

Appendix G

Response to Draft SEIS Comments

Table G- 1 lists the letters received on the Draft SEIS (DSEIS). Table G- 2 displays the letter number, comment number, the actual comment (in *italics*) and the interdisciplinary team response. The entire content of letters providing comments on the DSEIS are available upon request.

Table G- 1 – Letter log for DSEIS Comments

Letter #	Name	Letter #	Name
1	Ryan Peterson	114	Amanda Garant
2 & 46	Dan McCuen	115	Pamela Green
3 & 41	Dan Zeier	116	Marie-Jose Unkown Donor
4	Lawrence Krizan	117	Anita Mcnamara
5	Terri Denton	118	Rick Poese
6	John Shotwell	119	Deb Regele
7	Montana Backcountry Hunters & Anglers	120	Mollie Simpkins
8	Bitterroot Ridgerunners	121	Dr. Tristan Sophia
9	Bob Chatriand	122	Robert Stevens
10	Kay Jensen	123	Jennifer Swearingen
11	Laine Family	124	Christi Weber
12	Bill Johns	125	Roth Woods
13	Jenny Sika, Montana Fish, Wildlife & Parks	126	Yeuleta Bradley
14	Becky Johnstone	127	Henry White
15	Beaverhead Outdoors Assoc	128	Jen Haley
16	Stan Spencer	129	Keith Haley
17	Jason Mancoronal	130	Colette Robinson
18	Kimberly Mancoronal	131	Jonathan Klein
19	Stanley Strizic	132	Cynthia Branter
20	Marvin Johnson	133	Craig and Jackie Mathews
21	Albert Trafelet	134	Glenn and Sandy Fischer
22	Lee J. Hiniker	135	Cliff Walter
23	Big Hole Snowmobile Club	136	Connie Walter
24	Fred Brewer	137	Patrick McKenna
25	Sally Cathey	138	David Steinmuller
26	Dennis Linneman	139	Grant Godbolt
27	Brian Berg	140	Hannah Howell
28	Kerry White	141	Hunter Howell

Letter #	Name	Letter #	Name
29	Joshua Ross	142	Jason Howell
30	Mike Shikany	143	Skip Olson
31	Tami Ingraham	144	Tim White
32 & 32a	Barbara Geller	145	Red Rock Lakes National Wildlife Refuge
33	Grant Barnard	146	BLM
34	Rory Erhard	147	Citizens for Balanced Use
35	John Todd	148	Defenders of Wildlife
36	Ron Spencer	149	Environmental Protection Agency
37	Julie Gandulla	150	Wayne Fischer
38	Henry Dillard	151	John Janik
39	Janine Stewart	152	Lelland Johns
40	Jeff Coiner	153	MSBT Law ¹
42	Jim Pollard	154	Gary Rillema
43	Craig Kahnke	155	John Boehmke
44	John Summers	156	David Ellenberger
45	Sonny Mazzullo	157	Katy Fast
47	J.D. Sauter	158	Rachel Garwin
48	Geoff Dyer	159	Doug Gledhill
49	Deven Serr	160	Doxey Hatch
50	James Forsman	161	Robert Miller
51	Lee Nelson	162	Mike O'Connell
52	Jake Wohlschlegel	163	Tom and Cathy Rechlin
53	Grete Gansauer	164	Anita Vasquez
54	Steven Enoch	165	Ivana Dzbova
55	Ken Watts	166	Dick Forehand
56	Ralph Guay	167	Barry Zuckerman
57	Holly Heinsmann	168	Mark Momberg
58	Consuelo Larrabee	169	Albert Tahhan
59	Josh Barksdale	170	Ken and Linda Pierce
60	Timothy Byron	171	Michael Ford
61	Craig Christopherson	172	Steven Barkley
62	Chip Clawson	173	Lee Bartlett
63	Capital Trail Vehicle Assoc.	174	Suzanne McDonald
64	Rebecca Durham	175	Patricia Dowd
65	Robert Ekey	176	David and Nike Stevens
66	John Farey	177	Cindy Cohan
67	Carolyn Fifer	178	Donald Bacon

¹ Letter submitted on behalf of Idaho State Snowmobile Association, the Bitterroot Ridgerunners, the Montana Snowmobile Association and the BlueRibbon Coalition.

Letter #	Name	Letter #	Name
68	Josh Dickinson	179	W.E. Beardsley
69	Jared Frasier	180	Amy Braach-Hart
70	William Grant	181	Gary Cvecich
71	Ann Halverson	182	Jim Hagenbarth
72	Laulette Hansen	183	Bret Hart
73	Rebecca Himsl	184	Brian Steadman
74	Dean Hoistad	185	Scott Stuber
75	Nick Hallgren	186	Robert Boll
76	William Hudson	187	Steve Larson
77	Robert Hughes	188	Ed Puccinelli
78	Raso Hultgren	189	Brian and Donna Aschliman
79	Wilma Immonen	190	Stephanie and Mike Becker
80	Karen Kaminski	191	Miriam Haley
81	Sharon Kepford	192	Michael Arvish
82	Jonathan Matthews	193	Orin Moses
83	David Montague	194	William Porter
84	Addrien Rovero's	195	Linda Prescott
85	Clarence Sanders	196	Ashton Loomis
86	Jeff Shryer	197	John Ascherman
87	Ron Spencer	198	Charity Brown
88	Richard Thweatt	199	John Caratti
89	Hannah Wentworth	200	Wayne Fischer
90	Barbara Aas	201	Chad Guthrie
91	Pat Connors	202	Mike Johnson
92	Greg Karlsgodt	203	Kristina Okonski
93	Tim Kepford	204	Rick Keeland
94	Nathan Hecht	205	Jody Loomis
95	Stephenie Ambrose	206	Brian Odenthal
96	Chris Connors	207	Ronald Paige
97	Bob Ambrose	208	Mark Schaffer
98	Terry Deal	209	Carl Schillhammer
99	Winter Wildlands Alliance, Greater Yellowstone Coalition & Montana Wilderness Assoc.	210	Jeff Schmerker
100	WildEarth Guardians & Friends of the Bitterroot	211	Troy Elmore
101	Billy Angus	212	Bill Antonioli
102	Connie O'Connor	213	Jeff Braun
103	Orville Bach	214	Chris Dildine
104	Eric Bindseil	215	Guyle Guderian

Letter #	Name	Letter #	Name
105	Norman A. Bishop	216	Brian Hardman
106	Alan Bradley	217	Mike Lyon
107	Dr. Lawrence Brouwer	218	Catherine McDonald
108	Carl Clark	219	Jesse Mosolf
109	William Crain	220	Judy Paige
110	Jim Dettmann	221	Mary Schonsberg
111	David Ellenberger	222	Wm. Scott Schonsberg
112	Lisa Fordham	223	Big Hole Valley Assoc.
113	Beverly Fowler	224	Dave and Laurie Schmidt

Table G- 2 – Comments and Responses

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
1-1	<p><i>I understand that there is a push to limit/eliminate snowmobile access to parts of the forest. The basis for this is potential motorized conflicts with wildlife. I feel that this is yet another cover for the agenda of non-motorized “conservation” groups to eliminate all motorized access to our forest. To my knowledge there have been no studies which have shown that “back-country” snowmobiling is affecting the health of wintering animals. To the contrary a recent study in Idaho showed that snowmobiles did not affect the wolverine populations or habits [sic].</i></p> <p>Response: Please see the response to comment 153-5. We assume this reviewer is referencing yet to be concluded/published research by Heinemeyer and Squires. Conversations with Mr. Squires (2016) indicate that although wolverines are present and reproducing in Idaho in spite of heavy recreational use, some level of effect to individuals may occur. These effects are disclosed in the SEIS.</p>
1-2	<p><i>I am an avid hunter and place the future of our big game herds at the top of my priority list yet I do not feel that there needs to be any further limitations placed on back-country snowmobiling. Off-trail riding in areas of known winter habitat are already limited as they should be. Most snowmobilers seek the deep snow of the remote mountains where there are no wintering animals to affect.</i></p> <p>Response: Although big game animals may not winter in the deep snow, there are other wildlife species that do, such as lynx, wolves, wolverine and grizzly bears. Please see responses to comments 153-4 and 153-5.</p>
2-1	<p><i>I...support proposal #4. I am a XC skier, backcountry skier, snowmobiler, mountain biker, hiker, hunter, fisherman, dirt biker, etc. who has lost the right to recreate on nearly half of the forest in the last ten years. I feel like the forest service did their part as the land managers, and don’t understand how, once again, our public land access is threatened by these environmental groups.</i></p> <p>Response: Your support of Alternative 4 is noted. Please refer to the “Purpose</p>

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
	of this SEIS” (DSEIS, pg. 6) for an explanation about why we are preparing the SEIS.
3-1	<p><i>In the 44 years of riding the back country of the B-D NF. I have seen no significant impact on the soil, watershed, or vegetation. The area looks no different than it did 44 years ago from the result of snowmobiles.</i></p> <p>Response: Your conclusions regarding the effects of snowmobile use on soil, watershed and vegetation resources on the BDNF are noted and quite similar to those described as effects common to all alternatives in all landscapes in the DSEIS (beginning on pg. 92).</p>
3-2	<p><i>On a very rare occasion, I may have encountered wildlife in the lower elevations while riding to the high country. Generally moose grazing in the willows that pay no attention to us.</i></p> <p>Response: Your personal observations of wildlife use in the area during the winter is noted.</p>
3-3	<p><i>Also user conflict never seems to be an issue – back country skiers may use snowmobile tracks to access the back country. There are many other areas that other winter users seem to prefer that are closed to mechanized travel. With that said I almost never encounter anyone other than snowmobile riders.</i></p> <p>Response: Your observations are noted.</p>
3-4	<p><i>I believe that the economic impact of snowmobiling the B-D N.F. is quite significant to the many small communities that border the Forest. Just drive by any convenient [sic] store, gas station, restaurants, motels, and other businesses on weekends during the winter months and you will see many snowmobile users spending money.</i></p> <p>Response: Your views are noted. Please see response to comment 26-3.</p>
4-1	<p><i>I want to point out some facts that seem to be brushed aside by those who seek more restrictions or prohibitions on snowmobile use. First, most of the private property within the area I use offers very limited snowmobiling because of inadequate snow cover, steep and rocky terrain, willow bottoms and open water. Only when there is deeper snow cover are snowmobiles able to safely [sic] navigate the snow corridors on these lands.</i></p> <p>Response: Your observations are noted.</p>
4-2	<p><i>Secondly, the same is true for the public lands that surround these privately owned and managed properties. But snowmobile travel is restricted even more with the added restriction of federal wilderness area and recommended wilderness area management policy, and/or State/Federal designated wildlife over-wintering protection areas. As currently managed by the USFS and the BLM, snowmobiling is limited to areas outside the wilderness designated areas and outside the recommended wilderness areas. These wilderness restrictions may not sound like a very large impact to snowmobiling areas when you use acreage as an indicator, but when you combine existing wildlife over-wintering</i></p>

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	<p><i>protections outside of these areas, timbered and rocky terrain, willow bottoms, occasional open water and unfrozen creek drainages, there aren't a lot of places and weather windows to use a snowmobile during the winter months.</i></p> <p>Response: Your observations are noted as to opportunities on public land to snowmobile.</p>
4-3	<p><i>I depend on snowmobiling in the winter to carry out my winter activities, provide alternate means of egress and access to my home during heavy snow fall and drifting periods, and to maintain an alternate means of travel around my community should the need arise. My winter activities include hunting, fishing, trapping, community service and recreational snowmobiling. I snowmobile within the currently designated snowmobiling corridors in the West Big Hole Ajax-Miners lake area, the North Big Hole Bender Cabin area, the Mount Evans and Miller Lakes area, the Mount Haggin Wildlife Management area, the Fleecer Range area, and the West Pioneers. It may sound like a lot of snowmobiling opportunities, but the natural limitations I described previously limit my access within these areas to a very small footprint. Without snowmobile opportunities in my area, my lifestyle, social values, safety and security would be unreasonably [sic] impacted.</i></p> <p>Response: Your views and observations are noted.</p>
4-4	<p><i>The existing terrain in my area doesn't allow for snowmobiling in designated areas without adequate snow cover. Typically 2 or more feet of snow is required to cover tree stumps, downed trees and large rocks in order to safely operate today's snowmobiles and prevent damage to the drive train or engine. Unfrozen lakes and creeks, protruding willows, bare ground and icy hillsides and cliffs prevent snowmobile travel on soils and vegetation otherwise disturbed by other human activity (foot traffic and horse traffic). Impacts to soil and vegetation by snowmobile travel would not change. Snowmobiles don't impact soils or vegetation when operated as designed and within existing travel restrictions. Our watershed need to be frozen and snow covered before snowmobiles are a viable travel mechanism. Snow covered trails provide safe and environmentally sound access to and through watersheds that would otherwise be disturbed by other human activity (foot traffic and horse traffic). Impacts to watershed by snowmobile travel would not change. Snowmobiles don't impact watersheds when operated as designed and within existing travel restrictions.</i></p> <p>Response: Your conclusions regarding the effects of snowmobile use on soil, watershed and vegetation resources on the BDNF are noted and quite similar to those described as effects common to all alternatives in all landscapes in the DSEIS (beginning on pg. 92). Please refer to the response to comment 99-14.</p>
4-5	<p><i>The areas surrounding me and the areas I access have existing restrictions on snowmobile activity to protect wildlife during the over-wintering periods and when wildlife travel to and from those areas. These have been managed by the</i></p>

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	<p><i>Montana FWP and are quite well documented and mapped for the publics information. Impacts to wildlife and wildlife habitat from snowmobile travel would not change. Snowmobiles don't cause wildlife disruption if operated as designed and outside the Montana FWP designated over-wintering areas and season. Additionally the federal and/or state designated snowmobile season is typically restricted to between December 2 to May 15, and it is against state and federal law to harass wildlife of any kind using a snowmobile.</i></p> <p>Response: We find this comment confusing. Our response assumes the reviewer's concern refers to Montana Fish, Wildlife, and Parks (MFWP) Wildlife Management Areas (WMA). Although MFWP WMAs do protect big game during the winter period, they only cover a small portion of habitats utilized by wildlife during the winter. The DSEIS displays important winter habitat for various wildlife species, much of which is outside the WMAs. Please see Appendices A-E in the DSEIS for mapped winter habitats analyzed in the DSEIS.</p>
5-1	<p><i>I am against the proposals listed in the above project plan that will have negative impacts on the citizens, economy with further denial and limited access within our federal forests. With 22,000 miles of roads in Montana closures already and planned closures to obliterate another 19 miles over the Lolo is unexceptable [sic]. Do not close any further roads or limit motorized access. Within the Draft Supplemental Environmental Impact Statement, Alternative 4 is the most reasonable and should be utilized if an option must be implemented.</i></p> <p>Response: This SEIS does not propose further closures or obliteration of roads, nor will it alter management of the Lolo National Forest. Motorized access to the BDNF is provided by numerous public roads located on private and other property from the State highway system to the BDNF boundary. The SEIS does not propose changes to motorized access. Rather, alternatives analyzed in the SEIS propose differing management of motorized winter <u>use</u> on the BDNF. Your support of Alternative 4 is noted.</p>
5-2	<p><i>The Mount Jefferson area is critical to the winter economic sustainability of those businesses in that area and allows snowmobile use to continue in this area.</i></p> <p>Response: Your views are noted. Please see response to comment 132-3.</p>
6-1	<p><i>The last three years I have ridden north of Yellowstone Park in Gallatin co. on designated snowmobile trails around the Big Sky Trail through the skyline ridge and sunlight basin to wapiti cr. There are endless areas to get off trail in this area that I have just scratched the surface. I have also ridden in the Cook City area that offers fantastic trails as well as back country riding. Snowmobiling is the life blood for both of these areas in the Winter when most of the tourists have gone home. These areas have my full support and I intent to visit every chance I get, and it should remain open forever!</i></p> <p>Response: The geographic areas identified in this comment are not located on</p>

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	the BDNF. The SEIS will not alter management of the Gallatin-Custer National Forest.
6-2	<p><i>I have ridden the Swamp cr. Area near Jackson with a friend [sic] of mine that knows that area intimately, past twin lakes and beyond. Not to mention, I have ride the areas extensively closer to home around Maxville past Altoona lake and beyond. Philipsburg is another of my old haunts that is honeycombed with trails and back country that are too numerous to [sic] without writing a book. Georgetown lake as well as well as [sic] Deerlodge have designated trails that I have ridden many times. To make a blanket statement that all of the Beaverhead Dearlodge [sic] national forest is [sic] ludicrous and has no credibility [sic]!</i></p> <p>Response: Thank you for identifying areas on the BDNF where you have enjoyed OSV opportunities. Because we are unable to identify the “blanket statement” referenced in the last sentence we cannot provide further details about the credibility of the statement.</p>
7-1	<p><i>As you may know, mountain goat populations are limited to very specific and limited mountain habitats that blow free of snow allowing goats ability to forage. They cannot survive stress or displacement by snowmobiles. For reasons not fully understood, many historic goat populations no longer occupy much of their former range. Once displaced, populations are very slow to recolonize former habitats. We request the B-D consult with MT FWP to obtain both historic and current winter goat habitats. Once such maps have been constructed, the adequate buffers for all winter motorized use need to be sufficient to prevent any motorized disturbance to any of the winter goat habitat. Cirques are favorite high making areas but unfortunately are often surrounded by mountain goat winter habitat. We suggest as a minimum the buffer should be ½ mile or more.</i></p> <p>Response: Winter range maps produced by MFWP and on-the-ground knowledge of local MFWP biologists were used in the big game analysis. Although not identified as a serious concern, MFWP biologists stated that although unlikely, mountain goat herds in the Clark Fork Flint, Pioneer and the Upper Rock Creek Landscape could potentially be affected from intermittent OSV travel (Pers. com. MFWP 2016). However, MFWP biologists identified no concern regarding impacts from these potential effects and identified no recommended measures needed to protect mountain goats. As such, the updated big game effects analysis discusses although there could be potential for effects to individuals and there is no evidence of negative effects to mountain goat populations from OSV travel. As a result, there is no recommendation from local MFWP biologists to buffer mountain goat winter habitat. See updated FSEIS.</p>
7-2	<p><i>As you may be aware, moose populations also are depressed. These depressed populations should not be subject to snowmobile induced stress. Therefore</i></p>

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	<p><i>moose, which sometimes winter habitat of conifer covered ridges [sic], should be delineated and prohibited from use. Likewise willow bottoms should be deleted from legal snowmobile areas.</i></p> <p>Response: Please see responses comments 99-10 and 100-24.</p>
7-3	<p><i>Deer and elk winter ranges are better delineated in most cases by both Forest Service and FWP biologists. However, the bull elk and mule deer buck component often winters far higher than the cows and calves and does and fawns and needs special consideration. Normally steep ridges provide suitable winter habitat for bulls and bucks. Often these habitats are interspersed in habitats commonly snowmobiled due to their higher elevations. We reemphasize the need to utilize the best possible winter habitat maps. Sometimes retired FWP staff have additional knowledge about historic winter use. We then urge the B-D to respect all wintering wildlife by prohibiting winter motorized use on historic and present winter ranges.</i></p> <p>Response: Thank you for your personal observations. Please see the response to comment 99-10. The SEIS analysis used current winter range maps produced by MFWP and on-the-ground knowledge of local MFWP biologists.</p>
7-4	<p><i>In addition, non game wildlife, including wolverine and lynx demand special attention. Wolverine denning occurs in deep snow areas and denning wolverines are very sensitive to disturbance. Lynx habitats are deep snow free of other predators until packed snowmobile trails allow other predators to occupy these deep habitats threatening the lynx.</i></p> <p>Response: Thank you for your personal observations/opinions. Please see responses to comments 99-10, 99-35 and 100-72.</p>
8-1	<p><i>BRR²generally supports the expanded analysis presented in the SEIS with respect to documenting the impacts of snowmobile activities to vegetation and wildlife and with respect to the “minimization criteria” as directed by EO 11644. We find the analysis to be thorough, relevant and consistent with the orders of the Ninth Circuit and District Courts. We believe that the analysis in the SEIS implies that no additional restrictions on winter access is justified, and we support that outcome for the Draft ROD for this action. We note that continued historical snowmobile access to Mt. Jefferson is particularly vital to BRR’s interests.</i></p> <p>Response: Your support of the analysis presented in the DSEIS, implications that additional winter motorized restrictions are not needed and support of snowmobile use in the Mt. Jefferson area are noted.</p>
8-2	<p><i>However, there is one glaring omission in this SEIS that we assert should be included. That is the issue of Rd 1260 in the Lost Trail area...a short section of Rd 1260 was included in a Trail Creek nonmotorized allocation in the 2009 B-D</i></p>

² BRR = Bitterroot Ridgerunners

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	<p><i>Forest Plan. The Agency freely admits that the inclusion of this segment of road was “unintentional” and has, on numerous occasions, indicated their desire to rectify the problem with a Forest Plan Amendment. Most recently you have indicated that the B-D Forest “may” be able to finally address the Rd 1260 issue in FY 2017 (letter to attorney Paul Turcke dated September 16, 2014). (letter to attorney Paul Turcke dated September 16, 2014).</i></p> <p><i>We believe that a discussion and eventual resolution of the Rd 1260 issue lies within the scope of direction by the Federal Courts. Essentially, the courts have ordered the B-D to fully disclose the analysis for snowmobile uses in the 2009 Forest Plan, to identify shortcomings and errors, and to propose remedial action as necessary. In the 2009 Forest Plan, the inclusion of Rd 1260 in a nonmotorized allocation was insufficiently documented and, in fact, unintentional. It is precisely this sort of error that the Court is directing the Forest to remedy... [BRR provides several recommendations for consideration in opening Rd 1260 to winter motorized use. Those recommendations are not included here but are available upon request]...BRR is determined to bring the Rd 1260 issue to closure one way or another. We have been patient in the face of Agency intransigence and bureaucratic obfuscations. The inclusion of Rd 1260 issue in this SEIS and subsequent ROD would be a great relief to all concerned.</i></p> <p>Response: The 9/16/14 letter referenced in this comment states “...we are awaiting a decision from the 9th Circuit Court of Appeals in the Wildlands CPR v. US Forest Service case. The Court has yet to rule on the adequacy of analysis in that case regarding allocation of areas to snowmobile use. We believe this ruling could have a bearing on any proposal and subsequent analysis to modify a non-motorized designation to allow snowmobile use...I am willing to consider amending the 2009 Forest Plan to allow snowmobile use on Forest Road 1260 in fiscal year 2017. Even at that time, I will have to weigh Forest priorities and resources for such a discretionary action”.</p> <p>The court decision referenced in the letter is described in the DSEIS (pgs. 4-5) and forms the purpose of the SEIS (DSEIS, pg. 6). The Court Order requires the agency to properly disclose the information underlying the Forest Service’s analysis of snowmobile impacts on big game and to adequately apply the minimization criteria to areas and trails designated open to OSVs. The contested portion of Road 1260 on the BDNF is located in an area allocated to non-motorized winter use under Alternative 6 Modified. Alternatives 1, 2 and 4 in the SEIS consider designating the area to OSV use. The purpose of this SEIS does not include consideration of designation of new routes open to OSV use.</p>
9-1	<p><i>I have been snowmobiling in the Pioneer Mt & Bye [sic] Way since 1970. I have never saw [sic] anyone bothering wildlife. They all move to lower ground. As far as doing harm to the land, when you are 4-6 feet above the ground how can you hurt it. Now for all the sores, café, motels, bar, gas stations in this area.</i></p>

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	<p><i>They pay taxes, hire people to work for them. They depend on snowmobiling to get them thru the winter. Please do you [sic] best to keep this area open.</i></p> <p>Response: All alternatives analyzed in detail proposes keeping the Pioneer Mountain Scenic Byway (Wise River National Recreation Trail) open to OSVs. Areas remaining open to OSV use adjacent to the Byway vary by alternative.</p>
10-1	<p><i>This letter concerns snowmobiling in the BDNF, which should NOT be banned in the winter, snowmobiling is by far (possibly as high as 97%) the most popular winter sport over snowshoeing and cross-country skiing. All winter use is over the snow, so nothing is damaged, which is evident after the snow melts. There is a lot of wilderness for people that want that type of outing. I could go on and on about this controversy, but I hope you see my point. I hope you convince Judge Malloy to rule to keep snowmobiling in the BDNF.</i></p> <p>Response: Your support of snowmobiling as a recreational activity on the BDNF is noted. Alternatives analyzed in the DSEIS differ in the amount and location of areas remaining open to OSV use.</p>
11-1	<p><i>Please take into consideration that a lot of backcountry snowmobile riders enjoy the solitude of getting away from the big city rush, I ride in the twin lakes area 5-7 times a year...I've never seen any user conflict, never seen wildlife threatened, or any other signs that would put a negative spin on riding in these areas. My son is turning 13 this year and is also a avid rider that would be heart broken once again if this area closes...I was taught to appreciate where we reside and enjoy Montana for what it is. Snowmobiles leave no trace behind, most backcountry riding has not user conflict, and these areas have never be accustom [sic] to disturbing animals in general. Please help "us" the native Montana's [sic] to keep our lands open for everyone to use. Herding us up will only create user conflict and outlaws.</i></p> <p>Response: Your support of snowmobiling as a recreational activity on the BDNF is noted. Alternatives analyzed in the DSEIS differ in the amount and location of areas remaining open to OSV use. Because there are several "Twin Lakes" on the BDNF, we are unable to determine which geographic area the reviewer is referencing.</p>
12-1	<p><i>The areas we have rode are south of Jackson Montana South of Wisdom, North of Wisdom and god Creek Area. We have had little to no interaction with any game animals. I have not seen any damage to the areas that we ride. The good thing about snowmobiles is there is no impact. When the snow melts there is no trace that we were even there. Also in the areas that we ride the snow is typically to [sic] deep for any animals to stay there so they are all in the lower country. I think that all areas should be open to snowmobiling as the impact to the forest ground is almost zero. These are public lands and we should be able to use them. Most of these areas will never be used in the winter if snowmobiling is not allowed.</i></p> <p>Response: Your support of snowmobiling as a recreational activity on the BDNF</p>

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	is noted.
13-1	<p><i>I've found an error in the way that our [MFWP] data was used to determine whether or not a given hunting district was within population objective. We use our trend survey data with the elk population objectives (the objectives in our 2005 elk management plan, some of which have been updated). We don't use the elk estimates that are published on our website, which is what it appears was used throughout the DSEIS...In addition, FWP does have survey data for mule deer by hunting district (contrary to a statement in the DSEIS), just not for every hunting district³.</i></p> <p>Response: These errors have been corrected in the FSEIS through discussions with local MFWP biologists.</p>
14-1	<p><i>Please keep the Mt. Jefferson area open to snowmobilers. It is crucial to the economy of adjacent areas. Areas that are recommended for Wilderness consideration should not be treated as Wilderness. Snowmobilers have use [sic] the area for many years and yet, it continues to have sufficient Wilderness characteristics for you to recommend it for Wilderness consideration. There should be no closures unless there are clear damages being caused by snowmobile use in a particular area.</i></p> <p>Response: Alternative 1 and 4 propose keeping the entire area (BNDF) around Mt. Jefferson (in the Gravelly landscape) open to OSVs. Alternatives 2, 3 and 5 propose closing the Mt Jefferson area to OSVs. Alternative 6 Modified strikes a compromise as described in the 2009 ROD. Your support of continued OSV use in the Mt. Jefferson area is noted.</p> <p>The 2009 ROD allocated areas recommended for wilderness to winter non-motorized use.</p>
14-2	<p><i>The uncertainty of rules regarding access to Yellowstone National Park has caused economic hardship in the area. Do not add to that.</i></p> <p>Response: Changes to OSV use in Yellowstone National Park and potential impacts relative to the BDNF were analyzed in the social/economic section of the 2009 FEIS.</p>
14-3	<p><i>The Flathead National Forest conducted surveys that found that most cross country skiers do not travel more than a mile from a trailhead. It is the snowmobilers who pay for trail grooming and parking lot maintenance. Reducing their access will reduce access for everyone.</i></p> <p>Response: We contacted the Flathead National Forest and they are unaware of the referenced surveys concerning distance traveled by skiers. The SEIS (DSEIS, pg. 22) discloses “Since most skiers are limited to about 10 miles per day, much of the forest’s winter backcountry is also not visited by skiers. Cross-country skiing, for the most part, occurs within 10 miles of roads and parking areas. A</p>

³ Data for Hunting District 318 was attached to this comment and is available upon request.

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	few skiers take multiple day trips and winter camp.
15-1	<p><i>...we have selected Alternative 4 as the alternative we can support. This alternative provides for the most access to over snow recreation with minimal conflict with wildlife.</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
15-2	<p><i>Our membership has reported to me that more deer, antelope and elk are now found at lower elevations or near livestock. The current wolf situation has changed the migration of and habitat occupied by big game animals. Over snow activity normally is conducted after most big game has migrated to lower, mostly private property locations.</i></p> <p>Response: Thank you for your observations. Please see the response to comment 99-10.</p>
15-3	<p><i>Denning animals have seen limited to no over snow activity in areas in which dens are located.</i></p> <p>Response: It is unclear exactly which type of denning animals the commenter is referring to. The existing condition and effects to grizzly bear and wolverine denning habitat were analyzed in the DSEIS and updated in the FSEIS.</p>
15-4	<p><i>On page 32 of the Draft SEIS Montana Fish, Wildlife & Parks wardens have noted no tickets have been written or do they have any cases open for wildlife harassment. This alone goes to the character of the over snow community.</i></p> <p>Response: Your support of OSV use (or non-motorized winter) as a recreational activity on the BDNF is noted.</p>
16-1	<p><i>I have been snowmobiling off trail in the Big Hole, Pioneers and Mt. Jefferson areas since 1985. In all those years I have only once spotted a moose off the trail/road heading to the Swamp Cr. Area. I have observed wolf tracks in the Big Hole high areas. Depending on the year we also may see rabbit tracks. I have never seen a wolverine or goat track in the above areas. Due to the snow depth and lack of feed there is no big game wintering up high.</i></p> <p>Response: Thank you for your personal observations. Additionally, please refer to response to comment 1-2.</p>
16-2	<p><i>Snowmobiles operate on the snow so I have never observed any damage to soil or vegetation. This form of recreation leaves no trace of human activity once the snow melts. Summer use of trails and campsites leave do leave [sic] noticeable scars on the landscape.</i></p> <p>Response: Thank you for your personal observations. We disclosed similar observations in the DSEIS (pg. 92-93).</p>
16-3	<p><i>There is an ongoing dialogue about the back country should be a “quite [sic] area” to accommodate the “social values” of non motorized users. There are virtually no users other than snowmobilers in the high (alpine) areas in the winter period which makes the “social value/quite area” argument moot. I have, on three occasions in the past four or five years, come across back country</i></p>

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	<p><i>skiers who access an area via snowmobile. They double up on a snowmobile to get a skier to the top of a run and then one person rides the snowmobile back down to pick up the skier at the end of the run. There is no conflict of users in the high back country in the winter season.</i></p> <p>Response: Your observations are noted. Please also see comments 147-9 and 204-11 which also discussed use of snowmobiles for non-motorized recreation.</p>
16-4	<p><i>Winter motorized use should be treated/managed completely separate from summer motorized use.</i></p> <p>Response: The 2009 Forest Plan allocated areas to summer and motorized use. In some cases, these areas geographically overlap and in some cases they do not. This 2015 DSEIS supplements the analysis of winter motorized use in response to a Court Order.</p>
16-5	<p><i>I support Alternative (1) as noted in the DSEIS.</i></p> <p>Response: Your support of Alternative 1 is noted.</p>
16-6	<p><i>I would like to add that the DSEIS should not restrict comments to prior responders because over the course of six years people have moved out or moved into the State. Some of the newcomers, on either side of the motorized winter use argument, may be impacted by the DSEIS. The analysis in the DSEIS is also new information that was not available to the public in the original management plan.</i></p> <p>Response: Comments on the DSEIS are <u>not</u> limited to individuals and organizations previously providing comments on the 2005 Draft or 2008 Forest Plan FEIS.</p>
17-1	<p><i>My family has continually snowmobiled in the BDNF for at least 3 generations. I personally have done so for 35 years and during that time I cannot recall any conflict with wildlife, skiers, snowshoers, or bikers. We try to be good stewards and polite with the trail use. We have come across skiers and snowshoers [sic] but do our best to not interrupt there [sic] enjoyment of the outdoors. I carry a travel map on my phone and avoid any areas that we are not suppose to be in. Snowmobiling is an important part of our lives as we do not ski, snowboard, snowshoe or any of the other winter activities, we work during the week and snowmobiling provides the much needed breaks on the weekends.</i></p> <p>Response: Your support of continued snowmobiling use on the BDNF and responsible use of recreational opportunities is noted.</p>
18-1	<p><i>I am against shutting down the beaverhead/deerlodge national forest to motorized vehicles. My family has been hiking, hunting, camping, skiing, snowmobiling, dirt biking and quad riding since the 80's and my husband who was born here has played in these mountains his whole life. One of the least impactive hobbies we partake in is snowmobiling. First of all, most of the places we go have groomed paths which several snowmobile clubs we are members of, keep these trails open, maintained and groomed. When we do go off the</i></p>

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	<p><i>groomed trail, it is into areas that have accumulated enough snow that our snowmobiles would not be damaged (as well as the fact that vegetation would not be disturbed by our snowmobiles either). On the rare occasion that I have seen wildlife (usually moose) they don't even startle and continue feeding and we are respectful and never chase or harass wildlife. In the spring and summer we camp in a lot of these same areas that we snowmobile in and I have never come back and saw damage from snowmobiles on paths, open fields or even creek crossing that we have used. I find that any damage I did see is either from game or cattle.</i></p> <p>Response: Alternatives analyzed in the DSEIS do not propose closing the BDNF to motorized vehicles. However, they do propose differing amounts and locations for winter motorized use. Your support of continued snowmobiling use on the BDNF and personal observations about vegetation and wildlife are noted.</p>
18-2	<p><i>Our small towns stay afloat with the tourists that come to our area. They come to hunt, fish, hike, camp, snowmobile, motorcycle, ride quads and dirt bikes. They also ski and cycle. I have many friends that ride their snowmobiles up to the local ski hill, ski all day then ride their snowmobiles down to the local restaurant for dinner...as a business owner that is in a business that has a percentage of its business coming from tourism travel of this kind, I can tell you that cutting a huge portion of what attracts them to our area out of the equation will put a lot of us out of business. Small towns like Wisdom, Jackson, Wise River, Dewey and Melrose count of [sic] Snowmobilers to come in and eat at their restaurant's [sic], stay in their hotels, drink in the bars, buy gas at their gas stations and shop in their small specialty stores.</i></p> <p>Response: Your observations are noted. Please also see response to comment 26-3 concerning the economic role of snowmobiling.</p>
18-3	<p><i>I have older friends that cant [sic] hike or cross country ski anymore. They don't want to spend months on end sitting in their homes but they can sit on a snowmobile and get out into nature.</i></p> <p>Response: You support of continued snowmobiling opportunities on the BDNF is noted.</p>
19-1	<p><i>These comments refer in general to all public land under review, but specifically to the East and West Pioneer Mountains. I have used this area for over 40 years and truly care about long term effects of use on the land. With regard to snowmobile use I have watched for winter impact during the summer and seldom if ever, see damage. I also have concern for wildlife in winter months because of the added stress put on them. Look at where the animals are located this season of 2016. It is more and more common to see animals winter closer to man. Why, because they adapt just like a human being does. Snowmobile/animal conflict occurs rarely in this area. Specific areas that have been closed for years are common sense (Fleecer and south of Divide). Closing</i></p>

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	<p><i>more areas for this reason would just not be effective. Animals use lower elevation to winter while snowmobiling occurs at higher elevation. An example is the Pioneer Mtn. Byway.</i></p> <p>Response: Your observations about the effects of snowmobile use are noted. Areas closed to OSV use prior to the 2009 Forest plan decision remained closed to OSV use.</p>
19-2	<p><i>Public land should be managed for multiple use and not specific uses. I support use Alternative 1. It is the job of the Forest Service to represent all public land users and not just the ones with the strongest lobby.</i></p> <p>Response: Your support of Alternative 1 is noted.</p>
20-1	<p><i>During the last 21 years I have owned 5 snowmobiles that have a total of 18,468 miles on them which I estimate 90% was miles in the West Pioneers. During that 21 years I <u>never</u> encountered a cross country skier or their tracks in the bac country or a snowshoer, fat tire biker, dog musher or hiker.⁴</i></p> <p>Response: You observations concerning non-motorized winter recreation use in the West Pioneers is noted.</p>
20-2	<p><i>After the close of hunting season and the subsequent snowfall you do not see elk or deer in the afore mentioned areas as the snow is to [sic] deep. You may see (very rarely) a moose in the willows in the lower portion of Lacy Creek. But not where sleds ride. Most winter if not all habitat areas are closed to snowmobiling along or near the Big Hole River from just west of the Dickie Bridge to Jackson.</i></p> <p>Response: Thank you for your personal observations. Additionally, please refer to response to comment 1-2.</p>
20-3	<p><i>I observed no damage to the environment during these 21 yrs of snowmobiling. I have <u>enclosed a handbook from the Montana State Parks</u> which on page 8 states snowmobiles have a minimal impact when operated properly on the environment when at least 4” of snow is present. Also note there [sic] statement on the positive effect of snow compaction.</i></p> <p>Response: Thank you for your personal observations. The enclosed handbook provides valuable safety and information about ethical snowmobile use specific to Montana. This public information brochure recommends snowmobiling on at least 4 inches of snow.</p>
20-4	<p><i>Closing the West Pioneers would greatly impact me negatively to snowmobiling as that is my chief form of winter recreation.</i></p> <p>Response: None of the alternatives analyzed in the DSEIS propose closing the geographic area the reviewer identifies in the West Pioneers to OSVs.</p>
20-5	<p><i>I also love to ice fish high mountain lakes and the prior closure of the Torrey</i></p>

⁴ Mr. Johnson identifies a large number of geographic locations in the Pioneer landscape where he snowmobiles. The full content of this letter is available upon request.

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	<p><i>Mountain Wilderness Study Area involving a reported 76,000 acres removed some of the best ice fishing lakes including Torrey, Abundance, Tahepia, Rainbow, Crescent and Upper Lower Schulz Lakes. This now forces those who want to ice fish high mountain lakes to go to some Stone, Sand, Ferguson, Foolhen, & Johanna Lakes. Bally Lake fish are ugly with large heads and small bodies.</i></p> <p>Response: As stated by the reviewer, Torrey, Abundance, Tahepia, Rainbow, Crescent and Upper and Lower Schulz Lakes are closed to OSVs in the Forest Plan, in part, due to their location in the Torrey Mountain Recommended Wilderness (Pioneer Landscape). We are unaware of a lake on the BDNF named Bally Lake and believe this was a typographical error. Baldy Lake is located in the same general vicinity as Stone, Sand, Ferguson, Foolhen and Johanna Lakes, all of which are located in the West Pioneer Mountains (Pioneer Landscape) and remain open to OSV use in all alternatives. Stone, Sand, Baldy and Johanna Lakes are located within the West Pioneer WSA.</p>
20-6	<p><i>Snowmobiling is also good for the small business in Wise River, Wisdom, Dewey, Jackson & Grasshopper.</i></p> <p>Response: Your views are noted.</p>
21-1	<p><i>My family and I have snowmobiled in the West Pioneers for 30+ years. I have never seen any elk or their tracks. When the snow gets 4 ft or deeper they leave for sunny slopes or ranchers hay meadows.</i></p> <p>Response: Thank you for your personal observations.</p>
21-2	<p><i>I have met skiers, snowshoers & mushers on the byway. Move over and let them go by. With mushers pull over and shut your motors off so you don't excite the dogs. There is plenty of room for all winter activities everywhere up there!</i></p> <p>Response: Your views and observations are noted and are appreciated in minimizing conflict while providing multiple-use opportunities.</p>
21-2	<p><i>We have never seen any damage to any resources.</i></p> <p>Response: Your personal observations of snowmobile use/effects in the West Pioneers are noted.</p>
22-1	<p><i>Outdoor recreation, specifically snowmobiling, has been a very large portion of our winter family time. My wife and four children, and myself use the public land in Beaverhead-Deerlodge NF in a family style time to enjoy our company as well as the beautiful winter outdoors.</i></p> <p>Response: Your enjoyment of family time spent snowmobiling on the BDNF is noted.</p>
22-2	<p><i>We have never encountered elk, deer or hardly any other animals while snowmobiling. History proves these animals migrate to lower elevations in the winter, mostly on private lands. We occasionally pass cross country skiers, snowshoers, and mushers. All have smiled and waved to us as we pass them in</i></p>

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	<p><i>a respectful manner. All or most vegetation is covered by snow, so cross country travel has no impact. Come spring melt, all trace of snowmobilers disappears with the snow.</i></p> <p>Response: Your personal observations of snowmobile use/effects on the BDNF are noted. Additionally, please see the response to comment 99-10.</p>
23-1	<p><i>We are <u>opposed to the further additions</u> or changes to the 2009 Beaverhead-Deerlodge Forest Winter Travel Plan. We base this opposition from first hand observations in the Big Hole Valley.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
23-2	<p><i>First, the <u>current condition is restrictive and mixed use is working</u>. The 2009 plan already greatly reduced winter motorize travel on the Beaverhead-Deerlodge National Forest. Cross Country skiers are never seen in the back country of the Big Hole Valley where snowmobiles travel.</i></p> <p>Response: Your views are noted.</p>
23-3	<p><i>Second, <u>there is sufficient wilderness</u>, road less and non-motorized use within and adjacent to the Beaverhead-Deerlodge National Forest. The second and third largest wildernesses in the lower 48 are in close proximity; namely, the Frank Church (2,366,757 acres), the Bitterroot Selway (1,340,460 acres) along with the adjacent Anaconda Pintler Wilderness (1,009,356 acres), Glacier National Park (1,013,572) and Yellowstone National Park (2,219,789 acres). <u>8,100,000 acres is more than ample area</u> to protect, study and enjoy local ecosystems.</i></p> <p>Response: Your views are noted.</p>
23-4	<p><i>Third, the elk, deer and moose population do not interface with snowmobiling in the Big Hole Valley. Elk on the west side of the Big Hole Valley migrate to Idaho for the winter. The remainder of the elk and deer and most of the moose population move off the forest in the winter to private and State land. The few moose that remain in the forest benefit from snowmobile track to move about in deep snow to feed.</i></p> <p>Response: Please see responses to comments 99-10 and 100-24 and the updated big game section in the FSEIS.</p>
23-5	<p><i>Finally any additions to road less areas Forest Plan deny access to the peoples forest. Motorized transportation is the horse of the 21st century and is the preferred mode of travel of most American. Those with disabilities and the aging of the general of the population make it imperative that we <u>keep the forest accessible to all who wish to enjoy it</u>.</i></p> <p>Response: Your views are noted. Please also see response to comment 39-3.</p>
24-1	<p><i>...quiet backcountry is becoming a lot more scarce these days as snowmobile and OHV technology allows motorized users to go further into our wildlands than ever before. I’m urging the Forest Service to show restraint and recognize that there’s a huge portion of Montanans who value the places where we can’t</i></p>

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	<p><i>hear motors.</i> Response: Please see response to comment 99-3 concerning consideration of OSV technology advances.</p>
24-2	<p><i>...the current Forest Service plan leaves more than 60% of winter range open to snowmobiles and other motorized winter recreation. Currently, 91% of the Big Hole winter range, 83% of the Clark Fork Flint winter range, and 77% of the Pioneer Winter Range are open to snowmobile use. That’s far from being a balanced plan, and it’s one that can’t be healthy for the iconic elk herds that use this range.</i> Response: Please see the response to comment 99-16.</p>
<p>Varies⁵-1 (24-25, 27, 29-32, 35-38, 43, 45, 53, 54, 56-62, 64-67, 69, 71-84, 86, 88, 92-95, 98, 101, 103-125, 155-174, 176-177)</p>	<p><i>Protect Mount Jefferson and the ultimate headwaters of the Missouri River by keeping the upper Hellroaring Creek drainage to the Continental Divide motor-free.</i> Response: Alternatives 2, 3 and 5 consider closing the BDNF portion of the Mount Jefferson area to OSVs.</p>
<p>Varies-2 (24-25, 27, 29-32, 35-38, 43, 45, 53-54, 56-62, 64-67, 69, 71- 84, 86, 88, 92-95, 98, 101, 103-125, 155-174, 176-177)</p>	<p><i>Eliminate snowmobiling in Sullivan Creek and around Barker Lake on the shoulders of the Anaconda-Pintler.</i> Response: The areas mentioned are open to OSVs in all alternatives. The comments state that only these areas should be closed, without supporting reasons. We do not have evidence of adverse effects related to OSV use in these areas. Please see analysis in the FEIS related to the Big Hole Landscape and Clark-Fork Flint Landscape. A recommendation to eliminate snowmobiling in Sullivan Creek and around Barker Lake will be considered in the SEIS.</p>
<p>Varies-3 (24-25, 27, 29-32, 35-38, 43, 45, 53-54, 56-62, 64-67, 69, 71-84, 86,</p>	<p><i>Open areas to snowmobiling where the activity now commonly occurs and close areas that receive little or no use.</i> Response: The SEIS analyzed potential impacts of OSV use on big game winter range and resources cited in the minimization criteria. A recommendation to open areas where the use commonly occurs and close areas that receive little or no use will be considered in the SEIS.</p>

⁵ We received numerous letters with nearly identical comments. Rather than separately provide the same response to the same comment, the letters and comments are consolidated here as Letter & Comments Varies 1 through 5. The letter number in parentheses identifies the letter and author.

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88, 92-95, 98, 171-173, 175, 177)	
<p>Varies–4 (24-25, 27, 29-32, 35-38, 43, 45, 53-54, 56-62, 64-67, 69, 71-84, 86, 88, 92-95, 98, 101, 103, 125, 155-174, 176-177)</p>	<p><i>Significantly decrease snowmobile use in big game winter ranges, including the Big Hole, Clark Fork Flint, and Pioneer winter ranges.</i> Response: The effects analysis for big game winter range has been updated in the FSEIS to include comments and personal discussions with MFWP biologists across the Forest. MFWP biologists responsible for the Big Hole, Clark Fork Flint and Pioneer Landscapes stated that the Forest Service greatly overestimated the use by snowmobiles in these Landscapes. Although effects to wildlife individuals are possible in these Landscapes, MFWP biologists have not identified snowmobiles as a threat by to any big game populations in these areas. Additionally please refer to comment 99-16.</p>
<p>Varies–5 (24-25, 27, 29-32, 35-38, 43, 45, 53, 54, 56-62, 64-67, 69, 71-84, 86, 88, 89, 92-95, 98, 101, 103-125, 154- 177</p>	<p><i>Keep the high basins of the West Pioneers – including Bobcat Lakes, Lost Horn Mountain, and Grouse Lakes – quiet for future generations of outdoor enthusiasts.</i> Response: Thank you for your recommendation and will consider it in the FSEIS. We are unaware of the location of Lost Horn Mountain in the West Pioneers and assume this is a typographical error referring to Lost Horse Mountain located between Bobcat Lake and Grouse Lakes.</p>
25-1	<p><i>It is important to be thoughtful of management in the Mount Jefferson area. Six years of monitoring shows that snowmobile use has not respected the boundary set by the forest service. A boundary adjustment to the CDT for snowmobile use coupled with enforcement is the sensible solution. Please help enforce a sustainable strategy for protecting Mount Jefferson.</i> Response: Your concern over the effectiveness of the recommended wilderness boundary of the Mt. Jefferson area is noted. The 2009 Record of Decision for the Beaverhead-Deerlodge National Forest Plan recommended the north portion of the Mt. Jefferson/Hellroaring Creek area in the Centennial Mountains as wilderness and left the south portion open to snowmobiling. The decision provides access for snowmobilers on the Idaho side of Mt. Jefferson while providing greater protection for wolverine habitat and other wilderness values in Hellroaring Creek. The boundary line between winter snowmobiling in Mt Jefferson Management Area and the snowmobiling closure for Centennial Recommended Wilderness Management area is drawn along the 2001 wolverine habitat closure. The Record of Decision states on page 21, “the combination of uses allowed on Mt Jefferson under the Forest Plan represents a management challenge, because the boundary between the motorized and non-motorized use areas does not follow an effective topographical barrier to</p>

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	<p>illegal motorized entry. The success of this compromise decision relies heavily on voluntary compliance with recommended wilderness boundaries by over-snow vehicle users. The Forest Monitoring Plan specifically spells out monitoring requirements that address compliance with restrictions on motorized use in Mt. Jefferson. If monitoring reveals that non-compliance is an issue, the decision to allow snowmobiling on Mt. Jefferson will be re-evaluated.”</p> <p>Monitoring of the Mt. Jefferson area is ongoing. During snow seasons from 2009-2015, Forest Service and BLM personnel conducted 45 days of on-the-ground monitoring in the Mount Jefferson area. Evidence of motorized incursions into the recommended wilderness was observed about 60% of the time, but there is a general downward trend in motorized incursion evidence through physical monitoring data based on annual percentage of days where motorized incursions are noted. It is believed at this time that the presence of patrollers is having an effect in reducing the number of incursions.</p> <p>A letter was sent to over 750 Forest Plan participants January 15, 2013 describing results from monitoring in 2010, 2011, and 2012. The letter describes intrusions into the closed area. Despite clear boundary marking, intrusions are occurring, as evidenced by tracks and observations. The letter concluded by stating, “We intend to continue with monitoring the area this year. Based on results of the monitoring, I will re-evaluate the decision to allow snowmobiling on Mt. Jefferson in 2014.”</p> <p>It was decided to continue monitoring in 2014. This decision was based on monitoring results, consideration of new public education efforts, and increased enforcement efforts. In an effort to be more effective in reducing intrusions into the recommended wilderness area, Madison Ranger District, Ashton-Island Park Ranger District, Fremont County Idaho, Idaho and Montana State Snowmobile Associations, and snowmobile volunteers of Fremont County began working on a plan last winter (2014/2015) to get snow rangers in place for the winter of 2015/2016 to patrol the Mt. Jefferson motorized – non-motorized boundary through the season. Funding has been secured to hire snow rangers for the next two seasons, a local Arctic Cat dealer will be providing the use of two snowmobiles, and housing for rangers is available at the Ashton-Island Park Ranger District. It is hoped that with this partnership and the added aspect of a consistent education and enforcement presence, compliance will substantially improve.</p>
26-1	<p><i>I would like to comment in support of continued snowmobiling in the BDNF. I have snowmobiled in the area west of Wisdom & Jackson, the Pioneers and the area north and west of Wise River. These areas offer exceptional opportunities to enjoy the national forest while not leaving any sign of your presence after the snow melts.</i></p> <p>Response: Your support of continued OSV use on the BDNF is noted. The 2009</p>

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	Beaverhead-Deerlodge National Forest Plan allocated acres to winter non-motorized and motorized settings with a balance of settings and opportunities provided. Table 27 in the DSEIS shows a Summary of Winter Recreation Allocations by Alternative.
26-2	<p><i>Because of the high elevation of this area I have never seen any kind of wildlife this time of year.</i></p> <p>Response: Your personal observations of wildlife use in the area during the winter is noted.</p>
26-3	<p><i>Snowmobiling also provides an economic stimulus to the small towns in the Big Hole-Wise River area.</i></p> <p>Response: The effects to social and economic factors were analyzed in the 2009 FEIS (page 219) and SEIS (pages 30, 167). Research cited illustrates that snowmobiling is a significant sport in the state of Montana, with significant economic impacts. Spending is highest when it involves longer travel distance and overnight stays, and purchases of gasoline and oil. According to one study, resident and nonresident snowmobilers buy about 4.3 million gallons of gasoline per season. With a tax base of \$0.27 per gallon, snowmobilers in Montana generate over \$1.2 million in revenue for the state highway trust fund.</p>
26-4	<p><i>I have never seen any other wintertime users so no user conflict exists.</i></p> <p>Response: Your personal observations of other recreating users is noted.</p>
28-1	<p><i>Please keep snowmobile access in the B-D. Winter motorized use has a very positive benefit to the economies of small local communities.</i></p> <p>Response: Alternatives analyzed in the SEIS continue snowmobiling use in the BDNF.</p>
28-2	<p><i>Snowmobile use has NO impact to the land or wildlife.</i></p> <p>Response: Please see responses to comments 153-4 and 153-5.</p>
30-1	<p><i>Don't appreciate motorized vehicles in backcountry. Motorcycles have damages Hyalite Basin near Bozeman. We already have plenty of roads. One motorcycle destroys wilderness solitude for miles. Also, snowmobiles often cross illegally into wilderness. They stress the wildlife in winter. So no, no motorized vehicles in wilderness.</i></p> <p>Response: Alternatives analyzed in the DSEIS do not consider motorized vehicle use in designated wilderness areas. The Hyalite Basin area is located on the Gallatin National Forest; not the BDNF.</p>
32-1	<p><i>Close the Cowboy Heaven (recommended wilderness) to snowmobiling. These meadows provide connectivity between two sections of the Lee Metcalf Wilderness.</i></p> <p>Response: The Cowboy Heaven area was closed to snowmobiles prior to the 2009 Forest Plan and, as a result, remains closed under all alternatives analyzed in the DSEIS.</p>

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32a-1	<p><i>The OSV rule requires that designated routes and areas are located so as to minimize damage to natural resources, conflicts with other uses, and impacts to wildlife and wildlife habitat. There are many areas that are designated as “high value” winter range open to snowmobiles and other motorized winter recreation. Currently, 91% of the Big Hole winter range, 83% of the north side of the Flint winter range, and 77% of the Pioneer Winter Range are open to snowmobile use.</i></p> <p>Response: Please see the response to comment 99-16.</p>
32a-2	<p><i>There are extensive landscapes that see “none to seldom” snowmobile usage. Rather than default to leaving those open, why not close them? As I understand it, the new OSV rule prohibits the USFS from defaulting to open. Plus, having fewer/smaller areas open to OSV use would allow the FS to better utilize its limited resources and would be a significant improvement in wildlife management.</i></p> <p>Response: 36 CFR 219.21 in the Forest Planning regulations (1982) states that a broad spectrum of outdoor recreation opportunities shall be provided for in each Forest Plan alternative. Forest plans are required to identify (2) the recreational preferences of user groups and the settings needed to provide quality recreation opportunities; and (3) recreation opportunities on the National Forest System lands. 36 CFR 295.2 (a) states that the planning process will analyze and evaluate current and potential impacts arising from the operation of specific vehicle types on soil, water, vegetation, fish and wildlife, forest visitors and cultural and historic resources. If the analysis indicates that the use of one or more vehicle types off roads will cause considerable adverse effects on the resources or other forest visitors, use of the affected areas and trails by the vehicle type or types likely to cause such adverse effects will be restricted or prohibited until such time as adverse effects can be eliminated as provided in 36 CFR part 261. No National Forest policy directs national forests to restrict or prohibit use where no analysis has indicated that the use would cause considerable effects.</p>
32a-3	<p><i>Recommended Wilderness areas, Wilderness Study Areas and proposed wilderness areas should be closed to preserve their wilderness character, specifically the quiet and solitude. The use allowed on Mt Jefferson is degrading the quality of an adjacent Recommended Wilderness area. I believe the logical approach should be to close Mt. Jefferson area to snowmobiling at the Continental Divide, which becomes an identifiable, logical, landscape-based boundary, rather than having an arbitrary boundary in the middle of meadows. The Forest Service and Winter Wildlands have documented evidence of consistent intrusions over the current boundary.</i></p> <p>Response: Please see the response to comment 25-1.</p>
32a-4	<p><i>Given that the percent of cross-country skiers has increased 305% (from 4% to 12.2%) and the number of snowmobilers has decreased 43% (from 3% to 1.7%)</i></p>

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	<p><i>in the intervening years, I think more OSV closures are called for. I encourage you to guarantee non-motorized users more opportunities for quiet recreation through this forest plan.</i></p> <p>Response: It is unclear what data the reviewer is relying on to make the assertion and no citation is provided, additionally the logic presented in this comment is questionable. If in fact the Forest Service should base allowable uses on the quantity of people participating in that type of use, then would the reviewer support expanding motorized use if motorized use levels go up? Please see the section of the FSEIS that discusses non-motorized use patterns on the Forest; in summary the use levels of non-motorized users (cross-country/backcountry skiers, snowshoers) is scant on most landscapes due to a lack of convenient access without the use of a snowmobile. Plowed trailheads are limited to say the least, therefore non-motorized backcountry uses are consequently extremely limited due to the many miles needed to reach deep snow areas; this often requires multi-day trips or very long approaches to reach these areas where snowmobiles frequent. As such, the logic outlined in this comment would lead the Forest Service to authorize significant increases in motorized use because the actual number of snowmobilers outpaces the actual number of non-motorized users.</p>
32a-5	<p><i>In the interest of allowing for genetic diversity amongst far-reaching species like wolverines and grizzly bears, we need to think in terms of prohibiting motorized use in the corridors that link these ranges.</i></p> <p>Response: Please see the response to comment 99-10. The SEIS has been updated with information about corridors for wolverines and grizzly bears.</p>
33-1	<p><i>Please consider more protection for nonmotorized users of the Mt. Jefferson area in you winter use policies. I am dismayed at the inability to find quiet, safe recreation in the area as it is currently (and historically) managed.</i></p> <p>Response: Closure of the entire area (BDNF portion) around Mt. Jefferson is considered in Alternatives 2, 3 and 5.</p>
34-1	<p><i>Make more OHV, snowmobile areas available around Mount Jefferson.</i></p> <p>Response: Alternatives 1 and 4 propose allocating the entire area (BDNF portion) around Mount Jefferson open to winter motorized use.</p>
34-2	<p><i>Please Expand snowmobiling in Sullivan Creek and around Barker Lake on the shoulders of the Anaconda-Pintler.</i></p> <p>Response: All alternatives considered in the SEIS continue authorizing OSV use in Sullivan and Barker Creek (including Barker Lake).</p>
34-3	<p><i>Snowmobiling is a huge economic impact on the local economies. Ask any local business which group they would rather see, snowmobile crowd or a sparse few (quit [sic]) users. Over whelming the answer will be the snowmobile crowd. The non motorized crowd already have millions of acres in the numerous wilderness areas. Snowmobile industry is growing in leaps and bounds over the non</i></p>

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
	<p><i>motorized winter crowds.</i> Response: Please see the response to comment 26-3.</p>
39-1	<p><i>An area recommended as suitable for wilderness must meet the tests of capability, availability, and need.</i> <i>There is no “need” for additional RWAs, and there is especially no need for them to be treated as de-facto wilderness. It should be noted that most RWAs, until recent decisions have impacted areas were allowing snowmobile use. If existing snowmobile use did not preclude the Forest Service from recommending these areas for future wilderness designation, then the management criteria resulting from that conclusion should allow snowmobile use to continue unless Congress in the future decides to officially designate these areas as designated wilderness. Only Congress has the authority to do so.</i> Response: The DSEIS does not analyze changes to areas recommended for wilderness in the Forest Plan (RWAs).</p>
39-2	<p><i>Snowmobiling has been negatively impacted with recent decisions regarding snowmobile travel being restricted from federal wilderness area and recommended wilderness areas. These management policies negatively impact recreation, economic prosperity and opportunity to enjoy these public lands.</i> Response: Your views are noted.</p>
39-3	<p><i>I am affected with physical disabilities that prevent me from enjoying much of the snow covered terrain during winter months without use of a snowmobile. I have no other way of accessing the available public lands in a reasonable fashion. ATV's cannot negotiate these areas in winter and use of snowshoes and skis aren't a feasible option because of my physical limitations. Areas previously allowed to be accessed are now restricted due to wilderness and recommended wilderness restrictions, wildlife management restrictions also are in effect in a considerable amount of area that in years past have been accessible. We respect that but to close even more area is irresponsible. Enjoying winter activities with family and friends is a way of life.</i> Response: Each alternative in the FEIS (2009) retained snowmobiling recreation opportunities in various locations on the Beaverhead-Deerlodge National Forest. Motorized recreation opportunities were provided under each alternative, and include both groomed and backcountry settings. The amount of acreage open to snowmobiling varied by alternative, as displayed on Table 27 of the SEIS. Due to resource concerns; policy, law, and regulation; conflict of use; and safety, not all uses can be accommodated everywhere on the landscape. This means that motorized uses must be restricted in some areas, while motorized uses are allowed in others. 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 NFS lands that are open to foot travel, even if</p>

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	they are battery powered. However, there is no legal requirement to allow people with disabilities to use 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 15e 103).
39-4	<p><i>I snowmobile within the currently designated snowmobiling corridors west of Anaconda-Red Lion, Storm Lake, East Fork, Frog Pond, and surrounding areas of the West Big Hole, Mount Evans and Miller Lakes area, Mount Haggin Wildlife Management area, the Fleecer Range area, and the West Pioneers. Traveling outside of this area to go snowmobiling is not realistic for me as it would become an extravagance that I could not responsibly afford. Eliminating snowmobile opportunities in the area I am able to spend time with family and friends will negatively impact my physical and mental health, my lifestyle and well-being.</i></p> <p>Response: The areas described allow for snowmobiling and offer groomed and ungroomed snowmobiling experiences. Thank you for your enjoyment and respectful use of the trails and areas authorized as open for snowmobiling.</p>
39-5	<p><i>Snowmobiles don't impact soils or vegetation when operated as designed and within existing travel restrictions. I respect the restrictions for snowmobiling in designated areas in the absence of adequate snow cover. Impacts to soil and vegetation by snowmobile travel would not change. Snowmobiles don't impact watersheds when operated as designed and within existing travel restrictions.</i></p> <p>Response: Your personal observations of snowmobile impacts on soils, vegetation and watersheds are noted.</p>
39-6	<p><i>Montana FWP does an outstanding job managing areas they oversee for Winter wildlife range. Snowmobiles don't cause wildlife disruption if operated as designed and outside the Montana FWP designated over-wintering areas and seasons. Additionally, the federal and/or state designated snowmobile season is typically restricted to between December 2 to May 15, and it is against state and federal law to harass wildlife of any kind using a snowmobile.</i></p> <p>Response: Your personal observations of snowmobile impacts on wildlife on the BDNF are noted. Please see the response to comment 4-5.</p>
40-1	<p><i>...I want to show support for what’s already in place. The decision has been accepted by the public and feel what is in place currently address’s [sic] proper management.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
41-1	<p><i>My family and I have been Snowmobiling most all areas of the Beaver Head Deer Lodge National Forest for over 45 years. It does not look any different now than it did in 1971. I have seen way more wild life in the summer months now than in the past – moose, elk, deer and mountain lions. We have always been very courteous to wild life and other winter recreational users. I never once remember an issue with animals, people, or other snowmobile riders.</i></p>

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	Response: Your personal observations of snowmobile impacts to wildlife, and other users are noted.
41-2	<i>Also the economic impact snowmobiling has on the area is huge – from Ennis Montana to Anaconda Montana. Just drive by any convenience store, restaurant, or gas station on a weekend morning – you will see many snowmobile riders purchasing fuel, food, and supplies.</i> Response: Please see the response to comment 26-3.
Varies-6⁶ (42, 46, 49, 51-52)	<i>Keep Mount Jefferson and the ultimate headwaters of the Missouri River open by keeping the upper Hellroaring Creek drainage to the Continental Divide open and accessible to motorized vehicles.</i> Response: Alternatives 1 and 4 consider continuing OSV use on the BDNF in the Mount Jefferson Area. Alternative 6 Modified attempts to strike a balance by continuing OSV use on the south portion and prohibiting OSV use on the north portion.
Varies-7 (42, 46, 49, 51, 52, 87)	<i>Do not eliminate snowmobiling in Sullivan Creek and around Barker Lake on the shoulders of the Anaconda-Pintler.</i> Response: All alternatives considered in the SEIS continue authorizing OSV use in Sullivan and Barker Creek (including Barker Lake).
Varies-8 (42, 46, 49, 51, 52, 87)	<i>DO NOT decrease snowmobile use in big game winter ranges, including the Big Hole and the north side of the Flint Range.</i> Response: Please see the response to comment 153-4.
Varies-9 (49, 51, 52)	<i>Keep the high basins of the West Pioneers – including Bobcat Lakes, Lost Horn Mountain, and Grouse Lakes – open to over snow vehicles for future generations of outdoor enthusiasts.</i> Response: We are unaware of the location of Lost Horn Mountain in the West Pioneers and assume this is a typographical error referring to Lost Horse Mountain located between Bobcat Lake and Grouse Lakes. Alternatives 1-6 modified analyzed in the DSEIS consider leaving this area open to winter motorized use.
Varies-10 (46, 49, 51, 52)	<i>Leave open areas to snowmobiling where the activity now commonly occurs and leave all areas open for the people to choose how they recreate on it.</i> Response: Each alternative in the FEIS retained snowmobiling recreation opportunities in various locations on the Beaverhead-Deerlodge National Forest. Public input and local agency knowledge was incorporated in determining for winter non-motorized and motorized allocations.
44-1	<i>My family came into this area in 1884 and have been enjoying the great outdoors responsibly for years and would like to continue this into the future.</i>

⁶ We received a second grouping of letters with nearly identical comments (see footnote 5). Rather than separately provide the same response to the same comment, the letters and comments are consolidated here as Letter & Comments Varies 6 through 9. The letter number in parentheses identifies the letter and author.

