been proposed for public motorized use in Alternative B or B Modified.</p> <p>Road #2012 Piney Creek: In response to public comment, this route would not be designated under Alternative B Modified. In addition, Road #2013 Graham Trail is proposed to be designated to provide a better motorized recreation opportunity than Road #2012.</p> <p>Roads #2097 and #2097B: These routes literally run side-by-side for .54 miles, with one route on either side of a fence line. Alternative B and B Modified propose to eliminate one or the other of these routes.</p> <p>Roads #2085P and #2085R: There are identified resource concerns with these routes. They are proposed for designation in Alternative A, but not proposed for designation in all other action alternatives to reduce the potential for impacts to cultural resources.</p> <p>Roads #2085T and #2085T1: Route #2085T is proposed to be designated for public motorized use in all alternatives, except Alternative C in response to the Pryors Coalition proposed alternative. After field review, Route #2085T1 is along a fence line and was created for installation of the fence. It is proposed for designation in Alternative A, but given its relatively short length (.29 miles) and limited recreation value it was not proposed for designation in any other action alternative.</p> <p>Roads #2073 and #2073E: These routes are parallel routes to 2144 and 2308. The Forest has a previous commitment to retain this route for Administrative use.</p> <p>Road #2850: All of the alternatives, except Alternative C, propose to designate all of Road #2850. Alternative C proposes to designate all but a 1.66 mile section in response to the alternative proposed by the Pryors Coalition.</p>	

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Subject: Miscellaneous	Response #: MISC-49, Specific Route Rationale
<p>Roads #28461 and #28466: No resource concerns are identified in association with these routes. They are proposed for public motorized use in all alternatives except Alternative C.</p>	
<p>Road #2092 Commissary Ridge: In response to public comment, Alternative B Modified proposes to designate all of route #2092 for public motorized use. The FEIS analyzes a range of alternatives related to this route.</p>	
<p>Route #2095: Route #2095 is recognized as providing motorized recreation opportunities. Multiple options were analyzed for addressing the heritage concerns, which include artifact displacement, site compaction, and vandalism that is most likely accelerated with motorized use of 2095. However, it was determined that identifying the route for administrative use only in Alternative B Modified was the most practical alternative at this time to protect the cultural resources given the large size of the site and the large expense that would be involved to adequately mitigate effects of public motorized use. These options, such as re-routing the road, are outside the scope of this action, but could be considered outside of this process.</p>	
<p>Non-system routes #20951, #2091T, and #20162 all had cultural resource concerns associated with them. They are proposed for designation in Alternative A, but not in any of the other action alternatives.</p>	
<p>Rationale for not proposing to designate road #2016 in Alternative B was provided in Appendix C of the DEIS.</p>	
<p>The only access to 20952 is via 2095. In Alternative A, both are proposed to be designated. In all of the other action alternatives, 2095 is not proposed to be designated due to cultural resource concerns (it would be available for administrative use). Consequently, there would be no motorized access to 20952, so it is not proposed to be designated in those alternatives.</p>	
<p>Route #2099 is proposed to be designated in Alternative A, however it is not proposed in all other action alternatives. This is primarily because the interdisciplinary team could not identify an administrative, utilization (recreation), or protection need for this dead end route. Rationale was provided in Appendix C for this action.</p>	
<p>Routes #23086, #23087, #23088, #2092, and #20731A are proposed to be designated in Alternative A, however they are not proposed in all other action alternatives. This is primarily because the interdisciplinary team could not identify an administrative, utilization (recreation), or protection need for these relatively short, parallel routes. Rationale was provided in Appendix C for these actions related to #23086, #23087, #23088, and #2092E; rationale for #20731A is in the project record.</p>	
<p>There is no route #209144.</p>	

Subject: Miscellaneous	Response #: MISC-50, Visitor Use
Letter-Comment #: 418-4	The Travel Plan should, first and foremost, protect the health of the Pryors using best management practices...It's time to acknowledge the concept of carrying capacity and integrate it into decisions on motorized recreation.
418-5	Resource allocations for Recreation use should reflect demographics and data shown in the DEIS Economics/Recreation section...Do not turn unauthorized, user created roads/trails into system roads thereby rewarding unauthorized actions.
<p>Response: The Custer National Forest and National Grasslands Land and Resource Management Plan was developed through the long-term resource management planning efforts required by the National Forest Management Act, as amended. This very public process set the goals, objectives, forest-wide and management area standards for the Forest and provides the basis for management of the Forest's resources. Site-specific efforts such as travel management planning address a component of Forest management, but are not intended to be the more comprehensive planning effort associated with Forest-level land management planning. Site-specific efforts like travel management planning must be consistent with the Forest Plan.</p> <p>The Regional Forester, in the Record of Decision for the Forest Plan, acknowledged the multiple-use challenges the Forest confronts, back when the Plan was signed, as well as today: “The Forest Service vision of the Custer National Forest is of a Forest managed to benefit the public in harmony</p>	

Subject: Miscellaneous	Response #: MISC-50, Visitor Use
<p>with the natural environment. Management direction responds to interested parties, to the effects on peoples lives and to the capability of the land.”</p> <p>And in the Rationale for selecting the Forest Plan in the Record of Decision, the Regional Forester noted: “No single factor or individual consideration constitutes the total rationale for my decision. Instead, it was the consideration of many factors and their interrelationships,…”</p> <p>...“In making this decision, I recognize the limitations of the physical and biological systems, and that the Custer National Forest cannot satisfy every individual or group. (ROD, page 13.)</p> <p>Further in the Record of Decision, the Regional Forester in summarizing the reasons for regarding the selection of the Forest Plan, notes: “I believe the Plan provides a management strategy for the Forest that maximizes net public benefit. This is achieved by providing a balance among commodity outputs, thus providing for a reasonable level of local employment while protecting amenity values such as wildlife, fish, scenic quality, and diverse recreation opportunities that are important to area residents. The Forest provides a variety of recreation activities that benefit nearby communities indirectly but the Forest has little control over the total benefits to these areas. Management is within the physical and biological capability of the land.</p> <p>One of the decisions made in the Record of Decision for the Forest Plan was the allocation of areas to allow for certain types of activities. Forest Plan Management Areas in the analysis area, the Beartooth Ranger District, are B, C, D, E, F, G, H, I, L, M, P, Q, R, and T. Of these, Management Areas H (recommended wilderness), I (Wilderness), and L (Research Natural Areas) generally prohibit roads and trails in them. The other management areas allow/provide for motorized travel within them.</p> <p>One of the purposes of the 2005 Motorized Travel Rule is to identify the minimum motorized transportation system needed for the long-term land and resource management and administration of the national forests and grasslands. To comply with the 2005 Motorized Travel Management Rule, the interdisciplinary team went through the original proposed action to determine if each of the proposed actions was reasonable and still desirable, and supplemented rationale for the original proposed actions where appropriate. (FEIS, Proposed Action description).</p>	

Subject: Miscellaneous	Response #: MISC-51, Trends
Letter-Comment #: 67-13	The same analysis must be done for the Custer National Forest and it will find the same no growth trend and a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth.
Response: The Recreation section of the DEIS and FEIS identifies local, state, and regional trends in recreation use. The State of Montana Fish, Wildlife, and Parks information that was used was based upon OHV registration. This information was used to determine the effects of the proposed travel management changes on recreation opportunities and the responsiveness of the alternatives to the identified trends in recreation.	

Subject: Miscellaneous	Response #: MISC-52, Route Construction
Letter-Comment #: 66-156	Identify any reroutes that are part of the travel plan proposal because the reroutes are often of lesser quality and the reduction in quality needs to be mitigated.
Response: The commenter has not defined what is meant by a re-route, but it is assumed to mean a route constructed as an alternative to a route this is not going to be designated for public motorized use. Route construction is outside the scope of this analysis.	

Subject: Miscellaneous	Response #: MISC-53, Correction 2
Letter-Comment #: 129-29	Note there is apparently a typographical error in table 3-54. The number 7,808 acres susceptible to weed infestation in alternative C in that table contradicts the number 2,211 which appears in tables 3-52 and 3-55 and elsewhere in the text.
Response: Thanks for your letting us know about the mistake in Table 3-53. It has been corrected.	

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Subject: Miscellaneous		Response #: MISC-54, Agency Policy
Letter-Comment #: 66-125	The concept of area closure is not consistent with Forest Service regulations as established by appeals to the Stanislaus National Forest Travel Management Plan (http://www.fs.fed.us/r5/ecoplan/appeals/1998/fy98_stanislaus.htm). We request that the findings of that appeal including the following excerpts be included in this evaluation...	
Response: The agency policy relied upon for this ruling has been replaced by the 2005 Motorized Travel Rule. Under the Rule, routes designated for public motorized use are to be identified on the Motor Vehicle Use Map. There is no further requirement for posting of open or closed routes in the Rule.		

Subject: Miscellaneous		Response #: MISC-55, Motorized Trail Opportunity
Letter-Comment #: 66-130	We request evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden and the formulation of a preferred alternative to address that issue.	
421-50	In the Pryor's, all roads & trails should be non-system trails meaning dual uses based on the 2005 Travel Management system. This would allow non-licensed drivers to ride them with their families except for trail #'s 2308 & 2085, these two should have trails running adjacent to them for non-licensed drivers.	
Response: The District currently has eight miles of routes, involving three trails, available for unlicensed OHV use in the No Action Alternative. Two of the trails could be construed to provide a "continuous" opportunity. Alternatives A, B, and B Modified would provide many more miles of opportunities for unlicensed OHVs, and attempted to provide continuous opportunities by providing loops for unlicensed OHV use. Alternative C is intended to place less emphasis on motorized recreation opportunities and would eliminate opportunities for unlicensed OHV use. Based on the opportunities provided by the alternatives, it is not apparent that an "evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden" or "the formulation of a preferred alternative to address that issue" are warranted since multiple alternatives increase these opportunities.		
Licensed OHVs can be operated on National Forest System roads. The motorized recreation effects of changes to these routes have been disclosed in the Recreation section of Chapter 3.		

Subject: Miscellaneous		Response #: MISC-56, Alternative A
Letter-Comment #: 387-4	...a reasonable alternative and reasonable expectation that would keep routes open for all visitors. This reasonable alternative was not considered and evaluated and is most often only part of the No Action alternative which is never the preferred alternative.	
Response: Alternative A was intentionally developed to reflect the alternative described by proposing designation of all existing motorized routes except those that the Forest Service does not have a legal right-of-way to access, are already naturally revegetated, or for a limited number that were needed for administrative use only.		

Subject: Miscellaneous		Response #: MISC-57, Measurable Effects
Letter-Comment #: 387-13	Any measurable impact from OHV use is judged to be significant. OHV impacts are a small fraction of natural actions. Nature should be used as the standard for comparison of OHV impacts.	
Response: The DEIS and FEIS do not assume that any measurable effect from OHVs is a significant impact. Thresholds for determining impacts are resource specific.		

Subject: Miscellaneous		Response #: MISC-58, Increase Motorized Opportunities
Letter-Comment #: 387-23	CBU requests that an alternative be made available that increases motorized and mechanized opportunities.	
Response: Alternatives A would increase motorized and mechanized opportunities compared to the No Action Alternative. Creating additional opportunities by constructing routes is outside the scope of this analysis. (See Chapter 1 Scope of the Decision section, Chapter 2 Alternatives section, and Appendix G Actions Outside the Scope this Decision.)		

Subject: Miscellaneous		Response #: MISC-59, Route #28491
Letter-Comment #: 404-1	I feel that the opening of 28491 would cause similar damage while encouraging people to continue using the other old roads in the area.	
Response: Route #28491 was inadvertently shown as designated for public motorized use on the map displaying Alternative B. The road is currently not open to public use and there is no proposal to change this. The map will be corrected in the FEIS.		

Subject: Miscellaneous		Response #: MISC-60, Addressing Resource Concerns
Letter-Comment #: 411-12	Has the CNF looked at having a temporary restriction to let the resource issue heal its self over a 1 or 2 year time or with assistance from the public to help correct an issue?	
Response: The interdisciplinary team considered various options in Alternatives B and B Modified for addressing resource concerns, such as delaying designation until mitigation is completed, not designating routes, and season of use restrictions. In addition, the Forest Service expects to seek help from motorized and non-motorized groups that have offered to assist with mitigation work.		

Subject: Miscellaneous		Response #: MISC-61, Recreation Emphasis
Letter-Comment #: 411-35	The terms the CNF use of motorized vs. non-motorized is drawing a preconceived notion. This portrays the different users are in competition for use on the forest and this is not true.	
Response: Reference to motorized or non-motorized preferences is a generalization of the public comments received on the project. In general, a majority of the respondents could be characterized as falling into one of two groups; those that preferred emphasizing motorized recreation experiences and those that preferred to emphasize non-motorized recreation experiences. To some extent, these are competing values focused on limited resources.		

Subject: Miscellaneous		Response #: MISC-62, Correction 3
Letter-Comment #: 412-10	Trails #20162, 2091H4, 2091H3, 2091H2, 2091H1, 20911, 20913, 20912, 20161, 2091T, 20951A, 24921 - We cannot find the reasons for closing these trails in the DEIS Alternative B section that lists reasons for trail designation(or non-designation). Why are each of these trails not included as system trails for Alternative B?	
Response: The table containing the list of actions associated with Alternative B has been corrected in the FEIS to display the proposal to not designate system roads #20911, #20912, and #20913. Routes #2091H1, #2091H2, #2091H3, #2091H4, #2091T, #20161, #20162, #20951A, and #24921 are all non-system routes. They were not proposed to be converted to system roads or trails in Alternative B. Therefore, there was no action involved with these routes and they are not displayed in the table of actions associated with Alternative B. The rationale identified for not proposing to convert them to system roads is contained in the Project Record.		

Subject: Miscellaneous		Response #: MISC-63, Definition of Road and Trail
Letter-Comment #: 418-3	Definitions used in the EIS should be precise and accurate. "Road" and "trail" are not interchangeable as shown in the DEIS glossary. Please use "motorized" to modify the word "trail" to clearly demonstrate trail's intended use or better yet, more appropriately, call it a road. It is a disservice to the public to use vague and unclear terminology on such a critical issue.	
Response: The definitions used in the DEIS and FEIS are taken from the 2005 Motorized Travel Rule and Forest Service Manuals and Handbooks. The definition used for trail applies to both motorized and non-motorized trails. Throughout the DEIS and FEIS we have attempted to identify whether a subject trail is intended for motorized or non-motorized use.		

Chapter 5: Response to Comments

Subject: Miscellaneous		Response #: MISC-64, Scoping
Letter-Comment #: 461-85	In other words, the proposed action changed significantly from 2004 to 2007, yet there was no official scoping conducted on the new proposed action and the agency instead went right to publishing a DEIS. The general public did not have an opportunity to comment on the proposed action since it was not released prior to the publication of this DEIS. This is in violation of the regulations stated above.	
Response: As discussed in the DEIS, the 2004 proposed action was re-formatted to be consistent with the 2005 Motorized Travel Rule. The rationale used to develop the actions in the 2004 proposed action were reviewed to determine if they were reasonable and appropriate. A limited number of actions were dropped because conditions had changed, or the original basis for the action was not clear. These changes did not represent a significant change in the proposed actions. The public was advised of the need to re-format and update the proposed action at multiple public meetings held during the summer of 2006. The public had an opportunity comment on the alternatives during public scoping for the DEIS.		

Subject: Miscellaneous		Response #: MISC-65, Motorized Mixed Use
Letter-Comment #: 66-24	We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing.	
66-25	We request that dual-use or unrestricted width trail designation be used for all of the motorized routes except single-track trails.	
66-26	We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past.	
67-17	Dual-use routes are a very significant issue because we cannot interconnect OHV routes without them. Therefore, OHV recreationists would have a totally dysfunctional system without dual-use or they would be illegal.	
421-48	Alt. B. Custer should move more of the roads to all types of OHV's allowed or mixed use. You have 185 miles and only 27 are mixed use. This should be the more as 75% of roads mix use. This will cut down on the confusion of who can ride these trails. Only the 2308-2805 in the Pryors should be classified A hwy use. The rest is mixed uses. In the Beartooth, the only road should be Red Lodge area, East & West rosebud, Nye Road to the campground, 2846, This is all, the rest could be mixed uses, High clearance and OHV.	
Response: One of the primary considerations when determining when to propose motorized mixed use on roads or designate a route as a trail open to all OHV's is crash probability and severity. Trails are typically lower-speed routes where the risk of crash probability and severity tend to be lower. Road types vary widely and roads where the risk of crash probability and severity is high may not be suitable for motorized mixed use.		

Subject: Miscellaneous		Response #: MISC-66, Available Data
Letter-Comment #: 66-34	Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system.	
Response: The information to update the cited tables is not readily available. However, consideration of the cumulative effects of recent travel management decisions are considered and disclosed in the Recreation section of Chapter 3.		

Subject: Miscellaneous		Response #: MISC-67, Conflict
Letter-Comment #: 66-150	We request that a reasonable definition for "significant" conflict be developed and used as part of this action.	
Response: The Human Environment section of Chapter 3 discusses and evaluates user conflicts.		

Subject: Miscellaneous		Response #: MISC-68, Routes Added
Letter-Comment #: 461-12	We were especially disappointed not to see any resource maps associated with each section of the Affected Environment, or maps that show the existing system routes versus existing nonsystem routes and which of the non-system routes are being proposed for additions. Without these specific maps, it is difficult to adequately comment on the alternatives.	
Response: Non-system routes being added to the National Forest System are identified in Appendix C for each alternative. Alternative A contains the majority of existing non-system routes, except for those that the Forest Service had no legal right-of-way to access or that have naturally revegetated. In addition, the scoping document for this project contained detailed lists and maps of all system and non-system routes.		

Subject: Miscellaneous		Response #: MISC-69, Route #241410
Letter-Comment #: 67-5	"Please note that routes 241410, etc. were inadvertently left off of the map for Alternative C." The Map for Alternative C is seriously flawed and must be re-issued.	
Response: The FEIS will display these routes on the map for Alternative C.		

Subject: Miscellaneous		Response #: MISC-70, Minimizing Effects
Letter-Comment #: 127-7	It would be helpful to also include in the plan a description of the kinds of resource damage the plan seeks to curtail.	
Response: Appendix C provides the rationale used to propose actions aimed at minimizing effects of designation.		

Subject: Miscellaneous		Response #: MISC-71, Cumulative Effects
Letter-Comment #: 387-30	I request that your forest evaluate the past actions in your forest district and other adjacent district that have affected motorized users and ascertain an overall picture of what impact these past actions have had.	
387-32	...to address the impact that the proposed closures in the Custer will have on forest visitors from other areas of Montana. Many other forest districts have made statements that the impact of the closures they are proposing will have little affect as visitors will be able to drive a short distance to recreate in another forest.	
Response: The Recreation section of Chapter 3 addresses the cumulative effects of past, present, and reasonably foreseeable actions on motorized recreation opportunities.		

Subject: Miscellaneous		Response #: MISC-72, Non-Motorized Alternative
Letter-Comment #: 394-9	The Forest did not analyze an appropriate range of alternatives. Where is the alternative that is as "extreme" in emphasizing non-motorized use as Alternative A is in emphasizing motorized use?	
Response: Alternatives, such as those analyzed for this project, must be consistent with the long-term management goals identified in the Custer National Forest Land Management Plan. An alternative that eliminated all motorized access would not be reasonable because it would be inconsistent with the Forest's Land Management Plan.		

Subject: Miscellaneous		Response #: MISC-73, Designation Criteria
Letter-Comment #: 467-20	For each resource affected by a particular route designation, the Forest Service should determine whether the disclosed impacts are in fact consistent with the Forest Service's obligations as per the designation criteria. The listing of routes in Appendix C does not do this as it simply categorizes the route-specific actions for each Alternative; it does not screen these route-specific actions relative to the designation criteria or the Forest Service's related duty to designate only the "minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands." 36 C.F.R. § 212.5(b). That screening process must be done as part of the impacts analysis.	
Response: Proposed route designations associated with Alternatives B and B Modified were evaluated for the resources listed in the designation criteria (36 CFR 212.55). The rationale used to determine route designations is contained in the Project Record.		

NOISE

Subject: Noise		Response #: N-1, Decibel Noise Levels
Letter-Comment #: 67-19	Noise. The reference is made to a 1993 book, Sound Levels of Five Motorcycles Traveling Over Forest Trails. This data is antiquated because sound levels have been dramatically reduced by new equipment and techniques since 1993 and there are noise level restrictions in effect now.	
421-44	*93 Analysis is no longer accurate or viable. Montana has newer analyses of what is safe decibel levels. There are new laws and restrictions about what decibel levels can be emitting from OHV's in public areas.	
425-11	YVAS Chapter members are mystified that the Forest Service did not include a comparison chart of all decibel noise levels and considers the failure to include a dB rating for all motorized vehicles in the DEIS analysis as serious negligence on the part of the Custer Forest Management.	
Response: The noise section in the FEIS will be updated to reflect Montana's sound law (MCA 61-9-418) which requires a 96 decibel sound limit for motorcycles and ATVs operated off highway on public lands. Improvement of stock equipment has brought the sound level of most dirt bikes and ATVs down into the mid to low 90 decibel range.		

Subject: Noise		Response #: N-2, Quiet
Letter-Comment #: 39-2	I am for quiet and natural places in which to look at birds, plants and nature in general in the Pryor Mountains.	
142-1	PLEASE reconsider your proposal for us of the Pryors. We have more than enough motorized places to use. PLEASE reserve the Pryors for peace & quiet & beauty for those of us who treasure such qualities.	
204-2	More people want to escape the noise and commotion of daily life to the peace and quite of treasured natural landscapes.	
222-3	The noise, the smoke and all the excitement is like a motor cross race. I am against allowing them in the Pryor's for all the reasons I have listed above. The people who drive these vehicles are not senior citizens out Bird watching. Indeed, with all the noise they make, all wildlife would be long gone.	
262-2	No new roads open. Also, #2088 should not be open to public motorized use west of Crater Ice Cave. The existing main roads and trails allow visitors in and on motorized vehicles an overall experience of this unique area. The majority of visitors who wish to explore the Pryors without motorized vehicles could be directed to the quieter areas with more chance of seeing wild game and undisturbed meadows. Motorized vehicles on #2088 interfere with this quieter exploration.	
317-3	Road number 2088 should not be open to motorized traffic west of the ice caves. Opening this road exposes a huge swatch of the Pryor mountains to the noise and dust from motorized traffic.	
320-1	Alternative B does not address the fact that hikers from all over Montana enjoy the peaceful quietness of the area. Allowing motorized traffic in two-thirds of the Pryors (Alternative B) will destroy that option.	
324-2	Alternative B or even yet, - C where there seems to be a balanced land use policy. ATV'ers and people like us both to have a place in this area. There is nothing worse as a hiker or camper to have a noisy vehicles interrupt your peace and it leads to confrontations (i.e. like one we had with snowmobilers on a cross-country ski trail) so it would be better for both groups if the areas were separated.	
334-2	So many roads in the Alternative B distracts from the beauty and serenity of the area, the reasons many of us go there. Maybe some of the roads should be closed to motorized and open to hiking and horse back only; it would be nice to get away from it all and maybe hear a bird sing.	
344-1	Motorized access should be limited -- #2088 should not be open to motorized use and the Bear Canyon road #2492 should be converted to a non-motorized trail. Why? Because there are many alternative routes open to ATVs and the sound of ATVs disrupts any sense of wildness, not to mention degrading the landscape when people ride off trail.	
386-3	Especially desirable are the series of non-motorized trails near Myers Cr. and Island L., which allow an area of quiet trails recreation	
386-16	Consider leaving more land free of motorized routes to allow for some quiet recreation, less	

Subject: Noise		Response #: N-2, Quiet
	impact on the resources, much easier law enforcement, and less cost (all of which are nearly accomplished in Alt. C).	
397-3	These areas (Pryors) need to be kept natural and off limits to all motorized vehicles to protect critical wildlife habitat and to provide the quiet solitude that I and many other users seek.	
Summary of Comments: There are concerns about having quiet areas.		
Response: The Human Environment in the FEIS address impacts from noise as an annoyance. Creating new quiet zones as a management area is outside the scope of this analysis.		

Subject: Noise		Response #: N-3, Recreation Opportunity Spectrum
Letter-Comment #: 461-19	Obviously, since there are problems with how the Semi-Primitive Motorized ROS classification was determined, as explained in the section above, then the noise analysis based upon that ROS classification is suspect as well. In addition, the DEIS should have a more specific analysis that values how noise will impact non-motorized recreation opportunities outside of the Wilderness areas and IRAs. Lumping the Primitive and Semi-Primitive Non-Motorized ROS classes together obscures the fact that recreation opportunities are different between Wilderness, IRAs, and other areas. Not all recreationists have the opportunity or ability to travel into the Wilderness area or IRAs. The DEIS should recognize quiet recreation opportunities in these terms, delineating the time it takes to reach these areas from local population centers and the degree of difficulty involved with recreating there. Just stating that non-motorized recreation opportunities represent a specific percent of each alternative does not adequately illustrate these variables, and therefore the DEIS does not adequately analyze the noise impacts on non-motorized recreation opportunities.	
461-20	Finally, measuring noise impacts purely in recreational terms is problematic since noise from motorized recreation affects more than other people’s experiences. It affects wildlife as well. In fact, the DEIS provides some detail for noise and distance in relation to open or forested terrain (DEIS p.3-37), but it does not apply this data in its analysis methodology. Without adequate analysis the DEIS cannot determine the cumulative impacts from other activities. The National Park Service has planned for and modeled natural quiet in some of their units, including the Grand Canyon, Rocky Mountain National Park, Hawaii Volcanoes National Park, and Yosemite National Park. We recommend using the Park Service’s approach to measuring noise impacts. ⁵	
Response: The Recreation Opportunity Spectrum (ROS) percent by alternative used to address noise was based on the best available information. Variables of recreational access to non-motorized recreational setting within the ROS categories are difficult to impossible to predict, although it is recognized that they may exist. About 25% of the District is in semi-primitive non-motorized setting where one does not have to access the Wilderness for a non-motorized experience.		
National Park Service modeling for “natural quiet” was not used since data used in these models is not readily available. No matter how long and in what manner one collects soundscape data, there will always be a level of uncertainty because the soundscape is dynamic.		
Noise impacts to wildlife are addressed in Chapter 3, Wildlife section.		

RECREATION

Subject: Recreation		Response #: R-1, ATV and Motorcycle Trails
Letter-Comment #: 66-161	Evaluations and travel plans should differentiate between ATV and motorcycle trails.	
Response: The 2005 Motorized Travel Rule established designations for both ATV and motorcycle trails. The Forest Service considered the type of vehicle designation on a route-by-route basis and provided a range of alternatives with varied opportunities for different vehicle types. In most cases routes were identified for OHV opportunities where the route is shared by a variety of vehicle types. For detailed information about opportunities proposed in each alternative by vehicle type, please see the FEIS map set.		

