Re: Huron Manistee National Forest Savanna Ecosystem Restoration Project

Great Lakes Four Wheel Drive Association Comments to USFS Scoping Letter

January 8, 2010

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On behalf of the Great Lakes Four Wheel Drive Association Land Use Committee, (glfwda.org), I am submitting these comments in response to the Huron Manistee National Forest Savanna Ecosystem Restoration Project Scoping Letter.

Timing of Project

Projects involving the transportation system and recreational roads should never be released for scoping at any time other than the summer months. Winter snow obscures the road system and adjacent areas making it impossible to gather meaningful and accurate data.

The majority of users of these areas do so in the summer. People that camp and/or fish in or from dispersed camp sites along the roads proposed for closure and even those that remain open also have a right to comment on this project during the scoping stage. Unless they have a general interest in land use issues, they will have no clue what is going on here. Very few campers or day users read SOPAs but everyone that camps or uses the area in any way will be interested and hold a valid opinion on this project.

Misrepresentation of Project in SOPA

The SOPA project purpose is stated merely as “Wildlife, Fish, Rare plants and Forest products”. There is no mention of road and campsite closure that is evident in the Scoping Letter.

The SOPA description identifies a mere 3,000 acres, yet the Savanna Ecosystem Restoration Project Public Scoping Letter, Project Area Description states, “the project area consists of approximately 26,000 acres”. We would argue that this project in its entirety was predetermined with malicious intent to become reality with little to no opposition. The variance in description is intentionally misleading and defies the rules governing the FOIA.

Finally, there is no web link in the SOPA to see an on-line project description.
Incomplete and Vague Maps

KBB dispersal corridors for proposed savanna areas can be envisioned with the current project map but actual in situ dispersal corridors and overall KBB habitat area cannot be determined because the project map does not include existing suitable area boundaries, either on Federal or private land. Because of this, no informed judgment can be made by the public whether the proposed actions are insufficient, adequate, or vastly overbearing. Nor does the map show spatial temporal morphology of habitat creation and succession.

Request Postponement of Scoping Period

Because of what we believe to be poor timing of the scoping, misrepresentation in the SOPA, and incomplete maps, we request that you postpone or extend the Scoping of this project until late summer of 2010 so a much larger percentage of the interested parties can be identified and notified of the project and their need to comment. This will also allow us and others to view on site resource conditions and use patterns to better suggest modifications to the existing proposal that will protect both the KBB and public access to public land.

Wildlife Habitat and Roads

While resource damage by ORVs is mentioned in the USFWS Karner Blue Butterfly Recovery Plan, it primarily refers to illegal cross country use and subsequent damage to Lupine stands. We see no reference to any threat caused by the vast majority of users in slow moving full size ORVs and other cars and trucks on existing roads. Proximity to roads as a threat to the KBB is also seemingly without substantial merit because much of the proposed savanna creation is adjacent to county roads with much higher speeds.

The land area of the roads is miniscule compared to the potential total area of proposed savanna creation. The land area therefore cannot be seen as being needed for lupine growth.

Closing roads will not reduce illegal ATV use because they can go around or over all barriers. In fact, it will increase illegal use due to more public roads being deemed illegal by one government agency, while the general population still desires to use those roads.

Further reductions in vehicle/KBB interactions may be realized by the following:

Keep dispersal corridors away from existing roads by providing wooded buffer zones along roads to deter dispersion along that road opening. This will also be more visually appealing to those that recreate along the roads. Lupine does not reproduce in dense shade. Therefore, if a dense, close canopied buffer zone exists along existing forest and county roads, Lupine is less likely to grow there. We realize much of the area is already open, but the denser areas can utilize this method.

Dispersal corridors that need to cross roads can and should be located in relatively tight, twisty, slow velocity sections of routes which will greatly reduce vehicular interference with the KBB. By the way, these types of roads are preferred by the slower moving, full size ORVs which provide very little threat to the KBB.

Buffer zones acting as a corridor edge or maybe even a dispersal barrier, should also be deep enough and shady enough to not support thermoregulation immediately adjacent to and on the road to minimize KBB/vehicle interaction. These buffer zones can also serve to increase
overall edge density at both the subpopulation and metapopulation levels. Increased edge density is desirable for thermoregulation and oviposition.