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
	<p><i>We have spent many hours, backpacking, cycling, telemark skiing, fishing, hunting and riding snowmobiles in these areas. Closing down these areas to snowmobiles will exclude one group of users and give exclusivity to another. We all live in the same world and we need to be mature enough to share it. Please keep our land open to all users.</i></p> <p>Response: Your support of shared recreation use is noted.</p>
47-1	<p><i>There is no need to close snowmobile area, there is no damage to environment, creatures, because of snowmobile use.</i></p> <p>Response: Your support of continued snowmobile use and personal observations are noted.</p>
48-1	<p><i>In the deep of winter when mountains are blanketed in 10 feet of snow. No one and no animals are to be found. All the big game have migrated to the low valleys to find food...No animals live at high elevations in the winter so no wildlife is disturbed.</i></p> <p>Response: Thank you for your personal observations. Please see responses to comments 153-4 and 153-5 related to other species.</p>
48-2	<p><i>Snowmobiles do no damage to mountain wilderness. Riding around with 10 feet of snow between the snowmobiles means nothing is harmed. I hike and backpack all summer in these amazing places. The same areas I snowmobile and there is absolutely zero trace. Further there are zero studies that show snowmobiles have an effect on water quality.</i></p> <p>Response: Motorized use, including snowmobile use, is legislatively prohibited in designated wilderness areas on the BDNF. Your personal observations about the effect of snowmobiles are noted.</p>
50-1	<p><i>I am for allowing snowmobiling to continue in all areas it is currently allowed. It does not cause any damage or affect snow bound areas in any way when snowmobiling and also can benefit game animals as they use the tracks to move from area to area.</i></p> <p>Response: Your support of Alternative 6 Modified is noted. Richens and Lavigne (1978) did find that deer can benefit from snowmobile trails. Please see the updated FSEIS throughout the document. Additionally, please see responses to comments 153-4 and 153-5.</p>
52-1	<p><i>These high mountain areas are never the wintering areas for big game. If a big game is up there it is because they are stuck there and the snowmobile tracks may be the necessary path they need to get down to lower elevations with less harsh conditions and better their survival chances.</i></p> <p>Response: Thank you for your personal observations. Please see responses to comments 153-4 and 153-5 related to other species.</p>
52-2	<p><i>Snowmobiling in this area is key to the economic survival of the surrounding town businesses. New sled technologies has significantly reduced the carbon footprint and environmental disturbance that sleds are causing. Therefore,</i></p>

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	<p><i>there is no reason that all people that pay to use the lands shouldn't be able to enjoy them equally.</i></p> <p>Response: Thank you for your views.</p>
55-1	<p><i>I have never had a conflict with skiers, fat tire bikers, mushers, or snowshoer's during that time. In fact, I have never seen any of these recreationalists while snowmobiling on the BDNF North of Mt. Jefferson. I have never seen any sign of these recreationalists in this area.</i></p> <p>Response: Your personal observations are noted.</p>
55-2	<p><i>Snowmobiling makes fat tire biking possible. If it were not for snowmobile trails, they simply could not ride. In Island Park we embrace fat tire bikers. We coordinate their races with our grooming schedule to assure they have a positive experience. And we notify the public regarding which trails they will be using and when. There not only is no conflict, there is great cooperation.</i></p> <p>Response: Your views are noted regarding the cooperation and lack of conflict between non-motorized fat tire bicycling and snowmobiling.</p>
55-3	<p><i>If snowmobiling was discontinued on the North side of Mt. Jefferson, you would put the Elk Lake Lodge out of business. You would ruin the owner's lives and their property would have little value. In my experience, non-motorized recreationalists do not spend any money in the area. They bring their own food and not spend money at the local businesses... Consider that well over 90% of the recreation in the area is motorized.</i></p> <p>Response: Elk Lake Lodge is located on the west shore of Elk Lake and, during the winter, accessed via OSVs driving the unplowed county road over Red Rock Pass (Idaho road 53, Montana road 509) from the Henry's Lake area in Idaho and then into the Centennial Valley in Montana. Snowmobile use on the BDNF portion of Mt Jefferson occurs in the upper reaches of Hellroaring Creek. Rugged terrain in the lower reaches of Hellroaring Creek physically restricts snowmobile use down Hellroaring Creek and into the Centennial Valley. As a result, winter use of the Elk Lake Lodge is not influenced by OSV use on the BDNF portion of Mt. Jefferson.</p>
63-1	<p><i>Our position is that the existing system of snowmobile routes does not adequately meet the needs listed here:</i></p> <p><i>Enjoyment and Rewards of Motorized Recreation</i></p> <ul style="list-style-type: none"> • <i>Opportunity for a recreational experience for all types of people</i> • <i>Opportunity to strengthen family relationships</i> • <i>Opportunity to experience and respect the natural environment</i> • <i>Opportunity to participate in a healthy and enjoyable sport</i> • <i>Opportunity to experience a variety of opportunities and challenges</i> • <i>Camaraderie and exchange of experiences...</i> <p>Response: Your views are noted.</p>
63-2	<p><i>Our position is that the existing system of snowmobile routes does not</i></p>

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
	<p><i>adequately meet the needs listed here:</i></p> <p><i>Acknowledged Responsibilities of Motorized Visitors</i></p> <ul style="list-style-type: none"> • <i>Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.</i> • <i>Responsibility to respect all visitors</i> • <i>Responsibility to use vehicles in a proper manner and in designated places</i> • <i>Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.</i> • <i>Responsibility to educate the public on the responsible use of motorized vehicles on public lands.</i> <p>Response: Your views are noted.</p>
63-3	<p><i>We feel that we are representative of the needs of the majority of visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks etc. Mountain bikers seem to prefer our trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation.</i></p> <p>Response: Your views are noted regarding the cooperation and lack of conflict between non-motorized bicycling and snowmobiling.</p>
63-4	<p><i>We strongly support Alternative 4 as the only reasonable multiple-use alternative that reasonably meets the needs of the public. Alternative 4 is the only alternative keeping Mount Jefferson open to snowmobile use. We strongly support continued snowmobile use in the Mount Jefferson and Upper Hellroaring Creek drainage to the Continental Divide.</i></p> <p><i>We strongly support snowmobiling in Sullivan creek and Barker Lake on the shoulders of the Anaconda-Pintler, and high basins of the West Pioneers including Lost Horn Mountain and Grouse Lakes.</i></p>

Letter & Comment #	Comment (in <i>italics</i>) and Interdisciplinary Team Response
	Response: Your support of Alternative 4 is noted.
63-5	<p><i>The DSEIS must adequately recognize the significant negative cumulative impacts that have occurred from all the motorized snowmobile and OHV closures in the BDNF and in the surrounding forests in Montana. Our Motorized recreational opportunities have been severely impacted.</i></p> <p>Response: Cumulative effects from travel management decisions of neighboring land management agencies are disclosed in the 2009 FEIS (pg. 400).</p>
63-6	<p><i>The closure of any additional snowmobile use in the BDNF will adversely affect the economies of many small communities. In fact some small communities will not withstand any more reduction in economic activity in their towns.</i></p> <p>Response: Please see response to comment 26-3.</p>
63-7	<p><i>With proper etiquette, snowmobile use has no significant impact on big game and wildlife. This can be addressed by adequate public education which has been in place for years and supported by the snowmobile community.</i></p> <p>Response: Please refer to the updated wildlife effects analysis in the FSEIS. Additionally please see responses to comments 153-4 and 153-5.</p>
63-8	<p><i>There is virtually no impact to the natural environment because our machines never touch the ground.</i></p> <p>Response: Your observations are noted and similar to those disclosed in the DSEIS starting at page 92.</p>
63-9	<p><i>Snowmobile use in Montana generates over \$100 million in direct resident spending every year. Not to mention the social benefits of this family oriented activity.</i></p> <p>Response: Your views and observations are noted Please see response to comment 26-3.</p>
63-10	<p><i>We have never experience any user conflicts when we have snowmobiled and when we have cross-country skied on snowmobile trails. Snowmobilers have always been very courteous.</i></p> <p>Response: Your observations are noted.</p>
64	<p><i>I am writing to voice my support for quiet trails. Motorized recreation harms resources and ruins the woods for humans seeking a break from the noise and pollution of the modern society.</i></p> <p>Response: Your support of non-motorized trails is noted. The DSEIS discloses the effects of winter motorized use on numerous resources.</p>
67	<p><i>It is impossible to observe wildlife from a motorized vehicle, or even a bicycle. If the noise doesn't terrorize wildlife then the rapid movement of a vehicle will. We need to do all we can to insure that the peace and quiet of these special places, set aside many years ago, continue for the purpose they were intended. An undisturbed expanse where both nature and man can exist in quiet harmony. There are so few places left where this can happen. The shrill whine of</i></p>

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	<p><i>a snowmobile does nothing to enhance the experience but can definitely destroy it and cause life threatening fear in wildlife.</i> Response: Please see the response to comment 99-10.</p>
68-1	<p><i>The integrity of wilderness ecosystems and particularly wildlife values are threatened motorized vehicles such as ATVs and snowmobiles.</i> Response: On the BDNF all congressionally designated wilderness areas and areas recommended for wilderness in the 2009 Forest Plan are closed to motorized vehicles including ATVs and snowmobiles.</p>
68-2	<p><i>Several specific threatened areas have been identified, these include:</i> <ol style="list-style-type: none"> 1) <i>Mount Jefferson and the Hellroaring Creek Watershed</i> 2) <i>Sullivan Creek, around Barker Lake, and the shoulders of the Anaconda-Pintler</i> 3) <i>Large mammal winter range, including the Big Hole and the north side of the Flint Range</i> Response: Please see responses at comments Varies-1, Varies-2 and Varies-4.</p>
68-3	<p><i>As Montana grows in population, the need to protect our wilderness areas for the current growing population and future generations becomes more critical. The US Forest Service must play a central role in protecting Wilderness. Jim Furnish’s book Toward a Natural Forest addresses this expanded role of the USFS, The Enduring Wilderness by Doug Scott eloquently documents why we must preserve the values identified by Muir and Leopold. I urge you to lead in amending the current Plan to better protect Wilderness values!</i> Response: Please refer to the response to comment 68-1.</p>
70-1	<p><i>I Think snowmobiling should remain unchanged in the Beaverhead/deerlodge area. I grew up snowmobiling in these areas and I’m not taking my 3 year old son in many of the same areas my dad took me.</i> Response: Your support of Alternative 6-Modified is noted.</p>
70-2	<p><i>I have never seen any big game in any of the areas I have ridden in the winter. The snow is deep obviously.</i> Response: Your personal observations of wildlife use in the area during the winter is noted. Please see the response to comment 1-2.</p>
71-1	<p><i>I am in favor of banning snowmobiles in winter range as the assaulting noise is disturbing to mammals in their winter range.</i> Response: Please see the response to comment 99-10.</p>
71-2	<p><i>I am deeply concerned about watershed protection as this issue is going to start haunting all Montanans unless protections are put into place. Just look at the water problems/water quality problems that the entire rest of the nation is facing right now.</i> Response: Potential effects to watersheds are disclosed in the SEIS (DSEIS beginning at pg. 93).</p>
73-1	<p><i>Thanks for doing the right thing and protect this area to keep it clean. We don’t</i></p>

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	<p><i>need all places open to snowmobiling. There are plenty of places to go. Keep some things pristine and clean!</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
76-1	<p><i>Preserve the quiet and solitude of these areas for future generations.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
77-1	<p><i>The B-D is Montana’s largest National Forest. It is a tremendous resource for bow hunters, hikers, snowshoers and snowmobilers. Please adopt an amendment that balances a quiet wildlife habitat and winter range for big game with recreation</i></p> <p>Response: Your support of management that attempts to balance recreation and wildlife habitat is noted.</p>
80-1	<p><i>“This area must remain beautiful—without motorized toys for lazy people!!”</i></p> <p>Response: Your support of non-motorized recreation activities is noted.</p>
81-1	<p><i>As a home owner in the Big Hole Valley and a wilderness enthusiast I strongly urge you to do the right thing and protect these areas for non-motorized use.</i></p> <p>Response: We assume this comment is in reference to congressionally designated wilderness and areas recommended for wilderness in the Forest Plan. On the BDNF, these areas are closed to motorized use.</p>
85	<p><i>Please amend the forest plan to provide enhanced protection from habitat loss, and related environmental loss and degradation, from excessive overuse of motor vehicles, both summer and winter—ORV, 4-wheel drives, and snowmobiles.</i></p> <p>Response: The SEIS does not address ORV or 4-wheel drive use. The SEIS discloses effects of OSV use on big game winter range and several resources identified as minimization criteria. The comment does not provide information about where environmental degradation is occurring or where enhanced protection from habitat loss is needed.</p>
86-1	<p><i>I urge you to revise the current forest plan by maximizing protection of all big game winter ranges and major watersheds. Threats to these resources are motorized vehicle use including snow machines and ATV’s. Compelling evidence documents that motor vehicle use is incompatible with wintering big game and contributes to watershed deterioration by accelerating erosion, impacting native plant communities, and reducing groundwater storage.</i></p> <p>Response: Please refer to responses to comments 85 and 99-10. We are unaware of the compelling evidence that motor vehicle use is incompatible with wintering big game or reduced groundwater storage. The SEIS discloses the effects of OSV use to wintering big game, soils and vegetation on the BDNF.</p>
86-2	<p><i>Outdoor enthusiasts hiking and camping in forest basins deserve the solitude and quiet that can only exist without the noise and traffic of off-road vehicles.</i></p> <p>Response: Hiking and camping are typically summer recreation uses; not influenced by the OSV use being analyzed in the SEIS.</p>

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87-1	<p><i>We need motorized access to Mount Jefferson and the ultimate headwaters of the Missouri River by keeping the upper Hellroaring Creek drainage to the Continental Divide. Access to these areas provides support to surrounding communities such as W Yellowstone, Island Park, Rexburg, Idaho Falls, Ennis and many more small communities many of whom are just hanging on because of the lost the opportunity of logging. Such access will allow forest restoration due to removal of diseased trees as well as world-wide attractions of wilderness exploration.</i></p> <p>Response: Alternatives 1, 4 and 6 Modified continue OSV use in the headwaters of Hellroaring Creek. The 2009 Forest Plan identified areas suitable for timber harvest. This SEIS does not supplement the 2009 FEIS analysis of areas suitable for timber harvest.</p>
87-4	<p><i>We are losing our forests to forest fires because we are unable to remove diseased trees without access. Our forests all around are weakened and threatened due to environmental restrictions that prevent maintenance of healthy forests.</i></p> <p>Response: Please refer to the purpose of the SEIS (DSEIS, pg. 6). Removing diseased trees to promote forest health is not associated with the purpose of the SEIS.</p>
87-5	<p><i>Recreational interests and forest health must be balance with preservation of wildlife habitat.</i></p> <p>Response: Please refer to the response to comment 87-4 for information about forest health. Your support for balancing recreation interests with wildlife habitat is noted.</p>
89-1	<p><i>I understand that your mission is not only to protect wildlife but human use of land as well. But to allow snowmobiles in another area reserved for animals in a state of a million people is absurd.</i></p> <p>Response: We found this comment confusing because we could not discern what area the reviewer is referencing. There are no areas on the BDNF reserved exclusively for wildlife. The 2009 FEIS and the 2015 DSEIS disclose the effects of OSV use on wildlife.</p>
89-2	<p><i>The Missouri river headwaters are put in danger of pollution by snowmobiles and their users. Trash is already piling up in many forests that these sort of recreationists are allowed.</i></p> <p>Response: The portion of the BDNF located east of the Continental Divide is part of the headwaters of the Missouri River. The SEIS (DSEIS, pg. 93) discloses there is minimal risk to water quality related to OSV emissions on the BDNF. Human presence on the National Forest poses a risk of littering. However, we are unaware of any specific areas on the National Forest where this risk is inherently higher due to the presence of OSVs.</p>
89-3	<p><i>Snowmobiling shouldn't be allowed period. Big game animals only have so</i></p>

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	<p><i>many places to be forced to live due to human encroachment on any available land. To then allow these animals to be disturbed, potentially even harassed by snowmobiles. Quiet recreation allows a healthier interaction between wildlife and humans.</i></p> <p>Response: Complete prohibition of OSVs is not consistent with the multiple use mandate of the National Forest System. The SEIS discloses the effects of OSV use on potential harassment of wildlife and significant disruption of wildlife habitat (DSEIS beginning at pg. 95). We are unaware of any scientific literature supporting the statement that quiet recreation allows healthier interactions between wildlife and humans.</p>
89-4	<p><i>These areas listed for potential use are too many, there's no logical reason to allow that many acres and acres be open to a few who want to just explore on a loud machine. Close the areas with little use, as once the big game animals are bothered a couple of times they will avoid the area.</i></p> <p>Response: Please see the response to comment 100-23. The SEIS will be updated with consideration of alternatives including this one recommending closing areas currently experiencing little OSV use.</p>
89-5	<p><i>While your position is to make places for animals and humans, the human part seems to increasingly want more of the proverbial pie. Land needs to be preserved for FUTURE use, not to whoever whines the loudest for government attention and will take away from the quiet, wild nature.</i></p> <p>Response: The 2009 Forest Plan attempts to balance the multiple use mandates for managing the BDNF. We disagree with this reviewer's comments that humans want more of the proverbial pie and whoever whines the loudest will take away from quiet, wild nature. There are a whole host of uses addressed by the Forest Plan. Some individuals/organizations desire more of a certain use, other desire less of the same use.</p>
90-1	<p><i>Please take action and stop all motorized winter use in the Mt. Jefferson area. As our beautiful National Forests see more and more use the only possible path to protection is to STOP all motorized use.</i></p> <p>Response: Alternatives 2, 3 and 5 consider closing all of the BDNF near Mount Jefferson.</p>
91-1	<p><i>...I have always been very careful where ever I snowmobile to make sure that there is plenty of snow cover so I don't harm the vegetation, I stay away from open water ways so not to foul our watersheds, and I am very careful that I do not disturb the wildlife in any area I snowmobile in! My snowmobiles are well maintained, inspected on a regular bases [sic], and have factory exhaust systems. We stay on the trails, and watch out for others on the trails, including cross country skiers, which is very to see a skier in the back country, unless they are using a snowmobile to access the high country. I am not only speaking about myself, all of the people I snowmobile with feel the same as I do about</i></p>

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	<p><i>being “light on the land”. This is our backyard, and we will always do everything in our power to take care of it so myself and my children and my grandchildren will be able to see this Beautiful country we call home!!</i></p> <p>Response: Thank you for using ethical snowmobiling practices and respecting other recreationists and natural resources.</p>
96-1	<p><i>Much as I was taught by my family and the numerous peers that I grew up around, the right to enjoy the National Forest should be ours to keep and in turn we must respect and care for everything that makes it so beautiful. I still recreate in many different ways around numerous parts of Montana and have found that the numerous different persons I share my passions with also share the same respect for this great landscape.</i></p> <p>Response: Thank you for your continued respectful use of the National Forest System.</p>
97-1	<p><i>...We ride our horses all over BDNF- especially multiple day trips in W pioneers. It is already a nuisance with motorcycles & 4 wheelers & they are not conducive to riding or hiking. Let’s try to scale down all motorized use in these fragile areas. Winter snow machine use is also noisy & scares moose & elk. There is room for these motor users but let’s keep them off the fragile high country & proposed wilderness zones.</i></p> <p>Response: Please refer to the purpose for this project (DSEIS, pg. 6). Use of the BDNF by horses typically does not occur simultaneously with OSV use. Alternatives considered in the SEIS do not propose motorized use in recommended wilderness areas.</p>
99-1	<p><i>Under the OSV rule (subpart C of the Forest Service’s travel management regulations), each national forest unit with adequate snowfall must designate and display on a map a system of areas and routes where OSV use is permitted based on protection of resources and other recreational uses. (36 C.F.R. part 212, subpart C, 80 Fed. Reg 4500[Jan. 28, 2015]).</i></p> <p>Response: The 2009 FEIS and SEIS analysis is consistent with 36 CFR 212 Subpart C (Jan. 28, 2015).</p>
99-2	<p><i>The new rule requires each National Forest unit with adequate snowfall to designate and display on an OSV use map a system of areas and routes where OSVs are permitted to travel; OSV use outside the designated system is prohibited (36 C.F.R. §§212.81, 261.14). Thus, rather than allowing OSV use largely by default wherever that use is not specifically prohibited, the rule changes the paradigm to a “closed unless designated open” management regime. This paradigm shift entails significant changes in how snowmobiles are managed on National Forest lands. Forests must apply and implement the minimization criteria when designating each area and trail where OSV use is permitted, (36 C.F.R. §§212.81[d]. 212/55[b]), not as a means of justifying existing management. Any areas where cross-country OSV use is permitted</i></p>

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	<p><i>must be “discrete, specifically delineated spaces[s] that [are] smaller...than a Ranger District” and located to minimize resource damage and conflicts with other recreational uses (36 C.F.R. §§212.1, 212.81[d], 212.55[b]).</i></p> <p>Response: Please refer to the response to comment 99-1.</p>
99-3	<p><i>While this approach will result in fewer acres available for OSV use, it will not significantly reduce the number of usable acres open to OSVs. Keeping low-elevation areas, thickly treed areas, windswept ridgetops, and other such areas open to OSVs gives a false perception of opportunity and presents a management issue when these areas do receive snow. It also falls short of considering how advances in OSV technology have improved, and will continue to improve, access to places where machines once could not reach.</i></p> <p>Response: This comment suggests reducing areas open to OSV because some areas are not physically usable by OSVs all of the time. However, the comment does not reflect any impacts on resources occurring when there is sufficient snow for use. The SEIS discloses potential impact during those periods when low elevations areas and windswept ridgetops receive sufficient snow for use. The 2009 FEIS projected increased OSV use and potential change in OSV technology. The SEIS will be updated to clarify how the analysis accounted for and addressed effects of existing and reasonably foreseeable OSV technology.</p>
99-4	<p><i>...much of the Bell Lake trail is open to motorized use despite the fact that it dead-ends at a non-motorized basin and motorized use on the trail poses a conflict with backcountry skiers. The area around this trail is thickly treed and snowmobiles are physically restricted from leaving the trail. However, with the advent of snow-bikes, converted dirt bikes with one ski and a narrow track, motorized use is no longer confined to the trail and use conflicts have increased. Closing the Bell Lake trail (USFS trail 6305) to motorized use would alleviate this conflict.</i></p> <p>Response: Thank you for this site-specific comment. Information about this comment will be included in the FSEIS for the Tobacco Root landscape. The lower portion of the Bell Lake trail is open to OSVs, including snow bikes. The upper portion is closed to OSVs.</p>
99-5	<p><i>Given that the Forest Service did not include the minimization criteria in the original EIS [conversation with Jan Bowey, Jan. 27, 2016], we believe it is necessary for the Forest Service to include and analyze additional action alternatives in the SEIS. The current range of alternatives fails to minimize impacts and are not in compliance with the OSV rule.</i></p> <p>Recommendation (from reviewer): <i>Include and analyze additional action alternatives in the SEIS.</i></p> <p>Response: This reviewer in other comments provides specific recommendations. We respond to each recommendation as they are raised (example – refer to comment 99-4). The purpose of the SEIS is to comply with the August 27, 2015, US District Court for the District of Montana Order;</p>

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	including applying the minimization criteria in the 2005 Travel Management Rule (DSEIS, pg. 6) to the Forest Plan and to consider whether changes are needed.
99-6	<p><i>Designated OSV areas and trails on the BDNF must be located in a manner that minimizes harm to natural resources and wildlife, and reduces conflicts with non-motorized uses. When designating routes and areas for OSV use the Forest Service must apply the minimization criteria first and then determine where OSV use is appropriate. The court was very clear in this regard, stating there is “nothing...that allows the Forest Service to designate multiple areas for snowmobile use on the basis of a single forest-wide analysis and general decision making principles [WildEarth Guardians, 790 F.3d at 930].”</i></p> <p>Response: We are complying with the District Court Order by applying the minimization criteria to OSV use, not just on a forest-wide basis, but to landscape areas and site-specific areas where issues have been raised through comment and the three Forest Plan designated OSV routes. The analysis in the SEIS will assist the responsible official in determining if further change is needed (DSEIS, pg. 6).</p>
99-7	<p><i>While this draft SEIS is a step in the right direction, it does not satisfy the Travel Management Rule. None of the alternatives analyzed in this SEIS adequately protect wildlife winter ranges nor do any of the alternatives establish monitoring protocols to ensure that OSV use is not impacting soils, vegetation, and other forest resources.</i></p> <p>Response: Each alternative is analyzed in the SEIS in terms of impacts to wildlife winter range, soils, vegetation and other forest resources and how these criteria are protected. Monitoring of these resources does occur every time agency resource specialists are physically on-the-ground, they monitor resources through visual observations. In addition, monitoring is occurring in specific locations where impacts have been identified.</p>
99-8	<p><i>In addition, this SEIS fails to look forward and plan for a future with more backcountry users. Thus failing to comply with minimization criteria 3: Minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands.</i></p> <p>Response: Proposed use does equate to all possible, future use. Minimization Criteria 3 (motor vehicle use and existing or proposed recreational uses of National Forest System Lands or neighboring federal lands) is disclosed in the SEIS (beginning at DSEIS pg. 151). We will review and update this section of the SEIS with reasonably foreseeable proposals on neighboring federal lands.</p>
99-9	<p><i>The BDNF should follow this example (Bitterroot NF travel plan as described in Objection Reviewing Officer letter) and clearly show how each OSV trail and area relates to winter ranges and what impacts of use in these areas would be.</i></p> <p>Recommendation (from reviewer): Show how each OSV trail and area relates</p>

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	<p><i>to winter ranges and what the impacts of use in these areas would be.</i></p> <p>Response: The SEIS provides specific analysis looking at each landscape and site-specific areas where issues were raised. This included taking into account, within all areas open to OSV use, all effects on resources specific to the minimization criteria of OSV use on routes (groomed or ungroomed) in these open areas. Specifically, effects to winter range areas open to OSV travel included impacts of OSV routes in those areas. The big game effects section in the SEIS incorporates on-the-ground knowledge from local MFWP biologists. This on-the-ground knowledge of effects on winter range of OSV use in open areas include the effects of OSV use of routes within these open areas. Maps are provided of big game winter range and the snowmobile route maps. In areas open to OSV use snowmobiles are not restricted to a particular travelway or route and, as such, closing a route would not discontinue OSV use in the area.</p> <p>Also, incorporated by reference into this SEIS is analysis of the three routes designated for OSV routes by the Forest Plan. These routes occur in areas closed to OSV use in the 2009 Forest Plan. The 2012 FSEIS specifically analyzed the effects to big game winter range of these three designated OSV routes which occur in the Boulder River and Gravelly Landscapes. Please also see response to comments 100-51 and 100-52.</p>
99-10	<p><i>...in order to minimize impacts to wildlife the forest should not allow cross-country motorized travel within winter range or spring grizzly bear habitat. Likewise, high elevation areas that provide wolverine denning habitat, bighorn sheep, or mountain goat winter range should be closed to OSV use. The current management plan sets elevational boundaries designed, we assume, to protect these habitat types. However, elevational boundaries that are not based on any sort of reasonable topographical features are impossible for users to discern and nearly impossible to enforce. The Forest Service should utilize clear topographical features to establish boundary lines. It is effective to close an entire basin to OSVs than to try and enforce a closure that does not make sense on the ground. While this may lead to more acres being closed to OSVs, the legal requirements that the Forest Service operating under state that the Forest Service must minimize significant disturbance to wildlife habitat, not maximize opportunities for OSV use.</i></p> <p>Recommendation (from reviewer): <i>Align OSV use area boundaries with topographical features whenever possible.</i></p> <p>Response: The big game section in the FSEIS has been updated to incorporate landscape-specific comments from MFWP. There are only a few cases where MFWP biologists are seeing any harassment/disruption of big game habitats on (elk in the Boulder Landscape and moose in the Boulder and Gravelly Landscapes) from cross-country OSV travel (Pers. com. MFWP 2016). Based on previous comments from MFWP, Alternative 6 Modified incorporated</p>

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	<p>additional area closures in big game winter range in the Boulder Landscape to minimize potential disturbance/displacement/harassment of elk and moose from OSV travel on the winter range. During the 2016 analysis process, the harassment/disruption of moose on the winter range by OSVs in the West Fork of the Madison River area was identified by MFWP. The local MFWP biologist recommended an education plan that involves signing similar to those at the Konda Trailhead in the Boulder Landscape. The Madison District Ranger agreed to proceed with this signing plan (beginning with the 2016/2017 winter season) to minimize effects to moose wintering in willow bottoms along the West Fork of the Madison. There were no instances on any Landscape or site specific area where MFWP biologists identified harassment or significant disruption of mule deer, mountain goat or bighorn sheep habitat/populations as an issue from OSV travel (Pers. com. MFWP 2016).</p> <p>The DSEIS explains that the impact of concern to grizzly bears is to females with cubs. During consultation with the USFWS on Forest Plan activities, the USFWS stated that, "... spring snowmobiling areas and spring grizzly bear habitat are almost mutually exclusive in that the areas that would be suitable for spring snowmobiling (i.e. more snowpack) would not typically overlap with spring grizzly bear habitats (i.e. less snowpack in areas of early green-up)." The Forest Plan Biological Opinion discuss that the potential interaction between OSV use and females and cubs is between third week of March and May 15 (the end of OSV travel on the BDNF). Such interaction would be limited due to low number of denning bears and the abundant amount of denning habitat. In the conclusion the USFWS states, "... the Service does not expect impacts to spring habitat and foraging grizzly bears to rise to the magnitude that would injure grizzly bears" (USFWS, 2013b). There was no requirement from USFWS to further reduce the OSV travel in spring grizzly bear habitat. The effects section for grizzly bears in the FSEIS has been updated to incorporate additional effects information about spring grizzly bear habitat.</p> <p>The wolverine effects section in the FSEIS has been updated to incorporate additional research (Inman 2013). Although the effects analysis using the latest model portraying wolverine maternal habitat shows potentially more modeled maternal habitat (Inman 2013 vs Heinemeyer 2010 models) is open to OSV travel, there is still no additional evidence that winter recreation, motorized or non-motorized, has negative effects on wolverines (pers. comm. Inman 2016, USFWS 2013).</p> <p>In other comments this reviewer provides site-specific recommendations for topographic-driven boundary changes. These recommendations are addressed in the applicable comment.</p>
99-11	<p><i>...given mountain goat distribution on the BDNF, closing those basins that provide winter range will not significantly decrease the amount of high quality snowmobile opportunity on the forest.</i></p>

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	<p>Response: As mentioned in the response to comment 99-9, the big game section in the FSEIS has been updated to incorporate landscape-specific comments from MFWP. Additionally please refer to comment 7-1.</p>
99-12	<p><i>The BDNF has documented that OSV recreation causes harm to the forest’s natural resources and wildlife, and conflicts with non-motorized uses of the forest. The 2010 ROD for the current forest plan acknowledges that “snowmobiles do cause short term physical and social impacts (2010 ROD, pg 7) and “unmanaged expansion has resulted in resource damage, wildlife impacts, and competition and conflict between user groups (2010 ROD, pg. 13). Amplifying the problem, OSV use on the BDNF has dramatically increased both in terms of numbers of users and their ability to access more remote and challenging terrain due to more powerful vehicles. The 2009 FEIS states that “as a result of more powerful engines that allow more extreme and widespread OSV use, impacts on other resources are more serious and further-reaching than ever before” (2009 FEIS, pg. 510).</i></p> <p>Response: These statements cited in 2009 FEIS and 2010 ROD were an acknowledgment of general issues on the Forest. In response the Forest proposed closing additional areas to OSV use. Following signature of the 2010 ROD, more than 1,000,000 acres of the BDNF was closed to OSVs. And, this 2016 SEIS specifically considers these issues in terms of OSV use specific to landscapes and site-specific areas.</p>
99-13	<p><i>...one area of the forest where OSV use has been consistently monitored – Mt Jefferson – the Forest Service and Winter Wildlands Alliance have documented serious impacts to other forest uses (OSV use within non-motorized areas, OSV use within the adjacent non-motorized BLM Wilderness Study Area) and wildlife habitat (OSV use within a late-season closure designed to protect grizzly bears [2015 and 2014 Mt Jefferson monitoring report]). If the Forest Service had monitoring plans in place for other areas of the forest there would be additional officially documented impacts, but the SEIS implies that OSV use does not cause harm to forest resources or other uses (DSEIS, pg. 92).</i></p> <p>Response: Monitoring reports from Mt. Jefferson document OSV incursions into the closed area near Mt. Jefferson. These incursions are disclosed in the SEIS (DSEIS, pg. 156).</p> <p>Although the Forest Service does not have area-specific monitoring in place for OSV use across the forest, MFWP biologists fly a majority of the Forest during the winter to monitor big game populations. They generally record other animals observed as well as potential impacts. As mentioned in the responses to comments 99-9 and 99-10, there are only a few cases where MFWP biologists are seeing any effects to wildlife species (moose) from OSV travel. The effects of these are disclosed in the SEIS OSV travel in general big game, bighorn sheep, or mountain goat winter range on the Forest. In reference to grizzly bears, please see the response to comment 99-10.</p>

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99-14	<p><i>This position [see comment 99-12, above] contradicts the Forest’s own findings and runs contrary to what the Forest Service has documented elsewhere. For example, the Lassen National Forest acknowledges the following potential impacts of OSV use: ground disturbance (similar in nature to summer motorized use if there is insufficient snow), snow compaction, erosion, alternation [sic] of surface runoff and ground water flow, release of unburned fuel and lubricants into the environment, disturbances to terrestrial and aquatic wildlife such as displacement, direct/indirect/cumulative injury, mortality and habitat disturbance (Lassen NF OSV Designation DEIS, Jan 2016, pp. 10-12). We ask that the BDNF identify how each of the trails and area boundaries in each Alternative have been located to minimize these impacts.</i></p> <p>Response: As discussed in responses to comments 99-12, the 2009 FEIS acknowledged the general issues raised related to the impacts of OSV and proposed closing additional areas to OSV use. Following signature of the 2010 ROD, more than 800,000 additional acres of the BDNF was closed to OSVs. This SEIS does not contradict the agency’s findings as the SEIS considered current conditions disclosing that, while the impacts may occur, BDNF resource specialists are unable to identify where the impacts are occurring to such an extent they can be discerned on the ground. In addition, while public comment expressed a concern that the impacts are occurring, after analyzing more than 200 comment letters, site specific, on-the-ground impacts to these resources also were not identified.</p> <p>The referenced pages in the Lassen National Forest’s DEIS, describe significant issues addressed in the DEIS. The Lassen National Forest is located in the Sierra Nevada Mountains in California. The BDNF is located in the Northern Rockies in Montana. Differences in analysis conclusions between the Lassen National Forest DEIS and this SEIS are attributed to appropriate geographic and use differences between the Forests. For example, the Lassen National Forest DEIS discloses a concern with potential ground disturbance from cross country OSV use similar in nature to summer motorized use if there is inadequate snow cover (Lassen NF, DEIS, pg. 11) and prescribes a minimum snow depth in subsequent action alternatives. This concern on the Lassen National Forest varies from the conclusion on the BDNF that the on-the-ground effects are negligible. OSV use on the BDNF in the presence of inadequate snow cover is not occurring to the extent we can geographically identify locations where there are impacts.</p>
99-15	<p><i>The Draft SEIS does not adequately describe the social and economic conditions relating to this analysis...this draft SEIS focuses solely on the motorized element of this equation. Non-motorized winter recreation – cross-country skiing – consistently accounts for more visits to this forest than snowmobiling in all National Visitor Use Monitoring (NVUM) studies. The most recent NVUM survey for the BDNF found that 12.2% of visits to the BDNF involved cross-</i></p>

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	<p><i>country skiing while only 1.7% of visits involved snowmobiling (NVUM survey for the BDNF, Round 3 data). We recommend the Forest integrate this information into the decision-making process. Hundreds of backcountry skiers have stayed at the Hellroaring Hut and Bell Lake Yurt...many small businesses in the region that equip and service backcountry skiers depend on the public having access to opportunities for non-motorized recreation for their long-term economic viability. While we do not dispute that snowmobiling is an important aspect of Montana’s recreational and economic landscape, but it is only part of the story. The SEIS must paint a more complete picture of the social and economic realities of winter recreation on the BDNF.</i></p> <p>Recommendation (from reviewer): <i>Describe the economic and social value of non-motorized recreation on the BDNF.</i></p> <p>Response: The draft and final supplemental EIS does include the 2010 NVUM data as provided in the comment. However, the NVUM provides a ‘snapshot’ of annual National Forest visitation, and due to certain limitations, its creators caution against its use to ascertain trends. The NVUM is conducted once every 5 years, and provides a standardized estimate of visitation; however, it is subject to the effects of changing field conditions that may have affected visitation, respondent bias, and surveying and data collection errors. Therefore, the NVUM is one of several social and economic indicators used to assess recreation use. It is unclear whether non-motorized or motorized winter recreation are the greater economic contributors to the local outdoor industry; none-the-less, the agency does not base allowable uses on the quantity of people participating in that type of use. The Forest acknowledges that both non-motorized and motorized winter recreationists enjoy and value the Beaverhead-Deerlodge National Forest, and are important contributors to the local outdoor and hospitality industry. More information about the NVUM can be found at: http://www.fs.fed.us/recreation/programs/nvum.</p>
99-16	<p><i>The Forest Service is legally obligated to minimize harassment of wildlife or significant disruption of wildlife habitats and the Alternatives presented in this SEIS fail to meet this standard. However, the Alternatives grossly under-protect winter range across the BDNF (for example, see Table 21 which shows that the majority of general big game winter range across all forest landscapes, in all Alternatives is open to cross-country OSV use) despite clear scientific consensus that unpredictable (cross-country) motorized travel in winter range stresses wildlife and elicits behavioral responses including displacement and avoidance (DSEIS, pg. 40-42, Winter Wildlands Alliance Best Management Practices, pg. 9-12 & Winter Wildlands Alliance Environmental Impacts from Snowmobile Uses pg. 2-5) The draft SEIS make the assumption that because ungulate populations on the forest are currently doing well, OSV within winter ranges must have minimal impact.</i></p> <p>Response: It is important to note in DSEIS Table 21 that these percentages</p>

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	<p>portray big game winter range on NFS lands only, not across the entire big game winter range. Across the entire winter range, only 30% of the big game winter range is on lands administered by the BDNF, with the remaining 70% in other land ownership. In response to this comment, existing big game winter range percentages and effects have been updated Forestwide and in each landscape discussion in the FSEIS to illustrate the scope and scale of NFS lands across the entire big game winter range. Please refer to responses to comments 99-9 and 99-10 and each species section in the SEIS for effects to species known to occur from OSV travel. Potential effects to wildlife described in public scientific literature are acknowledged and were incorporated into the analysis for each species. Please refer to the updated effects sections for wolverine and grizzly bear in the SEIS. For all species analyzed, although potential effects to individuals are noted, there is no evidence in the site specific, landscape level analysis that OSV travel is negatively affecting any wildlife populations on the BDNF.</p>
99-17	<p><i>...the Forest Service also claims in this this [sic] analysis that because agency employees have not noticed any glaring impacts to soils, vegetation or other forest resources – despite a lack of any monitoring to look or evaluate such impacts – that these impacts must not exist (DSEIS, pg. 92). These claims ignore the best available science that we have previously provided to the Forest Service.</i></p> <p>Response: Documents previously provided by this reviewer include:</p> <ul style="list-style-type: none"> • Environmental Impacts From Snowmobile Use, undated, produced by Winter Wildlands Alliance • Snowmobile Best Management Practices for Forest Service Travel Planning – A Comprehensive Literature Review and Recommendations for Management, April, 2015, produced by Winter Wildlands Alliance. • Winter Recreation on National Forest Lands – A Comprehensive Analysis of Motorized and Non-Motorized Opportunity and Access, June, 2015, produced by Winter Wildlands Alliance. <p>While providing useful information, these documents do not comprise the sole source of best available science. The SEIS (DSEIS pgs. 93-95) summarizes a review of scientific literature. Most of these citations are the same as those cited in the documents provided by the reviewer. While Winter Wildlands Alliance conclude their review of “Scientific evidence indicates that over-snow vehicles (OSVs) produce significant impacts on animals, plants, soils, air and water quality, and the ecology of entire winter ecosystems” (Environmental Impacts from Snowmobile Use, pg 1), the SEIS considered the science in looking at effects on the BDNF. The SEIS discloses the effects looking at the area (acreage) open to OSVs including relying on on-the-ground field expertise of a variety of agency scientists (soil scientists, fisheries biologists, recreation</p>

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	<p>managers, silviculturist and rangeland management specialists) who, through decades of observation on the BDNF, have not observed these effects at a noticeable, or discernable level. Availability of deep snow, natural terrain and vegetation and infrequent OSV use in low snow conditions on the BDNF has resulted in few observable effects to soil, watershed, vegetation and other forest resources on the BDNF.</p>
99-18	<p><i>...while this analysis does highlight the ongoing use conflict occurring on Mt Jefferson as a result of the unenforceable and oft-ignored non-motorized closure, it fails to adequately capture the impact that this non-compliance is having on recreational uses, and other management uses, within the neighboring BLM Wilderness Study Area. The Forest Service should consider how unauthorized OSV use within non-motorized areas on Mt Jefferson is currently impacting, and will continue to impact, other uses.</i></p> <p>Recommendation (from reviewer): Amend the Forest Plan or issue a site-specific decision to close Mt Jefferson to winter motorized use in order to minimize impacts to other uses.</p> <p>Response: The area on the BDNF adjacent to the BLM Wilderness Study Area is closed. The Forest acknowledges non-compliance occurring in the Mt. Jefferson area and is monitoring and taking actions that are reducing non-compliance with the closure order in partnership with the BLM and other partners. Please see response to comment 25-1.</p>
99-19	<p><i>...the Forest Service’s plan leaves more than 60% of winter range open to snowmobiles and other motorized winter recreation. Currently, 91% of the Big Hole winter range, 83% of the north side of the Flint winter range, and 77% of the Pioneer Winter Range are open to snowmobile use (DSEIS, pg. 42). Although the non-motorized allocations in each Alternative analyzed in the draft SEIS were “designed to protect low elevation winter range for deer, elk and moose: [and protect high elevation secure habitat for mountain goat and wolverine” (2009 FEIS pg. 20) the protection is inadequate for these species. Forest-wide, the percentage of big game winter range open to motorized travel across the Alternatives ranges from 83% to 57% (DSEIS, pg. 42). The current management plan leaves up to 91% of big game winter range open to OSV use.</i></p> <p>Response: Please see the response to comment 99-16. There is no evidence that this protection is inadequate to support healthy wildlife populations on the BDNF and to prevent significant disruption of wildlife habitats.</p>
99-20	<p><i>Likewise, significant amounts of critical habitat for mountain goats, bighorn sheep and wolverine remain open to OSVs in the current forest plan and in the analyzed Alternatives.</i></p> <p>Response: Please see responses to comments 7-1, 9-10 and 99-16.</p>
99-21	<p><i>The draft SEIS acknowledges that motorized activities on winter range negatively impact wildlife (DSEIS, pg. 41) yet the Forest Service doesn’t take</i></p>

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	<p><i>meaningful steps to minimize these impacts. The Forest Service uses flawed logic to justify leaving high value winter ranges open to unregulated OSV use by stating that these areas see intermittent or no winter motorized travel, even while acknowledging that if motorized use were to occur in these areas wildlife would be disturbed or displaced. For example, the draft SEIS states that the northeastern portion of the Big Hole landscape is high value winter range, yet only 4% of this landscape is currently closed to OSV use even though the Forest Service acknowledges that OSV use on this winter range can disturb or displace elk, moose and mule deer (DSEIS, pg. 50). Given that the Forest Service has acknowledged the impact that OSV use has on ungulates, and stated that the public does not utilize these areas for winter motorized recreation, we do not understand why the Forest Service would not hesitate to close these areas to motorized use. Doing so will not diminish OSV recreation opportunities and will provide certainty for wildlife management and minimize impacts to these species.</i></p> <p>Response: The SEIS has been updated with further descriptions concerning the amount, value and actual use of big game winter range as described by local MFWP wildlife biologists. Please refer to the SEIS big game winter range analysis section describing high value winter range. There is no evidence that additional closure of intermittent or seldom used areas is needed to support healthy wildlife populations on the BDNF or prevent significant disruption of wildlife habitats. Please see responses to comments 99-16 and 32a-2.</p>
99-22	<p><i>The draft SEIS does not describe how designated routes have, or would be located to minimize impacts to wildlife. Instead, the Forest Service seems to imply that if wildlife are bothered by motorized use they can simply relocate elsewhere. For example, page 56 of the draft SEIS states “there is a chance that if elk, moose or mule deer south of Deer Lodge are near the regularly used routes they could be disturbed or displaced by winter motorized traffic. In this case there are non-motorized area near these high use routes that animals could move in to...” This assumption – that animals will just go someplace else when occupied habitat is impacted – has often been relied upon in the context of oil and gas development proposals to downplay the potential impacts to wildlife. This assumption is disproven by biologists and cannot be relied on in the context of motorized use impact any more than in the context of energy development (Wyoming Game & Fish, 2010), pg. 11).</i></p> <p>Response: The Wyoming Game & Fish, 2010 report concerned effects to big game and habitat loss from continuous well pad operation. This cannot be compared to effects to big game from temporary displacement from intermittent/transitory snowmobile use. Knight and Temple 1995 reviewed research on snowmobile effects to wildlife and found that although there are many differing reactions it was noted that many behavioral responses are of short duration. Studies cited found that deer were temporarily displaced from</p>

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	<p>trails and in one case the deer increased their home range and in two cases, although deer moved away from the trails, did not expand their home range. Please see the wildlife report in the project file for further information on potential general effects to big game from OSV travel. Additionally please see responses to comments 99-9 and 99-10.</p>
99-23	<p><i>Page 41 of the draft SEIS discusses the idea that ungulates can habituate to motorized use and, when habituated, are less stress by motorized activity. This is true and we are not opposed to designated routes through winter ranges. However, later in the analysis, the Forest Service misinterprets this finding to justify cross-country use through winter ranges by stating that elk, bighorn sheep, moose, and mountain goats habituate to motorized activity. This is contrary to the very studies the Forest Service relied on in their analysis, which specifically stat that wildlife can habituate to motorized use so long as that use is confined to predictable routes (DSEIS. Pg. 41).</i></p> <p>Response: The DSEIS on page 41 states, “Wildlife may become conditioned to human activity when the activity is controlled, predictable, and not harmful to the animals.....Many management recommendations prefer use to be limited to trails so animals can predict use.” It does not state as the reviewer suggests that routes are the only predictable use. The analysis does consider regular use cross country areas as predictable as regular use routes. Additional information on the effects of winter recreation on ungulates from Knight and Gutzwiller (1995) state that, “The literature on ungulates is large enough to show the flexibility of mammalian habitat use in the face of disturbances. If noisy sources enter the habitat on a schedule (e.g., snowmobiles on weekends, construction noise), deer, sheep, and elk avoid areas when the noisy sources are present and return when they are not (Van Dyke et al. 1986; Dorrance et al. 1975; Edge and Marcum 1985; Leslie and Douglas 1980). If the exposure is brief or if mammals have good cover, differences in home-range size are not detectable (Eckstein et al. 1979; Edge et al. 1985). If mammals are exposed repeatedly to the same noisy stimulus without harassment, responses decline rapidly (Krausman et al. 1986; Valkenburg and Davis 1985).” Additionally, please see the response to comment 99-10.</p>
99-24	<p><i>We are unsure how the Forest Service determined that “habituated” animals are not impacted by OSV use. As the draft SEIS states, wildlife show no outward signs of stress may still be experiencing physiological signs of stress (Borkowski, et al, 2006). Researchers found that stress hormones in elk living in Yellowstone National Park fluctuated weekly, rising and falling in direct correlation with snowmobile activity (Creel, et al, 2002). Chronically elevated stress hormone levels can have a deleterious effect on wildlife and result in health and fitness costs (Creel, et al, 2002).</i></p> <p>Response: The DSEIS on page 41 acknowledged potential effects to big game species from habituation. As mentioned in the response to comment 99-9, the</p>

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	big game section in the FSEIS has been updated to incorporate landscape-specific and site-specific comments from MFWP. Although potential effects to individuals were acknowledged, none of the MFWP biologists consulted identified OSV travel as an issue for any of the big game populations across the Forest.
99-25	<p><i>The Forest Service cites only one study – Oliff et al. 1999 – in their analysis of mountain goats. The Forest Service cites Oliff to say that “because mountain goat winter range is inaccessible and precipitous, goats and recreations are not often coming into conflict...” (DSEIS, pg. 40). Although there are no studies specifically looking at how OSVs impact mountain goats, given what we know about how motor vehicles negatively impact goats, we can assert that snowmobiles and mountain goats don’t mix...While it is true that people likely do not ride their OSVs onto snow-free ridges or rocky ledges and not physically running goats over, highmarking the slopes between and below these areas potentially causes physiological stress and displacement into less suitable habitat. Mountain goats have extremely limited winter range and are very vulnerable to disturbance on these winter ranges. Therefore, it is important that the Forest Service protect this winter range by closing not just the open ridges where the goats tend to congregate, but also the surrounding basins, to OSVs.</i></p> <p>Response: Please see responses to comments 7-1 and 99-10.</p>
99-26	<p><i>...current OSV management on the Beaverhead-Deerlodge is failing to prevent impacts to mountain goats in the Tobacco root landscape. Goats inhabit many areas in the Tobacco Roots, including the Granite Lake basin [sic]. This area has an elevational closure to “protect” goat habitat. However, elevational closures don’t translate to understandable or enforceable boundaries on the ground and OSVs frequently travel above this boundary and into goat habitat. We recommend closing the entire Granite Lake basin to OSVs.</i></p> <p>Response: Mountain goat winter range is not mapped in the Tobacco Root Mountains (DSEIS, pg 84 and Appendix C). Although there are mountain goats wintering in the Tobacco Roots, the local MFWP biologist did not identify OSV travel in the Tobacco Root Mountains (including the Granite Lake area) as a concern for mountain goats. MFWP stated that mountain goats in the Tobacco Root Landscape winter on the west side of the landscape in lower elevation, rocky, mountain mahogany areas that are not conducive to OSV travel. Granite Lake is located on the east side of the landscape at higher elevations. Please refer to the updated big game section, specifically Tobacco Root Landscape, Mountain Goat, in the FSEIS. Please see the response to comment 7-1. Alternatives 1, 2 and 4 propose leaving the Granite Lake basin open to OSVs. Alternative 3 proposes closing the entire basin to OSVs. Alternatives 5 and 6 Modified close the basin but leave the road corridor open to the lake.</p>
99-27	<i>...if wildlife are disturbed by OSV use then they can simply move into other</i>

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	<p><i>winter ranges to avoid this disturbance (Draft SEISpg.85). ...fails to take into account evidence that wildlife select the most appropriate habitat and displacement into other areas necessarily equals displacement into less suitable habitat (WGFD, 2010.pg.11). The Forest Service must locate OSV areas and trails to minimize disruption of wildlife and wildlife habitat, not force wildlife into less suitable habitat in order to avoid disturbance.</i></p> <p>Response: Please refer to responses to comment 99-22 and 99-10.</p>
99-28	<p><i>All winter range on the Beaverhead-Deerlodge National Forest should be closed to cross-country OSV travel. It may be acceptable to allow travel on designated routes...but the Forest Service must show how these designated routes were located to comply with the minimization criteria.</i></p> <p>Recommendation (from reviewer): <i>Restrict OSV use on ungulate winter ranges to designated routes that have been located to minimize impacts to wildlife.</i></p> <p>Response: Please see the response to comment 99-10. The reviewer recommends closure of all winter range areas open to OSV travel. Currently under modified Alternative 6 - 37% or 728,380 acres of the 1,946,522 acres of general big game winter range is closed, 51% or 71,134 acres of the 138,494 acres of bighorn sheep winter range is closed and 59% or 288,363 acres of 486,219 acres of mountain goat winter range is closed. This recommendation would close all acres to cross-country travel. A recommendation to designate only open routes in big game winter range will be considered in the SEIS.</p>
99-29	<p><i>The only portion of the planning area where grizzly bears are fully protected from OSV use is within the Lee-Metcalf Wilderness. ...the fact that most of the forest is outside of the recovery zone does not mean that the Forest Service does not have to minimize impacts to grizzly bears across the forest. Minimizing conflicts with grizzly bears in the Gravelly landscape is essential for promoting wildlife connectivity. Page 110 of the draft SEIS acknowledges that is likely that bears in this landscape will, and do, have conflicts with OSV use.</i></p> <p>Response: Minimization of effects to grizzly bears from OSV travel on the BDNF is not limited to the grizzly bear Greater Yellowstone Ecosystem recovery zone located within the Lee-Metcalf Wilderness. For example, effects to grizzly bears in the Gravelly Mountains are reduced by closing an additional 25,987 acres of grizzly bear denning habitat in Alternative 6 Modified. Please refer to additional details, by landscape, for effects to grizzly bears in the SEIS (beginning at DSEIS, pg. 97). Potential impacts to grizzly bears from OSV use are primarily focused on effects to grizzly bears as they leave their dens and specifically sows with cubs; not connectivity because, during this time of year (spring), grizzly bears are not traveling across wide areas. Effects are reduced by closing OSV travel after May 15.</p>
99-31	<p><i>Mt. Jefferson, a central piece of the connectivity puzzle, is a prime example of how current management is failing to protect grizzly bear habitat from OSV impacts. There is a late-season (May 15) closure in the Hellroaring drainage</i></p>

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	<p><i>that is intended to protect spring grizzly bear habitat. ...difficult for the Forest Service to enforce this spring closure and, as a result, violations of the closure are common [sic] (USFS Monitoring Report, 2014). Because of this, and other ongoing problems with OSV management of Mt Jefferson, the Forest Service should prohibit OSVs on the east side of Mt Jefferson.</i></p> <p>Response: The east side of Mt. Jefferson is located on the Caribou-Targhee National Forest. The BDNF portion of Mt. Jefferson is not considered open after May 15. This seasonal restriction is not provided solely for the purpose of protecting grizzly bears. However, seasonal restrictions minimize effects to grizzly bears. Refer to the SEIS for additional discussion concerning Mt. Jefferson and grizzly bears.</p>
99-32	<p><i>Closing Mt. Jefferson will also help to minimize impacts to wolverine. ...wolverine on Mt Jefferson appear to be declining alongside the increase of OSV recreation. In their comments on the Revised Forest Plan, Montana Department of Fish, Wildlife & Parks noted that stress and displacement from cirque bowls may be responsible for wolverine population declines [sic]. In 2014 Winter Wildlands Alliance staff recorded wolverine tracks near the backcountry ski hut on Mt. Jefferson during their spring OSV monitoring survey (Photographic Evidence, 2014). Although portions of Mt. Jefferson were initially closed to protect known wolverine habitat, the Forest Service has documented violations on this closure each year since 2001 (Winter Use Report, 2014. Pg 2). The only way to effectively protect wolverine habitat on Mt. Jefferson is to engineer an enforceable boundary using the Continental Divide as a closure boundary.</i></p> <p>Response: The U.S. Fish and Wildlife Service and wolverine researcher and MFWP Carnivore Coordinator Bob Inman have stated that there is no evidence that OSV use is having negative effects on wolverine populations. However, Alternatives 2, 3, 5 reduce potential impacts to wolverine in the Mt Jefferson area (approx. 4,500 acres) by closing all modeled denning habitat in the area and modified Alternative 6 closes approx. 1,000 acres of modeled denning habitat. Further, we have no evidence that OSV use in a portion of the Mt Jefferson area is leading to a decline in wolverine populations in the area. There is no specific population information for Mt. Jefferson. Since the 2009 Forest Plan was originally put out for comment, additional research has been published on wolverines. According to the USFWS (2013d), “No systematic population census exists over the entire current range of wolverines in the contiguous United States, so the current population level and trends are not known with certainty.” We are unaware of your claim of photographic evidence of wolverine near the “backcountry ski hut” and whether it has been verified by specialists. The backcountry ski hut that you discuss is on Bureau of Land Management Land adjacent to the portion of the BDNF that is closed to OSV use. We would appreciate receiving your information regarding the claimed</p>

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	<p>wolverine tracks.</p> <p>As mentioned in the response to comment 99-10, the wolverine effects section in the FSEIS has been updated to incorporate additional research (Inman, 2013). Although the effects analysis using the latest model portraying wolverine maternal habitat shows potentially more modeled maternal habitat is open to OSV travel, there is still no additional evidence that winter recreation, motorized or non-motorized, has negative effects on wolverines (pers. comm. Inman 2016).</p>
99-33	<p><i>The Forest Service must minimize the negative impacts of OSV use on wolverines. It should start by determining how much of the areas and routes proposed to be open to OSV use have actually been used by snowmobiles. The 2009 Corrected FEIS⁷, acknowledges that "...snowmobile use may not currently be established in many areas where [wolverine] denning habitat exists" (BDNF Corrected FEIS, Appendix B, Revised BE pg. 99). If only a fraction of the historically open areas have been used by OSVs but the Forest Service decides to maintain these designations and the scope of OSV use increases, then habitat security will decline as compared to existing levels.</i></p> <p>Response: The wolverine effects section in the FSEIS has been updated to incorporate additional local research (Inman, 2013). Although the effects analysis using the latest model portraying wolverine maternal habitat shows potentially more modeled maternal habitat is open to OSV travel, there is still no additional evidence that winter recreation, motorized or non-motorized, has negative effects on wolverines (pers. comm. Inman 2016). The updated effects analysis does not show harassment to wolverine or significant disruption to wolverine habitat from OSV travel in wolverine denning habitat.</p>
99-34	<p><i>Areas on the forest that provide potential wolverine denning habitat and where the Forest Service should take steps to minimize OSV impacts on wolverines include:</i></p> <ul style="list-style-type: none"> • <i>East Pintler Recommended Wilderness-In particular, Tenmile, Twelvemile, and Sullivan Creeks should be protected.</i> • <i>East Pioneers</i> • <i>West pioneers-According to the Beaverhead Deerlodge's models wolverine denning habitat exists along the northeast and southwest margins of the West Pioneers Wilderness Study Area</i> • <i>West Big Hole</i> • <i>Lima/Tendoy</i> • <i>Southern Tobacco Roots</i>

⁷ Reviewers frequently reference the "Corrected FEIS". In response, the interdisciplinary team refers to the 2009 Corrected FEIS for the Beaverhead-Deerlodge National Forest Land and Resource Management Plan as the "2009 FEIS".

