January 10, 2010

Dear Mr. Frederick:

RE: Savanna Ecosystem Restoration Project

Please allow us to begin by thanking you, Mr. Russell and Mr. Walter for taking the time to review a significant portion of the Project area with representatives of the Two Trackers Four Wheel Drive Club, the Great Lakes Four Wheel Drive Association, and the United Four Wheel Drive Associations. Face-to-face, on-site discussion allows for a much more accurate exchange of ideas. It was, as always, a pleasure to work with all of you. We reviewed a number of sites during our tour, and those discussions will be bulleted below in the “Site Specific Comments” section.

PROCEDURAL ISSUES

I. Multiple Initiatives Offered Under the Title of Habitat Restoration.

This project is actually four separate initiatives: KBB habitat expansion, transportation management (road closures), soil stabilization (compaction and erosion issues), and designation of a foot/ bike/ equestrian path.

While there is no issue with undertaking as many initiatives as feasible at one time in a Project Area, each differing management activity should be listed in the SOPA and made more apparent in all associated documents, even if there is no legal need to do so. This would provide a great deal more transparency with, and less confusion to, the public.

II. Project Release Date

A. Projects involving possible changes in public access (road closures, camp site closures, trail designation, etc.) should not be released during the winter months.

The public not only has the duty to comment, but the burden to make an informed, substantive comment. These comments often cannot be developed without knowing the current conditions in a Project Area. Those conditions cannot be observed when obscured by snow cover. Snow precludes inspection of many important factors that may be involved such as road conditions, compaction
issues, endangered or invasive species presence (or absence) to name a few. Fortunately, Mr. Walter and I were intimately acquainted with conditions under the snow when we reviewed portions of the Project Area together. Meaningful dialogue and comment would not have been possible otherwise.

Please adjust guidelines to avoid this issue.

B. Projects should not be released for comment during the Christmas/ New Year’s Holiday season.

I reiterate that the public not only has the duty to comment, but the burden to make that comment informed and substantive. These comments can take all of a citizen’s spare time over the 30 day period. Scheduling Comment Periods during the busy Holiday season unnecessarily deprives the public of much needed time. Comment periods could be planned to end before, or begin after, the last two weeks of December so the Holidays do not interfere with an open comment period.

Please adjust guidelines to avoid this issue.

III. ROS Classification

The area allocated “Semi-primitive Non-motorized” should be allocated as “Roaded Natural Sandy Plains and Hills” (2.1).

Closing this area to motorized uses will aggravate the overcrowding expected over the next decade 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 Semi-primitive Non-motorized, 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. In contrast, less than 2% of forest visitors’ use designated Wilderness areas, where opportunities for solitude, naturalness, and the absence of motor vehicle noise comprise 18% of the available lands. On 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 non-motorized use - Forest Plan at III-6.1-4. The Forest Service estimates that nearly 1.5 million residents participate in OHV recreation in the State of 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 this area into a non-motorized desired future condition when failing to consider the current OHV demand, future demand, and the very recent and long standing patterns of motorized access in the area.

Please correct the designation of this area from 6.1 (SPNM) to 2.1 (Roaded Natural).
IV. KBB Management Direction

KBB Management direction appears pedantic and precludes the public’s desire for recreational access. Current management direction prohibits motorized and concentrated uses within, or adjacent to, endangered species habitat, thus creating conflict between the public’s access needs and habitat expansion surrounding and adjacent to roads, campsites, and other access points. While the public may desire the expansion of habitat and long term species viability, the loss of recreational opportunity is becoming less and less ecologically affordable as user visits increase. Loss of opportunity causes a proportionate concentration of use and the associated impact in those areas remaining accessible.

Please adjust management policies to avoid of high, moderate, and even low use sites and buffer zones around any pre-existing road or access site during endangered species habitat planning. Utilize the seasonal closure of roads during peak KBB activity if no alternative other than permanent closure can be found.

SITE SPECIFIC COMMENTS

MAP #3 Site Issues

Each site will be discussed in geographical order beginning at the intersection of FR9310/Sand Rd. and proceeding upstream until reaching Piketon Campsite. Then a review of remaining specific road issues will follow. It must be made clear that the MVUM and the Project Area Map #3 erroneously show FR9310 as “Sand Rd.” from Sand Rd. proper, proceeding northeasterly to the intersection of Roosevelt Rd. and 142nd Ave. Sand Rd. is a small, oblong road traveling from the intersection of Skeels Rd. and Bevins Rd. (more a curve than an intersection) to the intersection of Bevins Rd. and Fruitvale Rd. (also more a curve than an intersection) that also has another portion of Fruitvale Rd. extending to the southwest from the intersection directly opposite the southern terminus of Sand Rd. Sand Rd. is wholly a Muskegon CRC road and does not continue into Oceana County. Oceana CRC does not maintain an easement from Sand Rd. to the intersection of 142nd Ave. and Roosevelt Rd. This road segment is entirely owned by the NFS as a portion of FR9310. Please see the corrected map enlargement for clarification.