Chapter 5: Response to Comments

Subject: Recreation		Response #: R-2, Non-Motorized Trails (Wilderness)
Letter-Comment #:		
7-1	I would like to see is an exception for llamas on those trails.	
9-2	If your going to shut down the backcountry to pack animals such as Llamas which are not horse or mule and leave less impact then a human. I would suggest that you don't allow humans to stay over night as well until the areas which you speck of are back to there full natural state.	
15-2	Please reconsider your travel plan to make Lake Fork of Rock Creek a Day Use ONLY Trail for those on horseback.	
17-1	Please consider temporary closures (24 mos) at specific sites. Specifically in alpine or lake areas. (ie: campsites that are overused)	
17-2	Also - consider placing a permanent high line for stock users at a stable spot on the trail before one reaches a lake site & require horse & stock users to walk the remainder of the distance to fish or picnic. (ie: Crow Lake)	
17-3	Allow Outfitters & Guides only specific "use days" and limit the size of the party.	
38-1	The trail to Crow Lake being closed to horse travel. While I do understand the concern of horses denuding the area I do worry about having to leave a live animal and gear 1/2 mile out of site and control. I also do not understand the day use only of Keyser Brown. I believe this would only increase trail travel and not resolve the issue of horse traffic at the lake.	
95-2	I would like to further your restrictions to include all of the Beartooth Wilderness off limits to all horses and stock use. Water channels have formed in these horse ruts and further exasperate the problem thus degrading the trail and contaminating our streams with unnatural sediment loads during times of snow melt and surface run-off. ... It is well documented that stock animals area the number one importer of the noxious weed seeds. ... back country camping sites that have had horse/stock use have been 'girdled' and killed by repeatedly tying the animals to them, and the off setting riparian areas are riddled with deep hoof impressions and manure.	
334-6	I have not been the last one half mile up the trail 13B to Crow Lake....Before we close off the complete trail to horses, I would hope we can construct a hitching rail or some type of tie up are for horses, part way up that trail closer to the lake. The main trail 13 is too congested to leave ones horse or horses, behind out of sight and unattended.	
334-7	Trail 2 is too long for a horse day use only, nobody wants to ride 19 miles round trip with out the chance of camping out at all, and what happens if one is caught traveling at night?....In stead of the camp over lock out, we could consider something like a permit system one camp out in the he area per family per year. Your outfitters would probably need to have a more lenient set of rules.	
386-5	Improvements that are needed in Alt. B include: Stock Use...all stock are regarded as having the same impact by the FS, despite the fact that llamas (an increasingly common pack animal) have 1/7 the impact on the land as a horse (as documented in the research). No overnight stock use will be allowed to Mystic, Island, and Princess Lakes up the W. Rosebud, on Lake Fort to Sundance Pass, (incl. Lost L., Keyser Brown, and September Morn L.) from Quinnebaugh to L. Mary, and no stock any time into Crow L. (1/2 mile), to lessen the impact to popular and sensitive areas. First, is this Travel Planning issue, or a Forest management issue? Other ways to mitigate impact would be to reduce number of stock per party (4-6 instead of the current 15); study the areas and determine what is causing the impacts before eliminating one type of user; require that all users follow Leave No Trace principles in sensitive areas; require permits for stock users in sensitive areas.	
389-1	The Absaroka-Beartooths do not lend themselves for a lot of horse use and that is why I do not believe horse use should be discontinued on some of the only limited opportunities. If every trail in the A-B wilderness was total destruction to the wilderness, the amount of area destroyed would still only amount to less than 1 percent of the total area of the wilderness. Having traveled many trails in the wilderness I know that this is not the case. Therefore I can say that all forms of recreation are impacting far less than 1 percent of the total area of the wilderness, which seems to meet the requirements of "acceptable change". I do not believe that eliminating horses on these trails will see any wilderness restored to its original state nor do I believe that allowing horses will more rapidly degrade the wilderness. These are our public lands to enjoy	

Subject: Recreation	Response #: R-2, Non-Motorized Trails (Wilderness)
	and we must remember that humans are a critical part of the environment as well. Please reconsider you plan to eliminate horse use on the aforementioned trails.
400-2	The Forest Service guidelines mandate leaving Crow Lake, Lake Fork, and the West Fork trails open to overnight and day use.
406-1	In reference to the 'day use stock restriction" used in the DEIS on several trails - what does day use really mean? I've heard talk of "trade offs, camping resource damage and etc", but no specifics. I believe CNF is using the travel plan to accomplish Forest Management Planning, which is putting the "cart before the horse." If we are "throwing things to see what sticks" with such a broad brush, I would rather see an advisory panel of volunteers study the actual problem and give recommended site specific long term sustainable solutions, than impose a near permanent (possible flawed) prohibition. The restriction on stock is at best, a delaying of an inevitable, is certainly not equitable (possibly discriminatory) and I don't believe the best solution. On the surface this restriction appears to be an attempt, to manage a user group by unpleasant surrounding circumstances. No camping-why even go, or should we go to another place?
411-1	Define day use on the stock usage on trails more accurately 1b Lake Mary, 2 Lake fork, 2 B Lost Lake, 2D Keyser Brown.
411-3	Has the Custer taken steps to mitigate the problem without closure, such as mitigation, or contacting BCH in the area to help mitigate a potential problem?
411-5	Setting up a full day camp with a tent to prepare a lunch for a group of friends with a fire, with stock tied up. This would be considered an accepted use because it is a daytime use, and this same use would not be acceptable overnight. This is a conflict of a decision.
411-6	Does the CNF have physical evidence (pictures) to show to public the undesirable impacts in these camping areas from stock?
411-7	Does the CNF have info. On the impacts of non-stock user camping in these areas.
411-8	This is a travel plan and it should concern travel on the forest. Camping should be classified as a wilderness management plan.
411-10	Which forest service personal (sic) on the ground decided these areas have problems and what time period was this info gathered?
411-11	Has the CNF shown a steady increase of resource issues over the years? Or have the resources issues remained unchanged or decreased over this time?
411-13	Crow Lake trail #13B. Does the CNF have physical evidence (pictures) to show the resource issues on this trail? Which forest personal (sic) on the ground decided these area have problems and what time period was this info gathered?
411-15	Crow Lake trail #13B. Tying stock up .58 of a mile from the lake has safety concerns.
411-18	Lake Mary. Does the CNF have physical (pictures) evidence to show the public resource issues from camping with stock? Which forest service personal (sic) on the ground decided there were resource issues and at what time period?
411-22	A camping restriction would fall under a wilderness management plan, and trying to over lap with a travel plan restriction is a conflict of interest and cannot be grouped together.
414-1	Alternative B, your preferred alternative, proposes to limit stock use on the Lake Fork trail system (Trails 1B, 2, 2B, and 2D) to "day use only". I have several concerns with this prohibition. First, it seems to me that restrictions on overnight camping would be more properly applied in a Wilderness Management Plan rather than in a Travel Management Plan.
417-3	Alternative B, your preferred alternative, proposes to limit stock use on the Lake Fork trail system (Trails 1B, 2, 2B, and 2D) to "day use only". We have several concerns with this prohibition. First, it seems to us that restrictions on overnight camping would be more properly applied in a Wilderness Management Plan rather than in a Travel Management Plan...We would be pleased to participate in an advisory group to look at the Lake Fork problem and give recommendations for other possible measures to alleviate it before a permanent prohibition to overnight horse use is imposed.
417-4	We also have concerns with the proposed closure of the Crow Lake trail, 13B, to stock use...lets look for other means to solve the problem. Perhaps appropriate stock holding areas could be identified or developed near the lake with stock users required to utilize them.
421-28	Some trails are being closed down to user groups due to damage of the trails and areas just off

Chapter 5: Response to Comments

Subject: Recreation		Response #: R-2, Non-Motorized Trails (Wilderness)
	the trails themselves, what has the Forest Service done to alleviate this damage from the horse backers in particular? What is planned to be done to mitigate the problem besides just outright closing the horse trails #2 & 2D? We can understand temporary closures of these areas (example: like camping in one area one year then moving it to another location the following year) to design a plan to mitigate the problem could be necessary. Possibly a 1/2 mile circle around these damage areas.	
421-30	Page 1-3 1.2.6 we do not see any mitigation or see any step that the FS has and should take to mitigate the problem. Like why don't you move the site for camping because the Forest Service sets specific camping sites (when you are talking about 10 miles of trail and there is no other place to camp)...Can we allow a category exemption fro this campground to contain an possible damage from camping or the horse backers?	
421-42	The majority of this area [Map 4, Area 4] is wilderness and non-motorized. All areas should be open for horseback travel.	
483-5	We encourage the Forest to consider other ways to mitigate stock impacts such as reducing the number of stock per party (perhaps 4-6 instead of the current 15); study the areas and determine what is causing the impacts before eliminating one type of user; requiring that all users follow Leave No Trace principles in sensitive areas; and requiring permits for stock users in sensitive areas.	
Summary of Comments: Proposed action related to the non-motorized trails in the Wilderness will not address the resource concerns.		
Response: Mitigation of pack and saddle stock impacts in the Lake Fork drainage and at Crow Lake by restricting pack and saddle stock to day use were proposed in the DEIS. In large part due to comments about the effectiveness of the proposed mitigation, these actions have been dropped from the analysis and will be addressed through other measures outside of this process.		
The Forest generally agrees with comments that there may be more effective and appropriate mechanisms to address the resource impacts associated with holding and using pack and saddle stock, including llamas, in the Lake Fork drainage and in the vicinity of Crow Lake Trail. Consequently, the portion of the purpose and need related to pack and saddle stock impacts contained in the DEIS has been removed from the FEIS and actions associated with "Day Use" pack and saddle stock use have been dropped in Alternative B Modified. The Forest intends to propose site-specific measures in the future to address the resource concerns in the Lake Fork drainage and near Crow Lake (see Appendix E for Opportunities List). All Special Orders currently addressing stock use in the A-B Wilderness remain in place. Finally, should adverse resource impacts arise, temporary closure orders could be implemented to help address the issue if appropriate.		

Subject: Recreation		Response #: R-3, Rock Crawling
Letter-Comment #: 227-3	There are not any rock crawling trail in the Pryor Mountains but there is a lot of potential. Every time I visit there I see lots of canyons full of rocks that would be perfect for 4x4's and there is no one hiking these canyons. Even if we could obtain special use permits for a trail and a set number of vehicles for a certain time period (week or so).	
Response: The public did not identify any specific rock crawling areas in response to scoping for this project. In addition, the IDT did not identify any areas suitable for cross-country vehicle use (see Project Record), including activities such as rock crawling, based on the guidance for assessing motorized use areas associated with the 2005 Motorized Travel Rule.		

Subject: Recreation		Response #: R-4, Looping Trail Opportunities
Letter-Comment #: 68-31	If the Forest Service closes the Piney Creek trail and the network of roads up from Bear Canyon, then it will be more palatable to keep both Graham Trail and Stockman Trail open. If the Forest Service's objective is to make a nice loop for four-wheelers, this recommendation should serve that purpose.	
129-32	Route #2091 is part of a major motorized loop route on the top of Red Pryor and Big Pryor Mountains with many spectacular views. This motorized route (#2091) is supported by the Pryors Coalition.	
155-14	Route 2013 Graham Trail to be closed for public motorized use with the rationale (page C-16)	

Subject: Recreation	Response #: R-4, Looping Trail Opportunities
	of the DEIS that this constitutes a parallel road. This road also becomes another very important loop opportunity for the motorized user and also has historic significance to the area.
156-2	The planned closure of Graham Trail 2013: keeping this open would provide a loop with Stockmen Trail 2850, Trail 2012, the Bear Canyon 2814. Loop trails not only provide a wonderful riding experience, they also allow for less congestion on the trails.
158-2	Please do not close Graham Trail 2013. It loops with Trails 2496, 2850, 2018 and 2011.
158-3	Please do not close Trail 28501A. It loops with 2496, 2850, 2018, and 2011.
158-6	Please do not close Trails 2016 and 20162 off Horse Haven. It loops with 2091 and other trails off of 2091.
341-1	I support Alternative B, because it will be a good mix of opportunities for motorized and non-motorized, with the exception of the following. Planned closure of trails 2016 and 20162. These two trails make a nice loop up the south side of Bear Canyon and connect with 2091. This is a very easy ride for riders of less experience.
419-3	Under the alternative B I have found that the Grahm trail is to be closed for motorized use. This road has a great history and would offer an important loop experience.
420-1	The existence of motorized (OHV) looped trails allows for the greatest dispersal of people, which will enhance experiences for OHV users, walkers, hikers, hunters and any other users. ...Three trail routes coming off BLM land, going into the BRD land, are on Alternative Plan A but were not included on Alternative Plan B. All three routes provide good looping which will help all users. We feel strongly that the three trails which loop with other trails should be included in the Proposed Plan B. The three loop trails are: -Graham Trail 2013 - Horse Haven (BLM) to 2016 and 20162 - Trail 28501A. Alternative Plan B has the Punchbowl Trail #2144 stopping before it gets to the boundary with the CIR (Crow Indian Reservation). TSATV recommends extending the trail to the CIR boundary with a 50-inch OHV restrictive width on the trail. Trail adoption by TSATV is something we would be very interested in doing. Alternative Plan B does not show trails 20951 and 2091T on its map. We could not find in the DEIS any mention as to why these trails were not included or documentation supporting this apparent decision. Without appropriate information and disclosure of concerns, we feel trails 20951 and 2091T should remain open in the future.
421-6	The creation of quality, quantity, and complete trail designs will best serve all users. Having a large variety of trails and number of trail opportunities allows for temporary closures and trail maintenance with little interruption in use... The creation of looped trails will allow for the greatest dispersal of people as well as enhancing the experience of OHV users, walkers, hikers, and hunters. There is also an enhancement to the safety of users when there is more than one way out, should an emergency occur.
421-51	In Alternative B concerning Route 2013 Graham Trail is to be closed for public motorized use with the rationale (page C-16) of the DEIS that this constitutes a parallel road. This road also become another very important loop opportunity for the motorized user and also has historic significance to the area and runs by a commercial rock quarry which would not be affected by OHV activity or noise. This road allows families to take young members on training rides to increase their skills using motorized means. Though viewed as a parallel road, it still has different view, challenges and opportunities for families and groups. It is also a big loss when considering only 19% of the Bearooth District is available for motorized use.
423-2	Graham Trail #2013 makes loop out of Stockman and Bear Canyon because roads go to the same place hwys etc we don't close them. Trail 28501A loops with trails #2496, #2850, #2018Y #2011 if you go down one trail come back on another one change of scenery. Trail #2095 (Bainbridge) this trail is needed to access trail #20951 I also connects 2850 with 2091. Trail 2091T gives access to the opposite of the canyon as does trail 20951. Trail #20162 if closed would restrict use of trails #2091H4, #2091H3, #2091H and 2016 going into horse haven road it would also eliminate the loop. Trail #2091 should be left open to access Red Pryor Divide Road. Trail #2144 Punch Bowl this trail should be a 50" trail if this trail is closed it would take access to the Forest away. Trails #2073, 2073E should be left open for land owners and public use yearlong if closed access is also gone. Trails #2091 to 2095A and trail 2088 it will give people access in the off season. Trail #27 and Trail #22 should be single track and left open to them there aren't many areas with this designation.
424-2	As far as Alt. B (the preferred alt.) I think Grahm trail #2013 should be left on the map. The

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Subject: Recreation	Response #: R-4, Looping Trail Opportunities
	trail (road) is already in place and offers an alternative route to Stockman Trail and also provides a loop with Stockman and Bear Canyon trails. 2) The planned adm. trail #2095 should be left open for all use as a lower loop with Bear Canyon and #2091. 3) Even though trails 20951 and 2091T dead end they do provide an opportunity for great views on both sides of the canyon. 4) The system roads 2016 and 20162 would be better served as a system trail and provide an opportunity for a loop with the Red Pryor Mtn road #2091 and other trails connected with #2091. These lower roads/trails offer year round access where some of the upper Pryors would be closed due to snow or wet conditions.
427-1	The problem I see with Alternative B is the plan to closure of Graham Trail 2013 along with loops that include Trail 2850 and 2012, 2814 all of which have been open for years without any problems with multi-users. The trail plan for 2095 as administrative only is not acceptable when it is used by all people year round. I would like to see that the last half mile of Trail 2144 be left open to vehicle travel of 50" or less at this time. I also support the efforts of the TSA TV to adopt that trail and assist Forest Service in obtaining grants for these areas.
429-1	If you do alternative B then you will have to keep trails 2013, 2850, 2012, 2814, and 28501A and trails that make loop 2496, 2850, 2018, 2011, these need to stay open.
430-1	The trail that are important to me is the Graham Trail 2013 This is a loop trail that I take my friends on! This is a rock base trail and have great vista points! Also Robinson Draw open with all trail on Alt A
431-1	Trail 2013, 2850, 2012 Bear Canyon 2814. I enjoy riding my ATV in this area & I have been going to this area for years & I also enjoy camping there. (2) 28501A with loops 2496, 2850, 2018 & 2011 I enjoy riding in this area because I'm too old to hike. (3) 2095 I enjoy driving & camping in these areas (4) 20951 & 2091T - again I'm at the age where I can't walk very good & I enjoy using my ATV on these trails. (5) 2016 & 20162 with loops 2091 - again I'm of the age that I can only get around with an ATV. On Last 1/2 Mile of Punch Bowl trail 2144 again this needs to be a loop, not in one way & out. I recommend 50" or less motorized travel & support Treasure State ATVs efforts to adopt the trail.
432-1	I believe and want all of the loop trails open in Trail #2013, #2496, #2850, #2018, #2011, #28501A, #2091. I also would like trail #2095 (Bainbridge Draw), Trails #20951 & #2091T, #2016 & #20162, #2073, #2073E, Meyers Trail 27, & Lodgepole Trail 22. The Trails #2091 & #2095A, #2088 open year long. I would like Punch Bowl Trail #2144 open, & let the Treasure State ATV & other 4 x 4 clubs adopt this trail to assist in keep it out.
438-9	Recommendation made under Alternative B concerning Route 2013 Graham Trail to be closed for public motorized use with the rationale (page C-16) of the DEIS that this constitutes a parallel road. This road also becomes another very important loop opportunity for the motorized user and also has historic significance to the area.
489-4	Graham Trail 2013 - I would like to see this remain open due to the fact that it loops with the Stockman Trail 2850, Trail 2012, and Bear Canyon 2814. This is a nice ride with ATV and the loops create a better environment to keep over-use of the trails and subsequent erosion due too much concentration of motorized vehicles in one locale rather than many alternative loops.
489-5	Trail 28501A - As above, this trail loops with 2496, 2850, 2018, and 2011. Nice trail loops for motorized users and more opportunity for a wider selection of loops helps to keep travelers less concentrated and provides for a better recreational experience and less impact on the trails.
489-7	Trails 2016 and 20162 off Horse haven - These trails provide loops with 2091 and other trails off of 2091 and in keeping with my feelings about over concentration of users in any one area and not providing loops just creates more of an environmental footprint in the area. By having loops, the users only have to cross the area once so their impact is less than if they have to turn around and go across it twice in the same trip.
490-4	Graham Trail 2013 - I would like to see this remain open due to the fact that it loops with the Stockman Trail 2850, Trail 2012, and Bear Canyon 2814. This is a nice ride with ATV and the loops create a better environment to keep over-use of the trails and subsequent erosion due too much concentration of motorized vehicles in one locale rather than many alternative loops.
490-5	Trail 28501A - As above, this trail loops with 2496, 2850, 2018, and 2011. Nice trail loops for motorized users and more opportunity for a wider selection of loops helps to keep travelers less concentrated and provides for a better recreational experience and less impact on the trails.
490-7	Trails 2016 and 20162 off Horse haven - These trails provide loops with 2091 and other trails

Subject: Recreation		Response #: R-4, Looping Trail Opportunities
	off of 2091 and in keeping with my feelings about over concentration of users in any one area and not providing loops just creates more of an environmental footprint in the area. By having loops, the users only have to cross the area once so their impact is less than if they have to turn around and go across it twice in the same trip.	
Summary of Comments: Provide motorized looping trail opportunities.		
Response: Motorized loop opportunities would be available in varying degrees in each of the alternatives. Alternative A would provide the maximum number of loop opportunities; Alternative C would provide the least amount. The No Action Alternative, and Alternatives B and B Modified would provide differing amounts between the amounts in Alternatives A and C.		

Subject: Recreation		Response #: R-5, Game Retrieval
Letter-Comment #: 67-3	Game Retrieval. If carts are okay, why not motorcycles and ATV's in certain conditions. Why not within 300 feet of trails as with camping?	
155-13	Route 2073 and all of 2073E (page C-15) of the DEIS only allows for administration use even though there is a legal means of access. Opportunity needs to be given for the public to use these roads. Game retrieval and the need for a diverse opportunity for the motorized needs to be met.	
214-1	Page 1-6: Game Retrieval: We are not asking for cross-country retrieval, but retrieval should be allowed on routes closed during hunting season,...	
421-37	Under Alternative B concerning portions of Route 2073 and all of 2073E (page C-15) of the DEIS only allows for administration use even though there is a legal means of access. Game retrieval and the need for a diverse opportunity for motorized needs to be met, By opening these roads it would allow for this.	
Response: The Forest is not proposing to designate roads or trails for any motorized game retrieval. In a June 30, 2006 letter to Forest and Grassland Supervisors, the Regional Forester for Region One of the Forest Service, Gail Kimball, provided guidance that stated, "Travel off route for big game retrieval is not recommended and must have Regional Forester approval prior to initiating any proposals that consider off route use for this purpose". No extraordinary circumstances have been identified that warrant proposing motorized cross-country game retrieval on the District, consequently designation of motorized big game retrieval is not being proposed. The use of non-motorized game carts for game retrieval would not be affected by this proposal, and use would continue to be allowed outside of designated Wilderness areas.		

Subject: Recreation		Response #: R-6, Recreation Opportunity Spectrum
Letter-Comment #: 66-11	Please explain why the needs of non-motorized recreationists are provided for at a much higher level (quality and quantity) than motorized recreationists?	
66-13	Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.	
66-41	Resource allocation must include access to an equal number of quality recreational opportunities including alpine lakes, rivers, streams, and overlooks.	
66-42	In order to be equitable, recreational resource allocation between wilderness/non-motorized visitors and motorized/multiple-use visitors should be based on equal ratios. Indicator ratios should include acres of wilderness/non-motorized areas divided by wilderness/non-motorized visitors and miles of wilderness/non-motorized trails divided by number of wilderness/non-motorized visitors versus acres of motorized/multiple-use areas divided by motorized/multiple-use visitors and miles of motorized/multiple-use trails divided by number of motorized/multiple-use visitors using the number of multiple-use and wilderness visitors from the references cited above.	
66-43	A reasonable approach to the assessment of equal recreational opportunity would use a comparison of acres and miles of trails per non-motorized visit versus acres and miles of trail per motorized visit. An equal number of acres and trail miles per visit should be the goal but the current management scheme is not achieving this goal.... In order to be responsible to the public, we request that the preferred alternative address this disparity and reverse the trend by managing all of the project area as motorized multiple-use.	
66-57	A reasonable test of significance of impacts from motorized closures on motorized recreationists must be used. A reasonable test would include evaluation of indicators	

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Subject: Recreation	Response #: R-6, Recreation Opportunity Spectrum
	including... We request an adequate evaluation and consideration of these imbalances be made part of this project and actions taken that will correct these imbalances.
66-60	The amount of use that a route receives is not a criterion for non-motorized routes (see later comment about solitude on CDNST) and should not be a requirement for motorized routes. Solitude, challenging, and remote motorized routes are highly valued by motorized recreationists also.
66-75	We request that the difference in visitor use between designated wilderness/non-motorized/exclusive-use lands and multiple-use lands be acknowledged and adequately addressed in the evaluation. We also request a motorized recreation alternative with a recreation opportunity spectrum (ROS) comparable to the surrounding ROS available for non-motorized recreationists be adopted as the "proposed action".
66-84	We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.
66-121	We request that adequate consideration be given to a comprehensive inventory and analysis of all non-system roads and trails and the current recreational opportunity that they provide to motorized recreationists.
66-133	Therefore, motorized recreational opportunities are limited to a set number of designated motorized routes while non-motorized recreational opportunities can include cross-country travel opportunities and are, therefore, unlimited. This distinction has not been adequately recognized and we request that this distinction and advantage be recognized in the analysis, formulation of motorized alternatives and decision-making.
66-145	We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.
66-157	The analysis and decision must recognize that semi-primitive motorized opportunities are the highest quality and most sought after experiences.
106-1	Alternative B is woefully inadequate in curtailing damage by ORVs. It is not a balanced plan because it gives two-thirds of the Pryor over to ORVs and other motorized activities. It allows ORV traffic to continue on unauthorized routes that do not meet Forest Service design standards.
129-23	The Recreation data show that significantly more forest users recreate by walking than by OHV. Given these facts one would expect that the Forest would choose an alternative which does not significantly decrease non-motorized opportunities in favor of motorized opportunities. Yet the Forest's Preferred Alternative B decreases non-motorized recreation opportunity by nearly 15%, and increases motorized recreation opportunity by over 11%. This is especially surprising since Alternative C still provides more than half (53%) of the USFS Pryors for motorized recreation. (See table 3-16, page 3-30)
146-1	I am concerned that Alternative B for managing motorized use for the Pryor Mountains will cause further environmental degradation. Of those presented, I strongly support Alternative C as the best hope for restoring balance between motorized use and less environmentally damaging pursuits such as hiking, bird and wildlife watching, and horseback riding.
155-5	When evaluating the Recreation Opportunity Spectrum (ROS) (Page 3-18 of the DEIS) the interdisciplinary team should consider giving the motorized users the greatest spectrum of opportunity possible as fifty-five percent of the District already lies with the Absaroka-Beartooth Wilderness.....
156-6	...as many trails and roads as possible within the 19% must be made available for OHV use.
163-10	Alternative A is unacceptable... Why would 75% of the Pryors be designated for motorized management when only 2.9% of the users are OHV recreationists.
163-14	Alternative B is also unacceptable... Why would 63% of the Pryors be designated for motorized management when only 2.9% of the users are OHV recreationists?
206-2	Would it be accurate and truthful to say the non motorized users would just have to SHARE that percent of land they call a "loss" with motorized users? And specifically, only that land the trail actually exists on, as the motorized user still stays on a trail and a hiker has 100% access to all of that and all land through which a motorized trail passes?
214-8	With the large majority of the Beartooth area closed to motorized use the Pryors should emphasize motorized use.
214-10	Alternative A: Provides a good balance of motorized vs. non-motorized opportunities. For a

Subject: Recreation	Response #: R-6, Recreation Opportunity Spectrum
	motorized to achieve the same satisfaction as a non-motorized user more miles of route are required.
232-1	<p>I favor the least access of OHV's to the Pryors for the following reason,....1. OHV prices have been declining precipitously in the last three or so years, as Chinese-built OHVs, China-sources parts, an the attending price-competition to Canadian-, Japanese- and US built OHVs has sharply decreased prices: in some cases prices are cut by 60%. No PhD is statistics is necessary to predict the doubling or tripling or sales this decrease portends. I owned and operated a Honda motorcycle/OHV/scooter store in Tacoma WA from 1968 until 2003: I know what I'm talking about on this one. 2. The increasing "infirmity" of the US populations, caused mostly by a sedentary "life-style" and over-eating causes more and more persons to choose OHVs for their " wilderness adventure" because they do not have or desire the physical conditioning to walk ANYWHERE, and (continue the slothfulness) aren't about to walk where they can ride. The "entitlement" this self-inflicted infirmity confers to vehicular access has adversely affected hunting: landowners (I'm one, have a third-generation ranch at Luther MT) no longer allow hunting because of OHV-borne hunter abuse to terrain and game. Same abuses as you're seeing in the Pryors: destroyed signs, erosion, trampling, ruts, cut fences, illegal trespass ("streaking") on posted ground, and the impossibility of apprehending offers. Something about the power, speed, wheels, and roadless spaces just seems to bring out truant behavior in a lot of males. I have experience either negative effects of this truant behavior fist hand, and work closely with the MT FWP enforcement officer on this, with small effect: There's only one Kevin Nichols, and hundreds of OHVs and thousands of acres, and 'way more outlaws than the OHV crowd claims. 3. The increasing age of the US populations further suggests increased OHV usage, for the same reasons outlined in (2) above. 4. The increased population of (primarily) Billings and Yellowstone county suggests more OHV will be available to "further negatively impacts" (bureaucrateeze for "trash") the Pryors.</p>
274-1	The "preferred" alternative B, which allows motorized access to two-thirds of the land in the Pryor Mountains, is definitely not balanced use, especially when the Forest Service's own statistics indicate only about 4 percent of the recreational use in the Beartooth District is ATV use while nearly 50 percent is hiking and other non-motorized use.
288-5	Non-motorized Recreation Opportunity decreases from 33,913 acres in the No Action Alternative to 28,849 acres in Alternative B. This is a decrease of 5,064 acres, which is 14.9% of 33,913 acres. Decreasing from 43% to 37% of total (motorized and non-motorized acreage) is much more than a 6% decrease in the acres available for non-motorized users. This data clearly supports the choice of Alternative C as the Preferred Alternative.
307-20	In the Gallatin Forest ROD, Supervisor Heath indicated that even a 50/50 split between motorized and non-motorized use was uneven in favor of motorized users. Why then does the Custer Forest find 2/3 motorized split in the Pryors fair and acceptable?
353-2	Motorcycle and ATV users lost 97% of their riding areas in the tri-state agreement with the BLM and Forest Service in 2001. Further limiting the land available for motorcycle and ATV usage is unfair to the 29% of Montanans who participate in these activities.
396-18	The Pryors are an area that should be left open to motorized uses as it currently is. There are already thousands of acres of non motorized area available to non motorized users to the west in the Absorakee/Beartooth wilderness that is virtually the same distance from Billings which is the closest large metropolitan area where many users originate. The Pryors represent the only area in the CNF that provide somewhat of a balance between motorized and non motorized users. Without motorized use in the Pryors, the CNF would be mostly non motorized.
396-20	There has not been serious options of significantly expanding areas to motorized use to satisfy the ever increasing amount of motorized users.
416-5	In addition to the resource protection issues mentioned above, the Preferred Alternative (B) does not adequately provide a range of recreational opportunities. Specifically it does not provide for the diverse range of nonmotorized recreation activities commensurate with the majority of Forest users who want those opportunities now and in the future. The Preferred Alternative does not designate ANY non-motorized areas or routes. The claim that this Travel Plan decision is about motorized use and not about non-motorized use is disingenuous.
421-49	We believe the Custer should look at the numbers and side on keeping what little we have

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Subject: Recreation	Response #: R-6, Recreation Opportunity Spectrum
	access to open for all to enjoy. 80% Quiet use should be more than adequate for the number of users they have and the increased growth of OHV activity. By looking at these numbers, OHV users do not have an equitable access to the CNF. So we ask for the Custer to bring forward a better plan than the Forest Services Preferred Alt B. By our calculations from the numbers above, OHV only have access to 20% of the forest. Within that 20% we still only have very little area that the OHV are able to use, therefore we are asking for more access under the 2005 Travel Plans to meet everyone's needs.
461-16	Yet in the Affected Environment – Recreation section, ML 2 roads are left out of the semiprimitive motorized ROS classification even though the guidelines stated above clearly provide for their inclusion. In fact, the definition provided in the Beartooth DEIS states, “Semi-Primitive Motorized settings extend about one-half mile on each side of a trail where motorized OHVs are legal to be used.” (emphasis added) (DEIS, p.3-21). With this definition the Forest Service arbitrarily excluded all roads from the semi-primitive motorized ROS classification, thereby providing an artificial evaluation of effects for the entire recreation analysis in violation of NEPA. At the very least, each ML 2 road should be identified, and an explanation given why it does not fall within the semi-primitive motorized ROS classification. Until these corrections are made, the Custer NF cannot adequately determine the cumulative impacts of the alternatives.
461-86	We are concerned that the DEIS did not adequately analyze the negative impacts to the quiet recreationists’ experience from motorized use.
467-2	In conjunction with Alternative C’s route network, we request that the Custer National Forest incorporate a Recreation Opportunity Spectrum (ROS) zoning approach into the alternative to more effectively secure conservation and quiet-use enclaves and, additionally, build into all of the alternatives robust travel management plans - whose contours are detailed below - to complement the travel designations
467-29	We have particular concerns that the preferred alternative does not adequately meet the visitor use projections, especially in the Pryor Unit. The current preferred alternative, B, designates 63 percent of the unit for motorized use in the ROS classification system. Alternative C designates 53 percent of the unit for motorized recreation, yet this still will give over half of the unit to motorized users who will constitute only 7.9 percent of visitors by 2018. No alternative was developed that accurately reflects the visitor use projections; comparing two alternatives that are only 10 percent apart in motorized use designations is not meeting the National Environmental Policy Act requirement to analyze a full range of alternatives.
Summary of Comments: Many commenters were concerned about the balance of motorized and non-motorized opportunities, consideration for future use projections and the methodology used.	
<p>Response: The FEIS analyzed a range of motorized and non-motorized opportunities, especially in the Pryor Unit. This analysis included an alternative intended to represent an emphasis on motorized opportunities and one intended to emphasize more non-motorized opportunities. In addition, two alternatives, Alternative B and B Modified, tend to serve as compromises between the two primary preferences for more motorized opportunities and those for more non-motorized opportunities.</p> <p>The FEIS uses the Recreation Opportunity Spectrum (ROS) as the <i>indicator</i> of acres available for motorized and non-motorized recreation opportunities. The ROS analysis of the alternatives in the FEIS was based on guidance in the National ROS Inventory Mapping Protocol. The analysis relied on identification of existing and proposed travel routes as the basis for establishing the ROS settings for each alternative. The analysis used GIS-generated acreages associated with motorized and non-motorized settings to aid in determining effects. The analysis does not use the sub-categories under motorized and non-motorized settings (i.e. semi-primitive motorized, rural, primitive, etc.) to make effects determinations. This is one reason that Maintenance Level 2 roads were classified as roaded natural, rather than split into semi-primitive motorized and roaded natural, since this level of detail was not directly relevant to the analysis. In addition, maintenance level 2 roads do not fit well into the semi-primitive motorized category, because state motor vehicle law requires vehicles on roads to be highway legal. The semi-primitive motorized category is generally associated with use by off-highway vehicles, or vehicles that are not highway legal. Further information about ROS and this methodology is contained in the Recreation section of Chapter 3.</p> <p>The percentage of the Pryor Unit in motorized ROS settings by alternative does not mean that those acres would be managed solely for motorized recreational uses. They also provide opportunities for non-motorized recreation and</p>	

Subject: Recreation	Response #: R-6, Recreation Opportunity Spectrum
access for a broad range of activities.	
Some of the suggestions listed in the above comments, such as land zoning, are outside the scope of this analysis. Please see Appendix G Actions Outside the Scope of the Decision, and Chapter 2 Alternatives Dropped from Further Consideration for more details.	

