

September 19, 2019

'Taylor Hellroaring Project Objection'

Objection Reviewing Officer
USDA Forest Service Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Sir,

We have requested to be notified for all projects in the Tally Lake District, most specifically for this project. Once again, we were not notified of this current updated version of this project. We read about it in the Daily Inter Lake newspaper. We have supplied our updated mailing address in person and by fax on more than one occasion and have received other district notices. However, we should have been notified about these revisions for this proposal. This continuing lack of notice about the Taylor Hellroaring project updates shows blatant disregard of our rights because our comments have always been in opposition to this project. Therefore, we request written notifications from you regarding this project or any other proposals in the Tally Lake Ranger District in the future. We have again enclosed a separate page with this letter showing our names, address and phone number.

After reading about the last comment period in the local paper we sent a letter for the April 23, 2019 comment period. Our letter was timely postmarked. We have proof of mailing because our letter was mailed by certified mail. We included a separate page showing our current mailing address and phone number. Your current 'Draft Decision Notice, Finding of No Significant Impact, and Response to Comments for the Taylor Hellroaring Project', dated August 2019 failed to list our names as commenters on the April 2019 Taylor Hellroaring Project Environmental Assessment, Page C1. The comments we made in our letter were ignored, as was our letter.

We own property in Section 3, Township 31 North, Range 22 West. The Northern boundary of our property is Forest Service. This project will directly impact our property.

After reviewing the revised Taylor Hellroaring Project Environmental Assessment, dated August 2019 and the Draft Decision Notice, Finding of No Significant Impact, and Response to Comments for the Taylor Hellroaring Project, dated August 2019 for this project we have very serious reservations regarding the scope of this project. We oppose this project for the following reasons.

1. Continual blatant disregard of our rights to legal notice, as adjoining property owners after we have made this request multiple times. Also, not including our last letter with opposing comments in your response.
2. The trails, (our yellow highlighted trails) listed on 'Trail Management Activities' – A6 (Exhibit #1) are depicted as flat maps on our Exhibit #2 and Exhibit #3, as attached. The maps should be shown on United States Department of the Interior

Geological Topographic Survey Maps to accurately show the terrain of this project. We have attached a copy of this survey map, see Exhibit #4. The trails cannot be built as drawn. This is not an accurate trail layout on this terrain. According to your stated trail design requirements the trails will have a 10 % average grade. This is not humanly possible, as shown on the actual terrain.

3. Chapter 2, page 20, talks about trail design ideas, but does not show actual design plans for the public comment. This project should depict all of the trails, even the possible trails on adjoining private property. Private property owners can not realize the impact on their property without full disclosure of this information.
4. This project does not list for public review the planned budget costs for this proposal or proposed plans for funding of development costs for this project. This is essential information for public review. If a proposed budget for this project has not been determined, then this project should not be reviewed at this time by the public.
5. Maintenance expenses for these trails is not included. Future funds for maintenance of these trails is not listed. Private partners and their monetary fund contributions are not depicted. Also, contracts for private partners are not attached for review.
6. Information regarding budget money in the Forest Service general operating budget for easement procurement on private adjoining properties is not included for review. The actual easement locations are not shown.
7. Historically Special Use Access Permits for adjoining private property owners have specified in the permit for Section 34, Township 32 North, Range 22 West that this is part of Grizzly Bear habitat and limits this access seasonally. Seasonal trail or road use closures are not specified in this project. It is common practice by the Forest Service to close gates and trails in areas with the rational of Grizzly bear dens and wildlife habitat. The trails shown in this project will be opening areas of the Forest Service to hikers, bike riders or horse trail riders that may or may not have any knowledge of the potential dangers of using these trails. For many years, articles have appeared in papers regarding human attacks by animals or bear warnings. We have listed a few of these articles. They are:

Grizzly Bear Sighting on June 6, 2019, posted by Whitefish Legacy Partners.
Bears emerging from dens across Northwestern Montana, dated March 30, 2018 by the North Fork Preservation Association.

Mountain Biker Killed by Bear in Montana, by Aaron Teasdale, National Geographic on line article.

Grizzly Attacks Hiker Near Whitefish, From the When Wildlife Goes Wild – Montana edition series, Oct. 17, 2016.

Grizzly Activity Causes Temporary Trail Closures in Glacier, Daily Inter Lake, August 19, 2019.

