

Northwood Alliance
6063 Baker Lake Rd
Conover, WI 54519
715 479 8528

October 12, 2010

USDA Forest Service
Supervisors Office
E6248 US Highway 2
Ironwood, MI 49938

Dear Ms Spear:

The Northwood Alliance Inc. is a non-profit, member orientated, conservation organization concerned about the regions forests, water and the public's quality of life. Members have continued to express concern to our directors regarding the OHV connector proposal.

The Northwood Alliance disagrees with many of the findings and is hereby submitting these comments on the Off-Highway Vehicle (OHV) Connector Route Project Revised Environmental Assessment dated September 13, 2010.

By identifying Alternative 3 as the preferred alternative, we believe our prior comments and the issues raised during our appeal were not given serious consideration or fully evaluated when analyzing the various alternatives.

The ONF currently offers approximately 2400 miles of OHV access and as stated on Page 13 of the Revised EA, all action alternatives would offer more access than currently exists. However, we disagree that opening more trails meets the goal of "striving to maintain the remote character of the Ottawa." We remain concerned with the impact the routes outlined in the action alternatives will have on our natural resources, especially considering the funding challenges facing the Ottawa, the inability to control unauthorized use of ATVs and the management/control of non native invasive species.

Some of our concerns are discussed in the December 2008 US Forest Service Publication "Effects of All Terrain Vehicles on Forested lands and Grasslands, December 2008". The study's three main questions were: Are natural resources being affected by ATV use; to what degree are natural resources being affected; and does the ATV's design make a difference in the effects? On Page 83 it states, "In short, this study concludes that ATV traffic can adversely affect natural resources and the way the vehicle is equipped does not make a statistically significant difference. The study further concludes that—of the vehicles tested—all ATVs contribute to the effects regardless of type and equipment. Page 84

states, "The study also suggests that limiting ATV traffic to trails is not enough to protect the natural resources."

http://www.fs.fed.us/rm/pubs_other/rmrs_2008_meadows_d001.pdf

The Forest Plan (Page 2-15) states, "Designation of OLM 1, 2 and 3 roads is considered where conflicts with other user needs and resource protection issues are minimal." The plan further states, "Provide connections to existing designated public roads and trails" later further defined in the FEIS as the designated north/south connectors.

The FEIS (Page 3-197) clearly states, "Connections to State of Michigan east/west, multi use trails *would* be provided for with the north/south connectors utilizing a combination of OLM 1, 2 or 3 roads. The new designated north/south connectors would provide approximately 25-75 miles of access and would give OHV users opportunities and improved access to essential services and recreational destination points (gas, food, and lodging)." We believe only the north/south connectors are authorized under the current Forest Plan and FEIS; local connectors are not and to include them would require a plan amendment.

We support the designation of two north/south connector routes, and only the two connector routes, providing these routes do not traverse MA 6.1 areas and the USFS has a plan in place to counter unauthorized use.

We do not agree with the conclusion reached (Page 21) that, "An increase in miles of OHV access would reduce potential unauthorized use since the proposed OHV routes provide for a riding experience that might otherwise be fulfilled by riding on routes closed to OHV use." Travel most any back road that is currently open to OHV use and you will find where someone traveled off that trail. There are even unauthorized trails in areas where ATV use is prohibited such as Silver Mountain and Sturgeon River Gorge. It is illogical to conclude opening more roads will reduce unauthorized use.

Page 4 of the Revised EA states, "Off Highway use on the Ottawa has changed dramatically over the years from a primary means of access during hunting seasons to the use of OHV's for recreational riding all seasons." While this statement may be true it is irrelevant. The current Forest Plan does not purport that the recreational riding of OHVs should take place during all seasons, nor does it authorize the creation of loop connector routes and other new OHV routes to accommodate such use.

Page 17 (Unauthorized OHV Travel) implies deer hunting season is the only high recreational use period by stating, "Informational efforts have included public media announcements, public meetings, signing roads and trails, and making public contact during high recreational use periods, specifically during the deer hunting seasons (USDA 2008 (b))."

There are other periods of high use besides deer hunting season, namely bear hunting and baiting season. Beginning August 10, each person can tend up to 12 bear bait stations each containing up to 2 gallons of grain plus unlimited amounts of meat/meat products, fish, and bakery products etc. Most of these individuals access their bait stations using ATV's. They maintain far more bait stations over a longer period of time and can cause considerable resource damage.