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	<ul style="list-style-type: none"> • <i>Cark Fork Flints[sic]</i> <p>Response: OSV use is prohibited in Recommended Wilderness (RWA), including the Anaconda Pintler RWA (Forest Plan, pg. 66-67. Tenmile, Twelvemile and Sullivan Creeks are not in a RWA. In the East Pioneers, the Torrey Mountain RWA is closed to OSVs (Forest Plan, pg. 214-215). Sixty two percent of the West Big Hole Management Area (Forest Plan, pg. 84-85), 45% of the Lima Tendoy landscape and 17% of the Clark Fork-Flints landscape is closed to OSVs (DSEIS, pg. 19-20). Since we do not have a management area identified as the Southern Tobacco Roots and the hydrologic divide between the Ruby, Madison and Jefferson Rivers does not lend itself to a north/south division in the mountain range, we are unsure of the geographic location for this reference by the reviewer. However, 52% of the Tobacco Root landscape is closed to OSVs (DSEIS, pg. 21). Forestwide, wolverine denning areas open to OSV travel is reduced from 64% to 31% in Alternative 6 Modified. In each of the above stated Landscapes, almost half of the wolverine denning habitat would be reduced under Alternative 6 Modified. The wolverine section of the FSEIS has been updated. Please see responses to comments 99-32, 99-33 and 148-11. While the West Pioneer WSA remains open to OSVs, wolverine denning habitat in numerous locations across the BDNF is closed.</p>
99-35	<p><i>The Beaverhead-Deerlodge provides potential habitat for Canada lynx (Lynx Canadensis) (79Fed.Reg.54, 782, 54, 818. 2014), a threatened species under the Endangered Species Act (ESA). Although not identified as “occupied” lynx habitat in the 2007 Northern Rockies Lynx Management Direction Record of Decision, the Beaverhead Deerlodge borders “occupied” lynx habitat on the Targhee, Gallatin, Helena, and Lolo National Forests (79 Fed. Reg. at 54, 820). The Helena and Lolo National Forests also contain designated critical habitat for lynx (79 Fed. Reg. at 54, 819). The Beaverhead Deerlodge is a critical corridor between these areas (Northern Rockies Lynx Amendment Area, http://databasin.org...) and lynx were historically present n Mt. Jefferson and likely other parts of the forest as well. In order to comply with the ESA and minimize OSV impacts on Canada lynx, the Forest Service must avoid lynx habitat when designating areas and trails for OSV use.</i></p> <p>Response: The BDNF is not occupied lynx habitat nor is there any designated lynx critical habitat on the BDNF. We had difficulty downloading the map at the web page referenced in this comment. However, the map referenced in the comment is Figure 1-1 of Northern Rockies Lynx Amendment Area map which is included as Appendix E in the SEIS. This map does not identify the BDNF as a critical corridor between the Targhee, Gallatin, Helena and Lolo National Forests it only identifies only specific locations of linkage areas on the BDNF which provides connectivity between blocks of lynx habitat (USFWS 2007b). The effects for Canada lynx section in the DSEIS starting on page 127 show that</p>

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	<p>the existing condition (Alternative 1) was included as part of the baseline analysis for the Lynx Conservation Assessment Strategy (2000) and the subsequent NRLMD. This direction was consulted on with USFWS. The Lynx Amendment did not include or identify any need for dispersed over-the-snow winter recreation restrictions. The management direction focuses on expansion of designated routes and play areas. None of the alternatives increase or change recreation developments or operations, or change existing designated routes or designated play areas. Alternatives 2, 3, 5 and 6 Modified are in compliance with the NRLMD, and the reduction of acres open for OSV travel in these alternatives result in fewer potential impacts to lynx or lynx habitat. Also please see the updated SEIS for additional information on lynx habitat connectivity and linkage areas.</p>
99-35a	<p><i>The scientific literature clearly shows that snowmobiles disturb lynx (Environmental Impacts from Snowmobile Use, pg 5, Bunnell et al,[2006], Murray, et al [2008] and Shenk [undated] and the ESA requires the Forest Service to ensure that its actions will not jeopardize the continued existence of listed species or result in the destruction or adverse modification of their critical habitat. In order to comply with the ESA and minimize OSV impacts on Canada lynx, the Forest Service must avoid lynx habitat when designating areas and trails for OSV use.</i></p> <p>Response: We were unable to identify which published research paper by Shenk was referenced. However, we have analyzed the impact of the OSV travel management action for areas and trails on lynx in terms of the Endangered Species Act and conclude that the action is not likely to adversely affect lynx. See Biological Assessment and Wildlife Report. This analysis included consideration of Bunnell (2006) and Murray (2008). There is no critical habitat for the Canada lynx on the BDNF. Please also see the response to comment 99-35.</p>
99-36	<p>Recommendations (from reviewer): <i>Spring grizzly bear habitat should close to OSV use starting April 15</i></p> <p>Response: This recommendation is considered in the SEIS.</p>
99-37	<p>Recommendations (from reviewer): <i>Wolverine denning habitat should be closed to OSV use</i></p> <p>Response: This recommendation is considered in the SEIS.</p>
99-38	<p><i>The draft SEIS states that forest specialists have been unable to identify any OSV-caused damage...in any area of the Beaverhead-Deerlodge (Draft SEIS at 92). Given that there is currently no monitoring plan in place...such impacts may be subtle and/or cumulative, we're are not surprised by this finding. We are surprised, however, to see that the draft SEIS doesn't put a monitoring plan in</i> <i>The draft SEIS states that forest specialists have been unable to identify any OSV-caused damage...in any area of the Beaverhead-Deerlodge (Draft SEIS at</i></p>

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	<p>92).</p> <p>Response: The monitoring plan is described in Chapter 5 of the Forest Plan and begins with explanations of reasons for Forest Plan level monitoring and evaluation and monitoring elements. Monitoring determines actual conditions and circumstances and compares them with assumptions and desired results Forest Plan monitoring is tightly focused on critical goals and objectives laid out in the plan (Forest Plan, pg 271). While recognizing potential effects from OSV use, especially during low snow conditions, the 2009 FEIS considered risks of effects to be low or immeasurable, except in very small locales best addressed at a site-specific project level (2009 FEIS, pg. 137 and 479). The assumption of low risk or immeasurable effects on soil, vegetation and aquatic resources from OSV use on the BDNF did not lead to a conclusion of critical goals and objectives necessitating formal monitoring.</p> <p>However, this does not mean monitoring of these resource simply does not occur. Rather, every time agency resource specialists are physically on-the-ground, they monitor resources through visual observations. To review the 2009 assumptions concerning effects to soil, water and vegetative resources from OSV use on the BDNF, ten agency resource specialists were asked to locate where OSV use – especially during low snow conditions- detrimentally affect soil, watershed and vegetation resources They were unable to identify any damage to the resources in any areas after numerous years after numerous years of observations (DSEIS, pg. 92). These specialists have a combined total exceeding 200 years of experience observing on-the-ground conditions on the BDNF. In addition, while several comment letters assume detrimental effects are occurring, more than 200 reviewers also did not identify any specific locations where detrimental impacts are located. If resources specialists or forest users begin observing impacts from OSV use during low snow conditions, site specific monitoring, including inventory and evaluation of those effects would be appropriate, at that time and at that location.</p> <p>Impacts from OSV use could be subtle and cumulative if this activity was new to the BDNF. However, OSV use has been a popular winter recreation activity on the BDNF since the mid-1960's. Potential impacts from repetitive low snow condition OSV use over a 50 year period is not apparent on any of the landscapes.</p>
99-39	<p><i>Indeed the draft SEIS references a handful of studies pointing to the potential long-term impacts of OSV use on soils, watersheds, and vegetation (Draft SEIS pages 93-95). There are many published studies detailing these impacts and we request that the Forest Service incorporate these studies into the analysis as well. An overview of relevant studies can be found in the Winter Wildlands Alliance documents Environmental Impacts from Snowmobile Use and Snowmobile Best Management Practices for Forest Service Travel Planning. ...the Beaverhead Deerlodge must consider these impacts when designation</i></p>

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	<p><i>routes and areas of OSV use. There is no evidence in the draft SEIS that the Forest Service has applied the minimization criteria to these designations, instead, the draft SEIS appears to be an attempt to justify the existing management rather than any sort of substantive effort to comply with the Court order [sic].</i></p> <p>Response: Please refer to responses to comments 99-17 and 100-1.</p>
99-40	<p><i>A recent University of Montana study estimates that, in Montana, snowmobiles burn an estimated 4.3 million gallons of gasoline each season (UM, 2013). Given that the vast majority of snowmobiles used on Forest Service lands have 2-stroke engines, and that 2-stroke engines are notoriously inefficient, we can estimate that hundreds thousands of gallons of unburned fuel are deposited directly onto Montana’s snowpack each year. Unburned fuel contains many toxic compounds including benzene...which then accumulate into the snowpack (OSV BMPs at 12). Spring runoff discharges these accumulated pollutants as a pulse into the soil, groundwater, and surrounding waterbodies (Id.). While it’s difficult to document these impacts through casual observation alone, when one actually looks for impacts they find them. ...highly toxic and persistent polycyclic aromatic hydrocarbons (PAHs) had increased two to six times the background level in a nearby stream (McDaniel, 2013).</i></p> <p>Response: The Draft SEIS disclosed potential impacts on water quality from OSV emissions based on several published, scientific articles (including McDaniel, 2013 a graduate dissertation) and monitoring conducted in Yellowstone National Park where daily OSV use greatly exceeds levels on the BDNF. The Final SEIS has been updated with the published research from McDaniel cited as McDaniel and Zielinska (2015). McDaniel and Zielinska (2015) details a study of the Blackwood Canyon in the Tahoe Basin area which was chosen because of its popularity with snowmobilers. The study notes that a single outfitter-guide operator in the area provided snowmobile tours to over 9,750 visitors annually. The study distinguished between different levels of snowmobile use finding that heavy polycyclic aromatic hydrocarbons (PAHs) were significantly greater in snow samples from areas with greater than 50% coverage by snowmobile tracks. The study found that PHA loading in the snowpack was proportional to the level of snowmobile activity at and adjacent to the sampling site. Snowmobiling on the BDNF simply does not occur in the concentrations similar to the Tahoe Basin and water quality effects can’t be compared. The UM Study (2013) is an economic study of state-wide assessment it does not discuss the resource impacts nor does it speak to the use levels on the BDNF.</p>
99-41	<p><i>Montana Fish, Wildlife, and Parks has previously raised concerns about OSV impacts to water quality on the Beaverhead-Deerlodge. ...the Department stated “Special note should be made that the frozen surface of Cottonwood Lake is intensively used by snowmobiles, and that approximately 30% of all fuel</i></p>

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	<p><i>passes through two-stroke engines, thus emitting the photo toxic compounds MTBE and PAH into Thunderbolt Creek-a Westslope cutthroat trout stream”.</i></p> <p>Response: Cottonwood Lake is located along Thunderbolt Creek in the Boulder River Landscape. The area surrounding Thunderbolt Creek and Cottonwood Lake is open to OSV use in Alternatives 1, 2 and 4 and closed in Alternatives 3, 5 and 6 Modified. Alternative 6 Modified designates an OSV route along Thunderbolt Creek upstream to Cottonwood Lake. Effects of OSV emissions and potential water contamination along this route, including Cottonwood Lake are disclosed in the 2012 FSEIS (pgs. 5-8 and 55-56).</p>
99-42	<p><i>This draft SEIS does not mention how OSV routes along Thunderbolt Creek or an open area that includes Cottonwood Lake would impact Westslope cutthroat trout or water quality. At least one route travels along Thunderbolt Creek within the riparian zone, but the draft SEIS does not discuss how this route was selected to minimize impacts. ...does not discuss routes in Antelope Basin or Antone Cabin areas that run along riparian areas. ...concentrated snowmobile use on designated routes near tributaries and creeks along Road #056 (including Poison and Anthill Creeks), as well as along Road #325 (Robb Creek and S. Fork-Blacktail Deer Creek). ...SEIS doesn’t discuss any cumulative impacts to water quality anywhere on the forest from current and possible increases in OHV use as a result of the route designations. ...draft SEIS ignores potential impacts and certainly does not minimize the impacts of these and other OSV routes on water quality.</i></p> <p>Response: Effects of designating OSV routes to Antone Cabin (Road #325), along Road #056 and Thunderbolt Creek are disclosed in the 2012 FSEIS. The stream along Road #325 is the South Fork of the West Fork of Blacktail Deer Creek. Robb Creek is not located along Road #325 and closed to OSV use in all alternatives.</p> <p>In all alternatives, groomed or marked snowmobile trails are located in areas designated open for OSV use. Potential water quality impacts are disclosed in the SEIS (DSEIS, pg. 93-94). Current and potential impacts resulting from existing or possible future increases in OSV use on the BDNF are not expected to approach or exceed the levels measured by Arnold and Koel (2006) in Yellowstone National Park.</p>
99-43	<p><i>Given the amount of fuel that snowmobile use in Montana consume substantial source of emissions with negative impacts on air quality. This impact is specifically documented on Forest Service lands in a study on the Medicine-Bow National forest. Musselman and Korfmancher [sic] (2007) documented a decline in air quality with increased snowmobile activity (Musselman, R.C. and J.L. Kormacher.2007). They measured higher ambient concentrations of CO₂, NO_x, NO and NO₂ at a snowmobile staging site and found significantly higher concentrations of these air pollutants on days with significantly more snowmobile activity concluded that snowmobile exhaust was degrading air</i></p>

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	<p><i>quality.</i></p> <p>Response: We have reviewed Musselman and Korfmacher (2007) and updated the FSEIS with their findings. Musselman and Korfmacher found significant differences in air quality at a snowmobile staging area in Wyoming during higher use periods (weekends) than lower use periods (weekdays) and seasonal differences (winter versus summer). However, Musselman and Korfmacher concluded that “...air pollution concentrations were generally low both winter and summer, and were considerably lower than exceedance levels of NAAQS” and “...pollutant concentrations were low and not likely to cause significant air quality impacts even at this high snowmobile activity site.”</p>
99-44	<p><i>Snowmobiles impact vegetation...crushing and breaking vegetation, or through a number of indirect mechanisms. ...off trail...often run over trees and shrubs causing damage or death-often with minimal snowmobile traffic. Although these impacts may not be environmentally significant when they occur in robust forest environments, they can be very significant when they occur in sensitive forest habitat, such as high mountain slopes or meadows. In addition these impacts tend to be cumulative and may take several years of monitoring before their effects are apparent.</i></p> <p>Response: Please see response to comment 99-38.</p>
99-45	<p><i>For example, a 2009 study on the Gallatin National Forest found 366 acres of tress damaged by snowmobiles on timber sale units-slowng forest regeneration (Winter Wildlands Alliance, 2009). Trees such as white-bark pine (Pinus albicaulis), found only at high elevations and declining across it range, may be vulnerable to snowmobile damage. Trampling has also been found to result in a reduction in plant productivity, changes in the plant community, and a reduction in plant diversity (Stangl, J.T., 1999, pg 119-121 in Oliff, et al, 1999).</i></p> <p>Response: We have reviewed Winter Wildlands Alliance (2009) which recognizes OSV damage occurring In previously logged stands on the Gallatin National Forest, specifically broken tree tops. The SEIS also recognizes this type of vegetative damage occurs on the BDNF (DSEIS beginning at pg. 94). Broken tree tops result from a variety of causes, including being run over by vehicles, trampling, browsing or rubbing by animals (especially antlered animals shedding velvet), high winds and falling overstory trees and branches. While the Gallatin National Forest surveys noted damage from OSV use on 0.5% of the surveyed acres, Winter Wildlands Alliance (1999) does not specify if OSV use was the only source of damage on these acres nor if the damage resulted in failed regeneration of the stands. Broken tree tops or branches does not automatically lead to tree mortality or failed stand regeneration. On the BDNF, OSVs occasionally break tree branches in tops, However, the impact is rare and, after numerous years of visual observation, we are unable to identify any areas where damage, attributable to OSV use is discernible.</p>
99-46	<p><i>Snow compaction from OSV activity reduces the insulating air spaces and</i></p>

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	<p><i>conducts cold air to the ground. These lower temperatures can reduce plant density and composition, reduce productivity and growth, delay seed germination and flowering, as well as affection decomposition rates, hummus formation and microbial activity (Davenport, J., and T. A. Switalksi. 2006). These impacts ultimately can change community structure and reduce the availability and duration of spring wildlife foods (Stagl, J.T. 1999, pg. 119-121 in Oliff, et al, 1999).</i></p> <p>Response: The OSV effects attributed to Davenport and Switlaksi (2006) in this comment are based on research documented by Neumann and Merriam (1972) in the general vicinity of Ottawa, Ontario, a substantially larger metropolitan area than currently exists in Southwest Montana. The potential impacts identified in Neumann and Merriam (1972) and Stagl (1999) are disclosed in the SEIS (DSEIS, pg. 95). As stated in Neumann and Merriam (1972) these effects have the potential to severely damage or eliminate small plots of specific vegetative types and where preservation of such vegetation is desired, snowmobile trails should be prohibited. The Forest Plan provides management direction for the 3.38 million acre BDNF. While these small plots of damaged vegetation may exist, we are unable to identify areas where such vegetation is so sensitive or rare it needs preserved by prohibiting OSV use.</p>
99-47	<p><i>...OSVs impact air and water quality and the Forest Service must designate routes and areas in a manner that minimizes these impacts. ...avoid designation trails in areas with important, sensitive or impaired resources and should not designate areas with these resources as open to OSVs unless the impacts of motorized recreation can be minimized (OSV BMPs at14). These areas may include water bodies, wetlands, riparian areas, meadow, and alpine habitat.</i></p> <p>Response: The SEIS analyzes the impacts of OSV use in terms of water quality and air quality. As was found in the 2009 FEIS overall emissions from OSV use are unlikely to exceed national Ambient Air Quality or Montana Air Quality Standards since these standards have not been exceed in the West Yellowstone area where OSV use is much heavier. Also, no evidence has shown that water quality has been an issue with OSV use. It has also not been shown to be an issue in Yellowstone National Park where OSV use is in greater concentrations. In the winter, OSV water crossings are occurring in frozen conditions. We are not finding impacts relative to this issue as open water, if it exists, is avoided by snowmobiles. Further, most used OSV routes on the BDNF largely follow existing roads and trails which are maintained to minimize impacts. The one riparian area where impacts have been identified is the West Fork of the Madison. Please see response to comment 100-24.</p>
99-48	<p><i>We recommend that the Forest Service prohibit OSV use on lakes or reservoirs that provide municipal drinking water.</i></p> <p>Response: None of the municipal watershed on the BDNF are closed to OSV</p>

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	use specifically to protect water quality because water quality is not being degraded below Montana state drinking water standards due to vehicle emissions.
s99-49	<p><i>The Forest Service should avoid designating trails with uncontrolled water crossings and should locate trails to avoid major water bodies. Understanding that many OSV trails follow the existing road network and that a re-route may not be feasible, the Forest Service could mitigate impacts by maintaining bridges and culverts to prevent erosion during spring run-off and monitor routes and areas to ensure the measures taken effectively mitigate impacts to water quality, soils, and vegetation.</i></p> <p>Recommendation (from reviewer): <i>Avoid designating trails with uncontrolled water crossings and locate trails to avoid major water bodies.</i></p> <p>Response: The reviewer is correct that groomed OSV trails most often are located along roads are trails which are designed and maintained to minimize impacts. In the winter, in places where there is no bridge, OSV water crossings are occurring in frozen conditions. We are not finding impacts relative to this issue as open water, if it exists, is avoided by snowmobiles.</p>
99-50	<p><i>Instituting a minimum snow depth requirement is a management tool the Forest Service should employ to minimize impacts to soils and vegetation. While snow can buffer the OSV impacts, there must be adequate snow on the ground for this to happen. Even in the midst of winter, snowmobile impacts can be of concern on windswept ridges, big game winter range, and other areas of low snowpack. Therefore, it's crucial that the Forest Service designate OSV areas to avoid these low-snow areas and institute a minimum snow depth restriction. Requiring 18 inches of uncompacted snow before allowing OSV use within an area will help to minimize OSV impacts related to soil compaction, damage to wetland and alpine habitats, and protect vegetation and subnivean habitat. The best available sciences shows that minimum snow depths should be at least 18 inches for cross-country travel and 12 inches for travel on groomed trails or roads (OSV BMPs at 14). A snow depth restriction should be paired with a plan to monitor and enforce minimum snow depth restrictions, including implementing emergency closures when snowpack falls below the relevant thresholds (Tongass NF MVUMs and Chugach NF Emergency Order)...the Forest Service's own Best Management Practices for water quality management call for forests to institute minimum snow depth for each type or class of over-snow vehicle to protect underlying resources as part of any restrictions or prohibitions on over snow use (USFS 2012).</i></p> <p>Recommendation (from reviewer): <i>Implement an 18 inch minimum snow depth</i></p> <p>Response: The Chugach and Tongass National Forests are located in southern Alaska (Kenai Peninsula and Anchorage vicinity) and the Alaskan Panhandle. Snow conditions on both Forests are heavily influenced by heavy, wet snow events from a maritime weather pattern. The BDNF is located in the Northern</p>

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	<p>Rockies in Montana frequented by fluffy, dry snow conditions. Differences in the degree of impacts to soils from OSV use in low snow areas analysis between these different climates naturally differ. Please refer to responses to comments 99-14, 100-56 and 100-93.</p> <p>Emergency closures, such as the one mentioned in this comment for the Chugach National Forest, can be implemented at any time in response to unforeseen, sudden changes in conditions.</p> <p>USFS (2012) describes a national Best Management Practice (BMP) program to provide uniform direction, monitoring and reporting processes for BMP implementation and effectiveness. The document also provides National Core BMPs. The objective for BMP Rec-7 (USFS, 2012, pg. 96) is “Avoid, minimize, or mitigate adverse effects to soil, water quality and riparian resources from over-snow-vehicle use” and identifies 9 practices, including a minimum snow depth (the practices does not specify a depth of 18 inches). USFS (2012) specifically states “Each BMP in this document has a list of recommended practices that should be used, as appropriate or when required, to meet the objectives of the BMP. Not all recommended practices will be applicable in all settings...” (USFS, 2012, pg. 12). Please refer to the SEIS for information about impacts from OSVs to soil and water quality within the context and extent those impacts are occurring on the BDNF.</p>
99-51	<p><i>Defining a minimum snow depth will also help the winter travel plan be adaptive in the face of climate change. The snow season is changing and having flexibility built into the plan is key for ensuring that the impact of wither motorized use is minimized regardless of when that use occurs.</i></p> <p>Response: The monitoring and closure ability under the travel management rule designation process gives the tools necessary to deal with future conditions and use. 36 C.F.R. 212.50 et. seq.</p>
99-52	<p><i>We also believe it is important to set seasonal “bookends” before and after which OSV user is not allowed. This is another action recommended by Best Management Practices determined by the Forest Service: “Specify season of use to be at times when the snowpack is expected to be of suitable depth conditions (USFS 2012, BMP for Water Quality Management).</i></p> <p>Response: As proposed in all alternatives, OSV use would be designated December 2nd through May 15.</p>
99-53	<p><i>Currently the Beaverhead Deerlodge National Forest designates 1.3 times as many acres of the forest open to OSV use, despite there being 7.2 times more annual cross-country ski and snowshoe visits as compared to snowmobile visits (Winter Wildlands Alliance, 2015, June 2015, pages 12-13). The existing designations, skewed in favor of OSV use despite the greater number of non-motorized recreational forest users, does nothing to minimize conflicts among those uses. This disparity is made even worse considering that OSV users consistently trespass into non-motorized areas, further disturbing and</i></p>

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	<p><i>displacing skiers and snowshoers.</i></p> <p>Response: The agency has analyzed the issue of conflict in the 2009 FEIS and in this SEIS. Please see the sections of the SEIS on “Motor Vehicle Use and Existing or Proposed Recreational Uses of National Forest System Lands or Neighboring Federal Lands” and “Different Classes of Motor Vehicle Use of National Forest System Lands or Neighboring Federal Lands.” In response to the issue of incursions please see response to comments 25-1 (Mt. Jefferson) and 100-12 (other recommended wilderness areas and wilderness areas).</p>
99-54	<p><i>As noted in the draft SEIS, conflict between OSV use and other recreational uses is highest in the Mt Jefferson area. The 2009 Forest Plan attempted to resolve this historic conflict by closing a portion of the area to protect wolverine habitat, wilderness values, and non-motorized recreation opportunities. However, annual monitoring (occurring since 2001) has documented consistent motorized intrusions into the closure area. The 2009 ROD states that if monitoring reveals non-compliance to be an issue then the decision to allow snowmobiling on Mt Jefferson will be re-evaluated. We have ample evidence to show that non-compliance is an ongoing problem-as documented in the draft SEIS as well as many years’ of monitoring report-and now is the time for the Forest Service to take action (Draft SEIS at 156). To minimize conflicts between uses in the Gravelly Landscape the Beaverhead-Deerlodge must amend the Forest Plan to prohibit OSV use on Mt Jefferson.</i></p> <p>Recommendation (from reviewer): <i>Close Mt. Jefferson to OSV use.</i></p> <p>Response: Alternatives 2, 3 and 5 consider closing all BDNF lands in the Mt. Jefferson area. Alternative 6 Modified considers a compromise closing the north section of the BDNF portion of Mt Jefferson to OSVs and continuing OSV use in the south section. Under Alternative 6 Modified, since 2010 the north section has been closed to OSV use as a recommended wilderness area while the south section has remained open. The SEIS discloses the use conflict which has occurred due to illegal incursions of snowmobiles into the recommended wilderness area portion. The SEIS also discusses the efforts which have been undertaken and the new efforts underway to reduce non-compliance and use conflict. Please see the SEIS and response to comment 25-1 and 99-48.</p>
99-55	<p><i>The draft SEIS also discusses an area of potential conflict around the Chief Joseph cross-country ski trail (Draft SEIS at 156). While conflict has been avoided thus far with a verbal agreement between users, the Forest Service should formalize this agreement in the travel plan. Doing so will help prevent future conflict as new users, and uses emerge on the landscape.</i></p> <p>Recommendation (from reviewer): <i>Formally close the area surrounding the Chief Joseph cross-country ski trails to OSV use.</i></p> <p>Response: The DEIS does discuss that Chief Joseph Pass is an area of potential conflict between cross-country skiing and snowmobile use. However, as the reviewer notes that efforts have been undertaken to avoid this potential</p>

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	<p>conflict and Chief Joseph Pass is an example where cooperation has resulted in avoiding and mitigating use conflict. The BDNF believes that closure of areas is not the only solution to avoiding conflict. Please see DSEIS pg. 156-157 and response to comments 199-3 and 100-88.</p>
99-56	<p><i>The Forest Service should classify all tracked vehicles as “over-snow vehicles” and prohibit their use outside of the designated system of routes and areas, and when there is less than 18 inches of snow. Tracked OHVs don’t have skis therefore can travel in low snow conditions without causing any damage to the vehicle. ...tracked OHV use is not uncommon in areas with little to no snow...While tracked OHVs may present little impact on groomed trails or n deep snow, they can cause significant damage in areas that are open to winter motorized use that don’t get enough snow for a vehicle with skis. Indeed, the draft SEIS even specifies that tracked ATV use is growing in low snow areas (Draft SEIS at 164).</i></p> <p>Recommendation (from reviewer): <i>Classify all tracked vehicles as OSVs.</i></p> <p>Response: An OSV is a motor vehicle designed for use over snow that runs on a track or tracks and/or a ski or skis, while in use over snow (36 CFR § 212.1). Not all tracked vehicles are designed for use over the snow, but if they are, they are already classified as an OSV. Please refer to responses to comments 99-17 and 99-50. The SEIS discloses the effects looking at the area (acreage) open to OSVs including relying on on-the-ground field expertise of a variety of agency scientists (soil scientists, fisheries biologists, recreation managers, silviculturist and rangeland management specialists) who, through decades of observation on the BDNF, have not observed these effects at a noticeable, or discernable level. We are not aware of large use of tracked ATVs or that they are causing “significant damage.” The monitoring and closure ability under the travel management rule designation process gives the tools necessary to deal with future conditions and use. 36 C.F.R. 212.50 et. seq.</p>
99-57	<p><i>Instituting a minimum snow depth of 18 inches for cross-country travel will protect forest resources from OSV use, whether the OSV is a tracked OHV, a snowmobile, a snow-bike, or some future unanticipated over-snow vehicle.</i></p> <p>Response: OSV use on the BDNF in the presence of inadequate snow cover is not occurring to the extent we can geographically identify locations where there are impacts. The effects are negligible at best with any site-specific disturbance to vegetation unable to be detected after the snowmobile season.</p>
99-58	<p><i>We also ask that the Forest Service recognize the difference between wheeled motor vehicles and wheeled mechanized vehicles. Fat bikes were rare to non-existent in Montana in 2006 and were unintentionally included in this prohibition. We encourage the Beaverhead-Deerlodge to learn from this situation and specifically allow fat bikes on groomed snowmobile trails.</i></p> <p>Recommendation (from reviewer): <i>Allow fat bikes on groomed snowmobile trails</i></p>

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	<p>Response: With the exception of designated wilderness and recommended wilderness areas, wheeled mechanized (but non-motorized) vehicles, including fat tire bicycles designed for over snow travel are allowed on the BDNF. Fat-tire bicycles are not an OSV as defined in regulation. 36 C.F.R. 212.1.</p>
99-59	<p><i>The analysis in the draft SEIS underestimates future recreational pressures...recreational visits to the forest will likely increase over the life of the plan. Across the west there are more snowmobilers, backcountry skiers, cross-country skiers, and snowshoers than ever before and with this increase in use there is the potential for increased conflict. Winter travel plans that designate areas for motorized and non-motorized use help to alleviate this conflict and provide certainty for forest visitors.</i></p> <p>Response: The 2009 FEIS includes discussion of recreational use, growth, and potential for conflict and additional information is also included in this SEIS. Please also see response to comment 99-15. We agree that the designation of areas open and closed to OSV use help to alleviate conflict and the Forest Plan allocations were intended to do so by allowing visitors to know what to expect in each area.</p>
99-60	<p><i>...the forest’s current OSV management plan fails to anticipate new technologies. In many parts of the planning area the Forest Service assumes that thick timber will limit OSV use to designated routes.</i></p> <p>Response: The SEIS has been updated to include additional discussion about advances in OSV technology.</p>
99-61	<p><i>For example, in the Upper Clark Fork Landscape the draft SEIS explains that there is regular use between American Gulch and Olsen Gulch but that thick timber prevents snowmobiles from leaving the trail and therefore there are no cross-country travel impacts to big game (Draft SEIS at 85). This statement fails to account for snow-bikes, which can nimbly navigate through the trees. Areas that were once considered too thickly timbered to allow for OSV use are open to those riding snow-bikes and this has greatly increased the footprint of motorized use across the forest. Snow-bikes are just the most recent examples of a new technology that has changed how motorized users recreate on the forest.</i></p> <p>Response: The SEIS has been updated to include additional discussion about advances in OSV technology; including snow bikes. However, use of snow bikes (created by an after-market kit that allows dirt bikes to be converted to include a ski on the front and a track on the rear) are minimally used on the BDNF.</p>
99-62	<p><i>Rather than assume that low snow, vegetation, or topography will naturally restrict OSV use across the forest, the Forest Service must be proactive in designation routes and areas for OSV use. We cannot predict what the next 5, 10, or 20 years will bring...Rather than leave vast areas of the forest open to OSV use the new plan should focus OSV use in those areas where it makes the</i></p>

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	<p><i>most sense-where there is ample snow and limited conflict-and manage the rest of the forest for other uses.</i></p> <p>Recommendation (from reviewer): <i>Focus OSV use designations in areas that consistently receive sufficient snow and where OSV use currently occurs.</i></p> <p>Response: Thank you for your recommendation. The SFEIS analyzes the effects of OSV use in each landscape and site-specifically.</p>
100-1	<p><i>The Council on Environmental Quality’s (CEQ) regulation implementing NEPA explains that the statement of purpose and need “shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” 40 C.F.R. § 1502.13. An accurate statement of purpose and need is central to crafting an adequate EIS because it will provide the guideposts for the analysis of the proposed action, alternatives, and effects. 40 C.F.R. § 1502.13. Here, the Forest Service states “[t]he purpose of this supplement is to comply with the August 27, 2015 US District Court for the District of Montana Order by disclosing potential snowmobile impacts on big game wildlife and applying the minimization criteria in the 2005 Travel Management Rule.” SEIS at 6. It states the “SEIS evaluates information underlying the analysis of snowmobile impacts on big game wildlife and resources cited in the minimization criteria.” <i>Id.</i> Based on the evaluation of impacts, the BDNF Supervisor “will consider the analysis in the SEIS, public comment, apply the minimization criteria to areas remaining open to OSV use and determine whether an amendment to Forest Plan direction is needed.” <i>Id.</i> While compliance with Judge Molloy’s order is and should be a driving factor for the SEIS, the Forest Service’s statement of purpose and need must also reflect the agency’s underlying substantive duties. Here, the statement of purpose and need ignores the agency’s duty to not only consider, but also apply the minimization criteria with the objective of minimizing impacts. It also confuses the Forest Service’s duty to apply a “closed unless designated open” approach when designating OSV routes and areas...The Forest Service has a substantive duty to consider and apply the minimization criteria when designating OSV routes and areas on the BDNF. 36 C.F.R. §§ 212.51(a)(3), 212.55(b)...the Forest Service’s statement of purpose and need should reflect the agency’s duty to apply the minimization criteria when designating OSV routes and areas on the BDNF with the objective of minimizing impacts. As written, the Forest Service’s statement of purpose and need appears to improperly defer application of the minimization criteria until after the SEIS and public comment.</i></p> <p>Response: The 2009 Revised Forest Plan considered a range of alternatives from the existing condition. Prior to Forest Plan Revision 83% of the BDNF general big game winter range was open to winter motorized travel under the existing condition. Every alternative to the existing condition (except for alternative 4) reduced potential effects from OSV use by allocating fewer areas</p>

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	<p>as open to OSV use. The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in the designing of the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-2	<p><i>The Ninth Circuit stated, “mere consideration of the TMR’s minimization criteria is not sufficient to comply with the regulation.” WildEarth Guardians, 790 F.3d at 932 (9th Cir. 2015). Rather, “the Forest Service is under an ‘affirmative obligation...to actually show that it aimed to minimize environmental damage when designating trails and areas.’” Id. (internal citations omitted). This direction requires much more than a revised justification for the existing area and route designations, which is what the Forest Service has drafted in this SEIS. The Forest Service should revise its statement of purpose and need to be consistent with the case law. The purpose should include a need to show how the Forest Service designated the OSV routes and areas in the various alternatives with the objective of minimizing impacts to the minimization criteria.</i></p> <p>Response: Please refer to the response to comment 100-1.</p>
100-3	<p><i>By regulation, for each national forest unit with adequate snowfall, the Forest Service must designate and display on a map areas and routes where OSV use is permitted. 36 C.F.R. §§ 212.80(a), 212.81(a). OSV use outside of the designated system is prohibited. Id. § 261.14. Therefore, forests are supposed to apply a “closed unless designated open” approach to OSV designations. See, e.g., 80 Fed. Reg. 4500, 4507 (Jan. 28, 2015) (concluding that “it would be clearer for the public and would enhance consistency in travel management planning and decision-making if the Responsible Official were required to designate a system of routes and areas where OSV use is prohibited unless allowed” (ie., marked open on a map)... The Forest Service’s description of its proposed actions in this and previous environmental analyses of the LMP conflicts with the plain language of its own rules. See, e.g., SEIS at 8 (“The ‘action’ (changed condition) proposed in the 2009 FEIS alternatives was to close areas, hence, analysis in the 2009 FEIS disclosed the effects of closing additional areas to OSV use, not opening areas... Consistent with a “closed unless designated open” approach, the Forest Service should re-characterize its proposed actions as designating OSV routes and areas as “open.” All other parts of the forest are, by default, closed to OSV use.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in the designing of the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-4	<p><i>The SEIS should include an alternative under which no areas or routes would be</i></p>

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	<p><i>designated as open to recreational OSV use, or at least an alternative that considers a scenario where a majority of the forest is designated closed to OSV use. This alternative is necessary to provide an accurate comparison for analysis of the impacts associated with all of the area and route designations made in this LMP revision—including those allowing continued OSV travel in existing areas or on existing routes. Unlike in a typical NEPA analysis where the no action alternative provides the baseline for comparison, the no action alternative for most winter travel planning efforts reflects a current management status quo that is illegal according to the Forest Service’s own regulations applying a closed unless designated open regime. Here an alternative that designates no areas or routes to OSV use is necessary to facilitate a fully informed decision about the impacts of each action alternative.</i></p> <p>Response: The purpose and need of this project is to adequately supplement the environmental impact statement for the 2009 Forest Plan. The final OSV rule’s prohibition on OSV use off the designated system (§ 261.14) goes into effect on an administrative unit or a Ranger District once that unit or District has designated those NFS roads, NFS trails, and areas on NFS lands that are for OSV use and an OSV use map identifying those roads, trails, and areas (§ 212.81(c)) is made available. Until designations for a unit or District are complete and an OSV use map identifying those designations is published, existing OSV travel management policies, restrictions, and orders remain in effect. This is the condition that exists if no action were to be taken. We discuss consideration of the recommendation for no OSV use on the BDNF in the FSEIS.</p>
100-5	<p><i>The Forest Service should also consider an alternative that limits OSV use to designated routes, as opposed to areas.</i></p> <p>Response: We discuss consideration of the recommendation for limiting OSV use to designated routes only on the BDNF in the FSEIS. Please refer to the response to comment 100-4.</p>
100-6	<p><i>Consistently throughout the SEIS, the Forest Service relies on the lack of direct evidence of impacts to conclude no OSV impacts exist on the BDNF. See, e.g., SEIS at 53 (“Although disturbance is possible, MFWP biologists queried, did not identify instances where winter motorized travel is affecting any of the mountain goat populations on the BDNF”); 95 (“on the BDNF this [damage from OSV use] has not been observed”). The agency asks for “evidence of particular areas within the landscapes where there is a noticeable impact on resources resulting in damage to soil, watershed, vegetation or other resources; harassment or substantial disruption to wildlife; or conflict among uses.” SEIS at Abstract. This approach impermissibly downplays the impacts of OSV use. The relevant legal requirement under NEPA is not limited to analyzing noticeable impacts. 42 U.S.C. § 4332(2)(C)(i)-(v)...The Forest Service has a duty to disclose any direct, indirect or cumulative effects, whether beneficial or detrimental,</i></p>

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	<p><i>that will or may have an effect on the environment. Thus, the scope of the Forest Service’s SEIS analysis must be much broader than just “noticeable” impacts. Even where the Forest Service has failed to observe OSV damage on the BDNF, it does not follow that there are no impacts.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on big game and resources subject to the minimization criteria. The methodology for our analysis began with literature review to determine potential effects of OSV. We then undertook review of on-the-ground effects of OSV use, including obtaining information from each MFWP specialist. And, we asked for specific information from the public. The information and data obtained shows negligible, if any, effects on resources. The statement that <i>“Even where the Forest Service has failed to observe OSV damage on the BDNF, it does not follow that there are no impacts.”</i> provides no evidence of impacts and would require speculation of impacts.</p>
100-7	<p><i>Choosing not to look for impacts cannot prevent the Forest Service from discussing the impacts that are likely occurring. This is especially true where the best available science shows direct, indirect, and cumulative impacts likely do result from OSV use....See Winter Wildlands Alliance, Snowmobile Best Management Practices for Forest Service Travel Planning: A Comprehensive Literature Review and Recommendations for Management (Dec. 2014)... See also Mullet, T.C., Effects of Snowmobile Noise and Activity on a Boreal Ecosystem in Southcentral Alaska (Nov. 2014) (Attachment B). The Forest Service must consider these studies when analyzing the direct, indirect, and cumulative impacts of OSV use on the BDNF.</i></p> <p>Response: We reviewed Winter Wildlands Alliance (WWA), 2014. Both WWA and this reviewer frequently reference WWA’s literature review with concerns about specific minimization criteria. We respond to these specific comments as they are individually raised. We have also reviewed Mullet, 2014. Mullet, 2014 is a graduate thesis based on research in southcentral Alaska on the Kenai National Wildlife Refuge in a subarctic region where the Alaska National Interest Lands Conservation Act allows for snowmobiling in wilderness areas. In the SEIS, we considered and disclosed the more relevant study of potential impacts of noise based on acoustic modeling in Yellowstone National Park due to the close proximity and similar weather, terrain and vegetation patterns that exist on the BDNF.</p>
100-8	<p><i>The Forest Service should also provide for public review and consider in the SEIS the results of any monitoring required by the 2009 LMP. For example, the BDNF LMP selected wolverine and mountain goats as management indicator species (MIS) “to help assess management of high elevation snowmobile use.” 2009 Corrected FEIS at 489...But the analysis in the SEIS does not refer to any data resulting from monitoring between 2009 and 2015. Instead, the SEIS states that the Forest Service relied on the Montana Natural Heritage Program (MTNHP),</i></p>

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	<p><i>Forest wildlife sighting database information, Appendix B of the 2009 FEIS and species distribution information from MFWP. Consistent with CEQ’s implementing regulations, the Forest Service must provide this underlying monitoring data.</i></p> <p>Response: The SEIS does include the monitoring data from the data sources identified in Chapter 5 Monitoring and Evaluation plan of the 2009 Forest Plan. Specifically, in reference to wolverines, the one of the performance measure and data sources in the 2009 Forest Plan monitoring plan states that data can come from MFWP and partners. The Forest Plan monitoring reports are included in the record. There have been no wolverine specific surveys in the Mt. Jefferson area recently. In reference to mountain goats, these populations are monitored by MFWP biologists. Mountain goat population data from MFWP can be found in the project file. The mountain goat section has been updated based on landscape level, site-specific observations from local MFWP biologists. Additionally please see the response to comment 25-1 for monitoring specific to Mt. Jefferson.</p>
100-9	<p><i>OSV use can have significant adverse impacts on wildlife by increasing stress at a time when animals are highly vulnerable, facilitating competition, causing displacement and avoidance, and effectively reducing the amount of available habitat because species avoid motorized vehicles. 2009 Corrected FEIS at 509. See also Attachment A at 9-12.... Impacts of winter motorized use can be significant, especially where specific routes travel through lynx, mountain goat, and wolverine habitats, as well as big game winter range. Neumann and Merriam (1972) showed that snowmobile use in Ontario caused significant changes in snow structure and, subsequently, wildlife behavior. See also Attachment B. The SEIS must clearly disclose how the winter motorized use restrictions proposed in each alternative will affect wildlife, wildlife habitat, and solitude. Based on this information, the Forest Service must show how it located OSV route and area designations to minimize those impacts.</i></p> <p>Response: The 2009 FEIS page 509 states, “Motorized winter recreation can adversely affect wildlife by causing them to move away when demands on their energy reserves are highest.” The reviewer assumes the effects are significant but this was not stated in that document. The DSEIS disclosed the effects to wildlife and wildlife habitat (Big Game Winter Range, grizzly bears, Canada lynx, gray wolf, and wolverine) from OSV use forestwide and by Landscape. The big game, grizzly bear, Canada lynx and wolverine sections have been updated in the FSEIS to include additional information and research. In almost all Landscapes, potential effects to individuals were acknowledged but the effects analysis did not show threats to any populations on the Forest from OSV travel. Attachments A discuss possible effects not specific to the BDNF. Attachment B is a master’s thesis using much the same research considered in this SEIS showing that snowmobiles move animals and can cause stress to individuals.</p>

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	<p>The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in the designing of the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-10	<p><i>The Forest Service recognizes that OSV use impacts grizzly bears, based in large part on two biological assessments for the LMP. See SEIS at 97-98. Yet the agency improperly discounts OSV impacts to grizzly bears outside of the grizzly bear recovery zones, stating that the Recovery Plan acknowledged a higher level of impacts in that area. SEIS at 98-99. This disingenuously presents the impacts to the public. Regardless of the Recovery Plan or management direction, the Forest Service must identify, disclose, and minimize the impacts of OSV use on grizzly bears across the entire forest, even outside of wilderness or recommended wilderness. The fact that grizzly bear populations have grown and expanded outside of primary conservation areas identified in the Recovery Plan does not support that OSV use has no impact on these grizzly bear populations. SEIS at 99. Rather, the Forest Service should recognize that OSV use is more likely to have an impact on the grizzly bear populations outside of these conservation area.</i></p> <p>Response: The Draft SEIS analyzed grizzly bear denning habitat and the potential for disturbance across the entire forest (by landscape and by alternative), including areas inside and outside wilderness and recovery areas. Please see the DSEIS grizzly bear section starting on page 97. The effects section for grizzly bears in the FSEIS has been updated to incorporate additional information. Additionally please see responses to comments 99-10 and 99-29.</p>
100-11	<p><i>Grizzly bears can be susceptible to disturbance and risk den abandonment. SEIS at 89; Attachment A at 9. The risk is especially high from late February through April. SEIS at 89. The Forest Service should consider the impacts of OSV use in den areas during these times of the year, and how that use may directly, indirectly, or in the cumulative impact grizzly bears.</i></p> <p>Response: Page 98 of the SEIS explains that the impact of concern to grizzly bears is to females with cubs. (Page 89 in the SEIS discusses bighorn sheep). The Forest Plan Biological Opinion discusses that the potential interaction between OSV use and females and cubs is between third week of March and May 15. Such interaction would be limited due to low number of denning bears and the abundant amount of denning habitat. Thus, the likelihood of interaction is very low. See the Biological Opinion. Please see the response to comments 99-10, 99-29 and 100-10.</p>
100-12	<p><i>The SEIS states that there are no OSV impacts to grizzly bears denning or emerging from dens in any wilderness or recommended wilderness areas on the BDNF. SEIS at 98 (“There are no anticipated effects from winter motorized use to grizzly bears denning or emerging from their dens in” the Lee Metcalf</i></p>

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	<p><i>Wilderness, and “[t]his would also be true for all wilderness and recommended wilderness areas across the BDNF for all action alternatives”). This conclusion does not follow from the information provided in the SEIS. First, it assumes no unauthorized OSV use within wilderness or recommended wilderness areas.</i></p> <p>Response: Since the implementation of the 2010 recommended wilderness area closures which started in December of 2010, we have documented only incursions of OSV use into one wilderness or recommended wilderness area – the Centennial Recommended Wilderness area (Mt Jefferson area). However, we have no evidence of illegal OSV use into designated wilderness or recommended wilderness areas resulting in adverse effect to grizzly bears.</p>
100-13	<p><i>Second, the agency states that grizzly bears are known to occur consistently on the Madison and Gravelly landscapes. Id. Only a portion of the Madison landscape is within the Lee Metcalf Wilderness. Id. The agency does not claim that grizzly bears only den within wilderness or recommended wilderness. Elsewhere the SEIS states that “[a]reas of regular OSV use are found in the Big Hole, Pioneer and Gravelly landscapes.” SEIS at 24. The agency ignores potential OSV impacts to grizzly bears denning or emerging from dens on the portion of the Madison landscape that is not wilderness, and the Gravelly landscape.</i></p> <p>Response: Please see responses to comments 99-10, 99-29, 100-10 and 100-11.</p>
100-14	<p><i>The SEIS states that the Grizzly Bear Recovery Plan acknowledged greater adverse impacts to bears outside of recovery zones, anticipated lower densities of grizzlies outside of recovery zones, and that only grizzly bears within recovery zones were crucial to recovery goals. SEIS at 98-99. The agency provides no connection between the recovery plan statements about which areas are critical for recovering grizzly bears, and the Forest Service’s conclusion in the SEIS that OSV use is not likely to impact grizzly bears outside of recovery zones.</i></p> <p>Response: Please see responses to comments 99-10 and 99-29. The effects section for grizzly bears in the FSEIS has been updated to incorporate additional information.</p>
100-15	<p><i>Grizzly bears are protected as threatened under the ESA, regardless of their location within or outside of a recovery zone or wilderness. Grizzly bears are also identified as a sensitive species on the BDNF. 2010 ROD at 16. As a threatened species, snowmobile disturbance is a potential “take” requiring management actions.</i></p> <p>Response: The grizzly bear is listed on the BDNF as Threatened. It is not currently included on the Regional Forester’s Sensitive Species List for Region 1 for the BDNF as the reviewer suggests. The Forest consulted with USFWS on grizzly bear for activities in the Forest Plan, including OSV travel, and obtained a Biological Opinion.</p>
100-16	<p><i>Snowmobiles disturb lynx. See Bunnell et al. (2006 (Attachment C3). See also Murray, Steury, and Roth (2008); Shenk (2009). The Forest Service makes the</i></p>

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	<p><i>statement that “[o]ver snow recreation does not modify lynx habitat.” SEIS at 129. This is an absurd statement with no basis in science. As the Forest Service recognizes elsewhere in its analysis, OSV use can cause the snow to become more compacted leaving the area more prone to predators and other competition to occupy the area. See, eg, Yellowstone National Park Service 2011 Final EIS for winter use management in Yellowstone and Grand Teton National Parks...Human modification – through winter road use, OSV travel and OSV trails – of lynx’s deep snow habitats, where they have a competitive advantage over carnivores such as coyotes and bobcats, can eliminate the lynx’s advantage. The Forest Service’s designations outlining where OSV use is allowed on the forest impacts habitat available for the lynx.</i></p> <p>Response: The DSEIS on page 128 states, “The management direction analyzed in the Lynx FEIS and incorporated into the forest plans focus on these types of activities that could affect lynx productivity (USDA Forest Service, 2007b). The Northern Rockies Lynx Management Direction (NRLMD) specifically considered the results of the most recent research and concluded there was “little evidence that compacted snowmobile trails increased exploitation competition between coyotes and lynx during winter on our study area” (USDA Forest Service, 2007b). Since there was little evidence of winter recreation impacts to lynx there are no standards applicable to OSV recreation for lynx in the NRLMD. The guideline related to snow compaction relates to expansion of designated over-the-snow routes or designated play areas. See the DSEIS 128-129, updated FSEIS and response to comment 99-35a.</p>
100-17	<p><i>The ESA requires the Forest Service to ensure that its actions will not jeopardize the continued existence of listed species or result in the destruction or adverse modification of their critical habitat. 16 U.S.C. § 1536(a)(2). OSV use within or near important lynx habitat and corridors may constitute a “take” requiring management action. The Forest Service should reinitiate consultation to ensure that its proposed designations will ensure the continued viability of lynx on the BDNF.</i></p> <p>Response: We have analyzed the impact of the OSV travel management action for areas and trails on lynx in terms of the Endangered Species Act and conclude that the action is not likely to adversely affect lynx. See Biological Assessment and Wildlife Report. There is no critical habitat for the Canada lynx on the BDNF. Please see the response to comment 99-35a.</p>
100-18	<p><i>The SEIS should also consider the cumulative impacts of OSV use on lynx, when combined with other sources of harassment and habitat disturbance. For example, documentation and quantification of coyote invasions into deep snow areas of the Intermountain West lends increased legitimacy to their potential impacts on lynx conservation as discussed by Buskirk et al. (2000) and Ruediger et al. (2000). Potential impacts include habitat loss-fragmentation and competition. The impacts of interspecific competition</i></p>

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	<p><i>include both exploitation and interference competition. Attachment C3 at 835. The Forest Service must consider these cumulative impacts on lynx.</i></p> <p>Response: Cumulative effects of both habitat loss-fragmentation and interspecific competition were considered in the NRLMD and were consulted on with the USFWS. Alternatives 1, 2, 3, 5 and 6 Modified are in compliance with the NRLMD.</p>
100-19	<p><i>Because of encroaching human disturbance on wolverine habitat, biological corridors are important for wolverine persistence. Schwartz, M. K, et al. (2009)... concluded areas with persistent spring snow cover are strongly correlated with gene flow in addition to wolverine denning locations, and identifying potential movement corridors critical for the persistence of wolverine. See also Aubry, et al... Wolverine sightings have been reported on the BDNF in the Pioneer, Beaverhead and Madison Mountain Ranges, as well as the Boulder River Drainage. 2009 Corrected FEIS, Revised BE at 95. The BDNF's Pioneer Mountains include the West Pioneer Wilderness Study Area, an important habitat for wolverine. See U.S. Forest Service Map of BDNF Modeled Wolverine Denning Habitat & Groomed Snowmobile Trails in West Pioneers Wilderness Study Area (Attachment E1). In 2008, the USFS estimated approximately 12 wolverines inhabited the BDNF's Pioneer Mountains. This isolated population is vulnerable to extirpation. The Forest Service has stated elsewhere that it considers wolverine inhabiting the Pioneer Mountains to play an important role in sustaining and recovering regional wolverine populations. The BDNF provides wolverine maternal habitat. See U.S. Forest Service, Beaverhead-Deerlodge National Forest, Overlap of Wolverine Habitat & Winter Motorized Recreation (Attachment E2) (map overlaying wolverine maternal habitat with winter motorized recreation). The Mt. Jefferson area and the West Big Hole connecting to the Anaconda Pintler Wilderness provide wolverine denning habitat that is open to motorized use. The Forest Service has recognized that snowmobiles near den sites negatively impacts female wolverine, and that snowmobile disturbances can adversely affect the survival of their young. FEIS at 513. The Forest Service should more clearly disclose the impacts of OSV use on wolverine in the SEIS.</i></p> <p>Response: Please see responses to comments 99-10, 99-32 and updated analysis in the FSEIS.</p>
100-20	<p><i>The Forest Service impermissibly downplays the impacts of OSV use on mountain goats, resulting in a skewed analysis of the impacts that prevents meaningful public comments. See, e.g., SEIS at 41 (explaining “[t]he impacts of human disturbance on goat populations have been clearly demonstrated in numerous cases; however, these cases conspicuously lack a clear case demonstrating the effects of recreation on goats during winter.”). As explained above, the Forest Service may not dodge its duty under NEPA to disclose likely impacts by claiming there is no direct evidence of impacts on the BDNF...Yet the 2015 SEIS provides</i></p>