I. "A" This site is located on the west side of FR9310, approximately 1/3 mile north from the FR9310/Sand Rd. intersection. This site did not exist ten years ago. About seven years ago someone dumped a truck camper there, which sat rotting for months. Then, someone else burned it to the ground. A year or two later, someone abandoned a pull-behind camper there. This was removed by NFS several months later. The site has been a constant source of illegal trash that neighbors and the Two Trackers Four Wheel Drive Club do their best to keep picked up. It has now evolved into a large campsite with a double ended, “looped” entrance, where merely a decade ago there was only forest.
Please utilize barrier posts to obstruct use of this site to discourage future dumping allowing it to return to its natural state.

II. “A” Known locally as the “Dry Wash” (a dry creek bed), this location has flowing water up to three feet deep during high water events. This did not occur from 1989 through 2008. It flooded during the spring of 2009 for the first time in twenty years. When the water began to recede, evidence of illegal off-road ORV use became visible on both the north and south sides of the road/stream crossing.

Please place barrier posts along both edges of the road to prevent access to the streambed.

III. “A” Approximately 75 yards east of the Dry Wash on the north side of FR 9310 there is an illegal dumping area adjacent to the dry creek bed. All of the trash was removed by the Two Trackers Four Wheel Drive Club’s Adopt-A-Forest volunteer Clean Up. However, there are brush piles remaining.

Please utilize barrier posts to obstruct this site to discourage future dumping.

IV. “E” FR9303 has been obstructed by an adjoining landowner.

Please have the obstructions removed and restore public access to this public forest road.

V. “F, B” This site is also referred to as Damage Restoration Areas 4 and 5. The original site consisted of a small turn-around/parking area on the top of the river valley, and an original 1880s logging access road down the valley slope terminating in a small turn-around/parking area amongst the White Pine and Eastern Hemlock of the valley floor. The site was used in more recent decades as a quiet “out-of-sight, out-of-mind” parking area for access to the river for fishing (via a small foot path) and hunting access. Over last five to eight years, ORV’s began to climb the valley slope in areas other than the original parking area to FR9310. These new exits are marked (Damage Restoration) “4” at their intersection with FR9310. The original logging access road has also begun to experience some erosion.

Please consider leaving the turn-around/parking area on the top of the valley open. Moderate the erosion of the original 1880s access road through the use of “corduroy” style log placement, water bars, or other appropriate means to stabilize against future erosion of the roadbed. Add it to inventory during this project so that it will appear on the next publication of the MVUM. Use barrier posts to better define the turn-around/parking area at the valley floor in such a manner as to also prevent vehicles from exiting the lower parking area anywhere but the access road. Use barrier posts or other means to obstruct access to the damaged area of the valley slope via FR9310.

VI. “A” Slightly beyond Restoration Area 4 there is another campsite that has sprung up in the last 5-8 years. The area is now denuded of vegetation and soils are being negatively impacted over a large area.
Please utilize barrier posts to obstruct use of this site and allow it to return to its natural state.

VII. “B, C” This campsite and access road have existed, without incident, longer than we have been visiting this portion of the forest (over three decades).

It is requested that this site be left open to public use and the access road be added to inventory during this project so that it will appear on the next publication of the MVUM.

VIII. “F” This site is directly adjacent to the intersection of FR9310, Roosevelt and 142nd Ave. This area is also referred to as Restoration Site 3. This is a popular camping area on the top of the valley with an 1880s logging access road to the valley floor. ORV's have created 3 new paths up the slope of the valley wall over the last five to eight years.

Please utilize barrier posts to define a suitable campsite and parking area that will not be a major contributor to future site erosion. Obstruct access to the valley slope and repair the damaged hillside.

IX. “A” New campsite of five to eight years of age. This site also experiences a fair amount of illegal dumping over the side of the valley, particularly after campers have used the site.

Please utilize barrier posts to obstruct use of this site, discourage future dumping and allow it to return to its natural state.

X. Same as IX, above.

XI. “A” This campsite has entrances leading to it from both 142nd Ave. and from the road to Poison Springs (XII). This site has, again, only been developed over the last five to eight years.

Please utilize barrier posts to obstruct use of this site and allow it to return to its natural state.