Subject: Recreation	Response #: R-7, Route #22 (Lodgepole) & #27 (Meyers Creek)
Letter-Comment #: 25-4	Horsemen have used and do use this area and there is absolutely no reason motorcyclist need to be banned in order for horsemen to be encouraged to use this area.
32-2	This is an area that should be available to hikers/horseback riders/hunters as non-motorized trails only.
33-1	I agree with Alternative B & C for Lodgepole and Meyers Creek areas. As former landowners, then annual visitors, and now current leasees of property bordering on both Lodgepole and Meyers Creek area since 1975, my family holds sacred the continued remoteness and quiet of the wilderness areas in question. These areas are no place for motorized vehicles; the noise, air pollution and general disturbance of the vehicles change the complexion of one of the most beautiful spots in the state (and country), not to mention the negative impact on important elk migration and all the high quality wildlife habitat these areas provides. Closing these areas to vehicle traffic would also provide a much-needed non-motorized area for hikers/horseback riding and hunting.
65-1	I wanted to cast my 2 cents worth in support of either Alternative B or C for the Lodgepole Meyers Creek Areas. The best case scenario would be to close it completely to motorized traffic to minimize impact on game habitat and yet keep it available to access for foot traffic and horse traffic to the more remote areas to the north.
97-2	Route #22 and Route #27 are proposed to be closed to motorized, these two routes are the only single track routes in the Custer Forest (to my knowledge) and BIAS is being shown as these routes will "provide additional opportunities for pack and saddle stock use". Is not the "Wilderness Area and Wilderness Study Area large enough for them? There are no proposed new routes for the ATV and the "jeep" use.
132-4	Closing trails should not be your mission. With the dirt bike sport growing, more trails should be opened. Route 22 and Route 27 are the only single-track trails. If you have not ridden single track, there is nothing like it. Keep these trails open to motorized vehicles to our neighboring forest.
155-11	Single track trails Meyers Creek (trail#27) and Lodgepole (trail#22) need to be reassessed for the following reasons. In the entire Beartooth District these are the only single track motorcycle trails available.
156-5	Planned closure of Meyers Trail 27 and Lodgepole Trail 22 to Single Tracked Motorized Travel: This is the only single track motorcycle trail available in the Beartooth District.
158-12	Please do not close Meyers Trail 27 and Lodgepole Trail 22 to Single Track Motorized Travel; they are the only trails open to single track users in the Forest District.
190-1	These two trails are #27- Meyers Creek and #22 - Lodgepole. The main reason given is due to the interruption of the game migration patterns. Do you have documented studies of this? If so we would like to see these studies and over how many years have they been done? The reason for our or my concern is that the authorized use of these trails as well as others had been going on for 50 years. The use of these trails has not produced user conflict or created resource damage. The use of these trails by motorcyclers has been to produce that Forest outdoor experience while not being subjected to other forms of motorized use.
214-2	More opportunities for single-track motorcycle trails should be readdressed and allowed.
299-1	It is our understanding that the Custer National Forest Service preferred Plan B is to delete these two trails from areas that allow motorcycle usage. The trails cover a total of less than eight miles but are very valuable to continued motorcycle use in the Custer National Forest. The trails also provide access to additional motorcycle trails in the Gallatin National Forest. If these two trails are closed, Gallatin National Forest has indicated they will close the trails that connect with Trails 22 and 27, further limiting access in the National Forest.
347-2	Finally, by closing the Meyers Creek and Lodgepole Trails to motorcycle use will limit access

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Subject: Recreation	Response #: R-7, Route #22 (Lodgepole) & #27 (Meyers Creek)
	to valuable motorcycle trails in the Gallatin Forest. This access allows for extensive riding in the Gallatin that cannot be reached any other way. If these trails are closed, the Forest Service is threatening to close even more riding in the Gallatin Forest.
348-3	Finally, by closing the Meyers Creek and Lodgepole Trails to motorcycle use will limit access to valuable motorcycle trails in the Gallatin Forest. If these trails are closed, the Forest Service is threatening to close even more riding in the Gallatin Forest.
349-2	Finally, by closing the Meyers Creek and Lodgepole Trails to motorcycle use will limit access to valuable motorcycle trails in the Gallatin Forest. These trails allow motorcyclists to access trails that are some of the few still open to motorcycles.
351-2	However of major concern to me is the closure of Meyers Creek and Lodgepole Trails. These are great motorcycle riding areas and one of the few areas still open to motorcyclists. More importantly these trails allow us to access the trails in Gallatin National Forest.
352-3	In addition, I believe that the Meyers Creek and Lodgepole trails must be left open to allow continued access to more trails in the Gallatin Forest Area.
353-4	Finally, by closing the Meyers Creek and Lodgepole Trails to motorcycle use will limit access to valuable motorcycle trails in the Gallatin Forest. This access allows for extensive riding in the Gallatin that cannot be reached any other way. If these trails are closed, the Forest Service is threatening to close even more riding in the Gallatin Forest.
354-3	I would also strongly encourage you to keep the Meyers Creek and Lodgepole areas open to motorcycle usage. For those of us who use these trails, they are invaluable in a state where less and less public land is open to motorcycle usage. We also need them to remain open in order to access other trails in the neighboring Gallatin Forest.
362-6	Closing the Meyers Creek and Lodgepole Trails to motorcycle use will limit access to valuable motorcycle trails in the Gallatin Forest. If these trails are closed, the Forest Service will likely close even more riding in the Gallatin Forest.
396-16	Meyers Creek area (Lodge Pole #22, Meyers Creek #27) that are open to motorized use are proposed to be closed by the plan. I highly object to closing these two trails to motorized use because they are the only motorized trail opportunities available in an area that lies adjacent to thousands of acres of non motorized wilderness.
396-17	The new travel plan in the Gallatin National Forest closes the adjoining trails in the GNF on the rationale that the Custer National Forest was closing the trails that lie within the Custer. This was a bogus rationale because at that time the Custer had not even began the travel planning process. Myself and a few other users pursued this issue with the Gallatin NF employees and eventually met with then Supervisor and Assistant Supervisor Becky Heath and Jon Allen who admitted that the rationale used for closing the connecting trails on the Gallatin side because the Custer was closing their side was a mistake on their part. Becky Heath wrote a letter to us that was also forwarded to your office that stated that the Gallatin National Forest would reconsider those trails (#22, #27) as motorized loop opportunities dependant upon if the Custer National Forest would reciprocate. ...Would this letter carry any weight in influencing your decision regarding these two trails?
412-1	Meyers Creek trails (please note that when we say "trails" we are writing about motorized routes that can include roads) #27 & #22. These are the only two motorcycle specific trails in the entire District and as such should be maintained as motorcycle trails.
420-5	The planned closure of Meyers Trail 27 and Lodgepole Trail 22 to single track motorcycles is a concern. Although ATV's do no use these trails, we do have members who also ride single track machines. Due to the limited single track mileage in the Beartooth Ranger District, the closure of these historically used trails is of concern. We are not aware of user conflicts on these trails. Seasonal closures for elk migration and hunting appears to be a reasonable solution.
421-17	All trails in this area should remain open as single-track trails for activities under the 50" class rating. The Meyers Creek single-track trail going from the Custer National Forest into the Gallatin is the only identified motorcycle trail and should be allowed to remain this way. Meyers Creek trail #27 & 22 create a looping opportunity to connect with the trail system back to Iron Mountain for a enjoyable loop and also connect to the Galliton (sic) and you can come out in Big Timber.

Subject: Recreation	Response #: R-7, Route #22 (Lodgepole) & #27 (Meyers Creek)
421-29	Trail 22 is also used by horseback riders and should be allowed to remain this way. This area should be used as a single-track area for all activities falling under the under 50" class rating and dual use. The proposed closure to the horseback riders on trail 2 & 2D, we would like to keep these trail's open to horse backers. This trail connects with trail 1 for a loop opportunity and to connect with good fishing lakes and hunting areas.
431-3	I want trail 27 & Lodgepole trail 27 open all Motorized travel. I could support seasonal closure for Elk migration & Hunting
438-1	The proposed conversion of Route #22, Lodgepole Trail and #27 Meyers Creek Trail to non-motorized use is not supported with documentation and scientific rational for the change. Motor Vehicle Route and Area Designation Guide, National OHV Implementation Team V111705, page 26 states: Purpose and Need. Changes to the forest transportation system are evaluated as site-specific proposal. Each proposed action required a site-specific statement of purpose and need, which should be narrowly tailored to the proposal. The statement of purpose and need should enumerate the rational for the site-specific changes being proposed. Chapter 3, page 94 refers to 'reduce risks to water resources' by closing the trail to motorized travel, Table 3-31, page 86 shows "Lodgepole Creek, Maintain and monitor". The attached appendix A contains two water quality studies conducted in other areas to be added to the discussion on last paragraph, page 3-82. While they were not conducted on the area in question or in Montana, the conclusions and management actions taken show area closure is not the answer to the possible risk to the water resources and Your Appendix C page 16, offers two different rationales: 1. "Provide additional opportunities for pack and saddle stock". Our comment: With 345,000 acres of the Absaroka-Beartooth Wilderness Area lying within the District it would appear the opportunities already exist in abundance. If there is a need for more pack and saddle stock opportunities, it should be supported by documented monitoring of actual usage in the area. 2. 'Reduce disturbance to wildlife habitat and provide a non-motorized hunting experience'. Comment on the non motorized hunting experience: Documented objective evaluation and monitoring of the hunting areas must substantiate the need for more non motorized hunting experiences. If that need is proven, a restriction on these trail during hunting season would be reasonable mitigation
450-1	Please do not close Myers creek and Lodgepole trails, myself and my kids deserve a place to ride now and far into the future.
482-3	Meyers Ck, Lodge Pole, Lakefork, East of Bear Creek, Horse Haven, Nicoles Ck and Line Ck are all good trails for motorcycles and should remain open or be enhanced to permit fourwheelers.
489-9	Meyers Trail 27 and Lodgepole Trail 22 - I would like to see these trails left open for single track users since these are the only single track trails in the district. Seasonal closures for elk migration and hunting may be acceptable subject to accurate data.
490-9	Meyers Trail 27 and Lodgepole Trail 22 - I would like to see these trails left open for single track users since these are the only single track trails in the district. Seasonal closures for elk migration and hunting may be acceptable subject to accurate data.
496-1	This letter is in regards to the proposed Beartooth Ranger District Travel Management proposal and specifically authorized motorcycle trails #27-Myers Creek and #22-Lodge Pole.... I am opposed to this proposed closure.
Summary of Comments: Some want Trail 22 and Trail 27 designated for motorcycles, other would like to have these trails available for non-motorized use only.	
Response: Alternative B Modified proposes that Lodgepole Trail # 22 and Meyers Creek Trail #27 remain designated for motorcycle use. A season of use of 6/15 to 12/1 annually would be placed on the trails. The season of use would address wildlife concerns associated with the trails. This proposal would then address wildlife concerns, provide opportunities for non-motorized recreationists to use the trails when motorized vehicles would be prohibited, and provide opportunities for motorcycle use. In addition, these routes would provide linkages to motorized routes on the adjacent Gallatin National Forest.	

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Subject: Recreation		Response #: R-8, Motorized Single Track Trails
Letter-Comment #: 30-2	More trail designations means more mile for non street legal machine riding.	
66-8	Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use.	
66-9	Single-track challenge trails are needed for expert riders and trials type motorcycles.	
66-50	If light use is being used as a criterion to close motorized routes, then it would also seem fair to convert non-motorized trails that see light use to motorized routes in order to address the concern of over-usage and shortage of motorized routes. We ask for your consideration of this reasoning.	
66-58	Existing single-track trails or potential single-track trails were not adequately identified and included in the project.	
66-59	There is no legitimate reason why the single-track trails in the multiple-use areas of the project should not be shared between motorized and non-motorized recreationists to a much greater extent. This reasonable alternative must be included.	
66-76	The evaluation needs to distinguish the difference in trail requirements and impacts between atvs and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.	
Summary of Comments: Would like more single track motorized trail opportunities.		
Response: Analysis of single track trails for mixing motorized and non-motorized uses outside of Wilderness has been completed (see Project Record). No additional mixed use single track trails were identified.		

Subject: Recreation		Response #: R-9, Winter Designation
Letter-Comment #: 66-163	Winter ATV riding has become very popular and winter ATV areas should be considered as part of the proposed action.	
<p>Response: Over-snow vehicle (ex: snowmobile) use is not a part of this proposed action. The 2004 Beartooth District Travel Management Proposal included proposed changes in the restrictions on over-snow vehicle use. Public comments on over-snow use were limited in scope and general in nature. The majority asked that the restrictions not be modified to allow an additional 69,000 acres of over-snow vehicle use. The few other comments that addressed over-snow vehicles indicated that all public lands should be open to all types of motorized vehicles including snowmobiles, and that the analysis needs to evaluate different types of motorized use, including snowmobiles, separately. No comments requested specific areas for over-snow vehicle use. One comment suggested specific areas that should be closed to over-snow vehicle use, which included the Red Lodge Creek and Palisades areas; however it did not provide clear resource, cultural or social rationale for why these areas should be restricted.</p> <p>The interdisciplinary team reviewed the existing snowmobile management direction in the Custer Forest Plan, the 2007 Lynx Decision, and information in the 1987 Beartooth Travel Plan. The team also reviewed current use and determined there were no specific resource issues with existing use. Based on this information, the interdisciplinary team recommended to the Responsible Official that over-snow vehicle use be dropped from the proposal, because there was no resource-related need for change from the existing use. The Responsible Official reviewed the situation and determined it was appropriate to drop over-snow use from the proposal. If an action alternative is selected, the 1986 Forest Plan, as amended, will be used as the foundation for regulating over-snow vehicle activities.</p> <p>The public has indicated that better signing is needed along Highway 212 so that over-snow vehicle operators are aware of the boundaries of the Highway 212 corridor and do not inadvertently stray outside of the corridor. This action is outside the scope of this proposal, but Forest Service staff have noted this need and will consider this during future project planning and for potential grant requests.</p>		

Subject: Recreation		Response #: R-10, Route #2144 (Punchbowl)
Letter-Comment #: 155-12	Route 2114 Sage Creek (Punchbowl area) (page C-18) of the DEIS does not allow motorized traffic to extend to the forest boundary with the Crow Reservation. I recommend that from the existing water trough to the forest boundary be limited to the fifty inch motorized traffic only. This would limit heavy traffic from this area but still allow a means to gain access to the limit of the forest.	
163-13	The Punchbowl should be non-motorized for wildlife and quiet recreation.	

Subject: Recreation		Response #: R-10, Route #2144 (Punchbowl)
421-52	The Sage Creek trail, route 2114 (Punch Bowl) does not allow motorized traffic to extend to the forest boundary with the Crow Reservation. A recommendation from a local ATV club, Treasure State ATV, would be to extend the trail from the existing water tank to the forest boundary but with a limit not to exceed a 50 inch wheel base. This would limit heavy traffic but still allow access to the limit of the forest. Treasure State ATV has also expressed an interest in adopting this area of the trail to insure it is maintained to a high standard.	
Response: Alternative B Modified proposes designation of the eastern most ½ mile of Punch Bowl for less than 50 inch motor vehicles contingent upon mitigation of the erosion/soils issues. No other alternatives were changed from the DEIS to the FEIS concerning this route.		

Subject: Recreation		Response #: R-11, NVUM
Letter-Comment #:	Your data shows, both nationally and locally, that OHV visits are a very small fraction of overall Forest visits, and you project, in Table 3-15, a DECREASE in the fraction of use from 2.9% of visits to 1.8% of visits by OHV users by 2018. Yet you say this: The trend information presented above suggests that growth in both motorized and non-motorized activities is predicted to be essentially the same. The information also suggests that there is possibly a greater volume of users seeking non-motorized activities than motorized activities, but that the projected rate of increase in volume is anticipated to be nearly the same for both activities. This suggests that there may not necessarily be an obvious, dominant future demand for one or the other types of activities. This also suggests that providing considerably more opportunities for one or the other activity would not necessarily be responsive to the public as a whole, but that there is demand for a broad range of opportunities. (3-33) That conclusion, according to your own data, is simply false. In fact, the use that is growing most rapidly, and which already is far more important than any other activity except walking (according to the same table 3-15), is wildlife viewing, which you eloquently describe this way: "Viewing' encompasses hearing coyotes or elk or sharing a trail with the tracks of a bear or wolf." (Table 3-14). Alternative B means sharing a trail with the track of an ATV.	
47-3		
66-36	Based on our estimate that 41% of the visitors are OHV recreationists, we estimate using the NVUM data for total visitors that the total number of OHV visits to the Custer National Forest is 748,500 = (850,000 x .41).	
66-37	The agency does not observe visitors on weekends and holidays and consequently is unaware of actual visitor usage. The agency simply needs to go out and count the different recreationists and mode of access on multiple-use lands on any weekend.	
66-38	We feel very strongly that the current approach and data used by the agency to represent the historic public use of multiple-use lands does not provide an accurate representation and that the table of observations above is a more reasonable representation.	
67-18	Recreational Trends. NVUM "survey data shows that OHV use is a specialized use of the forest and not a major recreational use for most forests." This statistic has been interpreted completely wrong as evidenced by our observations. The agency has no site specific data that would back this statement up.	
97-3	The Forest Service has failed to provide a viable survey to show actual usage of the Custer Forest areas. I did an informal survey and it showed 249 days spent recreating ("jeep" trails) from 24 members that were present at our November mtg. If this is even close to being accurate, your numbers are not.	
155-3	...the economic effects of the forest area are so skewed that when trying to formulate an opinion on how the Pryor's are being used makes the information presented unusable. The NVUM information on economic analysis and activity participation used (kovis et al. 2003) was from total district forest numbers which does not in any way depict economic impact generated from motorized recreation use in the Pryor's.	
214-4	table 3-3, pages 3-6&7 should be broken down, showing use in the Pryors and use in the Beartooth area.	
214-7	Table 3-15, page 3-29: Is not complete it excludes hunting projections, which are a good percentage of the forest use.	
307-19	The NVUM data shows that from 2.9 to 3.163% of total recreational use in the Custer National Forest is OHV use. 47.8% of Forest use is hiking and walking. Dedicating 2/3 of the Pryors to motorized use is not in line with these statistics.	

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Subject: Recreation	Response #: R-11, NVUM
387-16	A survey conducted by the Beaverhead Deerlodge National Forest shows that less than 3 percent of the forest users recreate in wilderness areas. There are more exclusive non-motorized/wilderness areas and trails (both quality and quantity) than OHV areas even though NVUM statistics for all national forests show that there were 8,602,000 wilderness visits and 239,415,000 multiple-use visits or 3.59% wilderness and 96.41% multiple-use (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). It stands to reason that this information on the BDNF would apply to the other National Forests in Montana.
387-20	Motorized use on public lands is the fastest growing type of recreation in the U.S. today. The USDA Southern Research Station validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf). This document reports that the total number of OHV users has grown to 49.6 million by the fall 2003/spring 2004 out of a total population of 214,022,000. Therefore, the overall percentage of OHV recreationists in the country is 23% and it is much higher in Rocky Mountain States often approaching 30%.
411-24	Page 3-7 estimated no. of visits for horse back riding was 2,275 visits. Who conducted the survey and analysis to arrive at this no.? Does the CNF have these survey sheets to back up this info and names of the people surveyed? Where were these monitoring sites set up and when were they conducted before August of 2003? Are they're (sic) any other dates that monitoring and surveys occurred after August 2003 for this economic and visitor data in this DEIS?
420-6	We question the reliability and usefulness of the NVUM in general. With an 80 percent confidence level there was a +/-25.6 percent visitor factor. The NVUM data on the Custer Forest level would indicate, when rolled into the national NVUM, the national NVUM is in question. Any use of the national NVUM data in reverse would make forecasts and other analysis even more questionable.
421-1	The Custer Forest Service has been unable to supply projected usage figures as to the breakdown of the different types and numbers of users in the Pryor Mountains. Based on observations by previously identified user groups of the Pryors, OHV recreation could easily comprise 80-90% of current usage.
421-23	How many times were we surveyed by the FS? (Us - Clubs) We received a impromptu survey done by the one of the local OHV clubs of its members. It found that the average of the clubs own members were using the trail systems 249 of the 365 days a year. This is only one club. With this information, it counters the graphs used in the DEIS as being viable information. With this information, it counters the graphs used in the DEIS as being viable information. If they are not accurate, how can we justify using the information given in the DEIS. We know that a great deal of time and effort went into creating the DEIS, but we do not feel it accurately addresses all user groups. With this in mind, we do not feel that the 2005 Travel Rules are not being met under the mitigation of the increase in OHV users and the non-motorized users do not have a trail system they need for the aging community.
438-3	The NVUM figures are not representative of the areas addressed in the DEIS. The NVUM studies were conducted on the entire Custer National Forest at various locations. The results are not quantified by Mountain Range, Forest District or even county.
461-18	This suggests that there may not necessarily be an obvious, dominant future demand for one or the other types of activities.” (DEIS 3-31). This conclusion is not supported by the accompanying statistics, considering that not only do the visitor use numbers show that far more visitors engage in hiking than in OHV use in the present, but also that an 8% increase of 271,866 hiking/walking visits (an additional 21,749 hikers/walkers) is significantly larger than a 7.9% increase of 16,494 OHV visits (an additional 1303 OHV visits). Looking at the projections for non-motorized use, it is clear that such activities will continue to dominate future use, and in order to minimize user conflicts, the preferred alternative should reflect this fact. We have particular concerns that the preferred alternative does not adequately meet the visitor use projections in the Pryors Unit. No alternative was developed that accurately reflects the visitor use projections; comparing two alternatives that are only 10 percent apart in motorized use designations is not meeting NEPA’s requirement to analyze a full range of alternatives.
467-28	DEIS Table 3-15 shows that OHV use was 2.9% versus 47.8% for hiking/walking in the Custer National Forest's 2003 National Visitor Use Monitoring Report. The table also projected OHV use to increase 7.9% by 2018 while hiking/walking would increase 8.0%. In regard to these

Subject: Recreation		Response #: R-11, NVUM
	projections, the DEIS states, "The information also suggests that there is possibly a greater volume of users seeking non-motorized activities than motorized activities, but that the projected rate of increase in volume is anticipated to be nearly the same for both activities. This suggests that there may not necessarily be an obvious, dominant future demand for one or the other types of activities" (3-31)." The conclusion here seems arbitrary and capricious considering that an 8% increase of 271,866 hiking/walking visits is significantly larger than a 7.9% increase of 16,494 OHV visits.	
Summary of Comments: Question the reliability and usefulness of the NVUM data used.		
Response: The Forest Service does conduct work activities on the weekend, and during weekdays, and observes visitor use during these times. However, these incidental observations are not formal survey work and relying on this information for effects analysis is not likely to be supportable. Formal survey work, such as the NVUM, is a more reliable set of information for making effects determinations, and represents the best available information.		
The National Visitor Use Monitoring protocol is designed to be repeated every 5 years. The survey dates, times, and places are assigned to sample visitors on a random basis and capture a range of use levels at different sites across the Forest. The schedule is assigned to the Forest by the national working group. The interviews conducted are voluntary on the part of the participants and confidential regarding identity. The activities and their participation rates are for the Custer National Forest. No further breakdown of this information to portray use at the Ranger District level or to show use differences between the Pryor and Beartooth units is available. The limits associated with the "snap shot" of data available from our 2002 sample are recognized. Describing existing condition or trend did not rely on this information alone, but a variety of sources were used to provide a rounded look at recreation trends. Please refer to Chapter 3: Recreation for the full discussion of visitor use data and trends.		

Subject: Recreation		Response #: R-12, Route #2088 (Shriver Peak)
Letter-Comment #: 129-34	1. Routes #2088 on Big Pryor Mountain should be converted to a non-motorized trail. It causes considerable negative impact on resources and non-motorized recreation, without great gain to motorized recreation.	
163-12	Route 2088 should also be closed to protect resources and provide a quiet area NW from Crater Ice Cave.	
288-1	We urge that if adopting Alternative C do not allow the two track route #2088 to extend miles into the heart of the Big Pryor North Hiking, Riding and Resource Protection Area. We urge the FS to preserve this area for quiet recreation and wildlife. Route #2088 should not be open to motorized use west of Crater Ice Cave.	
315-1	Alternative C should be adopted but only if it is modified to limit the extension of two-track route #2088. Instead of extending this route for miles into a quiet and sensitive wilderness area please consider limiting #2088 so there is no motorized use west of Crater Ice Cave.	
403-4	Also Route #2088 should not be open to motorized use into the Big Pryor North Hiking, Riding, and Resource Protection Area. Keep this area for the quiet users including wildlife.	
441-1	Trail #2088 should not be open to motorized use because it runs deep into the Big Pryor North Hiking Riding, and Resource Protection Area. Motorized use risks resource damage and diminishes opportunities for hikers and stock users.	
Summary of Comments: Route #2088 should not be designated for motorized use.		
Response: Alternative B Modified would not designate a 2.2 mile section of Shriver Peak Road to the west of Crater Ice Cave and east of the junction with 2095A to reduce potential impacts to cultural resources. This would indirectly address desires to have additional non-motorized recreation opportunities in this area. The remainder of the route would be designated with a season of use restriction to provide access to Crater Ice Cave, range improvements, and motorized recreation opportunities.		

Subject: Recreation		Response #: R-13, Congestion
Letter-Comment #: 2-2	But don't be closing all these little turnouts people use, because it will cause major congestion....	
31-1	I support Alternative A. When I look at the difference between Alternative A and B I see the future issue of overuse. You will have less trails with more people riding each year. When I use the trails now I can ride for several hours without seeing a lot of people. Thus not as much use on the existing trails and also less damage. I have used these trails a lot over the years and	

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Subject: Recreation		Response #: R-13, Congestion
		rarely see hikers. I believe they have every right to be there as do the horsemen but so do I.
133-1		In my opinion, too many trails are being closed. If you close all of these trails, you will unnecessarily over crowd the trails left open. Will this not cause more problems? Route 22 and Route 27 are proposed to be closed to motorized vehicles. Route 2013 2850 and 2850B are needed to, like I stated before, keep the trails from overcrowding. And Route 2091, why can't we get within 300 feet of the Potential Impact Area? Your reasoning for closing many trails is the lack of "camping opportunities". When we ride, we cover 50 to 75 miles per day. We do not intend to camp on the trails.
193-1		It would be just great to leave all roads open as they are now. If two roads are parallel going to the same destination that helps to keep the roads from getting congested. Lets not close one of these type of roads!
213-2		...reducing the numbers of trails and roads would not be in the best interest of either area. Having a number of trails available is best, less erosion, less damage to the trails.
224-1		Of the 4 Alternatives offered I prefer Alternative A for the North Beartooths, which includes most of the current system and non-system roads. Leaving as many roads open to vehicle travel as possible provides the most recreational opportunities, which will reduce concentration of vehicles in one areas as well as illegal off-road travel.
237-1		I support opening more land to multiple use. Limiting the area for motorized use will only concentrate the users to a smaller area and increase changes of damage. If people are allowed to spread out then changes for any problems will be decreased.
396-7		Typically I will only encounter one or two other users on a trail, usually within a short distance from the trailhead. This amount of use has a very minimal effect on the forest resources. This could change with the new plan because the ever growing number of users would be restricted to a much smaller area, resulting in the definite possibility of severe overuse. Why would the CNF which to concentrate motorized users to just a few areas?
403-3		In addition we also support identifying Route #2492 as non-motorized. By so doing the travel plan would separate motorized and non-motorized users traveling up the ridges above Bear Canyon. This would reduce the motorized congestion at the mouth of Bear Canyon and through the entrance, and help preserve the peace, quiet, and habitat.
412-8		Parallel roads and Trails #2013, 2092B, 2097B, 2097C, 2850B - These do provide increased access as the DEIS Alt. B states, but they provide recreational diversity and opportunity if a effective trail system is to be implemented. The need for a diverse trails system that allows users to spread out away form one another is highly necessary for the District maintain an effective trail system. Just as parallel hiking trails spread out high traffic and maintain a different experience for the user these parallel trails do the same. The parallel trails listed also provide a variety of loop opportunities where shorter loops would not be available otherwise.
421-43		This is the only area [Map 4, Area 4] represented on this map with multiple use areas. All available trails on this section should remain open and accessible. These existing roads and trails are used as dispersing sites and are needed to combat crowding.
Summary of Comments: The fewer number of motorized routes will increase the number of people on the available routes.		
Response: There is insufficient existing information to determine if the action alternatives would have substantive, specific effects on motorized recreation congestion. The number of motorized routes miles for each alternative can indicate if there is any <i>potential</i> for the alternatives to have effects related to congestion relative to the No Action Alternative. Based on miles of motorized routes, Alternative A (341 miles) has <i>potential</i> to reduce congestion related impacts, Alternative C (198 miles) has <i>potential</i> to increase congestion related impacts, and Alternative B (261 miles) and B Modified (267 miles) would result in a slight chance to increase congestion, but are not likely to change congestion conditions relative to the No Action Alternative (287 miles). See the Recreation section of Chapter 3 for more detailed discussion of this subject.		