The Revised EA does not adequately address unauthorized use; the analysis in the Revised EA is seriously deficient and mostly based on speculation. We believe the FS grossly understates the enforcement issue. The FS acknowledges on Page 7, "Since implementation of the MVUM has been on-going for only four years, more information is needed to evaluate the monitoring data collected and determine trends." Also on Page 7 of the Revised EA it states, "There has been evidence that some unauthorized use is occurring; increased patrols have been performed in areas of known violations, which in concert appeared to reduce violations in some cases (2009 M & E Report). However, there is no data to support the statement. Instead, the FS admits in that same document, "It is difficult to say how effective trail and road closures are..."; "There is evidence (tracks around or over barriers) of some unauthorized motor vehicle use in many areas across the Ottawa; "Increased patrols have been performed in areas of known violations, but this effort produced little contact with violators" yet illogically concludes these actions "appeared to reduce violations in some cases."

The inability to manage unauthorized OHV use, for whatever reasons, is exemplified by the few citations issued during Fiscal Years 2009 and 2010. Records show only 16 Incident Reports and 3 Violation notices were issued in 2009; while 21 Incident Reports and 2 Violation notices were issued in 2010.

Policies to prevent resource damage by ORVs are only as good as the agency's enforcement mechanism. The FS simply does not have the funding or personnel to monitor and/or enforce unauthorized OHV use of the roads that currently exist; adding more than the two north/south connectors would only add to the problems with unauthorized use and we therefore cannot support opening additional roads/trails. We also believe the FS must outline detailed plans as to how the Ottawa plans to monitor use of the newly-created north/south connectors to insure there is no unauthorized use.

Table 1 (Page 17) compares recreational activities between 2003 & 2007 and displays the top five recreational activities on the Ottawa and reflects major increases for viewing scenery, wildlife, fishing, hiking, walking and relaxing. We question the assessment of noise disturbance that would occur if the proposed routes were implemented (page 25). A 1975 study determined "no more than 5% of the vehicles on an off-road vehicle track would be detected at distances equal to or greater than 0.5 miles from the track." We

challenge this statement. As noted, there are many variables that can affect sound levels. OHVs can easily be heard a mile or more away with the right conditions.

A person visiting an amusement park expects to hear loud noises, but for the person who visits the Ottawa seeking solitude, it is unacceptable to hear even 5% of the vehicles. We strongly disagree with the conclusion reached on page 26 of the Revised EA that the noise of ATVs will have minimal impact on non-motorized user's recreational experiences, especially considering OHV use is expected to increase over the years.

Forest Road 630 Local Connector (Route E) has been identified as a route that crosses two streams, including the perennially flowing Cranberry River and an un-named intermittently flowing tributary to the Cranberry River which also crosses or is adjacent to six wetlands (Revised EA Page 39). The route is partially within the semi-primitive non-motorized area & would lead to the community of White Pine. We oppose this route for several reasons.

OHV traffic is currently allowed on the Powerline Road, where improvements have recently been made to the Cranberry River road/stream crossing (Revised EA Page 40). This road is not within MA 6.1, riders on the Pioneer Trail can connect to Powerline Rd via Norwich Road and Powerline Rd also leads to the community of White Pine.

It also states on Page 40 that this road is currently not suitable for sustaining OHV traffic over the long-term. However, there is no mention of closing Powerline Rd if Route E is to be opened to OHV traffic. It appears the intent is to maintain both routes.

We previously quoted Page 3-193 of the FEIS in our earlier comments and in our appeal, but believe it must be stressed again. This section states, "New designated motorized trails would not be developed in management areas that have semi-primitive non-motorized objectives. A portion of the Pioneer Multi-use trail currently traverses MA 6.1. There is a long-term desired condition to move this trail outside MA 6.1. No additional new motorized trails or routes would be permitted in MA 6.1. No local level roads would be designated for OHV use in SPNM areas and generally OLM 3 roads would not be designated for OHV use in these areas."

One of the Objectives of the Forest Plan (Page 2-4) is to "Maintain or increase opportunities for quiet and remote experiences in semi-primitive non-motorized areas and other areas as appropriate." Page 32 of the 2009 M & E Report further states, "Recreation Opportunity Spectrum Objectives for MA 6.1 – *maintain or increase opportunities for quiet and remote experiences in semi-primitive non-motorized areas* – are not fully being met, largely because when we approved the Forest Plan there were miles of OLM 1 and OLM 2 roads that had historic use by snowmobiles, OHV's and passenger vehicles. Going forward, the Forest should continue to seek opportunities to close those roads and trails to motorized use, as per MA 6.1 direction..."