XII. “A, B, C” This number is being used to discuss both the road into Poison Springs and the campsite that has developed at its end. The road to Poison Springs travels from 142nd Ave. south-by-southwest down over the edge of the river valley. It then splits in a “T” formation with the entrance from 142nd Ave. being the main stem and the top of the “T” being comprised of roads that will be discussed separately. The most westerly of the two roads forming the top of the “T” drops directly into the flood plain. The easterly road travels back into the Poison Springs area before terminating at a very nice campsite. This portion of roadbed also crosses a small, low area approximately three to five feet across and 12 to 18 inches in depth.

Please add the roads that form the main stem and eastern portion of the “T” to the road inventory during this project so that they will appear on the next publication of the
MVUM. Add a culvert to the eastern segment at the low point and obstruct the western segment of road with barrier posts or other means, leaving enough room to park a vehicle off to the side so as not to obstruct use of the other roads at the intersection.

XIII. “D” This site is located at the terminus of FR 9309 and is the second most popular campsite on this side of the river, second only to the Logging Camp (XVI). This site is one of the few to be utilized on virtually every weekend throughout the summer. It serves the local population as a campsite, picnic area, swimming beach and canoe launch/landing. It is a two-and-one-half to three hour float from this point to the County Line Bridge at Happy Mohawk. This location sees many hundreds, if not over a thousand visits per year. It is used as an overnight camp an average of ten of the summer weekends. Often multiple, unassociated families camp in several locations around the edges of the core access area. This writer has raised his children swimming and using the canoe access point here and has looked forward to doing the same with his grandchildren. Future generations should also be afforded the same opportunity.

FR 9309 should remain open to the crest of the hill on the edge of the river to be utilized as it has been historically. This site should be designated for camping and granted an exception to the 200 ft. camping/water restriction. Barrier posts could be utilized to prevent vehicle access near the edge of the river valley and to obstruct use of the trails down the back side of the hill on which the camp rests. There is a ring of trees at the top of the site, just short of the erosion, that would greatly decrease the number of posts and effort required, while allowing for a parking and turn around area. Bank stabilization should be kept to a minimum at this point in the river because the sandy beach created by the action of the river at this bend is one of the largest draws to the site as a swimming location for families with children. During our tour we had also discussed obstruction of the field adjacent to the hill on its west side (downstream). After more reflection, we believe the trails leading out of the field to the back of the hill, to the river, and to the back-side of Poison Springs should all be closed, but the field itself left accessible. This field often serves as overflow camping from the preferred site, as well as motor-home and non-popup camper parking, as they are unable to reach the preferred site. It is well away from the river and, aside from the other trails leading out from it, the field is experiencing no negative effects from use. Please obstruct all of the trails out of it.

XIV. “B” This road was omitted from the MVUM. It’s located from FR9309 to FR9870 along the upper edge of the Valley. It is quite scenic and has a canoe launch and campsite (XV) located at one point along its length. There is no resource damage associated with the road and it has been in use for longer than the three decades we’ve been visiting the area.

Please add this segment to the road inventory during this project so that it will appear on the next publication of the MVUM.

XV. “C” This is a very scenic campsite on the bluff above Lost Scout’s Bayou and is adjacent to an 1880s logging access point to the river that is often used as a secondary
canoe launch when site XIII is unavailable as a launch site. There is no apparent resource damage in this area.

No NFS action required if road XIV is added to inventory. Without FR9309 and XIV, the site and its access are eliminated from any of their current and historic uses.

XVI. “D” This is, by far, the most heavily utilized site on the west side of the White River. Over one hundred people have been witnessed camping here at one time. While this volume was excessive for the area, it can accommodate many unassociated families. This area is also utilized virtually every weekend from spring thaw through hunting season. We have no doubt that the number of Visitor Use Days for this site is well over 1,000 per year. The overwhelming majority of visitors utilize the FR9310/ FR9311 combination of roads to gain access.

While no activities are scheduled for this area, it is requested that some of the large boulders that were placed to delineate a parking area be repositioned. Some have been moved and the area is beginning to expand to the downstream side.

XVII. “B, D” Intersection of the North and South Branch. This popular site has already seen needed restoration work.

Request that the Road from Logging Camp (XVI) to this site be added to inventory so that it will appear on the next edition of the MVUM.

XVIII. “D” Tremper Campsite (Not on Enlargement) is an historic camp located on the bank of the North Branch of the White River that is still in use today. It is located at the end of FR9313.

Please designate for camping and grant an exception to the 200 ft. camping/water restriction.

XIX. “D” Piketon Campsite (Not on Enlargement) is also an historic camp located on the bank of the North Branch that is also still in use today. It is located to the east side of FR9312.

