Response to Comments on the Proposed

Forest Classification

and

Forest Road and Trail Designations

for

State Forest Lands

in

Koochiching and Eastern Itasca Counties

December 15, 2008

Minnesota Department of Natural Resources

Koochiching - Itasca Road & Trail Project Team

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Acknowledgments

The DNR Koochiching - Itasca Road & Trail Project Team gratefully acknowledges the contributions of the following individuals to the forest road and trail designation process.

Dennis Hummitzsch ..... Koochiching County Land Department
Dave Marshall ..... Itasca County Land Department
Elmer Cone ..... Itasca County Trails Consultant
Craig Halla ..... Forest Capital Partners
Jim Marshall ..... UPM Blandin
Bob Moore ..... DNR Trails & Waterways
Mark Spoden ..... DNR Fish & Wildlife
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INTRODUCTION

On August 25, 2008 the MN DNR published a notice of the proposed motor vehicle use classification and road/trail designations for State Forest lands in Koochiching and Eastern Itasca Counties in the *State Register* (page 396). The proposals were described in MN DNR statewide news releases dated August 26, 2008 and October 7, 2008. Public meetings on the proposed classification and road/trail designations were held on October 28, 2008 in Grand Rapids, October 29, 2008 in International Falls, and October 30, 2008 in Bigfork to explain the proposal and to receive comments. The public comment period ended on November 7, 2008.

The DNR received comment forms, letters and e-mails from individuals and organizations. The DNR appreciates the time and effort of everyone who commented on the proposals. The draft proposals were improved and clarified as a result of the public review process.

This document is a compilation of the comments received and the DNR's response to the concerns about the proposed motor vehicle use classification and road/trail designations. The DNR's motor vehicle use classification and road and trail use designation decisions for State Forest lands in Koochiching and Eastern Itasca counties will be based on the draft proposal and the response to comments. The classification and road and trail designations will be implemented by publication of written orders of the Commissioner of Natural Resources published in the *State Register*.

The DNR uses a content analysis process to develop a response to concerns expressed by commenters. Comments were grouped by topic and statements of public concern were developed. The agency response to topics of concern and changes to the public review draft proposal are contained in this document.

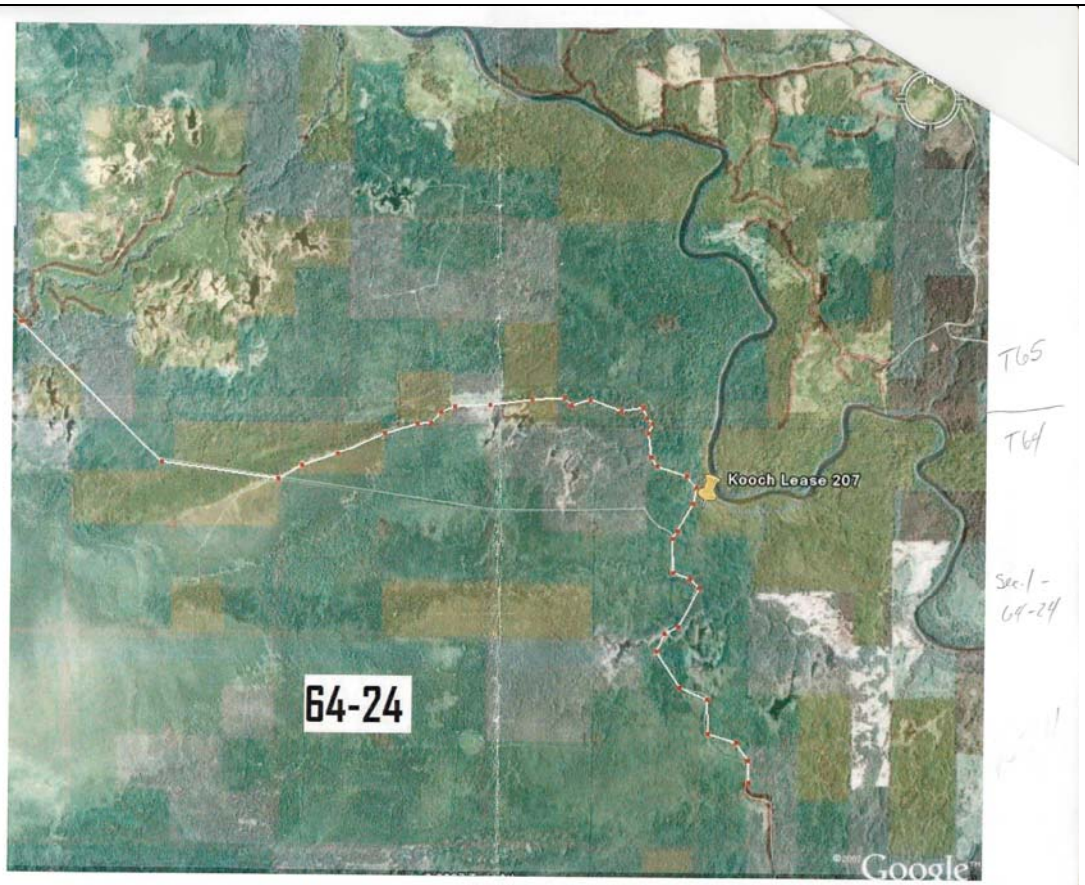
COMPILATION OF COMMENTS

Transcribed comments are presented below. The transcription process maintained the content of the comment to the extent possible. Greetings and closings were not transcribed. There was no attempt to correct spelling, grammar, or misstatement of facts. There may be some errors due to illegible handwriting or typing errors by the transcribers. The comments are listed in alphabetical order by the last name of the person submitting the comment.

The numbers to the left of the comments are hyperlinked to the topics that are addressed in the agency response section of this document.