Subject: Recreation		Response #: R-14, Route #28501A (Timber Canyon)
Letter-Comment #: 155-15		Route 28501A located on the west side of the Pryor's...If in fact this road is proposed for closure it will be one more instance where a motorized experience will be lost. Having traveled this route many times it gives a total different visual backdrop to this area as when using on either side.
		Trail #28501A is a needed trail for winter motorized access because the trails #2850 & 2496

Subject: Recreation		Response #: R-14, Route #28501A (Timber Canyon)
412-3	can become impassible and dangerous in middle to late winter because of snow drifts. Also each trail provides a different vantage point while maintaining a loop opportunity for short or long excursions for motorized users. This trail also connects an open BLM road to the FS and would cause confusion if closed at the FS boundary.	
421-35	In Alternative B concerning Route 28501A located on the east side of the Pryor's was not listed in the DEIS (page C-16) as a road or trail to be designated for public motorized use. If in fact this road is proposed for closure it will be one more instance where a motorized experience will be lost. Having traveled this route many times it gives a total different visual backdrop to this area as when using routes on either side. We ask the Forest Service to reconsider the Alt A plan and to do the analysis of the plan to keep this looping trail open.	
438-10	Recommendation made under Alternative B concerning Route 28501A located on the west side of the Pryor's and not listed in the DEIS (page C-16) as a road or trail not to be designated for public motorized use but still not shown on the Alternative B map. If in fact this road is proposed for closure it will be one more instance where motorized experience will be lost.	
Response: This route is analyzed for designation under Alternative A. Under other action alternatives, this route was considered a parallel route in close proximity to Stockman Trail # 2850, and was not proposed to be designated for motorized use.		

Subject: Recreation		Response #: R-15, Area Designation
Letter-Comment #: 66-160	Provide open or play areas for motorized recreation opportunity and trials bikes where acceptable in selected areas.	
421-46	We need an area outside of the Sage Creek Camp Group for young children to have a play area to ride their OHV, we need 5 to 10 acres for this. Also the Ben Bow area needs remain open riding area as it is now!	
<p>Response: The 1987 Beartooth Ranger District Travel Management Plan identified two areas where cross-country motorized vehicle travel was permitted, which are typically referred to as the Benbow and Picket Pin/Iron Mountain areas.</p> <p>The 2001 Tri-State OHV Decision amended “the nine forest plans listed in Table 1.1 and establishes a new standard that restricts yearlong, wheeled motorized cross-country travel, where it is not already restricted.” Table 1.1 identifies the Custer National Forest 1987 Forest Plan. (The Forest Plan included original language that prohibited cross-country vehicle travel.) The 2001 Tri-State OHV Decision states that, “the actual application of the decision will be through activities on each of the Forests and Grasslands affected. This will include a CFR order signed by each Forest/Grassland supervisor eliminating cross country vehicle travel.”</p> <p>The Forest Supervisor signed Forest Order No. 01-08-01 in response to the 2001 Tri-State OHV Decision. The Forest Order prohibited motorized cross-country vehicle travel.</p> <p>Because the 2001 Tri-State OHV Decision and the Forest Order prohibit cross-country vehicle travel on the Custer National Forest and no exemption was made for the Benbow and Picket Pin/Iron Mountain areas, there are no current motorized cross-country vehicle areas on the Beartooth District.</p> <p>Given the above information, to designate a motorized cross-country vehicle area on the Beartooth District, the District/Forest would need to propose and analyze any areas prior to designation.</p> <p>The preamble to the 2005 Motorized Travel Rule indicates that designated areas “would have natural resource characteristics that are suitable for motorized vehicle use or would be so significantly altered by past actions that motor vehicle use might be appropriate.” The existing natural resource characteristics of both areas suggest that they are not suitable for motorized cross-country vehicle travel (i.e. area designation), including: the presence of Yellowstone cutthroat trout (a sensitive, management indicator, and key species), perennial streams, cultural resources, alpine vegetation, riparian zones, and endangered species habitat. These areas were not formerly “significantly altered by past actions”, including mining, vegetation management, natural disasters, or other activities such that they are suitable for motorized cross-country vehicle travel.</p>		

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Subject: Recreation		Response #: R-16, Route #2308B (Dry Head)
Letter-Comment #: 129-35	The Forest’s proposal to close the Dryhead Loop route (32308B) Alternative B would be a good modification of alternative C. The Cultural reasons are compelling.	
281-1	I support Alternative C but with the following improvements. In Alternative B seasonal closures as proposed are well selected. This proposal from Alt. B would be a good addition to Alt. C on routes open to motorized use. Another one of the improvements that need to be made to Alt. C is the closure of Road #2088 to use of motorized traffic west of Crater Ice Cave. This route should be converted to a non-motorized trail to the west of Crater Ice Cave. I would also like to see the closure of Dryhead Loop route #2308B included in Alt. C for culture reasons.	
288-9	We urge the Forest's closure of the Dryhead Loop route (#2308B) in Alternative B, and would like that same closure in Alternative C. The cultural reasons are compelling.	
334-1	Your choice of Alternative B here has too many roads for vehicles; we really don't need to drive everywhere. The Alternative C would be a better choice to save the out back type of environment, even though it retains the short loop road 2308B, at the Dry Head Overlook; this short road should not be abandoned as you show in Alt. B. The overlook is one the main attractions of the Pryors.	
Response: Alternatives B and B Modified in the FEIS propose that Road #2308B not be designated for public motorized use to address cultural resource concerns. Alternatives A and C propose designating the route for public motorized use. The route would be available for public motorized use under the No Action Alternative.		

SAFETY

Subject: Safety		Response #: SA-1, Congestion
Letter-Comment #: 66-29	There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be adequately addressed.	
66-77	The management trend of closure after closure is concentrating recreationists into smaller and smaller areas. The cumulative negative impact of the closure trend will either produce more impact than allowing use of the existing roads and trails or squeeze us completely out from public lands. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be acknowledged and adequately addressed. We also request that the trend of wholesale closures be reversed so that public land can be managed using the most sound natural and human environmental principles.	
74-5	The action of closing existing trails (both on and off Alternative A) would cause more erosion and safety problems by creating heavier use on the remaining trails.	
75-2	Please do not close any trails in the Beartooths, it simply cause more congestion in other areas that remain open, which is dangerous	
Summary of Comments: Reducing the number of motorized routes will increase congestion on remaining routes.		
Response: There is insufficient existing information to determine if the action alternatives would have substantive, specific effects on motorized recreation congestion. The number of miles of motorized routes for each alternative can indicate if there is any <i>potential</i> for the alternative to have effects related to congestion relative to the No Action Alternative. Based on miles of motorized routes, Alternative A (341 miles) has <i>potential</i> to reduce congestion related impacts, Alternative C (198 miles) has <i>potential</i> to increase congestion related impacts, and Alternative B (261 miles) and B Modified (267 miles) are not likely to change congestion conditions relative to the No Action Alternative (287 miles). See the Recreation section of Chapter 3 for more detailed discussion of this subject.		

Subject: Safety		Response #: SA-2, Mixed Use
Letter-Comment #: 68-33	Children are more apt to have ATV accidents, to drive off road and to behave in a manner that is dangerous to others. . .Children, young teens, are more likely to drive off designated roads. I disagree with the Forest Service assessment that designating roads for motorized mixed use would be a low risk to public safety, page 3-192	
461-69	The DEIS states, “[a]n engineering analysis has not been completed for the roads designated for motorized mixed use in each alternative. The engineering analysis would be completed	

Subject: Safety	Response #: SA-2, Mixed Use
	once the decision has been made to designate for motorized mixed use,” (p. 3-191). It would seem that in order to properly evaluate potential user conflicts, and the potential for injury, the engineering analysis would be needed during the NEPA process, not once a the decision is made. We urge that before designating any mixed use roads, that an engineering analysis be completed and incorporated into the environmental analysis.
Response: An engineering mixed use analysis is complete (see project record) and is incorporated into the Record of Decision.	

Subject: Safety	Response #: SA-3, Road, Motorized Trail and State Law
Letter-Comment #: 68-35	What specifically do I want the Forest Service to do? Not to provide a trail system for underaged drivers.
163-6	The underage driver provision is a concern for public safety reasons. A 12 year old who's passed a safety course is quite different from a five year old who hasn't. Yes, I have seen a five year old driving a small ATV. Do not allow drivers on Forest roads, trails, travelways or whatever who do not meet state standards of age, safety certification and adult presence.
262-4	All motorized vehicles licensed and driven by licensed drivers only on roads and designated trails. Why should this be any different on the Forest than our other public streets and roads? Our safety is still at stake.
268-4	All motorized vehicles driven by licensed drivers only on roads and designated trails.
307-4	Allowing under-aged drivers on public land would be a tremendous safety hazard both to the drivers as well as the public.
307-6	Allowing uninsured vehicles on Forest Service routes is lawsuit waiting to happen.
382-1	Any changes to the existing Off Road Vehicle laws or regulations either implicit or explicit, that would result in children under the age of 16 operating off road vehicles in areas where such actions are now prohibited will result in increases in the deaths and injures of said children.
386-21	Another issue that is not discussed much in the '07 DEIS is the designation of roads as motor vehicle trails. Supposedly, this innocent change in designation would allow less cost to FS road management. But the real impact comes in allowing unlicensed drivers and unlicensed vehicles. (This kind of sleight of hand by the CNF is historically what ruins trust by the public). Why would the CNF promote such liability and increased hazard?
406-7	I reference this web site about minors riding OHV's/ATVs' (http://atvsafetynet.org/news.php?page=pr) and want CNF to study it before making any more decisions. It will be obvious why I'm so displeased and objectionable to CNF's creative attempt to circumvent the Montana state laws.
415-1	I am deeply disturbed by the changes Custer National Forest (CNF) is proposing in vehicle and driver licensing requirements, and I am astonished by CNF's apparent perception that these are minor or inconsequential changes. Not all of these changes are adequately disclosed in the DEIS, and when they are, inadequate and irrelevant explanations are given. None of these changes have their consequences adequately analyzed.
415-2	A. Clear disclose the proposed action. B. Thoroughly analyze both the positive and negative consequences of the proposed action. C. Carefully explain the legal authority for the proposed action either under Montana Motor Vehicle Law, or the legal authority for not applying Montana law.
415-3	The DEIS clearly discloses the proposal to allow unlicensed vehicles. The DEIS fairly adequately, although minimally, discloses the proposal to allow underage drivers (12 to 16)....Since no action allowing VERY underage drivers was disclosed in the DEIS, the consequences of such an action were not analyzed. The comments above regarding underage drivers of course apply - but much more emphatically....There is nothing in the mission of the USFS that suggests any reason to "provide motorized recreational opportunities" for 7 year olds.
415-4	According to the above quotations from the DEIS unlicensed vehicles will be illegal on all roads and motorized trails on the Forest including those on the MVUM where the first

Chapter 5: Response to Comments

Subject: Safety		Response #: SA-3, Road, Motorized Trail and State Law
	quotation above will be printed. How can the Forest claim they will "not deviate from State law" and still allow unlicensed vehicles in violation of State law under which "the vehicle must be registered with a valid license plate"?	
415-5	Allowing VERY underage drivers (under 12 years old) would be a blatant violation of Montana State traffic law.	
415-6	Furthermore CNF needs to explain the legal authority by which "motorized trails" escape State law. If State traffic law does not apply then what traffic law does apply on "motorized trails"?	
418-7	What earthly good can be accomplished by allowing unlicensed drivers and vehicles on the Forest? For public safety, CNF should clearly state underage driving will not be allowed.	
461-71	In addition, the Custer NF asserts that Montana traffic laws do not apply to Forest Service trails. We question this assertion. Motorized trails open to all motorized use may fit within the definition of a "public highway." This is especially true given that Montana state law states that a "way of the state open to the public" is "any highway, road, alley, lane, parking area, or other public or private place adapted and fitted for public travel that is in common use by the public." MCA Sec. 61-8-101(1).	
Summary of Comments: Concerned the Forest Service is not following State Laws related to licensing requirements by designating motorized trails.		
Response: The Forest Service defers to State Law in regard to operation of vehicles on roads and trails. State laws related to roads fall under: <i>Montana Code Annotated, Title 61. Motor Vehicles</i> . State laws related to trails fall under: <i>Montana Code Annotated, Title 23 Parks, Recreation, Sports, and Gambling, Chapter 2 Recreation</i> .		
The Forest Service believes that both motorized roads and trails are legitimate and appropriate uses of the national forests. The travel planning process was designed to analyze the effects of all modes of travel, compare the relative merits and trade-offs of reasonable alternatives and ultimately determine where the opportunities for those uses could be provided. The Record of Decision documents the Forest Supervisor's conclusions about the various issues and the rationale for making his choice for a Travel Management Plan.		

Subject: Safety		Response #: SA-4, Emergency Access
Letter-Comment #: 421-8	Due to the inevitability of accidents and emergencies such as fires and human injuries, it is important to have allowable trails, roads, and access points for safety.	
Response: This concern was taken into account in all action alternatives. In addition, administration considerations were made when determining which routes remain for administrative use.		

SEASON OF USE

Subject: Season of Use		Response #: SOU-1, Pryor Unit
Letter-Comment #: 30-3	If Alternative B is chosen would a possible June 1st opening for seasonal roads and trails be considered.	
31-3	Proposal A already has a lot of road less area in it. The trails should also be open June 1st. The forest service information states this would be the time of the least damage. Waiting until June 15th gives us two less weeks of riding a summer.	
66-148	We suggest that the number of different closures periods should be kept to a maximum of two, if possible, in order to avoid confusion and resulting misunderstandings.	
66-158	Implement seasonal closures, where required, with input and review by OHV recreationists that will: (1) provide the maximum amount of OHV recreational opportunity during the summer recreation season in order to disperse all forms of trail use and thus minimize impacts to trail users; (2) provide winter OHV recreation opportunities in low-elevation areas that are not critical winter game range; (3) provide OHV recreation and access during hunting season by keeping major roads and OHV loops open while closing spur roads and trails necessary to provide reasonable protection of game populations and a reasonable hunting experience; and (4) provide OHV recreation opportunities during spring months in all areas where erosion and wildlife calving conditions reasonably allow.	
66-159	The number of different closures periods should be kept to a maximum of two, if possible, in	

Subject: Season of Use	Response #: SOU-1, Pryor Unit
	order to avoid confusion and resulting misunderstandings.
67-10	Seasons of use. If conditions warrant, there should be some flexibility to extend or reduce the season otherwise the most conservative dates are chosen and the public loses access for a significant amount of the year.
68-6	The Forest Service lacks the data to make decisions on seasons of road closure in the Pryors. The Forest Service has no data on snow pack, snow melt, precipitation for the Pryors except two years of precipitation data at Gooseberry Hollow collected after the Red Waffle Fire. The RAW Station, Wild Horse, at extreme northwest corner of the PMWHR was pulled out perhaps in the 1980's Extrapolating data from the Beartooths and Bighorns to substitute for the Pryors leads to erroneous assumptions. The extrapolated data used to determine season of use is not presented in the DEIS.
68-8	Recommendation: For Pryor Mountain Road, 2308, from junction with Crooked Creek Road to the PMWHR and for the Commissary Ridge Road, 2092, open on 25 May each year to have the roads open by Memorial Day weekend. My recommendation for the section of Pryor Mountain Road 2308 from Dryhead Vista to the PMWHR is to open the road on 25 May each spring to be consistent with rest of 2308. Indicate the designated roadbed. Post a warning that when wet or covered with snow the road may be impassible. Warn that drivers must stay on designated road.
68-9	My concern is that prior to the melting of the Jove's Ravine snowdrift people try to circumvent the drift by driving off road to the south. As they do so, they not only tear up the road embankment but also drive over <i>R. jovis</i> plants, which are still on the Forest Service's list of sensitive plants. Closing the 2308 until 25 May each year will eliminate this circumvention.
68-12	Because there is no justifiable reason to keep this section of 2308 closed after May each year, the Forest Service will have many people unhappy with Forest Service Rules.
68-13	Pryor Mountain Road from Dryhead Vista to the PMWHR: Often the roadbed is not evident so people drive in one of the many parallel roads. The advantage of closing the road until June 15 is that by then the roadbed is evident. However, because of the sponge like nature of the soil, the road can become mucky anytime it rains. This forested section does get more precipitation. As the roadbed dries, the ruts harden and remain. The end result is that the road throughout the summer is deeply rutted and difficult to drive until the edges of the ruts are beaten down in August after a long dry spell. The road is always going to be deeply rutted; that is the nature of the soil. Keeping this road closed even past 15 June will not prevent the muckiness and deep rutting.
68-17	Commissary Ridge Road: By the time the Jove's Ravine snowdrift has melted, the road down Commissary Ridge is free of snow. No snowdrifts accumulate on this portion of the Commissary Ridge road... There has been no damage to the roadbed over the years and no parallel roads. By Pryors standards it is a very good road that holds up well without maintenance. The road down Commissary Ridge can be opened by 25 May.
68-19	It makes sense to extend the seasonal closure of the roads to the end of hunting season. Even during hunting season with the early snowstorms and freeze-thaw the higher elevation roads become too muddy to be traveled.
68-23	If kept open, Island Ridge road should be open June 15 through April 1 as proposed in Alternative B. This would allow the road to dry and Commissary Creek to recede before vehicular traffic is allowed.
74-3	The Pryors have a drier climate and trails should only be closed in March and April for the snow melt. Yet, the Alternative B for the Pryors closes trails for snow melt/run off until June 15, based upon conditions in areas that are much different than the Pryors.
97-8	Most roads in the Pryors do not require closure from April 15 through June 15th. Historical information will prove that snow melt occurs mostly from the first part of April till the mid to the end of May. After May 1st there is little to no rain, other than very brief showers.
124-16	The seasonal closures (April 15 to June 15) are too short to protect vegetation resources. This should be changed to December 1 to July 1.
129-8	The seasonal closures as proposed in alternative B are mostly well selected (except for those routes which we do not believe should be motorized at all). The resource protection value of these restrictions is high. One exception is that the seasonal closure on Stockman Trail (#2850) should extend 1/4 mile south of the junction with trail #2492 due to the braided Stockman Trail

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Subject: Season of Use	Response #: SOU-1, Pryor Unit
	caused by earlier abuse.
129-9	The short two-month closure (April 15 to June 15) is insufficient to protect the resource. The seasonal closures should be from December 1 to July 1 as proposed in the Forest's 2004 proposal.
129-33	2. The seasonal closures as proposed in alternative B are mostly well selected. These would be a good addition to Alternative C on these routes that are open to motorized use. The resource protection value of these restrictions is high. One exception is that the seasonal closure on Stockman Trail (#2850) should extend ¼ mile south of the junction with #2492 due to the braided Stockman Trail caused by earlier abuse. The short two-month closure (April 15-June 15) is insufficient to protect the resource. The seasonal closures should be from December 1 to July 1 as proposed in the Forest's 2004 proposal....The damage was caused by motorized abuse of a muddy road in early March. This shows that the seasonal closures should begin long before April 15.
132-3	Closing the trails from April 15 to June 15 is unrealistic. With our weather pattern, most snow is gone by the end of April or first part of May.
133-2	And closing trails from April 15 to June 15 is also unnecessary.
155-7	I feel seasonal restrictions being proposed under Alternative B are excessive for the Pryor range. Both these mountain ranges exhibit different patterns of how and when precipitation is garnered thru the year and I don't feel information gained from these sites can accurately predict what happens in the Pryor Range.
155-8	I feel a better alternative to this proposal would be closure from April 1st to May 20th which would in my personal opinion would give the mountain range plenty of time to dry out sensitive areas and also give the motorized community more of the prime time of spring to enjoy recreational opportunities.
156-4	I support the recommendation made by the Treasure State ATV for the dates to be changed to April 1st to May 20th. Weather and precipitation patterns have indicated these earlier dates would still allow the range to dry out, thus lessening the possibility of damage, while providing the motorized community a chance to enjoy the spring season of riding.
158-9	Please consider changing seasonal closure April 1st to May 20th as proposed by the Treasure State ATV rather than closures April 15th to June 15th.
161-39	Alternative B, Agency preferred alternative, opens high elevation roads in the Pryors from 6/15 to 4/14. (Table 2-3, pg.2-15). The document also stipulates in the Table 2-6 on page 2-19, open dates of 6/15 to 12/1, for the 60 miles of Pryor High Elevation Roads and trails. Thus, there appears to be a conflict in the Timing Restrictions presented in the DEIS. I personally favor 6/15 to 12/1 open dates. Following the review of the responses, this difference must be sorted out. Closing roads from 4/15 to 6/15, for the rationale given in the DEIS, is totally unrealistic and unacceptable.
161-4	The normal wet season, for the upper elevations in the Pryor's, is November through June. This is the period when the roads are most vulnerable to damage by rutting and by "user created" by-passes of snow drifts or wet pot holes.
161-5	Sage Creek #2308, and Crooked Creek #2085...the closure location should be at lower elevations on these main roads.
163-16	Seasonal closures are an improvement but they should last from the first of Dec to the end of May.
191-4	Seasonal closures should be from December 1 to July 1 to allow muddy conditions to dry and to keep drivers from going around snowdrifts, creating more muddy tire tracks.
262-3	Closure of the seasonal trails when actually affected by the muddy season. Over the years, this period of time has started earlier in the winter and spring due to the warmer temperatures. Please reconsider the dates from April 15 to June 15 to December 1 to July 1. These dates more accurately fit the true "muddy season" and comply with the Forests' 2004 proposal.
268-3	Closure of the roads when affected by the muddy season. Over the years, this period of time has started earlier in the winter and spring due to the warmer temperature. Please reconsider the dates of these road closures to fit the true "muddy season" and to avoid more off-road scars.
273-2	I would also suggest that the seasonal closures proposed in Alternative B be added to Alternative C, and modified to meet the 2004 timeframes (December 1st to July 1st). April 15th is too late to protect the area, with the warmer and rainier winters & springs we have.

Subject: Season of Use	Response #: SOU-1, Pryor Unit
	ATV's do not belong in those areas until July.
288-8	The seasonal closures as proposed in alternative B are well selected. These would be a good addition to Alternative C on those routes that are open to motorized use. The resource protection value of these restrictions is high. The short two month closure (April 15 to June 15) is, however, insufficient to protect the resource. The seasonal closures should be from December 1 to July 1 as in the Forest's 2004 proposal.
307-23	Season of closure might best be addressed on a road-by-road basis. Different roads open up and dry out at different times of the spring. Likewise roads become snow covered and impassable at different times in the fall. All roads should be closed until they are snow free and dry to minimize the negative impacts of parallel roads and ruts in attempts to avoid snow banks and wet areas.
396-15	In most areas though, the length of the motorized season should remain as it currently is. The past several years of drought have made a April 1st opening of most trails to motorized use very reasonable. The Forest Service should exercise a flexible decision on motorized trail openings based on a year by year basis, depending on trail conditions. The end of the motorized season is currently dictated by the first significant snowfall which automatically eliminates motorcycles from the trails. In most cases, to close the motorized trails before the 1st winter storm provides for too short of a season. August, September, October, and part of November are usually excellent times for motorized use because the snow banks have receded and the summer weather patterns generally create relatively dry trail conditions. In most years, by the opening of rifle hunting season, it is either too cold or the snow levels have dropped far enough to almost eliminate motorcycle use on the trails anyway.
404-3	Something I have noticed in my three years going to the Pryors is how badly road 2308 is torn up between the Crooked Creek Road junction and the wild horse range boundary, especially between Big Ice Cave and the wild horse range boundary. From my observations, people get past the long-lasting snow banks and muddy conditions of the road by going around them. The road has thus become rough and wide. A seasonal closure may help alleviate this, but I am not so sure that it would keep everyone off the road unless there was thorough enforcement of the closures.
406-13	Last but not least, the seasonal closure in Alt. B is a move in the right direction and I applaud you for having the strength to do what is best for the resource. However, on the ground evidence shows a need to expand the closure southward 1/4 to 1/2 mile along the Stockman trail #2850 beyond the junction with #2492. Also, evidence points to the seasonal closure dates in the 2004 proposal of Dec 1 to July 1 as being more appropriate toward truly protecting the resources, especially in the Pryor Mountains. The District Ranger can close later or open earlier on a year by year basis.
412-6	The designated season of use in the Pryor Area of June 15 - April 15 is not well researched and ill founded. Since this season of use is meant to limit damage incurred on trails while they are muddy and soft this is the improper time span. And since the Pryor Mountain soil is generally only vulnerable to rutting when saturated with snow runoff and early spring rains, the season of use needs to reflect this time span more appropriately. The proper season of use should be May 1st thru March 1st.
419-2	As for seasonal closing I have found that the proposed plan of April 15th to June 15th closure of the many trails does not reflect the conditions that exist in the Pryors....I would recommend the trail closures run from the first of April until mid May with the dates being flexible as conditions change from year to year.
420-2	It is our understanding that snow melt data was gathered using Snotel sites in the Bighorn and Beartooth Mountains. As far as we know, there is no Snotel site in the Pryor Mountains and that information from other Snotel sites was used in the Pryor Mountains seasonal closure decision process. Average snow falls, ground snow levels, and spring melting patterns in the Pryors are very different than either the Big Horns or the Beartooths. Members of the TSATV are very familiar with the Pryor Mountains and when visitation is prudent and when it is not. Based on this experience, we recommend changing the April 15-June 15 seasonal closure period to April 1-May 20. This change would help both OHV and non-OHV users access to favorite areas after May 20th.
421-31	At this time the DEIS is proposing for winter closures to be from March through June 1st, this

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Subject: Season of Use	Response #: SOU-1, Pryor Unit
	is based on the weather conditions in the Beartooth. The Beartooth has very different weather patterns than the Pryors do. ... A much more appropriate time frame would be April 1st through May 15th. ...Memorial Day Weekend all areas should be open for use.
421-32	In the Beartooth's there should be no seasonal closures because the road base is rock and it can handle the wet travel. Pickett Pen Road up to Iron Mountain should remain open. No seasonal closures because the road base is rock. Trail #'s 2092, 2093, 2144, 2091, 2088, 2095, 2850 and start of the Y of 2012, 2814 above the Y closed for seasonal uses. If there are other problems we should address by coming together and having a special order and the barricades to close until which time when it can be used. All other trails left open with no restrictions because the road base can handle all weather conditions for traveling. ...would like no seasonal restrictions on road 2140 Iron Mountain or Picket Pen.
425-16	<u>The seasonal closures</u> suggested in Alternative B are acceptable and these should be incorporated into Alternative C for those motorized routes, which are open in Alternative C.
427-2	Seasonal closures from April 15th to June 15th is not acceptable. Prefer that it be April 1 to May 20th only. This is used almost every year during Memorial Day.
431-2	I support seasonal closures April 1st to May 20th. Trail 2091 to 2095A I believe it should be open all year I enjoy going in different weather spring summer & winter. The same answer for 2088 trail.
438-5	Seasonal restrictions proposed under the preferred alternative are excessive for the Pryor Range. Information explaining what study/studies used for rationale and how they apply to the site-specific resource conditions in the Pryor's is not apparent. Internal reports and studies, including prior NEPA analysis that are relevant to the site-specific conditions in the area are important resource and should be identified.
438-7	Seasonal closure on this trail as well as others in the vicinity should be held to April 1st until May 20th.
445-4	Another important issue is seasonal closure. While some roads (probably not enough) are closed for seasonal use (or only open for some use) that is not part of alternative C. It must be included. Much of the damage to the fragile Pryors landscape is done in the spring months when the ground is wet and vulnerable to damage by most types of travel into effect? How are you going to enforce the rule?
467-10	We recommend that the higher elevation segments of major travelways of Miller Trail/Stockman Trail/Red Pryor Divide Road be used for motorized recreation only if it can be limited to dry road conditions.
489-3	If seasonal closures are required, then I would like to see the closure period to be from April 1 to May 20th, instead. The reason for this is that the data for the water and moisture for the area was taken from Snotel and data in areas that are much different than the Pryor areas due to lack of Snotel data in the Pryors exactly. Due to the more arid temperatures in this area, the road closures recommended in your alternative B are often not having a problem with any moisture and mud erosions.
490-3	If seasonal closures are required, then I would like to see the closure period to be from April 1 to May 20th, instead. The reason for this is that the data for the water and moisture for the area was taken from Snotel and data in areas that are much different than the Pryor areas due to lack of Snotel data in the Pryors exactly. Due to the more arid temperatures in this area, the road closures recommended in your alternative B are often not having a problem with any moisture and mud erosions.
510-1	The seasonal road closure in the Pryor Mtns would affect all of bear season... It would also affect access to pole permittees on Stevens Hill... Seasonal closures would limit access to 15 days... I disagree with any seasonal road closures.
<p>Summary of Comments: Numerous comments expressed concern over the seasons of use (SOU) proposed in the DEIS, and specifically those proposed for the Pryor Mountain Unit. Some comments request a longer SOU, while other comments requested a shorter SOU. Some comments urged flexibility in implementing a SOU based on current year's climate; while some comments requested that all routes remain open all year or for consideration during bear hunting season. A number of comments questioned the data and rationale for establishing the SOU.</p>	
<p>Response: The Season of Use proposed for the Pryor Mountain Unit was initially based on analysis of SNOTEL data from 15 sites. The dates suggested by this analysis were then adjusted based on landform aspect and consideration of timing with the spring bear hunting season. Under Alternatives B and B Modified, respectively, motorized use on</p>	

Subject: Season of Use	Response #: SOU-1, Pryor Unit
designated routes during spring bear hunting season in the Pryor Mountains could occur on 62 out of 122 miles (51%) and 66 out of 124 miles (53%). Under Alternative C, motorized use on designated routes during spring bear hunting season in the Pryor Mountains could occur on 59 out of 78 miles (76%). Motorized use on designated routes during spring bear hunting season in the Pryor Mountains could occur on all designated routes under Alternative A and No Action. A detailed description of this analysis can be found in Appendix F.	