Heavily wooded buffer zones along roads will also help deter illegal cross country traffic. Where the road intersects sparsely wooded areas or grassland, barriers can be installed along the roads to keep the uneducated or uncaring rider on the road.

Recreation and Resource Issues in the Semi-Primitive Non Motorized Management Area 6.1

The detrimental impact to recreation in the area will be huge if the roads are allowed to be closed. Those of us who are not hikers or equestrians are essentially barred from using this public land. The designation of semi-primitive areas historically used by mechanized traffic involuntarily reduces the diversity of public recreation opportunities in the area. The overall number of people that utilize and enjoy this area will, by these proposed actions, be substantially reduced.

If the proposed project continues as currently planned, many people will never be able to experience the history and scenic vistas along these sections of the river. Any proposed hiking path of more than 5 miles in length will preclude all but experienced, physically fit hikers from enjoying this area. How does this fit with ADA goals of providing more access for those with physical challenges, or our aging population?

There are better areas to use for non-motorized primitive use than an area littered with county roads and highly popular Forest Roads. The original concept of a Semi-Primitive Area is to find areas with low road densities and give them this designation, not systematically close roads in an area popular to motorized use to create an area with few "official" roads remaining. Closing all Forest Roads in an area to reduce road density and artificially create a Semi-Primitive area is inconsistent with the needs of the public that are increasingly utilizing motorized recreation.

Closure of these traditional pathways could lead to an increase in illegal ORV activity which could put the KBB at even greater risk.

Road closure and the resultant reduction in the number of people in the area will reduce the chance of detecting and reporting unintentional fires while they're still small and easily controlled. Because of increased fire risk, hikers are also put at greater risk due to spotty and weak cell phone coverage and the lack of efficient means of egress.

The reduction in public use will also make the area more attractive for illegal dumping, marijuana cultivation, and Meth labs. If a Meth lab is set up in the area, any remaining hikers or equestrians could face a potentially deadly encounter with criminals protecting their secrets.

If the proposed closure of these roads occurs, the resultant decrease in road density will shift traffic from low speed Forest Roads to the better-maintained, open canopied, higher-speed county roads putting the KBB at greater risk from vehicular impact.

With the economy of Michigan is such bad shape, tourism is a necessary component of Michigan’s financial recovery. The (re)opening of new camping areas along the White River would be financially rewarding for Michigan tourism.

In the Manistee National Forest the White River area is allocated to Management Area (MA) 6.1, Semi-Primitive Non-Motorized (SPNM). Forest Plan at III-6.1-3, Table III-8. The desired future
condition, in relevant part, is to emphasize nonmotorized use. Forest Plan at III-6.1-4. The desired future condition for this area is not practicable it is currently utilized heavily by motorized recreation. The Forest Service estimates that nearly 1.5 million residents participate in OHV recreation in Michigan. Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE), June, 2005. H. Ken Cordell at page 15. Table 6. It is arbitrary and capricious for the agency to attempt to mold these areas into a nonmotorized desired future condition when failing to consider the current OHV demand, future demand, and the current situation of these areas utilized heavily by motorized recreation.

In 2006 the Michigan Department of Natural Resources prepared a letter that was sent to USFS, indicating that the overall plan of the USFS to reduce road densities in its forest system was not the best use of the resources available.

**ROS Classification**

The area allocated Semiprimitive Nonmotorized should be allocated as Roaded Natural Sandy Plains and Hills (2.1).

Closing this area to motorized uses will compound the overcrowding expected over the next decade(1) by causing those users to be concentrated in other areas. It would be easier to resolve the incompatible uses of this area by allowing the motorized recreation to remain and educating the public about the availability of primitive experiences in the remaining Semiprimitive Nonmotorized, Roadless, and Wilderness areas in the forest.

Nationally, motorized use accounts for 18% of visitor use, while roads comprise less than 2% of the total land area of the national forests.(2) In contrast, less than 2% of forest visitors use designated Wilderness areas, where opportunities for solitude, naturalness, and the absence of motor vehicle noise, which comprise 18% of the available lands.(3)

**Area Map**

On the map below, we have outlined a Semiprimitive Scenic Driving Route chosen to meet the needs of the forest users in this area. Campers, hunters, anglers, and recreational drivers will all have access to the White River. Hikers, equestrians, and cyclists will still have an equal if not greater overall trail mileage.