	Andrews Jr., David
01	My comments are the following: The trails that are called non-destination trails are, actually, trails that are used. Even if the trail only goes in a short distance, it is still a place to ride, and the users want and like some places to ride, investigate and return to. I think it would be in the best interest to keep the trals open so that there are more places to ride and that will keep people from trying to go cross country to make their own trail when these trails already exist. Making trails available in the winter would be good.
	Bishop, Jeff
02 03 04	My name is Jeff Bishop. I have lived in Grand Rapids all my life and work at Blandin Paper Company. I have a hunting shack on the Lofgren Truck Trail (located north of Hwy 1 between Effie and Togo) which I have had for 28 years. I believe ALL of this country should be left open to ATV use. Almost all riding occors during hunting season as during mid-summer the bugs will carry you off. Spring riding was great too till you guys shut it off. Virtually every trail that I am familiar with in this area are former and current logging trails. I've seen nothing that I would call environmental damage and every blade of grass and clover grows back in the spring. This is very big country that would be inaccessable to hunting without ATV's. Especially deer hunting. Loops are routinely 20 to 30 miles or more. I hunt with a dog also and the atv's keep the trails open for such. We should not bow to the pressures of the big city people and beaurocrats who never set foot in these woods. This is not scenic hiking Colorado style. The camp 2 1/2 miles behind me through the woods is where the Mn. Deer Hunters organization was founded. You can't even get into their camp or mine without an ATV. If the DNR really wanted our opinion they would send out

05	questionares to all the licensed ATV operators. If you map all these trails, then you will be just asking for heavier use by the people who wouldn't normally take the years to learn it. I would be more than happy to personally take you on a ride through the area so you would have first hand knowledge of it. The invitation stands.
	Cass, Mark
06 07 08	A couple different points here: 1. CO's please use common sense, change isn't going to happen overnight. I believe it's going to take some time to get familiar with the situation. 2. Can some of those closed areas (swamps) be ridden after freezeup? I ride all year long and some of those old winter roads thru swamps are great to get places on. Work on some snowmobile trail access for ATVs also. 3. I have been riding since 1979 and the people that bitch are not out there in the woods. You run into damn few people walking out here and the ones that are out there I stop and talk to. The ones with any sense realize it's ATVers keeping the trails open. There's no such thing as a 'grouse trail' only logging roads, etc. and ATVers make it possible for all.
	Dierkhising, Marvin
09 10	Being a land owner bordering the Larson Lake Limited OHV area, am surprised by the proposal. In reading the Limited management reasoning, it states "These forest lands are characterized by moderate to high levels of motorized and non-motorized recreational use. It is necessary to designate OHV trails so that OHV use occurs only in suitable and sustainable locations." The many day's I have spent on my land and exploring the area, I cannot agree to this being a "moderate to high level" of traffic in any manner. The Larson Lake proposed area may be deemed moderate during opening of small game, deer or fishing opener, but during the normal course of the year there is just the usual forest timber harvest traffic and occasional OHV use. Most of this area is gated forest harvest areas which restricts most traffic anyway. We the people that actually hunt fish and live in this area will be greatly affected by the limited change. I use an ATV for deer hunting, small game hunting and fishing only because I am getting to an age where its use allows me to go that distance otherwise I would be restricted to closer proximity to my land. The Larson, Coon and Beatle (little coon) lakes have some of the best panfish and northern pike fishing in the area, and the only access to these lakes are OHV. This change would restrict mostly older persons from enjoy this pastime for this area. In summary, I am against any proposal that would further restrict or change the trail designation of the Larson lake OHV area. Thanks for allowing my input.
	Duncan, Cory
11	I'm wondering if the upcoming meetings about OHV use in state forests would cover the normal Polaris/Arctic Cat/Honda 4x4 or 6x6 ATV or are these other types of OHV? Are the meetings focused on use on trails or developing riding roads or trails? How would I go about expressing my opinion and concerns to the right DNR person/Department about ATV use on trails and roads near my cabin and deer shack as it is shameful and is bad for hunting and the dnr. Is anybody out there listening? Do you know of a group that is trying to limit ATV use in MN or trying to impose any new rules?
	Fairhurst, Tom
12	Attached is a map of the trail I use to access my cabin, which is a Kooch County lease. This trail was not on your inventory, but it is one I have maintained for 25 years. Please let me know if there are any plans to change the status of this area from the current plan.



Hakomaki, Emil

13, 14

1. Please update maps with updated roads (those being built by landowner) before certifying as managed, limited, or closed. My own area south of Larson Lake there are two major logging road improvements that need updates. Those done within last 18 months.
2. Have a Group/Person – well advertised, documented, and known by ATV clubs – General Public to assist in trail opening, policies, etc.
3. Meeting had good information.
4. Person working for state with DNR connections, state connections, ATV club connections to spearhead trail access, issues.

Hardy, Len

15 Need more winter riding trails for ATVs. I am working on a proposal for a snowmobile/ATV trail from Junction Bar (Highways 65 & 1) to Viking Bar (County Highways 22 & 5).

16 Signs for ATV trails should be either yellow or brown background instead of the current red background. Some people interpret the red signs as meaning ATVs are not allowed.

Heikkila, David

17 The old adage, a day late and a dollar short, came home to roost again over the past week. After reading about the upcoming public comment meetings regarding state lands I found three State forests closed to motorized traffic, three limited and two managed.. Interesting to me, that the ones changed from managed to limited, are all in the Chippewa. Where were the notices to comment? All in the official newspapers of those counties, correct? What would it take for the DNR to notify all sportsmen/women who support the DNR with license fees, boat, ATV, snowmobile registrations etc? I know there is a current list of these folks available for your use. Could it be that the DNR does not want us to comment? There were listed only 149 comments for the Beltrami, Cass and Itasca county area. From my count 11 were for complete closure, 10 for something in-between, 31 from special interest groups, 18

for managed and 13 for limited/closed and the remainder for managed/open and to leave some Forest Service roads open, a very small amount of comments with so many people effected.

When the meetings were going on with the Forest Service plan they stated they would be consistent with the State/Counties. Now I see they were instrumental in having the State/Counties be consistent with them. How can that be? I attended numerous meeting with the FS, with state and county officials present. Did any of your people relay any information from those meeting to the state? Are you aware of the resolution passed by the Itasca county board, to the FS, stating, in part, 'no roads or trails in Itasca county shall be closed prior to the FS appearing before the board proving the road/trail in question was/is not an RS2477 right-of-way? This is a right the FS/DOI cannot adjudicate, only congress has that authority. The answer, this is not in the scope of the DNR plan, is not acceptable. (not to mention, under strict reading of the Constitution, the federal government cannot own one square inch of land in Minnesota, or any other state,
without the express authority of the State, which does not mean state government) If you do the research, you'll find this to be true.

I feel the DNR acted with the same regard for the citizens as Wall Street. There was no transparency in that the DNR fell to the side of the I. Walton, Audubon Society, FS and special interests groups again . Both the Bowstring and Remer forests had the same comments listed on your site, #111 and #148, and they both lie in the Chippewa. I feel the DNR had a plan and decision (to follow the FS plan) prior to any meetings, therefore, failing to be transparent and notify those who pay the bills the DNR racks up. (not to mention the summer fling) Is the DNR a government within a government?

After fifty plus years of enjoying the outdoors my thought is to "boycott" the DNR and its activities. In fact, if all sportsmen/women did the same for a year or two, maybe we could at least be asked for our opinion and actually have some input in some of these decisions. I am very disappointed.

