June 5, 2015

Objection Reviewing Officer

USDA Forest Service Northern Region

P.O. Box 7669

Missoula, MT 59807

Email: appeals-northern-regional-office@fs.fed.us

Re: Objections to the Draft Record of Decision for the Divide Travel Planning Area, Helena National Forest, April 2015.

Dear Reviewing Officer,

I am a member of CTVA and MTVRA and have previously commented individually on the Divide Travel Plan and through the CTVA club submittals during the comment periods. My input was not given a hard look by the Forest Service. Consequently the Forest Service is proposing to close too many roads and trails for the motorized public. In addition, I strongly feel that the Forest Service is ignoring the motorized access needs of senior citizens and disabled persons dependence upon and use of motorized vehicles in order for them to continue recreating on and enjoying our public lands. Public access means for all uses, not just the community that is still physically able to hike or can afford to own a horse or pay an outfitter for their services.

My objections are based on 45 years of recreating on the public lands within the Divide Travel Plan area throughout all seasons of the year and numerous hours doing so. While physically able I was a very avid hiker, horseman, motorcyclist, snowmobiler, fisherman and hunter. I was very successful harvesting my game animals each year because I spend a lot of time traversing the terrain and observing the ungulates, their habits and preferred habitat. I strongly feel that this experience has great merit for my comments and objections.

I’ve attended numerous public meetings on this plan and most of the other land management plans. At these meetings the government agencies provide maps and documents for those maps. What they have not provided is the actual studies that provides credit and support their decisions even though they have been asked to provide them. Lip service is not acceptable and it is high time that the studies are provided to the public before this process can proceed. Therefore, I want copies of these studies.

Objection #1: Opposed to motorized road closures on 8/31.

This is a social issue and therefore should not be part of travel planning. It has been put on the table because of the archery and rifle hunting seasons and therefore is negatively impacting the public that use public lands for non-hunting motorized recreation. Fall is some of the best time to enjoy the scenery as foliage is changing and there is less traffic on the trails. I’ve not seen any biological studies that justify this reduced time for motorized use. In addition, being a disabled person you are jeopardizing my safety by dis-allowing me to retrieve game animals via a motorized vehicle. In principle, if motorized vehicles cannot be used for whatever purpose during closed dates then horse travel should likewise be restricted not only on the closed trails but also in the general vicinity of say 1-2 square miles from the trails. Otherwise hunters using horses have an unfair hunting advantage over the rest of the hunting public.

Objection #2: Opposed to re-routing the CDST through Sally Ann Creek trail.

Reference information; Sally Ann Creek trail is identified as #1224 on a FS map dated 1977. There is not a trail identification number for it on alternative plan map #5. Alternative plan #2 map identifies it as trail #527-B1. I have a hard copy map that identifies the re-route beginning at Bryan road as J 031 and ending at its junction with the CDST by Jericho Mountain as J 032 (I don’t have an electronic file of this map).

The following is copied from my Divide Travel comment dated October 10, 2014; “At one of our previous CTVA meetings I stated that during June, July and August of 2013 I had game cameras in specific areas on the Continental Divide Trail #337 (I misquoted this, it is trail #1863) between Jericho Mountain and McDonald Pass that would record any traffic on the non-motorized section. During these 3 months no humans traversed the trail, get that; not one single person and less than 200 ungulates were observed! It is fiscal irresponsibly to spend scarce funds to rehabilitate this route ”simply for the sake of rerouting the CDST” especially with camera evidence that no humans (hikers, bikers or horsemen) used this trail not even once during 3 peak out door recreation months! There is numerous places where the CDST follows roads. Therefore the plan to close approximately 1.3 miles of the existing road to motorized travel for the rerouting makes no sense either. The area behind the closed gate on trail #1863-B1 is a prime example of what is not elk habitat. About ½ mile long by several blocks wide was clear cut years ago and is nothing but a bare and mostly rock ridge and no forage or trees have re-established over these many years.

I don’t know who did studies, or if there were any really done that certifies this area as elk security but whoever did has not spent much or extremely very little time analyzing the area. It has been extensively logged, several homes have been built right in prime elk grazing meadows, very steep ravines with a lot of dead fall, numerous rock slide areas and boulder fields and very poor forage except in some very limited areas. Rarely is there evidence of beds or grazing. The game cameras captured less than 200 ungulates in 3 months. If biologists had spent time in the area they would know that elk primarily use this area when crossing from Hahn Creek to the Ten Mile Creek drainage and beyond. They do not habituate this area and every year I observe fewer and fewer of them because of wolves moving into the area.

Objection #3: Opposed to the motorized closure of Ontario Creek Road #495-D1.

This is a wonderful loop route and is the preferred type of motorized trail by many riders and also reduces erosion because of not having to return the same way and reduces possible conflicts. The closure is based on concern of sediment from motorized crossing over 2 two small water crossings. I have recreated in this area for 45 years and can certify that there is no noticeable change to the landscape. Fifty inch bridges would reconcile the problem and clubs such as CTVA would be willing partners to maintain the route.

Objection #4: Opposed to temporary closure of Golden Anchor River crossing.

I see no logical reason for even a temporary closure of this crossing while the bridge is being constructed. History of these types of “temporary closures” often result in longer closure times than specified and worse yet often are a prelude to permanent closure.

Objection #5: Opposed to motorized closure of Kading Trail # MTR-502, 503 and 504.

It is my understanding that this closure is being initiated due to sediment concern from the water ponds on trail 227-E1. This situation can be alleviated by installing water bars which is approved trail maintenance according to several Forest Service policies. From the perspective of OHV visitors the Kading Grade represents the high quality OHV route system that the travel management plan is meant to preserve. Closing it would be contrary to the goals of preserving and developing a high quality OHV route system. The Kading Grade is part of a significant ATV loop (MTR-502 to MTR-503 to MTR-504) that connects back to the Kading Cabin trail and other routes in the area. The Kading Grade is just the sort of high quality OHV route that the public enjoys with both challenge, scenery, and looped opportunity.

Objection #5: Opposed to the 30 & 70 off road rule.

This is far too constrictive and will immensely diminish the quality of family outdoor recreation not to mention other activities such as fire wood cutting. Imagine having a picnic within 30 feet of the Telegraph Road with food exposed and the dust from vehicles traveling the road. Are these really a logical policies, I think not.

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