Subject: Season of Use	Response #: SOU-2, Picket Pin
Letter-Comment #: 421-32	In the Beartooth’s there should be no seasonal closures because the road base is rock and it can handle the wet travel. Pickett Pen Road up to Iron Mountain should remain open. No seasonal closures because the road base is rock. Trail #'s 2092, 2093, 2144, 2091, 2088, 2095, 2850 and start of the Y of 2012, 2814 above the Y closed for seasonal uses. If there are other problems we should address by coming together and having a special order and the barricades to close until which time when it can be used. All other trails left open with no restrictions because the road base can handle all weather conditions for traveling. ...would like no seasonal restrictions on road 2140 Iron Mountain or Picket Pen.
Response: After further review and in consultation with the Gallatin National Forest, Route #2140 Picket Pin Road on the Custer National Forest will have a yearlong season of use designated for motorized use in the preferred Alternative B Modified in the FEIS.	

Subject: Season of Use	Response #: SOU-3, Red Lodge Creek
Letter-Comment #: 161-6	Red Lodge Creek Road #2141; The route should be closed to vehicles, except over the snow vehicles, from 12/1 to 6/1, because of potential damage to the road surface and potential conflicts with X-Country Skiing and snowmobile use.
Response: Route #2141 season of use for minimizing impacts during spring thaw is addressed in Alternatives B, and B Modified. Portions of the route remain open for private land ingress and egress, and would also be designated for public motorized use.	

Subject: Season of Use	Response #: SOU-4, Campgrounds
Letter-Comment #: 67-2	A season of use designation of May 15 to September 30 would be placed on all roads within the ten currently gated developed campgrounds.” Why so early? September 30 is too early to close grounds.
Response: September 30 accommodates seasonal closing of campground infrastructure including water, garbage, latrine, and concessionaire services. It also helps reduce vandalism.	

SOILS

Subject: Soils	Response #: S-1, Soil Crusts
Letter-Comment #: 41-3	The fact that you do not even mention cryptogamic or crytobiotic soil under your soil section leaves questions for the reader about the thoroughness of this DEIS. Crytogamic soils are very important for reducing soil erosion in dry environments of the west and they are present in the Pryor's. The plan needs to address the destruction and monitoring of cryptogamic soils as many USFS areas in the southwest already do.
129-27	We saw no mention of crytobiotic soils in the Forest’s analysis. What does the Forest inventory The Pryors Coalition show of such soils in the Pryors and the potential of Travel Plan alternatives to impact them?
205-1	If the USFS chooses plan B, I believe that the biological soils crusts in the Pryors will be irreparably damaged. The damage will increase the level of erosion and soil stability, will decrease the ability for seedling germination, and will decrease or halt plant growth.
205-4	I believe that no matter what we do as a community to protect the Pryor's, many people will take it upon themselves to drive wherever they wish. So, if we make it harder for them to access the area, it will make it that much harder for them to damage the biological soil crusts.
418-2	Cryptogamic soils should be considered.
425-10	More seriously, there is no mention of discussion of the issue of crytobiotic soils in the soils

Chapter 5: Response to Comments

Subject: Soils		Response #: S-1, Soil Crusts
		section of the DEIS. Is this due to a lack of knowledge of these problem soils or a decision to not include them to avoid a discussion of the impacts of such soil problems.
461-74		The DEIS provided a good list of the Erosion Risk Ratings for the Land Type Associations across the planning area. Table 3-28 titled, "Route Miles by Erosion Hazard Rating by Alternative" lists the erosion ranking for each alternative. The table did not differentiate between trails and roads, or provide a listing of the different trail classes and road maintenance levels. This information is necessary to adequately analyze the effects of the different alternatives. Finally, in order to adequately analyze soil impacts among the alternatives, the DEIS needs to identify cryptobiotic soils in the planning area and detail how these fragile soils will be protected.
Summary of Comments: What is the impact of travel management on soil crusts?		
<p>Response: Information on soil crusts distribution and extent in the area is generally lacking. There are no references to soil crusts in the Carbon Count Soil Survey for the Pryor Mountains area. The NRCS Soils State Office in Bozeman was contacted and at this time they have no knowledge of any studies that may have taken place in Montana and Wyoming on the distribution and extent of soil crusts and/or cryptobiotic soil crusts in the project area (Personal Communication Jane Karinen, NRCS State Office Bozeman, MT).</p> <p>Soil crusts most likely do not occur on roads and trails due to existing conditions. Off-road travel by motor vehicle is currently prohibited except for dispersed camping within 300 feet of the road. The majority of dispersed camp sites are currently used and have some level of disturbance. These sites are most likely not located in the dryer open areas in the area but are more generally found in areas with higher vegetative cover and some shade. Off-trail travel (i.e. "bushwacking") by stock and foot travel could have a negative impact on soil crusts where they exist.</p> <p>Soil crusts probably do exist in the project area though the extent and distribution are not well known. There will be impacts to soil crusts mainly due to off-trail travel by stock and foot travel. Impacts to soil crusts from motor vehicle traffic should be minimal.</p>		

Subject: Soils		Response #: S-2, Erosion Hazard Rating
Letter-Comment #: 40-1		We still believe, however, that the preferred alternative should be modified to include further reductions in motorized routes, particularly routes in areas with high hazard (erosive) soils. The DEIS states that Alternative B would include 15.9 miles of public motor vehicle use and 49.3 miles of OHV use on high hazard rating soils. Alternative C, however, includes no such routes on high hazard soils. We believe additional reductions in motor vehicle and OHV route designations for high hazard soils should be included in the preferred alternative. At the very least improved rationale for having motor vehicle routes and OHV routes on high hazard soils with Alternative B should be proved that justifies designating motorized routes on high hazard soils.
461-38		In order to meet NEPA requirements for an adequate range of alternatives, one alternative needs to be developed that avoids and protects these soil types, in addition to mitigating the effects to soils with medium erosion risk ratings using proven mitigation techniques.
<p>Response: Erosion hazard ratings are based on multiple factors. Basically, erosion hazard for roads and trails is the hazard or risk of soil loss from unsurfaced roads/trails. These ratings do not mean that management should not occur on soils with a specific rating but rather what types of mitigation and management may be needed to minimize the impact. For example, roads and trails with a high erosion hazard may require more frequent maintenance and higher cost erosion control methods. These ratings were determined by categorizing a whole map unit by the most restrictive rating in that map unit. If some map units had soils that had ratings completely different from each other (i.e. one had a high erosion hazard rating and one had a low erosion hazard rating) the map unit was given the rating that was considered most restrictive. In most cases, many of the landtype and soil units will actually have different ratings for the individual soils but since these components are not mapped separately the effect can not be disaggregated and displayed. Again, this is a rating based on the most restrictive hazard and it is the potential of the map unit, not necessarily the actual site that contains the routes.</p> <p>It would not be feasible to have an alternative that completely eliminates all roads and trails from landscapes with a high erosion hazard rating as it would be impossible to provide the necessary access for recreation, administration, and protection of the District.</p>		

Subject: Soils		Response #: S-2, Erosion Hazard Rating
Please see soils specialist report and FEIS Chapter 3, Soils section for additional discussion on soil erosion hazard ratings.		

Subject: Soils		Response #: S-3, Episodic Events
Letter-Comment #: 66-19	A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes fires. The recent fire in the Custer National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years.	
Response: NEPA requires a comparison of action alternatives to the no action alternative, not to episodic events.		

Subject: Soils		Response #: S-4, Route #2492 (Bear Canyon)
Letter-Comment #: 68-26	The roads up from Bear Canyon may have to be closed in the future because of erosion. My recommendation is to close these roads now to wheeled vehicles. These two roads would make excellent horse trails.	
441-2	Bear Canyon Road #2492 should be converted to non-motorized use because it is located in a sensitive riparian area at high risk for irreparable damage from motorized use.	
Response: Road 2492 is on a ridgeline, and road #24921 is in the riparian area. Both roads are proposed in the FEIS Alternative B Modified to not be designated for motorized use.		

Subject: Soils		Response #: S-5, Productive Land Base
Letter-Comment #: 461-36	Of particular concern is the preferred alternative's designation of non-system routes to motorized trails open to all motor vehicles. In order to meet NEPA's requirement to take a hard look at potential impacts, a site specific analysis for how each of these additions will impact the planning unit soil productivity is necessary. In order to adequately comment on all non-system additions, they should be illustrated on a map with the soil types and erosion rankings.	
Response: The planning unit for this analysis is the Beartooth District. If non-system roads and trails are added to the system those roads and trails will be considered removed from the productive land base. If non-system roads and trails are not designated for motorize vehicle use, those roads and trails will be restricted to non-motorized use and could eventually return to productive capability. Depending on if restoration opportunities are completed, the time frame for return to productive capability will be quicker than without restoration activities. Each alternative displays the amount of non-system roads that were analyzed for designation for motor vehicle use. Information on soils, soil maps, and other information used in the analysis is located in the project file.		

Subject: Soils		Response #: S-6, Separate Beartooth and Pryors
Letter-Comment #: 124-19	These data should be split out and presented on two separate tables, one for the Pryors and one for the Beartooth unit.	
Response: Data needs and their analysis are different for each resource area. Where splitting the data between the two units made sense for the analysis the resource specialist conducted the analysis separately. For the FEIS the soils analysis was evaluated separately for the Beartooths and Pryors. See Soils Specialist Report and FEIS Chapter 3 Soils Section.		

Subject: Soils		Response #: S-7, Options Available
Letter-Comment #: 425-9	It is incumbent that the Forest Service provide information to the public as to how you intend to curb or end use of roads located on high erodability soils-authorized or unauthorized-if your monitoring and evaluation determines any physical, biological or environmental adverse effects.	
Response: There are many options available to the deciding official on how to address specific resource concerns, such as season of use, temporary emergency closures, or addition of drainage structures. The exact option to be used should be dependent on the specific resource concern.		
The 2005 Travel Management Rule sets the stage for modifying motorized travel designations annually by requiring		

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Subject: Soils	Response #: S-7, Options Available
that new maps be printed every year that reflect any route changes identified since the last printing. There is no plan to revisit travel management planning on a District-wide scale again; rather annual adjustments would be made based on identification of adverse resource impacts.	

VEGETATION

Subject: Vegetation	Response #: V-1, Stock
Letter-Comment #: 95-2	I would like to further your restrictions to include all of the Beartooth Wilderness off limits to all horses and stock use. Water channels have formed in these horse ruts and further exasperate the problem thus degrading the trail and contaminating our streams with unnatural sediment loads during times of snow melt and surface run-off. ... It is well documented that stock animals area the number one importer of the noxious weed seeds. ... back country camping sites that have had horse/stock use have been 'girdled' and killed by repeatedly tying the animals to them, and the off setting riparian areas are riddled with deep hoof impressions and manure.
Response: Recreational stock may transport weed seed by carrying the seed in the hair, hooves, or digestive tract. They may also increase seed germination by reducing vegetation competition in areas of excessive grazing, girdling, and by ground disturbance in areas of excessive trailing. Weed seeds are also transported by wind and water, and wildfire provides seedbed conditions that enhance germination, establishment, and spread. The largest occurrence of the weed inventory on the Beartooth District occurs along major motorized transportation routes, trailheads, and in wildfire areas. Because many natural processes and motorized/non-motorized agents can continue to transport weeds and seed seeds, removing just recreational stock will not totally eliminate the spread of weeds. Weed management needs an optimal balance of use restriction, public education, implementation of best management practices, and effective treatment measures. The current Weed Seed Free Forage Order prohibits the possession or storage of hay, grain, straw, cubes, pelletized feed, or mulch that is not certified as being noxious weed free or noxious weed seed free by an authorized State Department of Agriculture official or designated county official; each individual bale or container must be tagged or marked as weed free and reference the written certification.	

Subject: Vegetation	Response #: V-2, Route #2088 (Shriver Peak)
Letter-Comment #: 386-17	Shriver Pk. Road (#2088) is a user-created extension into sensitive terrain that creates too much impact by motor vehicles. This entire road needs to be closed to motor vehicles to protect all resources.
Response: Impacts to vegetation settings are analyzed in FEIS Vegetation and Weeds section. A 2.2 mile portion of the route would not be designated for public motorized use in Alternative B Modified to reduce the potential for impacts to cultural resources. In addition, the route would have a season of use on it to reduce impacts to the route and adjacent resources during the spring snow break-up period.	

Subject: Vegetation	Response #: V-3, Irreversible/Irretrievable
Letter-Comment #: 163-2	How can designation of a road system/adjacent 300ft area be considered retrievable and reversible? Even if the funding were available, the political reality of attempting to close roads makes it, for all practical purposes, irreversible and irretrievable. Effects created by the road such as damage to cultural sites, spread of noxious weeds and erosion cannot be rolled back to the original condition by closing a mistakenly open road 10 years from now.
Response: The proposed actions have been evaluated for irreversible and irretrievable commitments of resources consistent with NEPA requirements and the definition of those terms in a NEPA context. Based on this, no irreversible commitments of renewable resources were identified. Roads and trails designated for public motorized use are considered irretrievable commitments as long as they remain designated routes.	

Subject: Vegetation	Response #: V-4, Long Term Productivity
Letter-Comment #: 136-6	Chapter 3, on page 3-4, heading 3.1.6, says that "Selection of any of the alternatives considered in this analysis is not expected to affect the long term productivity of the various resources within or adjacent to the project area." I do not believe that evidence presented in the DEIS supports that conclusion. One of the "resources" that I believe deserves close attention is the

Subject: Vegetation	Response #: V-4, Long Term Productivity
	tremendous diversity of plants and plant community types that is present in the Pryors.
136-7	Most of the evidence presented in the DEIS indicates clearly that the Alternative C is the better alternative for insuring the protection of what is really unique plant diversity in the study area and indeed in Montana. The concerns I am raising here are not often addressed or not adequately addressed by the treatment given in the DEIS. I do not find that the assertion that all of the alternatives offered in the DEIS can be expected to be neutral with respect to the "long term productivity of the various resources within or adjacent to the project area" is supported by a qualified scientist, by references to scientific works and models on this topic, or even by the facts presented in the DEIS.
Response: The FEIS will reflect the following clarification. In general, designation of routes would not affect the ability of the land to produce continuous supplies of Forest resources. However, selection of any of the action alternatives considered in this analysis could affect the long term productivity in a small area of the Beartooth District, as outlined in Chapter 3 of the EIS relative to soil, vegetation, water, fish, and wildlife. Designation of routes would take a relatively small area out of production for the sake of human use and enjoyment of public lands.	

Subject: Vegetation	Response #: V-5, Weeds
Letter-Comment #: 40-23	We encourage limiting motorized uses to designated roads and trails to reduce threat of weed spread, and limitations on motorized use in roadless areas, which are often reservoirs of native plants. The need to avoid the spread of weeds, provide further support for the selection of Alternative C.
68-5	The problem of proliferating weeds is reason enough to close more roads than the Forest Service has proposed closing in Alternative B...Slowing the introduction of weeds is an underlying reason to close those roads recommended for closure by the Pryors Coalition.
124-20	Under Alternative B 11,000 acres are shown as highly susceptible, whereas only 2,200 acres are highly susceptible under Alternative C. In view of the almost irreversible nature of noxious weed infestation, and projected increased use of the area, this alone should be reason enough to select Alternative C as the preferred Alternative.
266-2	To preserve this unique ecosystem the number of roads must be limited and motorized off-road use curtailed. Roads provide avenues for noxious weed infestations and soil erosion.
274-4	Alternative B is also insufficient for minimizing the spread of invasive species, reducing landscape fragmentation, and providing secure wildlife habitat.
416-4	All other issues aside the imminent threat of noxious weeds should be sufficient to convince CNF to designate only a very minimum number of motorized routes in the Pryors. Perhaps both Alternative C and the Pryors Coalition proposal have too many roads. In fact CNF should be taking emergency steps to stop motorized traffic on many routes in the Pryors BEFORE the new Travel Plan takes effect.
425-13	In your analysis in the Vegetation section apparently, five times as many acres in Alternative B are susceptible to noxious weed infestation than in Alternative C. This will require more funding and staff time for weed monitoring and treatment. If the needed weed control staff and funding are not available then it is probable that noxious weeds will infest significant areas of the Pryors.
487-2	Reducing the number of roads where motorized vehicles are allowed to travel will help concentrate weed infestation to more manageable locations.
505-3	In this consideration of closing or maintaining roads, why not incorporate the Forest Service's knowledge of weeds - the destructive nature, the difficulty of controlling, the relationship of roads to the spread of weeds? Surely the Forest Service is aware of the increasing expense of controlling the now present weeds in the Pryors.
Summary of Comments: Concern about the spread of noxious weeds.	
Response: Research has shown that motorized vehicles tend to have a greater capacity for spreading weeds than non-motorized travel. There should be reduced risk of impacts to ecosystems under Alternatives B, B Modified, and C and increased impacts under Alternative A. In comparison to the No Action Alternative, Alternative A increases motorized routes by 19%, Alternatives B and B Modified decreases motorized routes by 9% and 7%, respectively, and Alternative C decreases motorized routes by 31%.	
Weeds will continue to be spread as a result of motorized and non-motorized resource management, recreational use,	

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Subject: Vegetation	Response #: V-5, Weeds
<p>other human activities, wildlife, and natural processes. To reduce the effects of weed spread, the Forest Service will monitor routes for early detection of new weed patches and treat patches when they are still small. Weed treatments are more successful and less costly when the infestations are limited in size. The impacts of weed management were analyzed in the 2006 Custer National Forest Weed Management EIS and were incorporated into this analysis by reference.</p>	

Subject: Vegetation	Response #: V-6, Research Natural Areas
Letter-Comment #: 307-13	<p>The Forest Service is to be commended for closing Road 2009 to motorized vehicles. It currently allows motorized access to Trail #9. ATVs have not stopped at the end of the road, but have continued on up Trail #9, causing considerable damage to the trail. It is imperative that OHVs are not allowed to reach Line Creek Plateau. This is a fragile alpine area with a Research Natural Area designation and should be protected from vehicle damage.</p>
<p>Response: Motorized vehicle use is prohibited in Line Creek Plateau Resource Natural Areas per the 2000 EA and Decision Order.</p>	

Subject: Vegetation	Response #: V-7, Sensitive Plants (Shoshonea)
Letter-Comment #: 136-3	<p>My concern is that the DEIS makes shoshonea sound like it grows like commercial wheat: we have 155 acres covered by this plant that is rated G2/G3 and S1! This is a plant with exceptionally specific habitat requirements. It grows in a few small patches that are widely dispersed. Disruption to even one of these little patches is going to reduce the amount of shoshonea known to exist on the entire planet by a significant amount.</p>
<p>Response: All Forest Service sensitive plant species are categorized as having various aspects of rarity. There was no intent to diminish the importance of conserving these unique colonies and habitats. The project file for the sensitive plant analysis provides numerous background information which is not displayed at length in the DEIS, but was utilized as part of the overall analysis. You are correct that <i>Shoshonea pulvinata</i> is a narrow endemic with a global distribution limited to 12 occurrences associated with the Bighorn Basin area. Eight occurrences are located in Wyoming, in the eastern Absaroka Mountains and the Owl Creek Mountains; three of these occurrences are found on the Shoshone National Forest. Four occurrences are located in the Beartooth and Pryor mountains in south-central Montana. Occurrences are composed of mats that are comprised of hundreds or even thousands of individual plants. The total number of plants is estimated to be 210,000 in Wyoming and 12,000 in Montana. The Shoshonea colony on the Custer NF occurring in Big Pryor Mountain is on steep terrain and at least 1/2 mile away from any proposed designated motorized route. The Burnt Timber Road # 2849 bisects one population in the Lost Water Canyon colony but off-route motorized travel is typically restricted by steep terrain. The remaining Lost Water Canyon populations are greater than 300 feet away from motorized routes.</p>	

Subject: Vegetation	Response #: V-8, Season of Use (Jove's Ravine)
Letter-Comment #: 68-9	<p>My concern is that prior to the melting of the Jove's Ravine snowdrift people try to circumvent the drift by driving off road to the south. As they do so, they not only tear up the road embankment but also drive over <i>R. jovis</i> plants, which are still on the Forest Service's list of sensitive plants. Closing the 2308 until 25 May each year will eliminate this circumvention.</p>
<p>Response: Many respondents requested Memorial Day weekend be the beginning of the season of use for this and many other areas, rather than June 16. Further analysis of climate data, including snow-free periods and historic temperatures, was conducted. Alternative B Modified season of use in the FEIS responds to not only the new climate information, but also accommodates a Memorial Day weekend opening. Jove's buttercup, a Forest Service sensitive plant species, tends to grow in areas where snowbanks are receding in certain habitats, including areas along road 2308. Alternatives B and C season of use on road 2308 (includes the vicinity of Jove's Ravine) is from 6/15 to 4/15 and lessens vulnerability to impacts from drifts being circumvented by vehicles. Alternative B Modified season of use on road 2308 is 5/22 - 4/15 continues to lessen the vulnerability to impacts to Jove's Buttercup versus the yearlong season of use as analyzed in Alternative A and the No Action Alternative.</p>	

Subject: Vegetation		Response #: V-9, Sensitive Plants (Pryor Mountains)
Letter-Comment #: 192-1	This concentration of rare vegetation types, in combination with documented occurrences of rare plant species such as <i>Lesquerella lescii</i> (Pryor Mountain bladderpod) and <i>Shoshonea pulvinata</i> (shoshonea), highlight the significant biological diversity value of the Pryor Mountains.	
Response: You are correct that the Pryor Mountains are considered a botanical hotspot with high biological diversity value. All Forest Service sensitive plant species are categorized as having various aspects of rarity. There was no intent to diminish the importance of conserving these unique colonies and habitats. The project file for the sensitive plant analysis provides numerous background information which is not displayed at length in the DEIS, but was utilized as part of the overall analysis.		

Subject: Vegetation		Response #: V-10, Sensitive Plants (Beartooth and Pryor)
Letter-Comment #: 461-65	The DEIS concludes that, “[i]mplementation of any alternative would not be anticipated to move any sensitive plant species within the project area toward federal listing.” (DEIS p. 3-145). Unfortunately, the analysis only looked at the overall district and did not examine the Beartooth and Pryors Units separately. Since the Absoraka-Beartooth Wilderness constitutes such a large portion of the planning area, grouping the whole district together skews the analysis results. Even though the conclusion stated in the DEIS may remain the same, it is still necessary to evaluate the district by discrete units in order to properly determine cumulative effects and locate opportunities to minimize impacts as is required under the E.O.	
Response: The FEIS addresses both the Pryor and Beartooth Units of the Beartooth District relative to the sensitive plant analysis.		

Subject: Vegetation		Response #: V-11, Sensitive Plants (Goldenweed)
Letter-Comment #: 467-11	Beartooth Large-Flowered Goldenweed (S1S2, G4G5T2T3, USFS Sensitive) grows in Big Pryor North in the vicinity of Forest Service Road 2500. The travel plan should call for monitoring damage to the plant and immediate remedial steps to be taken to protect it.	
Response: The Travel Plan will call for compliance monitoring which will help assess whether or not issues with sensitive plant populations, including Beartooth Goldenweed, will need further attention. Special orders or changes to the Motorized Vehicle Use Map are steps that can be taken if travel compliance issues threaten viability of population.		

Subject: Vegetation		Response #: V-12, Sensitive Plants – Botanical Hot Spot
Letter-Comment #: 493-1	Sensitive plant species and vegetation concerns were substantially ignored. The Pryor's are a botanical outstanding interest with diverse plants reflecting low and higher elevations. These sensitive plants are threatened by OHMV's, with no fewer than 35 sensitive species in the area.	
Response: Sensitive plant species were analyzed in DEIS Vegetation - Sensitive Plants section. You are correct that the Pryor Mountains are known as a botanical hotspot. The Pryor Mountain's outstanding botanical features and interest will be added to the description of the affected environment in the FEIS - Vegetation section.		

Subject: Vegetation		Response #: V-13, Sensitive Plants - Correction
Letter-Comment #: 385-3	The DEIS gives the habitat of <i>Potentilla plattensis</i> as sagebrush steppe. It actually occurs in moist to wet alkaline meadows within the sagebrush ecosystem. Common associated species include Baltic rush and shrubby cinquefoil.	
Response: This clarification is noted in the FEIS Vegetation - Sensitive Plants section.		

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Subject: Vegetation		Response #: V-14, Preferred Alternative
Letter-Comment #: 226-3	Choosing the management plan that best protects these unique assets is the only responsible action. Without serious regulation and effective administration of the regulations the long term viability of this ecosystem will be degraded and losses will and have occurred. We do not believe that the CNF present preferred alternative (Alternative B) adequately protects the plant and wildlife habitats of the Pryor Mountains. We believe that Alternative C with the modifications suggested by the Pryors Coalition will best protect the fragile ecosystem of the Pryor Mountains.	
Response: There should be reduced risk of impacts to ecosystems under Alternatives B, B Modified, and C and increased impacts under Alternative A. In comparison to the No Action Alternative, Alternative A increases motorized routes by 19%, Alternatives B and B Modified decreases motorized routes by 9% and 7%, respectively, and Alternative C decreases motorized routes by 31%.		

Subject: Vegetation		Response #: V-15, Subalpine Meadows
Letter-Comment #: 254-2	In creating a travel plan for this unique wilderness I urge you to adopt Alternative C. This is not to prevent people from enjoying the Pryor Mountains, but to reduce our impact on the wildlife and their habitat. The sub-alpine meadows are especially sensitive to off-road use and as roads become wet and muddy, they are widened by people going off-road in order to pass.	
Response: Potential high elevation impacts are disclosed in the FEIS Vegetation section. The Season of Use limitations outlined in Alternatives B, B Modified, and C will also limit people going off-road in order to pass during spring thaw in the higher elevations which is when the majority of road widening tends to occur.		

Subject: Vegetation		Response #: V-16, Dispersed Vehicle Camping
Letter-Comment #: 68-44	If the 600-foot swath was actually used, that use would be detrimental to vegetation. I do not know of places where there are campsites on both sides of the road.	
Response: Terrain features (i.e., steeper slopes), areas exposed to harsh elements (i.e. wind-blown ridges, alpine/subalpine areas), and other elements reduce the probability that the entire 600 foot swath would have impacts from dispersed vehicle camping.		

Subject: Vegetation		Response #: V-17, Vegetation - Issues
Letter-Comment #: 136-1	I am concerned that the DEIS contains so little analysis of the impact on native plants of increased exposure to motorized recreation. I do not believe that the DEIS has given adequate attention to the subject.	
136-8	In addition to the general neglect of issues related to vegetation, I am concerned that some of the information presented in the DEIS might be misleading.	
Response: The DEIS focused on areas where issues were raised relative to riparian (DEIS - Water Quality section) and alpine/subalpine zones where impact recovery can be difficult and long term. There was no intent to diminish the potential for impacts to the vast diversity of native vegetation found within the Project Area. A broader section regarding impacts to native vegetation will be included into the FEIS, including information that you and others provided in your responses.		

