

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)

**P.O. Box 5295
Helena, MT 59604-5295**

September 24, 2025

Butte Ranger District
Attn: Timothy Lahey
1820 Meadowlark Lane
Butte, MT 59701
<https://www.fs.usda.gov/project/?project=68735>

Re: Whitetail-State Creek Project #68735

Dear Project Team,

We have assembled the following comments, information and issues from our members and other Motorized Multiple-Use recreationists for the project record. We appreciate the opportunity to provide our comments for the Whitetail-State Creek Project. We enjoy riding our OHVs on primitive trails and roads in our public lands. All multiple-use land managed by the Beaverhead-Deer Lodge National Forest including the Whitetail-State Creek Project area provides a significant source of these Motorized Multiple-use recreational opportunities. Moreover, the pandemic has reconnected visitors to our public lands as a critical way to counter the stresses of ever day life. Ninety-eight percent of these visitors are looking for Motorized Multiple-Use activities including OHV recreation. We are passionate about OHV recreation for the following reasons:

Enjoyment and Rewards of OHV Recreation

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in a healthy and enjoyable sport.
- Opportunity for relief from the pandemic and stress.
- Opportunity to experience a variety of opportunities and challenges.
- Camaraderie and exchange of experiences.
- We like to build and maintain trails for use by everyone.
- We enjoy observing flora, fauna, and landscapes.
- For the adventure and “flow” of it.

Acknowledged Responsibilities of Motorized Visitors

- 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.
- Responsibility to respect all visitors by sharing and coexisting.
- Responsibility to use vehicles in a proper manner and in designated places.

We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.

- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

Motorized Multiple-Use recreation represents and supports many different visitors' interests. Supporting Motorized Multiple-Use recreation is the best way to support diversity of uses and multiple-use. This over-arching need should be adequately addressed by the purpose and need for the project and adequately considered in the analysis and decision. We are representative of the needs of most visitors who recreate in the project area but may not be organized with a collective voice to comment on their needs during the public input process. These independent Motorized Multiple-Use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching and grazing, 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.

Motorized Multiple-Use also provides for the needs of physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. These Motorized Multiple-Use visitors use existing roads and motorized trails in the project area for their recreational purposes. We have observed and documented that 98% of the visitors to the project area are represented by the activities discussed above (24 years of observation data). Ninety-eight percent of the visitors are there to enjoy activities associated with motorized access and Motorized Multiple Use recreation.

We ask for adequate consideration of the following significant issues and needs associated with Motorized Multiple-Use recreation in the project area:

1. We define multiple-use as Motorized Multiple-Use.
2. The Whitetail-State Creek Project area is exceptionally popular with motorized recreationists from the Bozeman, Boulder, Helena, Butte, and Whitehall areas. These recreationists enjoy all of the activities outlined above. We have been recording visitor observations since 1999 and this area has the second highest number of daily observations behind the Homestake-Pipestone area.
 - a. The Whitetail-State Creek Project is popular with OHV recreationists because of the primitive conditions of most routes which provides a highly sought-after recreation experience for 4x4, SxS, ATV and motorcycle enthusiasts.
 - b. All of the existing motorized routes in the project area including the Galena Gulch, Upper Whitetail Creek and Hay Canyon areas provide extremely valuable recreational opportunities and should not be disturbed by the project.
 - c. The number of motorized recreationists visiting the project area has a significant positive economic impact on the Town of Boulder.
 - d. Given the high quality of the current motorized recreation experience in the project area, we are concerned about the possibility of a lesser quality of motorized recreation experience after the project.

