# APPENDIX C.

# SUMMARY OF PLAN/PEIS PUBLIC COMMENTS

# MONTANA STATE TRAILS PLAN/PEIS:

# SUMMARY OF DRAFT PUBLIC REVIEW PERIOD

## COMMENT PERIOD

The public comment period on the Draft Trails Plan/PEIS started August 1, 2000 and ran through September 25. Based on two requests for an extension, the comment period was subsequently extended until October 10.

Mid-way through the comment period, public open houses were held in Helena, Great Falls, Bozeman, Billings, Miles City, Kalispell, and Missoula. Attendance at the open houses was generally light, with total attendance of approximately fifty people, more than half of which attended the Billings meeting. Attendance may have been affected by the worst forest fire season in decades, in part because the fires were getting much of the media attention.

The public comment period and open houses were publicized through press releases, legal notices, and the Montana Trails Newsletter, which is circulated to more than 600 individuals and groups with an interest in trails. In addition to newspaper articles and notices generated by the press releases, there was some radio and television coverage as well. Copies of the Plan/PEIS were also mailed directly to individuals, organizations, and agencies with an interest in trails. Finally, executive summaries of both the Plan and PEIS were posted on the FWP web page, with a notice about the document appearing on the State Electronic Bulletin Board.

A total of 325 comments were received from individuals, organizations, and other agencies (not including internal FWP comments). A summary of the substantive issues raised by the comments along with FWP's responses is included in the PEIS Appendix. The complete set of comments on the drafts are available from FWP upon request.

## SUMMARY OF COMMENTS RECEIVED

### Public and Organization Comments

Comments were received through the mail, electronically, by fax, and over the phone; the majority of comments were received through e-mail. Comments from individuals and non-profit organizations totaled 319. In general, these comments were highly polarized around motorized/non-motorized trail use. Of the total, approximately 215 (67 percent) reflected a non-motorized perspective, 92 (29 percent) a motorized perspective, and 12 (4

percent) were generally neutral. It is worth emphasizing that public comments are not considered to be a vote or scientific survey of public opinion, and the number of comments from a particular perspective is much less important than the substantive issues and new information raised.

The majority of the comments received were either form letters or adaptations of form letters. From the non-motorized perspective, 191 comments (or 89 percent of the non-motorized total) appeared to be based entirely or in part on a form letter circulated by the Montana Wilderness Association (MWA).

All of the substantive information in this set of comments was contained in MWA's (headquarters office) comments. As was the case with the other form letters, it appeared that many individuals submitting comments were not familiar with the documents, but were merely repeating statements from the form letter template, without specific references to the Plan/PEIS or the addition of new information.

Most of the comments reflecting a motorized perspective were also based on form letters (88 form letter comments, or 96 percent of the motorized total). However, there were three different form letter templates used to reflect motorized perspectives, each organized somewhat differently.

Organizations that submitted comments included the following:

- Montana Wilderness Association (Helena Headquarters)
- Montana Wilderness Association (Wild Divide Chapter)
- Montana Wilderness Association (Eastern Wildlands Chapter)
- Orion—The Hunters' Institute
- Orion Enterprises
- Montana 4x4 Association, Inc.
- Predator Conservation Alliance
- Backcountry SnowSports Alliance
- Deerlodge Forest Defense Fund
- Montana Wildlife Federation
- National Off-Road Vehicle Coalition
- The Ecology Center, Inc.
- North Fork Hostel
- Flathead Audubon Society
- Friends of the Bitterroot
- Backcountry Skiers Alliance
- Native Forest Network's Last Refuge Campaign
- Montana River Action Network
- The Cabinet Resource Group
- Montana Parks Association
- Greater Yellowstone Coalition

## Agency Comments

Written comments on the public review drafts were received from a number of government agencies, including the following:

- U.S. Forest Service, Region 1
- Helena National Forest
- Montana Department of Transportation
- Missoula Parks and Recreation Department
- Missoula Office of Planning and Grants
- Butte-Silver Bow Planning Board

Overall, agency comments contained factual corrections or updated information, rather than requests for major changes.

Prior to public review, written comments on agency review drafts of the Plan/PEIS were received from the Forest Service Region 1 Headquarters in Missoula, the BLM's Montana State Office in Billings, Glacier National Park, and the State Historical Preservation Office; these comments were incorporated into the public review draft. Phone conversations with staff from some of these agencies during the public review period indicated they did not feel a need to submit additional comments during the public review period.

## State Trails Advisory Committee Review (STAC)

All members of the STAC were sent copies of the Plan/PEIS at the beginning of the comment period. Part way through the comment period, the STAC met to discuss the documents. In addition, some members of the STAC submitted comments in writing after the meeting, which were added to the record. Substantive issues raised by STAC members either collectively or individually are included as part of the PEIS Appendix.

## FWP Comment and Review

Copies of the Plan/PEIS were made available to staff throughout the agency, and were circulated directly to members of the interdisciplinary FWP Trails Advisory Committee, which had considerable responsibility for reviewing earlier drafts of the documents. Following the public review period, a summary of the public comments was distributed to the Advisory Committee for review and discussion. The Advisory Committee was responsible for helping review substantive public comment, and recommending potential changes to the documents. The documents were revised based on direction given by the Parks Administrator. Comments on the public review drafts made by FWP staff are included with the public comment summary in the PEIS Appendix.

# SUMMARY OF WRITTEN AND SCOPING MEETING COMMENTS

## Summary of Written Public Comments

A total of 315 written comments were received during the public comment period. A report is available from FWP that summarizes scoping period comments in much greater detail than is included here. A large number of form letters were received regarding certain issues (e.g., number 2 under statewide issues). The number of comments refers to the number of times a particular issue was mentioned. The twelve most frequently mentioned statewide and local issues are listed below.

| Statewide Trail Issues | # of Comments |
|---|---|
| 1. Quiet non-motorized trails | 216 |
| 2. Federal environmental review laws apply to *State Trails Plan* | 76 |
| 3. Commercial motorized park(s) as alternative to motorized trail use | 72 |
| 4. Trail funds should go to rehabilitating ORV trails | 72 |
| 5. Improve funding for trails | 36 |
| 6. Reduce resource damage and control noxious weeds | 18 |
| 7. Better trail/trailhead facilities | 17 |
| 8. Increase availability of trails | 17 |
| 9. Need connecting trails, loops, and linkages | 16 |
| 10. Provide multiple use trails | 15 |
| 11. Address diminishing access | 12 |
| 12. Improve trail-related law enforcement | 12 |

| Local Trail Issues | |
|---|---|
| 1. Expand trail supply, availability for all users | 26 |
| 2. More quiet non-motorized trails | 24 |
| 3. Expand/improve funding | 22 |
| 4. Improved trail and trailhead maintenance | 16 |
| 5. Resolve trail conflicts | 16 |
| 6. Address trail closure issue | 11 |
| 7. Reduce resource damage and control noxious weeds | 11 |
| 8. Provide multiple-use trails | 10 |
| 9. Need connecting trails, loops, and linkages | 8 |
| 10. Trail education | 6 |
| 11. Increase enforcement of trail regulations | 5 |
| 12. Address loss of trails due to development | 5 |