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	<p><i>no results of monitoring for mountain goats or wolverine. Instead, the Forest Service relies on literature reviews and hunting information from the state. The agency should disclose and consider the results from its monitoring since 2009 in the SEIS. Lacking monitoring results, the Forest Service should explain where it estimates the mountain goat winter range to exist.</i></p> <p>Response: Mountain goat populations are monitored by MFWP biologists. Table 20 in the DSEIS displays the MFWP estimated population data and survey averages. No MFWP hunting information was utilized in the existing condition or effects analysis. Please refer to comment 7-1.</p>
100-21	<p><i>Mountains goats have extremely limited winter range, making protection of these areas on the BDNF through closures to OSV use critically important. Montana Department of Fish, Wildlife & Parks noted in its comments on the Revised Forest Plan that stress and displacement from open ridges may be playing a role in population declines. Mountain goats have been observed at higher elevations on Antone Peak, south facing slopes of Sawtooth Peak, and at Sunset Peak. In addition, areas where protection is especially important include West Big Hole, Flint Uplands Management Area, East Pioneers, West Pioneers, and the upper basins in Big Gulch and Barker Creek. Montana Department of Fish, Wildlife & Parks’ comments also identified Trask, Goat Mountain, Meadow, and Dolus Lakes as high cirque basins where mountain goats were observed during spring aerial surveys in 2007.</i></p> <p>Response: The big game effects section in the FSEIS has been updated to incorporate landscape-specific comments from on-the-ground knowledge from local MFWP biologists. Please see responses to comments 7-1 and 100-20. In addition, it should be noted that Antone Peak, Sawtooth Peak and Sunset Peak are in the Snowcrest Mountains and are closed to OSV use in Alternatives 3, 5 and 6 Modified. Further Antone Peak and Sawtooth Peak are outside mountain goat winter range as identified by MFWP.</p>
100-22	<p><i>Goats are strongly habituated to their home ranges. This behavior is reinforced by the discontinuity of suitable habitat separated by large expanses of unsuitable habitat avoided by goats. Therefore, extirpation of an isolated population, an event often associated in the past with over-hunting, may take decades or more to be re-colonized by goats. Controlling human use in mountain goat habitat is therefore essential to allow goats to utilize favorable habitats and to avoid potentially fatal excessive energy expenditures. Some evidence exists that summer goat populations choose habitats away from mountain lakes, where human use is most frequent. Winter use, however, has much more potential to have adverse impacts, as suitable winter habitat is much more restrictive and because the inability of goats to use the most desirable habitat occurs during the most stressful period of the year. In addition, energy expenditure to escape human disturbance during winter can be expected to result in reduced winter survival, especially for young kids.</i></p>

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	<p><i>Because mountain goats are sensitive to loud noises, snowmobiles are likely to affect their behavior depending on proximity and duration of the disturbance. The Forest Service must recognize the likely impacts of OSV use on mountain goats in the BDNF. We urge the Forest Service to prohibit OSV use within a half mile of known existing or historic mountain goat winter habitat.</i></p> <p>Response: Please see responses to comments 7-1 and 100-20.</p>
100-23	<p><i>The science is clear: motorized access over snow makes life more difficult for ungulates through physiological stress resulting in increased movements and higher energy expenditures. Attachment A at 11 (citing studies). For example, trends toward more mild winter conditions should have resulted in more elk use of the Boulder River country, but intensive recreational snowmobile use has increased and appears to have precipitated elk redistribution away from their normal winter range. Joslin, G. (2000), page 9. Increased snowmobile use has displaced elk from winter range at Berkin Flat in the Jefferson Ranger District.</i></p> <p>Response: As mentioned in the response to comment 99-10, the big game section in the FSEIS has been updated to incorporate landscape-specific comments from MFWP, including the Boulder Landscape. This question was specifically asked to all the FWP biologists interviewed and in all but one Landscape (Boulder), experience and on the ground knowledge is not suggesting that OSV use is moving elk. It was explained that generally due to snow depth and forage availability, the elk have in most cases already moved to lower elevations less conducive to snowmobiling. Berkin Flat is within the Boulder Landscape and the local MFWP biologist in the Boulder Landscape stated that currently elk are utilizing the winter range in the Landscape. However, OSV travel is occurring on the winter range and potential effects to elk are likely (Pers. com. MFWP 2016). Alternative 6 Modified includes the closure of additional winter range areas (as proposed by MFWP) from those areas closed to OSV travel in Alternative 1, specifically to minimize effects to elk and moose winter range in the Boulder Landscape. Berkin Flat is closed in all alternatives.</p>
100-24	<p><i>Moose have been displaced in certain areas of the forest due to OSV use, including parts of the West Fork Madison River and traditional winter range in Berkins Flat on the Jefferson Ranger District. 2009 Corrected FEIS at 492; 509-10. See also (Attachment F) (map showing elk, moose, mule deer, and mountain goat distributions in comparison to areas open to OSV use under modified Alternative 6). The Montana Department of Fish, Wildlife & Parks highlighted in comments to the Forest Service the importance of not approaching or stressing moose that occur commonly throughout the entire Boulder River-Sheepshead Management Area in the winter. It also explained the importance of minimizing damage to riparian areas that provide moose forage, and noted that through aerial surveys the agency had detected snowmobilers driving cross-country through willow communities, likely causing damage to the health and vitality of</i></p>

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	<p><i>the plants and reducing moose forage.</i></p> <p>Response: As mentioned in the response to comment 99-10, the big game section in the FSEIS has been updated to incorporate landscape-specific comments from MFWP. There are only a few cases where MFWP biologists are seeing effects to moose from OSV travel and they are as the reviewer describes above, in the Boulder and Gravelly Landscapes. Alternative 6 Modified closes additional winter range areas specifically for elk and moose in the Boulder Landscape. The local MFWP for the Boulder River area informed us she has not recently noted extensive snowmobile use in willow communities along the Boulder River during aerial surveys. In the Gravelly Landscape, the local MFWP biologist recommended an education plan that involves signing in moose habitat. The Madison District Ranger agreed to proceed with this signing plan (beginning with the 2016/2017 winter season) to minimize effects to moose wintering in willow bottoms along the West Fork of the Madison.</p>
100-25	<p><i>Snowmobile use impacts small mammals that burrow under the snowpack. Specifically, snow packing by snowmobile use reduces the insulating value of the snow and increases mechanical barriers to small mammal movements beneath it. Jarvinen and Schmid (1971) found that snowmobile compacted snowfields increased the winter mortality of small mammals. They indicated that compaction inhibited mammal movements beneath the snow and subjected subnivian organisms to greater temperature stress. The Forest Service also recognizes that “[a]s the snow is compacted the soil temperature below can be reduced.” SEIS at 93 (Baker and Bithmann 2005). Snowmobiles also affect snowshoe hare and red fox mobility and distribution. (Joslin, G. et.al. 1999 p.4.8). The Forest Service should more clearly disclose the impacts of OSV use on small mammals.</i></p> <p>Response: Potential effects to small mammals could be measured by the amount of the forest open and closed to OSV use. Tables 1-11 show the acres and percentage of the landscapes that are motorized and non-motorized in the DSEIS. That said, these figures greatly overestimate the amount of the BDNF that is actually utilized by OSVs. The DSEIS on page 23 explains that, “...the majority of winter use is concentrated around developed sites and along roads, where many roads are managed as snowmobile or ski routes.” It also explains on page 23-24 that not all acres classified as open are useable by OSVs. A more accurate representation of where potential effects to small mammals are possible is on page 25, Figure 8; the OSV use patterns map as identified by Forest recreation specialists. Table 12 displays the percent use by landscape, based on these maps. In general, over the snow “play areas” would affect small mammals more than groomed routes as these are generally on roads which provide low quality subnivean environments due to the absence of access sites for burrows and runways provided by vegetation and debris. See updated FSEIS.</p>

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100-26	<p><i>Relying on the lack of direct evidence, the agency concludes that any impacts to soil and vegetation are negligible...These assertions do not constitute a hard look or the necessary, more granular analysis. The Forest Service fails to provide the results of its “numerous years of observations” supporting its statements, citing instead to a single personal communication in 2015. SEIS at 93. The statements are general and conclusory, without providing any actual measures or an effects indicator. We are left to wonder when the Forest Service made observations and what indicators the agency was looking for. A lack of observable impacts means little if the agency is not specifically looking for them. There is no discussion about whether the agency conducted observations in the early and late season when low snow cover is an issue, or how climate change may be affecting the times of year when there is adequate cover. Without any justification, the agency concludes “[a]ctivities occurring on roadbeds and trails are probably having little effect on vegetation as the areas are already compacted.” SEIS at 94. This ignores the likely cumulative impacts of OSV use, which adds a stressor to these areas that are already compacted and the surrounding vegetation.</i></p> <p>Response: Please refer to the response to comment 99-38. The SEIS appropriately discloses effects to vegetation and soils from OSV use during low snow conditions on roads and trails. National Forest System roads and trails are specifically managed to accommodate vehicle, stock and foot traffic. Construction and use of these routes lead to compacted soil conditions typically devoid of vegetation. The routes are maintained in this condition with the intent of accommodating traffic. OSV use in low snow conditions do not alter soil or vegetative conditions of the route.</p>
100-27	<p><i>In addition to lacking a basis for these statements, the Forest Service’s conclusions run contrary to science. It is well established that OSV use damages exposed soils and vegetation, especially early or late in the season where there is a likelihood of inadequate snow levels. It may also occur where wind exposes soil and vegetation. According to Boyle and Sampson (1985), OSV use caused significant damage to browse plants. See also Joslin, G. et.al. 1999 p.4.8. The Forest Service recognizes that as snow is compacted the soil temperature can be reduced and soil microbial activity and germination of seeds can be slowed. SEIS at 93 (Baker and Bithmann 2005). The agency also notes how compacted snow can lead to wet and soft trails due to slower snow melt, ultimately leading to damage by other users in the spring. SEIS at 93. It states it is possible for OSVs to run over trees and shrubs tearing at the bark, ripping off branches, or topping trees. SEIS at 94.</i></p> <p>Response: The winter recreation season on the BDNF is December 2nd through May 15th, the typical season when deep snows suitable for OSV use are present. The SEIS clearly recognizes the above impacts from OSV use are possible. The SEIS then places these potential effects within the on-the-ground</p>

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	<p>effects displayed on the BDNF. While these effects occur on the BDNF, they are rare and of such limited extent we are unable to identify location where the effects are discernible on the BDNF. If future site-specific impacts are identified the monitoring and closure ability under the travel management rule designation process gives the tools necessary to deal with future conditions and use. 36 C.F.R. 212.50 et. seq.</p>
100-28	<p><i>The greatest vector for spread of weeds is through motorized vehicles—cars, trucks, ATVs, and even snowmobiles. See U.S. Fish and Wildlife Service, Selawik Compatibility Determination (2011) (Attachment G), page 3 (describing “possible introduction of invasive plant species . . . from seeds carried on snowmobiles or sleds”). A single vehicle driven several feet through a knapweed site can acquire up to 2,000 seeds, 200 of which may still be attached after 10 miles of driving. See Montana Knapweeds: Identification, Biology and Management, MSU Extension Service (2011) (Attachment H). Off-road vehicles are designed to, and do, travel off-trail, disturbing soil, creating weed seedbeds, and dispersing seeds widely. Plus, fuel leaks and exhaust from OSV use (see discussion below) also negatively impacts soil quality and vegetative health. But the agency discounts any of the possible impacts on the basis that forest resource specialists have not identified damage to soil in any landscape from OSV use. See, e.g., SEIS at 94, 95 (noting a laundry list of OSV impacts to vegetation and stating “[h]owever, on the BDNF this has not been observed”). As stated above, the agency fails to provide support for those observations other than through single personal communications in 2015. The Forest Service should disclose all of the information it has collected demonstrating there are no OSV impacts to soil or vegetation on the BDNF.</i></p> <p>Response: The reference to USFWS compatibility determination on a national wildlife refuge in Alaska, while disclosing weed introduction from snowmobiles is possible, also notes no introduction of invasive species have occurred to date. Recommendations in the MSU Extension Service bulleting (pg. 9) include avoiding driving through weed infestations, especially when flowering and shortly thereafter. In Montana, noxious weeds do not flower during the winter recreation season (December 2-May 15). The 2009 FEIS (pg. 479) discloses potential effects of OSV use and the spread of noxious weeds. Most noxious weeds will have released their seeds in areas off forest where winter vehicles originate. Also on forest weed patches will mostly have released their seeds before winter vehicle use could acquire them and spread from existing patches to new areas. While not impossible for weed seeds to be transported by winter vehicles it is unlikely that winter vehicle use has a measurable effect as a vector of noxious weed seed on the BDNF.</p>
100-29	<p><i>The agency also claims that because the most heavily compacted OSV routes “largely follow existing roads and trails,” any impacts would be a maintenance issue and not a natural resource concern. SEIS at 93, n 11. In addition to being</i></p>

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	<p><i>an overly general statement, we are confused by the agency’s reasoning that impacts from OSV use must be cabined by a single category. Heavily compacted OSV routes along existing roads and trails cause both maintenance concerns and natural resource concerns, which are both impacts that the Forest Service must discuss in its NEPA analysis. Worse, by relying on a lack of direct evidence of OSV damage the Forest Service improperly discounts and ignores the direct, indirect, and cumulative impacts from OSV use.</i></p> <p>Response: See the response to comment 100-26.</p>
100-30	<p><i>Relying on the 2009 FEIS, the Forest Service notes, “overall emissions from OSV use on the BDNF are unlikely to exceed National Ambient Air Quality or Montana Air Quality Standards.” SEIS at 93. But National Ambient Air Quality Standards (NAAQS) are federal minimum standards. Failing to exceed the NAAQS in no way supports that OSV emissions are negligible...Much information is available regarding snowmobile noise and pollutant emissions and environmental effects...As stated in the U.S. Department of the Interior document, Air Quality Concerns Related to Snowmobile Usage in National Parks, Feb. 2000, hydrocarbon emission rates from 2-stroke snowmobile engines are about 80 times greater than those found in 1995-96 automobile engines. A majority of these hydrocarbons are aromatic hydrocarbons, including polyaromatic hydrocarbons, which are considered to be the most toxic component of petroleum products, and aromatic hydrocarbons are also associated with chronic and carcinogenic effects. The actual and potential environmental and human health effects from snowmobile emissions of noise, hydrocarbons and carbon monoxide are probably best summarized in the 2011 Yellowstone National Park Winter Use EIS.</i></p> <p>Response: The 2011 Yellowstone National Park Winter Use EIS was replaced by the February 2013 Yellowstone National Park Winter Use Plan Supplemental EIS. This February 2013 EIS, as did supporting studies, found that air emissions in Yellowstone National Park are below all regulatory standards. On the basis of the February 2013 EIS, Yellowstone National Park adopted rulemaking setting daily levels of snowmobiles entering the Park. The Final Rule (October 2013) set limits of 110 transportation events per day consisting of no more than 50 snowmobile transportation events with the remainder of transportation events set aside for snowcoaches. A snowmobile transportation event is defined by the National Park Service as no more than 10 snowmobiles in a commercially guided group. As such, the daily snowmobile entry into Yellowstone National Park may be up to 500 snowmobiles (not including the 20 snowmobiles that may be allowed for non-commercially guided groups). This contrasts with the BDNF where the heaviest OSV use in staging areas is estimated to be 5 to 10 OSVs increasing to 15 to 20 on the weekends. The February 2013 EIS has been added to the project file.</p>
EI100-31	<p><i>BDNF provides no testing results as proof that the NAAQS have not been</i></p>

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	<p><i>exceeded on the forest despite the statement in the LMP that “[t]he Forest Service will conduct monitoring for AQSRV” See 2009 Corrected FEIS at 88. If the Forest Service has conducted air quality monitoring pursuant to the LMP, it should make the resulting data available to the public in the SEIS...In addition, there are numerous studies underway to more clearly determine what environmental effect these pollutants may have. EPA has recommended that the BDNF monitor the results of these studies and consider the results when evaluating future management direction for winter snowmobile use.</i></p> <p>Response: The SEIS discusses the impact of OSV use on the BDNF taking into consideration vehicle emission monitoring in Yellowstone National Park and elsewhere. The BDNF is monitoring the results of studies and the EPA, in its comment response on this SEIS, did not recommend specific monitoring of OSV emissions on the BDNF.</p>
100-32	<p><i>Increased snowmobile pollutant emissions could be particularly problematic in areas where snowmobiles congregate (i.e., trailheads) and during short periods of poor air dispersion (e.g., valleys where frequent inversion conditions may trap air pollutants). See 2009 Correct FEIS at 85... For this reason trailheads are areas where this concern is greatest. If there are heavily used trailheads with large numbers of snowmobiles where stable air is present, the Forest Service should consider placing signs or implementing patrols on heavy use mornings to encourage users to limit idling time. The U.S. Environmental Protection Agency (EPA) and Montana Department of Environmental Quality also encourage use of the newer less polluting 4-stroke engine snowmobiles...The Forest Service should consider similar outreach and education to OSV users on the BDNF.</i></p> <p>Response: The SEIS does discuss air quality and that the use even at trailheads is not concentrated to the extent of having an impact. Outreach programs by other agencies would encompass use on the BDNF.</p>
100-33	<p><i>Emissions from OHVs can include a variety of contaminants that may settle directly in wetlands, or be deposited in snow or soil during rain events, from which they may be mobilized into wetlands. Snowmobile pollutants negatively affect water quality and aquatic habitats, especially where they accumulate in areas of frequent use such as along designated routes. The agency states “there is no real aquatic biological or water quality risk related to emissions from OSV use in Yellowstone National Park” and concludes “there is minimal risk to those where OSV use occurs at vastly lower concentrations levels on the BDNF under any alternative.” SEIS at 93. Again, the Forest Service fails to support these general and conclusory statements.</i></p> <p>Response: The statements in the SEIS are supported by references to studies discussed in the Literature Review in the section.</p>
100-34	<p><i>Best available science indicates there is a risk to water quality from OSV emissions. The Forest Service discounts the results from the Arnold and Koel (2006) study that detected benzene, ethylbenzene, m- and p-xylene, o-xylene,</i></p>

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	<p><i>and toluene in snowmelt runoff exposed to significant snowmobile emissions in Yellowstone National Park. Although all compounds were within concentration limits set by the EPA, it is unclear what the cumulative impacts of these chemicals may have on watersheds. Indeed, the Forest Service goes on to explain how many other sources contribute to contamination of snowmelt, including regional pollution deposition. SEIS at 94 (citing McDaniel 2013). The risk of adverse cumulative impact to water quality is a very real impact that the Forest Service must consider.</i></p> <p>Response: Please see response to comment 100-36 and the SEIS in terms of consideration of Arnold and Koel (2006) and its conclusions. Please also see response to comment 99-40 concerning the McDaniel (2015) study.</p>
100-35	<p><i>The SEIS fails to explain how the agency determined “[w]ater quality has not been an issue with OSV use in the past.” SEIS at 93 (citing only on a personal communication in 2015). Public user demand and motorized recreational access has increased significantly over the last 20 years. Off-road vehicles (ORVs), including snowmobiles, can access areas much further into the forest than they could historically. This use results in direct impacts, especially on steep slopes, fragile soils, wet meadows, and around water bodies. Trails often tend to become wider and rutted with heavy motorized use, creating a need for monitoring conditions and carrying out needed repair and erosion control.</i></p> <p>Response: Supporting statements for the quoted sentence follow in the remainder of the paragraph on page 93 of the DSEIS and the literature review for potential effects to watersheds (beginning on DSEIS, pg. 93). The personal observations are made by the BDNF fisheries biologist with more than 25 years of professional experience on the BDNF. Please note that references in the 2009 Forest Plan to increased OSV use in the past 20 years reflects the changes that occurred since the 1986/1987 Beaverhead/Deerlodge National Forest Plans were originally approved. This increase in use occurred during the tenure of the fisheries biologist making the observations.</p>
100-36	<p><i>Federal and state agencies have raised concerns about potential impacts from OSV use on water quality in specific areas on the BDNF. See, e.g., 2008 Comment from EPA (Attachment I) (noting the 2009 FEIS identified 129 functioning-at-risk and 166 non-functioning stream reaches, 74 watersheds in “poor” condition with low geomorphic, hydrologic, & biotic integrity, and 269 water quality impaired stream reaches (i.e., 303(d) listed waters)). The 2009 FEIS provided a map of state-listed 303(d) watersheds, based on the state’s 1996 list. See 2009 Corrected FEIS at 100. But here, the 2015 SEIS makes no mention of 303(d) watersheds in comparison to the proposed OSV designations. The Forest Service must provide information as to the location of 303(d) watersheds based on Montana’s most recent list, as well as information on where OSVs have the opportunity to cross frozen lakes or streams, and where those routes or areas run adjacent to lakes or streams.</i></p>

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	<p>Response: Current and potential impacts resulting from existing or possible future increases in OSV use on the BDNF are not expected to approach or exceed the levels measured by Arnold and Koel (2006) in Yellowstone National Park which has shown little to no measurable negative effects from OSV use adjacent to water bodies at much higher use levels than are present across the BDNF we believe here are no concerns in complying with the Clean Water Act which sets the threshold of a statistically measureable increase in the associated TMDL a stream is listed for. Furthermore the 303d list impairments range from sediment to metals but rarely include things like hydrocarbons or other potential toxins that could be associated with OSV exhaust. Current TMDLs for streams located on the BDNF have never identified OSVs as a probable cause for any impairment or discussed OSV travel as contributing to any impairment. Therefore additional analysis is not needed at this time. Please note that EPA’s comments concerning clean water were not limited to or focused on OSV use and encouraged road decommissioning and reduction in road density to improve not only watershed conditions and aquatic health but to protect and enhance wildlife habitat and connectivity. Road decommissioning and road densities are not associated with OSV use.</p>
100-37	<p><i>Snowmobiles release toxins such as ammonium, nitrate, sulfate, benzene, and toluene, which accumulate in the snowpack and increase acidity. Attachment A at 12. Spring runoff discharges these accumulated pollutants as a pulse into the soil, groundwater, and surrounding waterbodies. Id. A recent University of Montana study documents the gasoline burned by snowmobilers within the state, illustrating that the sport is a substantial source of emissions with negative impacts on air quality. See Sylvester, J. T. July 2014 (Attachment J). Options for minimizing these impacts include, inter alia, ensuring maintenance of bridges and culverts to prevent erosions during spring runoff and monitoring routes and areas to ensure measures taken are effectively mitigating impacts to water quality, soils, and vegetation.</i></p> <p>Response: Please see response to comments 99-40, 100-32, and 100-33. Additionally the Forest Service personnel, as part of their regular duties, monitor bridges, culverts and routes for maintenance purposes.</p>
100-38	<p><i>Where there is evidence of OSV use near or on lakes and streams, the Forest Service has not analyzed those impacts in the SEIS. For example, in previous comments on this LMP, the Montana Fish, Wildlife and Parks department stated “Special note should be made that the frozen surface of Cottonwood Lake is intensively used by snowmobiles, and that approximately 30% of all fuel passes through two-stroke engines, thus emitting the photo toxic compounds MTBE and PAH into Thunderbolt Creek – a Westslope cutthroat trout stream.” AR Doc. G5-06, page 9. The Forest Service makes no mention of the impacts to water quality from OSV routes or areas that cross or run along Cottonwood Lake. The SEIS fails to account for potential water quality impacts to</i></p>

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	<p><i>Thunderbolt Creek and Westslope cutthroat trout or on Cottonwood Lake from petroleum products, human waste, and other impacts that will result from concentrated use along these OSV routes. At least one route travels along Thunderbolt Creek within the riparian zone, but the analysis in the SEIS does not discuss how this route was selected to minimize impacts. Similarly, the analysis does not discuss routes in Antelope Basin or Antone Cabin areas that run along riparian areas. The SEIS fails to discuss any cumulative impacts to these waters from current and possible increases in OSV use as a result of the route designations. There is also concentrated snowmobile use on designated routes near tributaries and creeks along Road #056 (including Poison and Anthill Creeks), as well as along Road #325 (Robb Creek and S. Fork-Blacktail Deer Creek). See also Attachment E1 (showing groomed snowmobile trails along, e.g., Springs Creek, Odell Creek, Bear Lake, and Wyman Creek). The SEIS apparently ignores potential impacts and makes no attempt to minimize the impacts of these OSV routes on water quality.</i></p> <p>Response: Please see responses to comments 99-42 and 100-41. The groomed snowmobile trails delineated on Attachment E1 are located in the West Pioneer WSA and are no longer groomed.</p>
100-39	<p><i>The number of cross-country skiers is decreasing in areas where snowmobile use is allowed to increase, due to the disproportionate and negative impacts that OSV use has on the experience of non-motorized recreationists. 2009 Corrected FEIS at 350, 512. Yet a recent study by the Winter Wildlands Alliance documents that the BDNF has designated 1.3 times as many acres of the forest open to OSV use, despite there being 7.2 times as annual cross-country ski and snowshoe visits as compared to snowmobile visits. Winter Wildlands Alliance (WWA), Winter Recreation on National Forest Lands (June 2015) (Attachment K), pages 12-13. WWA collected information from Forest Service offices across the country to compile the most complete report of its kind. The report provides levels of use, miles of available motorized and non-motorized groomed trails, and acres open and closed to motorized use, by forest and by region. The existing designations on the BDNF, skewed in favor of OSV use despite the greater number of non-motorized recreational forest users, do nothing to minimize conflicts among those uses. This is despite the Forest Service’s own information estimating cross-country skiing visits to the BDNF will increase, while snowmobiling is projected to see less growth on the forest. SEIS at 22.</i></p> <p>Response: The 2009 FEIS states that there have been large increases in snowmobile use over the last fifteen years. Additionally, technologic advances in snowmobile design have led to snowmobiles penetrating further into backcountry areas. Forest recreation managers believe that changes to snowmobile opportunities in Yellowstone Park may result in increased snowmobile use on adjacent NFS lands (FEIS, pg. 350; 512). The 2009 FEIS also states that the number of visits by cross-country skiers is</p>

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	<p>increasing in some areas, particularly the Big Hole, where snow conditions are often excellent and a trail system at Chief Joseph Pass has been developed. The 2009 FEIS states that some places are seeing decreases in cross-country skiing as snowmobile use increases (FEIS, pg. 350), but does not state as the reviewer does that the cause is disproportionate and negative impacts that OSV use has on the experience of non-motorized recreationists.</p> <p>In situations where motorized vehicles are not an expected encounter, such as in an areas where motorized vehicles are prohibited, the likelihood for feelings of conflict is very high in the event of such an encounter. Where motorized and non-motorized use is allowed, it is important for recreationists to align expectations with the potential that they will encounter both motorized and non-motorized users. The DSEIS also discusses use conflicts occurring at Mt. Jefferson, as well as the potential for conflict in the area of Chief Joseph Pass (although currently precluded by positive cooperation between clubs). Please see the section on Use Conflict in the SEIS (DSEIS beginning on pg. 154), and the response to comment 99-15.</p>
100-40	<p><i>The SEIS analysis states that results from a study running October 2014 through September 2015 are not yet available. SEIS at 23. The Forest Service should explain why those results are not yet available, and provide them to the public when they do become available. Until then, WWA’s report appears to be the best available science regarding current demands and uses of the forest.</i></p> <p>Response: This comment appears to refer to the National Visitor Use Monitoring (NVUM) study that was conducted from October 1, 2014 through September 30, 2015 (Round 4). The results of that study are currently in the process of being compiled by National Visitor Use Monitoring program personnel, and we anticipate that the results will be uploaded into the NVUM results database over the coming months. More information about the NVUM is provided at: http://www.fs.fed.us/recreation/programs/nvum. Please also see response to comment 99-15, and the section on Winter Use Information in the SEIS, where the NVUM is further explained.</p>
100-41	<p><i>OSV use in WSAs degrades the areas’ naturalness, diminishes opportunities for solitude and primitive recreation, and vastly reduces the likelihood that Congress will eventually designate the areas as Wilderness. The Forest Service is required to manage Wilderness Study Areas “to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System.” Montana Wilderness Study Act, Pub. L. No. 95-150, § 3(a), 91 Stat. 1243 (1977). See also Montana Wilderness Ass’n v. McAllister, 666 F.3d 549 (9th Cir. 2011). Allowing OSV use in these wilderness-quality lands develops a constituency for the continuation of that use. It can also result in outright reduction of the wilderness potential of an area through physical degradation of the landscape and diminishment of its wilderness characteristics. In fact, the mere presence of motorized uses has resulted in</i></p>

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	<p><i>areas no longer being seriously considered for Wilderness designation, in itself a de facto reduction of wilderness potential...There are instances of overlap between OSV and WSA areas, see Attachment E1, but the Forest Service provides little information about these overlaps.</i></p> <p>Response: The draft Supplemental EIS discussed the wilderness study areas on pages 165-166 in terms of wilderness characteristics and OSV use. There are two WSAs on the BDNF – the West Pioneers and the Sapphire Mountain WSA. Under Alternative 6 Modified the West Pioneers WSA is open to OSV use. For the Sapphire Mountain WSA on the BDNF 22% is open to OSV use in Alternative 6 Modified. Forest Plan p. 260-261. Trail grooming ceased in the West Pioneers as part of a settlement agreement in December 2009. As such there are no groomed OSV trails in either WSA. Additional discussion of OSV use on wilderness characteristics and wilderness potential of WSAs is included in the FEIS.</p>
100-42	<p><i>The Forest Service acknowledges that non-motorized users consistently point to the importance of solitude for the enjoyment of their activities, as well as the absence of noise and fumes generated from motorized vehicles. SEIS at 153. Additional impacts the forest should consider when trying to minimize conflicts among uses include changes to the landscape that result from snowmobile tracks, documented illegal motorized entry into non-motorized areas, locations where enforcement of closed areas or trails is logistically more difficult, and unsafe behavior of some motorized recreationists that endangers non-motorized recreationists. See 2010 ROD at 7 (explaining that “[t]racks in snow fields and high mark play areas may be widespread and affect natural appearance and sense of solitude” and “[s]now machines are often audible over great distances, affecting solitude and secure wildlife habitat.”). Improved technology has lowered snowmobile sound levels to 71 decibels (dB) at 50 meters from the source. Mullet, T.C. (2014) (Attachment B), page 23-24. Snowmobiles moving across landscapes, including remote wilderness areas, while emitting noise may have compounding effects on wildlife stress and distribution, and OSVs may even unintentionally “chase” animals in response to noise. Id</i></p> <p>Response: The SEIS discusses noise impacts both in terms the level of sound impacts based on acoustic modeling in Yellowstone National Park and use conflicts on solitude, natural settings and in the quality of the user’s experience. Noise effects are also discussed in the wildlife analysis. Please see response to comment 100-7 in terms of consideration of Mullet, 2014.</p>
100-43	<p><i>Unauthorized OSV use is having and will have significant impacts that the analysis in the SEIS does not discuss. The agency recognizes that illegal motorized use impacts the opportunities for solitude and primitive recreation, and that illegal snowmobile incursions into closed areas and Wilderness Study Areas cause impacts. SEIS at 156. Other than considering the impacts of illegal</i></p>

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	<p><i>OSV use on quiet recreational uses, the SEIS contains no discussion of how violations of OSV closures impacts other forest resources.</i></p> <p>Response: The unauthorized use discussed on page 156 of the DSEIS is in relation to Mount Jefferson and the adjacent BLM Wilderness Study Areas. Please see our response to comments 25-1 and 99-18 in terms of Mt. Jefferson unauthorized OSV use. Regarding other areas closed to OSV use, including recommended wilderness areas, the Forest Service has not documented or been made aware of incursions that have had identified impacts to forest resources. Please see response to comment 100-12. The two Forest Service Wilderness Study Areas (Sapphire Mountain and West Pioneers) are discussed in our response to comment.</p>
100-44	<p><i>For example, a 2000 report from the MFWP identified illegal OSV use as having potentially serious impacts on wildlife in areas protected from motorized use. Joslin, G. 2000. Final Report: Snowmobile Activity Survey in relation to Wildlife Habitat in portions of the Helena and Deerlodge National Forests. Montana Fish, Wildlife and Parks Region 3 – Helena Area Resource Office, page 17. That report identified Thunderbolt-Electric Peak as an area used by wolverine. A March 6, 1999 flight report noted illegal use by two snowmobilers on the roadless area boundary that appeared to be stuck, and more than two snowmobile tracks in the Little Blackfoot and Bison Roadless area. Id. at 9. Over the course of two years, six aerial surveys revealed extensive off-trail use in the year that grooming was not conducted (1997-98) and the second year snowmobile Red Rock Road was groomed (1998-99). The report noted numerous actual and potential snowmobile-wildlife conflicts, and that grooming did not reduce off-trail travel. Id. at 9. Finally, the report concluded that a groomed route can result in more use and more off-trail users because snowmobiling on National Forest lands has not been widely restricted to designated routes or areas and because groomed trails are an attraction for snowmobile users. Id. at 11. This results in cumulative impacts on natural systems that support wildlife. Id.</i></p> <p>Response: The wildlife analysis in the supplement discusses the impacts of OSV use off groomed and marked trails as it considers OSV use throughout areas open. There are only 3 designated OSV routes in areas that are within closed areas on the Forest. These 3 routes are specifically considered in the 2012 SFEIS.</p> <p>The Little Blackfoot and Bison Roadless areas are located on the Helena National Forest. The reports referenced in this comment (1997-1999) occurred during a time when off trail use was authorized (see Alternative 1). The purpose of grooming is not to limit off-trail use in an area open to OSVs. Alternatives 3, 5 and 6 Modified consider closing some areas around Electric Peak.</p>
100-45	<p><i>Unauthorized OSV use is likely to continue on the BDNF. The Forest Service</i></p>

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	<p><i>should analyze how designated OSV routes and areas may facilitate illegal use, thereby causing additional impacts to natural resources, wildlife, and habitat. In the very least, the Forest Service should seek to ensure user compliance, thereby reducing enforcement obligations. OSV designations should establish clear boundaries with simple, consistent restrictions designed to minimize resource damage and conflicts among uses.</i></p> <p>Response: The Forest Service cannot reasonably predict where and when illegal or unauthorized OSV use may occur in areas where such use is prohibited, and the possibility of unauthorized use does not require that the Forest Service affirmatively address in an EIS every uncertainty. Also, in the Travel Management Rule the Department of Agriculture recognized that law enforcement can at times be a constrained resource, but inadequate law enforcement should not lead to blanket closures of NFS lands to recreational users. 70 FR 68269.</p> <p>The agency aims to balance recreational uses, and where the Forest Service identifies considerable adverse effect, including public safety, monitoring is conducted that may lead to a decision to restrict certain uses. 36 C.F.R. 212.52. It is a violation of federal regulations for anyone to engage in unauthorized OSV use. 36 CFR 261 et seq. The Forest Service also maintains cooperative relationships with other federal agencies, as well as State and local law enforcement agencies in order to provide mutual support across jurisdictional boundaries. Education and cooperative relationships with users support enforcement efforts by promoting voluntary compliance, which is critical to the effectiveness of decisions that authorize motorized uses. In terms of the comment’s concern with boundaries please refer the responses to comments concerning Mt. Jefferson. The Forest Service does not have evidence to suggest that boundaries are not clearly defined between open and closed areas.</p>
100-46	<p><i>Effective winter travel management planning and compliance with the minimization criteria require the Forest Service to account for existing and potential future over-snow recreational uses that may not satisfy the definition of OSV. See Exec. Order No. 11644 § 3(a)(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 lands .”). For example, fat-tire bike riding is an increasing wintertime mechanized use throughout the Northern Rockies and nationally. Other new types of motorized or mechanized over-snow uses may also exist or be developed over the life of the winter travel plan. The Forest Service should also acknowledge that improvements in snowmobile technology may allow OSV use in regions that currently present physical constraints such as steep rocky cliffs. SEIS at 32 (acknowledging “that technological advances in snowmobile design have led to snowmobiles penetrating farther into backcountry areas”). The OSV plan and corresponding</i></p>

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	<p><i>NEPA analysis should address the non-OSV over-snow uses that are already occurring on the forest, and should anticipate and provide a process for addressing future over-snow uses through updates to the plan. Failure to address these ongoing and foreseeable uses of the forest that may be impacted by OSV designations would result in both an inadequate NEPA analysis and inadequate minimization of conflicts with other uses.</i></p> <p>Response: This comment primarily concerns consideration of non-OSV over-snow uses, specifically fat-tire bicycles. The SEIS focuses on OSV use, which is motorized use, and considers conflict of uses. We have no information to suggest that use of fat-tire bicycle in the winter is a significant use. Non-motorized use when it occurs is limited in distance from a plowed parking area. The Forest Service is monitoring such use on particular routes, specifically in relation to effect on cross-country ski trails. In terms of the portion of the comment that states that the Forest Service should acknowledge that improvements in snowmobile technology may allow increased OSV use in areas, the SEIS has been updated to address this issue.</p>
100-47	<p><i>The Forest Service should account for project climate change impacts in its application of the minimization criteria and OSV designation decision...Climate change considerations should include the potential for reduced and less reliable snowpack and increased vulnerability of wildlife and resources to OSV impacts. See Attachment A at 4-5, 10, 13.</i></p> <p>Response: On the BDNF the wolverine is the animal most associated with concerns about climate change. USFWS (2013d) identified that the best scientific evidence shows that wolverine use deep persistent snow for denning and that climate change can lead to loss of spring snowpack. However, the USFWS also found that the best scientific information available does not substantiate recreational activities as a threat to wolverines. The BDNF Forest Plan requires monitoring of management activities in protecting high elevation winter habitats for wolverine. This monitoring will continue. See comment 99-34 discussing the reduction of wolverine denning areas open to OSV travel from 64% to 31% in Alternative 6 Modified. See also the FSEIS and Wildlife Report.</p>
100-48	<p><i>We are concerned that the Forest Service’s failure to adequately consider the impacts of the proposed action pursuant to NEPA prevents meaningful public comment. The SEIS, as written, does not provide the necessary hard look at the direct, indirect and cumulative impacts of OSV use.</i></p> <p>Response: Your concern about the adequacy of analysis in the SEIS is noted. We assume the claim the SEIS fails to provide the necessary hard look and prevents meaningful public comment is based on comments provided by this reviewer. Please refer to specific responses to comments in Letter 100.</p>
100-49	<p><i>...the Forest Service’s duty to apply the minimization criteria is a substantive requirement. It is insufficient to simply provide additional explanation and analysis in an attempt to justify the same decision. Rather, the agency must go</i></p>

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	<p><i>back and meaningfully apply and implement the criteria to show how each distinct, specifically-delineated area and any designated routes have been located with the objective of minimizing impacts...The TMR requires the Forest Service to consider the effects on listed minimization criteria “in designating National Forest System trails and areas.” 36 C.F.R. 212.55(b). Applying the minimization criteria “to areas remaining open to OSV use,” SEIS at 6, fails to comply with the District Court’s order, the TMR, and E.O. 11644... The agency’s real work occurs when the agency identifies the trails and areas to be opened to OSV use—that is when the agency considers the minimization criteria. The Forest Service must analyze and minimize impacts associated with designating existing OSV routes that have not previously been subject to NEPA or the minimization criteria. Because the 2009 OSV designations were not made in compliance with the TMR and E.O. 11644, the Forest Service may not rely on them as a baseline for this analysis. To the extent that the Forest Service attempts to rely on 36 C.F.R. § 212.81(b), that reliance is misplaced because previous OSV designations on the BDNF failed to comply with the TMR and E.O. 11644.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-50	<p><i>Proper application of the minimization criteria requires the Forest Service to get out on the ground, gather site-specific information, and apply the criteria to minimize resource damage and user conflicts associated with each designated area and route. See, e.g., Idaho Conservation League, 766 F. Supp. 2d at 1074-77...Far from providing a site-specific analysis, here the Forest Service approaches the minimization criteria on the thousand-foot level, looking at percentages of landscapes open or closed to OSV use. As noted above, the Forest Service also improperly downplays the impacts from OSVs and ignores studies demonstrating OSV impacts. Absent consideration of site-specific information and the best available scientific information, it is unlikely that the agency can demonstrate how its OSV area and route designations minimized impacts to particular resources.</i></p> <p>Response: The SEIS does provide a specific analysis looking at each landscape and site-specific areas where issues were raised. The Forest Service obtained information from studies, from our site-specific on-the-ground knowledge and from the on-the-ground knowledge of each MFWP area biologist. Please see the SEIS and the project file.</p>
100-51	<p><i>The SEIS does not provide the necessary site-specific analysis to designate snowmobile trails. Instead, the Forest Service discusses the minimization criteria in broad fashion. It refers generally to OSV routes in its description of each of the landscapes. See, e.g., SEIS at 28-30, 61 (“there are some routes”). We know</i></p>

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	<p><i>that specific OSV routes exist, based on previous information from the agency. See, e.g., Attachment E1. But the Forest Service provides no assessment of how the OSV routes and areas in each landscape were designated to minimize impacts. Instead, it just compares percentage of the landscape open or closed to OSV use. It says “[f]or the effects of OSV routes delineated in the Forest Plan, refer to the 2012 SEIS and Determination.” SEIS at 92. The Forest Service designated 1,904 miles of snowmobile routes in the 2012 ROD. But as noted above and in our 2012 comments, the agency only analyzed three OSV routes in the 2012 SEIS. See August 31, 2012 Comments from Wildlands CPR, Montanans for Quiet Recreation, and Friends of the Bitterroot (Attachment L). The 2012 SEIS makes no attempt to analyze the other routes or areas on the BDNF with any degree of specificity. In addition to the landscape-scale impacts, the agency must also assess and minimize site - specific impacts to soils, vegetation, water, and other public lands resources, sensitive wildlife habitat, and areas important for non-motorized recreation.</i></p> <p>Response: The SEIS provides specific analysis looking at each landscape and site-specific areas where issues were raised. This included taking into account, within all areas open to OSV use, all effects on resources specific to the minimization criteria of OSV use on routes (groomed or ungroomed) in these open areas. The Forest Service obtained information from studies, from our site-specific on-the-ground knowledge and from the on-the-ground knowledge of each MFWP area biologist. As such, the analysis of effects on resources of OSV use in open areas include the effects of OSV use of routes within these open areas. This approach is supported by the OSV travel management rule which recognized that in areas of the country OSV use is not confined to roads and trails and that it was appropriate to designate areas for cross-country OSV use. 80 FR 4501, 4506. The final rule also states on this issue: “The Department believes that if any area is analyzed appropriately under NEPA for OSV use utilizing the criteria established in the final rule (§§212.55 and 212.81(d)), there is no need for additional analysis to evaluate effects of OSV use on specific trails in that area, which are typically covered by snow.” 80 FR 4508. Here, our analysis, including our specific on-the-ground the knowledge of effects of OSV use in open areas includes consideration of the use of routes in these areas. The SEIS provides a maps of the OSV routes. Please also see response to comment 99-9.</p> <p>We would also like to clarify that the Forest Service did not designate 1,904 miles of snowmobile routes in the 2012 ROD. Rather, in response to the court order, the Forest Service’s 2012 ROD applied the minimization criteria to the three specific routes designated for snowmobile use, which occur within areas closed to snowmobile use. All other snowmobile “routes” on the BDNF are within areas open to snowmobile use where, as such, snowmobiles are not restricted to a particular travel way or route in these areas. The 1,904 mileage</p>

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	<p>figure in the comment is found in Table 90 of the 2009 FEIS (pg., 357). This table displays roads open to wheeled motorized vehicles. If the road is physically passable by a wheeled, motorized vehicles (not blocked by snow) it is open to that use. The mileage figure does not represent designated snowmobile routes.</p>
100-52	<p><i>The BDNF must apply the minimization criteria to each designated trail (whether existing or proposed, groomed or ungroomed). When designated and placed on a map, trails focus the impacts of OSV use to those locations and generally increase the number of OSV users visiting an area. This is particularly true of groomed trails within areas otherwise open to cross-country travel. Groomed trails are desirable for traveling faster and further into remote areas.</i></p> <p>Response: The SEIS provides specific analysis looking at each landscape and site-specific areas where issues were raised. This included taking into account, within all areas open to OSV use, all effects on resources specific to the minimization criteria of OSV use on routes (groomed or ungroomed) in these open areas. In so doing, the SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria. Please see also response to comment 99-9 and 100-51.</p>
100-53	<p><i>In addition, grooming often results in widening the footprint of a trail. The widened trail is then used in the summer (or sometimes even in the winter, by wheeled motorized vehicles resulting in additional impacts and conflicts.</i></p> <p>Response: The FSEIS describes grooming as a necessary practice because mounds and dips known as moguls are caused by passing snowmobiles, similar to the formation of “washboards” on gravel roads. Groomed trails on the BDNF are generally located on Forest Service roads and trails, and the width that the snowmobile trails are groomed is dictated by the development level and widths of the underlying roads. Winter trails are periodically maintained during the non-snow season in order to meet management objectives and standards, which include clearing widths consistent appropriate for winter grooming. There has not been any indication on the BDNF that widening of trails by snowmobile grooming is occurring, as grooming is done only on existing cleared pathways. Nor any indication of claimed groomer-widened trails being used by wheeled motorized vehicles.</p>
100-54	<p><i>Moreover, the impacts associated with OSV use on designated trails extend beyond the trail corridor itself. As part of applying and implementing the minimization criteria, the Forest Service must address noise, air quality, habitat fragmentation, and other landscape-scale impacts associated with OSV trail use. This is especially important where proposed designated trails are adjacent to or in close proximity to designated Wilderness or other important</i></p>

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	<p><i>conservation or recreational areas closed to motorized uses, since these designations may facilitate trespass into those areas.</i></p> <p>Response: The SEIS addresses impacts including noise, air quality, and habitat impacts at the landscape scale of impacts associated with OSV route/trail use. Please see the FSEIS and response to comments 99-9, 100-51 and 100-52. In response to the issue of incursions, please see response to comments 25-1 (Mt. Jefferson) and 100-12 (other recommended wilderness areas and wilderness areas).</p>
100-55	<p><i>The Forest Service should make its route designations based on BMPs, including (1) locating designated routes away from high-value and sensitive resource areas; (2) not exceeding motorized route density thresholds based on best available scientific information in suitable habitat for relevant wildlife; (3) locating routes to maintain large un-fragmented, undisturbed, and connected blocks of habitat where OSV use is prohibited; (4) allocating unplowed roads fairly between designated OSV routes and non-motorized routes; (5) where necessary to designate OSV routes through non-motorized areas, locating and managing routes to minimize disturbance by imposing speed and idling limitations and ensuring that use is restricted to the trail itself; and (6) locating routes designated within open areas—especially groomed routes—to minimize environmental damage and conflicts with other recreational uses. See Attachment A.</i></p> <p>Response: Please see response to comments 100-51 and 100-52.</p>
100-56	<p><i>In addition to limiting snowmobiles to designated routes, another way to minimize impacts is to close designated areas or trails when there is inadequate snowfall. Attachment A at 14. Snow in higher elevation areas is susceptible to wind movement—which can leave bare or thinly covered areas that would be difficult or impossible to avoid given the speed of snowmobiles. Plant communities, biodiversity and water quality in higher elevation shallow-soil ecosystems may be extremely vulnerable to soil or vegetation disturbance. The impact of a pioneered trail or other disturbance can extend well downslope of the disturbed area, and adversely affect plant communities, biodiversity and water quality. Fragile vegetation in higher elevations needs protection against such use, since impacts to fragile vegetation may be irreversible. Pursuant to National Best Management Practices, the Forest Service must consider a minimum snow depth to protect underlying vegetative cover and soil or trail surface...Despite its own guidance, the science showing the importance of snow depth in minimizing impacts, and its reliance on sufficient snow cover as a mitigating factor, the Forest Service does not impose a minimum snow depth. The Forest Service states “there is no indication of an existing or impending problem on the BDNF; users appear to be self-selecting the best snow.” SEIS 93. The agency must provide the data supporting this statement, as well as background information as to what the snowpack on the BDNF has looked like</i></p>

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	<p><i>over the last decade, whether there are trends or changes in snowpack, and how this might affect the Forest Service’s decision. The Forest Service fails to discuss typical snow depths on the forest, other than in conclusory statements about “low snow depth”... Failing to apply a minimum snow depth to ensure OSV impacts are mitigated by snow cover defies logic and science. This is especially true where the agency is relying on snow cover to mitigate impacts to soil and vegetation...The best available science shows that minimum snow depths should be at least 18 inches for cross-country travel and 12 inches for travel on groomed trails. Attachment A at 14 (Inyo, Sequoia, and Sierra National Forests proposing a minimum snow depth standard of 18 inches in their revised forest plans to protect forest resources). The Forest Service must identify and impose a minimum snow depth, and address places to enforce those restrictions, including protocols for monitoring, communicating conditions to the public, and implementing emergency closures when snowpack falls below the relevant thresholds.</i></p> <p>Response: The “science” identified is related to the particular conditions on the Inyo, Sequoia and Sierra National Forests in central California. Please see responses to comments 99-14 and 99-50. OSV use on the BDNF in the presence of inadequate snow cover is not occurring to the extent we can geographically identify locations where there are impacts. The effects are negligible at best with any site-specific disturbance to vegetation unable to be detected after the snowmobile season.</p>
100-57	<p><i>We also suggest ending the snowmobiling season early enough to reduce potential snowmobile use in marginally snow covered areas that could result in damage to fragile vegetation.</i></p> <p>Response: As discussed in response to comment 100-57, OSV use on the BDNF in the presence of inadequate snow cover is not occurring to the extent we can geographically identify locations where there are impacts. Please also see responses to comments 99-38 and 100-26.</p>
100-58	<p><i>To minimize impacts to water quality, the Forest Service should avoid designating areas and trails in areas of the forest with important, sensitive or impaired resources. Attachment A at 14. These areas may include water bodies, wetlands, riparian areas, meadows, and alpine habitat. One way to minimize impacts to water quality, soils, vegetation, and wildlife is to protect the areas with a buffer of at least 150 feet. Id.</i></p> <p>Response: Attachment A at page 14 referred to here is a document titled <i>Snowmobile Best management Practices for Forest Service Travel Planning</i>, by Winter Wildlands Alliance, 2014. Please see the SEIS water quality analysis and response to comments 99-47 and 100-59. The Forest Service has not found impacts relative to OSV use and water quality.</p>
100-59	<p><i>The Forest Service should also avoid designating areas or trails with water crossings. The map in Attachment E1 seems to show various OSV routes that run</i></p>

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	<p><i>directly along and cross streams in the West Pioneers WSA. The 2009 Revised Forest Plan identified parts of Mt. Jefferson and the West Big Hole as “[k]ey areas” with watershed conditions susceptible to impacts. 2010 Record of Decision, page 3. But the Forest Service allowed winter motorized recreation, claiming the “watershed conditions . . . are more susceptible to impacts by wheeled vehicles than over-snow vehicles.” Id. The Forest Service has yet to show how it designated OSV routes and areas with the objective of minimizing impacts to water quality.</i></p> <p>Response: Attachment E1 in the DEIS is a map of Lynx Habitat. Concerning water quality and water crossings, please see response to comments 99-47 and 99-49. Forest Service has not found impacts relative to the issue of OSV stream crossings, which occur during frozen conditions.</p>
100-60	<p><i>The Forest Service must manage Recommended Wilderness to preserve and protect its suitability for wilderness designation.</i></p> <p>Response: Recommended wilderness areas are closed to OSV use in all alternatives, except Alternative 1. Please also see the analysis of the 2009 FEIS and ROD.</p>
100-61	<p><i>Recommended Wilderness in the BDNF includes the Sapphires, Anaconda-Pintler, Electric Peak, the north half of the Mt. Jefferson area, and East Pioneers. These areas are, and should remain, closed to OSV use. We urge the Forest Service to restrict OSV use in areas surrounding and adjacent to RWAs because the increase in capability and popularity of motorized vehicles will put increased pressure on RWAs unless those uses are restricted. Furthermore, the continuing or expanding use of vehicles will do nothing but reduce the chances of these neighboring areas being designated as Wilderness.</i></p> <p>Response: Recommended wilderness areas (RWAs) are closed to OSV use in all alternatives, except Alternative 1. It is unclear what the reviewer means by stating OSV use in areas surrounding and adjacent to RWAs “will put increased pressure on RWAs.” The Forest Service closure of RWAs is being enforced.</p>
100-62	<p><i>To the extent the Forest Service decides not to close OSV use in IRAs or WSAs, it must analyze and minimize the impacts of OSV use on these areas...A map from the 2009 Corrected FEIS shows extensive overlap between OSV designations and Wilderness Study Areas. 2009 Corrected FEIS at 74 (excerpt provided as Attachment N).</i></p> <p>Response: Please see responses to comments 100-41 and 100-84 and the SEIS analysis.</p>
100-63	<p><i>Areas surrounding designated wilderness, or that provides critical habitat connectivity, should also be closed to OSV use.</i></p> <p>Response: The big game, grizzly bear, Canada lynx and wolverine analyses have been updated in the FSEIS. Additionally please see the responses to comments 32a-5, 99-35, 100-17, 100-19.</p>

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100-64	<p><i>The Forest Service should protect the following IRAs and WSAs by not designating OSV routes or areas in: Electric Peak, West Big Hole, East Pioneers, Mt. Jefferson, the IRA surrounding the Anaconda-Pinter RW, the West Pioneers, and the Sapphires.</i></p> <p>Response: The BDNF believes that closure of areas to motorized use is not the only solution to avoiding conflict or maintaining the wilderness potential of IRAs or WSAs. Assessments of the West Pioneer and Sapphire WSAs, for example, concluded that when comparing changes between 1977 and 2002 (West Pioneers) or 2005 (Sapphire Mountains), neither the wilderness character of the area nor the potential for inclusion in the National Wilderness Preservation System has diminished when looking at the WSA as a whole (2009 FEIS pg. 428). Although site-specific changes in resource conditions have occurred, overall the wilderness character of the study areas, as defined by the Wilderness Act, has not diminished. Motorized use in place prior to 1977, as established by Wilderness Characteristic Assessments completed in 2003 and 2006, may continue as allowed by law (2009 FEIS pg. 433). Please see response to comment 25-1 pertaining to Mt. Jefferson. Additional discussion of OSV use on wilderness characteristics and wilderness potential of WSAs is included in the FEIS.</p>
100-65	<p><i>We encourage the BDNF to include adequate restrictions on motorized uses in remaining roadless and wilderness study areas to protect the pristine characteristics of such areas.</i></p> <p>Response: Please see the response to comment 100-64.</p>
100-66	<p><i>Any travel management decision by the Beaverhead-Deerlodge should maintain consistency with the management decisions made for the Bitterroot national Forest. In the 2015 Travel Management plan the Bitterroot closed the Sapphire Wilderness Study Areas to all motorized use to minimize impact to elk and elk habitat... The BDNF should likewise close the Sapphires Wilderness Studies [sic] Areas and adjacent areas to OSV use to minimize impacts to elk and elk habitat.</i></p> <p>Response: The SEIS and draft ROD have taken into consideration the decision proposed by the Bitterroot National Forest in its travel management ROD regarding the Bitterroot National Forest portion of the Sapphire Mountains Wilderness Study Areas.</p>
100-67	<p><i>Forest Service’s reliance on Montana’s statutory definition of “harassment” is misplaced... Without explanation, the Forest Service appears to assume that the state of Montana’s understanding of the term “harassment,” and local wardens’ enforcement of the state prohibition on harassment, equates to the harassment referred to in the 2005 TMR. There is no basis for concluding that the state of Montana’s use of the term “harassment,” or local wardens’ interpretation of that term, is synonymous with the Forest Service’s regulation and Executive Orders requiring federal agencies to minimize harassment of wildlife. In fact, federal use of the term “harassment” is likely much broader</i></p>

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	<p><i>than under Montana state law. The ESA defines “take” as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” 16 U.S.C. § 1532; 50 C.F.R. § 10.12. The U.S. Fish and Wildlife Service defines “harass” in its regulations as “to disturb, worry, molest, rally, concentrate, harry, chase, drive, herd or torment.” 50 C.F.R. § 19.4. This definition lacks the intent component found in Montana’s state laws. See SEIS at 32 (explaining that Montana state law prohibits “use [of] the snowmobile for the purpose of driving, rallying, or harassing game animals”). Under the federal definitions, interfering with feeding, breeding, or sheltering would certainly count as harassment. Indeed, merely disturbing or worrying wildlife would also count as harassment. The Forest Service needs to revise its analysis in light of this broader understanding of harassment that is consistent with federal law.</i></p> <p>Response: The statement about harassment was an attempt to identify that harassment of wildlife by snowmobile is already illegal in the state of Montana and the scale of wildlife being illegally pursued/harassed by people on OSVs under Montana law as known by the MFWP.</p> <p>The reviewer selected definitions of harass from Endangered Species Act regulations sections 50 C.F.R. 19.4 and 50 C.F.R. 17.3. However, the regulation 50 C.F.R. 19.4 definition of harass applies to airborne hunting. In terms of management activities, the term harass is defined in 50 C.F.R. 17.3, which the reviewer has not quoted and which incorporates the threshold of significantly disrupting wildlife behavior. As stated in the regulations, “Harass ... means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding, or sheltering.” 50 C.F.R. 17.3. However, the analysis does include analysis of all potential for disturbance in terms of harassment of wildlife on a site-specific and landscape level scale. See updated FSEIS.</p>
100-68	<p><i>The SEIS fails to show how it designated the routes and areas in the six alternatives with the objective of minimizing harassment of wildlife and significant disruption of wildlife habitats. It refers to the 2009 FEIS, which summarily stated the “allocations are designed to protect low elevation winter range for deer, elk, and moose; protect high elevation secure habitat for mountain goat and wolverine,” and “provide quiet winter recreation opportunities.” SEIS at 10. NEPA requires the disclosure of the underlying data for these types of conclusory statements. The SEIS in no way explains how the route and area designations under each alternative were designed with the objective of minimizing impacts.</i></p> <p>Response: Please see responses to comments 99-9 and 99-10 and the updated big game and wolverine sections in the SEIS.</p>
100-69	<p><i>For example, for grizzly bear the agency merely compares the percent of each</i></p>