Hendriks, Sam

>>> Sam Hendricks 9/8/2008 1:13 PM >>>

18 Does this proposal affect cabins on the caldwell forest rd with 4-wheeler access? Thanks

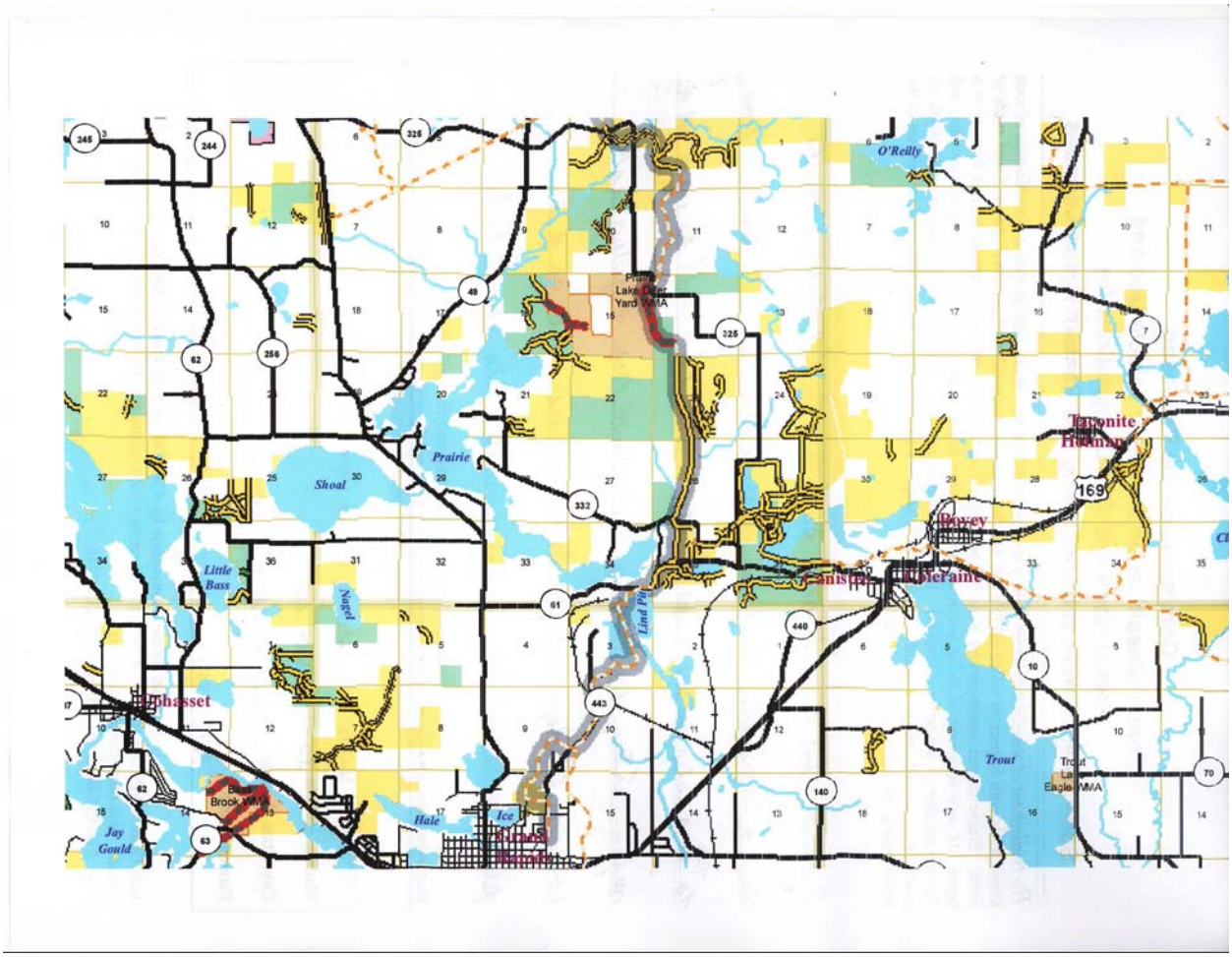
>>>>>>>>>>>>>>>>>>>>>
From: Jack Olson
Date: 9/10/2008 9:17 AM
Subject: Re: access proposal
Attachments: map legend.jpg; Caldwell Brook.jpg

