

Porcupine Lowline Trail Obliteration and Relocation Public Comments

Though the Forest Service has ignored the proper NEPA process for their Proposed Porcupine Ibex Trail, instead claiming a “Categorical Exclusion”, please send in a public comment, this gives you standing in the case. Once the Forest Service makes a decision, a suit and injunction can be filed to remedy this situation. We need the proper science, agency/specialist input and legal process to fully weigh and consider the impacts of the Forest Service proposed actions.

<https://www.fs.usda.gov/project/?project=53388>

Written comments must be submitted via mail, fax, or in person (Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding holidays) to: Mary Erickson Forest Supervisor, ATTN: Chad Benson, PO Box 130, Bozeman, MT 59771. Electronic comments including attachments can be submitted to:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=53388>

Formats that will be accepted for electronically submitted comments are: Word, PDF, and/or Excel.

Points to address in your public comment:

- The Project was categorically excluded from preparation of an Environmental Assessment or Impact Statement despite the Forest Service NEPA requirements consulting with cooperating agencies (Montana Fish, Wildlife & Parks was not consulted about ungulate habitat concerns or “Sensitive Species” wolverines/Yellowstone Cutthroat Trout in the area); 8+ miles proposed trail relocation, involving up and down steep, high elevation terrain that crosses 4 creeks. Their manual states - "Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS are: (1) Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species; (2) Flood plains, wetlands, or municipal watersheds;" We need the proper EA/EIS process.
- Forest Service documents record numerous complaints, by the public, of landowners obstruction and harassment while on the Porcupine Lowline trails (purchased their land in the 1950s with a pre-existing public trail system). The same documents show the landowners and their agents have been vigorously obstructing public access since the creation of a hunt club: FS investigation of Porcupine Lowline Trail, notes signs and blaze trees, landowners had placed signs “Trail Closed, Private Property, No Trespassing”, signs covered over tree blazes, FS signs had been removed. Where is the FS action against the obstruction to our public access?
- During this rushed process for scoping, no discussions of historical prescriptive easements, deeds easements or right-of-ways was questioned, researched or addressed. Enhancing Montana's Wildlife & Habitat (EMWH) has been researching, documenting existing easements and right-of-ways, contacting the proper authorities to see where the public stands on access, a trail providing recreational access for the young and the elderly. Why has this subject been missing from the discussion?
- The Forest Service has been marketing this proposal as a connecting of, “the Porcupine and Ibex Trailheads and the two recreation rental cabins.” The cabins are already connected by this historic Porcupine Lowline trail system. The Forest Service just needs to defend the public access we already have, per their policy and the 2005 Final Travel Management Rule. Why has the FS not defended this historic cabin trail system?
- The current Porcupine Trail #267, which connects the Porcupine and Ibex cabins, is motorized access for mountain bike, motor bike and snowmobile. At the meetings, the proposed trail was discussed as having the same motorized rights. Yet the FS released this proposal without motorized rights. Motorized users are demanding the same motorized rights be applied to the proposed trail, which would increase costs of the trail, maintenance and affect habitat security, possible watershed/erosion issues, also requiring the EA/EIS process. Why would the FS abandon an established trail with motorized access?
- Custer Gallatin National Forest Supervisor Mary Erickson stated at a public meeting on the Crazies, August 2017, that there was no money for trails. While FY 2017 funding for trails and roads maintenance remained relatively the same as FY 2016, the current administration has viciously attacked trails maintenance funding. Trails maintenance declined from 77,383 (dollars in thousands) to 12,700, an -84% cut. The Legacy Roads and Trails maintenance dropped from nearly 40,000 to 0, a -100% cut. Why spend money on a new trail, when we can defend the motorized trail we already have and have had for about 100 years?