3. We ask that the project not disrupt any existing motorized routes as documented in the BDNF Forest Plan alternative 6 modified and shown on the attached map during and after the project completion (electronic copy available upon request).
 - a. We have found that Alternative 6 modified mapping is not completely accurate. All motorized routes that currently exist on the ground should not be impacted by the Whitetail-State Creek Project.
 - b. A map of popular OHV routes in the project area (does not include all) is attached. An electronic copy is available upon request.
4. All connections to adjacent motorized routes on land managed by the BLM should be maintained.
5. The quality of existing motorized recreation experience in the project area has been negatively impacted by several recent wildfires including State Creek, Haystack, and Ratio Mountain fires. Therefore, additional negative impact should be limited.
6. Since the pandemic, campsites are in short supply and extremely valuable to the public. We ask that the project not disrupt any existing dispersed camp sites in the project area.
7. We are concerned that the Whitetail-State Creek Project could impact the safety of OHV recreationists, campers, children and pets by the activity of logging equipment and trucks in the project area.
8. The following table is supported by information from the Montana Environmental Quality Council (EQC) which shows that, accounting for roads that have been decommissioned along with roads considered “unauthorized,” the mileage of road closures on U.S. Forest Service (USFS) land in Montana balloons to 21,951 miles.
 - a. A study (<https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf>) commissioned by the state legislature in 2015 and reported to the EQC found that 9,784 — or nearly 31 percent — of the nearly 32,000 miles of roads in Montana managed by the USFS were “level 1 roads,” meaning they are closed to motorized traffic and only open for “administrative use.”
 - b. However, the 32,000 total miles of roads does not include the 5,796 miles of officially decommissioned roads or the estimated 6,191 miles of “unauthorized” roads.
 - c. Counting the decommissioned and unauthorized roads in the total, would equal almost 44,000 miles of open and closed roads in Montana and 21,951 miles of those roads on USFS managed land are CLOSED.
 - d. The report states that there are 22,047 miles of roads open to motorized traffic. By this measure, 50% of the road mileage under the control of the USFS is CLOSED.
 - e. Based on our observations, a similar percentage of motorized trails have been closed.
 - f. A similar percentage of roads on BLM managed lands have been closed. Note that the BLM rarely identifies and discloses motorized trails.

- g. The public does not want any more motorized closures under the proposed action and the cumulative effects of all past motorized closures must be adequately considered and mitigated.
- h. The cumulative effect of all motorized closures is significant and can no longer be ignored.
- i. The limited number of existing OHV opportunities in western Montana are overcrowded. The project area is popular because there are so few OHV opportunities available. Therefore, recreationists currently visiting the Whitetail-State Creek area have very few recreation opportunities to replace any temporary or long-term loss of the Whitetail-State Creek Project area and would be significantly impacted by any temporary or long-term loss of use.
- j. The following table presents a partial list of Current and Immediate Past Actions With Significant Cumulative Impact on Multiple-Use/Motorized Recreation.

Table of Cumulative Effects on Motorized Recreationists								
Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Iron Mask, Butte BLM	26,235	19.3	0.6	18.7	96.89%	No	BLM	2015
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000						FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000						FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000						FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700						FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Butte RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009
Helena area		52.2	9.8	42.5	81.42%	No		
Blackfoot TP	376,000	***	*	*	over 50%	No	FS	2017
Divide TP	155,000	***	*	*	over 50%	No	FS	2016
Custer NF Beartooth TP	580,000						FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP and Forest Plan	437,000	**	??	??	??	No	FS	Ongoing
Custer NF Sioux TP and Forest Plan	436,000	**	??	??	??	No	FS	Ongoing
Bitterroot NF TP	1,589,000	**	*	*	over 75%	No	FS	2015
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000						FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000						FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000						FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**	**	**	**	No	FS	Ongoing
Lolo Forest Plan	2,083,000	**	**	**	**	No	FS	Ongoing
WMPZ Forest Plan	6,043,000	**	**	**	**	No	FS	Ongoing
Subtotal	50,494,925	39,413.3	28,343.3	11,068.7	28.08%	No		
Other Significant Measures of Closed Motorized Opportunities								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
All completed, ongoing and reasonably foreseeable FS Travel Plans	192,300,000	192,300,000	??	??	??	No	FS	
All completed, ongoing and reasonably foreseeable BLM RMP and Travel Plans	258,000,000	258,000,000	??	??	??	No	BLM	
Notes:								
* estimated impact, Inadequate public disclosure by a public agency, public does not have access to the overall data								
** underway with expected significant impact								
*** additional impact associated with significant loss of quality trails and substitution with roads								
**** number of snow machines								
***** All motorized trails closed								
Needs to be identified and tabulated and disclosed by the agencies per NEPA disclosure requirements, ?? actual cumulative effect of all closures is greater than 11,068 miles and 28.08% when full disclosure is made.								