Sam,

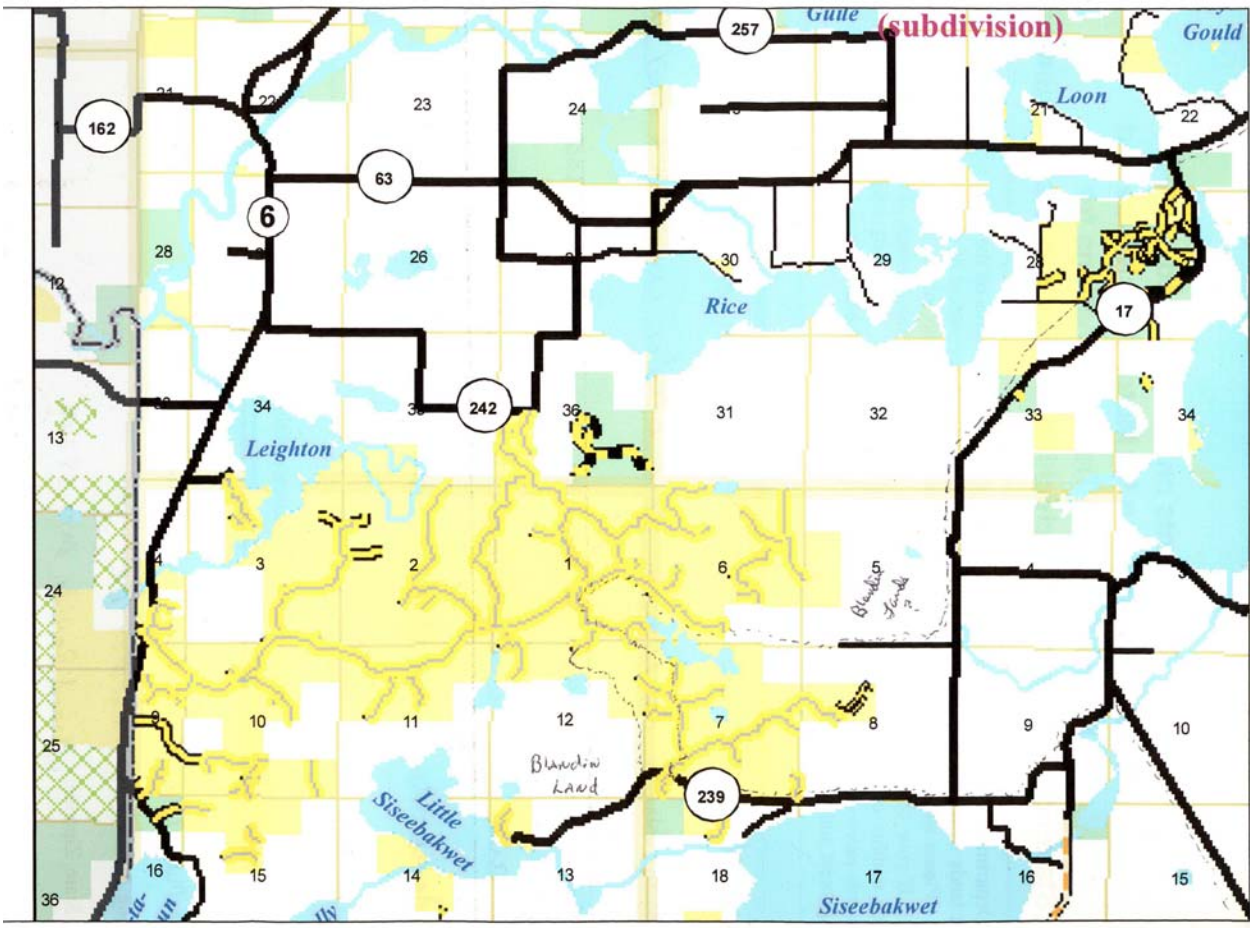
The Caldwell Brook Forest Road will be designated as a system forest road and will remain open to highway-licensed vehicles (cars, pickups, etc.) and OHVs, including ATVs. The Caldwell Brook Spur Forest Road will be a minimum maintenance forest road and will also remain open to all types of motor vehicles. Most of the dead-end routes leading off from the Caldwell Brook and Caldwell Brook Spur roads will be considered access routes. Several of these access routes lead to cabins. Since the State Forest land in Koochiching County is proposed to be classified as 'managed' with respect to motor vehicle use, these access routes will be available for motor vehicle use in an 'as-is' condition. The access routes will not be signed or maintained and will not be shown on public user maps. When operating a vehicle on an access route it is illegal to cause ruts, erosion, or damage to trees. Only one route leading off the Caldwell Brook Forest Road in Sec. 15 - T63N - R26W will be signed as closed to motor vehicle use due to excessive rutting that has occurred on that route.

The attached files show the route designation map for the Caldwell Brook area and the legend for the map. The draft plan and maps for all of Koochiching and eastern Itasca counties are on the DNR web site at: http://www.dnr.state.mn.us/input/mgmtplans/ohv/designation/status.html#K
Public meetings on the draft plan will be held in Grand Rapids on Oct. 28th, International Falls on Oct. 29th, and Bigfork on Oct. 30. The public comment period on the proposed forest classification and road/trail designations will

	remain open until November 7th. Contact me if you have further questions or comments.
	Hiebert, Tony
19	I would like the Arrowhead Snowmobile Trail in Sections 13 & 14 – T69N – R22W open to ATVs during hunting season to access my deer stands and hunting shack. This would allow others to visit us at our shack. Currently visitors are not allowed on this portion of the trail without having permission or being part of our hunting party. This part of the trail is currently the only access to our shack. Our shack is on a county lease. So my request is to allow ATV travel on these sections of the Arrowhead Trail.
	Hilla, Mike (Grand Rapids ATV Club)
20	I think that it would be a good time to let ATVers on the Taconite Snowmobile Trail during the winter time. It's time to take a step in the right direction. This trail could be used as a main artery for making destination and loops of future trails connect. I hope that the DNR could use this as a trial period. We can ride on frozen water, lakes, etc.



	Hilla, Mike #2 (Grand Rapids ATV Club)
21	I would like to see a corridor through Blandin Lands & Rajala property for ATV use if we are to get to Grand Rapids from Sugar Hills or the 70 Mile Trail. We would need access from this area to be able to make future trails in the area, to enhance the future of ATVs and promote new business.



Johnson, Cavour

22 I am writing to express my views on the DNRs Forest Management Plan for the George Washington and Koochiching State Forests specifically as they relate to the proposed 16 mile grant-in-aid ATV trail which skirts the south side of Hartley Lake and uses the shoulder of Itasca County Road 53 and the East Scooty Lake Road to reach the Little Moose Trail.

As a strong advocate of managed trails, both motorized and non-motorized, I am delighted the DNR is working with local clubs to establish ATV grant-in-aid trails locally. I also understand the need to establish trails relatively quickly and easily. However, I have concerns that in the rush to establish trails this project has overlooked the potential problems and conflicts by routing the trail so close to seasonal cabins and upon roadways.