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	<p><i>landscape allocated open to OSV use under each of the alternatives and the potential impacts on grizzly bear. SEIS at 99-127. This analysis consistently attempts to discount impacts to grizzly bear based on Recovery Plan conservation areas, implying that the Forest Service need not worry about minimizing impacts to grizzly bears outside of designated conservation areas or wilderness. The minimization criteria make no such distinction. But more importantly, nowhere does the analysis attempt to explain how the OSV designations under each alternative were designated with the objective of minimizing impacts to grizzly bears. This approach fails to provide “some discussion, beyond conclusory statements, as to how the Forest Service’s decisions were made ‘with the objective of minimizing’ the effects of the program’s uses.” Friends of the Clearwater, No. 3:13-CV-00515-EJL, 2015 U.S. Dist. LEXIS 30671 (D. Idaho Mar. 11, 2015).</i></p> <p>Response: The analysis does disclose how alternatives, with different levels of open and closed areas, are designed to reduce impacts from OSV use by landscape and site-specifically. In addition to areas open and closed across the Forest, the Draft SEIS also analyzed grizzly bear denning habitat and the potential for disturbance across the entire forest (by landscape and by alternative), including areas inside and outside wilderness and recovery areas. Please see the DSEIS grizzly bear section starting on page 97. Additionally please see responses to comments 99-10 and 99-29. The effects section for grizzly bears in the FSEIS has been updated to incorporate additional information. The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-70	<p><i>The SEIS notes that grizzly bears are present in the Madison and Gravelly landscapes. The Forest Service also acknowledges that “[a]reas of regular OSV use are found in the Big Hole, Pioneer and Gravelly Landscapes” in addition to “certain areas near roaded access in the Tobacco Root, Boulder River, Clark Fork Flint and Upper Rock Creek Landscapes.” SEIS at 24. Yet the Forest Service makes no attempt to explain how the OSV routes and areas in the Gravelly landscape were designated so as to minimize the impacts to grizzly bears in that region, especially given their regular OSV use.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-71	<p><i>The Madison and Gravelly landscapes are the only landscapes where grizzly bear</i></p>

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	<p><i>are known to occur consistently on the BDNF, but the Forest Service should also recognize the growing grizzly bear populations outside of conservation areas and consider how to designate OSV routes so as to minimize impacts to grizzly bear anywhere on the BDNF. The Forest Service notes that most of the Landscapes have had an unconfirmed grizzly bear sighting. SEIS at 100. The BDNF recognized the importance of managing human access as one of the most influential parameters affecting grizzly bear habitat security. 2009 Corrected FEIS, Appendix B, Revised BE at 48. Limiting open motorized route density is a key management action the Forest Service must use to increase grizzly bear habitat security and minimize impacts from OSV use. Attachment A at 10.</i></p> <p>Response: In reference to grizzly bears, it was acknowledged in the effects for grizzly bears section of the DSEIS (starting on page 97) that there could be effects to individuals. The Forest consulted with USFWS on grizzly bear for activities in the Forest Plan, including OSV travel. There was no requirement from USFWS to further reduce OSV travel. The effects section for grizzly bears in the FSEIS has been updated to incorporate additional information. Please see response to comment 99-10, 99-29.</p>
100-72	<p><i>Due to the presence of this listed species and suitable habitat within the BDNF, as well as the potential adverse effects of OSV travel, the Forest Service must avoid lynx habitat when designating areas and trails for OSV use. It is unclear how the proposed OSV route and area designations will “maintain[] all existing habitat connectivity in all LAUs and linkage area across all landscapes on the BDNF.” SEIS at 128. The same goes for how proposed OSV route and area designations will meet Guideline HU G3 and Guideline HU G11. SEIS at 128-129. Perhaps it is because the Forest Service impermissibly relies on the claim that “[n]one of the alternatives change existing designated routes or designated play areas.” SEIS at 129. Consistent with the Ninth Circuit Court of Appeals decision, the purpose of the SEIS should be to designate OSV routes and areas so as to minimize impacts to species such as lynx. The Forest Service may not claim that the designations exist (particularly given that they were invalidated by the Ninth Circuit), and therefore it does not have to analyze or minimize the impacts of those designations. Plus, because the SEIS impermissibly discounts impacts to lynx and ignores best available science showing impacts (see section three, above), the Forest Service has no basis for its determination that “all alternatives result in low potential impacts.” SEIS at 129.</i></p> <p>Response: There is no direction that states lynx habitat must be avoided when designating areas and trails for OSV use. As the response to comment 99-35 states, the existing condition (Alternative 1) was included as part of the baseline analysis for the Lynx Conservation Assessment Strategy (2000) and the subsequent NRLMD. This direction was consulted on with USFWS. The NRLMD standards and guidelines direct actions since consultation on the baseline. The discussion on pages 128-129 is quite clear on how all alternatives meet</p>

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	<p>Standard ALL S1, Guideline HU G3 and Guideline HU G11. The reviewer seems to have a misunderstanding on how to apply the NRLMD direction. Additionally, as stated on page 129, Tables 1- 11 display areas open to OSV travel by Landscape and by Alternative show through a reduction of acres open to OSV travel, fewer potential impacts to lynx from Alternatives 2, 3, 5 and 6 Modified. However, regardless of alternative, the Forest Service has not identified any discernible effects to lynx from OSV use. Additionally, please see the updated lynx section in the FSEIS.</p>
100-73	<p><i>Perhaps worse than the glaring faults in the analysis of OSV impacts to lynx and lynx habitat, the Forest Service makes no attempt to show how it designated OSV routes and areas under each of the alternatives so as to minimize impacts to the species. In contrast to the “percentage of landscape” approach the agency took for grizzly bear, wolverine, and big game, for lynx the agency takes an even more generalized approach by considering lynx and lynx habitat across the entire forest.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria. Please see the response to comment 100-72.</p>
100-74	<p><i>Similar to its approach for grizzly bear, for wolverine the agency again merely compares the percent of each landscape allocated open to OSV use under each of the alternatives and the potential impacts on wolverine. SEIS at 131-151. This fails to show how the Forest Service designated OSV routes and areas under each alternative with the objective of minimizing impacts.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in the designing of the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p>
100-75	<p><i>The Forest Service must protect the areas identified in section three, above, as important for wolverine from the noise and physical disruption of OSV use as part of the Forest Service’s duty to minimize impacts. OSV use is not compatible with maintaining adequate security for wolverine reproductive dens. See, e.g., Inman et al. 2007. Specific areas of potential wolverine denning habitat that are likely to see reduced security due to OSV use and should therefore not be designated for motorized use to minimize impacts include:</i></p> <ul style="list-style-type: none"> • <i>East Pintler Recommended Wilderness – in particular, Tenmile, Twelvemile, and Sullivan Creeks should be protected. Designated wilderness in the upper part of Sullivan Creek is also vulnerable to unauthorized OSV use.</i>

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	<ul style="list-style-type: none"> • <i>East Pioneers</i> • <i>West Pioneers - wolverine denning habitat exists along the northeast and southwest margins of the Wilderness Study Area. Attachment E1.</i> • <i>Hellroaring Drainage</i> • <i>West Big Hole</i> • <i>Lima/Tendoy</i> <p>Response: Thank you for your recommendation. Please see the response to comment 99-34.</p>
100-76	<p><i>The DEIS indicated increased snowmobile use has displaced wolverines in high mountain basins. 2009 Corrected FEIS, page 113. Montana Department of Fish, Wildlife & Parks noted in its comments on the 2009 Revised LMP that stress and displacement from cirque bowels may be playing a role in wolverine population declines. The Forest Service should consider not designating OSV use on Trask, Goat Mountain, Meadow, and Dolus Lakes to minimize impacts because these high cirque basins provide spring snow cover and security crucial for wolverine persistence and reproduction. It should also consider not designating OSV use in the upper basins of Big Gulch and Barker Creek.</i></p> <p>Response: It is unclear exactly which document this reviewer is referencing. Page 113 of the 2009 FEIS discusses aquatic resources. The DSEIS on page 113 discusses grizzly bear habitat. However, for this DSEIS analysis the Forest Service obtained more recent comments from MFWP Carnivore Coordinator Bob Inman who stated that there is no evidence that OSV use is having negative effects on wolverine populations. Please see responses to comments 99-10, 99-32, 99-33, and 99-34. Concerning the particular areas you recommend for closure Trask, Goat Mountain, Meadow, and Dolus Lakes are closed in Alternative 6 modified.</p>
100-77	<p><i>Given the need for connected habitat conditions in the more southerly regions of the wolverine’s range, the Forest Service should consider alternative OSV designations that do not fragment this habitat. For example, the Mount Jefferson Roadless Area, in combination with the Centennial Recommended Wilderness Management Area and Hellroaring Creek drainage, likely function as a local travel corridor that should not be split by OSV designations.</i></p> <p>Response: We have no evidence that the Mount Jefferson roadless area identified in this comment is a specific corridor for wolverine although the BDNF is identified in Inman 2013 as being within the “Central Linkage Region”. The science (Inman 2013) discusses connectivity at the population level scale and his recommendation is that incentives be developed for retaining private land in a state that facilitates movement. There are no specific recommendations related to particular areas on the BDNF. Additionally, the USFWS Proposed Rule acknowledged that while dispersed recreation may affect wolverines, significant effects to wolverines from winter recreation</p>

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	<p>remain to be demonstrated scientifically (USFWS 2013d). Also please see the response to comment 99-10.</p>
100-78	<p><i>The Forest Service should start its analysis by determining how much of the areas and routes proposed to be open to OSV use under each alternative have actually been used by snowmobiles. See 2009 Corrected FEIS, Appendix B, Revised BE at 99 (acknowledging that "... snowmobile use may not currently be established in many areas where [wolverine] denning habitat exists"). If only a fraction of the historically open areas have been used by OSVs but the Forest Service decides to maintain these designations and the scope of OSV use increases, then habitat security will decline as compared to existing levels. As emphasized above, the Forest Service has a duty to minimize the effects of its designations, not just a percentage of acres in a landscape.</i></p> <p>Response: As stated in the DSEIS on page 33, an over the snow vehicle use map was created by the Forest recreation specialists on the forest and was used in the effects analysis for all species. This map represents their repeated observations of on-the-ground use for numerous years. The DSEIS on page 32 acknowledged that use may increase in areas where currently there is no use. The analysis considered these places in the open area calculations.</p>
100-79	<p><i>The Forest Service fails to explain how it designated OSV routes and areas to minimize impacts to mountain goats. Instead, it analyzes which alternative provides the best protection from OSV use. See SEIS at 33-44, 48-92, 97. Even for the most protective option, Alternative 3, the agency recognizes that "some mountain goat winter range remains open to winter motorized travel which could cause disturbance and displacement of mountain goats." Id. Yet the Forest Service makes no attempt to describe the location of OSV routes or areas designated under Alternative 3, the location of mountain goat winter range, or to explain how the OSV designations were chosen so as to minimize impacts to mountain goats. As for other wildlife, here, too, the Forest Service discounts impacts to mountain goats by stating "there are no known cases of conflict with mountain goats as a result of winter recreational activities on the BDNF." SEIS at 97. It appears there have been no studies to confirm or support these general assertions. NEPA requires more, and the Forest Service should disclose the basis for these statements.</i></p> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p> <p>Please see responses to comments 7-1, 99-10, 99-16, 100-20 and 100-21 regarding mountain goats.</p>
100-80	<p><i>The Forest Service fails to explain how it designated OSV routes and areas to minimize impacts to big game. (Instead it analyzes which alternatives provide</i></p>

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	<p><i>the best protection from OSV use). See SEIS Corrected FEIS at 537, 487. The Forest Service must identify the areas and routes designated for OSV use in each landscape in relation to big game winter range to identify where OSV use is likely to impact wildlife and disrupt wildlife habitat. Based on this information, the Forest Service must designate OSV use with the objective of minimizing those impacts. See Attachment A at 12.</i></p> <p>Response The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria.</p> <p>Please see responses to comments 99-10, 100-23, 100-24 regarding big game other than mountain goats.</p>
100-81	<p><i>The Forest Service should close deer and elk winter range to OSV travel. At a minimum, OSV travel within deer and elk winter range should be limited to designated routes to minimize impacts. Attachment A at 11 (noting a 2014 study that highlights the importance of limiting the duration and spatial footprint of winter recreation disturbance to protect ungulates). Important ungulate habitat that the Forest Service should close to OSV use includes:</i></p> <ul style="list-style-type: none"> • <i>South Fleecer and North East Fleecer - As an island of national forest, protecting wildlife habitat in this area is especially important. Because it is not close to other national forest areas, wildlife cannot disperse away from OSV use disruptions.</i> • <i>East half of the management area in Upper Ruby, north of Burnt Creek</i> • <i>East part of Hells Canyon</i> • <i>Entire eastern half of the Meadow Creek Management Area</i> <p>Response: The MFWP has identified only two areas of concern for harassment and disruption of big game habitat – for elk and moose in the Boulder Landscape and moose in West Fork of the Madison in the Gravelly Landscape. No other areas have been identified and none for deer. Please see response to comment 99-10.</p>
100-82	<p><i>The Forest Service must designate the OSV routes and areas in the regions identified in section three in a way that minimizes impacts to moose and riparian areas that provide moose forage. Given the evidence of cross-country OSV use in the Boulder River-Sheepshead Management Area, the Forest Service should clearly limit OSV use to those designated routes, or consider closing areas that are problematic for enforcement to minimize these impacts.</i></p> <p>Response: Based on previous comments from MFWP, Alternative 6 Modified incorporated additional area closures in big game winter range in the Boulder River-Sheepshead Management Area to minimize potential disturbance/displacement/harassment of elk and moose from OSV travel on</p>

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	the winter range. Please see response to comment 100-24.
100-83	<p><i>OSV designation decision should also minimize impacts to small mammals that serve as prey for these carnivores.</i></p> <p>Response: Please see response to comment 100-25.</p>
100-84	<p><i>The Forest Service must consider not designating routes or areas for OSV use in recommended wilderness or WSAs. Current Forest Service Manual direction requires that the Forest Service manage recommended wilderness and WSAs so as not to reduce wilderness potential or compromise wilderness values. Specifically, the direction states:</i></p> <p><i>Any inventoried roadless area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of the area.</i></p> <p><i>Activities currently permitted may continue pending designation, if the activities do not compromise the wilderness values of the area.”</i></p> <p><i>Forest Service Manual 1923.03. See also 36 C.F.R. § 219.10(b)(1) (2012) (LMPs must include standards and guidelines that provide for “management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.”). Management decisions that allow motorized use in recommended wilderness or WSAs in LMPs can result in damage to the wilderness potential of these areas.</i></p> <p>Response: This comment concerns both recommended wilderness areas and Wilderness Study Areas (WSAs). Recommended wilderness areas are closed to OSV use in all alternatives, except Alternative 1. There are two WSAs on the BDNF – the West Pioneers and the Sapphire Mountain WSA. Under Alternative 6 Modified the West Pioneers WSA is open to OSV use. For the Sapphire Mountain WSA on the BDNF 22% is open to OSV use in Alternative 6 Modified. Forest Plan p. 260-261. Trail grooming ceased in the West Pioneers as part of a settlement agreement in December 2009, as such there are no groomed OSV trails in either WSA. Please also see response to comment 100-41.</p>
100-85	<p><i>Designating motorized use in recommended wilderness or WSAs reduces wilderness potential and compromises wilderness values. Noise, air quality, viewshed, and other impacts associated with OSV use can greatly diminish the experience of non-motorized users. See Attachment A at 5-8. Areas of high value for non-motorized winter recreation should be closed to OSV travel. These areas may occur across all Recreation Opportunity Spectrum categories, including roaded natural, rural, and urban areas that may have a wholly different character in the winter and provide excellent winter recreation opportunities.</i></p> <p>Response: Recommended wilderness areas are closed to OSV use in all alternatives, except Alternative 1. Analysis of effects of OSV use on the BDNF</p>

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	Sapphire Mountain and West Pioneers Wilderness Study Areas (WSAs) are included in the SEIS. Please see responses to comments 100-84 and 100-41 discussing WSA analysis. Please also see responses to comments 100-7, 100-42, 99-43, 99-47, 100-30 and 100-31 in terms of consideration of noise and air quality.
100-86	<p><i>Where there is evidence of conflict among uses, within recommended wilderness, WSAs, or anywhere else on the BDNF, the Forest Service must designate OSV routes and areas so as to minimize those conflicts. The Forest Service recognizes Mount Jefferson, in the Gravelly Landscape, is area of historic conflict and even cites to evidence presented by Montana Wilderness Association, Greater Yellowstone Coalition, and Winter Wildlands Alliance demonstrating the adverse impacts that have resulted from illegal motorized use in this area. SEIS at 156. But the Forest Service turns a blind eye its duty to show how it designated the OSV routes and areas in that region with the objective of minimizing conflicts between uses. Rather, the agency states mitigation that will occur “[i]f monitoring reveals that non-compliance is an issue.” SEIS at 156. There are three major problems with this response. First, it ignores the preceding paragraph identifying evidence of non-compliance and conflict of use. The BDNF’s LMP requires the Forest Service to take additional steps based on this new information. Second, it confuses mitigation with the TMR requirement to minimize conflicts at the time routes and areas are designated. Exec. Order No. 11644, § 3(a) (“Areas and trails shall be located to minimize” impacts to natural resources, wildlife, and conflicts among uses); 36 C.F.R. §§ 212.51(a)(3), 212.55(b).</i></p> <p>Response: Please see the SEIS which provides additional discussion relating to incursions into the portion of the Mt. Jefferson closed to OSVs and compliance efforts undertaken. Please also see responses to comments 25-1 and 99-18.</p>
100-87	<p><i>Finally, to the extent the Forest Service attempts to mitigate conflicts by relying on monitoring, it must provide for details for its monitoring plan. CEQ’s NEPA regulations indicate that “a monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation” in the Record of Decision. 40 C.F.R. § 1505.2(c). The rules go on: “agencies may provide for monitoring to assure that their decisions are carried out and should do so in important cases, and upon request make available to the public the results of relevant monitoring.” Id. § 1505.3. The Forest Service should provide the results of any monitoring of conflicts on the BDNF.</i></p> <p>Response: Please see the SEIS which provides additional discussion relating to incursions into the portion of Mt. Jefferson closed to OSVs and compliance efforts undertaken. Please also see responses to comments 25-1 and 99-18.</p>
100-88	<i>The Forest Service also recognizes Chief Joseph Pass, in the Big Hole Landscape, as an area of potential use conflicts. SEIS at 156. Here, too, the agency makes no attempt to explain how it sought to minimize those conflicts when</i>

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	<p><i>designating OSV routes and areas for Chief Joseph Pass. Instead, the agency relies on mitigation through voluntary cooperation of the groups using that area. Voluntary cooperation is a great mitigation tool but it should be applied to further reduce impacts after areas and routes have been located to minimize conflicts in the first instance.</i></p> <p>Response: The SEIS does discuss that Chief Joseph Pass is an area of potential conflict between cross-country skiing and snowmobile use. However, the SEIS notes that efforts have been undertaken to avoid this potential conflict and Chief Joseph Pass is an example where cooperation has resulted in precluding use conflict. The BDNF believes that closure of areas is not the only solution to avoiding conflict.</p>
100-89	<p><i>For example, in the Antelope Basin MA, skiing and snowshoeing [sic] opportunities in a non-motorized setting is available on about 5,500 acres. But along the east edge of this non-motorized area is 4.6 miles of snowmobile trail. See, e.g., 2012 SEIS at 9. Plus, the 4.6 miles of snowmobile trail in the Antelope Basin MA is located on the Continental Divide National Scenic Trail, which is meant to be managed for non-motorized recreation. Yet the SEIS fails to explain how the Forest Service sought to minimize conflicts among uses due to noise and exhaust impacts when it designated OSV routes like this.</i></p> <p>Response: The requested information was analyzed and disclosed in the 2012 SFEIS (pg. 13-22).</p>
100-90	<p><i>To designate areas and trails in a way that minimizes conflicts among the various uses of the forest, the Forest Service must first identify routes and areas where there is ongoing conflict between motorized and non-motorized winter recreational use. Attachment A at 8. For example, Gibbons Pass and Highway 43 is an area with high demand for motorized routes and areas. Routes and areas of high value or demand for non-motorized recreation that should be closed to OSV travel include the Mt. Jefferson management area and the roadless and wilderness-quality lands identified above... The Forest Service should provide adequate buffers around important non-motorized areas and trails where OSV travel is prohibited to minimize noise and other impacts.</i></p> <p>Response: Please see the SEIS and response to comments 25-1 and 99-18 in terms of the Mt. Jefferson area and the Hellroaring drainage. Regarding the Gibbons Pass and Highway 43 areas, please see response to comments 99-55, 100-88, 199-3 and 199-4.</p>
100-91	<p><i>In addition, the Forest Service must address areas prone to conflicting use demands. OSV use in West Big Hole has increased as snowmobiles have become more powerful, expanding their range and allowing access to higher elevations. Mt. Jefferson area and Centennials Recommended Wilderness and IRA are also areas prone to a lot of conflict between motorized and non-motorized recreational uses. Increased OSV use in West Big Hole has amplified the disruption to non-motorized users. The forest should also consider closing</i></p>

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	<p><i>areas to OSV use where enforcement has proven to be ineffective. The Forest Service had said it would reevaluate if the area designations were violated. See WildEarth Guardians, 790 F.3d at 929 (noting the Forest Service “plans to re-evaluate its decision if noncompliance occurs.”). For example, the proposed boundary dividing motorized and non-motorized use in the Hellroaring Drainage is unenforceable and unworkable.</i></p> <p>Response: The Forest Service continues to take a variety of measures to address use conflicts. Please see the SEIS and responses to comments 25-1 and 99-18 in terms of the Mt. Jefferson area and the Hellroaring drainage. Regarding portion of the comment asserting that increased OSV use in the West Big Hole has amplified the disruption to non-motorized use, it is felt that overall OSV use has not necessarily increased (in numbers) in the West Big Hole. Snowmobiling has occurred in the Big Hole since the early development of snowmobiles in the late 1940s, 50s and 60s; however, the area remains as sparsely populated as it was during those decades. The West Big Hole area is located in Beaverhead County, which has 5,442 square miles, and a population of approximately 9,300 people (US Census: http://www.census.gov/quickfacts/table/PST045215/30001). Approximately 4,200 of those people live in Dillon, the county seat. As Montana’s largest county, Beaverhead County has one of the lowest populations, with 1.7 people per square mile. Wisdom, Montana has a population of approximately 115, and Jackson has a population of approximately 50 people. Wise River has a population of approximately 320 (http://www.bigholevalley.com). Larger communities outside of Beaverhead County such as Butte and Anaconda have declined in population since the 1980s, however, the Bitterroot Valley and Missoula areas have grown. Some winter recreationists to the West Big Hole come from these communities and areas. Although the small communities of the Big Hole do market to and accommodate winter recreationists, there is no indication that the West Big Hole is a major destination for overnight snowmobile tourism similar to other areas where this is the case. There is little lodging, restaurants or other accommodations in the area that would indicate increasing levels of such visitation. The same can be said for commercially guided services, as little to none have existed over the years. While the overall visitation may not be substantial, more skiers and snowmobilers are potentially accessing backcountry settings in the West Big Hole than historically may have occurred. Skiers and snowmobilers may therefore be encountering each other in the backcountry in the West Big Hole. Please also see response to comment 211-2. Discussions about Gibbons Pass and Chief Joseph can also be found in the DSEIS pg. 156-157 and response to comments 99-55, 100-88, 199-3, and 199-4.</p>
100-92	<i>The SEIS should also include an evaluation of and prescriptions for how the plan will be consistent with the land use plans for the nearby NPS-managed lands.</i>

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	<p><i>The SEIS should not only declare that the plan is consistent with these other plans, but should strive to manage the lands in conjunction with the standard of conservation that these Parks use. Special designations should be prioritized within the portions of the planning area that border Yellowstone National Park. Such designations include but are not limited to WSA, Non-WSA lands with wilderness characteristics, and designated and eligible Wild and Scenic Rivers.</i></p> <p>Response: The BDNF does not border lands managed by the National Park Service</p>
100-93	<p><i>Efforts to mitigate impacts associated with a designated OSV system are insufficient to fully satisfy the duty to minimize impacts, as specified in the executive orders and Travel Management Rule. See Exec. Order 11644, § 3(a) (“Areas and trails shall be located to minimize” impacts and conflicts) (emphasis added); 36 C.F.R. § 212.55(b) (“the responsible official shall consider...with the objective of minimizing” effects and conflicts) (emphasis added). To avoid conflating mitigation with minimization, the Forest Service should approach application of the minimization criteria in two steps. First, the agency should locate areas and routes in a way that seeks to minimize impacts. The agency should consider BMPs identified in the Winter Wildlands Alliance report, Attachment A. Only once the impacts have been minimized should the agency establish site-specific management actions to reduce or mitigate remaining impacts. Some important mitigation measures are addressed in Attachment A:</i></p> <ul style="list-style-type: none"> • <i>Encourage, incentivize, or require Best Available Technology for OSV noise and emissions controls, particularly in sensitive or high-conflict areas;</i> • <i>Where possible, designate separate trailhead, parking, and staging areas for OSV open areas and high-demand OSV routes, and locate those areas away from the high-value and sensitive resource areas described above. Separate motorized and non-motorized trailheads where possible in shared use areas;</i> • <i>Clearly identify season of use restrictions based on wildlife needs, water quality considerations, average snow depth figures, and other relevant information, with those restrictions serving as bookends, and minimum snow depth requirements;</i> • <i>Require snow depths of at least 12 inches for OSV travel on designated trails and at least 18 inches for off-trail OSV travel, or sufficient depth to protect water quality, soils, and vegetation. Minimum snow depths should be consistent throughout the region to avoid enforcement difficulties;</i> • <i>Ensure adequate design and maintenance of designed routes, including bridges, culverts, and roadbed to reduce hydrological erosion impacts</i>

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	<p><i>during spring run-off;</i></p> <ul style="list-style-type: none"> • <i>Restrict use by class or type of OSV as necessary to minimize impacts;</i> • <i>Provide public education and outreach;</i> • <i>Monitor and enforce closed routes and areas, seasonal restrictions, and minimum snow depths based on numbers reported regularly on the forest website, with measurements taken at established locations representative of varying snow depth based on factors like wind, orientation, slope, and tree cover.</i> • <i>Establish an adaptive management framework that uses monitoring to determine efficacy of current management.</i> <p>Response: The SEIS evaluates and considers data regarding the effects of OSV use on resources subject to the minimization criteria. The line officer, in the draft ROD, shows how she applied this data in designing the decision designating open OSV areas and routes with the intent of minimizing effects of OSV use on the relevant criteria. Many of the mitigation measures shown in Attachment A are incorporated into the alternatives and/or incorporated into management for specific areas where there was found to be a concern with OSV impacts. These include season of use restrictions from May 15 to December 1, monitoring of areas where OSV impacts are of concern, free digital and paper maps clearly showing routes (these maps are developed and published in cooperation with local snowmobile clubs and Montana, Fish, Wildlife and Parks), public education and enforcement efforts to reduce non-compliance of boundary closures in specific areas, design and maintenance of routes to reduce erosion impacts, collaboration with users and other governments to reduce non-compliance with closures, and adaptive management approaches to managing certain areas, including annual evaluation of effectiveness and potential to revisit decisions (Mt. Jefferson-response to comment 25-1).</p>
100-94	<p><i>To minimize impacts to wolverine and Canada lynx, the Forest Service should consider ensuring OSV route density is below 1 mile per square mile.</i></p> <p>Response: Please see responses to comments 99-10, 99-35a and 100-16. We are unaware of any management recommendation of specific route densities for either the wolverine or Canada lynx.</p>
100-95	<p><i>The agency should also ensure OSV use areas are discreet specified areas that consider acoustic and visual barriers to ensure wildlife habitat security.</i></p> <p>Response: The big game, wolverine and grizzly bear sections of the FSEIS has been updated with additional information. Please see the response to comment 99-10.</p>
100-96	<p><i>To effectively minimize the significant noise impacts associated with OSV use, the Forest Service should conduct soundscape modeling and incorporate the results of that modeling into its decision making. See Attachment A at 6-7</i></p>

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	<p><i>(describing noise simulation modeling used in Yellowstone National Park).</i> Response: Please see responses to comments 100-42 and 100-7.</p>
100-97	<p><i>Denning sites and suitable habitat for carnivores such as wolves, lynx, and wolverine should be carefully monitored and closed to OSV use as necessary to minimize impacts to the species and their habitat.</i> Response: OSV use does not show an effect to denning habitat or significant disruption to habitat for wolves, lynx or wolverine. However, if at any time our sister agencies or wildlife researchers identify an area of concern, we have the ability to do emergency site-specific closures.</p>
100-98	<p><i>The Forest Service should consider increasing enforcement to minimize conflicts of use. It should develop an enforcement strategy to assure that snowmobiles will not violate motorized vehicle access limitations, and damage aquatic and terrestrial resources. Adequate enforcement funding is critical to having an effective policing and enforcement program that assures motorized access does not cause damage in restricted areas. We encourage the Forest Service develop and fund an effective enforcement strategy to assure that snowmobiles will not violate motorized vehicle access limitations. Adequate resources must be devoted to user education and signage to promote public.</i> Response: Forest Service law enforcement does respond to identified violations of closure orders. The area of known concern is the Mt. Jefferson area where for the season of 2015-2016 the Forest Service began a new program funded with the assistance of the Fremont County, Idaho for winter snow rangers to maintain boundary signs and provide education and information on closure boundaries. Please see discussion in the SEIS and response to comment 25-1.</p>
Varies-11 (101, 103-125, 155-170)	<p><i>The Beaverhead-Deerlodge National Forest is a crucial part of the Greater Yellowstone Ecosystem and a connective tissue between Glacier National Park, central Idaho’s wilderness lands, and Yellowstone. The long, harsh winter in southwest Montana is a critical time for wildlife and is often the leanest, most stressful time of the year for species such as elk, moose, bighorn sheep, and wolverines. As the Forest Service reviews its winter travel management regulations, I encourage the agency to amend the forest plan to better protect key winter wildlife habitats and backcountry solitude.</i> Response: Please see the response to comment 99-10.</p>
Varies-12 (101, 103-125, 155-170, 176)	<p><i>Montana’s largest national forest is big enough for snowmobilers, skiers, hikers, snowshoers, and everyone else who enjoys getting outside in the winter. Please amend the forest plan to prioritize protecting winter wildlife habitats, while still allowing for a range of human uses in appropriate areas.</i> Response: Your support of motorized and non-motorized recreational activities on the BDNF while protecting winter wildlife habitats is noted.</p>
102	<p><i>I am writing to encourage you to amend the Beaverhead-Deerlodge Forest’s plan. The current plan puts many critical areas at risk and fails to protect the</i></p>

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	<p><i>winter range and other habitat that elk and other game depend on. This plan needs to be amended to limit snowmobiling and other motorized recreation in order to protect this important wildlife habitat.</i></p> <p>Response: Please see the response to comment 99-10.</p>
126	<p><i>We recently went on a group ride to Eagle Lake Ranch. There were around 40 sleds. After leaving the ranch we come across four moose, two laying down and two standing. I was in about the middle of the group and stopped to take pictures. As you can see from the pictures the moose were not disturbed by our presence or the first half of the snowmobiling riding past. We were maybe 20 yards from them. Snowmobiling is our winter recreation and give us the opportunity to enjoy what our area has to offer, scenery and wildlife. We are members of the Fugowee Club, located in Island Park, which has the utmost respect for our area wildlife. Please reconsider your plan to close the areas</i></p> <p>Response: Your personal observations regarding the effects of OSV use on wildlife in general on the BDNF are noted. Additionally, please see responses to comments 153-4 and 153-5.</p>
127	<p><i>Non-motorized users (hikers, skiers, snowshoers, wildlife) can co-exist peacefully together, with minimal disturbance to each other. On the other hand, motors detract from the wilderness experience for humans in the backcountry, and can also be very disruptive to wildlife. For humans, a little bit of noise and smoke is a nuisance, but for wildlife it can be harmful or even fatal because they could be forced to spend extra energy avoiding motorized vehicles during the winter months when there is little food. For these reasons, please limit motorized use as much as feasible, as it actively detracts from other users and can be dangerous for wildlife.</i></p> <p>Response: Please see the response to comment 99-10.</p>
128/129-1	<p><i>Per the complaint from WildEarth Guardians, Friends of the Bitterroot and Montanans for Quiet Recreation, I couldn't disagree more with their allegations that the Forest Service failed to adequately analyze and assess the impacts to wildlife with winter over-the snow-vehicle use.</i></p> <p>Response: Your opinion concerning the allegations made by the above name groups is noted.</p>
128/129-2	<p><i>Our family has a cabin in the Pintlars that is only accessible via snowmobile from December through April. The snow is not completely melted from the road until mid-June making the cabin 'drivable' only from July through October. Removing snowmobile access would greatly impact our ability to use and enjoy our cabin, and would greatly devalue this property. We enjoy this area during all Montana seasons. In the winter, this area is wonderful for backcountry activities such as skiing and snowshoeing. Many friends make this trek to partake. In the milder months, we enjoy being at our cabin, the hiking opportunities it offers, the fishing, the congregations of friends/family and we</i></p>

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	<p><i>very much enjoy being good stewards to this property. In these months, we spend many hours of each trip cleaning the area of dead brush, downing dead trees and making sure the forest is as intolerant to fire as we possibly can. The wood that we ‘clean up’ is wood that we than use to heat the cabin and cook over in the fire pit.</i></p> <p>Response: Thank you for your comment concerning your recreational use of the BDNF.</p>
128/129-3	<p><i>We have seen all kinds of wildlife in this area, and are respectful of their habitat. The study you’ve done in this area, and which I’ve read prior to making my comments, aligns with what we have also experienced.</i></p> <p>Response: Thank you for your personal observations. Your comment has been noted.</p>
128/129-4	<p><i>We Support alternative 4 in your response to the US District Court for the District of MT on the 2005 Travel management Rule-Supplemental EIS</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
130	<p><i>I don’t get it.... You can kill the elk, kill the deer, kill the mountain lions etc.... but you want to save the sage grouse, sheep, porcupine, wolves, buffalo etc..... but you want to shut down millions of acres that people have been snowmobiling in for decades. Snowmobilers don’t kill, ruin, wreck, mutilate or leave a foot print in any way. Why do you hate us so much? Why do you want to keep us out? We just want to have fun in our own back yard. Our land. Not yours. IT’S OURS!!! Keep it that way.</i></p> <p>Response: Your opinion concerning the effects of OSV use is noted.</p>
131	<p><i>The allowance of Over-Snow Vehicles (OSVs) into the Hellroaring drainage has been a failure of the Forest Service’s management obligations and responsibilities and, in my opinion, constitutes a violation of public trust that should be rectified by closing all 4,474 acres to OSVs. As you are aware, I worked on the Madison Ranger District for twenty-four years, from 1988 – 2012, primarily managing recreation on the district and as such, was intimately involved with the controversy relating to snowmobile use in Mount Jefferson. The most troubling aspect of this debacle is that the area should have been closed in 1993. In 1976, through the Beaverhead Forest Plan, the Forest agreed to abide by an Environmental Impact Statement (EIS) that the Bureau of Land Management (BLM) was to subsequently undertake on wilderness suitability for the Centennial Mountain Range. The BLM, as lead agency, was to evaluate both Department of Interior and Department of Agriculture administered lands within the range and recommend areas suitable for inclusion into the National Wilderness Preservation System, while releasing those that deemed unsuitable. The Forest Service agreed to abide by and comply with BLM’s findings and management recommendations. The EIS was completed in 1992. Sixty-four thousand acres, including all of the Targhee National Forest, were released from</i></p>

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	<p><i>consideration as wilderness. The remaining twenty-eight thousand acres, including the Mount Jefferson/Hellroaring area on the National Forest, were recommended. BLM closed all recommended areas under their jurisdiction to OSVs following approval, through a Record of Decision (ROD) signed by the Secretary of Interior. However, no ROD was ever issued by the Department of Agriculture, and one can only conclude that this through omission and not intent. It was, in other words, a clerical error. By the time the error was uncovered in 1996, Mount Jefferson had become, according to the Blue Ribbon Coalition, “The Crown Jewel of Western Snowmobiling” and the Beaverhead Forest, under the leadership of Supervisor Janette Kaiser, refused to correct the slip-up, despite strong urgings by the Madison Ranger District’s Ranger, to do so. Instead Supervisor Kaiser buried the issue in bureaucratic red tape and deferred it to the revised Beaverhead-Deerlodge Forest Plan. When that planning process got underway, several years later, I was on the planning team, charged with evaluating roadless areas for wilderness suitability. After three years, which seemed considerably longer, the draft plan left Dillon for final approval by the Regional Forester in Missoula. In the draft, Mount Jefferson was the highest rated recommended wilderness of the entire forest. However, Regional Forester Tom Tidwell, now Chief, decided to change the recommendation in the draft and leave half the area open as a proving grounds for high powered OSVs. Regional Forester Tidwell did insert a clause in the plan directing the allowance for OSVs would be re-evaluated if violations into the recommended wilderness portions of the drainage were common and extensive. I have personally monitored the drainage every year since the plan was signed, both as a Forest Service employee and as a volunteer, and know beyond all doubt that violations have been chronic, persistent, and pervasive, yet still nothing is done except for the Forest to call for further monitoring. It saddens me that the Forest Service has consistently failed to take action in this matter. Certainly I am naïve to think that resource concerns for wildlife, wilderness, and quiet recreation, as well as obligations made to the public and BLM, should take precedence over political pressures brought to bear. The Forest should close this area, twenty-four years after it should have been closed. Late is better than never.</i></p> <p>Response: We appreciate the historical perspective provided in your comment, which has been previously provided to the Forest Service. Please see response to comment 25-1 and consideration of the Mt. Jefferson area in the SEIS.</p>
132-1	<p><i>Snowmobiling has always been a very important winter hobby/sport for our family. We started snowmobiling in the early 1970s. Snowmobiling in the Centennial Mountains was something we truly treasured. We would pack a lunch and spend the day riding the in mountains. In all of the times we traveled to the Centennials in winter we never saw any animals larger than a squirrel, but I am not saying they were not there. In fact, in my opinion the snow was</i></p>

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	<p><i>way too deep for them to survive.</i> Response: Thank you for your views and personal observations.</p>
132-2	<p><i>As the years went by and the snowmobiles became more dependable we were able to travel further on each trip we took. Then we noticed we were being closed out of areas we had historically traveled to as a family. We would obey the closures and wonder why someone would want us locked out of our public lands because of a preconceived notion that the non motorized community was using the high mountain areas. There was never any evidence of ski tracks nor did we every see one cross country skier in the area.</i> Response: Thank you for your views and personal observations.</p>
132-3	<p><i>The access to Mt. Jefferson is thru the Caribou-Targhee Forest in Island Park, Idaho. It has been a historic snowmobile area for the past 40+ years. The snowmobilers going there obey the laws and the rules and are very courteous to other riders. Snowmobilers from all over travel to Island Park so they can visit Mt Jefferson and experience snowmobiling they cannot have anywhere else. By closing Mt Jefferson to historic use of snowmobiles it would also put a huge economic burden on the businesses in the area that depend on winter recreation. We are involved in the local snowmobile clubs as well as very involved in ISSA (The Idaho State Snowmobile Association).</i> Response: Please refer to the 2009 FEIS concerning economic contribution of OSV use in the Mt. Jefferson area to the Island Park, Idaho.</p>
133-1	<p><i>The draft SEIS points out that conflict between OSV use and other recreational uses is highest in the Mt Jefferson area. This area is wildlife rich, especially with wolverines and grizzly bears two species that people very rarely get to see. The 2009 Forest Plan allows snowmobile use within a portion of Mt Jefferson under the caveat that this use will only be appropriate if motorized users respect the motorized/non-motorized boundary. Under this Forest Plan, if monitoring shows consistent non-compliance then the decision to allow snowmobiling on Mt Jefferson will be re-evaluated. The Forest Service and groups such as Winter Wildlands Alliance have monitored snowmobile use on Mt Jefferson for many years and snowmobile trespass into the non-motorized area has been a consistent problem. The draft SEIS clearly shows that the current winter travel management on Mt Jefferson is not working as intended. The time has come for the Forest Service to recognize that the only way to effectively protect wilderness values, wildlife habitat, and non-motorized recreational uses on Mt Jefferson is to amend the Forest Plan and prohibit OSV use on Mt Jefferson, using the Continental Divide as a boundary.</i> Response: Please refer to response to comments 25-1 and 99-32 and to the analysis in the SEIS concerning monitoring, enforcement efforts and OSV impacts.</p>
133-2	<p><i>The Forest Service is legally obligated to minimize harassment of wildlife or</i></p>

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	<p><i>significant disruption of wildlife habitats and, as the literature review in the draft SEIS acknowledges, cross-country motorized travel in winter range causes significant negative impacts to wildlife. Despite this, 60% of winter range on the BDNF is currently open to unrestricted snowmobile use and none of the Alternatives analyzed in the draft SEIS adequately protect winter ranges. Wildlife is rich here and allows for hunting opportunities which is one of the leading economic drivers in this area, providing hundreds of jobs and millions of dollars to the local economy. The Forest Service should amend the BDNF Forest Plan to prohibit cross-country snowmobile travel within all high-value winter range.</i></p> <p>Response: Please see the response to comment 99-16.</p>
134-1	<p><i>... There are no justifiable reasons to restrict winter recreation based on big game winter range issues. Elk are “at or above population objectives” and the elk population across the Forest has GROWN from 28,220 in 2007 to 48,863 in 2015. DSEIS at 97. The USFS acknowledges “that forest wide, winter motorized travel is not affecting elk populations.” OSV travel “has not been identified as an issue for mule deer or moose populations across the Forest. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and “there are no known cases of conflict with mountain goats as a result of winter recreational activities on the BDNF.”</i></p> <p>Response: Please see the response to comment 153-4.</p>
134-2	<p>There are no justifiable reasons to restrict winter recreation based on concerns about lynx or wolverine. “We are unable to identify any discernible effects to lynx on any of the landscapes” says the USFS DSEIS at 129. For wolverine, specialists “continue to say that the best scientific information available does not substantiate recreational activities as a threat to wolverines.” DSEIS at 151.</p> <p>Response: Please see the response to comment 153-5.</p>
134-3	<p><i>The District of Montana and Ninth Circuit courts both UPHELD the earlier 2009 plan for Mount Jefferson. The court orders do not compel closure of Mount Jefferson. In truth, it would contradict the orders to rely on them as a basis for restricting long-continuing snowmobile riding at Mount Jefferson.</i></p> <p>Response: The 9th Cir. held that in compliance with NEPA the Forest Service took a “hard look” at the impacts of snowmobile use on non-motorized recreation and in particular in the Mt. Jefferson area where the court found that the “forest Service aimed to balance recreational uses, acknowledged that the effectiveness of its decision relies upon voluntary compliance, created monitoring protocols for the area, and stated that it plans to re-evaluate its decision if non-compliance occurs.</p>
134-4	<p><i>The DSEIS does not contain data or analysis that would support restrictions or closure of Mount Jefferson to snowmobiling. The USFS acknowledges that “[c]onflicts among uses are not about physical confrontations between users in</i></p>

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	<p><i>the field; it is more about personal values and perceptions of motorized versus non-motorized uses.” DSEIS at 155. The DSEIS contains no information about unique concerns at Mount Jefferson or a trend toward some unacceptable threshold of “illegal” use. Rather, use “has been monitored every year since 2001, documenting motorized intrusions into the closed area each successive year.” DSEIS at 156. The prior decision, which was upheld by the courts, should remain in place.</i></p> <p>Response: Please refer to the response to comment 134-3.</p>
135/136-1	<p><i>I recreate in many of the areas that are under review. We spend some of our time in Wise river. Lolo, Hamilton and West Yellowstone areas of Montana. We camp, fish, snowmobile, atv, hike and take photos. As I get older I need the snowmobile and atv to enjoy many of these places. I have snowmobiled in each of these areas this winter 2016. We rode in those areas last year also. Rarely do we even see other people out there. The only animal I see in the wintertime is various birds. The beauty is great to behold in all of these places. I have never had a conflict with anyone about where I ride or hike. I am the ride leader and co-chair for TransMt charity ride. We raise money for mental illness in Montana. We ride snowmobiles in each of these areas. I am law abiding and respect others. I am also a long time member of Cascade County search and rescue. I hope all of these areas are kept open for other generations to enjoy as I have. I love the outdoors and spend lots of my time out in it. I am now retired so I get to travel and do more outdoors trips. Plan on atving West Yellowstone area this summer.</i></p> <p>Response: Thank you for your views and personal observations.</p>
136-2	<p><i>It would be a shame if our grandchildren are not allow to enjoy these areas as we have. Please do not close any further trails.</i></p> <p>Response: Thank you for your views.</p>
137-2	<p><i>25 years ago I started a backcountry ski business in the Hellroaring Basin of Centennial Valley in the Beaverhead National Forest of Montana. I didn’t do it for the money, but for the love of the sport and to spend time in this special, remote wilderness. In those early years there was no motorized use taking place, with the exception of late spring, when the snow set up firm and we were done skiing for the season. As technology rapidly began to advance. Snow machines started invading this special winter wonderland. This not only impacted every ones experience, but destroyed the un-tracked powder snow. The utter disappoinment that I saw on my clients faces prompted me to approach the Forest Service about this problem. According to the original plan motorized use was not supposed to be allowed in this area and was admitted to be a mistake. Thus began a long bitter battle with Idaho snowmobilers that assumed ownership of a Montana forest. Their main point was that they couldn’t access the North side of Mt. Jefferson without going through the Montana portion on the South side. Since that time technology has advanced</i></p>

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	<p><i>enough that they don't need to go through the Beaverhead Forest to access the terrain they desire on the Idaho side of the Mountain.</i></p> <p>Response: Please see response to comment 25-1 and discussion in the SEIS concerning user conflict in the Mt. Jefferson area. The lower portions of Hellroaring Creek on the BDNF is so rugged it restricts access to the upper portions of Hellroaring Creek. As a result, motorized access to the upper portion of Hellroaring Creek is from Idaho.</p>
137-3	<p><i>The claims of economic hardship by the Island Park businesses (rental shops) is totally bogus and have been proven to be untrue, yet they keep yapping and whining about 4,500 hundred measly acres, out of a whole landscape, that they have play on. All the Idaho side of the Centennial Range is open to motorized use plus 500 miles of groomed, taxpayer subsidized trails that are maintained all winter for their pleasure. How can any fair, reasonable, intelligent person not see that mandated balanced recreation opportunities are not being provided by the Forest to all users?</i></p> <p>Response: Your views are noted.</p>
137-4	<p><i>Pure Politics has ruled this issue since day one. Two Forest Service managers were immediately promoted to Washington D.C after giving quiet recreationists the shaft, because of efforts by the Idaho congressional delegation. I would be interested to hear from public land managers that are following the current election cycle why they think that voters are so angry and frustrated. This exact same type of "Good Ole Boy" decision making is a big part of the reason. The result is an agency that operates in a deficit, leaving our forests untended, dragging our economy down, while at the same time discouraging diverse, healthy recreational opportunities out of convenience and political pressure. What a sad legacy.</i></p> <p>Response: Your views are noted.</p>
137-5	<p><i>Wildlife and wilderness values continue to suffer. Both wolverine and Canada Lynx were present in the Hellroaring Basin in 1991. No more. Gee I wonder why. I have witnessed numerous snowmachiners packing heat and chasing furbearers. It is a common occurrence. Another sad legacy.</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on wolverine and lynx on the BDNF are noted. MFWP biologists are not identifying predator hunting on OSVs as an issue. Additionally please see responses to comments 151-1 and 151-2.</p>
137-6	<p><i>The latest Forest Plan denied quiet recreationists the opportunity they deserved, but fortunately established a mechanism by which the area could finally be closed. It is called "monitoring". Snowmobilers have violated the rules every year since implementation, yet nothing has been done. I wonder why?</i></p> <p>Response: Your views are noted. Please see the SEIS and response to comment</p>

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	25-1 concerning efforts being taken to reduce non-compliance.
137-7	<p><i>Please do the right thing, finally, once and for all, before those of us that have been writing letters, going to meetings and begging, for the last 25 years, die of old age.</i></p> <p>Response: Your views are noted.</p>
138-1	<p><i>The maps of winter habitat and of snowmobile usage provided in the Draft SEIS were very insightful. However, the Board of Directors of Montana Wilderness Association’s Madison-Gallatin Chapter still has concerns with how those maps line up with Alternative 6 Modified: The OSV Rule requires that designated routes and areas are located so as to minimize damage to natural resources, conflicts with other uses, and impacts to wildlife and wildlife habitat. There are many areas that are designated as “high value” winter habitat that are still open to snowmobiles. We believe B-DNF should close most, if not all, of those areas. Specifically, the plan leaves more than 60% of winter range open to snowmobiles and other motorized winter recreation. Currently, 91% of the Big Hole winter range, 83% of the north side of the Flint winter range, and 77% of the Pioneer Winter Range are open to snowmobile use.</i></p> <p>Response: Please see responses to comment 99-16 and 99-21.</p>
138-2	<p><i>There are extensive landscapes that see “none to seldom” snowmobile usage. Rather than default to leaving those open, why not close them? As we understand it, the new OSV rule prohibits the USFS from defaulting to open. Plus, having fewer/smaller areas open to OSV use would allow the FS to better utilize its limited resources and would be a significant improvement in wildlife management.</i></p> <p>Response: The SEIS analyzes the impacts of those areas open to OSV use. The analysis shows there are very few places on the Forest where there are potential effects to wildlife. Please see the response to comment 99-10.</p>
138-3	<p><i>Recommended Wilderness areas, Wilderness Study Areas and proposed wilderness areas should be closed to preserve their wilderness character, specifically the quiet and solitude. The use allowed on Mt Jefferson is degrading the quality of an adjacent Recommended Wilderness area. The logical approach should be to close Mt. Jefferson area to snowmobiling at the Continental Divide, which becomes an identifiable, logical, landscape-based boundary, rather than having an arbitrary boundary in the middle of meadows. The Forest Service and Winter Wildlands have documented evidence of consistent intrusions over the current boundary.</i></p> <p>Response: Please refer to responses to comments 100-41, 100-84 and 25-1.</p>
138-4	<p><i>Given that the percent of cross-country skiers have increased 305% (from 4% to 12.2%) and the number of snowmobilers has decreased 43% (from 3% to 1.7%) in the intervening years, more OSV closures are called for. We encourage you to guarantee non-motorized users certainty through this forest plan.</i></p>

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	Response: Please see response to comment 99-15.
138-5	<p><i>In the interest of allowing for genetic diversity amongst far-reaching species like wolverines and grizzly bears, we need to think in terms of prohibiting motorized use in the corridors that link these ranges.</i></p> <p>Response: Please see responses to comment 32a-5, 99-10 and 100-19.</p>
138-6	<p><i>We agree that Alternative 6 Modified was better than Alternative 1, the previous status quo, but we don't believe it is fully supported by the new SEIS.</i></p> <p>Response: Your preference for Alternative 6 Modified over Alternative 1 is noted. We assume your opinion that Alternative 6 Modified is not fully supported by the SEIS is based on your prior 5 comments. Please refer to our responses to comments 138-1 through 138-5.</p>
139-1	<p><i>Whenever I travel in Whitetail-Pipestone I see off-trail and off-road violations. This winter I took a 5 mile loop hike on a motorized route from 4 Corners across Big Pipestone Creek. I saw numerous places where dirt bikes and side-by-sides went off trails and roads through 6-10 inches of snow. They were riding off-trail up steep canyon slopes or jumping off cut slopes onto the Delmoe Lake road. I have been to Mt Jefferson non-motorized area 4 times and have seen closure violations on each trip. My point is that a percentage of motorized recreationists have a hard time regulating themselves. Travel restrictions need to be easy to understand and easy to enforce.</i></p> <p>Response: The purpose and need of this project deals with over snow vehicle use rather than the wheeled motorized use described in this comment; however, the importance of effective signage, education and enforcement, as well as user cooperation and compliance is noted. The BDNF believes that user cooperation has resulted in effectively avoiding and mitigating use conflict, and that closure of areas is not the only solution to use conflict. Please see response to comment 25-1 and the section on Mt. Jefferson in the FSEIS.</p>
139-2	<p><i>Boulder River: Alternatives 3, 5 or 6 are satisfactory. Historically, there were a lot of winter range area closure violations in the Boulder River (Whitehouse Campground-Bernice area). I prefer closures that are easy to understand and enforce with less acres closed that closures that maximize area but are hard to follow and enforce.</i></p> <p>Response: Your views are noted.</p>
139-3	<p><i>Jefferson River: I like the Alternative 6 closure in the Dry Mountain-Ration Mountain area. It could be expanded to Hay Canyon. Many elk wintered in this area this winter. It fits with the purpose of the Bull Mountain Game Range and the Forest Service agreement with the US Fish and Wildlife Service. I also like the closure for the Bull Mountains but would extend the closure north to include Hadley Park. Hadley Park is an open wind-blown ridge that is used as winter range. Winter range is on both sides of the Bull Mountains and the public doesn't seem to have winter access to the southern 2/3s of the range. One of</i></p>

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	<p><i>the good places to snowmobile in the Jefferson River landscape is Whitetail Park and Little Boulder Park. These parks are open, fairly flat and hold good snow. The route from the Delmoe Lake road to Whitetail Park via Halfway Park has minimal effects on wildlife. The Little Boulder route has more conflicts with Big game winter range and should be closed or restricted to the road and trail. I do not feel strongly about this area being open or closed.</i></p> <p>Response: Of these areas mentioned in the Jefferson River Landscape, Hadley Park is the only place the local MFWP biologist expressed a potential for OSV conflicts and big game. There is not a groomed or marked Little Boulder route. The Boulder Landscape, which the Little Boulder area is within, has additional areas closed to OSV use specifically for big game winter range in alternative 6 Modified. The FSEIS has been updated to incorporate landscape, site-specific information. Additionally, please see responses to comments 99-9 and 99-1.</p>
139-4	<p><i>Alternative 6 is the only alternative that addresses elk, moose and mule deer winter range in the Hells Canyon area. Hells Canyon like Whitetail-Pipestone experienced increased off-road use onto old skid trails and user created trails that became established routes that disrupt wildlife.</i></p> <p>Response: Your support of Alternative 6 has been noted. Please see the response to comment 99-10.</p>
139-5	<p><i>I prefer Alternative 3 or 5. Alternative 3 and 5 close areas where mountain goats have traditionally wintered, Beal and Brooks Canyon. I do not like the proposed open route up the South Boulder through Sailor Lake and over the mountain to Dry Boulder or Mill Creek as shown in Alternative 6. The Sailor Lake – Lost Cabin Lake-Louise Lake areas are part of the national Recreation Trail System and have been closed to motorized use since the mid- 1980s. I ski up the South Boulder Road from Mammoth to Sailor Lake and Lost Cabin Lake. I appreciate the solitude and untracked snow around these two lakes. Sometimes when I am near Sailor Lake, I can hear the roar of snowmobiles from the other side of the mountain in Mill Creek. Please don't open an area that has been closed.</i></p> <p>Response: Thank you for your support of Alternatives 3 and 5. As you have noted, the area around Sailor Lake allows for a non-motored recreation experience and solitude, as it is restricted to snowmobiles from Dec 2 to May 15, and the larger area beyond is restricted to snowmobiles yearlong. Please also see response to comments 7-1 and 99-10.</p>
139-6	<p><i>In regard to Mt Jefferson...It appears to me that it is a good example of how to make a closure difficult. The area is well signed but the some of the closure boundary is not along any topographic feature, making it easy for snowmobilers to enter the closed area. The boundaries are remote and hard to enforce. The DSEIS refers to areas that have off-road vehicle use (ATV, side-by-side) during the winter. Some of these vehicles can travel over the snow and on bare ground (padded ATVs). I recommend that the only vehicles allowed to travel off road</i></p>

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	<p><i>and over the snow be snowmobiles. In low snow areas these padded vehicles will create lots of vegetation and soil damage. After seeing the exponential growth of motorized use in the Whitetail-Pipestone area and the associated resource effects and wildlife displacement, I recommend that your decision be conservative and choose the better aspects of Alternatives 3, 5 or 6.</i></p> <p>Response: Please see the SEIS and response to comment 25-1 in terms of the boundary closure and efforts to make the boundary known with enhancing signs, changing sign locations, handouts, orange flagging, and increased snow ranger patrols. In response to impacts of tracked vehicles, please see the response to comment 99-56.</p>
140/141-1	<p><i>I want you to select Alternative 4. This area is an important area for my way of life and the recreational opportunities that it offers for us that live in the area. Snowmobiling in this area has no effect on any wildlife and does not diminish any future possibility of wilderness.</i></p> <p>Response: Thank you for your support of Alternative 4. Additionally please see responses to comments 153-4 and 153-5.</p>
140/141-2	<p><i>The main reason for closure is for a select few of skiers. There are very few skiers in contrast to snowmobilers that use the area for winter recreation.</i></p> <p>Response: Your observations are noted.</p>
140/141/142-3	<p><i>This area of Mt. Jefferson is not only a special place it offers many things that cannot be found in the other area forests. By closing this for snowmobile use in the winter you will force more snowmobiles into tighter areas and ruin the winter recreational experience in and around the area. When we use the Mt. Jefferson area we utilize the area for all winter recreation and it offers EVERYONE a spot. We ski in it, snowmobile in it, snowshoe in it, and enjoy all the uses. This area belongs to EVERYONE and should not be closed for a “Special Group” of skiers.</i></p> <p>Response: Your views are noted.</p>
141-4	<p><i>This is an important corridor between the north and south snowmobiling areas that lay within the borders of Idaho. By closing this area in Montana this will close a corridor and restrict access to the Idaho sides of Mt. Jefferson. The future of this area should not come down to opinions and conflict, but should be managed for the better of all people and all recreation.</i></p> <p>Response: Your views are noted.</p>
142-1	<p><i>My company and employees would request that you accept Alternative 4 when you make the decision for the future recreational use of the Mt. Jefferson area. This area is an important area for way of life and the recreational opportunities that it offers for us that live in the area, and for our employees that work in the area. This area provides many opportunities that will be jeopardized with any of the other Alternatives.</i></p> <p>Response: Your views are noted.</p>