Survivor Recounts Grizzly Bear Attack in Northwest Montana, by Nicky Outilet, Montana Public Radio, Published 4:34 p.m. MT Feb. 23, 2019

Mauled Mountain Biker was Riding Fast Before Grizzly Bear Attack, The
Spokesman-Review, March. 8, 2017

Mountain Biker Has Lion Scare on Whitefish Trail, Daily Inter Lake, June 28,
2019

The area being opened to the public by these trails is known Grizzly Bear Habitat. This plan does not show monitoring for potential bear sightings in order to have the trails closed until the danger is negated. Nor does this plan list a method to physically close the trails.

8. Section 34 is listed under the Forest Service "Endangered Species Act of 1973 (16 U.S.C. 1531)". The rules under this act must be enforced and do not appear to be under this project. We have not found this act cited in either of the documents for public review at this time
9. This project does not protect adjoining property owners from trespass by the public using the trail system. The Forest Service must install fencing or a solid physical barrier along our common border with the Forest Service to prevent hikers, bike riders or horse trail riders from taking a short cut through our property. Thus assuring us protection to our property rights and limiting our liability from any public use of our property without our permission. These trails will create a public nuisance and place an un-do burden on adjoining property owners. Currently, the 40 mile trail system in this project does not have legal access and does not have a large amount of public use. This Forest Service property is very limited to any public use and is portrayed in our Exhibit #5, which is attached. This photo is printed from the Montana Cadastral website for this area.
10. Direct and In-direct Effects, Chapter 3, page 21, No specific information is given as to the method of logging, access to the trails for new construction, trail design or treatment of slash material. For instance is the trail being built through old growth timber or open meadows? The proposal does not show removal methods for the timber being removed. The specific trail design and effects of logging of these trails must be shown for public review.
11. This proposal does not adequately address problems that will arise from public use on the trails. Camp sites are not designated with fire rings and other amenities. Public use toilets, garbage containers etc. are not designated nor budgeted for initial placement or on-going clean up trail maintenance. These items need to be addressed now before serious problems occur in the future.
12. The Forest Service must provide liability for fires that may be caused by careless campers or even day use hikers, bike riders or riders on horses. This project does not show a plan for dealing with possible future fires. Details must be shown for public review and comment.
13. This project does not factually show the stated reasons for the necessity of these trails "to overcome current over crowded trails and trail conflicts". Research shows the following books and websites that give hiking and mountain bike trails

listings of over 700 miles. We have listed a few of the sources that we found with our research. They are as follows:

Mountain Bike Adventures in Northern Rockies, by Michael McCoy
Hiking Montana: A Guide to the State's Greatest Hikes, by Bill Schneider and Russ Schneider.
Mountain Bike Trails in Northwestern Montana with a trail guide.
Biking the Flathead – World Class Riding from Road, Rail-Trail to Singletrack Awaits in Northwest Montana
Biking in Western Montana + Glacier National Park
Moab of the North
The Best Mountain Bike Trails in Montana
Best Mountain Biking Trails in Montana at All Trails
Five Western Montana Hikes that Will Make Your Summer
Best Trails in Montana at All Trails
The 10 Best Montana Hiking Trails in Montana by Trip Advisor

The trails, as proposed are not necessary, but will connect the existing trail system already in place surrounding Whitefish. Your reference to the 1991 Flathead County economic review that states that Whitefish are better educated and more affluent people, does not justify this trail system expense for their benefit. Your reasons, as stated, in the proposal are not viable reasons for building of trails when the building costs, actual trail location and design are unknown at this time or the Forest Service is not willing to share this information with the public for review and comments.

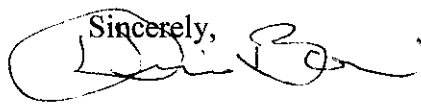
14. County law enforcement officers are not allowed to oversee conflicts on Forest Service Land. This project does not address how the Forest Service will address conflicts, access to handle a conflict or a budget amount for these potential problems. Currently, Forest Service Law Enforcement Officers will not work on weekends in the Tally Lake Ranger District due to budget restraints.
15. This project does not address access, the agency responsible or a budget amount to address any emergency or medical issues by the public in their use of the trails.
16. This project is very inadequate in the statement regarding weed suppression and control on the trails. It is totally impracticable to state that toxic weed spray will be carried in and sprayed from hikers wearing these backpacks. Toxic weed spray experts need to be licensed for applying this spray. The person or persons responsible are not listed, nor are the projected costs.