Subject: Vegetation		Response #: V-18, Vegetation below 8000'
Letter-Comment #: 461-59	The DEIS introduction states that “Most interest heard from public comment pertains to the alpine and subalpine systems that are difficult to recover.” (DEIS p. 3-122). Even though “most interest” in public comments focuses on these areas, this does not mean impacts to vegetation at lower elevations should be excluded from analysis. The DEIS needs to analyze motorized route designations by unit, elevation and cover type. As the DEIS states, “Many of the high elevation motorized routes occur through areas of open grass and forbs on gentle to moderate terrain,” (DEIS p. 3-122). These areas are susceptible to illegal off-route use and the DEIS must evaluate the potential impacts in these areas from illegal use.	
461-60	An adequate analysis would look at each of these characteristics for each planning unit. Instead, the analysis lumped together all miles and acres over 8,000 ft and then claimed that “all alternatives pose minor potential impacts to subalpine / alpine landscape area (less than 3%	

Subject: Vegetation		Response #: V-18, Vegetation below 8000'
	of total),” (DEIS p. 3-123). The decision not to include acres below 8,000 ft is arbitrary and capricious, and in violation of NEPA. Furthermore, the only analysis by alternative is found in Table 3-47. This does not constitute adequate NEPA analysis.	
461-61	The DEIS's unsubstantiated conclusion on cumulative impacts is that “Implementation of any of the alternatives considered in this EIS would not be expected to contribute to significant cumulative effects associated with native vegetation.” (DEIS p. 3-124). This claim is arbitrary and capricious, and in violation of the disclosure and analysis requirements of NEPA.	
Response: Impacts to vegetation below 8,000 feet are incorporated into the FEIS. NEPA analysis typically assumes that there will be compliance with laws, regulations, and policy. Attempting to identify the location and extent of unauthorized off-route use is outside the scope of this analysis.		

Subject: Vegetation		Response #: V-19, Weeds, Level of Risk
Letter-Comment #:	In discussing the analysis methodology, the DEIS explains, “Overlaying weed inventories and designated public motorized routes, with this susceptibility assessment can further identify areas that are potentially at risk from invasion.” (DEIS p. 3-129). Unfortunately, designated routes do not include identified non-system routes. The decision to exclude identified non-system routes from the weed susceptibility assessment was arbitrary and capricious, and is in violation of NEPA. Therefore, all conclusions based on the Level of Risk determinations should be re-evaluated.	
461-62		
Response: The analysis is based on the design of each Alternative which includes variations in which some non-system routes become system routes. For those alternatives which describe changing non-system to system routes, the DEIS / FEIS did complete the analysis for those particular routes. Non-system routes not designated for public use may remain on the landscape until such time that they re-vegetate naturally or are physically decommissioned. From a cumulative effects standpoint, there is potential for weed spread along these routes, just as there is potential for weed spread in some areas that are not disturbed, or areas that could be disturbed by other elements such as wildfire.		

Subject: Vegetation		Response #: V-20, Weeds (Motorized/Non-motorized)
Letter-Comment #:	Given the very serious threat of noxious weeds, and the fact that five times as many acres are highly susceptible within the motorized road corridors in Alternative B than in Alternative C, we simply can see no basis for the following sentence which appears, without justification, in the middle of the analysis. <i>Based on these observations, there is insufficient data to draw a definite conclusion that any alternative would have a significant difference on the spread of noxious weeds based only on the type of use allowed under that alternative. (DEIS page 3-135)</i>	
129-28		
Response: This paragraph will be revised in the FEIS to clarify the intended concept. Research has shown that motorized vehicles tend to have a greater association for spreading weeds than non-motorized vehicles (Tyser and Worley, 1992). The current weed inventory for the Custer National Forest shows this same correlation; more weeds are present along motorized routes than along non-motorized routes. However, except for the Londale and Lane research, there is no data that shows different types of motorized vehicles spread weeds at different rates. For example, ATVs are not proven to spread more weeds than snowmobiles, or pick-up trucks. Consequently, all forms of motorized vehicles were lumped together in the risk analysis. The route was considered to be at a higher risk to weed invasion if it was used by motorized vehicle than if it was used by non-motorized vehicle.		

Subject: Vegetation		Response #: V-21, Clarification
Letter-Comment #:	The DEIS states, “[t]he amount of use is of much greater significance in determining the risk of spreading or introducing noxious weeds than the type of use,” (p. 3-134), but does not cite any studies for this conclusion. The DEIS further states, “No data on the amount of use on various roads and trails has been collected. Neither is there any known data concerning the correlation between the type of recreation use and the spread of weeds.” (DEIS 3-134). This statement seems to contradict previous conclusions that “Motorized vehicles and equipment contribute the most to introduction and spread of noxious weeds because of vehicle mobility and size, and/or distance of travel within a given time,” (DEIS p. 3-127). Finally, the DEIS concludes, “there is insufficient data to draw a definite conclusion that any alternative would have a significant difference on the spread of noxious weeds based only on the type of use allowed	
461-64		

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Subject: Vegetation		Response #: V-21, Clarification
	under that alternative.” (DEIS p. 3-135). This is arbitrary and capricious, and in violation of NEPA. The deficiencies stated above clearly demonstrate that the Custer NF did not take a hard look at weed susceptibility in the Pryors Unit, and the DEIS made contradictory statements in order to arrive at its conclusion.	
<p>Response: This paragraph will be revised in the FEIS to clarify the intended concept. The word "motorized" should have been in front of "use" when addressing "amount of use" and "type of use". The statements, “No data on the amount of use on various roads and trails has been collected. Neither is there any known data concerning the correlation between the type of recreation use and the spread of weeds”, will also be removed for clarification. The intended information was stated further in the same paragraph. Research has shown that motorized vehicles tend to have a greater association for spreading weeds than non-motorized vehicles. The current weed inventory for the Custer National Forest also shows this same correlation; more weeds are present along motorized routes than along non-motorized routes. However, except for the Londale and Lane research, there is no data that shows different types of motorized vehicles spread weeds at different rates. For example, ATVs are not proven to spread more weeds than snowmobiles, or pick-up trucks. Consequently, all forms of motorized vehicles were grouped together in the risk analysis. The route was considered to be at a higher risk to weed invasion if it was used by motorized vehicle than if it was used by non-motorized vehicle.</p>		

Subject: Vegetation		Response #: V-22, Table Clarification
Letter-Comment #: 461-63	Just as in the vegetation recovery section, the DEIS analysis arbitrarily lumped together the entire planning area for weed susceptibility by cover type, (Table 3-52, DEIS p. 133), even though Table 3-51 contains this information for the Beartooth Unit separately. Nowhere does the DEIS list the same information for the Pryors Unit. Even more, Table 3-53 lists the acres of current weed infestation by alternative only. This approach does not adequately analyze weed susceptibility in the Pryors Unit.	
<p>Response: DEIS Table 3-51 contains information for the Beartooth District, which includes both the Beartooth and Pryor Units. DEIS Table 3-53 also contains information for the Beartooth District, which includes both the Beartooth and Pryor Units. In response to public comments, the FEIS displays of information by the Beartooth Unit, the Pryor Unit, and the Beartooth District as a whole.</p>		

Subject: Vegetation		Response #: V-23, Literature Citations
Letter-Comment #: 411-54	The weed study is flawed. The CNF is using a study from Australia. This study says that the majority of weed seeds are spread by 4-wheel drive off road vehicles vs. 2-wheel vehicles. This is the closest study that CNF can find to support a preconceived agenda to restrict OHV's. While ignoring a study from Shelley and Petroff from Montana State University. That states wind, and wildlife are the major spreaders of weed seeds in the forest. Their no study's linking OHV use as a major spreader of weed seeds. The CNF has failed to contact local state and county weed board officials for information concerning control of weeds and the spread of weed seeds. Not doing this shows the CNF is not interested in working with agency's that are more experienced with these matters than the CNF. The CNF should work with these agency's to come up with a accurate weed plan. And not base it on speculation and study's from areas that do not share any resemblance to the CNF on topography, plant and weed species, climate, recreational uses, and public education.	
<p>Response: The 2006 Custer National Forest Weed EIS was utilized in the analysis and incorporated by reference (DEIS Vegetation - Weeds section). The 2006 EIS was a comprehensive analysis which incorporated exhaustive literature citations, including Sheley and Petroff (1999) form Montana State University. The DEIS disclosed the information that wind, water, and wildlife can also spread weed seeds. The local state and county weed officials were contacted during the 2006 Weed EIS as well. The Forest Service routinely coordinates with them. The DEIS provides evidence that there is a high association with the Custer National Forest inventoried weed populations being found along motorized routes as well as in areas of wildfire occurrence (DEIS Vegetation - Weeds section).</p>		

Subject: Vegetation		Response #: V-24, 2006 CNF Weed Management EIS
Letter-Comment #: 66-89	We request that the document make a fair evaluation of all sources and uses that contribute to the noxious weed problem including hikers, mountain bikers, equestrians (non-use of weed-free hay), etc. The document should also fairly evaluate how natural processes and wildlife spread noxious weeds. The document should include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors and with a realistic representation of noxious weeds natural ability to spread versus a relative magnitude for every activity's contribution.	
Response: This analysis tiers to the 2006 Custer National Forest Weed Management EIS and will not be reiterated in the Travel Planning EIS. The DEIS and the 2006 Weed EIS did recognize spread vectors by all types of human uses, natural processes, and wildlife (DEIS Vegetation - Weeds section). The majority of the inventoried weeds on the Beartooth District occur along motorized routes and many are associated with wildfire areas. The Integrated Pest Management Program (including descriptions of the education, prevention, control methods, mitigation measures, monitoring and early detection) was described in the 2006 Weed EIS. To help mitigate weed introduction and spread of weeds, best management practices outlined in the 2006 Custer National Forest Weed Management EIS and Forest Service Manual 2080 are applied impartially to all visitors and users.		

Subject: Vegetation		Response #: V-25, Vehicle Cleaning
Letter-Comment #: 406-12	We require weed free feed for pack and riding stock using the forest - but what has been done for weed free vehicular travel?...Would a requirement that all motorized vehicles and trailers be washed clean (top and bottom) less than 8 hours prior to use on public property, be appropriate?	
418-8	Consider requiring vehicles be clean and weed-free before entering the Forest just as you require weed-free horse traffic. As you know, once introduced, noxious weeds are almost impossible to remove.	
Response: Requiring all motorized vehicles and trailers to be cleaned and weed-free prior to entering all Forest Service land is not a feasible mitigation measure, nor is it enforceable, so it was dismissed from further consideration.		

Subject: Vegetation		Response #: V-26, Vegetation - Impacts
Letter-Comment #: 406-11	The continued motorized use of these routes will only exasperate the existing environmental damage and heighten the nauseating long term repair cost. Continued compaction of soils, denuding of vegetation and deposits of weed seed by vehicles, even the smaller ATV's will lead to irreparable (sic) damage of the environment. At least the conversion to non-motorized trails will lessen the rehabilitation costs and be more resource friendly.	
Response: Vegetation impacts are disclosed in the FEIS Vegetation and Weeds section.		

WATER QUALITY

Subject: Water Quality		Response #: WQ-1, Opportunities
Letter-Comment #: 40-2	The DEIS indicates that only a small percentage of roads on the District received annual maintenance. We believe there is a need to address road conditions that contribute to degraded water quality and aquatic habitat particularly to address road related water quality impairment in 303(d) listed streams.	
40-5	Efforts to improve road conditions and reduce sediment delivery from roads should be an important element of the Travel Plan. The Custer National Forest, Beartooth Ranger District should coordinate their travel management planning with the Montana DEQ as well as EPA TMDL staff to assure travel plan consistency the TMDLs and water quality restoration plans being prepared by MDEQ.	
40-7	It is not clear to us, however, if adequate resources (funds) are available to implement the field recommendations in Table 3-31 and/or the priority rehabilitation measures in Appendix E to address water quality impacts. The FEIS should identify those recommendations which will be carried out on a timely basis to address water quality impacts of existing roads and adjacent	

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Subject: Water Quality		Response #: WQ-1, Opportunities
	dispersed sites.	
40-12	However, even though we are pleased that the preferred alternative would likely reduce motorized use impacts to water quality, we have concerns that non-use of some routes (#2073F, 2073H, 2085A, 2097C, and 2478) will not fully mitigate water quality impacts, and future actions will be needed to bring such routes into compliance with forest plan standards and water quality regulations (page 3-93).	
461-37	Given that the DEIS already stated that nonmotorized trails have less impacts than motorized routes, the DEIS should provide a breakdown of each trail class type and road maintenance level with information on what mitigation needs would be necessary for each. The DEIS should provide evidence that the BMPs adequately minimize soil impacts before making a blanket statement that there will be no significant impacts from the preferred alternative. We would like to point out that reduced impacts does not necessarily equal adequate mitigation, or meet the E.O. requirement to minimize impacts.	
461-39	Though BMPs are often considered to be sufficient to satisfy this requirement, if motorized use of a route is in violation of the Surface Water Quality Standards, even with application of the BMPs, then the route should be closed until further degradation can be avoided.	
461-40	The DEIS refers to the use of BMPs to satisfy the requirement of preventing degradation or contributing to degradation of already limited streams, and states that BMPs will be more fully discussed later. (DEIS p. 3-77). However, no specific discussion of BMPs, as relating to water quality, can be found in the DEIS, other than a laundry list of general BMPs ⁶ which does not specify when application of these BMPs is triggered, how they are implemented, or how effective they have proven to be. There is no explanation for how the “reasonableness” of BMPs is determined or whether their application provides for the protection of “present and reasonably anticipated beneficial uses.” (See ARM 17.30.602(25)).	
461-47	However, in order for the analysis to be accurate, and for the list of priority rehabilitation to be effective in reducing actual water quality impacts, unidentified non-system routes need to be addressed. We request that the Custer NF provide a plan and implementation schedule for removing any non-system routes after the release of the Beartooth District MVUM.	
<p>Summary of Comments: Several comments expressed concern that existing route and dispersed site impacts to water quality may not receive adequate funding to mitigate the impacts and requested that a rehabilitation plan be incorporated into the travel plan decision. Several comments requested routes or sites that impact water quality be closed until mitigation is applied. Another comment raised concerns over the identification, implementation and effectiveness of best management practices (BMP) to mitigate water quality impacts.</p>		
<p>Response: This travel plan process is the first step towards addressing known water quality problems associated with transportation routes and dispersed camp sites. Routes with substantial impacts were either not designated or were designated for administrative use only, and dispersed campsites with substantial impacts were closed. These routes and sites were then added to Appendix E- Opportunities where future analysis would determine the level of mitigation necessary to address the impact. Site specific design of BMPs would occur at this stage. Routes and sites with a lower level of impact that can be addressed through normal maintenance were left open, but again added to Appendix E as a future opportunity. Since out-year funding levels and priorities are unknown at this time, defining a firm schedule for implementation of these opportunities is not possible through this analysis.</p> <p>Publications concerning BMP effectiveness of road maintenance and construction include Logan (2001), Seyedbagheri (1992), and USDA-FS (2002).</p>		

Subject: Water Quality		Response #: WQ-2, TMDL
Letter-Comment #: 40-5	Efforts to improve road conditions and reduce sediment delivery from roads should be an important element of the Travel Plan. The Custer National Forest, Beartooth Ranger District should coordinate their travel management planning with the Montana DEQ as well as EPA TMDL staff to assure travel plan consistency the TMDLs and water quality restoration plans being prepared by MDEQ.	
40-6	We recommend that the impairment status of surface waters within the area be compared vs. the most current 2006 303 (d) list (available at, http://www.deq.state.mt.us/CWAIC/default.aspx), to be sure that all listed streams are identified in the FEIS.	

Subject: Water Quality	Response #: WQ-2, TMDL
<p>Response: TMDL streams on the 2006 303(d) List that were pertinent to this analysis were identified correctly in the DEIS. TMDL streams not identified in the DEIS involve Category 1 and 4C streams (TMDLs not required), and stream segments that do not headwater on the Forest. All streams listed on the 2006 303(d) List within and adjacent to the District are now included in the FEIS along with clarification of TMDL category and location relative to the analysis area. All of these streams are scheduled for TMDL development during the 2009-2012 planning period. Information in the FEIS relative to water quality will be available and provided during this TMDL planning process.</p>	

Subject: Water Quality	Response #: WQ-3, Meyers Creek/Lodgepole Trails
<p>Letter-Comment #: 438-1</p>	<p>The proposed conversion of Route #22, Lodgepole Trail and #27 Meyers Creek Trail to non-motorized use is not supported with documentation and scientific rationale for the change. Motor Vehicle Route and Area Designation Guide, National OHV Implementation Team V111705, page 26 states: Purpose and Need. Changes to the forest transportation system are evaluated as site-specific proposal. Each proposed action required a site-specific statement of purpose and need, which should be narrowly tailored to the proposal. The statement of purpose and need should enumerate the rationale for the site-specific changes being proposed. Chapter 3, page 94 refers to 'reduce risks to water resources' by closing the trail to motorized travel, Table 3-31, page 86 shows "Lodgepole Creek, Maintain and monitor". The attached appendix A contains two water quality studies conducted in other areas to be added to the discussion on last paragraph, page 3-82. While they were not conducted on the area in question or in Montana, the conclusions and management actions taken show area closure is not the answer to the possible risk to the water resources and Your Appendix C page 16, offers two different rationales: 1. "Provide additional opportunities for pack and saddle stock". Our comment: With 345,000 acres of the Absaroka-Beartooth Wilderness Area lying within the District it would appear the opportunities already exist in abundance. If there is a need for more pack and saddle stock opportunities, it should be supported by documented monitoring of actual usage in the area. 2. 'Reduce disturbance to wildlife habitat and provide a non-motorized hunting experience'. Comment on the non motorized hunting experience: Documented objective evaluation and monitoring of the hunting areas must substantiate the need for more non motorized hunting experiences. If that need is proven, a restriction on these trail during hunting season would be reasonable mitigation</p>
<p>Response: Trails 22 and 27 are proposed for motorized use with motorcycles under Alternative B Modified. A seasonal use period is proposed from 6/15 to 12/1.</p> <p>Thank you for the information you provided on water quality studies of off-road vehicle use in California. Due to the range of variability in site characteristics and conditions across the country, motorized travel has a tremendous variability in type and level of impact. Some sites are much more sensitive to disturbance and less resilient to heal than others. Mitigation that allows motorized use in some areas may not be adequate mitigation, or may be too costly, to allow use in other areas.</p>	

Subject: Water Quality	Response #: WQ-4, Forest Service Handbook
<p>Letter-Comment #: 461-41</p>	<p>Chapter 2 refers to the "Soil and Water Conservation Practices Handbook," housed at FSH 2509.22, as containing the applicable BMPs. The internet site for Forest Service directives does not contain a FSH 2509.22. Region 2's Soil and Water Conservation Practices Handbook appears to be housed at FSH 2509.25, but there is no corresponding direction for Region 1. Please explain this discrepancy and provide the appropriate information concerning type and application of BMPs. Finally, the citation for the definition of "naturally occurring" is incorrect and should be ARM 17.30.602(19). There is no ARM 16.20.603.</p>
<p>Response: The Soil and Water Conservation Practices Handbook is a regional directive and is not available on the Regional Office or Washington Office website. It is however, available from the project record. The format of this handbook provides an objective, explanation and implementation for each practice listed. Individual practice identification numbers are provided in the FEIS to facilitate reference to the handbook. An effort is currently underway at the Washington Office level to revise this handbook for consistency and use across the entire National Forest System and a final version is expected in 2008 or 2009.</p>	

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Subject: Water Quality	Response #: WQ-4, Forest Service Handbook
Our reference for naturally occurring has been updated to ARM 17.30.602(19).	

Subject: Water Quality		Response #: WQ-5, Cumulative Effects
Letter-Comment #: 461-42	<p>The effect of proposed routes together with existing system routes should be evaluated cumulatively in order to gain a clearer picture of potential environmental impacts. Sedimentation on existing routes is mentioned several times in the analysis and should be fully evaluated in the direct effects of the proposed action. The DEIS states “Due to the large number and miles of routes, GIS analysis using existing spatial data was the only practical method to accomplish this evaluation” (DEIS p. 3-83). While it may be practical to use this approach it is not necessarily accurate if the spatial data excluded non-system routes. Unfortunately the DEIS does not explain the limitations of this approach as is required under the Data Quality Act. Without accounting for the deficiencies of the model, cumulative impacts cannot be adequately analyzed.</p>	
<p>Response: The effects of the proposed actions along with existing routes are analyzed and displayed in the FEIS, as they were in the DEIS. The effects are based on a risk analysis, not a sediment modeling analysis. As stated in the DEIS, “Existing cumulative effects models for water and sediment yield are not adequate to quantify to a single cumulative value, the effects of all the diverse activities in individual drainages including wildfire/prescribed fire, mining, dispersed camping, off-highway vehicle use, grazing, floodplain development, timber harvest, and transportation networks. A combination of individual models could prove useful, but a large amount of additional data (on-ground and spatial) would be necessary to obtain valid results. The only way to address these various activities cumulatively for this travel plan analysis is to address each activity individually and then qualify, in general terms, the cumulative effects between specific activities where appropriate.” Additional information is provided in the FEIS supporting the rationale to not use sediment models for effects determination in this analysis.</p>		

Subject: Water Quality		Response #: WQ-6, Stream Crossings
Letter-Comment #: 461-43	<p>There appears to be no evaluation of the effect of increased use of stream crossings in areas that do not have bridges or other constructed crossings, and therefore are occurring in the streambed itself, stirring up sediment and disturbing stream habitat. There is also no discussion of stream crossings of user created routes that are additions to the system. These effects must be disclosed in order to make a fully reasoned and informed decision.</p>	
<p>Response: Stream crossings are accounted for in the water quality analysis in the FEIS, as they were in the DEIS. The number of crossings of perennial streams and intermittent streams are one of three basic variables used in the route risk analysis. This variable is also used in the cumulative route risk analysis by 6 HUC watershed. Crossings are identified through a GIS intersection of the route layer and stream layer. The route layer includes user created routes as identified during the 1999-2000 field verification effort.</p>		

Subject: Water Quality		Response #: WQ-7, Maintenance
Letter-Comment #: 461-37	<p>Given that the DEIS already stated that nonmotorized trails have less impacts than motorized routes, the DEIS should provide a breakdown of each trail class type and road maintenance level with information on what mitigation needs would be necessary for each. The DEIS should provide evidence that the BMPs adequately minimize soil impacts before making a blanket statement that there will be no significant impacts from the preferred alternative. We would like to point out that reduced impacts does not necessarily equal adequate mitigation, or meet the E.O. requirement to minimize impacts.</p>	
461-44	<p>In addition, Table 3-30 titled, “Route Risk Summary” should display miles and number of routes by specific trail class and road maintenance levels. Without looking at these routes individually, the DEIS cannot adequately evaluate potential water quality impacts because each trail class and road maintenance level have different erosion potentials and therefore different mitigation needs. This demonstrates a need to look more closely at conditions on the ground or at the very least use a modeling system that can adequately account for different trail classes, road maintenance levels and non-system routes.</p>	
<p>Response: Road maintenance levels were initially considered as a potential variable to use in the route risk analysis. However, since the level of backlog maintenance is high, the correlation between any given routes’ maintenance level and the actual maintenance the route receives is poor. Therefore, maintenance levels, or trail class, were not useful or</p>		

Subject: Water Quality	Response #: WQ-7, Maintenance
appropriate variables to incorporate into the route risk analysis.	

Subject: Water Quality	Response #: WQ-8, Vehicle Type
Letter-Comment #: 461-45	While this may be true for some actions, we take exception with the claim that converting system roads to motorized trails open to all motor vehicles will not increase risk for moderate and high risk routes. However, by allowing vehicles over 50” to use these trails, they will in effect act as roads and have the same tread width and vehicle weight/compaction. Even more, their potential for impacts may be greater than a road because maintenance will be based on trail class instead of road maintenance level. The water quality impacts analysis needs to account for this difference instead of making a blanket assertion that all roads to trails conversion will reduce impacts.
Response: Thank you for pointing this out. Since the type of vehicle use or the level of maintenance on these routes is unlikely to change significantly through this action, we anticipate no change in risk to water quality from these actions. This change is incorporated into the FEIS, Water Quality, and Environmental Effects.	

Subject: Water Quality	Response #: WQ-9, Administrative Use
Letter-Comment #: 461-46	Furthermore, the assertion that non-use will adequately mitigate impacts on routes converted to administrative use is questionable at best. While this may occur, the DEIS provides no assurances that there will be adequate monitoring to ensure the mitigation is sufficient, nor does it describe the closure devices or enforcement strategy that will ensure illegal use does not occur.
Response: The DEIS states “ <i>Converting system roads to administrative use reduces traffic and allows revegetation of the road surface to occur, both of which reduce erosion.</i> ” The DEIS did not assert that non-use will adequately mitigate impacts from these actions. In fact, the DEIS, Water Quality, Effects By Alternative, Alternative A states: “ <i>field observations indicate that routes 2073F and 2073H contribute to water quality impacts and this conversion will not mitigate these impacts.</i> ”	

Subject: Water Quality	Response #: WQ-10, Route Risk Analysis
Letter-Comment #: 461-48	The Custer NF should have provided at least one action alternative that does not designate motorized use on moderate and high risk routes. Both the Preferred Alternative and Alternative C add essentially the same amount of non-system routes with moderate or high risk ratings; this is hardly a choice. The West Fork Rock Creek drainage is a municipal watershed, with an A-1 classification from the state of Montana. A-1 classified streams are held to a higher standard than B-1 classified streams, including lower thresholds for coliform and turbidity. There is no alternative which fully protects and improves this important watershed. Heavy dispersed recreation (camping) impacts are occurring in the Rock Creek drainage. (DEIS p. 3-82). However, there is no indication as to how these water quality impacts will be eliminated.
Response: The route risk analysis is a theoretical approach to help determine relative risks (hypothetical impacts) across a broad landscape and the range of alternatives. It is based on limited data input and is not meant to reflect absolute site conditions. It is not appropriate to use the results from this analysis to identify routes for non-designation. That determination should only be based on actual field verified impacts as was done for a number of routes.	
Providing an adequate range of alternatives does not require that every single action within a decision have a range of possible outcomes. The range of designated non-system moderate and high risk routes varies from 0 to 5.4 miles across all alternatives.	

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Subject: Water Quality		Response #: WQ-11, Non-system Routes
Letter-Comment #: 461-49	Finally, it is inappropriate that all alternatives provide for adding user created routes to the transportation system. As admitted in the draft EIS, “[u]nplanned (user created) routes have the potential to be the most detrimental to water quality because of improper location of the route in relation to adjacent streams.” However, many user created routes are adopted into the proposed system under all alternatives. It is inappropriate to add these routes to the system without extensive discussion as to the measures that should and will be taken to mitigate the impacts of these routes to water quality. The effects of these routes cannot be brushed aside by referring to the incorporation of BMPs.	
Response: The Forest Service had extensive discussions on all routes, including user-created routes, to ascertain the appropriateness of designating individual routes. User created routes do have the <i>potential</i> to be the most detrimental to water quality, but not all user-created routes are <i>in fact</i> , impacting water quality. Those user-created routes that were designated, were either found to have no adverse resource impact, or were identified as requiring mitigation and then added to the list of opportunities.		

Subject: Water Quality		Response #: WQ-12, Routes #21407 & #241412
Letter-Comment #: 461-50	The DEIS states “This alternative proposes to add 4.1 miles of moderate and high risk nonsystem routes. Field observations indicate that routes 21407 and 241412 proposed for addition contribute to water quality impacts. Adding these routes to the transportation system will continue these impacts into the foreseeable future until road maintenance occurs, although it is unknown when maintenance would occur.” (DEIS p. 3-93). This is an obvious violation of the E.O.s direction to minimize impacts and should be eliminated from any alternative.	
Response: Actions associated with these routes have been changed in the FEIS. Route 21407 is proposed to be designated contingent on correcting water quality problems, and 241412 is not proposed to be designated.		