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9. As demonstrated in item 8 above motorized recreationists have been squeezed into the smallest possible set of recreation opportunities over the past 30 years. Areas such as the Whitetail-State Creek Project area with a reasonable network of motorized routes and dispersed camp opportunities are extremely valuable recreation resources.
10. Recreation opportunities are important because they enhance individual health by improving physical fitness, mental well-being, and stress reduction, while also building social connections and fostering personal growth through skill development. Communities benefit from recreation through increased social cohesion, a reduced burden on healthcare systems, and the creation of positive environments that reduce crime and support environmental stewardship. Access to diverse motorized multiple-use activities promotes a balanced, more fulfilling life for people of all ages.
11. President Trump has directed federal agencies to increase recreation.
 - a. President Trump established the "President's Make America Beautiful Again Commission" through a separate executive order on July 3, 2025. This commission, chaired by the Secretary of the Interior, is tasked with:
 - b. Expanding access to public lands and waters for various recreational activities like hunting, fishing, hiking, biking, skiing, climbing, boating, off-roading, and wildlife viewing.
 - i. Incentivizing voluntary conservation efforts.
 - ii. Promoting active forest management and responsible stewardship of public lands.
 - iii. These actions build on earlier efforts during the Trump administration, such as the Great American Outdoors Act, signed into law on August 4, 2020, according to Indian Affairs (.gov). This act provided significant funding for maintenance backlogs in national parks and public lands and permanently funded the Land and Water Conservation Fund.
 - c. <https://www.whitehouse.gov/presidential-actions/2025/07/establishing-the-presidents-make-america-beautiful-again-commission/>
 - d. <https://www.whitehouse.gov/presidential-actions/2025/07/making-america-beautiful-again-by-improving-our-national-parks/>
12. Wherever possible, we ask that the Whitetail-State Creek Project protect and enhance current motorized recreation opportunities as mitigation for significant negative cumulative impacts that all motorized closures in Montana have had on the public.
 - a. Existing routes should be protected and/or restored to OHV/high clearance 4WD standards following the project.
 - b. Existing dispersed campsites should be protected from project activity and include a buffer zone.
 - c. Enhancements could include curvilinear treatment of routes to provide a rewarding experience and control speed, drainage swales/rolling dips to control runoff and speed, development of short connectors to create loop opportunities, spurs to

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interesting destinations and erosion control improvements to provide a longlasting recreation resource.

13. With adequate consideration of our comments and issues CTVA and other motorized recreationists would be willing to partner with the Forest Service on the Whitetail-State Creek Project and work towards an outcome that meets the needs and goals of motorized recreationists and the vegetation project.

Summary:

- A. The Whitetail-State Creek Project area has become a very popular area for motorized recreationists and dispersed camping.
- B. Motorized Multiple-Use recreation and dispersed camping opportunities provided by the Whitetail-State Creek Project area are in short supply.
- C. Existing opportunities in the project area could be impacted by changing existing primitive routes to improved haul routes and destruction of valuable dispersed campsites by timber harvest activities.
- D. The Motorized Multiple-Use recreation assets in the project area need to be protected and perpetuated by the project.

We look forward to your consideration of these significant issues and comments. We would greatly appreciate your use of our comments to protect and enhance motorized recreation in the Whitetail-State Creek Project area.

CTVA and other motorized recreationists also look forward to working with the Forest Service to ensure that motorized recreation and dispersed camping are not impacted by the proposed project and enhanced wherever reasonable.

Thank you.