Many roads and trails have been gated on the Forest Service lands, county and state wide, with the excuse of 'no money' or 'lack of money' to keep them open. We feel the money spent on at least two very expensive environmental assessments, two draft decision notices, costs for construction for the trails (which are not detailed for public review), actual location of some of the trails and future costs for the management of these trails

Page Five, Taylor Hellroaring Objection

would be better spent on improving the existing roads and trails to keep them open for the benefit of everyone not just a select few.

Also, we feel you will be creating a major public nuisance with this project for adjoining property owners. We are opposed to the Taylor Hell roaring Project, as presented in this current environmental assessment and draft decision in regards to the trail system at this time, as listed above in our letter. We suggest a very simple solution, at this time. Leave the trail system out of your proposal.

Sincerely,
; Marilyn Bain

Dennis and Marilyn Bain

Please note our current mailing address is:

Dennis and Marilyn Bain



We can reached by phone at:



Taylor Hellroaring Project Objection, September 20, 2019

Exhibits

Exhibit #1 – Trail Management Activities, Appendix A: Details of Selected Alternative

Exhibit #2 – Taylor Hellroaring – Alternative 2, Proposed Trails, Appendix A, Map 2

Exhibit #3 – Taylor Hellroaring – Alternative 3, Proposed Trails, Appendix A, Map 3

Exhibit #4 – svc.mt.gov/msl/mtcadastral/layout.aspx?100

Exhibit #5 – svc.mt.gov/msl/mtcadastral/layour.aspx?80

Trail Management Activities

Table A-3. Information on trails included in the selected alternative, including information on type of trail, suggested trail class, managed use, and length. For information on trail class, please refer to Forest Service Handbook 2309.18 (USDA FS 2008). Either Trail 2 or Trail 3 would be built depending on access to private land. Both trails would not be built. The new trail construction total includes Trail 2, which is longer. Trail L6 would be closed to equestrian use south of Taylor Creek Road. Trail R1 would be closed to equestrian use from the intersection of L6 east toward Whitefish Mountain Resort. Trails M1, M2, M3, M4 and M5 would be located on existing open roads.

