

CWCS

Preserving access to and multiple-use of
public lands & waters

Conservationists
with Common
Sense



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Appeal Deciding Officer
Kent Connaughton, Regional Forester
USDA Forest Service
Gaslight Building Suite 700
626 East Wisconsin Ave.
Milwaukee WI 53202-4616

February 6, 2009

Re: Superior National Forest Travel Management Project

Dear Regional Forester Connaughton,

Conservationists with Common Sense (CWCS), an organization of 4000 members from all across the nation, has a mission statement to preserve access to and multiple use of our public lands and waters.

CWCS encourages the US Forest Service to implement Alternative 3. This alternative provides opportunities for the ever-increasing number of people who enjoy ATVing on our public lands.

CWCS is pleased to see that existing roads and snowmobile trails are being used as much as possible. This reduces forest fragmentation and protects sensitive species. It also protects aquatic resources, as there are bridges and/or culverts at stream crossings. Using existing roads and trails also eliminates the concern regarding the spread of non-native invasive species (NNIV), but we feel snowmobile trails should be exempt from the 90 mile "new trail" designation, since these are existing motorized-use trails.

CWCS believes that the Forest roads and trails considered in Alternative 3 can sustain ATV traffic, or can easily be adapted to the Forest Service's best management practices for roads and trails.

CWCS would also like to see the Forest Service implement Alternative 3 to fulfill, in part, its promise to provide expanded motorized recreational opportunities. The *1978 Boundary Waters Act, Sec. 18 (a). Expansion of Recreation Programs* states: *The Secretary is authorized and directed to expedite and intensify the program of dispersed outdoor recreation development on the Superior National Forest outside the Boundary Waters Canoe Area Wilderness, as designated by this act. The Secretary shall consider in such new program development the need for the following: additional snowmobile trails, particularly those now planned or under construction; remote campsites on lightly developed lakes; and lake access sites and parking facilities to provide motorized recreation experiences similar to those previously available in the Boundary Waters Canoe Area.*

Since the Forest Service's own mixed-use analysis has ascertained that all system roads are considered very low volume roads (average daily traffic (ADT) of less than 400 vehicles per day) – pg. 27, *Decision Notice*, it is impractical to restrict ATVs from any public forest roads. Alternative 3 would open more OML-3, 4, and 5 roads. The Forest Service should open roads such as The Grade, Ball Club Road, the Greenwood Road, Richey Lake Road, and others.

CWCS urges Superior National officials to proceed slowly with decommissioning of any roads until public feedback can be obtained on each specific road. As was the case in the user-created trail to Kinogami Road in Tofte, users may not be impacted by closures. There are many “unclassified” roads that provide access to lakes for fishing, minnow trapping, fur trapping, berry picking, youth and family practice rides, etc. that may severely limit historic use of forest resources.

One of CWCS's concerns with the Travel Plan is lack of links to any businesses or services. The Minnesota Department of Natural Resources, St. Louis County, Cook County, Lake County, and the Grand Portage Band of Lake Superior have stated a goal of providing access to services for ATVers, as is available to other forest users. Better coordination with other landowners and Governmental bodies needs to be taken to provide these service connections.

CWCS strongly supports the Forest Service analysis that the changing designation of existing roads in no way impacts non-motorized recreation on National Forest lands, nor impacts the wilderness character of the Boundary Waters Canoe Area Wilderness. Since these roads are currently used by motorized traffic of all kinds, OHV traffic will not cause any negative impact to non-motorized users, and the Travel Management plan reduces the number of roads near the BWCAW, there is no impact on the wilderness.

CWCS agrees that consolidating OHV use will result in lower road maintenance costs, cleaner water, improved wildlife and fish habitat, and fewer conflicts between motorized and non-motorized recreationists.

CWCS is encouraged that the motor vehicle use map will be updated annually and changes could be made in the future. CWCS would eventually like to see the Tomahawk Snowmobile Trail incorporated into a multiple use trail to connect to the Stony Spur and to Isabella. A long standing request of CWCS, snowmobile clubs and ATV clubs has been for a multiple use trail along the Echo Trail to Buyck. Ely and Crane Lake snowmobile clubs have been attempting to continue this plan of an Echo Trail Corridor Snowmobile Trail that was proposed by the late Senator Paul Wellstone during the 1996 Senate Field Hearings in International Falls.

Thank you for the opportunity to comment.

Nancy McReady
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