Please designate for camping and grant an exception to the 200 ft. camping/water restriction.

MAP #3 Road Issues

XX. “B” This site is only shown on the Northern Road Enlargement map provided. FR9312 and FR9872 historically intersected. It has since been found that the intersection falls within the boundaries of private property, and both roads have been obstructed by the new landowner.
It is asked that the NFS consider constructing a short connector around the corner of the private property. This will reunify this historic intersection allowing for travel through the area once again.

XXI. “B” Old McKinley Road (abandoned) from 128th Ave. east to 142nd Ave. is a roadbed of exceptional natural beauty. It bisects a six square mile area of otherwise roadless land, acting as the sole firebreak and emergency vehicle access. Approximately 1/3 of a mile west of its intersection with 142nd Ave. there is a small, grassy field with a natural spring in the far left corner (as viewed from the roadbed). The spring was heavily damaged several years ago by illegal ORV use and the road was barricaded closed a short time after that. This road is extremely desirable to the scenic and rustic backcountry driver. It is also extremely convenient when one is visiting the Piketon and Tremper area of the forest, as this road provides the most direct, quickest, and easiest route to the nearest store (Van Patten’s General Store on 116th just south of McKinley) and the nearest town (Rothbury) for other or 24 hour services. If this roadbed is not open to travel it will require money and manpower to keep it passable. It is much more cost effective to utilize the public’s travels to keep the easement free of overgrowth.

It is requested that the gate at the intersection with 128th Ave. be opened to the public. It is further requested that the barriers at the intersection with 142nd Ave. be relocated to obstruct the field where the spring is located; this will preclude future damage to the site while still allowing use of the road.

XXII. “B” This site is only shown on the Northern Road Enlargement map provided. There is an open roadbed from 128th Ave. east-by-northeast to Kent Rd. It is unobstructed, and there is no resource damage associated with the path.

Please designate the travel corridor for motor vehicle use and add to inventory so that it will appear on the next edition of the MVUM.

XXIII. This project proposes the closure of FR9310 from FR9870 to FR9311. This segment of road carries, literally, thousands of visitors annually. It handles car and truck traffic as well as motorhomes and campers traveling to the Logging, Tremper, and Piketon campsites. It also serves as the area’s primary Snowmobile Route during the winter. The closure of this road would force the traffic load from FR9310 to FR9309 and FR9870, neither of which currently possess the clearances necessary to pass campers or motorhomes. FR9309 and FR9870 have several narrow areas and pass through dense Poplar stands with low growing branches hanging into the easement at heights that would damage taller vehicles. It is feared that trees adjacent to FR9309 and FR9870, which obstruct travel to larger vehicles, would be illegally removed or damaged. It is probable that this area in particular, and both roads in general, would be widened by the increased traffic; and those visitors who desire a narrower, more rustic travel experience as these roads currently offer, would be displaced. There is also a soft, sandy segment of road near the intersection of FR9870 and FR9871 that would be problematic to heavier, low-clearance, and two wheel drive traffic.
Please keep FR9310 open from FR9870 to 9311.

MAP 4 (All Issues)

We would like to offer a comprehensive alternative road plan for the WRSPNMA. We believe that if the area cannot be appropriately reclassified as “Roded Natural Sandy Plains and Hills” (2.1), then our alternative will decrease impacts associated with high site use on all sides of the river system, offer a more diverse spectrum of recreational opportunity, restore access to historic sites to the use all citizen’s while effectually meeting the requirements and objectives of the WRSPNMA’s management direction. It will satisfy current and future demand for semi-primitive experiences, access to the White River (motorized and non-motorized), and reduce damage to sites on the sides of the river opposite the WRSPNMA. The White River is the leading attraction to the Manistee Forest in this area. While non-motorized recreational demand in the area may be high, motorized demand outweighs it several fold. Fisherman, hunters (all, not just firearm deer hunters), canoeists, pleasure drivers, campers, geo-cashers, and gatherers all require motorized access to the area.

Since installation of the barriers and gates began obstructing motorized vehicular access to the southern 2.8 miles of road, the western 2.6 miles of road and nine of the 13 historic campsites (in use for over 100 years) in the WRSMNMA five to eight years ago, resource damage has intensified tremendously on the other sides of the river. Those who are no longer able to access sites that they have utilized for generations are now forced into areas on the east and west sides of the WRSPNMA which were already near capacity before the closures. The number of new campsites has tripled and ORV damage has become problematic when none was present preceding the closure. The volume of motorized visitation this river system experiences exceeds the capacity of the areas outside of the WRSPNMA. Some form of compromise must be reached that includes access to the river and its campsites if recreation is to be dispersed enough to alleviate resource concerns. After three decades of observation of use patterns in the Project Area, we believe we have a compromise that will satisfy all parties and is illustrated on Map #4.