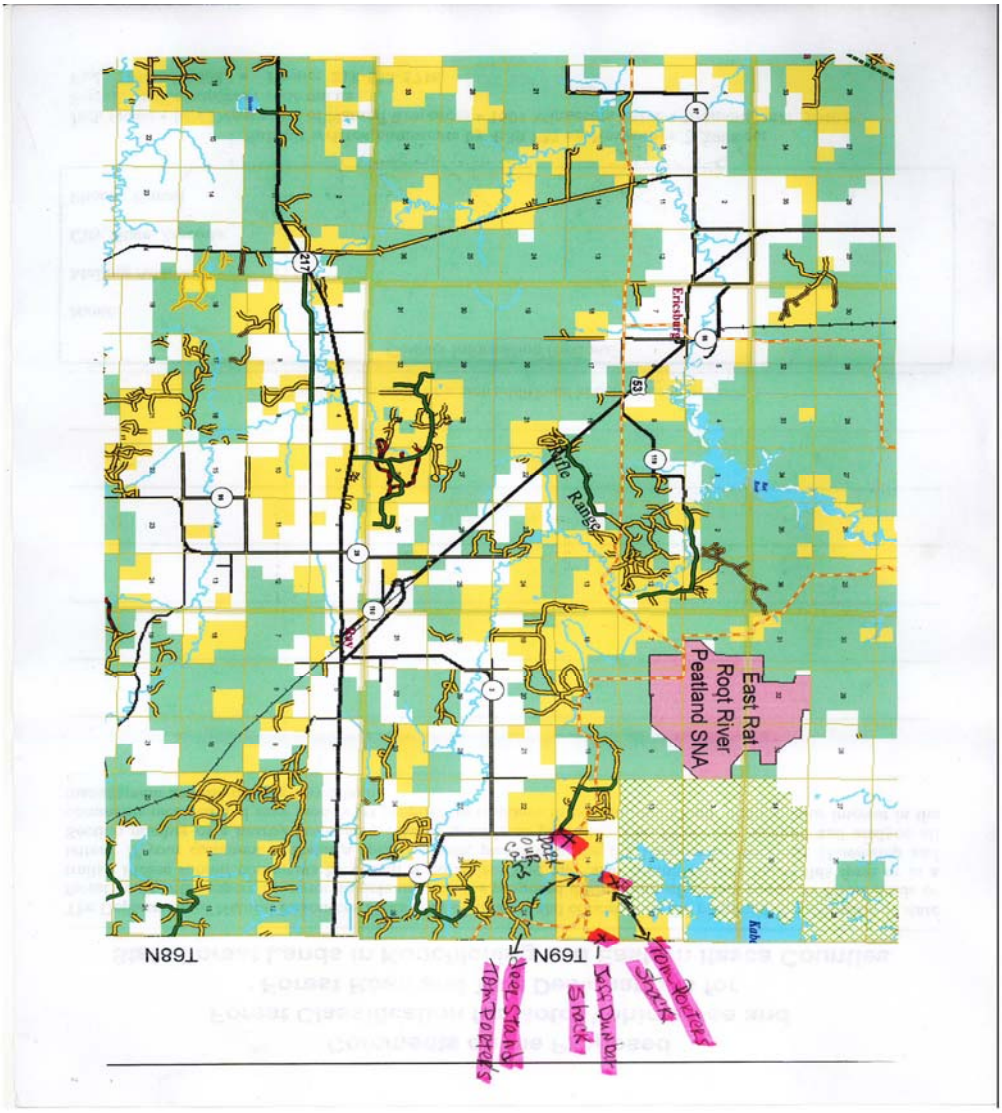
I think everyone would agree that the proposed trail will get significant use, especially when so few managed trails are presently available. But it will also significantly increase the "noise pollution" occurrence above the current local user level creating conflicts with local cabin owners and residents. The proposed trail is directly adjacent to these lakeshore lots parallel to a new road the residents recently put in. It would be much more advantageous to have the trail farther back from the lakeshore lots to minimize these problems. I believe a reroute of this portion of the trail would be readily easy to implement, especially with help of some of the local residents. Having the trail moved back would still allow easy access for local ATV users to the trail but decrease the impact on their properties. The reroute would still be on Itasca County land so there would be no easement issues.

Secondly, the use of the Hartley Lake dam/bridge not only adds to the noise factor by acting as a conduit of noise being broadcast over the lake, but the decking of the bridge is too narrow for vehicles and ATVs to cross at the same time when meeting each other. This would be a safety issue and the same could be said for use of the East Scooty

	Lake roadway. Also, use of the roadway hardly adds to a trail experience. Its only advantage is that it is easy to accomplish. For this leg of the trail, I would propose that the trail be relocated to address these problems by using the Prairie River Trail to the south and building an ATV bridge over the west fork of the Prairie River and connect with existing trails which run on the west side of Wolf lake to make the connection to the Little Moose Trail. The DNR's Forest Management Plan map of ATV usability of these trails and forest roads indicates this route is suitable for ATVs, however, I am certain some of the existing trail from the Wolf Lake dam to the Little Moose Trail would need improvements. To make this connection of existing trails there is also one low area to cross north of County Road 53 but it is relatively short and, I believe, would be easy to boardwalk. This suggested route would create much more of a true trail experience for the trail user versus using existing roadway as in the current proposal, as well as be much safer. Because ATV trails have had difficulty in being established because of their controversial history, it would seem advantageous to plan these early trails with most of the local issues in mind to avoid a perpetuation of these controversies. I believe this proposed trail could be a shining example of how clubs, local residents, and the DNR worked together to have a great, scenic, low impact trail, one which people can point to in the future as a standard to be met. Granted it may have to be done in stages but a commitment would be necessary to obtain backing. Some people have their cabins as a place to recreate, but many also have them as a place for some solitude and quiet besides recreating. I would hate to see the trail destroy that need of many and, therefore, would recommend the changes I have suggested be given strong consideration and evaluation. In frankness, I have property that will be impacted by the trail but would be very supportive of the trail provided it addressed these needs. I would dedicate myself to working with the Balsam Trailblazer's Club, governmental agencies, and local residents to facilitate the development of the trail route or other routes that would address these local issues.
	Kane, Kristi
23

	the depends on the Northern Minnesota forests. >>

48	I am writing to comment on the draft plan to close certain forest lands to motor vehicle access. Specifically, I am opposed to a proposal dated August 25, 2008, that seeks to prohibit motorized vehicles in the area around White Porky Lake. The area is described on page 8 of the draft proposal: White Porky Closed Area The proposed White Porky closed area surrounds an existing hunter walking trail in the area around White Porky Lake in T59N - R25 and T59N - R24W. The proposed area covers 2,460 acres, of which 1,140 acres are state forest land and 1,242 acres are county forest land. Although I reside in St. Paul, I value the opportunity to spend time with my father (who lives on King Lake) enjoying the outdoors. We have on numerous occasions made use of off highway vehicles (OHV) near his home and elsewhere. Such vehicles facilitate and contribute to our enjoyment of Minnesota's outdoors. With this perspective in mind, I request that you not close the area to OHV. If you and your colleagues feel some land use restriction absolutely is necessary, then in the alternative I request that you at a minimum permit motorized vehicles in this area for hunting- and trapping-related uses. I appreciate the opportunity to share with you my concerns regarding this matter. Thank you for considering my views.
	Oberstar, Duane
29 30	My concern is for the proposal to close to 4x4s (ATVs) the land west of King Lake – more specifically Section 31 – T59N – R24W. I have hunted there for 20 yrs. I believe I and the public need access to this area to retrieve big game. There is no damage to the trails by 4x4s. There are many miles for all hunters to grouse hunt. I do not believe the state should maintain a trail just for a walking trail only. A game farm could provide what those people want. Hauling portable stands to this area is difficult. Use of a 4x4 for this makes it a workable situation.
	Pass, Carl
31	My vote is to keep public lands open for atv and motorcycle use.
	Porter, Thomas
32 33 34	We are writing to you in concern for a portion of the Arrowhead Trail in Sections 13 & 14 – T69N – R22W that we can use before & during hunting season to get to our hunting shack and hunting stands. It is designated "no motorized" use except snowmachines. It is the only access we have to our shack and stands. Because of my age of 66, I can't walk to and from my stand from where I have to park my ATV. I'm too old to cut a new trail and besides that, I'm not allowed to make or cut down any trees. I've had my stand there for 25 years. If I shot a deer at my stand there is no way I could drag it to my ATV that's parked on the legalized trail. I've always used this trail to get to my stand and get my deer. Now you're saying we can't use it. We have always maintained this trail for our use. We have never misused it in any way. We have groomed and cut up trees that were in the trail. Is there anyway that this restriction could be lifted for a period of time, like before and during deer season. We would like to groom the trails and remove blow down trees and also check on our stands to see if we need to make repairs. I don't know when the "no motorized vehicles" came into effect. But I would have done something about it then. When it was designated a snowmobile trail, we we're told then it would be a multi use trail and we could use it then with our ATVs until snowmobile season started. While we were hunting Keith Ali run his dog sled team right past us. We didn't complain, it was just as much his trail as ours. That's what this trail is for – multi use. The only time we use this trail is hunting season and we got to our friend (Jeff Dunbar – Section 13) for a traditional meal. We do this every year. We don't tear up the trails at all, we try to keep them in good shape. We can't make new trails because of the restriction of cutting down trees. So we are kinda stuck to getting to our shack without use of the Arrowhead Trail, and getting to our stands. So we would like access of that portion of the trail for a short time before and during deer season if that's possible. We don't think we're asking too much for the use of a small portion of the Arrowhead Trail to get to & from our shack & stands. We will appreciate anything you can do for us in this allotted time frame to use the Arrowhead Trail.