Sincerely,

/s/ CTVA Action Committee on behalf of our members, families, friends and social media groups
Capital Trail Vehicle Association (CTVA)
P.O. Box 5295
Helena, MT 59604-5295
e-mail: CTVA_Action@charter.net

Contacts:

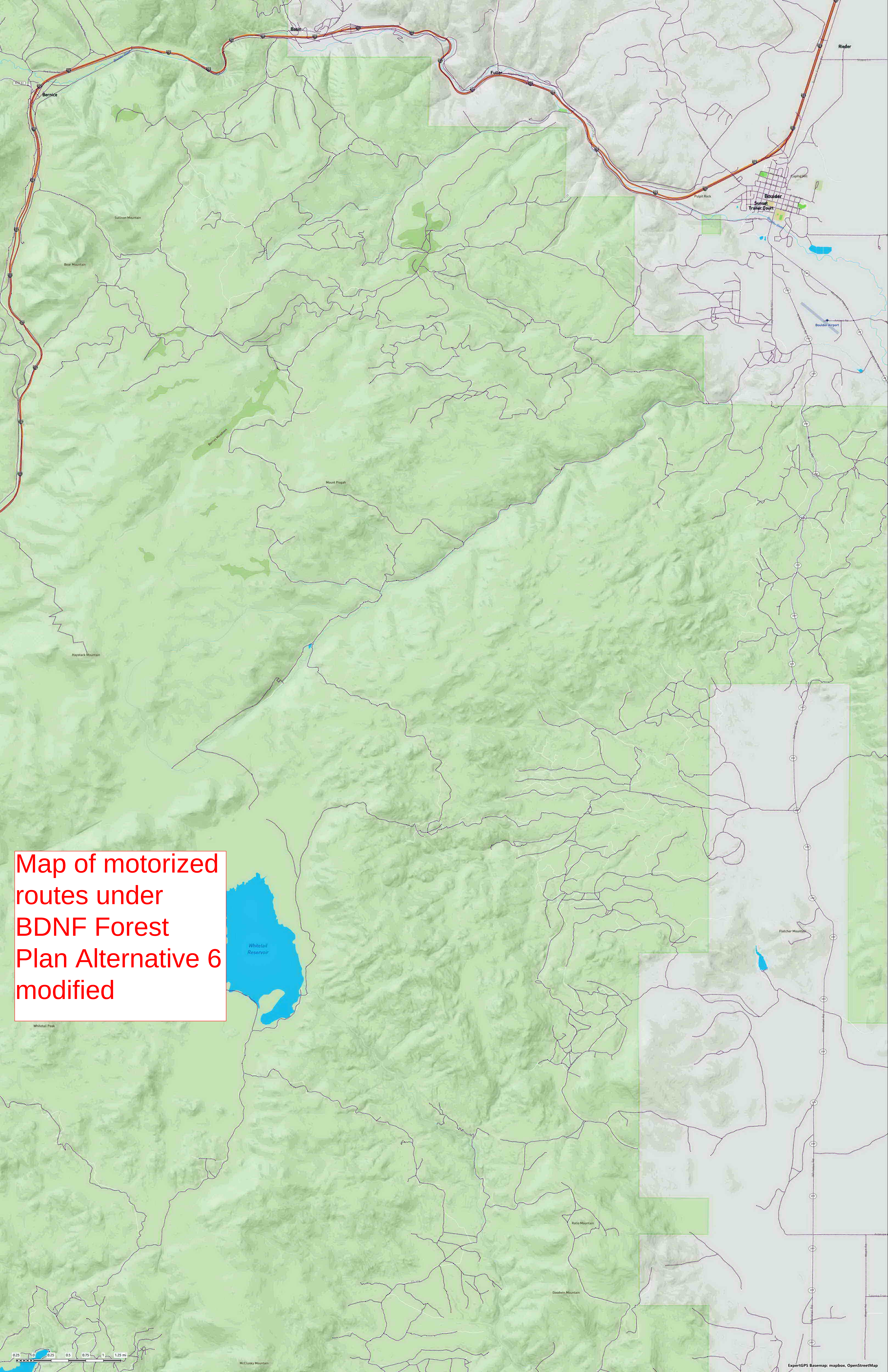
Gary Peterson, President
Jody Loomis, VP
Jim Dundas, Social Media
Ken Salo, Recreation Development