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142-2	<p><i>It is an economic driver along with the solitude to keep one’s mind at peace.</i> Response: Please see response to comment 132-3.</p>
143-1	<p><i>The idea of closing any more areas of the forest makes no sense. If damage was occurring I would be the first in line to say "close it". The lawsuit that has led to the lawsuit against the USFS by so called environmental groups is obviously based on "social issues" and not on environmental impact, science, law or common sense... The actions of these groups are not supported by the vast majority of local residents and those who use the BDNF on a regular basis... They have seen their forest access systemically restricted without reason or science. Any further closures will further add to their disenchantment with the USFS. Please base your decisions on reason, science and fairness.</i> Response: Your support of Alternative 6 Modified is noted.</p>
143-2	<p><i>There are no detrimental effects on vegetation, air quality, and on snow melt water quality from snowmobiling.</i> "snowmobileinfo.org/research-studies-snowmobiling-impact-vegetation.html" "snowmobileinfo.org/research-studies-snowmobiling-impact-air-quality.html" "snowmobileinfo.org/research-studies-snowmobiling-impact-water.html" Response: Our review of scientific literature filed at the cited web pages drew a different conclusion than the one provided by this individual. These documents describe impacts (such as broken branches, emissions from snowmobiles, etc) similar to those described in the SEIS. Some of the researchers attempted to address these impacts within the overall context of the affected environment of their study area and intensity of impacts. The SEIS also attempts to disclose these effects within the context of the BDNF and intensity of effects.</p>
143-3	<p><i>Researchers have concluded that the debate regarding the effects of motorized recreation on wildlife is largely a social issue as opposed to a wildlife management issue. White 2005 (study)</i> Response: We are uncertain exactly which study is being referenced. White et.al 2005 published in the Journal of Applied Ecology is a review, “Questionnaires in ecology: a review of past use and recommendations for best practice.” In it they give an example of questionnaires they reviewed and stated, “In North America, obtaining views of different user groups and the general public is seen as a very important part of effective management for wildlife resources...As the interest and participation of the general public in decision-making on wildlife issues is increasing, management is being driven more and more by societal perceptions.” This statement was not made in reference to motorized recreation. This statement is referring to management actions, not effects as the reviewer suggests. They also state, “However, in our study only 21 of 168 (12.5%) questionnaires included any form of analysis of non-respondents. This means that 87.5% of the questionnaires were untested for non-response bias, and thus may have produced invalid, non-generalizable</p>

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	information. This is a particular concern where these questionnaires may have been used to provide background information for policy decisions.”
143-4	<p><i>Sound is a complaint by some non-motorized groups. It is interesting that I have only seen 9 non-motorized users in the BDNF in the back country and they were only a mile or so from a parking area. I don't recall seeing anyone in the backcountry in 19 years other than other snowmobilers. How can sound in the backcountry be a problem if no one hears it?</i></p> <p>Response: Your views and observations are noted.</p>
143-5	<p><i>Closing more areas in the Big Hole valley of the BDNF to snowmobiling would be devastating to local economies. Winters are their slowest time of the year as it is. Over half the businesses in the Big Hole valley are for sale. They are struggling and cannot take further loss of income.</i></p> <p>Response: Your views are noted concerning the economic impact of snowmobiling in the Big Hole Valley.</p>
143-6	<p><i>If no harm is being done the forest it should be left open for all to use.</i></p> <p>Response: Your support for continued OSV use on the BDNF is noted.</p>
144-1	<p><i>I would like to voice my support for Alternative 4 (the lesser of the evils).</i></p> <p>Response: Your support for Alternative 4 is noted.</p>
144-2	<p><i>These winter recreation areas, along with others in the BDNF, are critical for local communities' economic viability. Without the spending from snowmobile users in these isolated communities, these economies may cease to exist.</i></p> <p>Response: Your support for continued OSV use on the BDNF is noted.</p>
144-3	<p><i>I urge you to look at the minimal impact that snowmobile use has been proven to have on wildlife and the environment (when the snow is gone, so is the impact). There are few, if any, recreational opportunities on our forests that have such a substantial positive economic impact without an equally substantial negative environmental impact; snowmobiling on the BDNF should be expanded not diminished.</i></p> <p>Response: Your support of continued OSV use on the BDNF is noted. Alternatives 1 and 4 would allow OSV use on more acres than the 2010 ROD. The SEIS discloses potential impacts from OSV use on the BDNF.</p>
144-4	<p><i>I know of many individuals that frequent the Mount Jefferson area for snowmobiling and are devastated to hear of only one alternative leaving this area open for snowmobiling. The alternatives do not seem to reflect the ideals and desires of the public.</i></p> <p>Response: Alternatives 1 and 4 consider OSV use on the BDNF in the Mt Jefferson area. Alternative 6 Modified considers OSV on the southern portion of Mt Jefferson. Your support of continued OSV use in the Mt Jefferson area is noted.</p>
145-1	<p><i>I seldom see USFS employees in the Centennial Valley from mid-October through April, so wonder if you know of the use of snowmobiles to routinely kill</i></p>

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	<p><i>coyotes during most of the winter. Folks run the animals down. My staff has seen as many as ten taken in one day by a couple of riders. I tell you this because this is active take of wildlife using a snowmobile there the practice is legal for coyotes. Mt. Jefferson is a known maternal denning habitat for wolverine. I understand there is likely only territory enough for one family in the entire Centennial Range. Studies showing little conflict between OSV and wolverine compare non consumptive OSV use. It would only take one rider, who is at times a coyote chaser, to decide to pursue a brown spot somewhere on the landscape in Hell Roaring. The result would be a heavy impact to a grizzly, wolverine, or Lynx. I know you don't have data to say there is a conflict, but I submit, my data show snowmobilers in SW Montana regularly chase and kill wildlife that is legal. Not much of a leap to illegal when rider is in remote location of Hell Roaring.</i></p> <p>Response: Your conclusions/opinion regarding the effects of OSV use on grizzly bears, wolverine and lynx on the BDNF are noted. This comment speculates illegal hunting. Additionally please see responses to comments 151-1 and 151-2.</p>
145-2	<p><i>For the past 7 years... we have visited the upper Hell Roaring area... That is a 5-7 mile walk or horseback from the Montana BLM trailhead... picture at Lillian Lake, just 200 yards from the signs designating B-D area currently open to OSV travel. When we walk past those signs, into the "open area", we find trash, snowmobile windshields and snowmobile body parts; depressing, in such an otherwise pristine location. It leads me to believe snowmobiler claims of no impact are hollow.</i></p> <p>Response: Your observations are noted</p>
145-3	<p><i>OSV use within spring bear habitat seems at odds with best management practices for protection of that critter. Recent media tells us grizzly bears are already emerging from winter dens in Greater Yellowstone. As I write this on March 3rd, I am sure OSV use in Hell Roaring has not yet ended. Seems like a conflict to me!</i></p> <p>Response: Please see responses to comment 99-10 and 99-31.</p>
145-4	<p><i>I am sure your LE employees have difficulty enforcing the closed area. I have met B-D staff up there in late summer. They tell me of their frustrations of trespass into the closed area. Once riders get into the 4474 acres piece of MT, trespass into the closed area is routine. From my own experience in the Centennial, Federal LE officers have great difficulty keeping up with snowmobile violators. Their machines have capability that far exceeds what you can provide your staff. Why not provide them with a more enforceable boundary?</i></p> <p>Response: Forest Service law enforcement does respond to identified violations of closure orders. The area of known concern is the Mt. Jefferson area where for the season of 2015-2016 the Forest Service began a new program funded with the assistance of the Fremont County, Idaho for winter snow rangers to</p>

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	maintain boundary signs and provide education and information on closure boundaries. Please see discussion in the SEIS and the response to comment 25-1.
145-5	<p><i>Public lands on Montana's side of the Centennial Mountains is mostly quiet use. Everything in Idaho is motorized. In Montana, BLM has designated most of the Centennials as Wilderness Study Area. The US Sheep Station is not officially open to any public use and snowmobiling is prohibited at Red Rock Lakes NWR except on county roads. It would be great if B-D would add that 4474 acres to the landscape where quiet rules.</i></p> <p>Response: Your views are noted.</p>
146-1	<p><i>The 2009 Record of Decision for the Beaverhead-Deerlodge National Forest Plan recommended the north portion of the Mt. Jefferson/Hellroaring Creek area in the Centennial Mountains as wilderness and left the south portion open to snowmobiling, providing access for snowmobilers on the Idaho side of Mt. Jefferson. In the 2009 Record of Decision it states... (page 21). Motorized winter use in the Mt. Jefferson area has been monitored every year since 2001 by ski patrols conducted by the Madison Ranger District and BLM personnel, snowmobile patrols conducted by Forest Service Snow Rangers and Forest Service and BLM Law Enforcement Officers, citizen reports generated primarily from skiers using the Hellroaring Ski Hut located in BLM administered lands, and occasional air patrols sponsored by the Winter Wildland Alliance, BLM, and Forest Service. Over the years there have been several efforts made to better identify the closure area boundary and yet motorized intrusions into the closed area continue.</i></p> <p>Response: The comment is correct in terms of the statements made in the 2009 FEIS ROD. Education and enforcement efforts also continue.</p>
146-2	<p><i>As you are aware over the last several years, we have authorized a Special Recreation Permit in the Centennial Mountains WSA for a recreation service provider who has offered the only backcountry ski opportunities available anywhere in our Field Office. This location was selected to provide a unique opportunity to public land users based on the combination of consistent high quality snow and outstanding wilderness qualities, including the legal closure to snowmobiles. This is currently the only location in the Field Officer where a backcountry wilderness skiing opportunity has been offered.</i></p> <p>Response: The comment is correct that Forest Service is aware of the Special Recreation Permit in the BLM’s Centennial Mountains Wilderness Study Area for a back-country skiing and yurt operator.</p>
146-3	<p><i>The continued non-compliance of the motorized users in the Mt. Jefferson area continues to complicate the management of the adjacent BLM administered lands in the Centennial Mountains Wilderness Study Area and causes negative impacts to the backcountry ski experience.</i></p>

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	<p>Response: The area on the BDNF adjacent to the BLM Wilderness Study Area is closed. However, the Forest Service acknowledges non-compliance occurring in the Forest Service’s Centennial Mountain recommended wilderness area and the BLM wilderness study area and is monitoring and taking actions to reduce non-compliance with the closure order including new efforts that began in the 2015-2016 season. Please also see response to comment 25-1.</p>
146-4	<p><i>For this reason the BLM Dillon Field office would like to express our support for the portions of all action alternatives which propose to close the Mt. Jefferson area to winter motorized vehicles and for moving the boundary between motorized and non-motorized use areas to a more effective topographical barrier.</i></p> <p>Response: Your support of Alternatives 2, 3 and 5 is noted.</p>
147-1	<p><i>Citizens for Balanced Use (CBU)...strongly supports alternative 4. The negative impact of closing areas of the B-D to winter over snow vehicle use are significant in small communities located around and adjacent to FS managed land. Local economies in these small communities depend on winter multiple use recreational access to survive. Many of our members own businesses in these communities which operate for the sole purpose of providing services to visitors during the winter months. Any reduction in multiple use recreational access during winter periods would be devastating to these businesses and the communities they support.</i></p> <p>Response: Your views are noted.</p>
147-2	<p><i>Snowmobile use in the B-D and southwest Montana rates #9 in the nation. University of Montana Bureau of Business and Economic Research released information on spending trends and patterns in their winter 2014 edition. The report states that more than 100,000 Montana residents participate in snowmobiling every year. Non-resident spending was 14.3 million and resident spending was 96.3 million... According to the report non-resident snowmobiling in Montana supports 200 jobs and many of these jobs are in the small communities near the B-D. A loss of 5 jobs in small towns like Wise River, Wisdom, Jackson or Phillipsburg would be devastating to these communities.</i></p> <p>Response: Please see response to comment 26-3.</p>
147-3	<p><i>Snowmobile registration in Montana has doubled in the last 7 years according to the study yet wildlife populations for big game has also increased during that same time. Currently 80 elk management units in Montana are above target levels according the Montana Fish Wildlife and Parks.</i></p> <p>Response: Thank you, your observations have been noted.</p>
147-4	<p><i>We understand the agency is under direction from the court to analyze the effect of winter motorized access on wildlife. We agree this analysis is important but we also know through personal experience and knowledge that over snow vehicle use does not adversely affect wildlife. In surveying our</i></p>

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	<p><i>members about wildlife conflicts we have gained a greater understanding of where wildlife is and also their response to motorized use.</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on wildlife on the BDNF are noted. Additionally please see responses to comments 153-4 and 153-5.</p>
147-5	<p><i>Flight distance of wildlife is considerably less when wildlife perceives a reduced threat in human encounters. Many respondents to our survey indicate their ability to stop and remain on their vehicles as wildlife remains calm and unalarmed. Respondents also indicate wildlife is disturbed only when people dismount their vehicle. Studies in Yellowstone Park where heart monitors were placed on elk seem to support the observations of our members in regards to flight distances. Elk disturbance from snowmobiles was half that of cross country skiers (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. 9pp). This information is important in your decision of there over snow vehicles are allowed to continue use and where non-motorized use should be allowed.</i></p> <p>Response: The DSEIS starting on page 40 details many general effects to wildlife from OSV use. Habituation was recognized as a possible effect in the DSEIS in the Literature review regarding big game and in several of the landscape, site-specific analyses (updated in the FSEIS). This includes a consideration of a 2006 study in Yellowstone National Park. One must be cautious when comparing effects of OSVs in Yellowstone National Park to the BDNF. There are no places on the BDNF that has a high level of OSV traffic similar to Yellowstone. Please see the response to comment 99-10.</p>
147-6	<p><i>If elk disturbance is an issue, which the court has ordered you to consider in the decision, then non-motorized travel restrictions must be considered before additional motorized travel restrictions are adopted in areas of big game.</i></p> <p>Response: Pursuant to the Ninth Circuit’s June 22, 2015 Opinion, in an August 27, 2015 Order, the US District Court for the District of Montana ordered the Forest Service to “...’properly disclose the information underlying its analysis of snowmobile impacts on big game wildlife’ and ‘adequately appl[y] the minimization criteria in the [2005 Travel Management Rule]’”.</p>
147-7	<p><i>The court order did not direct the Forest Service to close or reduce Over Snow Vehicle Use, it only directed the Forest Service to do further analysis on wildlife impacts. As little to no evidence of wildlife disturbance or displacement exists, the current use should remain. There are no justifiable reasons to restrict winter recreation based on big game winter range issues. Elk population numbers continue to grow and are at or above target population number as reported by Montana FWP.</i></p> <p>Response: In compliance with the court order the SEIS analyzes the effect of OSV use on big game and on the minimization criteria including harassment of</p>

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	wildlife and significant disruption to wildlife habitats. Please see response to comment 99-10 discussing the analysis.
147-8	<p><i>The DSEIS states on page 129 that "We are unable to identify and discernable effects to Lynx on any landscape" and also specialists stated on page 151 "continue to say that the best scientific information available does not substantiate recreation activities as a threat to wolverines." This is important information and our members are witness to the same being true. We have never received any information from our members in regards to either wolverine or lynx sightings during snowmobile activities in the Beaverhead Deerlodge NF.</i></p> <p>Response: Your personal observations of wildlife use in the area during the winter is noted.</p>
147-9	<p><i>Much discussion has been about user conflict. Our members have reported little to no conflict with other user types while recreating. Non-motorized users tend to remain close to trail head locations and generally within a mile or two from parking areas. Backcountry skiers are increasing their use own snowmobiles to access backcountry areas further away from trailheads. To restrict motorized over snow vehicle use in the B-D would negatively impact those backcountry snowboarders and skiers.</i></p> <p>Response: Your views and observations are noted. The Forest Service understands that snowmobiles are also used as a means of transportation by those who are undertaking non-motorized recreation. This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
147-10	<p><i>Region 1 issued a January 2006 paper in response to a request from CBU as to how the FS responds to user conflict in forest plans and travel plans. Abigail Kimbell, Region 1 Supervisor at that time and ultimately Forest Service Chief prior to Tom Tidwell, stated in #3 of the letter below, "Desire to separate user types is not a justification we use". Although this question and her answer relate to "motorized trail use", it clearly would apply to any closures of snowmobile use for reasons of user conflicts. In this letter she also makes clear there is no national directive regarding continued historic use of Recommended Wilderness Areas where an existing or established use is present.</i></p> <p>Response: The quoted statement from the January 24, 2006 letter is in response to a statement from CBU members – specifically that “‘Desire to separate users types’ is being used to justify some area closures of motorized use.” Regional Forester Kimball began her response with the sentence quoted in this comment and continued “What we generally strive for is to meet the needs of all users at the highest level possible while protecting the resources, minimizing user conflict, being consistent with laws and providing maintainable routes. Occasionally, it is necessary to separate user types to meet these goals,</p>

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	<p>however, desire to separate user types is not a justification or goal we use.” Consistent with this response from Regional Forester Kimball, the SEIS and draft ROD discloses the effects of OSV use on areas designated open, including minimizing those impacts by closing some areas.</p> <p>This same letter also addressed CBU’s concerns about motorized and mechanized restrictions in Recommended Wilderness Areas (RWAs). While line officers have some discretion when determining uses in RWAs, they must weigh these decisions carefully to protect the values that qualify the RWAs for wilderness consideration. When approving the Forest Plan, the Regional Forester decided to restrict motorized use in RWAs.</p>
147-11	<p><i>The FS DSEIS is correct in finding no significant impact from over snow vehicle use to wildlife and our members that have used these areas for decades agree. Wildlife numbers are increasing, over snow vehicle use does not occur in areas of winter range and areas of low snow conditions, and therefore over snow vehicle use is not a factor in wildlife disturbance in areas of OSV use.</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on wildlife on the BDNF are noted. Additionally please see responses to comments 153-4 and 153-5.</p>
147-12	<p><i>Many areas of the B-D are important to many people for many different reasons. Access to these areas in winter months is difficult if not impossible without the use of OSV. Families spending time together in the outdoors with grandparents and grandchildren are so important to our members. People with disabilities and the handicapped must have transportation to visit and experience these wondrous areas during wintertime.</i></p> <p>Response: Your views are noted. Please also see the response to comment 39-3.</p>
148-1	<p><i>The BDNF did not sufficiently minimize risk to wolverine; the wolverine minimization criteria analysis is insufficient. The wolverine model used is outdated and not Best Available Scientific Information. The model used in the SEIS is based on outdated information (from 2001) that is no longer the best available science available and it appears to underestimate wolverine habitat. We encourage the BDNF to reanalyze the impacts wolverine habitat using an updated and widely accepted model – the Inman model (Inman et al, 2013)...the Inman model includes not just modeled wolverine maternal habitat but primary wolverine habitat as well, differentiating between the two. It is important to include analysis of both primary and maternal wolverine habitat, as primary wolverine habitat remains important to include.</i></p> <p>Recommendation (from reviewer): Use a more up-to-date wolverine habitat model such as the Inman model. Include effects analysis to both primary and maternal habitat.</p> <p>Response: The wolverine effects section in the FSEIS has been updated to incorporate additional research including the new modeled denning habitat</p>

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	<p>from Inman 2013. All the habitat layers were considered. Researchers theorize that the highest potential for negative disturbance impacts is disturbance at den sites (Inman, 2007, Heinemeyer et. al. 2010). Based on this information, the female maternal habitat is the key layer to utilize for analyzing effects to wolverine habitat from OSV travel. Refer to the updated section of the FSEIS for a discussion of how the research was incorporated into the document. Additionally, please see the response to comment 99-10.</p>
148-2	<p><i>Impacts to wolverine by winter recreation must be better assessed. In its minimization assessment of the level of harassment on wolverines, the draft SEIS simply considers an extremely small definition of harassment – the number of tickets the Montana Fish, Wildlife and Parks (MFWP) has issued for wildlife harassment. This cursory look and highly restricted definition of ‘harassment’ does not satisfy the ‘hard look’ required by NEPA to examine the further impacts of over-snow vehicle (“OSV”) impacts on wolverines that range from the obvious to the subtle. It would be highly unlikely, for example, for a game warden to know whether a denning wolverine was “harassed” by OSV activity when the wolverine may not be visible. Moreover, subtle effects rising to the level of “harassment” meeting the legal definition for citation by a game warden may be undetectable even if the presence of wolverines were evident.</i></p> <p>Response: The statement about harassment was an attempt to identify that harassment of wildlife by snowmobile is already illegal in the state of Montana and the scale of wildlife being illegally pursued/harassed by people on OSVs under Montana law as known by the MFWP. The number of tickets issued was not utilized to evaluate effects to wolverines. As discussed above in response to comment 148-1, while human disturbance may in general affect wolverine distribution, the highest potential for negative disturbance impacts is theorized to be disturbance at den sites. Based on this rationale, the indicators/measures identified for wolverines as stated on page 96 of the DSEIS, are: acres of denning habitat open and closed to motorized winter recreation and the <u>potential for disturbance</u> from motorized winter recreation (OSVs). The updated FSEIS and the wildlife report on file has a section on potential general effects to wolverines from OSV travel. The wolverine section in the FSEIS has been updated to incorporate additional research. In almost all landscapes, potential effects to individuals were acknowledged but the effects analysis did not show threats to wolverine populations on the Forest from OSV travel. Additionally refer to response to comment 100-67.</p>
148-3	<p><i>The only reference in the draft SEIS to information regarding impacts to wolverines references the wolverine USFWS proposed listing document, stating: “However the proposed rule recognized that high recreational use may coincide with wolverine habitat in some areas, and that there may be some localized small-scale effects to wolverines in these areas. They continue to say that the best scientific information available does not substantiate</i></p>

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	<p><i>recreational activities as a threat to wolverines (USFWS, 2013d). Although there could be small localized effects, the proposed winter motorized travel on the BDNF would not be a threat to the wolverine population.”(SEIS, p151).</i></p> <p><i>This appears to be the bulk of the analysis used when understanding and describing the impacts to wolverines. This is insufficient to meet the minimization criteria under the Travel Management Rule...Dispersed recreational activities, especially winter motorized recreational activities, have the potential to negatively impact wolverine, disrupting and limiting use of natal denning areas (Hornocker and Hash 1981; Copeland 1996; Carroll et al. 2001; Rowland et al. 2003; May et al. 2006; Copeland et al. 2007; Krebs et al. 2007; Ruggiero et al. 2007; Lofroth and Krebs 2007; Inman et al. 2007a). Disturbance from foot and snowmobile traffic have been purported to cause maternal females to abandon or relocate dens (Myrberget 1968; Magoun and Copeland 1998; Inman et al. 2007b). Krebs et al. (2007) found that females tended to avoid areas with heli-skiing and backcountry skiing areas, and Copeland (1996) noted den abandonment after human disturbance. Peak winter recreation activity in central Idaho, for instance, measured as the number of recreationists passing infrared trail-use counters, occurs in February, coinciding with the time female wolverines are selecting and entering dens and giving birth (Heinemeyer et al. 2010). Winter backcountry recreation is one of the fastest growing recreational activities in the U.S. and the northern Rockies (Cook and O’Laughlin 2008). Snowmobiling participants in Idaho doubled between 1995 and 2011 (IDPR 2012). Snowmobiles are now better able to reach areas previously inaccessible due to advanced technology with more powerful snowmobiles. Many of these places in the northern Rockies where winter recreation is experiencing growth spatially overlap suitable wolverine habitat and, more specifically, areas occupied by wolverines (Heinemeyer and Squires 2012; Heinemeyer and Squires 2013; Heinemeyer and Squires 2014; Heinemeyer and Squires 2015; IDFG 2014). Researchers and natural resource managers have expressed concerns about effects of winter recreation on wolverine populations since the 1980s (Copeland 2009). Here, the Forest Service has not done an adequate job of demonstrating that the dispersed recreational opportunities have been designed to address any of these concerns.</i></p> <p>Response: Please see the updated wolverine section in the FSEIS and the wildlife report in the project file which includes the most recent research. The USFWS proposed rule (USFWS 2013b) summarized all research, finding that the best scientific information available does not substantiate recreational activities, including OSV travel, as a threat to wolverines. Additionally, please see responses to comments 99-10 and 148-2.</p>
148-4	<p><i>As snowmobiling and backcountry skiing continue to grow in popularity, there is increasing concern that reproductive habitats may become limiting to</i></p>

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	<p><i>populations due to human disturbance. This is a concern particular regarding reduced snowpack due to climate change. Recent warming has already led to substantial reductions in spring snow cover in the mountains of western North America (Mote et al. 2005; Pederson et al. 2010). Protection of reproductive denning habitat may be critical for the persistence of wolverine.</i></p> <p>Response: Please see the response to comment 100-47.</p>
148-5	<p><i>As described by the Bitterroot National Forest, the Forest Services’ own examination of impacts to wolverines indicates that wolverines are negatively impacted and harassed by OSV activity. This calls out for a much more precise analysis of, and more precise designation of, OSV use and travel constraints. The lack of inclusion of such analysis, provided on an area by area basis as required by the TMR, is inadequate.</i></p> <p>Recommendation (from reviewer): <i>The final SEIS should include a more significant examination of potential impacts to wolverines from winter recreation using the BASI, including the Heinemeyer and Squires (2010; 2012; 2013; 2014; 2015) study and an analysis of how dispersed OSV use meets the TMR criteria.</i></p> <p>Response: We are unable to locate the methodology for an effects analysis using BASI as suggested by the reviewer. We contacted John Squires personally and he was not aware of BASI. The Heinemeyer and Squires 2010 paper does not refer to it. Please see the response to comment 148-2. The wolverine effects section in the FSEIS has been updated to incorporate additional research (Inman, 2013). Although the effects analysis using the latest model portraying wolverine maternal habitat shows potentially more modeled maternal habitat is open to OSV travel, there is still no additional evidence that winter recreation, motorized or non-motorized, has negative effects on wolverines (pers. comm. Inman 2016, USFWS 2013b).</p>
148-6	<p><i>Question of viability: Wolverine population in the area is likely much lower than expected and this is not reflected in impacts analysis...There is no known population trend for wolverines in the BDNF or across their range in the lower 48. It therefore cannot be assumed that wolverine populations are stable nor increasing.... In their 2015 project update, Heinemeyer and Squires (2015) noted the following that indicates this problem:</i></p> <p><i>“We deployed 5 camera-hair snare stations in the Centennial Mountains at sites that were live traps in 2014. These camera traps were run for a total of 399 trap nights between early January and late March 2015. In this second year of focused effort, we again did not detect a wolverine in the Centennial Mountains (Table 1). We also attempted to undertake an aerial track survey in the Centennials in March 2015 but weather prohibited completing the effort. The Centennials historically were known to support wolverines. Inman (2007) reported five mortalities (3 female, 2 males) between 2001 and 2005 in or near the Centennial Mountains; his work represents the last</i></p>

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	<p><i>confirmed observations of wolverines in the mountain range.” (p6)</i></p> <p><i>The apparent loss of wolverine’s has occurred during the time the Revised Forest Plan has been in place, with the current travel management plan. We are concerned that increased winter recreation could be related to this possible localized extinction of what is essential habitat. The Forest Service must at least maintain if not improve current levels of habitat security for wolverines. NFMA clearly requires the Forest Service to maintain a viable population of wolverines on its lands. See 1982 Regs § 219.19. The Forest Service must ensure that the proposed level of OSV use is compatible with maintaining habitat to support a viable population of wolverines. 1982 Regs § 219.19.</i></p> <p>Response: The Heinemeyer and Squires study referred to is a wolverine winter recreation research project, which started in 2009. The Centennial study area is primarily south of the Montana/Idaho border, but does include a small portion of the BDNF. Results have not yet been published for this study. Heinemeyer and Squires (2015) is a project update for the study discussing only the data collection efforts. However, the USFWS Proposed Rule (2013d) considered the ongoing study acknowledging that while dispersed recreation may affect wolverines, significant effects to wolverines from winter recreation remain to be demonstrated scientifically. Specifically, the USFWS considered the preliminary results from the ongoing study on the potential impacts of winter recreation on wolverines in central Idaho finding that they indicate that wolverines are present and reproducing in the area in spite of heavy recreational use, including a developed ski area; dispersed winter and summer recreation; and dispersed snowmobile use (USDI Fish and Wildlife Service, 2013d). Further, we have confirmed with personal communications from Squires that the latest data from the project, to date, continues to support that wolverines are reproducing in high recreational use areas. Your speculation that the monitoring from the project update shows “an apparent loss of wolverine” or that that increased winter recreation “could be related to this possible localized extinction” is not supported by the project, to date. The wolverine section in the FSEIS has been updated however to incorporate additional research. In almost all landscapes, potential effects to individuals were acknowledged but the effects analysis did not show threats to the wolverine population on the Forest from OSV travel.</p>
148-7	<p><i>The impacts assessment for each altyernative and management area in the SEIS deems there might be localized impacts but no impact to the population. However, wolverine numbers are extremely low. Wolverine habitat in the northern Rockies is restricted and disjunct (Aubry et al. 2007; Inman et al. 2013). This impacts wolverine genetic health, as wolverines in the lower 48 have low genetic diversity, high genetic drift, and low connectivity with Canadian populations (Kyle and Strobeck 2001; Cegelski et al. 2006; Schwartz et al. 2009).</i></p>

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	<p><i>Wolverine populations are likely to be even further negatively affected by changes in the spatial distribution of habitat patches as remaining habitat islands become progressively more isolated from each other within this century due to climate changes (McKelvey et al. 2011). This impending habitat and subsequent connectivity loss warrants substantial concern for wolverine persistence in the long-term. Therefore, even one individual wolverine, especially a reproductive female, negatively impacted by human activities, will likely have negative repercussions over time on the genetic health of the overall population.</i></p> <p>Recommendation (from reviewer): <i>Impacts analysis must consider a higher level of concern for very low wolverine populations in the BDNF and the likely reduction in wolverine occupancy that has occurred under the current forest plan. The BDNF should thus take a conservative approach when assessing and minimizing impacts to wolverines from winter recreation.</i></p> <p>Response: Please see the response to comment 148-2.</p>
148-8	<p><i>Additionally, in Montana Natural Heritage Program sightings reports found online at MFWP’s Field Guide (fieldguide.mt.gov) there have been extremely few sightings in the last few years on the BDNF as compared to earlier in the 2000s. This could in part relate to levels of reporting effort, but it still warrants further examination whether wolverines continue to persist on the BDNF and if they do not, all care must be taken to reduce risks to enable a better influx of wolverines to establish a stronger population.</i></p> <p>Response: Wolverines do occur on the BDNF. Inman (2013) had radio and GPS collars on wolverines in the Madison and Gravelly mountain ranges from 2001 – 2010. His habitat model was based on these locations, as well as others in the Greater Yellowstone area. The wolverine effects section in the FSEIS has been updated to incorporate additional research (Inman, 2013). Additionally please see response to comment 99-10.</p>
148-9	<p><i>The BDNF serves as a major wolverine connectivity zone and must remain as such. The following figure from Schwartz et al. (2009) demonstrates that the Centennial and Beaverhead Mountain Ranges within the BDNF serve as a vital travel route that connects wolverines in South-central Idaho and Greater Yellowstone with wolverine populations in northern Montana, Idaho, and in Canada. Note that the primary wolverine movement paths shown in orange include alpine terrain that may currently receive little or no disturbance from motorized recreation, but such use is allowed by the current plan decision (specifically, the West Big Hole and Lima Tendoy Landscapes, plus the Mount Jefferson area at the southeastern extremity of the Gravelly Landscape). Given these scientific findings, it appears that maintaining wolverines on the BDNF is vital to maintaining the species in Idaho and Greater Yellowstone, with major implications to the entire Northern Rockies population.</i></p> <p>Recommendation (from reviewer): <i>Reduce motorized travel on the BDNF</i></p>

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	<p><i>particularly along wolverine corridor areas.</i> Response: Thank you for your recommendation. Please see the response to comment 99-10.</p>
148-10	<p><i>The BDNF must additionally include an analysis of how trapping pressure facilitated by access is impacting wolverines, both in terms of harassment and incidental capture and future possible resumption of wolverine trapping in Montana</i> Recommendation (from reviewer): <i>Analyze the number of miles of roads and trails open to motorized use within wolverine primary habitat as it relates to access for trapping.</i> Response: In 2012-2013, the wolverine trapping season was closed (Giddings 2014). The MFWP website accessed 3/29/16 states that, “Wolverine trapping season will remain closed for the foreseeable future.” We have no information on incidental trapping of wolverine.</p>
148-11	<p><i>To minimize impacts to wolverines now well described in our comments above, we urge the following:</i> <i>-Close all Wilderness Study Areas to OSVs. Most of these contain significant wolverine maternal denning habitat. The West Pioneer WSA is especially comprised of wolverine habitat that should be better protected.</i> Response: There are two WSAs on the Forest – Sapphire Mountains WSA and the West Pioneer WSA. Both of these WSA contain minimal modeled wolverine denning habitat as compared to other areas. Further, under Alternative 6 Modified much of the Sapphire Mountains WSA is closed to OSV. The Frog Pond Basin portion of the WSA is open to OSV use and is the area most used by OSVs. The Frog Pond Basin area does not include wolverine denning habitat. The West Pioneers WSA is open to OSV use. However, it is the East Pioneers, outside of the WSA, which is closed to OSV use that includes substantial wolverine denning habitat. Wolverine denning was one of the reasons these areas in the Pioneer Landscape were closed. Regardless, analysis and research shows that while dispersed recreation may affect wolverines, significant effects to wolverines from winter recreation remain to be demonstrated scientifically (USFWS 20130d). Please see responses to comments 99-10, 148-2, and 148-6.</p>
148-12	<p><i>To minimize impacts to wolverines now well described in our comments above, we urge the following...</i> <i>Further restrict motorized use in wolverine habitat in the Tobacco Root Landscape, Pioneer Landscape (the western portion), Clark Fork/Flints Landscape, Lima Tendoy Landscape, and Big Hole Landscape. These are highly important areas with too much maternal denning habitat made vulnerable to current and future increasing OSV activity levels. We urge the BDNF to manage wolverine habitat (as mapped in Inman model) in these areas as non-motorized year-round to preserve their outstanding values to provide secure wildlife habitat and quiet recreation.</i></p>

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	<p>Response: Thank you for your recommendation. Please see the response to Comments 99-10, 148-2, and 148-6.</p>
148-13	<p><i>To minimize impacts to wolverines now well described in our comments above, we urge the following...</i></p> <p><i>Prohibit OSVs in the Mount Jefferson Roadless Area. The current plan allows Further restrict motorized use in wolverine habitat in the Tobacco Root Landscape, Pioneer Landscape (the western portion), Clark Fork/Flints Landscape, Lima Tendoy Landscape, and Big Hole Landscape. These are highly important areas with too much maternal denning habitat made vulnerable to current and future increasing OSV activity levels. We urge the BDNF to manage wolverine habitat (as mapped in Inman model) in these areas as non- motorized year-round to preserve their outstanding values to provide secure wildlife habitat and quiet recreation. OSVs in the upper Hellroaring drainage – this should be closed to OSVs to benefit wolverines and other wildlife and would protect the BLM Wilderness Study Area. As seen in Figures 1, 2, and 4, this area provides important denning habitat for wolverines, serves as an important wolverine travel corridor between Bitterroot Divide and Greater Yellowstone area; and serves as an important wolverine travel corridor between Centennials and the Gravelly and Madison Ranges to the north. The proposed boundary between the Mount Jefferson Roadless Area and the Centennial Recommended Wilderness Management Area has been shown repeatedly to be very difficult to enforce; The Mount Jefferson area is surrounded on three sides by habitat designated occupied lynx habitat (USDA 2007, Fig 1-1), and managing the area as a proposed Wilderness, and excluding OSV use is the best way to ensure against harm to both wolverines and federally listed lynx.</i></p> <p>Response: Thank you for your recommendation. Please see the response to comment 99-10, 148-2, and 148-6 related to the wolverine. In reference to lynx, the BDNF remains unoccupied. Further the Lynx Amendment did not include or identify any need for dispersed over-the-snow winter recreation restrictions. The management direction focuses on expansion of designated routes and play areas. None of the alternatives increase or change recreation developments or operations, or change existing designated routes or designated play areas. Alternatives 2, 3, 5 and 6 Modified are in compliance with the NRLMD, and the reduction of acres open for OSV travel in these alternatives result in fewer potential impacts to lynx or lynx habitat. In addition, please see response to comment 99-35 and the updated lynx section of the FSEIS.</p>
148-14	<p><i>The draft SEIS in its effects analysis for lynx noted that:</i></p> <p><i>“Preliminary information from winter recreation studies in Colorado indicates that some recreation uses are compatible, but lynx may avoid some developed ski areas” (Interagency Lynx Biology Team, 2013). This SEIS only concerns dispersed recreation, not developed ski areas.” (SEIS, p.127).</i></p>

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	<p><i>However, the Colorado winter recreation study referenced above involving dispersed recreation has also preliminarily found that lynx appear to change their activity levels temporally in relation to human activity – which may negatively impact the physiological health of lynx with implications on productivity of the population (J. Squires, pers.comm. 2016).</i></p> <p>Response: We considered the preliminary information from the Colorado study in our analysis and we are not aware of the personal communication with John Squires as claimed in this comment regarding preliminary conclusions. We made an inquiry to John Squires regarding the study and received from him an email on April 15, 2016 that they are working full time on the lynx-rec final analysis and they hope to complete the modeling in a few weeks. Potential effects from OSV travel were identified in the DSEIS starting on page 128. It also noted that the BDNF is within unoccupied secondary/peripheral habitat rather than occupied habitat where the studies are being conducted. Additionally, see responses to comments 99-35, 148-13 and the updated lynx section in the FSEIS.</p>
148-15	<p><i>The SEIS notes that “Since there have been no recent sightings of lynx on the BDNF, probability of lynx being affected on the Forest by winter motorized travel project is low.” A description of the extent of lynx monitoring would be useful here to show the level of effort the BDNF has applied to find the species. Simply because observation records are relatively low in numbers does not mean animals are not there – it could equally indicate that sampling effort was low or there were relatively few people moving about the area to document lynx. We encourage the Forest to survey more frequently and assiduously for lynx if they are to claim that a lack of observations concludes a lack of lynx occurrence and thus impacts. Moreover, the absence of lynx may be as much a function of poor habitat management practices that discourage occupancy by lynx as whether lynx would otherwise be present with appropriate management direction.</i></p> <p>Response: There have been no verified lynx sightings on the Forest since the mid-late 1990s, with the exception of six lynx transplanted in Colorado. Between 2004 and 2007, six of the relocated individuals were found traveling through the BDNF, however none of them stayed on the Forest (Devineau et al. in 2010). Many surveys attempting to verify lynx presence on the BDNF have been completed: Squires et. al. in 2003, Berg in 2009, and Wildthings (Porco) in 2009. From 2012 through 2014, the Forest Service conducted lynx surveys following the National Lynx Detection Protocol (McKelvey et al, 2000) in some of the most likely lynx habitat on the forest. To date no lynx have been verified (Fletcher, 2013, Pilgrim and Schwartz, 2014, 2015). Additionally please see the updates lynx section in the FSEIS.</p>
148-16	<p><i>Lynx are wide-ranging species, and the BDNF borders occupied lynx habitat on the Targhee, Gallatin, Helena, and Lolo National Forests (USDA 2007). Thus, it</i></p>

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	<p><i>is highly likely that the BDNF is or will be occupied by Canada lynx during the life of the forest plan, in which case the forest plan decision may affect lynx. Additionally, since new data may change the current “unoccupied” status of the BDNF at any time, we believe it is appropriate to apply the NRLMD. The NRLMD states “that “management actions could adversely affect unoccupied secondary lynx habitat” and furthermore “if and when lynx attempt to establish home ranges in secondary areas, individual lynx could be affected” (USDA 2007).</i></p> <p>Recommendation (from reviewer): Incorporate management direction from the NRLMD to protect lynx.</p> <p>Response: The effects for Canada lynx section in the DSEIS starting on page 128 incorporated the NRLMD direction.</p>
148-17	<p><i>Grizzly bears can be susceptible to disturbance at their den sites, can be easily awakened and disturbance has been found particularly in the spring when females and cubs of the year are still present (Mace and Waller 1997). We are concerned that significant portions of modeled grizzly bear denning habitat are proposed for over-snow motorized vehicle. The BDNF should use the denning habitat model to avoid conflicts with grizzly bears.</i></p> <p>Response: The Forest consulted with USFWS on grizzly bear for activities in the Forest Plan, including OSV travel. There was no requirement from USFWS to further reduce the OSV travel. The USFWS Biological Opinion discusses concern with den emergence and not impacts to bear while denning as there is little likelihood of overlap between OSV use and denning sites, which occur in timbered areas and steep slopes. The service stated that, “The magnitude of impacts during the denning period...would not likely reach levels that would result in any injury to grizzly bears.” (USFWS 2013b). In terms of den emergence, potential impacts to grizzly bears from OSV use are primarily focused on effects to grizzly bears as they leave their dens and specifically sows with cubs not on denning bears. Effects are reduced by closing OSV travel after May 15. Additionally please see the response to comment 99-29.</p>
148-18	<p><i>Recognizing that while grizzly bears are currently most likely in the Madison and Gravelly areas the entire BDNF is important to future connectivity for grizzly bears moving between the Northern Continental Divide ecosystem (NCDE) and the currently isolated Greater Yellowstone ecosystem (GYE). Boyce et al. (2001) demonstrated the importance of multiple “connected” populations to the survival of the grizzly in the Northern Rockies, and metapopulation theory directs that connectivity is the best long-term strategy to increase the resiliency and probability of persistence of remaining grizzly bear populations in the lower 48 States (Boyce 2000). By addressing habitat security concerns proactively the BDNF could serve as a much needed stepping stone between these populations. For example, in 2014 BDNF issued a Forest Wide Food Storage Order (36 CFR 261.58) recognizing current and future grizzly bear occupancy. The Forest should be just as proactive in addressing motorized</i></p>

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	<p><i>winter use as it pertains to grizzly bears.</i></p> <p>Response: The Draft SEIS analyzed OSV use on grizzly bear denning habitat and the potential for disturbance across the entire forest (by landscape and by alternative), including areas inside and outside wilderness and recovery areas. Grizzly bear habitat connectivity and security when bears are outside their den is a summer/fall issue. The USFWS Biological Opinion states: “the primary concerns with motorized winter recreation with respect to grizzly bears are the potential effects associated with denning, den emergence, and spring habitat.” (USFWS 2013b). Summer and fall habitats are not at issue since snowmobiling would not overlap with these seasons. OSV effects on spring habitat do not relate to connectivity because, during this time of year grizzly bears are not traveling across wide areas, rather most emerging bears move immediately to a known, reliable spring food source (USFWS 2013b). The BDNF forest plan, which was consulted on with USFWS, manages connectivity and secure areas through open motorized road and trail densities (OMRTD) during the summer (5/16-10/14) and fall seasons (10/15-12/1). Winter motorized use is managed by areas open and closed to that use. Please see the updated FSEIS grizzly bear section in reference to winter motorized travel. Additionally please see the response to comment 148-17.</p>
148-19	<p><i>The BDNF should close OSV use April 1st rather than May 15th in all modeled grizzly bear denning habitat, to minimize disturbance to grizzly bears during spring emergence and recognizing that bears typically begin to emerge from their dens in March. In addition the BDNF should reduce OSV use in modeled grizzly bear denning habitat across the forest throughout the denning season (Oct/Nov entering dens, March/May emerging). At this time all Alternatives still provide for significant OSV use in or across denning habitat despite the potential for conflict.</i></p> <p>Response: Thank you for your recommendation. The USFWS stated in the Biological Opinion, “Although snowmobiling would be permitted until May 15, spring snowmobiling areas and spring grizzly bear habitat are almost mutually exclusive in that the areas that would be suitable for spring snowmobiling (i.e. more snowpack) would not typically overlap with spring grizzly bear habitats.” However it was also acknowledged that there could be effects to females with cubs. However, in the conclusion the USFWS states, “... the Service does not expect impacts to spring habitat and foraging grizzly bears to rise to the magnitude that would injure grizzly bears.” (USFWS 2013b). There is no requirement from USFWS to close OSV travel on April 1st. Additionally, please see the response to comment 148-17.</p>
148-20	<p><i>For example in the Clark Fork – Flints, an area that has had occasional grizzly bear sightings, Alt 6 Modified would still allow for 89% of denning habitat to be open to OSV (SEIS p.109) and recognizes the potential for conflict. By minimizing OSV use in denning habitat the BDNF would be acting proactively</i></p>

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	<p><i>rather than reactively to grizzly bear expansion.</i></p> <p>Response: Thank you for your recommendation. Please see the responses to comments 99-10, 99-29, 100-11, 148-17.</p>
148-21	<p><i>While the much of the BDNF has the potential to provide for connectivity of grizzly bears, the Pioneer landscape could provide a significant patch of connectivity habitat that grizzly bears can use between to access other sections of the forest and thereby assist with movement between the ecosystems. The western portion of the Pioneer landscape identified as having regular OSV use in the map “Post-2010 ROD” (SEIS P. 26) also has a significant amount of modeled grizzly bear denning habitat. As proposed, Alternative 6 allows for 74% of this landscape to be used for winter motorized travel with 71% of this modeled as potential grizzly bear habitat. Within the West Pioneer Wilderness Study Area, OSV use is allowed off designated routes from December 2 - May 15 (36 CFR, Section 261.56).⁴ To provide for some winter habitat security, OSV use within the WSA should be regulated to designated trails and the area should close to OSV use on or before April 1st. Right now they are allowed off designated routes Dec 2-May 15 http://www.fs.usda.gov/detail/bdnf/alerts-notices/?cid=stelprdb5051987.</i></p> <p>Response: Thank you for your recommendation. Please see the response to comment 148-18. In reference to the April 1 date, please see the response to comment 148- 19.</p>
148-22	<p>Recommendations (from reviewer): <i>Close OSV use April 1st rather than May 15th in all modeled grizzly bear denning habitat. Reduce OSV use in modeled grizzly bear denning habitat across the forest throughout the season. Regulate OSV use in the West Pioneer Wilderness Study Area to designated trails and close it to OSVs on or before April 1</i></p> <p>Response: Thank you for your recommendation. Please see the response to comment 148-19.</p>
148-23	<p><i>We offer the following recommendations to improve the SEIS to minimize harassment to wolverines...</i></p> <ul style="list-style-type: none"> • <i>Use a more up-to-date wolverine habitat model such as the Inman model. Include effects analysis to both primary and maternal wolverine habitat.</i> • <i>The final SEIS should include a more significant examination of potential impacts to wolverines from winter recreation using the BASI, including the Heinemeyer and Squires (2010; 2012; 2013; 2014; 2015) study and an analysis of how dispersed OSV use meets the TMR criteria.</i> • <i>Impacts analysis must consider a higher level of concern for very low wolverine populations in the BDNF and the likely reduction in wolverine occupancy that has occurred under the current forest plan. The BDNF should thus take a conservative approach when assessing and</i>

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	<p><i>minimizing impacts to wolverines from winter recreation.</i></p> <ul style="list-style-type: none"> • <i>Reduce motorized travel on the BDNF particularly along wolverine corridor areas.</i> • <i>Analyze the number of miles of roads and trails open to motorized use within wolverine primary habitat as it relates to access for trapping.</i> • <i>Close all Wilderness Study Areas to OSVs.</i> • <i>Further restrict motorized use in wolverine habitat in the Tobacco Root Landscape, Pioneer Landscape (the western portion), Clark Fork/Flints Landscape, Lima Tendoy Landscape, and Big Hole Landscape.</i> • <i>Prohibit OSVs in the Mount Jefferson Roadless Area.</i> <p>Response: Thank you for your recommendations. Please see the response to Comments 99-10, 100-63, 148-1, 148-5, 148-6, 148-10, 148-11, 148-12 and 148-13.</p>
148-24	<p><i>We offer the following recommendations to improve the SEIS to minimize harassment to Canada lynx.</i></p> <ul style="list-style-type: none"> • <i>Incorporate management direction from the NRLMD to protect lynx.</i> <p>Response: Thank you for your recommendation. The effects for Canada lynx section in the DSEIS starting on page 128 incorporated the NRLMD direction.</p>
148-25	<p><i>We offer the following recommendations to improve the SEIS to minimize harassment to...grizzly bears.</i></p> <ul style="list-style-type: none"> • <i>Close OSV use April 1st rather than May 15th in all modeled grizzly bear denning habitat.</i> • <i>Reduce OSV use in modeled grizzly bear denning habitat across the forest throughout the season.</i> • <i>Regulate OSV use in the West Pioneer Wilderness Study Area to designated trails and close it to OSVs on or before April 1st.</i> <p>Response: Thank you for your recommendation. Please see the response to comment 99-29, 100-10, 100-69, 148-17, 148-18, 148-19.</p>
149-1	<p><i>The EPA recommends that the impact analysis of OSV use in the BDNF be expanded to more fully relate current and expected future conditions to management goals for big game. While management objectives and current population numbers were provided for elk, goals were not provided for any other species analyzed in the SEIS. Except for the elk populations, which exceed the stated objectives, it is unclear what the current species population numbers reflect in terms of species health. For instance, we located bighorn sheep population objectives in the Montana Fish, Wildlife & Parks' (MFWP) 2010 Bighorn Sheep Conservation Strategy. The only BDNF landscape meeting those population objectives is the landscape with no snowmobile use, the Madison Landscape. Therefore, we recommend that available objectives or estimates of healthy population numbers, and a statement on whether those objectives are being met, be included in the impact analysis for each of the wildlife species</i></p>

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	<p><i>evaluated in the SEIS.</i></p> <p>Response: The Forest Service does not set management goals for animal populations. The State of Montana is responsible for setting population objectives for big game. Population objectives, where available, were added into the FSEIS. Please see the response to comment 99-10. There are many reasons why populations may be under objective (Pers. com. MFWP 2016). MFWP biologists interviewed were specifically asked if there were any concerns with OSV travel in areas where big game herds are currently below objectives. They responded that their experience and on the ground knowledge is not suggesting that snowmobile use is limiting any of the big game populations.</p>
149-2	<p><i>Additionally, it would be useful to evaluate whether winter ranges and/or denning habitat for any species analyzed may currently be limited due to snowmobile use.</i></p> <p>Response: This question was specifically asked to all MFWP biologists and their experience and on the ground knowledge is not suggesting that OSV use is limiting winter range. The big game section in the FSEIS has been updated with landscape level site-specific comments from MFWP biologists.</p>
149-3	<p><i>We also recommend that the alternatives analysis more clearly define direct and indirect effects to the ecological resources being analyzed and the methods or measured used to evaluate the effects. The Draft SEIS includes two indicator that were evaluated in order to analyze effects to big game wildlife: (1) Acres/location of winter range open and closed to motorized winter recreation, and (2) Potential for disturbance from motorized recreation (OSV's). The first indicator is the management decision being considered that could have effects on big game wildlife. The second indicator is the main effect to big game wildlife that could result from the management decisions being evaluated, but the method or metric for assessing the potential for disturbance in the SEIS is unclear. While the potential disturbance is described in terms such as "likely" and "unlikely", it is not always clear how these conclusions were made. In various places, the Draft SEIS states that:</i></p> <ul style="list-style-type: none"> • <i>No winter range areas have been affected by winter motorized travel,</i> • <i>OSV use has not been identified as an issue for populations of individual species, or</i> • <i>No declines in a population due to OSV use have been identified.</i> <p>Response: As the MFWP biologists were not available for in-depth interviews before the draft was written, the OSV use pattern map (DSEIS Figure 8, page 25) was overlaid on each individual species' winter range maps (DSEIS Appendices A-C) and then overlaid on the alternative maps (DSEIS Figure 1 and Figures 3-7) to assess the potential for disturbance. This was a very conservative look at potential effects to wintering big game. After the draft was published, we obtained more detailed information as MFWP biologists across</p>

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	the Forest were interviewed and the big game section of the FSEIS has been updated with their landscape level, site-specific comments. Additionally please see the response to comment 99-10.
149-4	<p><i>We recommend that the NEPA document describe the Forest Service’s analytical approach in making these determinations. In some sections, the reader is referred to MFWP reports or informed that MFWP biologists were queried on the matter, but in other sections, there are no references. Understanding the Forest Service’s analytical methods is especially important where population numbers for a species are not available, there are state-wide or regional declines that have been documented (e.g., in the case of moose), or where there is disturbance in some of the winter range. Where possible, having a systematic protocol for analyzing effects allows for more consistent analysis of alternatives and resources. This helps the reader understand the impacts and compare alternatives with respect to their environmental impacts.</i></p> <p>Response: Please see the responses to comments 99-10 and 149-3.</p>
149-5	<p><i>The Draft SEIS states that estimated elk numbers on the BDNF have increased, which is relied upon as evidence that snowmobile use is not having adverse effects on the resident elk population. However, based upon the estimated population numbers provided for other big game wildlife on the BDNF, as well as related references, antelope numbers decreased between 2011 and 2015 by 24.3% white-tailed deer numbers were below the 10 year average by 16.4%, statewide decreases in moose have been indicated, and bighorn sheep are not meeting population objectives except in the hunting districts with no snowmobile use. In the cases where there is disturbance in a species’ winter range, it may be useful to make detailed comparisons between the alternatives in terms of observed disturbance. We recommend that the Final EIS describe the available information on disturbance in each landscape, the effect of that disturbance, and whether there are specific areas where disturbance is more evident to the consequences have been greater. Such information could be helpful in evaluating the effects of each alternative.</i></p> <p>Response: Please see the responses to comments 99-10 and 149-3, which discuss interviews with MFWP biologists regarding their observed effects of OSV use in big game winter range.</p>
149-6	<p><i>Application of Minimization Criteria (in 2005 Travel Management Rule)...The Draft SEIS indicates there is little evidence of effects from OSV use on forest resources, including but not limited to soil, watershed, and vegetation resources. Further, it is stated that “No specialists on the Forest have observed impacts to soil and vegetation from OSV use during low snow conditions where impacts did not fully rehabilitate the following growing season.” However in the 2009 Final EIS, we note an apparent contradiction that we recommend be clarified in the Final SEIS:</i></p> <p><i>Topic 4: Recreation and Travel Management. Technology and popularity of</i></p>

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	<p><i>motorized vehicle, particularly winter recreation, has increased. For much of the forest, this use has evolved over time rather than evolved with management. This has resulted in resource damage, wildlife conflicts, and conflicts between user groups.</i></p> <p><i>If there has been documented resource damage, it would be helpful to note whether the impacts are due to distance between winter motorized routes/areas and streams, sensitivity of existing soils or vegetation to disturbance, sediment loading to streams, or other factors. This information will help determine opportunities to mitigate or avoid the impacts and inform a better decision.</i></p> <p>Response: Revision Topic #4 (from the 2009 ROD) is the key issue statement from the 2009 FEIS. It was written prior to publication of the 2005 DEIS and reflects proposed needs for changes in management occurring since approval of the 1986 and 1987 Forest Plan. Key issues drove the development of alternatives (2009 FEIS, pg. 13) proposed for revising the 1986 and 1987 Forest Plan direction. Rather than allow winter recreation to continue evolving in the absence of Forest Plan direction, the revised Forest Plan analyzed alternatives with differing management direction, primarily prohibiting OSV use in non-motorized allocations. The non-motorized allocations assist the Forest in managing the impacts from OSV use by protecting wilderness attributes in Recommended Wilderness Areas, providing opportunities for non-motorized recreation in the absence of motorized recreation, protecting certain areas with wolverine denning habitat, etc. Revision Topic 4 was not intended to prevent every potential impact from OSV use. Rather, it was used to develop and analyze alternative to provide Forest Plan level management direction so OSV use did not continue to evolve in the absence of management direction.</p>
149-7	<p><i>Monitoring and Mitigation:</i></p> <p><i>OSV use has increased significantly over the last 15 years and the SEIS predicts that use will continue to increase. New technology allows snowmobiles to access areas further into the forest than they could historically. As use intensity increases and technology evolves, it will be important to assure that unanticipated impacts are noted and quickly addressed. High elevation, shallow-soil ecosystems are particularly sensitive to disturbance and they are slow to restore due to the short growing season. Additionally, as snowmobiles become more powerful, their pollution and noise emissions generally increase, and with concentrated use, local air quality and the natural soundscape may also become impacted. Therefore, we recommend that the Final SEIS establish a monitoring and adaptive management plan for sustaining or improving winter season environmental conditions (e.g., for alpine vegetation, air quality, wildlife disturbance, and wilderness character).</i></p> <p>Response: The monitoring and closure ability under the travel management rule designation process gives the tools necessary to deal with future</p>

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	<p>conditions and use in terms of monitoring and adaptive management. 36 C.F.R. 212.50 et. seq. See, in particular, 36 C.F.R. 212.57 and 36 C.F.R. 52(b).</p>
149-8	<p><i>As part of the adaptive management plan, we recommend establishing specific management decision points based upon minimum desired environmental conditions (thresholds) in the BDNF, and providing an explanation of how the Forest Service selected the thresholds. We also recommend including a commitment to management actions if monitoring indicates an impact has exceeded a threshold. For example, the adaptive management plan may include patrolling or installing signs at heavily used trailheads to encourage users to limit OSV idling.</i></p> <p>Response: The Forest Plan provides a description of desired future condition, goals and objectives for all resources on the BDNF. Chapter 5 is the monitoring plan for the Forest Plan. The recommendation described here is appropriate for site-specific, project level analysis, not Forest Plan analysis that addresses all resources and all land uses on 3.38 million acres. For the example in this comment, this type of monitoring is appropriate for discussion and review when analysis is completed for maintenance, operation, construction of reconstruction of site-specific trailheads.</p>
149-9	<p><i>We also recommend that the BDNF consider development of an inspection and enforcement strategy or program to assure that snowmobiles are abiding by motorized vehicle access limitations and avoiding damage to aquatic and terrestrial resources. This program could be similar to what is being carried out on Mount Jefferson.</i></p> <p>Response: Assisting in enforcement of motorized closures is the responsibility of all field going agency employees. We also hire winter snow rangers who specifically patrol selected areas for educational purposes and work with law enforcement officers. Naturally, as education and enforcement activities become effective in one area, other areas are selected for an increased agency presence. Priority setting for these actions are best achieved on an annual basis following review of prior year actions and available financial resources.</p>
149-10	<p><i>Finally, we encourage the Forest Service to involve the public and interested stakeholders to continually evaluate the effectiveness of the adaptive management plan and resource protection improvements.</i></p> <p>Response: Stakeholders, including both motorized and non-motorized advocates and other agency specialists (such as MFWP wildlife biologists) are welcome to provide input as to their on-the-ground observations at any time. These observations are frequently viewed as very beneficial because agency employees cannot be everywhere at all times. This type of coordination with stakeholders is exactly what has occurred for monitoring of OSV use in the Mt. Jefferson area.</p> <p>In addition, the agency continues to work with user groups and the State of Montana developing educational material for ethical outdoor recreation</p>