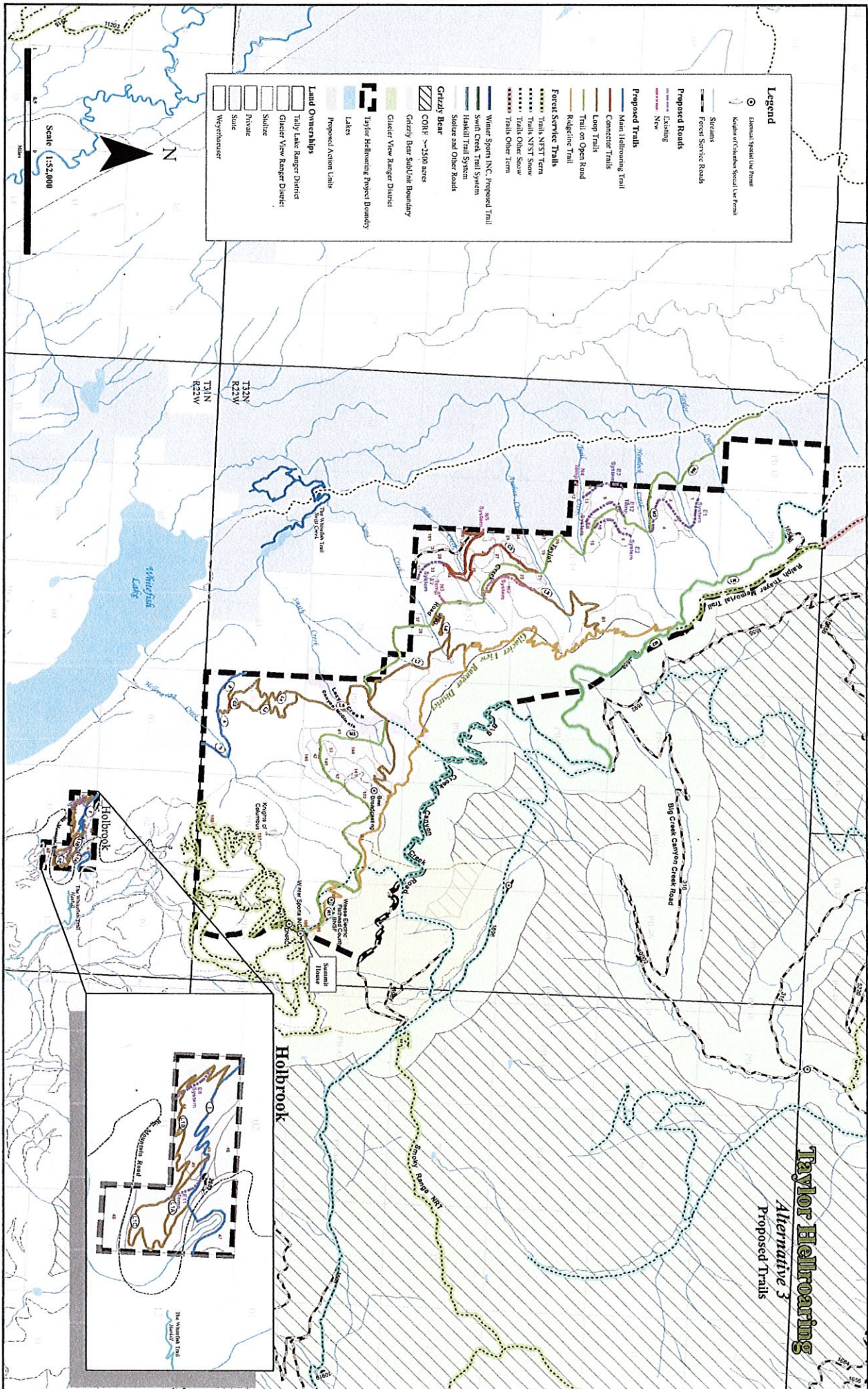
Trail	Location Description (precise location to be determined during layout)	Trail Class	Managed Use	Length (miles)
New trail construction (28.32 miles total)				
1	Whitefish Trail: Haskill Basin to Hellroaring	3/4	Pedestrians, Bicycles	1.06
2	Whitefish Trail: Alternate Whitefish Mountain Resort Access	3/4	Pedestrians, Bicycles	2.11
3	Whitefish Trail: Main Hellroaring Trail, South Access	3/4	Pedestrians, Bicycles	0.25
4	Whitefish Trail: Main Hellroaring Trail	3/4	Pedestrians, Bicycles	0.76
5	Whitefish Trail: Main Hellroaring Trail, West Access	3/4	Pedestrians, Bicycles	0.31
C2	Whitefish Face: Lower Loop Connector	2/3	Pedestrians, Bicycles	0.07
L1 A	Whitefish Face: Holbrook Entry Loop, ADA	4/5	Pedestrians, Bicycles	0.51
L1 B	Whitefish Face: Holbrook West Loop 1	3/4	Pedestrians, Bicycles	1.22
L1 C	Whitefish Face: Holbrook East Loop 2	3/4	Pedestrians, Bicycles	0.59
L3	Whitefish Face: Lower West 2 East Side	2/3	Pedestrians, Bicycles	1.46
L4	Whitefish Face: Lower West 1 West Side	2/3	Pedestrians, Bicycles	1.55
L5	Whitefish Face: West 1, East Side	2/3	Pedestrians, Bicycles	2.60
L6	Whitefish Face: West 2, West Side	2/3	Pedestrians, Bicycles, Equestrian	2.55
L7	Whitefish Face: West 3, East Side	2/3	Pedestrians, Bicycles, Equestrian	1.76
L8	Whitefish Face: West 4, West Side	2/3	Pedestrians, Bicycles, Equestrian	3.28
R1	Whitefish Face: Ridgeline	2/3	Pedestrians, Bicycles, Equestrian	8.24
Trails on currently open roads (14.85 miles total)				
M1	Werner Divide Road (NFS Road 1658) (Tally Lake Ranger District)	0	Trail co-located on existing open road	1.82
M2	Werner Divide Road (NFS Road 1658) (Glacier View Ranger District)	0	Trail co-located on existing open road	2.59