Subject: Water Quality		Response #: WQ-13, Sediment Production
Letter-Comment #: 66-19	A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes fires. The recent fire in the Custer National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years.	
66-164	Therefore, the impact of recreation should be fairly compared to the impact of floods, wildfire, and other natural events on all resource areas. These comparisons should also include natural levels of noxious weeds, carbon dioxide production (http://www.cbmjournals.com/content/pdf/1750-0680-2-10.pdf), deforestation, erosion and sediment production, and loss of organic material....Sediment production associated with motorized recreation cannot begin to compare to this magnitude and, therefore, it is not reasonable use sediment as a basis to close motorized recreational opportunities when impacts from “Let it burn” and other management policies are a million times greater and considered acceptable.	
Response: Sediment production from travel routes was not quantified for this analysis due to numerous issues associated with existing sediment models as relayed in the DEIS. Erosion and sediment transport was discussed in both general terms, and in specific terms in relation to various activities.		
<p><i>As stated in the DEIS, “Watersheds, undisturbed by human influences, are not static systems. Deep snow packs and heavy spring rains can cause substantial flooding, landslides and instream erosion. Wildfire, wind, or insect and disease mortality can drastically alter the vegetative composition of a watershed. Depending on the extent of mortality and rate of stand decomposition, impacts to stream systems can also be substantial. Beneficial uses, including fisheries habitat, can be negatively affected by these natural events. However, watersheds left undisturbed after natural events, can and do recover rapidly, and ultimately provide conditions that fully support all beneficial uses within a relatively short period of time. These natural disturbances occur infrequently, which allows for significant and generally rapid recovery of hydrologic and erosional processes prior to the next major disturbance event. This results in pulse effects to water resources, which are moderate to high in magnitude, but low in frequency. Within the current climatic regime and prior to significant human influence, stream systems have developed under pulse type</i></p>		

Subject: Water Quality	Response #: WQ-13, Sediment Production
<p><i>disturbances. The effects from recurring or continual human activities are considered <u>chronic</u>. Although chronic effects are generally low to moderate in magnitude, they occur with moderate to high frequency. In contrast to pulse effects, chronic effects may not allow for significant recovery of the soil and water resource over time.</i></p> <p>For this reason, human caused sediment is an issue and Montana Water Quality Law requires that human caused sediment loading to surface waters be minimized for all land management activities. Under ARM 17.30.623 (2) (f) (B1 waters) “No increases are allowed above naturally occurring concentrations of sediment, settleable solids, oils, or floating solids, which will or are likely to create a nuisance or render the waters harmful, detrimental, or injurious to public health, recreation, safety, welfare, livestock, wild animals, birds, fish, or other wildlife.” Naturally occurring is defined in ARM 16.20.603 as: “the water quality condition resulting from runoff or percolation, over which man has no control, or from developed lands where all reasonable land, soil and water conservation practices have been applied”. Reasonable land, soil and water conservation practices are similar to Best Management Practices (BMPs). BMPs are considered reasonable only if beneficial uses are fully supported. (DEIS/FEIS, Water Quality, Affected Environment)</p>	

Subject: Water Quality	Response #: WQ-14, Dispersed Camping
Letter-Comment #: 66-44	Dispersed campsites are very desirable camp sites. Closure of these sorts of dispersed campsites would have a very significant impact on the public and we request that they remain open. If water quality concerns are the basis for these closures, then there are reasonable alternatives to mitigate these concerns, such as allowing only self-contained camping units to use them. Additionally, a sense of magnitude needs to be applied when assessing the water quality impacts from camping. For example, it appears that cattle grazing along the stream have a much greater impact than any camp site that we observed. Now don’t get us wrong, we support all reasonable multiple-uses of the forest including cattle grazing. We are concerned that the incremental impacts on the public of closing dispersed camp sites are relatively significant while the real improvement to the environment will be relatively insignificant. Again, we request that all reasonable camp sites located along water courses remain open.
66-45	If dispersed camp sites are to be closed based on water quality concerns, then we request that the decision include a water quality monitoring program to establish the baseline water quality prior to the closure of dispersed camp sites and continue that program after the closure to establish whether any significant water quality improvement was realized. The decision should also include a provision to re-open closed camp sites when no significant improvement in water quality was realized by the closure.
<p>Response: The majority of dispersed campsites reviewed have minimal or no impact to water quality. This is due to site characteristics that are relatively resistant to normal human activities that occur from camping. Characteristics that increase the risk of impact include 1) sites that confine and route surface runoff to trails that access streams, 2) sites located directly adjacent to streams where no filter distance exists to trap sediment, and 3) sites adjacent to stream banks composed of fine textured soils that are easily destabilized by foot traffic, are difficult to revegetate and are prone to erosion by high streamflows. These sensitive sites are deemed too costly to maintain and difficult to rehabilitate after impacts have occurred.</p> <p>The water quality impacts of single or multiple dispersed sites would not likely be detectable in streamflow because 1) the sediment load from the site is minor relative to numerous other sediment loads from the upstream watershed, both natural and human caused, 2) variability in sediment production and transport due to variability in precipitation events, and 3) inability to differentiate sediment loads of dispersed sites from other sediment sources upstream. Monitoring on-site ground conditions and determining whether or not sediment is routed to stream systems is preferred to monitoring streamflow water quality.</p>	

Subject: Water Quality	Response #: WQ-15, Routes in the Pryors
Letter-Comment #: 68-20	The Pryors Coalition has recommended that Island Ridge road, 2093, be permanently closed, as it is little used and unnecessary. Additionally there are water quality concerns.
68-21	The road leaving the junction with 2092 goes into the Commissary Creek drainage. The initial section is through clayey soil that is very slick when wet. Commissary Creek pools before it flows over the road. There is no culvert to protect either road or stream.
68-22	Less than a half-mile is a wooden cattleguard which is rotting. Soon it will be difficult for a

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Subject: Water Quality		Response #: WQ-15, Routes in the Pryors
		wheeled vehicle to pass that point unless the Forest Service fills the ditch under the guard. Perhaps there are plans to replace the wooden cattleguard with a metal one.
68-25		The roads 2492 and 2814 become hellacious in the northern half of section 74 and the southern half of sections 28 and 27 in T 8S R 26E... There are places where the roads are steep and the drainage is directly down the road. Any soil and gravel has been washed out.
68-27		The section of 2850, Stockman Trail, between the junctions with 28507 and 28505 is one of the worst braided roads in the Pryors... The multiple parallel roads are subject to erosion even though they are on contour. Seasonal closure is not a solution to healing his quagmire. I recommend that this section be permanently closed.
467-16		As to specific trouble areas, the geology, topography and soil science related to the steeper portions of Forest Service roads 2496 (Miller Trail) and 2850 (Stockman Trail) combine to create a soil erosion and water quality problem. The soil underlying these roads easily ruts and erodes. When it is carrying water, Ingraham Creek runs down onto Stockman Trail and alongside it for a quarter-to a half-mile, picking up sedimentation from the erosion and washing it downstream. The Forest Service should study this and perform corrective maintenance before marking the road open.
Summary of Comments: Water quality concerns with specific routes in the Pryors.		
Response: Thank you for all the information on erosion problems along these routes. Route 2093 and portions of route 2850 are proposed for seasonal closure and should address some of the erosion problems. However, because the watercourse next to Stockman Trail has an intermittent or ephemeral flow regime, and sediment and flow drop out when valley bottom grade flattens out, water quality issues do not exist relative to any perennial stream downslope. All of the problems you have identified are included in Appendix E- Resource Improvement Opportunities and will be addressed as funding becomes available.		

Subject: Water Quality		Response #: WQ-16, Wetlands
Letter-Comment #: 40-16		We believe the FEIS should include some disclosure of potential travel management impacts upon wetlands, and if no impacts are expected, at least state that.
Response: The route risk analysis is a surrogate for effects to streamside wetlands (riparian areas). Routes, or portions of routes that lie within 100 feet of perennial or intermittent streams is a variable in the analysis that increases the route risk index. Routes with these characteristics generally fall into the moderate or high risk category, although not all moderate and high risk routes contain substantial streamside wetlands. Isolated wetlands are a much more difficult resource to access the impacts from transportation systems, especially on a large scale. Field reviewed routes were the means to identify impacts and only one isolated wetland was found, although it could also be linked to the very upper end of the headwaters of Crooked Creek. Route 2097C is an alternate route to the Sage Creek Guard Station and crosses a wetland area with seeps. This is an existing system route that would <u>not</u> be designated under Alternative B Modified.		

WILDLIFE

Subject: Wildlife		Response #: WL-1, Impacts of Motorcycles on Wildlife Security
Letter-Comment #: 25-1		If it is a game wintering area motorcycles won't be there during that time of the year anyway.
25-2		If it is a game crossing area motorcycles won't and don't have any negative impact on that either.
190-1		These two trails are #27- Meyers Creek and #22 - Lodgepole. The main reason given is due to the interruption of the game migration patterns. Do you have documented studies of this? If so we would like to see these studies and over how many years have they been done? The reason for our or my concern is that the authorized use of these trails as well as others had been going on for 50 years. The use of these trails has not produced user conflict or created resource damage. The use of these trails by motorcyclers has been to produce that Forest outdoor experience while not being subjected to other forms of motorized use.

Subject: Wildlife		Response #: WL-1, Impacts of Motorcycles on Wildlife Security
396-10	Wildlife security is not threatened by motorcycle use unless they are purposely being chased or harassed, which is illegal. A study performed at Montana State University on wildlife proved that animals showed lower heart rates and shorter flight distances when approached by motorized vs. non-motorized users because the element of surprise does not exist with motorized users like it does with hikers, horses, and mountain bikes.	
Summary of Comments: Questions the impacts of motorcycles on big game and wildlife security. One commenter requested to see studies.		
Response: The Forest Service has not conducted studies of big game use of this area. Information on big game use was provided by Montana Fish, Wildlife and Parks. Elk migrate through the Meyers Creek and Lodgepole Creek areas in spring and fall as they move between summer and winter range. In addition, the lower portions of both drainages provide mule deer winter/spring range and spring moose calving habitat. Few studies specific to effects of motorcycles are available. Detailed information and cited literature regarding impacts of motorized recreation on big game and other wildlife is in the Affected Environment-Management Indicator Species: Elk and Affected Environment - General Wildlife sections of the FEIS. Additional information is in the wildlife report in the project file.		

Subject: Wildlife		Response #: WL-2, Route #22 (Lodgepole) & #27 (Meyers)
Letter-Comment #: 28-1	We would like to see these areas closed to motorized vehicles. Closing to motorized vehicles would minimize impacts on the elk migration/reduce disturbance to high quality wildlife habitat & provide a non-motorized area for hikers/horseback riding & hunting...	
29-1	I agree with alternative B and C for the Lodgepole and Meyers Creek areas. This remote location should be closed to motorized vehicles to minimize impacts on elk migration through the area and to keep to a minimum any disturbance of wildlife habitat.	
32-3	Closing these roads to vehicles would not only help to minimize the impact on elk migration, but would also help to reduce disturbances to the habitats of the incredible wildlife that exist here	
33-1	I agree with Alternative B & C for Lodgepole and Meyers Creek areas. As former landowners, then annual visitors, and now current leasees of property bordering on both Lodgepole and Meyers Creek area since 1975, my family holds sacred the continued remoteness and quiet of the wilderness areas in question. These areas are no place for motorized vehicles; the noise, air pollution and general disturbance of the vehicles change the complexion of one of the most beautiful spots in the state (and country), not to mention the negative impact on important elk migration and all the high quality wildlife habitat these areas provides. Closing these areas to vehicle traffic would also provide a much-needed non-motorized area for hikers/horseback riding and hunting.	
35-1	I am writing in support of Alternative B & C for the Lodgepole and Meyers Creek areas. I encourage this closure for several reasons. I was born in the beautiful Lodgepole valley and even though I no longer reside there it is my hope and dream that it be preserved for future generations. By closing these areas to motorized access this will assist in keeping this area in its natural habitat. Non-motorized access would assist in minimizing impact on the natural elk migration that occurs in this area, as well as, reduce disturbance to a high quality wildlife habitat. By allowing foot traffic there will still be access to the public for a first class non-motorized area for hikers, horseback riding and hunting while preserving a pristine valley for years to come.	
65-1	I wanted to cast my 2 cents worth in support of either Alternative B or C for the Lodgepole Meyers Creek Areas. The best case scenario would be to close it completely to motorized traffic to minimize impact on game habitat and yet keep it available to access for foot traffic and horse traffic to the more remote areas to the north.	
Summary of Comments: Supports closing Lodgepole and Meyers Creek areas to motorized vehicles to minimize impacts to elk and high quality wildlife habitat.		
Response: The Lodgepole and Meyers Creek trails would remain open to motorcycles under Alternative B Modified, with a season of use for protection of big game. The Forest Service believes that designation of these two trails for motorcycle use with a season of use to reduce impacts to wintering big game and moose calving is a reasonable approach to management of these two routes.		

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Subject: Wildlife		Response #: WL-3, FWS Concurrence
Letter-Comment #: 40-21	EPA recommends that the final EIS and Record of Decision include documentation of U.S. Fish & Wildlife Service concurrence with these "no effect" assessments upon T&E species. If the consultation process is treated as a separate process, the Agencies risk USFWS identification of significant impacts, perhaps additional mitigation measures, or changes to the preferred alternative.	
Response: Documentation from the Fish and Wildlife Service is standard procedure and will be provided in the FEIS Chapter 4 – Consultation section.		

Subject: Wildlife		Response #: WL-4, Short-horned Lizard
Letter-Comment #: 41-4	In the wildlife review section, greater short horned lizards are mentioned as inhabiting the area. However, the DEIS states that no plan will increase habitat access that may effect this species. This is an incorrect statement and further work should be done to properly determine the current distribution of this species and the potential impacts.	
Response: In the FEIS, Alternative B Modified would have 25 fewer miles of designated motorized route in the Pryor Mountains than the No Action alternative (124 vs 149 miles) and 42.5 fewer miles than Alternative A, the most motorized alternative (124 vs. 166.5 miles). The FEIS Alternative A includes all routes identified in the 1999-2000 inventory, including non-system routes, except for those that would not be designated for public use under any action alternative. Since new routes are not proposed, there would be no increase in access to short-horned lizard habitat. In addition, Werner, et al (Amphibians and Reptiles of Montana, 2004) state, “Habitat alteration is probably the biggest threat to the Greater Short-horned Lizard.” The travel planning process addresses existing routes, thus habitat alteration has already occurred.		

Subject: Wildlife		Response #: WL-5, Sensitive Snake Species
Letter-Comment #: 41-5	... both hognose and milk snakes are not considered to be in the area in the DEIS, which may also be incorrect without specific surveys to search for these species that are highly elusive and difficult to find. I found no citation for evidence that survey work for these species has ever been done.	
Response: Surveys for hognose snakes and milk snakes have not been conducted on the Beartooth District. The lowest elevation on the Beartooth District is approximately 5000’, well above the highest known elevations that Werner, et al (Amphibians and Reptiles of Montana, 2004) show of 4,060’ for hognose snakes and 3,960 for milk snakes. We recognize the potential for species to occur outside their known geographic and elevational range. However, with site specific data not available, we used information that is known about these species in Montana.		

Subject: Wildlife		Response #: WL-6, Seasonal Closures
Letter-Comment #: 41-6	Seasonal closures should be a part of both Alternative B and C. Seasonal closures for ground nesting birds and songbirds should also be an option that is offered under a plan.	
66-94	Therefore, reasonable alternatives to the closure of motorized roads and trails exist and can be used to address wildlife concerns. We request that these sorts of reasonable alternatives to closure of roads and trails to motorized visitors be adequately considered and incorporated into the preferred alternative.	
310-1	I even agree with further off-road restrictions during hunting season to protect big game, but this is as far as it should go.	
396-14	Instead of completely closing motorized trails in wildlife migratory corridors, a shorter season could be implemented. This method has been used for many years in part of the South Boulder drainage of the Tobacco Root Mountains in the Beaverhead national Forest to protect mountain goats.	
Summary of Comments: Some respondents felt that additional seasonal closures should be included to protect ground nesting birds and songbirds. Others felt that seasonal closures should be used instead of permanent motorized road and trail closures for wildlife protection.		
Response: Seasonal closures for protection of various resources, including wildlife, are included in all alternatives in the FEIS.		

Subject: Wildlife		Response #: WL-7, Peregrine Falcon
Letter-Comment #: 41-7	Peregrine falcon nests are very rare in eastern Montana and the Pryor's comprise well over half the know sites in the eastern part of the state. Therefore these sites should be protected to fullest from possible disturbance, even if it means closing major road sections seasonally.	
Response: Seasons of use to minimize road damage during snow melt would protect the peregrine falcon nest during the earlier part of the nesting season. We recognize that the latter part of the nesting season would not be covered by the season of use. However, the Custer National Forest Land and Resource Management Plan Amendment Number 20 specifies a ½-mile-radius (or less if deemed appropriate after an on-the-ground biological review) no-disturbance zone around peregrine falcon nests from February 1 to August 15. The amendment applies specifically to oil and gas leasing activity, but we could use it as a guideline in travel planning. The known nest in the Pryors is greater than ½ mile from the nearest road that would be open for public motorized travel. In addition, future road closures could be put in place by Custer National Forest Special Order if the Forest Service determines that peregrine falcons are at risk.		

Subject: Wildlife		Response #: WL-8, Route #2144 (Punchbowl)
Letter-Comment #: 53-1	I strongly recommend that the Punchbowl route #2144 be closed to motorized public use east of section 29 (including segments in sections 28, 27, 22, and 23). Official administrative and non-motorized public activities such as hiking and horse riding uses of the track would be compatible with wildlife restoration.	
129-17	Eliminating motorized use of #2144 could help the return of elk to the area.	
386-18	Road #2144 into Punchbowl needs to be closed to motor vehicles to allow secure wildlife habitat in this potentially excellent habitat.	
Response: Road #2144 east of 2144H would be designated with a season of use to minimize road damage during spring breakup, which may potentially benefit some wildlife. However, other resources were also considered during the travel planning process and the Forest Service believes that designation of Road #2144 with a season of use, as identified in Alternative B Modified, is a reasonable approach to management of this route.		

Subject: Wildlife		Response #: WL-9, Route #2088
Letter-Comment #: 106-6	Please close Route 2088 , a 2-track route that penetrates miles into the Big Pryor hiking, riding and resource protection area. That area should be kept intact, without motorized traffic, for quiet public uses and wildlife habitat.	
124-17	We do not agree with the proposal to open road 2088 on Big Pryor to motorized use because doing so would impact deer and potential elk habitat.	
129-18	The Pryors Coalition also strongly recommends against opening #2088 to motorized use. This area could, like Punchbowl, be good secure habitat for deer and elk. The Pryors Coalition 9 Road #2088 also goes through some culturally sensitive areas. In the Cultural Resources part of the DEIS the Forest expresses concern about both Alternatives B and C.	
333-1	#2088 should not be open to motorized use west Crater Ice Cave. I want this area preserved for quiet and reflective use and wildlife.	
403-4	Also Route #2088 should not be open to motorized use into the Big Pryor North Hiking, Riding, and Resource Protection Area. Keep this area for the quiet users including wildlife.	
Summary of Comments: Road #2088 should be closed to motorized use to provide secure habitat for wildlife, including deer and elk.		
Response: A 2.2 mile section of Road #2088 to the east of the junction with Road #2095A would partially address the above concerns. The remainder of Road #2088 would be designated with a season of use to minimize road damage during spring break up. It is recognized that closure of the designated portion of the route may potentially benefit wildlife. However, other resources, such as recreation opportunities and access to range improvements, were also considered during the travel planning process. The Forest Service believes that designation of portions of Road #2088 with a season of use is a reasonable approach to management of this route..		

Subject: Wildlife		Response #: WL-10, Route #20972 (Roberts Bench)
Letter-Comment #: 386-20	Road #20972 (Roberts Bench) should be closed to motor vehicles to protect soil, wildlife habitat, and open space (as promoted in the CNF '04 DEIS).	
Response: In the FEIS Alternative B Modified, the first 0.59 mile of Road #20972 would be designated for motorized use. The remainder of the road would not be designated. There are no specific soil or wildlife habitat concerns associated with maintaining the first 0.59 miles of this route.		

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Subject: Wildlife		Response #: WL-11, Type of User
Letter-Comment #: 387-7	Heart monitors were put on elk in Yellowstone Park and the heart rate and flight distances were recorded as snowmobiles and cross country skiers went by. (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.). Elk were disturbed twice as much from non-motorized passer bys as from motorized. This discovery can be transferred to ATV and motorcycle use in the summer in relation to hikers and not to mention the impact on wildlife from dogs. Motorized users rarely take pets with them and as in Bozeman we are seeing a huge impact from dogs on our public land. The Forest Service must take this information in to account when deciding the allowed uses of our federally managed public land.	
Response: The reference to Ward and Cupal (1976) was reviewed and is consistent with analysis located within Chapter 3 of the FEIS. The effects of both motorized and non-motorized uses (including pets) on elk have been evaluated and described in the Wildlife section of Chapter 3. To analyze the general effects of motorized and non-motorized routes on wildlife, a one km buffer on each side of a route was used as suggested by Ruediger (1996). This is considered the “virtual footprint” (Forman et al. 2003) of the route on the land. This is an average, but the true impacts of routes vary significantly with terrain, vegetation, amount and types of use on the route, species-specific behavior, and other factors.		

Subject: Wildlife		Response #: WL-12, General Wildlife Impacts
Letter-Comment #: 66-47	The impact of OHV recreation on wildlife has been overstated by the agency and wildlife biologists. First, wildlife populations are at all time high (http://www.mtstandard.com/articles/2005/11/30/outdoors/hjjeigjjcefjb.txt) at the same time when OHV use is increasing. If there is any impact to be identified, it appears that it should be that the positive impact associated with increasing OHV use and increasing wildlife populations. Secondly, OHV use does not kill wildlife. Wildlife coexists just fine with OHVs. This was recently confirmed again by a study in Yellowstone Park which found that “Most elk, bison and trumpeter swans barely reacted last winter to the presence of snowcoaches and snowmobiles in Yellowstone National Park, according to a study released Tuesday. Scientists watched more than 2,100 interactions between over-snow vehicles and wildlife last year to try to determine how they responded. Of those, 81 percent of the animals had no apparent response or they looked and then resumed what they were doing, the study said” (http://www.helenair.com/articles/2005/12/14/montana/a10121405_04.prt and http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf). It appears that the disturbance of wildlife by OHV issue including wildlife corridors is being exaggerated to further the conversion of multiple-use lands to non-motorized lands....Hikers and wolves impact wildlife more than OHV use yet hikers and wolves are unrestricted....Some interests are pushing the wildlife corridor concept as a reason to close areas to motorized use....Significant issues must be answered before this concept can be given any credibility. Issues include: 1. Why would wildlife follow physically challenging basin divides where food and water is scarce versus other corridors? They don't. This is easily verified by open areas such as McDonald Pass of the jagged areas of the continental divide where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossing that we have observed in other area that are more favored by wildlife. 2. There is no data or credible documentation that the continental divide or other basin divides are favored for wildlife migration. Especially theories that purport that wildlife will migrate form Mexico to Canada. This is counter to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support the wildlife hypothesis. 3. The lack of authorization or mandate from congress for this sort of designation and use of public land. 4. The socioeconomic issues associated with the attempt to use the wildlife corridor concept to convert multiple use lands to defacto wilderness.	
250-3	On BLM lands along the south face of Red Pryor Mountain, is a network of roads. These roads where often used by many individuals for access to the mountain. Bighorn sheep, horses, bears, etc....are abundant in the area and the roads do not seem to impact them. Certainly the existing roads on USFS lands do not impact the wildlife in the manner in which the opposition claims.	

Subject: Wildlife		Response #: WL-12, General Wildlife Impacts
411-53	The CNF statement that a 1-kilometer wide impact area exists on all trails and roads is an opinion of the forest service and does not have proven science to support this issue. It exaggerates the footprint on the forest to uneducated people. The real on the ground width on the trails and roads should be used and gives an accurate number of miles and acreage that is being used by the public.	
421-34	According to the Yellowstone Elk Survey, there are no findings that the motorized sports affect the Elk any different than the non-motorized traffic yet the motorized sports are having to pay the price of old studies that could have conclusions to reach either side of the issue. If studies are done to determine the affects on wildlife and the studies find that there are no direct affects from motorized use, how can the Forest Service say they are closing the areas to preserve the wildlife that the motorized users are not bothering? ...With this in mind, we ask that those closures to OHV use designed to protect identified habitat be dropped from this plan, allowing the research project to move forward.	
Summary of Comments: Questions that motorized use actually affects wildlife.		
Response: The majority of literature and research regarding the effects of human activities on wildlife support the conclusion that motorized use has greater adverse impacts than non-motorized use. The literature does not support the notion that OHV use has a positive impact on wildlife. Detailed discussions and literature citations regarding effects of roads, motorized (including ATV's) and non-motorized use on wildlife are in the Affected Environment – Sensitive Species: Grizzly Bear, Affected Environment – Management Indicator Species: Elk, and Affected Environment - General Wildlife sections of the FEIS. Additional information is in the wildlife report in the project file.		
The Affected Environment - General Wildlife section of the FEIS discusses types of wildlife susceptible to being killed by motorized vehicles on various types of roads. Additional information is in the Affected Environment - General Wildlife – Mortality section of the wildlife report in the project file.		

Subject: Wildlife		Response #: WL-13, Robertson Creek Area
Letter-Comment #: 421-19	All existing roads should remain open. A way to connect trails should be explored and implemented. Trails 2008, 2008A, & 20084 should remain Open along with trails 2009 & 20094 with no seasonal closures. They should remain open all the way and dead end at the mines, 1 1/2 to 2 miles past where 7 begins. No Elk Security because there are no elk in this area due to the wolves driving them out. 20094 & Robinson Creek are the only 2 access points from Red Lodge to the Wyoming border.	
Response: Seasonal closures are in effect in the Robertson Creek area to protect elk winter range. We recognize that elk use of this area has declined over the past few years, but the reasons for the decline are not known. Based on discussions with Montana Fish, Wildlife and Parks, recent elk movements indicate that elk will likely reoccupy the winter range in the near future. Thus, seasonal closures will remain in effect to facilitate that reoccupation.		

Subject: Wildlife		Response #: WL-14, Grizzly Bear - Delisting
Letter-Comment #: 66-100	The current analysis does not adequately consider grizzly bear delisting under the Reasonably Foreseeable actions. This action is imminent...Other pended delisting of endangered species must also be considered.	
Response: Grizzly bears were delisted effective April 30, 2007 as described in the Affected Environment – Sensitive Species: Grizzly Bear – Regulatory Framework section of the FEIS. To help prevent future relisting, the Custer National Forest will abide by the standards for management of grizzly bear habitat as directed in the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests (USDA Forest Service, April 2006) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, March 2007). Bald eagles were delisted effective August 8, 2007 but were not analyzed because they typically occur on the District during winter, and winter over-the-snow travel is not part of this project. Canada lynx are not expected to be delisted in the foreseeable future. Gray wolf delisting will become effective March 28, 2008. Least tern and black-footed ferret habitat does not occur on or near the Beartooth District, thus these species were not analyzed.		

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Subject: Wildlife		Response #: WL-15, Grizzly Bear – Motorized Use Effects
Letter-Comment #: 461-68	Taken together, these threats and the precarious status of the grizzly population indicate that the grizzly is indeed on a trend towards listing and the Custer must take appropriate actions to prevent that from occurring. Analysis of the effects of increased motorized use and access on the grizzly are inadequate and do not fully evaluate how increasing use in these areas will contribute to the trend towards re-listing of the grizzly, or even how the effects on grizzly will be minimized, as required in the E.O. Finally, the analysis of sensitive species and wildlife generally does not satisfy the requirement of the National Forest Management Act that the Forest Service must ensure that a diverse population of wildlife will be maintained in the planning area. (See 16 U.S.C. § 1604(g)(3)(B)). There is no indication by the analysis presented that a diverse wildlife population will be maintained.	
Response: The Yellowstone grizzly bear population was delisted effective April 30, 2007, and thus is not on a trend toward listing. To help prevent future relisting, the Custer National Forest will abide by the standards for management of grizzly bear habitat as directed in the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests (USDA Forest Service, April 2006) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, March 2007). Discussion on effects of increased motorized use and access on grizzly bears has been added to the Environmental Consequences – Sensitive Species: Grizzly Bear in the FEIS to address that portion of the comment. Wildlife diversity is addressed through the concept of focal species as discussed in the FEIS Affected Environment – General Wildlife.		

Subject: Wildlife		Response #: WL-16, Grizzly Bear – Cumulative Effects
Letter-Comment #: 467-25	For grizzlies, similar to Lynx, the DEIS reaches the flawed conclusion that "[g]iven that over 96% of the [Primary Conservation Area] and over 91% of the biologically suitable habitat outside the [Primary Conservation Area] would continue to be secure habitat under all alternatives, cumulative effects of past, present, and reasonably foreseeable future actions is expected to be small." DEIS at 3-161. The conclusion is flawed because, like the DEIS' analysis for lynx, it ignores the fact that cumulatively significant impacts can result from "individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.	
Response: Forest Service recognizes that generally speaking, individually minor impacts have potential to create cumulatively significant impacts. However, on Forest Service lands in the project area, the proportion of grizzly bear habitat inside the Primary Conservation Area (PCA) and biologically suitable habitat outside the PCA that could potentially have activities contributing to cumulative effects is a relatively small proportion of available habitat. In addition, the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests (USDA Forest Service, April 2006) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, March 2007) provide standards for management of grizzly bear habitat that the Forest Service must comply with. Forest Service adherence to the guidelines reduces potential for cumulative impacts of activities on Forest Service lands.		

Subject: Wildlife		Response #: WL-17, Cumulative Effects - Encroachment
Letter-Comment #: 66-101	The encroachment of residences into the forest is often the most significant factor contributing to the loss of summer and/or winter wildlife habitat. First, we request that the impact of these permanent encroachments be quantified and compared to the relatively minor impact that mechanized forest visitors have on wildlife habitat.	
Response: The Forest Service does not control the development of private land inholdings within the forest boundary. A short discussion of this impact is included in the FEIS in Environmental Consequences – General Wildlife – Cumulative Effects.		

Subject: Wildlife		Response #: WL-18, Cumulative Effects – Alternative C
Letter-Comment #: 425-7	Question: since the economic impact either for non-motorized use or motorized use is apparently not "cumulative" and "small", why not then select Alternative C which converts 13 miles of roads to administrative use only and adds seasonal restrictions on 27 miles of moderate and high risk routes and has the potential of having the lowest impact on wildlife (and Plant) mortality as well as having the least adverse effects on susceptible bird species.	
Response: The Forest Service is required to consider more than just impacts to natural resources and economics. Consideration must also be given to recreational/social issues. Alternative B was identified in the DEIS, and Alternative B Modified in the FEIS, based on information from the analysis which indicated they would provide a wide range of recreation access opportunities, while still providing for the sustainability of natural and cultural resources in the project area.		