Pemberton, Al (Red Lake Band of Chippewa Indians)

RED LAKE BAND
of CHIPPEWA INDIANS
Department of Natural Resources
P.O. Box 279, Red Lake, MN 56671

Phone 218-679-3959
Fax 218-679-2830

Memorandum

To: Jack Olson (MN DNR – Trail and Waterways)

From: Al Pemberton (Red Lake DNR - Director)

Date: 10/29/08

Subject: Koochiching/Itasca East ATV/OHV Plan

Dear Jack Olson,

35 Upon review of the Koochiching/Itasca East Forest Classification and Route Designation Proposal, the Red Lake Band of Chippewa (Band) has identified two areas of concern. Attached are two maps of locations of concern (T – 159 R – 28, Section 8, 17) and (T -157 R – 29, Section 11, 12). The Band believes the trail segments depicted by orange circles will promote unauthorized use and/or trespass on Red Lake Tribal Land (indicate by Red). The Band requests that these trails segments should be eliminated or rerouted, as the only way to currently access these trail segments is via Red Lake Tribal Land.

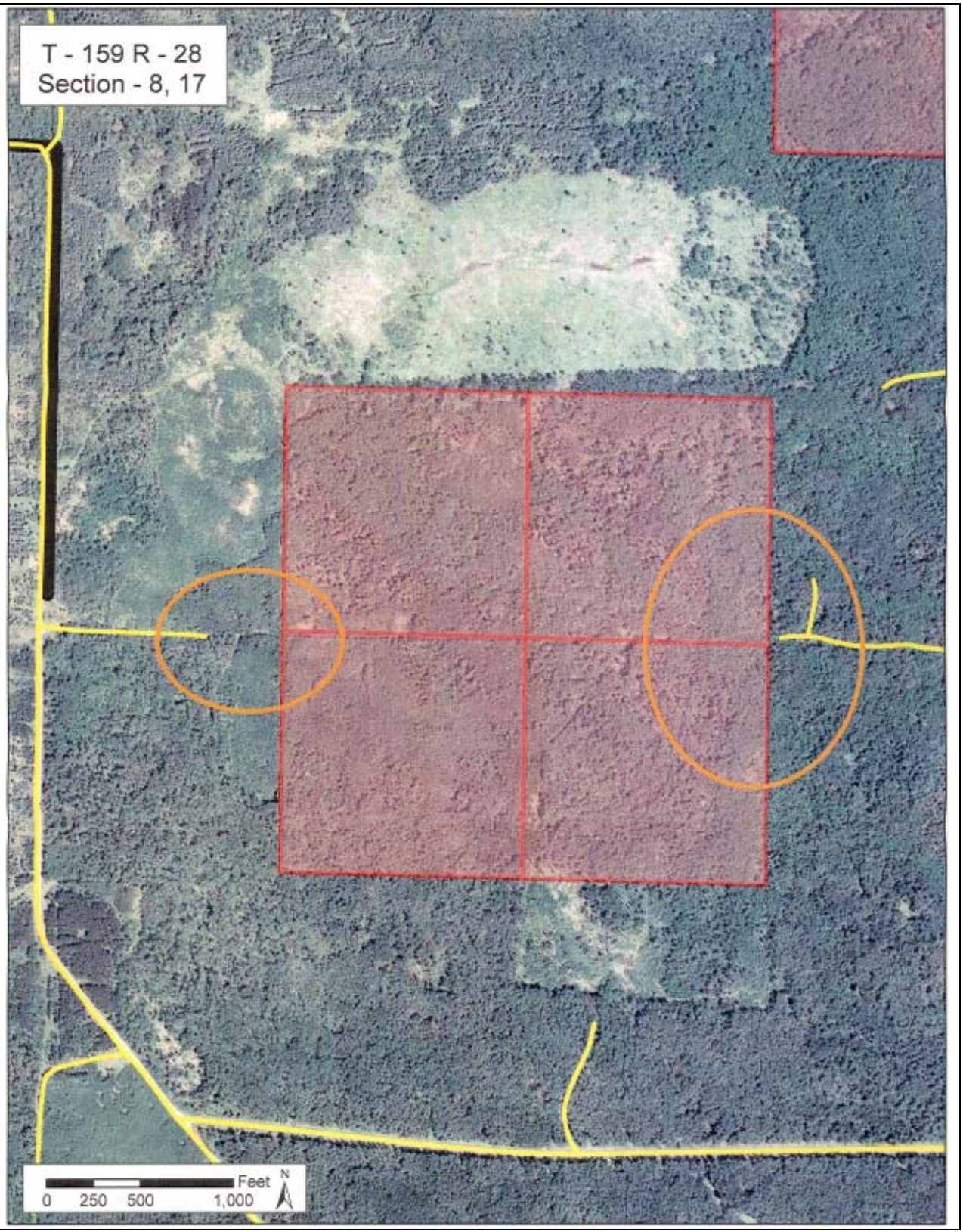
T. 159N. - R. 28W. Section 8, 17 - Red Lake Tribal Land
Specifically, the Band requests that both the east and west trail segments should be eliminated or rerouted, as the only way to connect between these trails is via Red Lake Tribal Land (see attached map T – 159 R – 28, Section 8, 17).

T. 157N. - R. 29W. Section 11,12 - Red Lake Tribal Land
Specifically, the Band believes that all four trial segments highlighted by orange circles should be eliminated or rerouted, as the only way to connect these trails is via Red Lake Tribal Land (see attached map T – 157 R – 29, Section 11, 12).