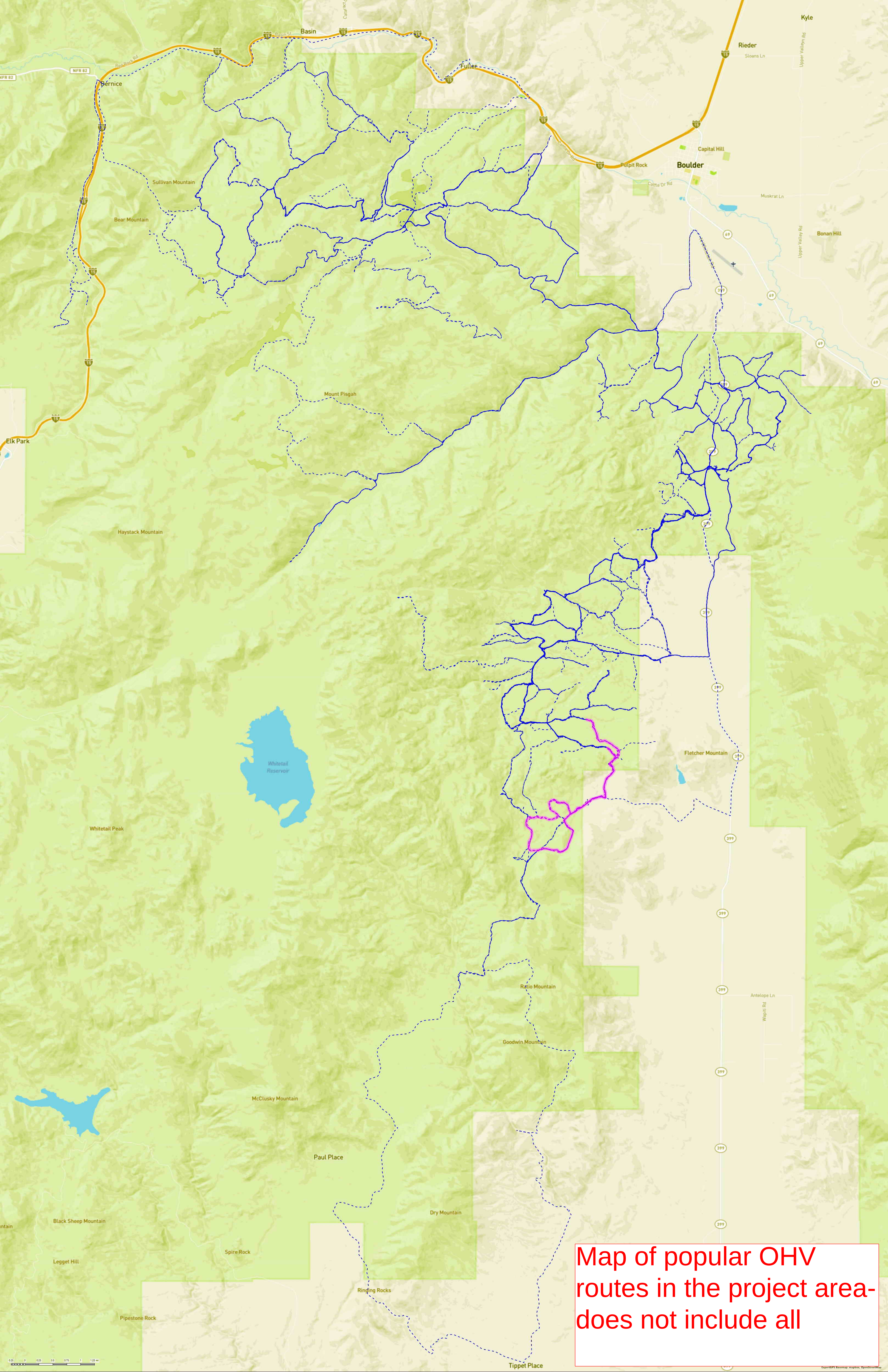
Attachments:

Map of motorized routes under BDNF Forest Plan Alternative 6 modified
Map of popular OHV routes in the project area-does not include all

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Map of motorized routes under BDNF Forest Plan Alternative 6 modified





Map of popular OHV routes in the project area- does not include all