The FS cannot choose to ignore the intent of MA 6.1 designation. The Revised EA, Page 27, states that because the route is currently open to highway legal vehicles, the change to allow all motor vehicle travel on Route E is minor in scope and would not result in a significant change to the Forest Plan's Objective for maintaining or increasing opportunities for quiet and remote experiences in the SPNM area. We strongly disagree with this conclusion. Allowing a motorized trail within MA 6.1 is inconsistent with the Forest Plan.

36 C.F.R. §219.21(g) requires that off-road vehicle use shall be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the National Forest System lands. With only 6% of the Forest classified as "Semi-Primitive Non-Motorized" we believe the FS should actively pursue the rerouting of the Pioneer Trail and closure of roads and trails to motorized use within MA 6.1 - not open more.

The Forest Plan (Page 2-4) states as an objective to "Limit the spread of non-native invasive species, focusing on areas where these species have high potential for establishment and spread or for serious environmental effects."

In the document "Assessing the ecological impacts of ATV Trail construction and use on public lands: factors to consider and a review of the literature", prepared by and for the Environmental Review program Ecological Services Division, Minnesota DNR. Page 7 states, "Severity of impacts to fisheries, wildlife and native plant communities is fundamentally and directly related to levels of traffic on trails. The higher the traffic level, the greater the impact severity." Page 12 of that same document states, "ATV Trails and other such linear facilities enhance the spread of exotic species. This happens in two ways: By carrying seeds of exotic species on machines and by changing habitats and soil conditions in ways that favor invasion of exotic species."

<http://friendscvsf.org/AssessingATVimpacts-pdf.pdf>

Another set of studies documented in the report "Seed Dispersal by Vehicles" by Dr. Lisa Rew and Fredric Pollnac, focused on consumer four wheel ATVs. ATVs were driven set distances in off-trail and on-trail settings. Dr. Rew's team found that, within their study area, ATVs picked up approximately 15 times more seeds off-trail than on-trail in the fall, and approximately 80 times more seeds off-trail than on-trail in early summer. During this study, they saw that ATVs were capable of picking up as many as 200,000 seeds over 48 miles of travel (about 4200 seeds per mile), out of which roughly 750 were from noxious weeds.

http://weedeco.msu.montana.edu/rangewildland/Seed_dispersal/CIPM_Seed%20Dispersal%20by%20Vehicles.pdf

The FS acknowledges these threats on Page 49 of the Revised EA where it states, "Adding the proposed eight connector routes would contribute to the spread of non-native invasive plants along the routes and into adjacent roads and natural areas, as disclosed by the Forest Plan's FEIS." The FS has policy documents to guide monitoring and treatments; Alternative 1 would strengthen efforts to reduce the spread of invasive species on the Ottawa.

Another issue that has been largely ignored has been the lack of funding for maintenance of the current trails and any proposed trails. Several pictures are attached taken on a forest road open to both street vehicles and ATVs. With each rain, the mud holes get larger and deeper and forest resources are damaged. Unfortunately, this is not an isolated case. Volunteer organizations have completed many repairs within the Ottawa; however, with increase use, heavy clay soils and the current number of roads, the job is overwhelming.

The scope of this EA was limited to OHV travel but some attendees at the public meeting held in Watersmeet, 10/05/10, argued that snowmobile travel should be allowed on any of the proposed connector routes where snowmobiles are not currently allowed. We recognize that to open trails to snowmobiles would involve a new process. We would like the record to show we do not support this concept.

The Revised EA still does not have a "reasonable range of alternatives", as required by NEPA. We believe there should have been an alternative that addressed the major issues contained in the two appeals filed as well as the Regional Forester's decision. Alternative 4 only addressed one of the many issues raised. Therefore, we believe the range of alternatives is still lacking, and not in compliance with NEPA.

Alternatives 2, 3 and 4 of the Revised EA each pose risks to wetland, stream crossings, surface disturbance, non-native invasive species, sedimentation, dust, erosion and unauthorized access. Therefore, at this time, Northwood Alliance Inc. can only support Alternative 1.

Thank you for the opportunity to comment on the OHV Revised EA.

Sincerely,

Nancy Warren, Secretary

Nancy Warren
Northwood Alliance