It should be noted that non-members caught on Red Lake Band Lands shall be subject to prosecution for trespassing in the tribal court, and shall also be subject to forfeiture of equipment at the time they are apprehended.

Sincerely,

Al Pemberton
Director
Red Lake Department of Natural Resources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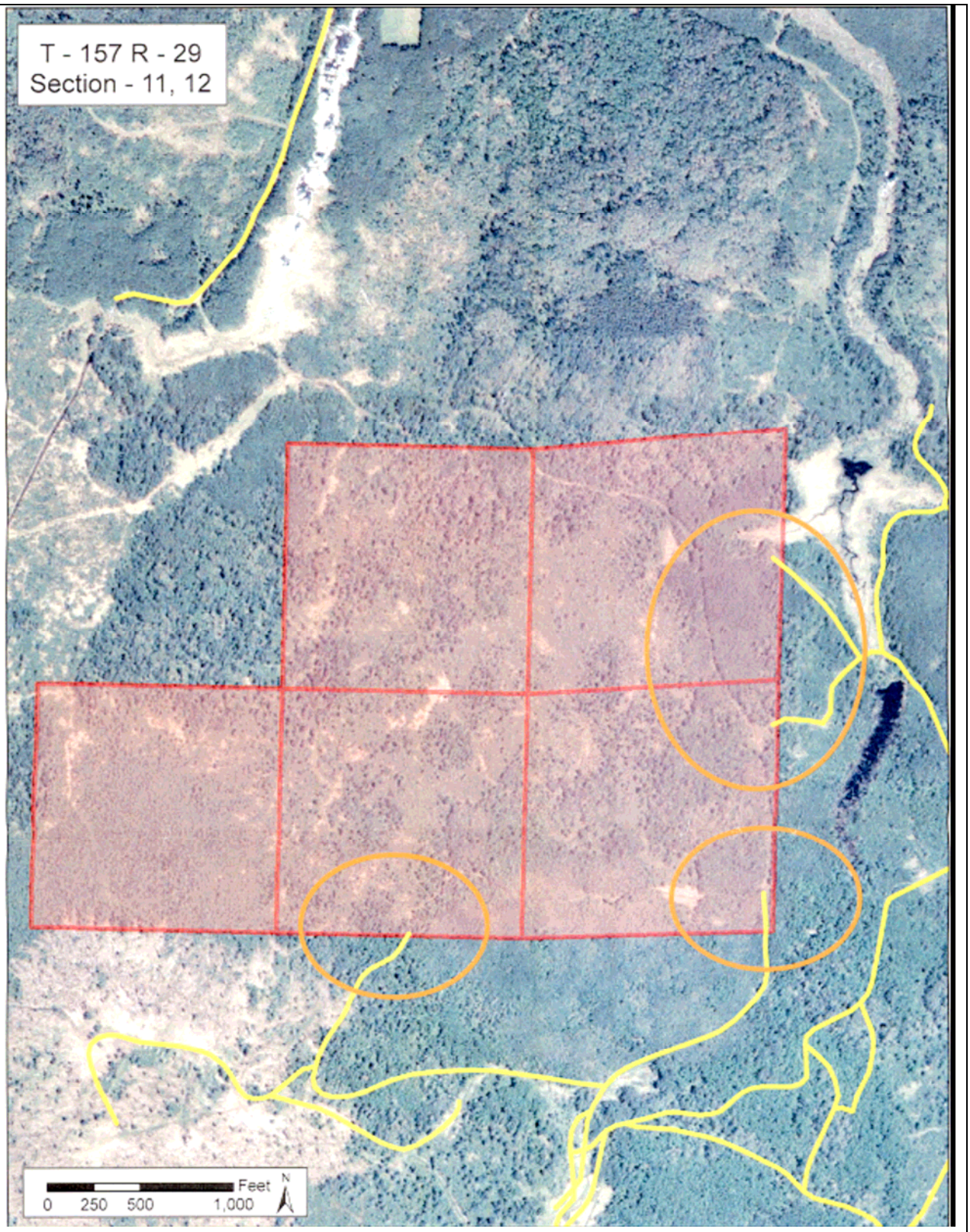


Salminen, Michael

AMENDED
7/28/08

July 25, 2008

This letter is public record
to be used as such

Mr. Perry Leone
District Forester
Itasca County Land Department
1177 LaPrairie Avenue
Grand Rapids, Minnesota 55744

Re: Proposed "No Motorized Vehicles" Area In Sec. 30,31 in T59, R24; Sec. 25,26,35,36 in T59, R25, Itasca County, Minnesota

Dear Mr. Leone:

Thanks for meeting with me at your office July 24, 2008. You provided me with a map and explained that the Minnesota Department of Natural Resources (MDNR) and Itasca County are collaborating on a proposed plan to establish a no-motorized-vehicles area in the referenced lands.

36

You mentioned a party is requesting repositioning of the MDNR gate presently located at the junction of Lum Lake Road and White Porky Lake Road in Section 25, Township 59, Range 25. The request to move the gate south about ½ mile is adverse to the original intent of the MDNR, as well as current intent to limit motorized access to the area.

Attached is a copy of the 1984 MDNR executed "White Porky Lake Aspen Management Plan" that clearly states "This road will be gated and vehicle traffic allowed only for timber sales and administration."

If the MDNR moves the gate, it negates the intent of their Forestry Wildlife Plan that functioned for the past 24 years, with the gate at its present location. Moving of the gate would increase, rather than restrict, motorized vehicle access to the area under consideration.

My comment is to leave the MDNR gate at its present location, and enforce the intent of its adjacent sign that forbids motorized vehicles use of the gated road.