Trail	Location Description (precise location to be determined during layout)	Trail Class	Managed Use	Length (miles)
M3	Taylor Creek Road (NFS Road 9790)	0	Trail co-located on existing open road	2.39
M4	Taylor Creek Road (NFS Road 9790) on state land	0	Trail co-located on existing open road	1.50
M5	Whitefish Trail alternate, Taylor Creek Road (NFS Road 9790)	0	Trail co-located on existing open road	6.55

Appendix A, Map 2



Exhibit #3



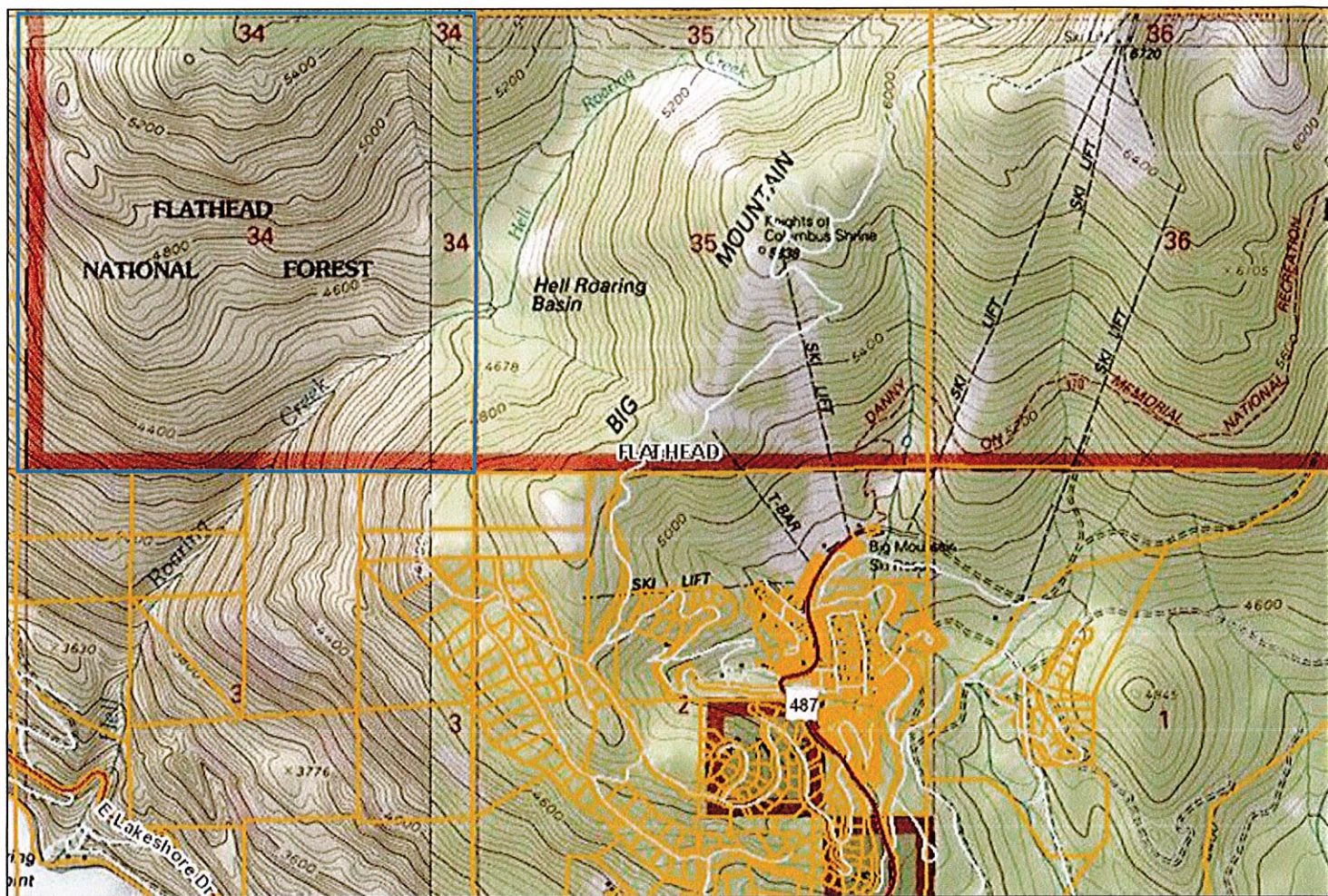


Exhibit #4



Exhibit #5