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	practices.
149-11	<p><i>We support Forest Service policies that prohibit off-trail snowmobile use until at least six inches of snow has accumulated. Snow in higher elevation areas is susceptible to wind movement which can leave bare or thinly covered areas that would be difficult or impossible to avoid given the speed of snowmobiles. We suggest the BDNF consider defining specific conditions under which areas would be closed due to thin snow conditions or unique wildlife hibernation or movement patterns.</i></p> <p>Response: Thank you for your recommendation. The big game section has been updated in the FSEIS to include additional site specific information. The grizzly bear and wolverine sections have also been updated in the FSEIS. For wildlife issues please see the response to comment 99-10. Please see responses to comments 99-14, 99-38 and 99-50 discussing that from on-the-ground knowledge OSV use on the BDNF in the presence of inadequate snow cover is not occurring to the extent we can geographically identify locations where there are impacts. If impacts do occur the monitoring and closure ability under the travel management rule designation process gives the tools necessary to deal with future conditions and use. 36 C.F.R. 212.50 et. seq</p>
149-12	<p><i>The EPA rates the Forest Service’s preferred alternative, Alternative 6 Modified, as “EC-2” (Environmental Concerns-Insufficient Information). The “EC” rating means that the EPA’s review has identified potential impacts that can be avoided in order to fully protect the environment. The “2” rating means that the Draft SEIS does not contain sufficient information to fully assess environmental impacts. We recommend that the identified additional information, data, analyses, or discussion be included in the Final SEIS.</i></p> <p>Response: As appropriate, EPAs recommendations have been added to the Final SEIS.</p>
150-1	<p><i>I have snowmobiled the Mt Jefferson area several times and have enjoyed the prized snowmobiling opportunities offered there. Snowmobiling has been an important part of my winters. It allows me and my friends to get out and enjoy the great snow and winter beauty. By using a snowmobile we can get a long distance from the road and enjoy areas most people can only dream about.</i></p> <p>Response: Your views are noted.</p>
150-2	<p><i>There are not justifiable reasons to restrict winter recreation based on big game winter range issues. Elk are “at or above population objectives” and the elk population across the Forest has GROWN from 28,229 in 2007 to 48,863 in 2015. DSEIS at 97. The USFS acknowledges “that forest wide, winter motorized travel is not affecting elk populations. OSV travel “has not been identified as an issue for mule deer or moose populations across the Forest. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and “there are no known cases of conflict with mountain goats as a result of winter</i></p>

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	<p><i>recreational activities on the BDNF.”</i> Response: Please see the response to comment 153-4.</p>
150-3	<p><i>There are no justifiable reasons to restrict recreation based on concerns about lynx or wolverine. “We are unable to identify any discernible effects to lynx on any of the landscapes” says the USFS. DSEIS at 129. For wolverine, specialists “continue to say that the best scientific information available does not substantiate recreational activities as a threat to wolverines.” DSEIS at 151.</i> Response: Please see the response to comment 153-5.</p>
150-4	<p><i>The District of Montana and the Ninth Circuit courts both UPHELD the earlier 2009 plan for Mount Jefferson. The court orders do not compel closure of Mount Jefferson. In truth, it would contradict the orders to rely on them as a basis for restricting long-continuing snowmobile riding at Mount Jefferson.</i> Response: Please refer to the response to comment 134-3.</p>
150-5	<p><i>The DSEIS does not contain data or analysis that would support restrictions or closure of Mount Jefferson to snowmobiling. The USFS acknowledges that “[c]onflicts among uses are not about physical confrontations between users in the field; it is more about personal values and perceptions of motorized versus non-motorized uses.” DSEIS at 155.</i> Response: Please refer to the purpose of this SEIS (SEIS, pg. 6). After evaluating potential impacts on resources cited in the minimization criteria, the responsible official will decide if an amendment to the Forest Plan is needed or whether site specific changes, including changes to the management of Mount Jefferson are needed.</p>
150-6	<p><i>The DSEIS contains no information about unique concerns at Mount Jefferson or a trend toward some unacceptable threshold of “illegal” use. Rather, use “has been monitored every year since 2001, documenting motorized intrusions into the closed area each successive year.” DSEIS at 156. The prior decision, which was upheld by the courts, should remain in place. Please do not restrict snowmobile use in the Mount Jefferson area.</i> Response: Please refer to the responses to Comments 134-3 and 150-5.</p>
151-1	<p><i>Impact on winter motorized use on big game. The Supplemental EIS states the following... Concerning the preceding two paragraphs and other areas of the SEIS. The subject of snowmobile use in relation to big game I have noticed that Mountain Lions were not mentioned. Mountain Lions are considered a Big Game species in Montana, and the lion hunting/chase season is well within the winter season as defined by the Forest Plan. Lions depend on deer and elk as their primary food source, and thus follow deer and elk to their winter ranges. It is not difficult to figure that where there are deer and elk, there will be lions, and if there is a lion hunting/chase season, there will be hunters. Lion Hunting is very dependent on motor vehicle use, be it wheeled, by snowmobile, or one of the many types of over snow vehicle (OSV) as defined by Forest Service</i></p>

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	<p><i>regulation 36 CFR 212.1.</i></p> <p>Response: We understand this comment to refer to a lack of analysis of the effects of lion hunting to big game. MFWP does not identify winter range for mountain lions. However, three of the MFWP biologists interviewed were asked specifically about effects to big game from mountain lion hunting via OSVs. In their experience, mountain lion hunters use OSVs very rarely. Although there may be some OSV use, generally the hunters drive vehicles on roads then follow the hounds on foot/snowshoes. They did not see lion hunting with OSVs as an issue for big game winter range.</p>
151-2	<p><i>The effects of snowmobiles on wolves was briefly mentioned from the standpoint of harassment, and it was stated that snowmobile use was not affecting the wolf population. There was nothing revealed by the Forest Service that would substantiate their position. I would point out the following excerpt from the internet. “Every year, a majority of wolves are harvested during the state’s 5-week general deer and elk season. This is mainly due to the sheer number of hunters in the field. Slowly the trappers are starting to even the score. Once December and January roll around, you should be focusing your efforts on migrating or winter elk and deer herds in the western or southwest portions of the state. The use of snowmobiles or snowshoes is a must while trying to locate a group of these marauders. You have to be able to cover as much country as possible.” https://www/huntingfool.com/blog/one-of-the-toughest-hunts-ou-there-montana-wolves/ Just like lions, and lion hunting season, wolves and their hunting seasons are sure to play a role in the welfare of deer and elk during the winter. Winter motorized use be it by wheeled, snowmobile, or OSV is worth much more than a passing unsupported comment.</i></p> <p>Response: During the original Forest Plan revision, gray wolves were on the BDNF Threatened and Endangered species list. As such the BDNF consulted with USFWS on effects to gray wolves from the Forest Plan. A Biological Opinion (BO) was received by the Forest and is in the project file. The Draft SEIS stated that winter motorized recreation was not identified as a major issue for wolves. The USFWS also stated that, “the effects of the proposed revised Forest Plan on gray wolves are not likely to jeopardize the continued existence of this species.” The gray wolf section was updated to include additional language from the BO.</p> <p>The MFWP wolf specialists responsible for half of the BDNF was interviewed. According to him, most wolves are generally hunted during the big game general rifle season and most often harvested opportunistically. Although there is no good way to identify how many hunters were on the BDNF actively hunting wolves with snowmobiles, in 2015 205 wolves were harvested across the entire state of Montana. Of those, only 37 were harvested in the units that the BDNF is within. Of that subset, most were harvested before the snowfall on private land in the valleys. In his experience, similar to mountain lion hunters,</p>

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	<p>although there are some wolf hunters utilizing OSVs, they are a very small part of the OSV users on the Forest. He has not seen an issue with wolf hunters on OSVs affecting big game on the winter range.</p>
151-3	<p><i>Within the SEIS the forest uses a state definition of wildlife harassment from a snowmobile, and the Forest tries to back up a claim that harassment is not an issue by reporting that there have been only five tickets written by Montana Fish Wildlife and Parks between the years of 1980 and 2015. The problem here is that definition of harassment is a state definition specific to snowmobiles. Winter motorized use and the analysis of such use should include wheeled and the various forms of over snow vehicles. Montana has wildlife management areas that are closed to all uses during the winter to protect the wildlife from activities that would be considered harassment and detrimental to the welfare of wintering wildlife. I would suggest that the forest find a better definition of harassment that would address the actual effects of all winter motorized use. Perhaps something similar to the definition of wildlife harassment as defined by the Endangered Species Act. Note the following:</i></p> <p><i>“At the core of the case was meaning of the term “harass: under the ENSCA. The term was not defined anywhere in the state statute. The court turned to an analogous Federal statute, the Endangered Species Act (ESA), to assist it in its interpretation of the State statute. In the federal statute, the term “harass” is defined as “an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering.” The Court used the federal ESA definition of “harass” and determined that the term “harass” meant an “intentional or negligent act which creates the likelihood of injury to an endangered species by annoying the species to such an extent as to significantly disrupt its normal behavioral patterns.” The Court then reviewed the facts of case to determine whether Defendants’ actions could constitute harassment under the state statute.” http://liebermanblecher.com/2012/03/17/endangered-species-new-jersey-development/</i></p> <p>Response: As mentioned in the response to comment 100-67 the statement about harassment was an attempt to identify that wildlife harassment by snowmobile is already illegal in the state of Montana and to show the scale of wildlife being illegally pursued/harassed by people on OSVs. The number of tickets issued was not utilized to evaluate effects to wildlife. Indicators and measures for each species are tied to specific areas (winter range and denning) where the greatest potential for effects exist. One of the indicators similar to all species analyzed in the DSEIS is the potential for disturbance, which is very similar to what the reviewer is recommending we analyze. Please see the DSEIS pages 33, 34, and 69 for the indicators and measures analyzed by species forest-wide and by landscape. Please see response to comment 100-67</p>

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	regarding the Endangered Species Act definition of harass. Your citation is to New Jersey court decision concerning the definition of “harass” under New Jersey law.
151-4	<p><i>I have a concern that the Forest failed to consider potential incidents of harassment from their own corporate LEIMARS database and the observations of their own Law Enforcement Officers, There are many CFR violations that although do not specifically articulate harassment, should be considered as possible incidents of harassment. A simple incident of driving cross country, on a closed road or trail during the winter months very well could be wildlife harassment as defined by federal statute.</i></p> <p>Response: This analysis is specific to OSV travel and the indicators and measures as mentioned above were analyzed based on effects from OSV use.</p>
151-5	<p><i>The Forest Plan designated some areas of the National Forest as summer non-motorized. Within this designation the Forest Plan identified each road and trail that was within the area that would ultimately be closed due to the Summer non-motorized designation. Although there may be some argument that site specific analysis was or was not done on these individual routes, at the very least the individual routes were identified. This was not the case when looking at the winter non-motorized allocation of the Forest Plan. The winter non-motorized allocation has brought about site specific travel management decisions to the ground that have not been through site specific analysis. I will use a specific road to articulate the point I am trying to make. The Brownback road FDR# 5104 is in the North part of the Tobacco Root Mountains along the South Boulder River on the Jefferson District. For many years, this road has been managed as a hunting season closure, being closed to motorized travel from October 15 through December 1 annually. After implementation of the forest winter non-motorized designation, this road is closed from October 15 through May 15 annually. The Forest Plan did broad area analysis, it did not identify specific analysis on the road. As an aside, review of the special order that legally governs the Brownback road will reveal that the road should be closed yearlong. Please see attached special order.</i></p> <p>Response: This SEIS does not provide supplemental analysis to the 2009 FEIS for summer motorized and non-motorized allocations. Please refer to the purpose for the analysis (DSEIS, pg. 6). Winter motorized and non-motorized allocations do not alter management of wheeled motorized vehicles. We assume this reviewer is referencing Road 5104 in the Tobacco Root Mountains. This route has seasonal restrictions for wheeled motorized vehicles. The area is closed to OSV December 2-May 15. Agency law enforcement officials are aware of inconsistencies with special orders for wheeled motorized vehicles and are working with line officers to resolve enforcement issues.</p>
151-6	<p><i>Conflicts between motorized and non-motorized uses.</i></p> <p><i>Another area of potential conflict has been the Chief Joseph Pass (within the Big</i></p>

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	<p><i>Hole Landscape). The cross-country ski trailhead and parking area is located at Chief Joseph Pass and a snowmobile parking lot is located off of Highway 93 near Forest Service Road 1260. There has been a long-standing verbal agreement between the Bitterroot Cross-Country Ski Club and Bitterroot Ridge Runners to keep motorized use off groomed cross-country ski trails. Chief Joseph is an example where cooperation has resulted in precluding use conflict. The preceding paragraph and described verbal agreement is troublesome as the Forest is depending on a verbal agreement to manage use. Short of an analysis and Special Order, what is being depicted or desired on the ground is pointless, and very well may be misleading to some.</i></p> <p>Response: Please see response to paragraphs 99-55, 100-88 and 199-3.</p>
151-7	<p><i>Effects Common to All Alternatives in All Landscapes</i></p> <p><i>There is very little use by any other motorized vehicles during the winter season in areas proposed for snowmobile use. Snowmobiles are the primary motor vehicles in use during winter. The only potential conflict among different classes of motor vehicle use in winter is early spring ATV use on roads designated for wheeled motor vehicle use yearlong and tracked OHVs. Tracked OHVs is an off road/Off highway recreation vehicle (ATV or UTV) which has been converted to a tracked vehicle by replacing its wheels with either multiple tracks or a rear track/front ski combination. Full sized vehicles also occasionally use open routes when snow levels are low. Legal ATV and full size vehicle use can rut the snow enough to make snowmobile use difficult. However, this conflict is result of route designation for wheeled vehicles, not area OSV designation considered here. Tracked OHV use is growing in the Jefferson and Upper Clark Fork Landscapes, especially in low snow areas.</i></p> <p><i>Assessments have been completed regarding conflicts between snowmobiles and tracked OHVs (Trails Working Coalition, 2014; Trails Working Coalition, 2015). The 2014 assessment compared impacts from operation of snowmobiles and tracked OHVs on groomed routes and documented depth impressions from each vehicle type during aggressive starts, aggressive stops, and high speed pass by on both straight and winding route segments. The field evaluations showed little difference between snowmobile and tracked OHV impacts. The 2015 field assessment focused on observing potential impacts from riding on groomed snowmobile routes and off-route operation of tracked OHVs in open cross-country areas. Key findings were that none of the tracked OHVs observed operating on groomed snowmobile routes created rutting of the trail or any other adverse effects to the groomed trail surface. Track impressions left in the uncompacted new snowfall by tracked OHVs, were no different than what would have been left by a snowmobile during through the same new snow. Conflicts between classes of motor vehicle uses have not been observed. There are no other classes of motor vehicle uses that would potentially conflict with snowmobile use. There are no projected conflicts between different classes of</i></p>

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	<p><i>motor vehicles in winter in any landscape or any alternative.</i> http://www.snowmobileinfo.org/snowmobile-access-docs/Assessment-of-Tracked-OHV-Use-on-Groomed-Snowmobile_Trails.pdf http://www.snowmobileinfo.org/snowmobile-access-docs/Supplemental-assessment-of-tracked-ohv-use-on-groomed-snowmobile-trails.pdf</p> <p>Response: The information you have provided is noted and has been referenced in the SEIS.</p>
151-9	<p><i>This SEIS is very confusing as it jumps around from a snowmobile issue and then back to an OSV issue. The 2005 Travel Management Rule defines OSV as: 36 CFR 212.1. What is the Forest attempting to manage? Snowmobiles or Over Snow Vehicles. On the BDNF, snowmobiles may be the primary motor vehicle in use during winter, however technology is changing, tracks for four-wheelers, UTVs, and even motorcycles has enlarged the areas accessible to motorized over snow vehicles. Tracked four-wheelers are able to traverse deep snow in the high country, as well as areas that have little to no snow. Without an adequate cover of snow damage to soil and vegetation will occur by any tracked vehicle that is allowed to travel cross country. Tracked motorcycles are able to travel in places that no other over snow vehicles can go, they can side hill very easy, and maneuver through very tight locations. Many of the areas designated as open to snowmobile use from the Forest Plan do not receive snow with an adequate depth to protect soils and vegetation from tracked over snow vehicles. Pipestone is a transitional area of the forest where winter and spring may come many times throughout the winter season. The pipestone area is not restricted to snowmobiles, yet rarely gets enough snow for a traditional snowmobile to travel on the trails or cross country. Are other forms of Over Snow Vehicles allowed to travel cross country just because they have tracks? The answer to this question has not been made clear on the BDNF.</i></p> <p>Response: Please see response to comment 99-56.</p>
152-1	<p><i>We have recreated in the Delmoe Lake and Whitetail Recreation area for years. We have watched this whole area being destroyed by 4-wheel and bike (motorcycle) travel. New trails made everywhere, the old trails that were made in early mining days, with no regard to the grade, straight up and down hills, now they are looking like Grand Canyon with all the travel. We feel all of the old mining trails should be realigned and closed to all motor vehicle travel. This country is all granite and erodes terrible with travel. We cannot understand how the Forest Service can allow all this 4-wheel and motorbike traffic that is destroying this land. I have enclosed some pictures of the eroded areas. If you would like to see this area I would be glad to take you.</i></p> <p>Response: This comment refers to wheeled, motorized use. The SEIS supplements analysis in the 2009 FEIS for areas open to OSV use. The 2010 ROD restricts wheeled, motorized use to those routes delineated on page 53 of the Forest Plan (including the Delmoe Lake and Whitetail-Pipestone area).</p>

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152-2	<p><i>Much of this land is low snow fall area and is deer and elk wintering ground. The elk are now being pushed onto private land where hunting isn't allowed.</i></p> <p>Response: Thank you for your observations about summer off-highway-vehicle use. This analysis is limited to over-the-snow travel (OSV). Please see the updated section of the FSEIS for the big game analysis in reference to OSV use.</p>
153-1	<p><i>The Court Orders Do Not Mandate Further Restrictions on Existing Access. Nothing about the court-ordered remand addresses the substance of the Forest's decisions about winter use. We anticipate that preservationist interests, almost certainly to include the Wildlands CPR plaintiffs, will suggest that the Circuit Court's decision somehow implies, if not directs, that additional restrictions be placed on winter motorized access. This is not true. It is useful to review exactly what the Ninth Circuit did, and did not, order. The opinion is basically organized according to four issues:</i></p> <ul style="list-style-type: none"> <i>(A) Impact of snowmobile use on big game wildlife;</i> <i>(B) Conflicts between snowmobiles and other recreational uses;</i> <i>(C) Compliance with the minimization requirements; and</i> <i>(D) Ripeness of the challenge to Subpart C of the 2005 Travel Management Rule ("TMR").</i> <p><i>In short, the Forest Service (and Intervenors) prevailed on issues (B) and (D), and the Plaintiffs/Appellants prevailed on issues (A) and (C). In both instances, the Court did not find that illegal impacts were occurring, but only that the agency's procedures did not fully comply with the requirements of NEPA or the TMR. The Ninth Circuit does not direct that further restrictions should be imposed. Indeed, even the Circuit panel acknowledges that roughly 40% of the Forest is off limits to snowmobiles, and that this was a reduction of areas open to snowmobiles in relation to prior plans. The Circuit panel notes language in the ROD expressing concerns about impacts, attributed to "unmanaged expansion of motorized use," and further describes in general terms a variety of theoretical impacts to wildlife, in the absence of any citation to the record or any other supporting documentation. Wild/ands CPR, 790 F.3d at 923. Whatever concerns or good intentions may have motivated the Court's narrative, the Forest is tasked with addressing these questions through the specialists and scientific methods of its choosing. It is the agency's job, at least on this record, to make the decisions about location and nature of continuing motorized access to the Forest. The courts should not, and here have not, entered into those substantive choices for the Forest.</i></p> <p>Response: Your views are noted.</p>
153-2	<p><i>The DSEIS Fails to Identify a Reasonable Range of Alternatives or Preferred Alternative. The DSEIS appears to be narrowly designed to only address the direction of the remand order "by disclosing potential snowmobile impacts on big game wildlife and applying the minimization criteria in the 2005 Travel Management Rule." DSEIS at 6. The DSEIS does not contain new alternatives</i></p>

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	<p><i>or modifications to the earlier alternatives outlined in the FEIS. Id. at 6... It is unclear if the SEIS is limited to this set of alternatives. Assuming so, the agency does not identify a preferred alternative. See, 40 CFR §1502.14(e). The Forest should clarify the range of decision-making options and provide the public with a meaningful ability to review and comment upon those alternatives.</i></p> <p>Response: The 9th Circuit decision found fault with the FS Forest Plan’s analysis of impacts of OSV on big game and found that the FS had not adequately applied the minimization criteria of 36 CFR 212.55. The remand required a supplemental analysis of the Forest Plan. This Supplemental EIS complies with the court’s remand by identifying potential conflicts and impacts that may occur from OSV use under the Forest Plan alternatives. This analysis provides the information the Forest Supervisor needs to consider, and apply, with the objective of minimizing adverse effects from this use under the Plan.</p>
153-3	<p><i>The DSEIS Appropriately Addresses the Minimization Criteria. If the Forest did not properly address the minimization criteria before, the DSEIS sets a foundation that almost certainly assures it will do so here. In defense of the earlier decision, it is appropriate to note that the Ninth Circuit guidance and cited district court decisions had not been articulated or did not exist in 2009 when the Forest Plan was adopted. Regardless, the DSEIS makes abundantly clear the agency's approach to describing selection of routes/areas "with the objective of minimizing environmental damage" as applied to each of the enumerated minimization criteria. Wild/ands CPR, 790 F.3d at 932. We anticipate that some commenters will cry foul and ask for "more minimization" but the Forest has amply complied with the directive to more specifically address the minimization criteria.</i></p> <p>Response: Your views are noted.</p>
153-4	<p><i>The DSEIS Does Not Support Wildlife-Based Restrictions on Winter Use. The Ninth Circuit did direct the agency to perform additional analysis of impacts to "big game wildlife" and we anticipate that many commenters will seize this moment to seek further restrictions advancing some wildlife-based rationale(s). The agency should decline any such invitation. The DSEIS analysis and discussion does not reflect any need to impose restrictions on winter uses due to impacts on big game wildlife. To the contrary, the DSEIS contains substantial analysis which rebuts any alleged need for further restrictions. Elk are "at or above population objectives and the elk population across the Forest has grown from 28,220 in 2007 to 48,863 in 2015. DSEIS at 97. The agency acknowledges "that forestwide, winter motorized travel is not affecting elk populations." Id. Relatedly, snowmobile travel "has not been identified as an issue for mule deer or moose populations across the Forest. Id. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and "there are no known cases of conflict with</i></p>

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	<p><i>mountain goats as a result of winter recreational activities on the BDNF." Id. Finally, the analysis concludes there is only one area of even potential concern for bighorn sheep, and notes "MFWP has not identified snowmobile use in this area as a management challenge for this or any other herd on the BDNF." Id.</i></p> <p>Response: Thank you for your comment. Your comments supporting the adequacy of the SEIS analysis for big game and opinion that further OSV restrictions are not warranted has been noted. This comment provides a number of selected quotes from the big game section of the draft SEIS. In all wildlife sections, it was acknowledged that there could be effects to individuals from OSV travel. The Forest Service’s big game analysis has been updated in the Supplemental Final EIS with additional information from MFWP. Also please see our response to comment 99-10.</p>
153-5	<p><i>They are not technically big game wildlife, but neither are there any justifiable reasons to restrict winter recreation based on concerns about grizzly bear, lynx or wolverine. BDNF grizzlies occur outside prioritized recovery zones, yet within the region "have expanded ...despite human presence and activity, including existing winter motorized travel." DSEIS at 127. The analysis for lynx concludes "[w]e are unable to identify any discernible effects to lynx on any of the landscapes" says the USFS. DSEIS at 129. For wolverine, specialists "continue to say that the best scientific information available does not substantiate recreational activities as a threat to wolverines." DSEIS at 151.</i></p> <p>Response: Please see response to comment 153-4. In addition, in reference to grizzly bears, lynx and wolverines, it was acknowledged in the effects for sections of the DSEIS (starting on page 97 and page 127) that there could be effects to individuals. The Forest consulted with USFWS on grizzly bear and Canada lynx for activities in the Forest Plan, including OSV travel and biological opinions were received. Please see response to Comments in 99-10, among many other responses dealing with OSV impacts on grizzly bear, lynx and wolverine.</p>
153-6	<p><i>The DSEIS Does Not Support Restrictions for Alleged Use Conflicts. Similar to the wildlife analysis, there is no defensible basis to further restrict snowmobile access due to alleged "user conflict." The Forest acknowledges that "[c]onflicts among uses are not about physical confrontations between users in the field; it is more about personal values and perceptions of motorized versus non-motorized uses." DSEIS at 155. It is important to note that the Forest Service won on the "user conflict" issue before the Ninth Circuit. Wildlands CPR, 790 F.3d at 929 ("the Forest Service provided sufficient information to establish that it took a "hard look" at the impacts of snowmobile use on non-motorized recreation in these particular management areas and throughout the Revised Plan area.").</i></p>

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	<p>Response: Thank you for your comment. Your comments supporting the adequacy of the 2009 FEIS in terms of use conflict that further OSV restrictions are not warranted has been noted.</p>
153-7	<p><i>We are particularly concerned about, and committed to future meaningful access to, the Mount Jefferson area. Again, this area was emphasized by the Plaintiffs/Appellants and specifically resolved in the Appellees' favor by the Ninth Circuit. Id. We recognize that the 2009 ROD provides for monitoring and an option to revisit allocations at Mount Jefferson, but the DSEIS contains no information about unique concerns at Mount Jefferson or a trend toward some unacceptable threshold of "illegal" use. Rather, use "has been monitored every year since 2001, documenting motorized intrusions into the closed area each successive year." DSEIS at 156. If the agency and/or preservation interests contend that Mount Jefferson should be closed based on non-compliance, the DSEIS does not rationally document a basis for that change. The prior decision, which was upheld by the courts, should remain in place.</i></p> <p>Response: Your views are noted. Please see response to comments 25-1 and 99-18 and the SEIS concerning efforts being undertaken in reducing non-compliance of the closure boundary.</p>
153-8	<p><i>The Agency Should Include Modifications to Prior Alternatives in this Analysis. Unfortunately, the DSEIS does not reflect any effort or willingness to revisit or refine site- specific issues or logical improvements that have become apparent since adoption of the 2009 Plan. In particular, we are concerned that there is little or no attention paid to a modified decision affecting FR 1260, which we have attempted to raise with the Forest. We have raised this issue in prior correspondence with the Forest, in which you indicated that a ruling from the Ninth Circuit in Wildlands CPR "could have a bearing on any proposal and subsequent analysis to modify a non- motorized designation to allow snowmobile use." Letter from Melany Glossa (dated September 16, 2014) (attached as Exhibit A). You further indicated in that letter that you would be "willing to consider amending the 2009 Forest Plan to allow snowmobile use on Forest Road 1260 in fiscal year 2017." Id. The agency should take advantage of the current analysis on remand to address this option, and similar pragmatic refinements. Based on recent District Court filings, a decision on the DSEIS will occur in fiscal year 2017. The DSEIS acknowledges this issue, and states that "[t]here has been a long-standing verbal agreement between the Bitterroot Cross-Country Ski Club and the Bitterroot Ridge Runners to keep motorized use off the groomed cross-country ski trails" and holds this out as "an example where cooperation has resulted in precluding use conflict." DSEIS at 156-157. We appreciate your recognition of this situation, but would appreciate a far greater show of support and willingness to partner in an obvious management solution from</i></p>

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	<p><i>the Forest Service. There are no reasons to stubbornly adhere to the existing non-motorized boundary and overlook the obvious practical and safety benefits of allowing resumption of snowmobile use along FR 1260. This issue has been sufficiently vetted, including within the DSEIS, to allow such a modification.</i></p> <p>Response: Please see responses to comments 8-2 and 99-55.</p>
154-1	<p><i>I recognize the value of multiple use plans for our national forests. I also recognize the need to carefully protect areas of the forest and associated aquifers and headwaters. Please protect Mt. Jefferson and the essential headwaters of the Missouri River. Keep motors out of upper Hellroaring Creek drainage to the Continental Divide.</i></p> <p>Response: Your views are noted.</p>
154-2	<p><i>Also, it would be good to eliminate snowmobiling in Sullivan Creek and around Barber Lake by Anaconda-Pintler. A general decrease in the amount of open range open to snowmobiles protects wildlife and maintains some quiet spaces.</i></p> <p>Response: Your views are noted. Please see the response to comment 99-10. Additionally, neither of these areas were identified by MFWP as issues for wintering wildlife.</p>
175-1	<p><i>As you look to the future, I encourage you to once and for all protect Mount Jefferson and the ultimate headwaters of the Missouri River by keeping the upper Hellroaring Creek drainage to the Continental Divide motor-free. Mount Jefferson is an amazing place that deserves to be protected now and into the future.</i></p> <p>Response: Your views are noted.</p>
176-1	<p><i>We urge you to protect winter wildlife habitat and quiet backcountry recreation. The BDNF is important to wilderness wildlife. It has special importance as the link between Glacier National Park, central Idaho’s wilderness lands, and Yellowstone. Winter is a critical time for many wildlife species and their needs should have priority in the planning process. As you review your winter travel management regulations, I encourage the agency to improve protection of important winter wildlife and backcountry solitude.</i></p> <p>Response: Thank you for your recommendation. Please see the response to comment 99-10.</p>
178-1	<p><i>I am in support of Alternative 4, which keeps Mount Jefferson open to snowmobile use.</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
178-2	<p><i>Snowmobiles have no effect on big game and wildlife:</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on wildlife on the BDNF are noted. Additionally please see the response to Comments 153-4 and 153-5.</p>
178-3	<p><i>They (snowmobiles) do not harm soil, vegetation, watershed, etc.</i></p>

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	Response: Your personal observations regarding the effects of OSV use on soils, vegetation and watersheds are noted.
178-4	<i>The closure of any additional snowmobile use in the Beaverhead Deer Lodge forest will adversely effect the economies of many small communities.</i> Response: Your concern for local economies is noted. Please refer to the 2009 FEIS for analysis of potential impact to economics.
178-5	<i>Contrary to what environmental organizations advocate, we who enjoy snowmobiling and 4-wheeling are for the most part very good stewards of the land and have an immense respect and love of our wildlife.</i> Response: Your personal observations regarding ethical use of the National Forest System by motorized recreationists is noted.
178-6	<i>Many individuals such as myself are senior citizens and depend on our weekly excursions onto public lands to maintain our health and well-being.</i> Response: Your enjoyment of the National Forest System and associated health benefits is noted.
179-1	<i>It is time to take ACTION to put a stop to the “illegal discrimination” against a large Population of Montana Citizens that need reasonable accommodations to enjoy the Treasures of the “Treasure State”.</i> Response: Your views are noted.
179-2	<i>Future Generations grow older or may become disables, such as some of Out “Wounded Warriors” and can no longer hike miles, ride a Horse, or walk at all ! Are they going to be “Side-Lined “In existing / future “Forest Plans”? Would you like to be Excluded from Montana’s Natural Wonders ?</i> Response: Your views are noted.
179-3	Franklin Roosevelt put it this way; “I see an America whose rivers and valleys and lakes-hills and streams and plains-the mountains over our land and nature’s wealth deep under the earth-are protected as the rightful heritage of “All the People.” Response: Thank you for your appreciation and historical perspective on this nation’s natural wealth.
179-4	<i>Here’s The Law: USDA Non-Discrimination Policy Statement: DR 4300 USDA Equal Opportunity Public Policy (June 2, 2015)... USDA programs are –prohibited—from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, Disability, Age, marital status, family/parental status, In any program or activity conducted or funded by the USDA. Hopefully, the above words along with the Law will be considered in the Re-Visit to the Beaverhead-Deerlodge Forest plan.</i> Response: Please see response to comment 39-3.
180-1	<i>I am writing in regards to Sally Cathey’s guest view in the Montana Standard titled, “Forest Service Needs to Amend Beaverhead-Deerlodge Forest Plan.” I DISAGREE with her viewpoint. This is a ridiculous request on her part and it</i>

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	<p><i>seems that she is trying to use her position as leverage to get her way.</i> Response: Your support of the 2009 Forest Plan is noted.</p>
180-2	<p><i>I am an avid snowmobiler that spends plenty of time in the Beaverhead-Deerlodge National Forest. I grew up in the area and love it as much as the next person does. I believe that ALL outdoor enthusiasts should have EQUAL access to the area as long as they take care of the land.</i> Response: Your support of motorized and non-motorized recreation opportunities on the BDNF is noted.</p>
180-3	<p><i>I am confused as to how cross country skiers are bothered by snowmobiles, other than being completely ridiculous and over-sensitive to a little bit of noise for a moment. As a snowmobiler, I don't ride right along-side a cross country skier when I see them. A snowmobile travels at a much faster speed than a skier and is gone within a matter of moments. This is a selfish request on her part basically saying she cannot tolerate the noise of a snowmobile for a few moments. A snowmobile is then out of sight and out of hearing distance once the skier, hiker, etc. is passed in a safe manner. As far as I am concerned this is just another outlandish, left-wing request by Ms. Cathey.</i> Response: The SEIS discloses potential noise impacts from OSV use (DSEIS, pg. 166-167).</p>
180-4	<p><i>Open public lands should be open to ALL that love the outdoors and EQUALLY and FAIRLY shared. I believe in respecting each other when we see each other and caring for our land. Maybe snowmobilers are irritated with cross-country skiers. You don't see us requesting to close the land off to the skiers. I don't believe the land should be closed off to cross-country skiers. I am happy to share because we both share a love of the outdoors. Snowmobiling is part of Montana as is skiing. Can't we all just share the land and be happy?</i> Response: Your support of shared uses is noted.</p>
181-1	<p><i>The Draft Supplemental environmental Impact Statement for the BDNF and winter motorized recreation does not require further restrictions on winter motorized access in the BDNF. The court order only requires further analysis.</i> Response: The purpose of the SEIS is to comply with the Court Order (DSEIS, pg. 6).</p>
181-2	<p><i>There is no justifiable reason to restrict winter recreation based on big game winter range, nor are there any justifiable reasons to restrict access due to concerns about lynx or wolverine habitat.</i> Response: Please see responses to comments 153-4 and 153-5.</p>
181-3	<p><i>The Mount Jefferson area is vital to the economy of the Island park area. Island Park is a major snowmobile destination for recreationists in the west. It contains one of the largest grooming programs in the state of Idaho and is enjoyed by users from throughout the country. The continued economic viability of Island Park and similar small towns throughout the west rely on winter usage by the</i></p>

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	<p><i>motorized community.</i></p> <p>Response: Please refer to the 2009 FEIS concerning economic contribution of OSV use in the Mt. Jefferson area to the Island Park, Idaho.</p>
181-4	<p><i>The arguments to restrict winter motorized are largely based on ideology and emotion and have little, if any, scientific fact to support this effort. The prior decision, which was upheld by the courts, should remain in place.</i></p> <p>Response: Please refer to the response to comment 134-3.</p>
182-1	<p><i>Our family has been using livestock as a tool to cause the disturbance necessary to enhance the range resources in the Beaverhead-Deerlodge National Forest since the 1870's. We have also contributed to the economic sustainability and rural character of this area. It is with great concern that the working landscape within USFS lands are being limited and turned into a playground for the healthy wealthy who pay nothing for their activities on federal land while the county taxpayers shoulder the services they demand.</i></p> <p>Response: Please refer to the purpose of this analysis (DSEIS, pg. 6). The 2009 FEIS analyzed economic sustainability, including the influences of county government.</p>
182-2	<p><i>With the use of the ESA, NEPA and the defacto Wilderness Study Areas access to many areas has been limited to the point that it is becoming discriminatory to the general public and their desired uses. This is not how federal lands were intended to be used. In many places these areas are more wild than they have been for centuries. There is hardly anyone up there.</i></p> <p>Response: Your views and observations are noted.</p>
182-3	<p><i>As age creeps up on most of us, it is important to maintain, and in places reopen access that has been closed via extremist litigation resulting in the irresponsible management of our forested and mountainous landscape. Opening up more access than currently exists through collaborative agreements would certainly meet the needs and desires of many more people than current management does.</i></p> <p>Response: Access is different than recreation opportunities. Access is the ability to get to public land and is provided by a network of roads across private property to the BDNF. The SEIS addresses motorized recreation opportunities on the BDNF during the winter.</p>
182-4	<p><i>I am opposed to limiting more access and in favor of amending the plan to increase the opportunity for total public to reasonably recreate on our forested lands managed by the USFS. Let us not just cater to the privileged few. There are many places in the Beaverhead-Deerlodge National Forest they can go where they will see or hear no one. They do not need it all.</i></p> <p>Response: The SEIS analyzes 6 alternatives that consider varying amounts of area open to OSV use on the BDNF.</p>
183-1	<p><i>Please do not listen to people like Sally. She is unfairly targeting snowmobiles</i></p>

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	<p><i>with no real reason. How does a snowmobile do any lasting damage at 9000 feet on 10 feet of snow? Get real.</i></p> <p>Response: Impacts from OSV use on the BDNF is disclosed in the SEIS.</p>
183-2	<p><i>Most snowmobilers are educated, law abiding, tax payers. I know because I am one and I know many who ride. Please maintain our lands for everyone to use and do not take away any land for riding.</i></p> <p>Response: Your support of continued OSV use on the BDNF is noted. Thank you for your continued willingness to recreate on the BDNF in a responsible manner.</p>
183-3	<p><i>It's very possible for cross country skiers and snowmobilers to co-exist and equally enjoy the land.</i></p> <p>Response: Your support of motorized and non-motorized recreation opportunities is noted.</p>
184-1	<p><i>Please, please, please do not close Mt Jefferson to snowmobiles. There are so many people and businesses that depend on revenue it generates from all over the world.</i></p> <p>Response: Your support of continued OSV use in the Mt Jefferson area is noted.</p>
185-1	<p><i>I disapprove of any more wilderness and add any more non motorized to the Beaverhead-Deer lodge national because I am and avid snowmobiler & off road rider.</i></p> <p>Response: The SEIS does not consider additional recommended wilderness on the BDNF. Your support of Alternative 6 Modified is noted.</p>
186-1	<p><i>Island Park, ID is a popular destination for my riding group. The areas around Sawtelle Peak and Mt. Jefferson are our favorite areas to ride. We have many memories there, and it is critical the area stay open for riding. We live in Minnesota and are members of MnUSA.</i></p> <p>Response: Your support of continued OSV use in the Mt. Jefferson area is noted.</p>
186-2	<p><i>There are no justifiable reasons to restrict winter recreation based on big game winter range issues. Elk are “at or above population objectives” and the elk population across the Forest has GROWN from 28,220 in 2007 to 48,863 in 2015. DSEIS at 97. The USFS acknowledges “that forest wide, winter motorized travel is not affecting elk populations.”</i></p> <p>Response: Please see the response to Comments 153-4.</p>
186-3	<p><i>OSV travel “has not been identified as an issue for mule deer or moose populations across the Forest. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and “there are no known cases of conflict with mountain goats as a result of winter recreational activities on the BDNF.”</i></p> <p>Response: Please see the response to Comments 153-4.</p>

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186-4	<p><i>The District of Montana and Ninth Circuit courts both UPHELD the earlier 2009 plan for Mount Jefferson. The court orders do not compel closure of Mount Jefferson. In truth, it would contradict the orders to rely on them as a basis for restricting long-continuing snowmobile riding at Mount Jefferson.</i></p> <p>Response: Please refer to the response to comment 134-3.</p>
187-1	<p><i>I am not much of a letter writer but this hits too close to home as I live in West Yellowstone, Mt. I have been winter recreating around West and surrounding area since I moved here in 1984. As a matter of fact winter recreation is why I moved here. More specifically snowmobiling. It has been a sad state of affairs to continually see "OUR" national forests ever so slowly being taken away from "We the People". The motorized OSV is just the next group to try to remove. In my 30 plus years of riding sled here I have yet to have an encounter with a non-motorized group in the back country.</i></p> <p>Response: Your support of continued OSV use on the BDNF and other National Forest is noted.</p>
187-2	<p><i>Mt Jefferson is a special place to ride and would be a shame to see it closed to winter OSV travel. We have been pinched year after year for riding areas and it needs to come to a halt. Soon! I hike and dirt bike in the summers and see no affects of over snow travel. Please do not close or restrict OSV travel especially in the Mt. Jefferson area. It brings many out of state riders to our little town and helps keep us alive.</i></p> <p>Response: Your support of continued OSV use on the BDNF and personal observation of the impacts of OSV travel is noted.</p>
188-1	<p><i>Restricting snowmobile access to Barker Lake, Sullivan Creek, the Flints and some of the other named areas is a total contrast to the Forest Service's Multiple Use Policy and a total disregard of the interests of those who enjoy riding the back country, rather than riding groomed trails.</i></p> <p>Response: Your support of continued OSV use on and off groomed trails is noted.</p>
188-2	<p><i>There is no viable evidence that any damage has been done to The environment or to any wildlife. The proposed areas for closure are used without a trace of snowmobile access. Where as, summer usage leaves traces of fire pits, cans, paper, not only along the trails but also at mountain lakes.</i></p> <p>Response: Your personal observations regarding the effects of OSV use on wildlife on the BDNF are .noted. Additionally please see the response to Comments 153-4 and 153-5. This analysis does not consider the effects of summer recreation use.</p>
188-3	<p><i>With the recent implantation of the eighteen dollar usage fee for riding snowmobiles on groomed trails and ATVs on trails designated for ATV travel is another restriction on motorized travel in OUR national forest.</i></p> <p>Response: You views are noted.</p>

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188-4	<p><i>Please consider what problems may arise if law abiding riders refuse to comply with all the new restrictions being placed on those who love and enjoy using OUR national forest. I would hope that the Forest Service would not let a few granolas (Webster's Dictionary) dictate how the Forest Service's Multiple Use Policy should be managed.</i></p> <p>Response: Your opinion concerning the multiple use of National Forests is noted.</p>
189-1	<p><i>Many days ago when public lands were setup they were set up for all public. Our family is involved in snowmobiling in the area, members of the Fugowee Snowmobile Club, and land owners in the area. Please keep Mount Jefferson open to all! Stop locking up public lands for special interests with big money and particular agendas.</i></p> <p>Response: Your support of continued OSV use in the Mt. Jefferson area is noted.</p>
189-2	<p><i>The district of Montana and ninth circuit court both upheld the 2009 plan for mount jefferson. There are no justifiable reason to restrict winter recreation on Mount Jefferson based on big game winter range issues, or concerns about lynx or wolverines.</i></p> <p>Response: A summary of the District of Montana opinions and orders and the Ninth Circuit Opinion is provided in the SEIS (DSEIS pg. 4-5). Please see the response to Comments 153-4 and 153-5.</p>
189-3	<p><i>Please keep mount jefferson open and help the depressed economy of Island park to improve for the better.</i></p> <p>Response: Your support of continued OSV use in the Mt. Jefferson area is noted.</p>
190-1	<p><i>We are taking time today to officially weigh in on the FS draft EIS. We are concerned with the Forest Service's inability to enforce the non-motorized area of Mt. Jefferson and, as a consequence, to allow non-compliant snowmobilers to negatively impact the now highly threatened wolverine habitat and denning needs, the spring grizzly habitat, as well as the natural quiet environment for backcountry skiers and snowshoers and BLM's Wilderness Study Area.</i></p> <p>Response: Please see the SEIS and response to comments 25-1, 99-18 and 99-54 concerning OSV incursions into the Forest Service recommended wilderness area and the BLM wilderness study area in terms of use conflict and actions being taken to reduce non-compliance. In response to effects to wildlife, grizzly bears and wolverines please see response to comments 99-10, 99-31 and 148-19.</p>
190-2	<p><i>The Forest Service made it clear in 2009 that if violations of the non-motorized area became an issue, its decision would have to be revisited. There have been documented violations every year since 2001. Now it is time for the FS to reassess its responsibility. The impact of motorized vehicles on Mt. Jefferson is</i></p>

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	<p><i>unacceptable.</i></p> <p>Response: Please see the SEIS and responses to comments 25-1, 99-18 and 99-54 concerning OSV incursions into the Forest Service recommended wilderness area and the BLM wilderness study area in terms of use conflict and actions being taken to reduce non-compliance.</p>
190-3	<p><i>We join the many citizens who are recreationists concerned about our diminishing wildlife habitat and undisturbed natural surroundings for quiet backcountry enjoyment. We urge the Forest Service to follow through on its legal obligation to minimize over-snow vehicle impacts on all the other uses of the forest and prohibit snowmobiling on Mt. Jefferson.</i></p> <p>Response: Thank you for your recommendation. Additionally please see responses to comments 99-10 and 190-2.</p>
191-1	<p><i>Per the complaint from WildEarth Guardians, Friends of the Bitterroot and Montanans for Quiet Recreation, I disagree with their allegations that the Forest Service failed to adequately analyze the impacts to wildlife with winter over-the-snow-vehicle use.</i></p> <p>Response: A summary of the complaint, District Court Opinion and Orders and 9th Circuit Opinion is provided in the SEIS (DSEIS, pg 2-5).</p>
191-2	<p><i>The Haley Family cabin at 8200 ft. elevation is on a patented copper mining claim on Senate Mountain in the Pintlars southwest of Philipsburg. It is a primitive cabin built in July and August twenty years ago. And it is a beautiful cabin with a stunning view of Warren Peak. In the winter the snow looks like diamonds and the icicles like crystal, the cabin, like an igloo and all the trees like marshmallows. I wish you could read the lovely entries in our cabin journals throughout these twenty years. Words of thanks for its availability to all visitors in all seasons. I'd be happy to share those with you. However, we can drive to our cabin only from July 4th until the first snow in October. Disallowing snowmobiles will sadly limit access to our property and greatly devalue our investment.</i></p> <p>Response: Your support of continued OSV use to Senate Mountain is noted.</p>
191-3	<p><i>We support Alternative 4 in your response to the US District Court for the District of MT on the 2005 Travel Management Rule-Supplemental EIS.</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
192-1	<p><i>I read an article in the Montana Standard from Sally Cathey about some changes proposed to the Beaverhead - Deerlodge National Forest. First off I would disagree with the statement that more people cross-country ski these areas than snowmobile. I live in Anaconda and snowmobile the Pioneers, Flints and Big Hole areas, far more people snowmobile these areas than ski.</i></p> <p>Response: The amount of cross country and snowmobile use on the BDNF as presented in the Montana Standard editorial are based on National Visitor Use Monitoring. A description of how to interpret this information has been added</p>

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	to the SEIS.
192-2	<p><i>Also, snowmobilers are not running on big game winter ranges as most of these areas are already closed to snowmobiling or lack the snow to snowmobile.</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on big game winter range on the BDNF are noted. The updated section of the FSEIS displays the amount of big game winter range open and closed to OSV travel. Additionally please see the response to comment 99-10.</p>
192-3	<p><i>As to the changes proposed below are my comments: Eliminate snowmobiling in Sullivan Creek and around Baker Lake on the shoulder of the Anaconda - Pintler. These areas are not used as winter ranges by big game nor by many if any skiers. We snowmobile and fish Baker Lake a few times every year and have never encountered a skier. Sullivan Creek is not used by skiers (I snowmobiled there yesterday) as it is miles from the nearest access. The Pintler wilderness doesn't need additional area added to it and provides a huge area for cross county skiers to find their quiet spot.</i></p> <p>Response: Your support of continued OSV use in Sullivan Creek and around Barker Lake is noted.</p>
192-4	<p><i>As to the changes proposed below are my comments: Significantly decrease the amount of winter range open to snowmobile use. That includes the Big Hole and the north end of the Flint Range. I'm okay with closing the big game winter ranges but keep it limited to the actual ground used. As with the West Pioneers the elk use the areas just off the river, keep access to the high country open with roads such as Bryant and Steele Creeks.</i></p> <p>Response: Thank you for your recommendation. Additionally please see response to comment 99-10.</p>
192-5	<p><i>Keep the high basins of the West Pioneers - including Bobcat Lakes, Lost Horn Mountain and Grouse Lakes - quiet for current and future generations of outdoor enthusiasts. The only people using these areas at this time (winter) is snowmobilers. The West Pioneers already has vast areas that cannot be accessed by snowmobiles and has limited use throughout other than the areas off the Wise River road. The biggest threat to this area and its big game population is wolves, not snowmobiles.</i></p> <p>Response: Thank you for your recommendation. Additionally please see response to comment 153-4.</p>
192-6	<p><i>In summary I feel there is already a good balance of areas for everyone. We don't need change just because one group doesn't like how the other uses the forest. Some changes may be needed but make them using sound judgment, not one groups opinions.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
193-1	<i>I see that the Beaverhead-Deerlodge National Forest is being reviewed again for</i>

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	<p><i>is usage analysis. I don't know if I have actually ridden Mt Jefferson but I have ridden in the Beaverhead-Deerlodge National Park several times when we have visited West Yellowstone National Park when it was still open to Snowmobiling. I have enjoyed Two Tops out of West Yellowstone and we have stopped at Carrot Basin on our trips to Yellowstone. These area are excellent riding areas and gives the riders other destinations to ride so that not all of the snowmobile traffic is condensed into a small area.</i></p> <p>Response: Carrot Basin is located on the Gallatin National Forest. The Two Top Trail is located on the Gallatin and Caribou-Targhee National Forests.</p>
193-2	<p><i>I ride about a 1200 miles per year and have found that getting back off of the main trails is where the best riding is. It produces some of the most beautiful scenery in the winter months that the only way to enjoy them is by snowmobiling.</i></p> <p>Response: Your support of continues OSV use on the BDNF is noted.</p>
193-3	<p><i>I have also read that Mt. Jefferson is a beautiful destination in the summer time and that the trail head is only a short distance away. Yet from reports there are few visitors that make the trek to see the views from the peak. This is why I'm concerned about anymore limiting of our National Forest Lands to Motorized travel. We have allowed for Cross Country Skiers to set a side areas so that they don't have to contend with Snowmobiles and yet they like using snowmobile tracks to travel on. In some areas they even use Snowmobiles to groom the trails for the cross country skiers so that they can actually use more of the area that they begged for.</i></p> <p>Response: Areas are provided on the BDNF for non-motorized winter recreation opportunities in the absence of OSVs.</p>
193-4	<p><i>I'm a member to the Coeur d' Alene Snowmobile Club and have been for more that 25 years. I have seen many legislation over the years to limit motorized travel in areas because they bother or harass the people or the animals. Yet far to many times when they get an area shut down to the motorized vehicles they are then using the trails the motorized vehicles pay for maintaining them through organized fees, like registrations, recreational fee, grooming fee, trail head passes, to name a few. I do realize that there has been some good cases where land has been set aside for the special interest groups that have been good and they are being used.</i></p> <p>Response: In Montana, fees for OSV trail grooming and taxes on OSVs are collected and dispersed by the State of Montana. On the BDNF, State collected use fees collected to accommodate motorized recreation opportunities are not being used to maintain trails restricted to winter, non-motorized use.</p>
193-5	<p><i>As for harassing the people and the animals this is an educational issue because people need to realize the trails are on National Forest Land and they are shared with other kinds of users. We need to educate people that it is not all</i></p>

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	<p><i>about them. It is about we the people with different recreational values to enjoy the great land we live in together in harmony!</i></p> <p>Response: Although public education can help greatly, and is recommended in the FSEIS for moose, OSVs can effect wildlife during the winter. Additionally please see responses to comments 153-4 and 153-5.</p>
193-6	<p><i>Therefore I hope you would represent me and my family in keeping our National Forest Lands Open so that the people who really want to enjoy the adventures of the outdoors can do so.</i></p> <p>Response: All alternatives considered in the SEIS consider continued OSV use on the BDNF.</p>
194-1	<p><i>I am a Montana resident that has been here 56 years, all my life. I enjoy the outdoors because it is physical exercise when I hike, dirt bike, hunt, and snowmobile. There is a number of areas that give proper access that I go with good friends. I understand that some of the logging roads away from main roads, do not need to be kept open in the summer, when it is not a access point. I expect all the historic forest service areas that people have enjoyed for years should never be closed.</i></p> <p>Response: The SEIS considers 6 alternatives that continue providing opportunities for OSV use on the BDNF.</p>
194-2	<p><i>Western Montana has enough wonderful congressionally approved wilderness areas already. Only 2% of people actually go to wilderness areas, so there is many areas to go. Before around 2000, the outside temperatures were close to normal, then the wilderness groups started putting up lawsuits that stopped many proper logging operations and we had a number of major forest fires. The United States Department of Agriculture shows that forest fires are creating global warming and it will be increasing over the years. One acre of a forest fire creates more carbon dioxide than 1200 cars do in a year. Naturally forest fires are not stopped in wilderness areas, so I am against any more wilderness in Western Montana. Montana needs to get back to proper logging operations that helps the US economy.</i></p> <p>Response: This SEIS does not consider additional recommendation for wilderness designation or additional timber harvest.</p>
194-3	<p><i>Over the 35 years that I have snowmobiled and then hiked the same areas in summer, there is no effects that snowmobiles create. Even many of my older friends that snowmobiled years before me, never saw any effects. That is why all the areas should never be closed, just as the regulations show that these areas cannot be closed. I only snowmobile when there is a proper amount of snow to cover logs and rocks for safe riding.</i></p> <p>Response: Your personal observations concerning impacts of OSV use is noted.</p>
194-4	<p><i>The wilderness and winter ranges are the areas that always get proper respect to stay out. I have never seen any animals that stay in the high mountains that</i></p>

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	<p><i>have proper snow. Even the recent grizzly bear information, I have never seen them or their tracks in the springtime, while there was still snow. the wilderness groups always put out untrue information, so don't close any snowmobile areas.</i></p> <p>Response: Thank you for your personal observations. Although big game animals may not winter in the deep snow, there are other wildlife species that do. Please see responses to comments 153-4 and 153-5.</p>
195-1	<p><i>Please keep Mount Jefferson open to snowmobiling use--- do not close any trails/access on the advice of groups that have no sincere interest in Montana and only serve to lock access up to those of us who live here.</i></p> <p>I support Alternative 4.</p> <p>Response: Your support of Alternative 2 is noted.</p>
196-1	<p><i>My name is Ashton Loomis. I am 12 years old, and I am a snowmobiler who loves to ride with family and friends. The Beaverhead-Deerlodge National Forest is a beautiful place to recreate. I am writing to you today to ask you to please use alternative four.</i></p> <p>Response: We are delighted to see a 12-year old participating in a public comment process for managing the BDNF. Your support of Alternative 4 is noted.</p>
196-2	<p><i>I ride the Pioneer Highway from the Pattongale to the Grasshopper Inn usually annually. This is a great ride which helps to stimulate the economy by people spending money in these small towns which are on the verge of becoming mere ghost towns.</i></p> <p>Response: The route described in this comment is the Wise River National Recreation Trail. This trail remains open to OSV use in all alternatives.</p>
196-3	<p><i>My family and I rode in the Pioneer Mountains just recently on February 22. We had a great time and rode in the best snow we'd been in in a long time! Rides like these are few and far between, and closing us out would make these even fewer and farther between.</i></p> <p>Response: All alternative consider continued OSV use in the Pioneer Mountains.</p>
196-4	<p><i>I have never had any negative conflicts with other recreationists. It is not often when we do see any non-motorized users. Any time we come across other users our crossing of paths go very smoothly. This is not an issue at all.</i></p> <p>Response: Your personal observations concerning the lack of recreation use conflict is noted.</p>
196-5	<p><i>We have never seen any big game animals on our winter outings in the Beaverhead-Deerlodge National Forest. We are always too high up where they cannot get food because of snow depths and it is too cold. This is also not a legitimate concern.</i></p> <p>Response: Please see response to comment 153-4.</p>
196-6	<p><i>Snowmobiling brings so much into our economy, and the Beaverhead-Deerlodge</i></p>

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	<p><i>is so big we can't afford to lose these areas. This is one of my favorite areas to ride. Seeing no reason for us to be shut out I ask that you act fast and please use alternative four which is the all-around best alternative to keep us access to these areas.</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
197-1	<p><i>Snowmobiling and OHV recreation are very important to me and my family. We participate in one of these activities at least one day a week, and often times more. Snowmobiling and OHV recreation are great family activities that can be shared and enjoyed with others as well and are a great way to recreate. We also do a lot of non-motorized recreation, and feel that there must be a balance between the two. What I have witnessed recently is that the emphasis is given to non-motorized recreation with the closing of motorized trails and the addition of more wilderness study areas reducing the areas motorized recreationalists can enjoy.</i></p> <p>Response: Your support of both motorized and non-motorized recreation opportunities is noted.</p>
197-2	<p><i>Closing these areas down to motorized recreation will just cause more concentrated use. This will lead to more complaints and more closures. Closing these areas makes no sense. These areas have already been significantly reduced in motorized recreation area in all of the previous travel plans. We have to stop somewhere and realize that motorized users are important too.</i></p> <p>Response: All alternatives consider continued OSV use of the BDNF.</p>
197-3	<p><i>Motorized visitors are the majority of visitors to the forest and users of motorized areas. Why are motorized visitors the only ones to lose and why isn't there any attempt to meet their needs?</i></p> <p>Response: Please refer to the purpose of this SEIS (DSEIS, pg. 6). The purpose is not put motorized visitors in a position where they “lose”. The SEIS discloses OSV impacts on big game wildlife and resources cited in the minimization criteria as ordered by the District Court of Montana.</p>
197-4	<p><i>There are no justifiable reasons to restrict winter recreation based on big game winter range issues. Elk are “at or above population objectives” and the elk population across the Forest has GROWN from 28,220 in 2007 to 48,863 in 2015. DSEIS at 97. The USFS acknowledges “that forest wide, winter motorized travel is not affecting elk populations.” OSV travel “has not been identified as an issue for mule deer or moose populations across the Forest. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and “there are no known cases of conflict with mountain goats as a result of winter recreational activities on the BDNF.”</i></p> <p>Response: Please see response to comment 153-4.</p>
197-5	<p><i>The District of Montana and Ninth Circuit courts both UPHELD the earlier 2009 plan for Mount Jefferson. The court orders do not compel closure of Mount</i></p>

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	<p><i>Jefferson. In truth, it would contradict the orders to rely on them as the basis for restricting long continuing snowmobile riding at Mount Jefferson.</i> Response: Please refer to the response to comment 134-3.</p>
197-6	<p><i>There are no justifiable reasons to restrict winter recreation based on concerns about lynx or wolverine. “We are unable to identify any discernible effects to lynx on any of the landscapes” says the USFS. DSEIS at 129. For wolverine, specialists “continue to say that the best scientific information available does not substantiate recreational activities as a threat to wolverines.” DSEIS at 151.</i> Response: Please see the response to comment 153-5.</p>
197-7	<p><i>This is all about rights. Special interests want to make sure we don’t step on the rights of others, but it is ok to trample on our rights as law abiding citizens who recreate in our national forests with a motor vehicle. These special interest and environmental groups don’t participate in motorized recreation, so why should anyone else? Wouldn’t you love it just as much if all you can do is stand back and look at it? This is the wilderness creed. It is wrong and unfair.</i> Response: Your objection to methods for advocating for restrictions on motorized recreation opportunities is noted.</p>
197-8	<p><i>This area is already covered by a travel plan that has been reviewed. It should not be allowed to change just because someone didn’t get as much wilderness or de-facto wilderness aka road-less areas as they wanted. These folks want to trample the rights of others they do not agree with, while demanding more rights for themselves. There are millions of acres of wilderness and de-facto wilderness out there, and we certainly do not need any more.</i> Response: Please refer to the response to comment to 197-7.</p>
197-9	<p><i>I believe that it is important to maintain a balance between motorized and non-motorized use, and closing more areas to motorized recreation in any form is counterproductive.</i> Response: Your support for balancing motorized and non-motorized recreation opportunities and oppositions to closing more areas to motorized recreation is noted.</p>
198-1	<p><i>The Court Order does not direct closure of any existing riding opportunities. The Court only requires further analysis to be performed.</i> Response: Please refer to the response to comment 134-3.</p>
198-2	<p><i>There are no justifiable reasons to restrict winter recreation based on big game winter range issues. Elk are “at or above population objectives” and the elk population across the Forest has GROWN from 28,220 in 2007 to 48,863 in 2015. DSEIS at 97. The USFS acknowledges “that forest wide, winter motorized travel is not affecting elk populations.” OSV travel “has not been identified as an issue for mule deer or moose populations across the Forest. Mountain goats avoid deeper snow accumulations favored by human winter recreationists, and “there are no known cases of conflict with mountain goats as a result of winter</i></p>