Subject: Wildlife		Response #: WL-19, Secure Habitat – Motorized Use
Letter-Comment #: 107-1	The trail density and extensive OHV use allowed does not provide secure areas for wildlife that are essential for rest, nutrition and reproduction.	
307-24	The Forest Service has said that the Travel planning process does not allow them to designate non-motorized areas as suggested by the Pryors Coalition proposal. However, there is nothing preventing the Forest Service from not designating roads through the middle of these suggested areas so that they may be designated later in the Forest Planning process. For this reason, Road 2088 past Crater Ice Cave, Road 2093 (Cave Ridge Road), Road 20972 on Roberts Bench, and Road 2144 in the Punchbowl area should be closed. Closing these roads would also provide much needed secure wildlife habitat and in the case of Road 2088 protect the existing cultural resources.	
394-1	Alternative B fails to designate areas for protection of wildlife and other natural resources, and for quiet recreational pursuits. It is critical that significant blocks of this special landscape be set aside from the impacts of motorized use. We are disturbed and disappointed that Custer National Forest chose not to formally designate such areas in this Travel Plan. We believe that Forest regulations both allow and encourage such an action - as do principles of responsible land management. If such designations are not made in this Travel Plan then at least the opportunity to do so in future must be preserved in the choices of which particular routes to designate for motorized use. Acceptance of motorized use of routes #2088 on Big Pryor Mountain (including #2095A). Punchbowl route #2144, and an overabundant number of motorized routes up the southwest face will prevent appropriate designation of protected zones in the future.	
397-3	These areas (Pryors) need to be kept natural and off limits to all motorized vehicles to protect critical wildlife habitat and to provide the quiet solitude that I and many other users seek.	
467-32	Two-track route #2088 past Crater Ice Cave and route #2492 on Big Pryor Mountain's southwest slope should be non-motorized, in order to protect wildlife habitat....	
Summary of Comments: Secure habitat needs to be provided for wildlife. Road 2088 past Crater Ice Cave, Road 2093 (Cave Ridge Road), Road 20972 on Roberts Bench, Road 2492 (Bear Canyon Road), Road 2144 in the Punchbowl area, and Road 2095A should be closed.		
Response: Discussions for Roads 2088, 20972, and 2144 are addressed in the wildlife response to comments specific to those roads. In the FEIS Alternative B Modified, Roads 2093 and 2095A would be open to motorized use with seasons of use. On the southwest face of the Pryors, Roads 2018, 20182, and 2011 would also have seasons of use. The seasons of use were designed to minimize road damage during spring thaw, but would also protect wildlife during the time of year when the roads are closed to motorized vehicles. The effects of all routes proposed to be designated for public motorized use, including those without a season of use such as Bear Canyon Road (#2492), are contained in the Wildlife section of Chapter 3.		
On the southwest face of the Pryors, closure or non-designation of routes 2012, 24921, 20161, 2016, 20162, 2091H4, 2091H3, 2091H, 2091H2, 2091H1, 20911, 20912, and 20913 as proposed in Alternative B Modified would increase the acreage of secure wildlife habitat compared to the current situation and the no action alternative.		

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Subject: Wildlife		Response #: WL-20, Secure Habitat - Increases
Letter-Comment #: 396-12	Ironically, when it comes to wildlife security, many species have been increasing in population over the past several years with the current level of motorized use in place. Their habitat is not as fragile as some would have you believe because bald eagles return to our ranch yearly for as long as memory serves, unaffected by all the ranch activity in the immediate vicinity. Also grizzly bears, black bears, elk, deer, moose, and mountain lions have in recent years been much more prevalent on our valley ranch. This indicates that their existence is not severely affected by human presence. Grizzly bears are on the verge of delisting, and the recent Fish, Wildlife, and Parks Summit held in Bozeman concluded that Elk were overpopulated Statewide all once again attained with the current level of motorized use in the forest.	
<p>Response: It is recognized that the population of some species has increased over the past few years. Increases of some species such as grizzly bears, bald eagles, and elk can be attributed largely to conservation efforts undertaken by federal, state, and private entities. Given that, there remains a need to provide secure habitat as directed by documents including the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, March 2007), the Greater Yellowstone Area National Forests Grizzly Bear Amendment (August 2007), and the Montana Final Elk Management Plan (Montana Fish, Wildlife and Parks, January 2005). In addition, numerous studies have analyzed effects of human presence on wildlife. Discussions and literature citations regarding effects of various human activities on wildlife are in the FEIS, particularly in Affected Environment - Grizzly Bear, Affected Environment - Elk, and Affected Environment - General Wildlife. Additional information is in the wildlife report in the project file.</p>		

Subject: Wildlife		Response #: WL-21, Big Game - Elk and Big Horn Sheep
Letter-Comment #: 124-21	Although there are no elk in the Pryors proper (although there are elk in the northern part of the Pryors in the Crow reservation) we believe the travel plan does not sufficiently address the potential for elk to populate the rest of the Pryors. For that to happen, sufficient areas of habitat such as calving grounds need to be designated and any motorized travel eliminated. Alternative C would be much more favorable to elk propagation.	
165-2	As for wildlife, it would be an excellent idea to establish quiet zones to encourage growth of the elk and big horn sheep populations in the Pryors.	
<p>Response: Motorized travel as shown in Alternative B Modified would not preclude elk from repopulating the Pryors, nor would it preclude expansion of the big horn sheep population. Seasonal closures designed to minimize road damage during spring thaw would also protect elk during calving season. Seasonal closures for elk protection on the Beartooth Mountains portion of the District extend until April 15 or May 15, depending on the location. Seasonal closures in the Pryors would extend until May 22 or June 15, depending on the location, and thus would provide protection during calving season should elk reoccupy the Forest Service portion of the Pryors in the future.</p> <p>The big horn sheep population in the Pryors has increased since 2003.</p>		

Subject: Wildlife		Response #: WL-22, Big Game – Elk and Deer
Letter-Comment #: 288-6	The Forest's Preferred Alternative B is not the best for wildlife. In the DEIS white-tailed deer and mule deer are identified as "habitat indicator species", and "key species". However they are not analyzed because the Forest says the "analysis for elk serves as a surrogate for white-tailed deer", and "impacts are expected to be similar for" elk and mule deer. (DEIS pages 3-15, 153). But there are no elk in the Pryors, although there were historically and should reintroduction occur habitat should be set aside and managed for elk. The FS concluding that Alt c would provide the lowest road density in both Units thus elk security would be highest is further evidence for adopting Alt. C.	
307-25	As it now stands there are inadequate roadless areas to provide needed protection for deer and potentially elk.	
487-3	The Forest Service has a direct and specific duty to protect and maintain the land for viable populations of elk and deer in their habitat in the Pryors. This responsibility trumps the recreation desires of any particular group of recreationists who may wish to use a road or trail or any decision to add impacting roads or trails to the permanent National Forest road system.	
<p>Response: The standard method for analyzing potential impacts to deer is to use elk as a surrogate. Elk, and thus deer, were analyzed for the Pryors as discussed in the FEIS Affected Environment – Management Indicator Species: Elk.</p>		

Subject: Wildlife	Response #: WL-22, Big Game – Elk and Deer
The afore-mentioned section in the FEIS describes why the elk analysis also serves as analysis for mule deer and white-tailed deer. It is recognized that Alternative C would provide the lowest road density relative to elk and deer habitat. However, FEIS Alternative B Modified would not result in unacceptable resource trade-offs, while providing reasonable motorized opportunities.	

Subject: Wildlife	Response #: WL-23, Wildlife Habitat-General
Letter-Comment #: 254-2	In creating a travel plan for this unique wilderness I urge you to adopt Alternative C. This is not to prevent people from enjoying the Pryor Mountains, but to reduce our impact on the wildlife and their habitat. The sub-alpine meadows are especially sensitive to off-road use and as roads become wet and muddy, they are widened by people going off-road in order to pass.
254-3	As the agency in charge of our National Forests you are to protect their biodiversity while allowing for multiple use. If we allow unregulated vehicle use in the Pryors than we are allowing for only one use: the noise, pollution and destruction of valuable habitat will ruin the area for others, not to mention the animals and plants who have no where else to go. Quiet use is critical in maintaining this wilderness for all to benefit and enjoy.
Response: Unregulated, cross-country vehicle use would not be authorized in the Pryors. Vehicle use would be regulated through designation of routes where motorized vehicle use would be allowed, non-designation of other routes where motorized vehicle use would not be allowed, and seasons of use on specific routes to minimize road damage during spring thaw. These measures would minimize damage to habitat, including sub-alpine meadows, and other resources while allowing for multiple use of the National Forest.	

Subject: Wildlife	Response #: WL-24, Analysis – Motorized Trails
Letter-Comment #: 66-97	The road density evaluations must also consider the viable alternative of closing a reasonable number of routes during hunting season and other critical seasons and then opening them during the summer recreation season. This strategy would effectively address road density criteria without nearly as many motorized closures as proposed.
307-7	Conversion of Roads and Trails...If it means taking those tours out of the road density statistics for wildlife analysis, then they should remain "roads".
Response: Motorized trails were included with roads in the road density analysis for lynx, wolves, grizzly bear, wolverine, elk, bighorn sheep, and general wildlife-indirect effects. Road density was not used as a criterion for determining if individual routes should be designated or not. More detail on analysis methods is in the project file.	

Subject: Wildlife	Response #: WL-25, Analysis - Data
Letter-Comment #: 387-6	Wildlife studies from the past are full of possible scenarios that at the time were all that a biologist had to predict the possible impact of multiple uses on wildlife. The last few years have brought us actual true data that must be used by the Forest Service and the old antiquated predictions must be discarded. If the "Best Available Science" is not used in formulating the travel plan document your conclusions will be arbitrary and capricious.
Response: The most recent data available during analysis was used to address potential impacts to wildlife. Descriptions of methods used are present in the project file.	

Subject: Wildlife	Response #: WL-26, Analysis – Road Density
Letter-Comment #: 66-98	The Forest Service should discard the original “road density guidelines” and develop new guidelines that reflect the habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by assumptions should not be used when true science and actual data is now available.
387-9	Because of the true science that has been gathered by this study on the bears in the Swan valley, I request that the Forest Service discard the original "road density guidelines" and initiate new guidelines that reflect the habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by mere predictions and assumptions must not be used when true science and actual data is available.
Response: The guidelines used for the project grizzly bear analysis were based on percent secure habitat as described further in the FEIS Affected Environment – Grizzly Bear. Direction for the Forest Service to use secure habitat standards is contained in the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater	

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Subject: Wildlife	Response #: WL-26, Analysis – Road Density
Yellowstone Area National Forests (USDA Forest Service, April 2006) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, 2007).	

Subject: Wildlife	Response #: WL-27, Noise - Motorcycles
Letter-Comment #: 396-11	Like most other motorcycle riders in the forest, I ride a 4-stroke machine that is relatively quiet. I would much rather see a decibel level restriction implemented in certain areas than to have these areas closed completely. This would easily be accomplished by eliminating the noisy 2-stroke machines from certain areas. I have encountered all forms of big game many times, and they have usually simply watched me ride past them. On the other hand, there have been studies that indicate that big game is startled much quicker by a hiker or a horse than a motorized machine because of the element of surprise.
Response: The Custer Forest Plan standards for management of wildlife include “where necessary to protect wildlife values, access and/or traffic will be restricted in key wildlife habitats during critical periods (Custer National Forest Management Plan, p. 18.). Instituting decibel level restrictions in lieu of closures would not meet the intent of this management standard. Also, it is recognized that non-motorized use can affect wildlife, including big game, and in some cases can be more disruptive to wildlife than some types of motorized use. However, the majority of research and literature regarding the effects of human use on wildlife supports the conclusion that motorized use has greater impacts due to the distance that noise can travel, and because motorized users can travel further faster, resulting in disturbance impacts over a much greater area and thus affecting a larger number of individual animals.	

Subject: Wildlife	Response #: WL-28, Noise Levels
Letter-Comment #: 425-23	This document (DEIS) we believe does not adequately define a range of noise, in decibels, for all motorized vehicles using authorized and unauthorized Forest Roads. Nor does this document provide adequate acceptable decibel ratings for all motorized vehicles to prevent any adverse reaction to wildlife - particularly as related to birds, migratory and others, causing, as stated, "panic flight"; damage to eggs"; and "aggressive attacks" etc.
Response: A discussion of decibel levels of motorized vehicles is included in the FEIS Affected Environment – General Wildlife- Habitat Modification/Changes to Behavior - Motorized. Response of wildlife in general to noise is also discussed in this FEIS section. Response of songbirds to specific noise levels is in the FEIS Affected Environment – Migratory Birds – Disturbance. Apparent effects of specific noise levels are quite variable depending on species, vegetation, terrain and other factors. Thus, specifying acceptable decibel ratings relative to wildlife during the project planning process is not practical. However, the Montana sound law (MCA 61-9-418) requires a 96 decibel sound limit maximum for motorcycles and ATVs operated off-highway on public lands.	

Subject: Wildlife	Response #: WL-29, Elk
Letter-Comment #: 387-34	With regards to the Elk studies that your district is using in the Travel Management Plan, the first study you refer to was done by Canfield 1999. Ms. Canfield is a board member of the Wildlife Society and we believe the information she has contributed to your decision is bias in nature. Today Elk populations are over target numbers in 64% of the 44 Elk Management Units in Montana yet you close areas for Elk security. Quentin Kujala, FWP Wildlife Management Bureau Chief, stated on December 8th, 2007 at the Elk Summit in Bozeman, "Motorized access is important for hunter access and the control of elk population". CBU requests that you address the ability to control the population of elk in your forest through hunting by increasing access by motorized vehicles.
Response: Many other references in addition to Canfield (1999) were used in the project elk analysis (see FEIS Affected Environment – Management Indicator Species: Elk). Regardless of how elk populations compare with target numbers, the Custer Forest Plan standards for management of wildlife include “where necessary to protect wildlife values, access and/or traffic will be restricted in key wildlife habitats during critical periods (Custer National Forest Management Plan, p. 18.) In addition, management of elk populations is under the jurisdiction of Montana Fish, Wildlife and Parks, not the Forest Service.	

Subject: Wildlife		Response #: WL-30, Breeding Season
Letter-Comment #: 413-3	...- in the breeding season the big majority of birds are dependent upon riparian and wetland areas. These are critical. This the season critical not only for bird, but for other wildlife. I really did not notice any recognition of this in Section 3.1.2 (Issue #8: Wildlife and Habitat, page 3-148 and following pages.	
Response: Recognition of breeding season for birds is included in the Affected Environment – Migratory Birds – Habitat Alteration section of the wildlife report in the project file. For other wildlife, breeding season is recognized as follows: 1) Gray Wolf (in terms of den and rendezvous sites): FEIS Environmental Consequences – Threatened and Endangered Species: Gray Wolf – Direct and Indirect Effects – Effects Common to All Alternatives; 2) Wolverine (in terms of den sites): FEIS Affected Environment – Sensitive Species: Wolverine and Environmental Consequences – Sensitive Species: Wolverine – Direct and Indirect Effects – Effects Common to All Alternatives; 3) Bats (in terms of maternity colonies and sites): FEIS Affected Environment – Sensitive Species: Bat Species and Environmental Consequences – Sensitive Species: Bat Species; 4) Bighorn sheep (in terms of lambing): FEIS Affected Environment – Management Indicator Species: Bighorn sheep; and 5) Wildlife in general (in terms of breeding areas, reproduction and rearing of young): FEIS Affected Environment – General Wildlife.		

Subject: Wildlife		Response #: WL-31, Birds
Letter-Comment #: 425-5	Question: why have more roads and trails as in Alternative B when roads and trails cause disturbance to birds?...We question your logic on this issue of Environmental Consequences, to Migratory Birds.	
Response: Alternative C would potentially have the least impact on birds, but this is not the only resource considered during route designation. The Forest Service believes that both motorized and non-motorized uses are legitimate and appropriate uses of the national forests. The travel planning process was designed to analyze the effects of various modes of travel, compare the relative merits and trade-offs of reasonable alternatives, and ultimately determine where opportunities for those uses could be provided. The Record of Decision documents the Forest Supervisor’s conclusions regarding the issues and the rationale for making his choice of a Beartooth Travel Management alternative.		

Subject: Wildlife		Response #: WL-32, Analysis - Maps
Letter-Comment #: 467-26	A map disclosing the spatial extent of the route system relative to wildlife habitat would be extremely helpful and seems a logical component of the Forest Service’s hard look duty, providing both the Forest Service and the public with the ability to identify problematic routes relative to wildlife populations and habitats	
Response: Due to the number of wildlife species present on the District, it is not practical or possible to provide maps of habitat for all species. However, maps showing routes relative to habitat for elk, big horn sheep, wolverine, and grizzly bear are in the project file.		

Subject: Wildlife		Response #: WL-33, Lynx Analysis Units
Letter-Comment #: 461-67	The Canada Lynx section was one of the few actually separated into units, but these were based on the Lynx Conservation Assessment and Strategy, not the Pryor or Beartooth unit as elsewhere in the DEIS. However, the Pryor Mountain Lynx Analysis Unit (LAU) only represents a small portion of the area evaluated, which includes three larger LAUs in the Beartooths. This average road density data based on LAUs is not valid for the Pryor LAU, where the road density is much larger (0.6 mi/sq mi in No Action).	
Response: The Lynx Conservation Assessment and Strategy (Ruediger, Bill, et al. August 2000) and the Northern Rockies Lynx Management Direction Record of Decision (USDA Forest Service, March 2007) direct the Forest Service to conduct analysis based on Lynx Analysis Units. Lynx analysis for this project was conducted based on that direction as described in the FEIS Affected Environment – Threatened and Endangered Species: Canada Lynx.		

Subject: Wildlife		Response #: WL-34, Lynx Direction
Letter-Comment #: 411-49	A record of decision for the long awaited “Northern Rockies Lynx Management Direction” FEIS was finally signed on March 23, 2007. While the PNF is not within the project area, this document comprises the best available information for management of lynx and should be considered in development of this travel plan, even if it requires a modification of the Forest	

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Subject: Wildlife		Response #: WL-34, Lynx Direction
	Plan.	
467-22	For lynx, it appears that the DEIS conflates compliance with the LCAS programmatic guideline for backcountry routes with no impacts. See DEIS at 3-156.	
<p>Response: The lynx analysis was based on direction provided in the Northern Rockies Lynx Management Direction Record of Decision (USDA Forest Service, March 2007) and the Lynx Conservation Assessment and Strategy (LCAS) (Ruediger, Bill, et al. August 2000). Guidelines in the LCAS are based on road density by lynx analysis unit. Comparison of road densities in the FEIS Affected Environment – Canada Lynx and the LCAS programmatic planning guidelines show that all alternatives meet the guidelines.</p>		

Subject: Wildlife		Response #: WL-35, Baseline Condition
Letter-Comment #:		
467-21	The "existing baseline condition" has already caused an existing baseline impact to wildlife that must be disclosed and accounted for. This is particularly important given the number of non-system routes disclosed in Appendix C that have never been properly addressed through NEPA. From our review the impact analysis provides a textbook example of agencies improperly using a shifting baseline to accommodate additional use and degradation.	
467-23	There is also no discussion concerning how the existing baseline condition is affecting lynx or how that baseline has shifted since the 1987 Travel Plan. With lynx, an ESA-listed species, as with other protected species, the status quo is patently unacceptable and the Forest Service has an obligation to not simply acquiesce to the status quo but to actually conserve the species and make every effort to restore habitat - in particular given the absence of adequate Forest Plan guidance for lynx conservation.	
<p>Response: The Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area, Interagency Conservation Strategy Team, March 2007; and the Greater Yellowstone Area National Forests Grizzly Bear Amendment, August 2007 provide direction regarding the appropriate baseline to use for grizzly bear analysis.</p> <p>Guidance for lynx conservation is contained in the Northern Rockies Lynx Management Direction Record of Decision (LMD) (USDA Forest Service, March 2007) and the Lynx Conservation Assessment and Strategy (LCAS) (Ruediger, Bill, et al. August 2000). The LMD does not specifically discuss baseline condition. However, it alludes to it by requiring monitoring of snow-compacting activities compared to the period 1998 to 2000. This does not apply to the Beartooth Travel Management because over-snow activities are not part of the District's current travel planning process. The FEIS Alternative A includes all motorized routes identified in the 1999-2000 inventory, including non-system routes, except for those that would not be designated for public use under any action alternative. Thus, Alternative A can be considered the baseline condition.</p>		

Subject: Wildlife		Response #: WL-36, Lynx Designation Criteria
Letter-Comment #:		
467-24	Even without these flaws, the ultimate determination for lynx - that "[a]ll alternatives are consistent with the laws, regulations, policy, and Federal, Regional, and State direction, the Custer National Forest Management Plan, and the Northern Rockies Lynx Management Direction" - is conclusory, does not satisfy Executive Order 11644's designation criteria, and is unsupported by the DEIS' analysis of impacts. DEIS at 3-157.	
467-27	Moreover, it would be helpful to identify opportunities to affirmatively restore habitat. For example, the Forest Service did, on its website, provide a map containing potential lynx habitat. The logical next step would be to take that map, overlay each alternative, and also consciously identify opportunities where the elimination of a route or routes through decommissioning or obliteration would enhance the potential habitat. The DEIS' general maps of route locations, because they only include the routes themselves and administrative boundaries, gives a skewed view of the land. Preparing a spatial map containing route locations and habitat locations - as well as the location of other important resources, such as water - would also assist the Forest Service in identifying quiet use recreation enclaves or other areas wherein motorized use should be prohibited.	
<p>Response: Designation criteria relative to lynx is not specified in the Executive Order. However, applicability to lynx can be inferred in Sec. 3 (1) and (2), and Sec. 9 (a). The Beartooth Travel Management plan satisfies Sec. 3 (1) and (2), which apply to location of areas and trails, because: a) areas are not being designated, and b) routes proposed to be converted to motorized trails already exist on the ground, thus they are already located.</p>		

Subject: Wildlife	Response #: WL-36, Lynx Designation Criteria
Relative to Sec. 9, analysis of affects to lynx was conducted based on the direction developed to reduce or eliminate adverse effects of land management activities on lynx in accordance with the Northern Rockies Lynx Management Direction Record of Decision (LMD) (USDA Forest Service, March 2007) and the Lynx Conservation Assessment and Strategy (LCAS) (Ruediger, Bill, et al. August 2000).	

Subject: Wildlife	Response #: WL-37, General
Letter-Comment #: 406-4	Wildlife is and always will be one of the forest resources; however, especially in the Pryors, wildlife seems to have lost the status of resource. Please take a fresh look at the effect motorized use has had on the wildlife resource.
Response: The effects of roads and motorized use on wildlife were analyzed in detail for specific species and for wildlife in general. Detailed information is available in the FEIS Wildlife and Habitat, and in the project file.	

Subject: Wildlife	Response #: WL-38, Birds - Monitoring
Letter-Comment #: 425-6	In the event if Alternative B becomes the Preferred Alternative for this section of the Custer Forest Travel Plan, YVAS must insist that in the final Record of Decision, relative sections of Alternative C concerning migratory birds need to be incorporated into the Preferred Alternative and that a monitoring plan must be established to show without reasonable doubt that impacts are not occurring.
Response: The migratory birds section of the DEIS was reviewed, but the “relative sections” the commenter was referring to could not be determined and therefore it could not be addressed. It is recognized that Alternative C may potentially have the least impact on migratory birds, but this is not the only resource considered during the travel planning process. The Forest Service feels that the FEIS Alternative B Modified would not result in unacceptable resource trade-offs. Compliance monitoring has been incorporated as a part of all alternatives. Although compliance monitoring doesn’t specifically address migratory birds, public compliance with the Beartooth Travel Management plan would help minimize potential adverse impacts to birds.	

Subject: Wildlife	Response #: WL-39, Analysis – District Level
Letter-Comment #: 461-66	Just as in the Vegetation section, the DEIS lumped the whole district together in analyzing potential impacts to wildlife. For reasons explained above, this does not meet NEPA’s hard look requirement. In addition, the fact that the bighorn sheep and elk analysis were broken into different units demonstrates that the decision not to do the same for other specific species was arbitrary and capricious. Because the district was not consistently separated into units, it is difficult to adequately comment on the alternatives.
Response: Analysis for the lynx was based on the Canada Lynx Conservation Assessment and Strategy (Ruediger, Bill, et al. August 2000) and the Northern Rockies Lynx Management Direction Record of Decision (USDA Forest Service, March 2007), which direct the Forest Service to conduct analysis based on Lynx Analysis Units. Analysis for grizzly bear was based on the Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests (USDA Forest Service, April 2006) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (Interagency Conservation Strategy Team, March 2007), which direct the Forest Service to conduct analysis based on grizzly bear subunits. The other species and species groups were analyzed separately for the Beartooth and Pryors Units in the FEIS. The exception is Migratory Birds, which were lumped because no analysis standards or guidelines are available for this wildlife group.	

Subject: Wildlife	Response #: WL-40, Analysis – New Information
Letter-Comment #: 66-96	Wildlife security criteria and standards in the forest plan are out of date. The science, data and findings as far as road density and impact of motorized vehicles on wildlife have changed significantly. This new information must be considered in this evaluation.
Response: Changes to Forest Plan criteria and standards are part of the Forest Plan revision process and are beyond the scope of this project. The most up-to-date information available was included in wildlife analyses. Citations are included throughout Chapter 3: Wildlife and Habitat and in Chapter 4: References - Wildlife of the FEIS.	

OPPORTUNITIES

<i>Subject: Opportunity</i>	<i>Response #: O-1</i>
<i>Letter-Comment #:</i> 44-1	There is a conflict of interests - mixed groups - using the West Fork Silver Run Trails, there are hikers, horseback riders and bikers. For public safety the trail should be one way only.
66-135	We request that the ties to the land that are part of our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative spur destinations and loops.
68-11	The only place on the section of Pryor Mountain Road from the junction with Crooked Creek Road and Dryhead Vista that becomes slick is at the Red Mud Catchment where there is a layer of the Amsden red clay. That section could be greatly improved by diverting the overflow from the catchment to flow through the culvert and not down the road. As it is now, vehicles slide there but never become stuck.
68-16	If the PMWHR northwest fence is ever rebuilt, 2009 at the earliest, road equipment will have to be brought in to construct an effective gate for vehicles. That would be an opportunity to improve the road immediately northwest of the fence by ditching and building up the roadbed.
68-21	The road leaving the junction with 2092 goes into the Commissary Creek drainage. The initial section is through clayey soil that is very slick when wet. Commissary Creek pools before it flows over the road. There is no culvert to protect either road or stream.
68-22	Less than a half-mile is a wooden cattleguard which is rotting. Soon it will be difficult for a wheeled vehicle to pass that point unless the Forest Service fills the ditch under the guard. Perhaps there are plans to replace the wooden cattleguard with a metal one.
68-25	The roads 2492 and 2814 become hellacious in the northern half of section 74 and the southern half of sections 28 and 27 in T 8S R 26E... There are places where the roads are steep and the drainage is directly down the road. Any soil and gravel has been washed out.
68-27	The section of 2850, Stockman Trail, between the junctions with 28507 and 28505 is one of the worst braided roads in the Pryors... The multiple parallel roads are subject to erosion even though they are on contour. Seasonal closure is not a solution to healing this quagmire. I recommend that this section be permanently closed.
299-3	The Billings Motorcycle Club would offer to adopt Trails 22 and 27 under the Adopt a Trail Program if they were allowed to remain open for motorcycle usage. We have an established record of working in concert with the Forest Service and Bureau of Land Management to preserve and maintain trails in a variety of other areas in the state of Montana. We are willing to provide the manpower to maintain these trails under the direction of you and your staff.
345-8	Create additional agency eyes and ears through a volunteer corps drawn from those participants in public meetings who have shown their commitment to the Pryors transcends issues of personal use. The volunteers could help post and maintain the "open" signs. Implement a no-nonsense campaign (through media, signs on the ground, volunteer corps) broadcasting the agency's intention to enforce the above.
421-16	The Horse backers need areas they can go to for easy day rides. So we need to have an area where we can control the weeds and have an easy trail. We believe that we can have this work in the Pryor's and also off of Meyer's Creek. The horse backers can work with the hiking community and CPA to make these trail systems easy for all to enjoy off of Crooked Creek Road and from the camp grounds. There could be a designating staging area for the horse backers down wind from the campground and there is another area that is north east that could be used.
421-20	The area off of Sage Creek Campground should have a trail system for non-motorized users. This area is up against the rims or south to the bluffs. Cliffs on, south of the main road. This is the only campground in the Pryors. We need a trail system to connect to the south side of the Pryor's. This is why we need to consider connecting trails off the main roads to the south side for non-licensed drivers to ride with their families under the 2005 Travel Rules.
421-38	Ben Bow Trail area is an ideal spot for camping and is gaining in popularity. An area should be allowed toward the mine for rough camping with parking access and should also remain open for all forms of multiple-use activity. A play area should be created in the center, and more looping trails should be created. Based on the 2005 Travel management Plan. Two new

Subject: Opportunity	Response #: O-1
	multiple-use trails should be built using grant money and volunteer work. 1A along the Nye Road should circle back to 2A and connect to the Switchbacks. Open riding areas should be open near the golf course. This area needs to connect back to the East/West rosebud area and Red Lodge. Under the 2005 Travel Manage Plan the forest Service should be looking for a way to connect to the communities and connect to areas together. Also, the Forest Service did not comment on the rock area that is open and is being used now. Just past the church turn off about 1 1/2 mile on the left side of the road. There is about 20 acres of rock and used for 4x4 rock crawling experiences. This is a rock pile and should be considered in the preferred Alt. B.
421-40	This is the area [Map 4, Area 1] near the ski hill and going toward the Paradise CampGround. This area is generally reserved for non-motorized use, but the three main roads should remain open as they are. More hiking opportunities should be created with the groups to allow for the development of a better trail systems map. During summertime use, the area off of private property should connect Area 1 to Area 5 with the use of an under 50" trail for all multiple uses that qualify under that heading. Eventually, Area 5 should be connected to East Rosebud. All spur roads should remain open for disperse camping.
421-47	Also need to create a loop in the middle of the Ben Bow trail to connect to the road. Also need to make the Ben Bow a day use for family that bring the non-licensed driver to ride, we can use the side of the road for and great a trail system connecting the trails together. We need to be able to connect the Ben Bow area to the Iron Mountain or Picket Pen to make routes!
461-33	We feel that in order for the Custer NF to ensure meeting the Executive Order mandate to minimize damage to soils, it should provide a plan and implementation schedule for removing any non-system routes after the release of the Beartooth District MVUM. Without such a plan the Custer NF's environmental analysis of soils in the planning area would be inaccurate since these non-system routes were not included in the current cumulative impacts analysis.
496-2	I am a member of the Billings Motorcycle Club, and we as a club will offer to adopt Trails 22 and 27 under the Adopt a Trail Program if they were allowed to remain open for motorcycle usage.
Response: The opportunities identified from your comments are outlined in Appendix E. They may be addressed as funding becomes available. We look forward to working with you.	

- End of Chapter 5 -