The proposed foot/ bike/ equestrian path would have less than two miles of shared use pathway with our proposed White River Semi-Primitive Scenic Driving Route (WRSPSDR). This equates to less than five percent of the footpath’s overall length. The path and WRSPSDR are most often separated by over one quarter mile of dense forest. Further, the decibel level of freeway traffic is at or below 70 dBA. Passenger vehicles traveling on unpaved roads at speeds less than ten miles per hour produce even less sound than 70 dBA, whereas the average decibel level of a single OHV less than fifty inches (<50”), such as a snowmobile, ATV, or motorcycle is 102 dBA as stated by the Noise Center of the League of Hard of Hearing in its Noise Levels in our Environment Fact Sheet. It is therefore reasonable to conclude that the addition of the WRSPSDR would not substantially interfere with the desired semi-primitive non-motorized hiking, biking, or equestrian experience.

Our proposal increases the number of recreational river access sites from the current four, back to the original thirteen sites while:

- **reducing road mileage** in the WRSPNMA by 5.4 miles of road below the current level,
- **reducing road density** in the area from a current 2.1 miles of road per square mile of land to only 1.4 miles,
- **Increasing the availability of semi-primitive non-motorized experiences.** There are currently about **3.5 square miles** of land farther than ¼ of a mile from a road. Our proposal would increase this to **5.5 square miles of land**.

While the project in the Scoping letter reduces road density to 1.1 miles of road per square mile of land, it only results in **5.3 square miles of land** being farther than ¼ mile from a road while effectively closing ALL 13 historic access sites to the 98% of Americans who choose not to recreate in Wilderness or Semi-Primitive settings per the *(National Forest Road System and Use Report, USDA Forest Service, Coghlan, Gerald and Sowa, Richard, 1998)*. We believe the proposed increase in the number of access sites, reduction of road density, and increase in semi-primitive experience offers the most diverse and reasonable use of the area.

The Two Trackers Four Wheel Drive Club is uniquely qualified to assist with the implementation of the proposed WRSPSDL. Funding for the long-term care and maintenance of this area and new trail mileage can be secured through collaborative agreements and partnerships with local and regional four wheel drive organizations (like ours) utilizing their volunteer efforts and access to the Recreational Trails Program and private funding sources. Utilization of collaborative solutions with four-wheel drive partners was recently highlighted and *encouraged* by Forest Service Chief Dale Bosworth at the OHV Collaborative Summit in California in April 2005. Our club is very interested in improving rustic trail riding opportunities. We are willing to assist with all phases of the project. We have experience in trail maintenance, mapping existing systems, design and lay out of new trails, closing undesirable or illegal trails, returning old roadbed to a natural state, building trail features such as water bars, silt screens and traps, seeding and fertilizing trail sides, installing signs, and trash pickup. Through our Adopt-A-Forest efforts we have developed good working relationships with Otto and Greenwood Townships and the Oceana County Road Commission. We are perfectly positioned to advance the proposed abandonment of OCRC roads as the holder of the Adopt-A-Road contract for these very roads.

In addition, the Two Trackers Four Wheel drive Club, Inc. supports the designation of the proposed hiking/ biking/ equestrian path adjacent to the WRSPSDL.

**ADDITIONAL MISCELLANEOUS THOUGHTS**

I. The Club opposes the closure of FR7992, FR5306 and FR5307 without the designation of the WRSPSDL. There are simply too many people who have formerly, and are currently, utilizing it.

II. It has been found that FR7992 is listed on maps as far back as the Michigan Atlas published by George A. Ogle & Company in 1913. This road should not be closed but remain open for use, as it is a link to our past. In its role as the only remaining connector between 148<sup>th</sup> and 152<sup>nd</sup> Avenues, it is as important historically as it is aesthetically. There are very few century-old roads that have not been widened, paved, and/or
otherwise “improved”. This road should be preserved as a historic pathway and not closed to the very use that it has served so well for a century or more.

III. Throughout the document, reference has been made to the use of barrier posts or other suitable means of obstructing access. We believe large boulders would be a preferred material for this purpose due to their natural character; however, we understand they are more expensive in comparison with other materials. Log construction is inexpensive, but lacks durability. Treated barrier posts appear the logical compromise between durability and cost, although it is understood that the material most expedient must be utilized.

Thank you for your time and consideration,

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Two Trackers Four Wheel Drive Club, Inc.  
United Four Wheel Drive Associations