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	<p><i>recreational activities on the BDNF.</i></p> <p>Response: Please see response to comment 153-4.</p>
198-3	<p><i>There are no justifiable reasons to restrict winter recreation based on concerns about lynx or wolverine. “We are unable to identify any discernible effects to lynx on any of the landscapes” says the USFS. DSEIS at 129. For wolverine, specialists “continue to say that the best scientific information available does not substantiate recreational activities as a threat to wolverines.” DSEIS at 151.</i></p> <p>Response: Please see the response to comment 153-5.</p>
198-4	<p><i>The District of Montana and Ninth Circuit courts both UPHELD the earlier 2009 plan for Mount Jefferson. The court orders do not compel closure of Mount Jefferson. In truth, it would contradict the orders to rely on them as a basis for restricting long-continuing snowmobile riding at Mount Jefferson.</i></p> <p>Response: Please refer to the response to comment 134-3.</p>
198-5	<p><i>The DSEIS does not contain data or analysis that would support restrictions or closure of Mount Jefferson to snowmobiling. The USFS acknowledges that “[c]onflicts among uses are not about physical confrontations between users in the field; it is more about personal values and perceptions of motorized versus non-motorized uses.” DSEIS at 155. The DSEIS contains no information about unique concerns at Mount Jefferson or a trend toward some unacceptable threshold of “illegal” use. Rather, use “has been monitored every year since 2001, documenting motorized intrusions into the closed area each successive year.” DSEIS at 156. The prior decision, which was upheld by the courts, should remain in place.</i></p> <p>Response: Please refer to the response to comment 134-3.</p>
199-1	<p><i>I started skiing into Hogan Cabin 22 years ago, but stopped using that cabin many years ago because of conflicts with snowmobiles. Every time we stayed at the cabin snowmobilers would show up and play out in the meadow in front of the cabin; not exactly a quiet recreational experience. The tipping point was early one winter (I think the first weekend the cabin was open), after skiing in along the Trail Creek road, encountering several snowmobilers along the way, we arrived at the cabin only to find out it had been broken into, the cook stove removed, but at least the wood stove was still there. We stayed there that evening despite a large group of snowmobilers hanging out near the cabin most of the night. We did report the incident to the Ranger District, but don't know if they ever found out who was responsible. In any case, we gave up on using Hogan and started using May Creek cabin, since there are currently no snowmobiles allowed in the area.</i></p> <p>Response: This is a specific area in the Big Hole Landscape where Forest Plan allocations minimize conflict between motorized and non-motorized recreation experiences. From the same parking area along the plowed highway, recreationists can proceed north to Hogan Cabin (in an area open to OSV use)</p>

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	or south to the May Creek Cabin (in an area closed to OSV use).
199-2	<p><i>On that note, the current winter use plan is better than the previous plan, since at least it keeps snowmobile use to the north side of highway 43. As it stands now, I believe the May Creek, Cabinet Creek, Anderson Ridge, and Anderson Mountain trails are off limits to OSVs. Since the other side of highway 43 is open to snowmobiles, I'm not sure if the Shoofly XC Ski Trail is officially off limits to OSVs, and the same could be said about the Scooter Creek trail. I haven't encountered OSVs on Shoofly or Scooter, but I have seen many snowmobile tracks in and around the meadows along the Shoofly trail. I've also seen Snow Bike (motorized) trails along Anderson Mountain road, and it could be that they are actually allowed (or at least not officially banned) from using the road, but not areas off the road. It's unclear to me whether the B-D or the Salmon-Challis determine the rules for Anderson Mountain road.</i></p> <p>Response: The May Creek trail is closed to motorized travel; the Cabinet Creek trail has different segments that are open to motorized travel year-long, restricted seasonally, and closed year-long; the Anderson Ridge trail has different segments that are open to snowmobiles year-long and closed from Dec 2 to May 15; Anderson Mountain Road is open to snowmobiles, not groomed, but difficult to access from the BDNF. Anderson road is administered by the Salmon-Challis NF and travel restrictions on the Salmon-Challis NF side area set by that forest. Shoofly has different segments that are open to snowmobiles year-long and closed from Dec 2 to May 15; Scooter Creek is closed to snowmobiles from Dec 2 to May 15. The area 2 restriction (Dec 2 to May 15) north and south of Highway 43 generally has a “buffer” around it that is open to snowmobiles. Please also see the response to comment 199-4.</p>
199-3	<p><i>We also ski the Chief Joseph ski trails. The few times we've been there this winter, we have skied out past Windy Corner to the Gibbons Pass road to check out the roads they now groom for shared snowmobile and skate skier use. There is a big chunk of the Gibbons Pass road that is marked as "No Snowmobile" use, both on the current Chief Joseph ski trails map, and on the ski trail map posted on the tree at the intersection of the Gibbons Pass road and the Windy Passage ski trail. Every time I've been there this winter I see snowmobile tracks on this section of the Gibbons Pass road, and even orange diamonds on the trees; although it is supposedly closed to snowmobiles. So, that being said, there are definitely motorized / non-motorized user conflicts in the Big Hole landscape of the BD and, although it's better than before, there is still more the Forest Service can do to mitigate the conflicts.</i></p> <p>Response: Agency patrolling and following up on public reports confirm that snowmobile incursions onto the cross country ski trails have occurred on the Gibbons Pass road. The Forest Serviced is working to replace old signage, and continues to update maps with correct delineations. Ongoing agreements and</p>

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	<p>cooperation with local clubs has been very helpful in reducing use conflicts in the Gibbon Pass area. Please see DSEIS pg. 156-157 and response to comments 99-55, 100-88, 199-3, and 199-4.</p>
199-4	<p><i>Being a non-motorized user, I definitely like the sound of Alternative 3. I would hope that the non-motorized opportunities in this alternative preserve the existing non-motorized use of all the ski trails connecting to/from Anderson Mountain road and would keep OSVs off the road itself. I would strongly support non-motorized use between Trail Creek and Highway 43. This would ensure no OSVs could use the Shoofly Trail or Scooter Creek trail. It seems unlikely that snowmobiles would use Scooter Creek or even Shoofly, except for the open meadows at the beginning of the trail. But what about motorized snow bikes or the next crazy motorized snow vehicle invented? It's best just to keep all motorized use out of these areas so skiers/snowshoers can enjoy these "Blue Diamond" trails. The section of Gibbons Pass road that is closed to snowmobilers needs to be clearly marked and enforced so the skate skiers can have at least one section of groomed trail without having to encounter motorized travel.</i></p> <p>Response: Thank you expressing your support of Alternative 3. Anderson Mountain road is currently open, but difficult to access from the BDNF. It can be accessed from the Salmon-Challis NF; however, there is a motorized buffer that parallels the road on the BDNF side. Trail Creek is open and used extensively by snowmobilers. Shoofly can be accessed from private land along Highway 43 and the Hogan Cabin area which allows snowmobiles, but both Shoofly and Scooter Creek are located in a non-motorized area. Please also see DSEIS pg. 156-157 and response to comments 99-55, 100-88, 100-91, 199-3, and 199-4.</p>
199-5	<p><i>Although the summary of Alternative 3 in the Draft SEIS claims that "Enforcement (manageability) would be difficult due to routes and even play areas crossing boundaries...", I would argue that the existing rules are just as difficult to enforce and manage; at least in the Big Hole area. Right now it seems that the Forest Service can't effectively sign and enforce the section of Gibbons Pass road that is supposed to be closed to motorized travel. Snowmobiles are allowed to access Hogan Cabin via Trail Creek, but what about Shoofly or Scooter Creek? These are designated ski trails, but they are on the north side of highway 43 which is open to motorized travel. Can Snowmobiles use these trails if they want? Scooter Creek can be accessed from the Gibbons Pass road. Shoofly can be accessed from Hogan Cabin, or highway 43; you can always see snowmobile tracks in the meadows at the beginning of the Shoofly trail. Sometimes it's easier just to limit access to one large area to avoid confusion.</i></p> <p>Response: Please see the response to comment 119-4 above. Please also see DSEIS pg. 156-157 and response to comments 99-55, 100-88, 199-3, and 199-4.</p>

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199-6	<p><i>I strongly support Alternative 3 (summary below) in the Draft SEIS. I believe there is not enough non-motorized winter use on our National Forests. There are very few established winter ski touring trails in western Montana, and those on the B-D are some of the best. Keeping motorized recreation out of these areas provides skiers and snowshoers with the opportunity to experience the quieted and solitude we seek. Keeping the entire area bounded by Chief Joseph Pass ski trails, Gibbons Pass Road, Trail Creek Road, May Creek Trail, and Anderson Mountain Road closed to motorized use would provide a great winter playground for skiers and snowshoers to enjoy. The area is small enough that all trails can be skied out and back in a day, long ski tours completed within a day using a car shuttle, or multi-day trips winter camping or staying at May Creek, Hogan, or Gordon-Reese cabins. If the Trail Creek Road is off limits to motorized travel in the winter, that would also be a benefit to skiers and especially the dog mushers that use it. If Hogan Cabin was off limits to motorized travel, that would be one more cabin that could be enjoyed by non-motorized recreationists, without having to hear and smell two stroke engines. There are very few USFS cabin rentals that are within an easy ski from a road and not accessible by car or OSV. These are premium experiences for us non-motorized users, especially when the cabin is off limits to OSVs.</i></p> <p>Response: Please see the response to comment 119-4 above. Please also see DSEIS pg. 156-157 and response to comments 99-55, 100-88, 199-3, and 199-4.</p>
199-7	<p><i>There are many roads and off-road areas on USFS lands open to motorized winter recreation. Non-motorized winter recreation areas that are accessible, especially for day use, are limited; mostly due to the short distances that can be traveled on skis or snowshoes in a day. Sound and smell travel, making it difficult to escape the presence of motorized vehicles when you are traveling, self-propelled, over snow. Eliminating motorized winter recreation in and around popular XC ski trails, ski touring trails, and easily accessible winter cabin rentals is a great idea which I strongly support. It will go a long way to improve the winter experience of us skiers/snowshoes/dog mushers in the Big Hole area. I encourage you to adopt Alternative 3 of the draft SEIS.</i></p> <p>Response: Your support of Alternative 3 is noted.</p>
200-1	<p><i>I rode on the back side of Mt Jefferson 10 years ago and will never forget the day. The following summer, there was not one bit of evidence that snowmobilers even road the area. So why close access to such a beautiful OSV riding area.</i></p> <p>Response: Your personal observations of OSV impacts and the experience of snowmobiling in Mt Jefferson are noted.</p>
201-1	<p><i>I live in Gooding Idaho. I make several trips a year to island park area for snowmobiling. Usually bringing several friends and family. We do make a week in February our family vacation for the year. Have been doing that for 13 years. We do like the mt Jefferson area. There is no justifiable reason to justify a</i></p>

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	<p><i>closure on big game, Lynx, wolverines or mountain goats.</i> Response: Please see response to Comments 153-4 and 153-5.</p>
201-2	<p><i>It seems to me it's just a battle between non-motorized and motorized Groups. Mainly non-motorized not wanting us there and suing. So I strongly oppose any motorized closures to any part of the DSEIS.</i> Response: The 2009 FEIS considered an alternative to not restrict OSV use on the BDNF (2009 FEIS, pg. 33). The alternative was dismissed from not analyzed in detail due to adversely impacting resources.</p>
202-1	<p><i>I'm an Anaconda resident who is in support of the current winter use plan for the Beaverhead-Deerlodge National Forest.</i> Response: Your support of Alternative 6 Modified is noted.</p>
202-2	<p><i>My support is based on the following: I cross country ski, snowshoe and hike around Anaconda all winter, and can honestly say snowmobiles are not limiting my opportunity to access wild places. In fact, often I'm quite thankful for getting a broke trail into a mountain lake allowing me to get further into "god's country".</i> Response: This description of a preference by some non-motorized users for packed trails produced by OSVs allowing them to travel further than if those tracks did not exist will be added to the FSEIS.</p>
202-3	<p><i>I can see how overuse would be frustrating to non-motorized users, but I spend a lot of time on trails open to all users, and it's quite rare to pass a snowmobile, and usually the experience last a few seconds and has yet to be negative.</i> Response: Your personal experience/perception of OSV use and actual impact to non-motorized users is similar to those disclosed in the SEIS (DSEIS, pg. 155) and the uncrowded experience identified in the NVUM (see DSEIS, pg. 23).</p>
202-4	<p><i>There are a lot of options for those wanting non-motorized options.</i> Response: Your observations about the availability of non-motorized areas is noted.</p>
202-5	<p><i>Snowmobiles provide a means to access lakes for fisherman, better slopes for backcountry skiers, safe trapping locations away from homeowners, and a great recreational opportunity for people otherwise not able to partake.</i> Response: OSV use is a valid recreational use of the National Forest.</p>
202-6	<p><i>In addition, Anaconda is starting to see revenue generation based on the above recreational opportunities. With lack of easy access to the "Wilderness" portion of the Pintlers, further restrictions on Snowmobiles in the front country would really hamstring the bulk of the access to wild terrain.</i> Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
202-7	<p><i>I read an editorial from the Wilderness Association that were not based on data and frankly represent outside interests.</i></p>

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	<p>Response: Your opinion concerning the Montana Wilderness Association editorial is noted.</p>
203-1	<p><i>I am a Butte resident writing in support of the current Modified Alternative 6 winter use plan for the Beaverhead Deerlodge National Forest (BDNF) as stated in the Draft Supplemental Environmental Impact Statement Winter Motorized Use (SEIS).</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
203-2	<p><i>As a backcountry skier, seeking terrain not accessible by foot, I ask that you not limit our snowmobile access on the BDNF. My family and friends use snowmobiles to access the mountain ranges around Butte, Anaconda, Phillipsburg, Dillon and around the Big Hole Valley. These closures would severely, negatively impact winter recreation for myself and a large group of other users of this nature. We ask that you keep the trails that are currently open to snowmobile use open.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-1	<p><i>I am writing this letter as a Deer Lodge County resident in support of the current Modified Alternative 6 winter use plan for the Beaverhead Deerlodge National Forest (BDNF) as stated in the Draft Supplemental Environmental Impact Statement Winter Motorized Use (SEIS).</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
204-2	<p><i>I provide these comments as a winter recreationist who enjoys a variety of winter activities on the BDNF to include backcountry skiing/ski touring, cross country skiing, on-area downhill skiing, out-of-bounds downhill skiing, hiking, and occasionally snowmobile touring. I am primarily commenting on the SEIS from the perspective of a backcountry skier utilizing snowmobiles as an approach vehicle to the high country. As a backcountry skier, the Anaconda/Pintler, Flint, Pioneer, and Beaverhead mountain ranges offer a unique skiing experience that is special to the BDNF and would not be available if additional restrictions are placed on snowmobiles in the high country.</i></p> <p>Response: Please see the response to comment 211-2. The SEIS has been updated to include additional discussion about use of OSVs to access backcountry winter non-motorized areas.</p>
204-3	<p><i>SEIS inadequately represents snowmobile use. While the SEIS presents some information relevant to winter recreation use, I feel the SEIS inadequately represents snowmobile use as all-inclusive of what one would think of as traditional snowmobile recreation (i.e. snowmobile touring). The SEIS does not differentiate between snowmobile use as a recreational activity on its own versus the use of snowmobiles as a vehicle supporting other activities such as ice fishing, winter mountaineering, winter camping, backcountry skiing,</i></p>

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	<p><i>trapping, hunting, backcountry cabin use, etc. that would not be possible without the access snowmobiles provide. Because of its size and geography, the BDNF provides a unique untrammled winter experience for these activities, most of which would not be available without access with a snowmobile.</i></p> <p>Response: This observation about the use of OSV to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-4	<p><i>The East Pintler/Anacondas should not have any additional snowmobile restrictions placed on it. The east end of the Pintler/Anaconda Range which I recently heard referred to as the “shoulder of the Anaconda-Pintler”, to include Sullivan Creek and the area around Barker Lakes, should be left open to snowmobile use. The majority of the Pintler/Anaconda Range is currently designated as wilderness and while I am a supporter of wilderness, I believe the Pintler Wilderness is well protected from encroachment as is. The east end of the Pintler/Anaconda Range (to include but not limited to Sullivan Creek and the area around Barker Lakes) is characterized by high rocky alpine terrain poorly suited for traditional snowmobile recreation but ideal for backcountry skiing and touring accessed by snowmobile. Having the eastern portion of the range available for winter access by snowmobile is an important high alpine area for winter enthusiast in close proximity to the local surrounding communities. The approach to the east end of the Pintler/Anaconda Range consists of traveling on logging roads through miles of clear cut forests. Without snowmobile access, the backcountry skiing of the east end of the Pintler/Anaconda Range would require several miles of low country approach along closed logging roads surrounded by clearcut. This would substantially degrade from my recreational experience and ability to access the high alpine terrain that I cherish and love.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-5	<p><i>Further, much of the true big game winter range in the area is fully protected from motorized encroachment in the Garrity Mountain State Wildlife Management Area. The front country access to the Barker Lakes area (i.e. the foothills of the range west of Garrity Hill towards Georgetown Lake) and Sullivan Creek drainage have limited importance as big game winter range; therefore leaving the area open to snowmobile use meets the minimization objective of Minimization Criteria 2) “Harassment of wildlife and significant disruption of wildlife habitat” (SEIS page 5).</i></p> <p>Response: Your personal observations of snowmobile impacts on wildlife on the BDNF are noted. Please see the response to comment 4-5.</p>
204-6	<p><i>The Flint Range should not have any additional restrictions made on the access to the high country. Significant portions of the range already have snowmobiles restrictions on them (e.g. Discovery Ski Area, Echo Lack Cross Country Ski Trails,</i></p>

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	<p><i>Lost Cr. Drainage, upper Foster Cr. drainage, upper Stucky Ridge to the Olsen Drainage, and Red Lion Mountain area) and offers ample, easily accessible snowmobile free recreational experiences. Please do not destroy the opportunity for accessing snow country around the communities of Anaconda, Philipsburg, and Deerlodge.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
204-7	<p><i>The Big Hole and Beaverhead Mountains should not have any additional restriction made on the access to the high country. The Big Hole and Beaverhead mountains offer ample nonmotorized areas bisecting significant portions of the range. Please do not destroy the opportunity for accessing the remaining high country in the Big Hole, it is an underutilized gem which provides opportunities to have a unique wilderness ski adventure in a rough and rugged backcountry setting.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-8	<p><i>Additional site specific snowmobile openings should be considered for backcountry ski access. While I believe the current Modified Alternative 6 winter use plan is a good all-encompassing management strategy, I do believe that additional site specific consideration should be made for alternative winter activities like backcountry skiing. Just because areas see limited snowmobile use by traditional snowmobile recreation does not mean that snowmobiles should be completely restricted. These types of areas may not have value from a traditional snowmobile recreationists view for a variety of reasons (e.g. thick timber, steep alpine terrain, inaccessibility, etc.) but they may have tremendous value for backcountry skiers or other winter recreationists utilizing snowmobiles as an access vehicle. A good example of this is the east end of the Pintler/Anaconda Range and specifically the recommended wilderness area currently restricting snowmobile use in the Twin Lakes, Lake of the Isle, and Mount Evans areas.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-9	<p><i>Additional access to approach these amazing alpine opportunities within minutes of Anaconda would enhance the socio economic welfare of the surrounding communities and specifically Anaconda.</i></p> <p>Response: Your support of continued OSV use to access backcountry snow for non-motorized recreation opportunities and possible socio economic benefits is noted.</p>
204-10	<p><i>Over the road vehicle accessed backcountry skiing is not readily available in the BDNF. Unlike many other areas where backcountry skiing is popular, the BDNF</i></p>

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	<p><i>has limited winter maintained roads bisecting the high country. The mountain ranges associated with the BDNF are generally inaccessible in the winter months without the use of a snowmobile.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-11	<p><i>Modified Alternative 6 currently meets all of Minimization Criteria stated in the SEIS. Snowmobile travel is necessary for backcountry skiing access in the BDNF. Much of the front country in question provides limited opportunities for snow based recreation as the snow pack tends to be thin, rotten, and increasingly affected by above average temperatures and winter rain events. Snowmobiles are necessary to traverse through these lowlands into the high country where the snow is suitable for skiing. In my opinion, using a snowmobile to access high quality ski touring is similar to a summer time hiker driving to a backcountry trailhead at the wilderness boundary. It would seem preposterous to have summer time users walk from the pavement to these trailheads through the clear cuts and other front country terrain, please don't impose this on winter users.</i></p> <p><i>- Opportunities for quite recreation are readily available in the area. There are several non-motorized and groomed XC skiing areas located nearby including the Mount Haggin Wildlife Refuge, Echo Lake Ski Trails, Homestake Pass, Chief Joseph Pass, and the Moulton Reservoir. Additionally I often enjoy other non-motorized winter recreation activities (e.g. hiking, ski touring, snowshoeing, etc.) in places where motorized users are allowed and rarely do I encounter snowmobile users. When I do encounter snowmobilers my encounters have been friendly and I would not consider them to detract significantly from my experience.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
204-12	<p>Snowmobile noise could be regulated rather than access restricted. I understand the proponents of additional snowmobile restrictions main argument about wanting to keep the winter backcountry quite. I too have found snowmobile noise to be obnoxious at times. If the main issue is noise as opposition to snowmobile use says it is, perhaps there may be a better way to solve the problem. Rather than limiting access, the solutions could be found in alternative noise regulations by the BDNF or even voluntary noise reductions measures implemented from the snowmobile community and industry.</p> <p>Response: Please see responses to comments 100-7 and 100-42 concerning OSV noise conflicts. The Forest Service has the authority to enforce noise standards set by the State of Montana which sets a limitation on machines built after 1975 of 78 dbA measured at 50 feet.</p>

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205-1	<p><i>I am a winter use visitor to the Beaverhead-Deerlodge NF. Although I reside in Helena, I have friends and relatives in Butte and friends in Wise River that I enjoy snowmobiling with. The BVRD has awesome snowmobiling opportunities. Generally, my wife, son, and I visit the area at least once per season. The areas we ride most often are the Scenic Pioneer Byway from the Pattengail to the Grasshopper, both sides of the Byway, Lacey Creek, O’Dell Creek to Wisdom, and Mono Creek to Comet Mountain.</i></p> <p>Response: These areas remain open to OSV use under all alternatives.</p>
205-2	<p><i>The latest trip was Pattengail to O’Dell Creek to Wisdom and back. We saw no wildlife. The only other users we encountered were other snowmobilers, and the parking lot was packed. We were surprised by some friends from Helena preparing for a fun-filled day in the snow. We had considered a trip to the Grasshopper to ride with the Dillon snowmobile club on February 20 and 21. There were no rooms available at the Grasshopper. It was totally booked. The amount of money that snowmobiling brings to restaurants, hotels, and convenience stores should not be ignored. If backcountry riding opportunities are diminished, local economies will suffer.</i></p> <p>Response: Thank you for your personal observations.</p>
205-3	<p><i>I support Alternative 4. Snowmobilers leave no trace and have no impact on wildlife. Snowmobilers should not be forced to loose valuable riding opportunities.</i></p> <p>Response: Your support of Alternative 4 is noted. Your personal observations regarding the effects of OSV use on wildlife on the BDNF are noted- Additionally please see the response to Comments 153-4 and 153-5.</p>
206-1	<p><i>Please strongly consider keeping the area around and including Mt Jefferson, MT open for public access; including: ATVs, snowmobiles, mountain bikes, etc. This is a popular area to all outdoor enthusiast and should remain open.</i></p> <p>Response: Your support for keeping the Mt Jefferson area open to OSVs is noted. While not considered in this SEIS, the Mt Jefferson Recommended Wilderness is closed to mountain bikes. This is the same area currently closed to OSVs.</p>
207-1	<p><i>As a snowshoer from Philipsburg, I try to avoid contact with snowmobilers. They are noisy and disruptive. I encourage a balanced recreation with wildlife habitat and winter range for big game.</i></p> <p>Response: Thank you, your recommendation has been noted.</p>
208-1	<p><i>I am writing this letter as an Anaconda resident who is in support of the current winter use plan for the national forest surrounding the Beaverhead-Deerlodge National Forest.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
208-2	<p><i>It is important to differentiate between snowmobile use alone as a recreational activity and the use of snowmobiles as a vehicle supporting other activities such</i></p>

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	<p><i>as ice fishing, winter mountaineering, winter camping, backcountry skiing, trapping, hunting, etc., that would not be possible without the access snowmobiles provide. These activities which are made possible with the use of snowmobiles provide an important draw for tourism and recruiting permanent residents to the nearby communities which are struggling to rebound after the loss of the mining and smelting industries which created them. People are seeking this region out as they look for less manicured country than Bozeman and Missoula.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
208-3	<p><i>As backcountry skiers, we utilize snowmobiles to get access the non-motorized wilderness experience. As far as the Pintlers go, most of the high elevation part of the range is already protected as a wilderness. The limited amount in the Pintlers that is still open offers tremendous opportunity to experience the alpine wilderness settings of the Pintlers without having to commit a week long trek much of which would be in the approach. In short, the alpine winter wonderland surrounding the Anaconda area could not be accessed without the use of snowmobiles, including the Flint Range.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
208-4	<p><i>Much of the front country in question provides limited opportunities for snow based recreation as the snow pack tends to be thin, rotten, and increasingly affected by above average temperatures and winter rain events. Snowmobiles are necessary to traverse through these lowlands into the high country where the snow is suitable for skiing. In my opinion, using a snowmobile to access high quality ski touring country is similar to a summer time hiker driving to a backcountry trailhead at the wilderness boundary (ie. Twin Lakes, East Fork Rock Creek, Carpp Lake, Storm Lake, ect.). It would seem preposterous to have summer time users walk from the pavement to these trailheads through the clear cuts and other front country terrain, please don't impose this on winter users.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
208-5	<p><i>Opportunities for quite recreation are readily available in the area, with several non-motorized and groomed XC skiing areas located nearby including the Mount Haggin Wildlife Refuge, Echo Lake Ski Trails, Homestake Pass, Chief Joseph Pass, and the Moulton Reservoir. We also enjoy non-motorized activities in places where motorized users are allowed. Both my wife and I will take advantage of the groomed snowmobile routes for XC skiing opportunities</i></p>

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	<p><i>without dogs. In fact we seek them out for the grooming and often find excellent skiing on freshly groomed surfaces during the week. Our encounters with motorized users have been friendly and I would not consider them to detract significantly from our experience.</i></p> <p>Response: We appreciate hearing about these positive recreation experiences on the BDNF.</p>
208-6	<p><i>The BHDL NF does not provide many opportunities for backcountry skiing without a huge approach across dry front country. Backcountry skiing in the BHDL NF almost always requires approaching the alpine with the use of a snowmobile. Please do not destroy the opportunity for accessing snow country around the communities of Anaconda, Butte, Philipsburg, and Deerlodge, it is an underutilized gem, which provides opportunities to have a wilderness ski adventure in a rough and rugged country.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
209-1	<p><i>I am an avid winter outdoorsman from the Anaconda area and would like to voice some concerns about limiting snowmobile access in the eastern portion of the pintlers. Unlike many other commenters, I am not an avid snowmobiler. Instead, I recently purchased a snowmobile to allow for winter access to ski amongst the beautiful peaks and valleys of the Pintlers. This area is a unique place. Unlike other major mountain ranges in the west there is not a maintained mountain pass or road system that provides winter sport athletes efficient access to its natural wonders. Already, the vast majority of the range is inaccessible to snowmobiles making winter recreation nearly impossible. Further limiting access would basically tell people they are only allowed to enjoy these mountains during what is a very short summer and fall recreation season. It seems reasonable to allow a small portion open so that it can be enjoyed year round. It is a public good after all.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
209-2	<p><i>Finally, I rarely see the masses of snowmobiles in this area thanks to the already well developed snowmobile parks nearby. In terms of environmental impact, I think the current traffic is having very little.</i></p> <p>Response: Your uncrowded recreation experience is reflected in the SEIS (DSEIS, pg. 23). Your personal observations about environmental impacts of OSVs is noted.</p>
210-1	<p><i>Montana Backcountry Alliance supports quiet winter recreation and the Beaverhead-Deerlodge has a wealth of world-class terrain well-suited to backcountry skiing. In particular, we are concerned about user conflicts on Mt.</i></p>

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	<p><i>Jefferson. This is an area of well documented user conflict which has been going on for well over a decade; monitoring here started in 2001 and illegal use has been documented every year since. This area should not be open to snowmobiles because by doing so it can't meet the minimization criteria/travel planning requirement to minimize conflict between OSV use and other uses of the same or neighboring federal lands - the other uses here being backcountry skiing in the same area and wilderness management on the adjacent BLM wilderness study area. For better or worse, we now have proof that having Mt Jefferson open to OSVs violates the minimization criteria. Dividing Mt Jefferson into motorized and non-motorized uses is not a feasible management strategy. The Forest Service and our partners at Winter Wildlands Alliance have documented illegal OSV use within the non-motorized area every year, and additional violations of the late-season (post May 15) closure every year except last year (when there was no snow). The late season closure is intended to protect spring bear habitat, but current management is failing to minimize impacts to bears too (aka significant disruptions of wildlife habitat). The BLM has documented illegal OSV use in their non-motorized WSA most years; allowing OSV use on the Forest Service part of Mt Jefferson is causing conflict with how the BLM manages their lands (by failing to minimize conflict between uses). Finally, even the Forest Plan says that if monitoring shows that OSVs aren't playing by the rules – showing that the Forest Service needs to revisit the rules.</i></p> <p>Response: Please see the SEIS and responses to comments 25-1, 99-18 and 99-54 concerning OSV incursions into the Forest Service recommended wilderness area and the BLM wilderness study area in terms of use conflict and actions being taken to reduce non-compliance. In response to effects to grizzly bears please see responses to comments 99-10, 99-31 and 148-19.</p>
210-2	<p><i>A second area of concern are the forest lands around the designated Chief Joseph cross-country ski trails. Chief Joseph provides top-notch cross-country skiing, but snowmobile use in this area is threatening quiet and solitude. The draft SEIS discusses this area of potential conflict around the Chief Joseph cross-country ski trails. While conflict has been avoided so far thanks to a verbal agreement between users, the Forest Service should formalize this agreement in the travel plan. Doing so will help prevent future conflict as new users and uses emerge on the landscape.</i></p> <p>Response: Please refer to the response to comment 99-55.</p>
211-1	<p><i>I have lived in Island Park, Idaho for 10 years. My home is at the base of the Centennial Mountains just below Reas Peak. Reas Peak is adjacent to Mt. Jefferson. I have snowmobiled in the Mt. Jefferson/Reas Peak area on many occasions. I have never seen elk, mountain goats, lynx, or wolverines in this area. The winter habitat is simply unsuitable for elk or mountain goats in the winter. Scientific studies in Central Idaho have proven that wolverines are</i></p>

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	<p><i>unaffected by snowmobiles. I have heard that the same is true of lynx. Therefore there is no justification for further restrictions on snowmobiling in the area based on wildlife.</i></p> <p>Response: Thank you for your personal observations. Please see the response to Comments 153-4 and 153-5.</p>
211-2	<p><i>The capability of snowmobiles to reach the back county plateaued about 10 years ago with the advent of the longer tracks, longer track paddles, lighter weight, and larger engines. Since that time, the trend has been toward lighter weight and smaller engines. The point is that the capability to reach the back country is not increasing because snowmobile capability is not increasing appreciably.</i></p> <p>Response: Many of the technological advancements that make snowmobiles more capable in the backcountry today appeared within the past ten years, but development continues in the industry. This is evident on the World Wide Web by visiting a number of industry websites and reports produced by the four major manufacturers of snowmobiles (Arctic Cat, BRP-Ski Doo, Polaris Industries, and Yamaha Motor Corporation) which describe their production lines of snowmobiles and many models designed specifically to handle back country conditions. Additionally, snowmobile clothing and avalanche protection equipment has advanced to accompany snowmobilers into the backcountry. A search on the World Wide Web will also reveal that there is enthusiasm amongst certain segments of the recreating public in backcountry snowmobiling. There one can find a number of recreation magazine articles, blogs and videos portraying backcountry snowmobiling experiences and activities. Most of enthusiasts describe a desire for physically challenging, alpine terrain with deep fresh powder, and many appreciate the low levels of crowding found in the backcountry. Many skiers are also using snowmobiles as a means to gain access to these backcountry conditions and to non-motorized areas that, due to distance, would not normally be accessible without a snowmobile. Snowmobiles allow these recreationists to reach day-trip distances of 10-20 miles from where they park their full-sized vehicle. The extent to which this use has increased on the BDNF is unknown; however, through agency patrolling and monitoring, common interactions with the public (including comments provided for this project), and responses to avalanche events and wintertime search and rescue, we feel certain that backcountry snowmobiling is occurring and gaining in some degree of popularity on the BDNF. The SEIS has been updated to include additional discussion about advances in OSV technology.</p>
211-3	<p><i>Further consider that Mt. Jefferson is accessed from the Idaho side of the Centennial Mountains. Snowmobile registrations in Idaho peaked in 2006 at 52,5981 and have decreased to 36,7321 in 2015. This is a 30% decrease in snowmobile registrations. Any effect that snowmobiles could have had on</i></p>

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	<p><i>wildlife in the Mt Jefferson area would have been at a maximum in 2006 and would have been decreasing since that time because of lower snowmobile numbers and plateaued snowmobile capability. If the trend in registrations continues downward any possible effect on wildlife would continue downward. The same argument can be made for any effect on non-motorized recreation in the Mt. Jefferson area if there were any.</i></p> <p>Response: The information you provided in terms of snowmobile registrations has been noted. We considered using snowmobile registrations as an indication of increases or decreases in OSV use. However, in Montana, snowmobiles are no longer annually registered making a comparison of OSV registration in the early 2000's to date inaccurate. Please see response to comment 99-10, 99-32 and 99-31 concerning analysis related to impacts on wildlife.</p>
212-1	<p><i>The winter motorized plan for the bdnf should remain as it presently is. The current plan included many thoughtful compromises between snowmobilers and wilderness advocates. Many tens of thousands of historically used snowmobile areas have been closed to that use during the years since 1977. Enough is enough.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
213-1	<p><i>I am a Butte resident in support of the Modified Alternative 6 winter use plan for the Beaverhead Deerlodge National Forest (BDNF) without any additional motorized winter closures. I heavily use the BDNF for a variety of winter activities, including cross-country skiing, backcountry skiing, downhill skiing at Discovery Ski Area, hiking, and snowmobiling. I see the Montana Wilderness Association (MWA) wishes to further restrict winter access to the forest, but Modified Alternative 6 is a balanced approach that minimizes the negative impacts to non-motorized recreationist and wildlife.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
213-2	<p><i>I am primarily commenting on the SEIS from the perspective of a backcountry skier that uses a snowmobile to approach the high country. The Anaconda/Pintler, Flint, Beaverhead, Pioneer, and Sapphire mountain ranges offer very limited backcountry skiing opportunities with regular vehicle access, but does provide some good backcountry skiing opportunities that would not be available if additional restrictions are placed on snowmobiles in the high country. When backcountry skiing, I avoid the heavily used snowmobile routes for the reasons identified in the SEIS (p. 153-156) where snowmobiles often compete for untracked snow off the established routes. We have lost some backcountry ski terrain as snowmobiles have become more powerful and maneuverable through steeper treed terrain. I find the intermediate or seldom used roads provide the best backcountry ski experiences. These routes usually dead end after 3 to 10 miles, which usually deters snowmobilers from using them as no one want to haul a snowmobile to a place where you can only ride</i></p>

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	<p><i>for an hour or less. To consider closing seldom used routes because they are infrequently used does not make sense. If infrequently used, they by definition have minimal negative impacts on other users and wildlife.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
213-3	<p><i>I do not favor any of the MWA proposed restrictions, specifically: The east end of the Pintler/Anaconda Range, to include Sullivan Creek and the area around Barker Lakes, should be left open to snowmobile use. The majority of the Pintler/Anaconda Range is currently designated as wilderness and while I support wilderness and enjoy the AP Wilderness, I believe it is well protected from encroachment as is. The east end of the range is characterized by high alpine terrain that is generally poorly suited for traditional snowmobile recreation but ideal for backcountry skiing and touring accessed by snowmobile. Having the eastern portion of the range available for winter access by snowmobile is an important for winter enthusiast in close proximity to the local surrounding communities. Further, much of the true big game winter range in the area is fully protected from motorized encroachment in the Garrity Mountain State Wildlife Management Area. The front country access to the Barker Lakes area (i.e. the foothills of the range west of Garrity Hill towards Georgetown Lake) and Sullivan Creek drainage have limited importance as big game winter range; therefore leaving the area open to snowmobile use meets the minimization objective of Minimization Criteria 2) “Harassment of wildlife and significant disruption of wildlife habitat”.</i></p> <p>Response: Your support of Alternative 6 Modified is noted. Please refer to the responses to Comments 7-1 and 99-10.</p>
213-4	<p><i>The Flint Range should not have any additional restrictions made on the access to the high country. Significant portions of the range already have snowmobiles restrictions on them (e.g. Discovery Ski Area, Echo Lake Cross Country Ski Trails, Lost Cr. Drainage, upper Foster Cr. drainage, upper Stucky Ridge to the Olsen Drainage, and Red Lion Mountain area) and offers ample, easily accessible snowmobile free recreational experiences. Please do not destroy the opportunity for accessing snow country around the communities of Anaconda, Philipsburg, and Deerlodge.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
213-5	<p><i>The Big Hole and Beaverhead Mountains should not have any additional restriction made on the access to the high country. The Big Hole and Beaverhead mountains offer ample non-motorized areas bisecting significant portions of the range. Please do not destroy the opportunity for accessing the remaining high country in the Big Hole, it is an underutilized gem which provides opportunities to have a unique wilderness ski adventure in a rough and rugged backcountry setting.</i></p>

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	Response: Please see the response to comment 204-7.
213-6	<p><i>Finally, I find there are plenty of cross-country skiing opportunities in the Butte-Anaconda region. I frequently use the Moulton ski trails, but also find Mt Haggin, Echo Lake, and Storm Lake road provide good classic and skate ski opportunities and rarely see other skiers on these trails and only a few vehicles parked at the trail heads. I do not believe additional road closures are necessary for non-motorized recreationists.</i></p> <p>Response: Your uncrowded recreation experience is reflected in the SEIS (DSEIS, pg. 23).</p>
214-1	<p><i>I am writing today to ask that you prioritize protecting wildlife habitat from motorized use and human intrusion when at all possible. Wildlife struggling to survive, especially in brutal winter conditions, need to have an ecosystem free from the noise and stress of snowmobiles and other motorized vehicles. Please make wildlife a priority over human motorized recreation. People have plenty of areas to use their motorized vehicles.</i></p> <p>Response: Your view is noted.</p>
215-1	<p><i>I moved to Wise River, Montana, as a kid in 1966, and began snowmobiling the Pioneers in 1972. Growing up, we snowmobiled everywhere. It seems like there was more snow back in the 1970's than there is now. Currently I live in Missoula, but I try to make it down to ride the Pioneers each season. Most recently, my daughter and I participated in the Wise River Jackpine Savages fund raising poker ride through the Pioneers, dropping \$60 in donations. I snowmobiled extensively in the Great Burn west of Missoula for years, but not anymore! When I hear of groups suggesting noise and animal stress is an issue, I have to ask myself "where are they?" (Both the animals and the people.) Game is non-existent at the high elevations of these areas. I rode into Odell Lake on the day of the poker ride and was hoping to see a moose, but saw nothing. Not even a track. It is not uncommon to see elk, moose, and deer, generally while still in my vehicle headed up the road.</i></p> <p>Response: Your observations about the presence and response of big game animals to OSVs is noted.</p>
215-2	<p><i>Some sledders like to attach after market performance accessories to their sleds, often times resulting in increased noise levels. I personally don't care for the noise and leave mine stock. Enforcement of noise standards when checking for trail decals could help reduce that.</i></p> <p>Response: Please see response to comments 100-42, 100-7 and 204-12. The Forest Service has the authority to enforce noise standards set by the State of Montana which sets a limitation on machines built after 1975 of 78 dbA measured at 50 feet.</p>
215-3	<p><i>I fail to see how there is any impact on the land from snowmobiling. I have been into the West Pioneers on pack trips in the summer and the only impact I ever</i></p>

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	<p><i>saw was from 4-wheelers. I have been into The Great Burn during the summer and have never seen snowmobile related impact. (As I walked up the mining road I asked myself how it could be a WMA) My experiences with skiers and fat tire bikes has always been good. I even tried out a fat tired bike one time! And I have always felt snowmobiles actually help water conservation efforts by packing the snow and slowing the spring melt and associated run-off. (Ok, this might be a bit of a stretch!)</i></p> <p>Response: Your observations about the impacts of OSVs in the West Pioneers is noted.</p>
215-4	<p><i>Wintertime motorized recreation is a huge industry and will continue to grow. To lock up thousands of acres by turning it into a de-facto wilderness with the stroke of an administrative pen is irresponsible. There is no good reason to restrict sledders from enjoying the high mountain riding offered by the Pioneers and Great Burn.</i></p> <p>Response: The SEIS discloses potential impacts from OSV use on the BDNF.</p>
216-1	<p><i>Mount Jefferson, I would like to see more emphasis on protecting Mount Jefferson and the surrounding area. Mount Jefferson is the start of the Missouri-Mississippi river system the 4th longest river system in the world totaling 3,870 Miles. As the beginning source of this mighty river system this area should be given special attention to preserve its natural characteristics. One suggestion I would like to see payout is adding Mount Jefferson MA with Centennial MA to make one designated wilderness area. If this is not possible to combine the two MA areas into one area, then I would request that the Mount Jefferson area be non-winter motorized to ensure the security of its natural integrity</i></p> <p>Response: The BDNF does not have the legislated authority to designate the Mount Jefferson Recommended Wilderness and Centennial MAs as wilderness. Alternatives 2, 3 and 5 consider allocating the entire BDNF portion of Mt Jefferson as non-motorized.</p>
216-2	<p><i>Pioneer Mountains, West Pioneer WSA was established in 1977 and in 1981 the wilderness study resulted in non-wilderness recommendation. I would like to see the possibility of another wilderness study to be done to see if the West Pioneer would qualify now. Relying on test results from 1981 (35 years ago) does not seeming fitting for a management plan for the 21st century. This area should be treated as wilderness until congress declares otherwise. There should be no summer or winter motorized travel within this area. If we cannot revisit the wilderness study then at least this area should remain completely non-motorized (Summer/Winter) and quite until it can be designated as wilderness or until it's determined not qualified for wilderness.</i></p> <p>Response: Please see the response to comment 100-41.</p>
216-3	<p><i>Anaconda-Pintlar Wilderness, The additions of Storm lake, Upper East Fork, and Hellroaring should be added. This was a great recommendation! In the Fishtrap</i></p>

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	<p>– <i>Mount Haggins MA it would be nice to see a buffer zone between the AP wilderness and the road based recreation area. Currently the buffer area is summer non-motorized, in this area winter non-motorized addition would help to ensure the protection of the AP Eastern boundary. I would like to see the same process for the Pintler Face MA and Tie-Johnson MA.</i></p> <p>Response: The BDNF does not have the legislated authority to legislate additional wilderness areas. The Forest Service does not have evidence of impacts to the Anaconda-Pintler Wilderness area from OSV use in areas open to OSV outside the wilderness area.</p>
216-4	<p><i>Upper Rock Creek MA, I think the recommended wilderness additions of Quigg RWA and of Stony Mountain RWA would be great addition to complement the already existing wilderness to the West (Welcome Creek.) The Sapphire WSA to the south of Stony Mountain and to the north of the AP would make a huge wilderness system to help preserve the Sapphire mountains ecosystem and its Roadless qualities. This area on the East side of the Sapphire Mountains has a lot of potential but has not been given the recognition that it deserves. I would like to see a strong grouping of wilderness from Quigg Peak in the north to the AP in the south. The Sapphire WSA should be up for consideration for a possible wilderness addition.</i></p> <p>Response: The 2009 Forest Plan recommended these areas as wilderness. However, the BDNF does not have the legislated authority to designate wilderness.</p>
216-5	<p><i>As a 3rd Generation Montanan from Ravalli County I love the land I call home more than anything. We have some of the last true remaining wilderness left in the lower 48 states. Tourism is the biggest and fastest growing area in the Montana economy. California has a lot more people and a lot more wilderness, I would like to see BDNF put aside some of the precious Roadless area that we have left. Please keep what Roadless area you have Roadless. Work to make more areas quiet and accessible for all to enjoy. It would like to see a wilderness area proposed for the Tobacco Root MA as well.</i></p> <p>Response: The 2009 Forest Plan recommended numerous areas for wilderness and analyzed remaining inventoried roadless areas. This analysis does not propose altering recommended wilderness or roadless area boundaries.</p>
217-1	<p><i>My family and I enjoy snowmobiling on Mount Jefferson. I want to make sure that this opportunity will still exist for my children and grandchildren. We bought a cabin in the Island Park area for our snowmobiling and don't want to see any areas close. Please consider our and other outdoor recreationalists use in making your plan, as well as the area businesses that rely on winter recreation to keep their businesses going.</i></p> <p>Response: Your preference for continued OSV use of the Mount Jefferson area is noted.</p>

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218-1	<p><i>I oppose closure of any additional forest lands to winter-motorized use. I am a regular user of National Forest lands for hiking, mountain biking, horseback riding, snowmobiling, cross-country, downhill, and backcountry skiing. I have ample opportunity to enjoy non-motorized recreation but am disturbed by the continual closure of lands to motorized activities.</i></p> <p>Response: Your support of Alternative 6 Modified and personal preference for non-motorized recreation opportunities is noted.</p>
218-2	<p><i>During the winter months, I use public USFS land south of Anaconda and in the Flint Creek and Sapphire Mountains for both snowmobiling and backcountry skiing. I often use a snowmobile to access the backcountry for skiing. I have yet to encounter a cross-country skier while snowmobiling.</i></p> <p>Response: Your preference for motorized and non-motorized recreation opportunities is noted.</p>
218-3	<p><i>Based on my experience, I do not believe there is a need to further restrict winter motorized use. And, as the plan acknowledges, much of the land open to snowmobiling is not accessible to snowmobiles. Doesn't this in effect make it non-motorized? I also believe it would be more informative to everyone to delineate land not accessible to motorized use on the maps. Otherwise, the maps give the false impression that most of the forest is available to motorized use.</i></p> <p>Response: Your preference for Alternative 6 Modified is noted. Accurately mapping areas accessible by OSVs would be challenging due to variations in user skill levels, type and power of machine and continually changing snow conditions as weather systems move through the area.</p>
218-4	<p><i>If the Forest Plan's goal is to balance all uses and protect resources, I prefer Alternative 2 or Alternative 5 if it is modified to not include additional proposed wilderness.</i></p> <p>Response: Your support of Alternatives 2 and 5 are noted.</p>
219-1	<p><i>I am writing this letter as a Butte resident in support of the current Modified Alternative 6 winter use plan for the Beaverhead Deerlodge National Forest (BDNF) as stated in the Draft Supplemental Environmental Impact Statement Winter Motorized Use (SEIS). I provide the below comments as an avid backcountry skier utilizing snowmobiling as a transport vehicle to the high country where I then put my skins and start climbing under my own power.</i></p> <p>Response: Your support of Alternative 6 Modified is noted. This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
219-2	<p><i>The Anaconda/Pintler, Flint Creek, Pioneer, and Beaverhead mountain ranges all offer endless backcountry skiing opportunities; however, most of the roads into these mountain ranges are not plowed in the winter, making day trips impossible. I will no longer be able to ski the places I have grown to love in these ranges if snowmobile restrictions are emplaced. As a backcountry skier, I routinely utilize snowmobiles to access the high country and alpine in the mountain ranges surrounding Butte, Anaconda, Phillipsburg, and Dillon. Areas</i></p>

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	<p><i>I personally frequent include (but not limited to) the Darkhorse and Ajax areas in the Beaverheads; Birch Creek and Coolidge in the Pioneers; the Middle Fork of Rock Creek, Storm Lake, and Nelson/Barker Lakes in the Anaconda/Pintlers; and the Red Lion area in the Flints. The Anaconda/Pintlers offer a particularly unique backcountry ski experience. Although much of the range is designated wilderness, the relatively limited snowmobile access offers tremendous opportunity to experience the alpine wilderness settings of the Pintlers without having to commit to a week long trek, much of which would be the approach through vast clear cuts and less appealing front country terrain.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
219-3	<p><i>Much of the front country in question provides limited opportunities for snow-based recreation, as the snow pack tends to be thin and increasingly affected by above average temperatures and winter rain events. Snowmobiles are necessary to traverse through these lowlands into the high country where the snow is suitable for skiing. Using a snowmobile to access high quality ski touring country is similar to a summer time hiker driving to a backcountry trailhead at the wilderness boundary (i.e. Twin Lakes, East Fork Rock Creek, Carpp Lake, Storm Lake, ect.), especially considering some of the old, loud, and high emission vehicles I have seen at these trailheads in the summer, not to mention loud alcohol fueled parties that sometimes litter camp spots with broken glass. It would be impractical to have summer time users walk from the pavement to these trailheads through the clear cuts and less appealing front country terrain - please don't impose this on winter users.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
219-4	<p><i>I am also an avid XC skier and am currently a board member for the Mile High Nordic Ski Education Foundation (MHNSEF). Opportunities for quite recreation are readily available in the area, with several non-motorized and groomed XC skiing areas located nearby including the Mount Haggin Wildlife Refuge, Echo Lake Ski Trails, Homestake Pass, Chief Joseph Pass, and the Moulton Reservoir; I have also found numerous quite recreation opportunities outside these designated ski areas. I also frequently utilize snowmobile routes for XC skiing opportunities with our dogs. My encounters with motorized users have been friendly and I would not consider them to detract significantly from my experience.</i></p> <p>Response: Your uncrowded experience is supported by analysis in the SEIS (DSEIS, pg. 23).</p>
219-5	<p><i>The BDNF does not provide many opportunities for backcountry skiing without a huge approach across front country with a thin snowpack, requiring a</i></p>

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	<p><i>snowmobile for the approach to make day trips possible, especially for working professionals like myself who can usually only get out on the weekend. Please do not destroy the opportunity for accessing snow country around the communities of Anaconda, Butte, Philipsburg, and Deerlodge, it is a treasure I do not take for granted and has provided me countless wilderness ski adventures in rough and rugged country.</i></p> <p>Response: This observation about the use, by non-motorized recreationists, using OSVs to access certain area of the BDNF before beginning their preferred recreation experience will be added to the SEIS.</p>
220-1	<p><i>I am writing to encourage the forest service to adopt a common sense amendment that balances recreation with Quiet wildlife habitat and winter range for big game. I think that we can be extremely proactive in establishing a balance with all concerned. It is important that the quiet recreational people do not have to compete with the noisy, polluting snowmobile crowd in our pristine forest. We must take action to secure these areas so they remain quiet for people and animals. It is the least we can do.</i></p> <p>Response: Alternatives considered in the SEIS provide options for balancing the uses and resources identified in this comment.</p>
221-1 & 222-1	<p><i>We routinely recreate in a multitude of ways in the B-D National forest. We do a little bit of everything, including fishing, hunting, camping, snowmobiling, hiking, ATV riding, motorbike riding and so on. My husband grew up in this forest and has already seen much of the areas we previously enjoyed be closed to motorized access. We also make trips to Island Park and there is no reason Mount Jefferson should be closed as the environment groups are pushing. This is a key destination for snowmobilers from Island Park and adding further restriction to this area would be a severe detriment to the economic and social sustainability of Island Park.</i></p> <p>Response: Your support of continued OSV use on the BDNF, including the Mt Jefferson area is noted.</p>
221-2 & 222-2	<p><i>I really would like to know where and how your NVUM surveys are conducted. From our observations compared to the numbers you've listed in the Draft EIS regarding snowmobiling compared to cross country skiing usage do not make sense.</i></p> <p>Response: Please see the response to comment 99-15.</p>
221-3 & 222-3	<p><i>There is no reason necessary to further restrict access in the B-D. I am writing in support of alternative 4 in your response to the US District Court for the District of MT on the 2005 Travel Management Rule - Supplemental EIS.</i></p> <p>Response: Your support of Alternative 4 is noted.</p>
223-1	<p><i>The elk, deer and a good portion of low elevation mountain goat winter range habitat on the east side of the Big Hole valley is closed to snowmobiles and has been since the 1980's. Our local knowledge suggests that these closures are</i></p>

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	<p><i>supported by the public and are effective. The rest of the elk, deer and likely a large part of the goat herd in the upper Big Hole leave the valley for Lemhi County and the Salmon Challis National Forest and the Bitterroot Valley in the East Fork.</i></p> <p>Response: Thank you for your personal observations. Your personal observations regarding the winter range use on the BDNF are described in the updated big game section in the FSEIS.</p>
223-2	<p><i>Moose in the Big Hole in the winter are largely on private land. We see this pattern every day and we believe the pattern has been reinforced by the introduction of wolves. There are extensive privately owned swamps and willow complexes as well as haystacks that moose use in the winter. Additionally, moose sense they are safer around the cows, guard dogs, roads and ranches than sharing the deep snow on the National Forest with wolves. This is the same pattern seen in many elk herds. Because of this distribution, we doubt snowmobiling on the National Forest is having much impact on moose wintering in this valley.</i></p> <p>Response: Your conclusions (or personal observations or opinion) regarding the effects of OSV use on moose on the BDNF are noted. Additionally, please see the response to comment 100-24.</p>
223-3	<p><i>As we understand it, research on pine martin in the 1990s on the Wisdom District suggested that trapping mortality on open roads was adequately offset by pine martin populations expanding out of the large inaccessible areas where trappers don't venture. Later research in the Pioneers on wolverines generally found that trapping, outside of natural mortality, seemed to be the primary limiting factor in wolverine populations. Granted snowmobiling may be the means of travel for trappers, however, if you want to lessen this mortality go for the cause and effect and restrict trapping not snowmobiling.</i></p> <p>Response: Thank you, your observations/opinion has been noted. Trapping seasons are controlled by MFWP, not by the Forest Service and therefore outside the scope of this document. Additionally please see response to comment 148-10.</p>
223-4	<p><i>The closed areas to snowmobiles on the north and west Side of the Big Hole Valley including the Anaconda Pintler Wilderness and its additions, Anderson Mt, the Sheep Mtn Area and the Hamby/Pioneer area were specifically designed to provide quiet areas for goats, wolverines and other species.</i></p> <p>Response: Areas closed to OSV use were closed to protect mountain goats and wolverine, recommended wilderness and provide non-motorized winter recreation opportunities in the absence of motorized recreation.</p>
223-5	<p><i>It should be remembered, that snowmobiles typically cannot get off existing trails due to heavy timber. Granted open areas access by roads and trails are often used by snowmobilers. It should also be noted that open parks without</i></p>

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	<p><i>trails or roads are not used by snowmobiles. There are vast areas of National Forest land not traveled by snowmobiles due to vegetation and topography. You need to consider suitable snowmobiling areas in your calculations. Just because it is open does not mean it is used by snowmobilers. If you would like, we can help you map these areas.</i></p> <p>Response: The SEIS differentiates between acres open to OSVs and acres usable by OSVs (DSEIS, pg. 23-28).</p>
223-6	<p><i>Technology is changing. We have started seeing a small number of motorcycles with skis and tracks. We understand that these machines are capable of travel into new areas. This change in technology may deserve a closer look.</i></p> <p>Response: Please see these response to comment 99-61.</p>
223-7	<p><i>On the Wisdom District non-motorized access or quiet recreation such as cross country skiing and snowshoeing to the National Forest in the winter months is very limited. Most plowed access terminates well beyond the Forest Boundary with one exception; the highway 43 corridor west of Wisdom. Outside of highway 43, most skiers actually access backcountry ski opportunities on the Wisdom District on snowmobiles. On the highway 43 corridor, the popular quiet recreation areas are closed to snowmobiles in the current forest plan. There are corridors to get snowmobiles to the more distant motorized areas off highway 43. There are parking lots designed for skiers and other designed for snowmobilers. This seems like a good strategy.</i></p> <p>Response: Your support of Alternative 6 Modified is noted.</p>
223-8	<p><i>As a group, we do not know of impacts to soils or watershed from current snowmobiling activities. When snow depths are shallow and soils and vegetation might be damaged, snowmobiles largely stay on the roads. When snow depth get deep enough to avoid rocks and logs, snowmobiles are well off the soil. Snowmobiling in willow bottoms or near streams is well known as a way to get stuck and wet and is avoided.</i></p> <p>Response: Your personal observations regarding the effects of OSV use on soil, water and vegetation on the BDNF are noted as effects common to all alternatives in all landscapes are described in the DSEIS (beginning at pg. 92).</p>
223-9	<p><i>Snowmobiling is an economic driver in the Upper Big Hole Valley; it brings diversity and does contribute to the economy. Many locals in the valley snowmobile for recreation. It is an important opportunity for people making a living and just living in this valley.</i></p> <p>Response: Your views are noted. Please see response to comment 26-3.</p>
224-1	<p><i>Most critically in need of review are the rationales regarding over-snow use in wildlife habitat: that areas were left open because they weren't used much historically, that difficulty of terrain is a limiting factor, and that wildlife will move if disturbed. Anyone who has seen the advances in over-snow technology and the continuing increase in recreational use, which the Plan acknowledges,</i></p>

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	<p><i>knows these rationales are not justifiable. We trust you will revisit high value wildlife areas, and where appropriate, amend with closures. It shouldn't be a problem for those areas that still aren't used much or are still hard to get to.</i></p> <p>Response: The SEIS analyzes the impacts of those areas open to OSV use. The analysis shows there are very few places on the Forest where there are potential effects to wildlife. Please see Response to comment 99-10.</p>
224-2	<p><i>Of most concern to us is the integrity of the Forest Plan itself. The biggest comment issue from the public's perspective was motorized winter use in the Mount Jefferson area. Even though the resource specialists are those employees closest to the issue recommended a better closure boundary (Continental Divide), then Regional Forester, Tom Tidwell, compromised and gave motorized users and politicians what they wanted with the responsibility to adhere to the closures in place...It's been six years and the trespass continues. The attached picture, in addition to years of monitoring (since 2001), demonstrates that signing and education are not the issue, but rather blatant disregard for the closure boundary...By allowing trespass into closed areas, and not doing what the Plan says, any and all closures are subject to non-compliance. This doesn't just impact this area, or this Forest, it impacts all public lands...We sincerely hope you uphold the Forest Plan's words and intent by action, without further delay, and change the boundary for Mount Jefferson to something that can be enforced.</i></p> <p>Response: Please see the response to comment 25-1 and the SEIS discussing new efforts being undertaken to educate the public and to have an effective closure boundary.</p>