Less than 2 miles of our proposed route lies on your proposed nonmotorized route. These segments can be designated mixed use. This will have the added benefit of breaking your proposed nonmotorized route into smaller segments that recreational walkers can utilize for 1 to 3 mile hikes instead of having to walk the much larger circuit at once. We believe that this would greatly increase the public use of the proposed nonmotorized route.

We have emphasized historical campsites and excellent locations for new campsites along the White River. To improve the user experience, signs could be erected at each site telling any known history of the site. Some of these campsites are less than 200 feet from the river so a redesignation of the 200ft setback rule will need to be worked out.

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(1) Forest plan of 2006. 1 at page III-275.
(3) Forest plan of 2006. 4 at page 1.
Request Forest Roads be Left Open and Reopened for Public Vehicular Use

Because of the reasons stated above, we request that the following roads reopen or remain open year round:

FR7992, FR9011Q, FR5306, The east-west spur from 152 Ave to the Hopeton campsite, The FR9011Q spur to the Eastside campsite, The spur to the Rockmill campsite, FR9012U, FR9314, FR9010R, FR5306, The road labeled FR5307 on the above map but labeled FR9045 on the MVUM, FR9353, FR 9013J, FR9364, FR5295, the two spurs north of FR9364 going from FR5295 ESE to the White River, and the road in the upper right corner of the above map going by the Pines Point Campground.
Recreation and Resource Issues in the Rural Management Area 4.4

Area Map

The segment of FR9310 that is proposed to be closed on the map below is a heavily used thoroughfare used to provide access to FR9311 and FR9312. Shifting the heavy traffic to FR9870 will cause resource damage to FR9870 and FR9871. Currently this section of FR9310 is used by full sized motor homes to access camping sites on the White River. FR9870 and FR9871 are much narrower and more rustic roads that will see an inappropriate increase in traffic if FR9310 is closed. Because of the decreased width of FR9870 and FR9871, vehicular damage is likely to occur from impact with roadside trees. This will likely result in those trees being illegally removed to widen the road for the larger vehicles that must now use that road.

FR9310 could be flanked with barrier posts or other suitable roadside barriers to discourage any cross country travel in the newly opened savanna areas. There should be a lot of left over brush from thinning operations that could be utilized here. Trees along the roadside could also be left in place. Because the tree canopy is so thin on much of this road segment it is unlikely to act as a dispersal barrier but would be highly effective as an ORV barrier.

During a recent tour of this section FR9310, we found no areas of resource damage or campsites. Granted, there was light snow cover, but damage was still visible in other areas with known damage even with the snow cover. This section of FR9310 just isn't that nice of a place to camp.

The map below lists 6 sections of road we would like open on the MVUM. They are primarily for river access campsites. The one major difference is the addition of an approximately 2 mile long road from the intersection of McKinley and 128th Ave ENE to 142nd Ave. The east end of this road, just west of the privately owned parcel has seen prior resource damage in a wet grassy area. We request that this road be opened and that grassy area be closed off with barrier posts or other suitable materials to prevent further damage.

The map below lists which campsites we would like to be open and which we would like closed. The lower right corner lists actions we would like to see at their respective sites.

Some of these campsites are less than 200 feet from the river so a redesignation of the 200ft setback rule will need to be worked out.

In general we would like all vehicular access to the river to remain open with the following exception: The campsite just south of Sand Rd at the east terminus of Roosevelt Rd needs to have vehicular access to the bottom of the hill blocked due to extensive resource damage.

Request Forest Roads be Left Open and Reopened for Public Vehicular Use

Because of the reasons stated above, we request that the following roads remain open year round: FR9310 and FR9309 in their entirety.

We would also like all of the yellow highlighted roads on the map below to be listed as open on the MVUM.
Other Issues

Redesignating some of these roads as for use by high clearance vehicles could lower your maintenance costs. We do not need bladed roads to enjoy our sport. This will also reduce the speed of the vehicles on these roads once they start getting bumpy. Reduced vehicular speeds would also reduce wildlife and other resource damage.

People camping in the woods would also prefer a more rustic and lower velocity road system. It keeps down noise and dust. People would much rather camp along a slow winding two-track than a 30 ft wide gravel road. Those campers that want civilization have improved campgrounds. Those that like it rustic are slowly losing what they value so dearly, a peaceful campsite, way out in the woods.

Thank You

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