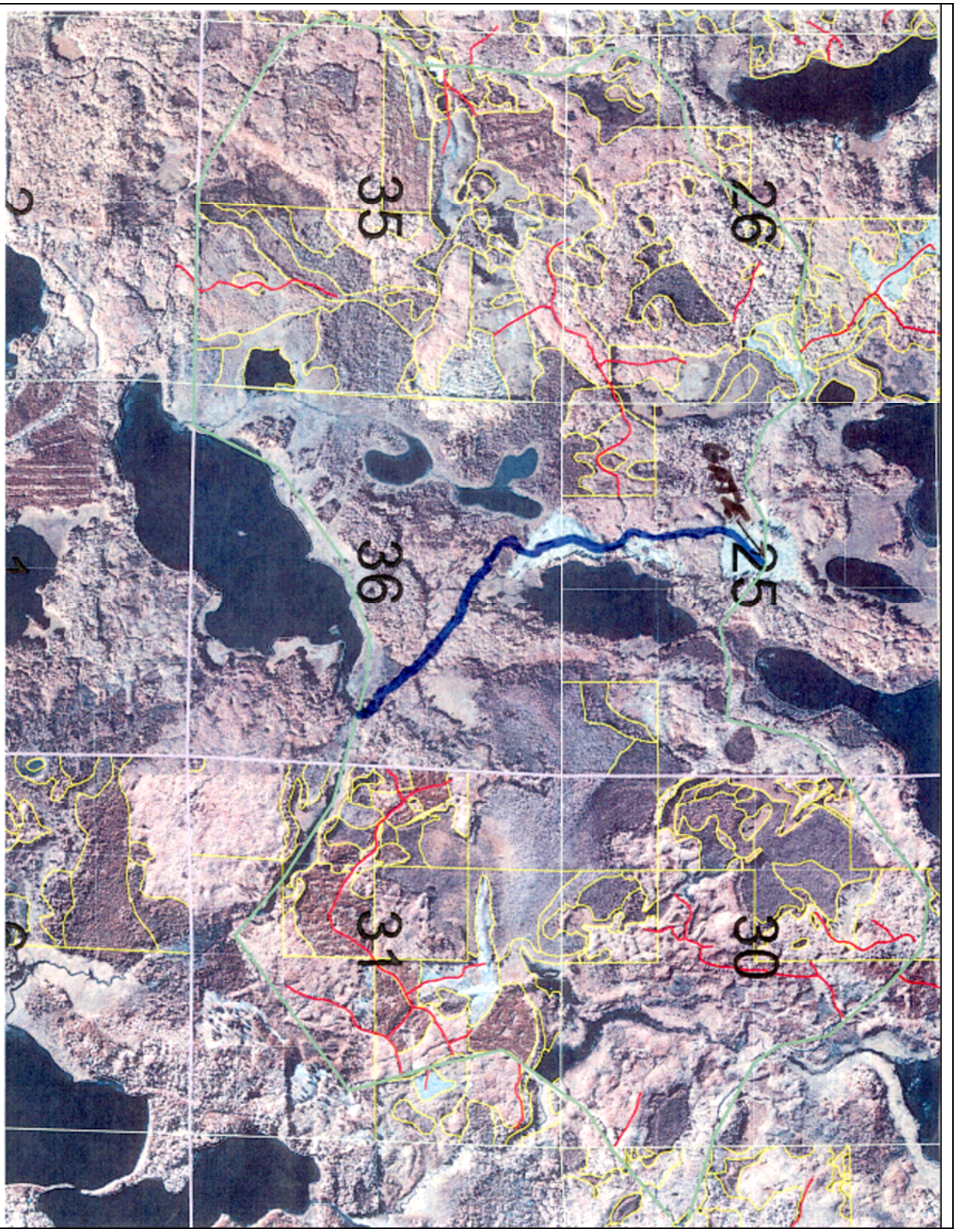
Yours for integrity in government, I am,

Sincerely,

Michael A. Salminen

Michael A. Salminen
P.O. Box 457
Bovey, Minnesota 55709-0457
(218) 245-2827

copy to: Mr. Perry Loegering, MDNR Area Wildlife Manager, Grand Rapids
Mr. Jim Lutgen, MDNR Forestry, Grand Rapids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DRB: 169

Minnesota Department of Natural Resources

FOREST GAME HABITAT DEVELOPMENT
PROJECT PROPOSAL

40-7-84

Name of Forest Link Lake District George Washington Project Location: T. 59 59 R. 24 25 S. 31 25,36 County Itasca

Local Name (Deer yard name and/or no., etc.) White Porky Lake Aspen Management Plan

Project Initiated by: Game XX Div. L & F XX USFS ____ County ____ Other ____

EXPLANATION OF PROJECT

This project is a 10 year aspen management plan. A native soil road is required to access some of the timber. This road will be gated and vehicle traffic allowed only for timber sales and administration. Wildlife, assisted by Forestry, will do the road surveying work. Road construction will be contract, administered by Wildlife. Nine wildlife openings will be developed following the timber sales. Wildlife will assist with timber sale layout.

	Total Acres	Land Ownership in Miles, Acres, and Estimated Costs								Total Cost
		State	Cost	Federal	Cost	County	Cost	Private	Cost	
Commercial Sale	272	272	600							600
~~Dozing~~ Opening Prep.	14	14	2,800							2,800
Shearing, KG Blade										
Prescribed Burn										
Hand Cutting										
Chemical Treatment										
Firebreaks (miles)										
Road Access (miles)	1.3	1.2	3,690			.1	310.			4,000
Planting-Seeding	15	15	650							650
Subsidy										
Sub Total		State	7,740	Federal		County	310.	Private		8,700
Est. Total Costs						Public Lands	8.700	Private Land		8,700

DESCRIPTION OF AREA

TREES			SHRUBS		GROUND COVER	
Species	Size[1]	Stocking[2]	Species	Density[2]	Species	Density[2]
Aspen	P-ST	M-G				

1 S = Sapling P = Pole ST = Saw Timber
2 P = Poor M = Medium G = Good

MATERIALS NEEDED

1 2 - 36"x22' CMP	$ 400	3	$
2	$	4	$

APPROVAL

	District	Area	Region	Date
Wildlife	[signature] 6/19/84	[signature] 6/19/84	[signature]	6/23/84
Forestry	[signature] 6/[illegible]	[signature]	[signature]	6/[illegible]/84
USFS			Supervisor	
County			Land Office	
Private				

Sershan, Frank & Brad Ribar

37 I spoke with you this morning. I am one of the owners of a 40 acre parcel on the northeast corner of Coon Lake just south of Larson Lake in Itasca County. We have a trail that cuts through our property to Larson Lake and another one that goes down to the Coon Lake access. We bought the property 2 years ago from Forest Capital and still let the public run their ATV's on our property as long as they respect it.

38	We have a "Right of Way" permit with Forest Capital and a key for the gate. It is a privilege we really appreciate. The "managed" use of the trails on our 40 will remain as long as ATVers also appreciate our property. We would encourage the DNR to do the same type of management in the "Legacy Area's" 10,300 acres. Keep all areas open to ATV's unless posted closed. Close them in areas where heavy logging occurs and forest roads are damaged by ATV's. Post those same areas closed when heavy rains are adding to road and trail problems. The total closing of the "Legacy Area" would compound the problems in areas adjacent to it because of the higher concentration of ATV's in those areas. It would have been preferable to have more time than one week to study the Forest Classification and formulate additional comments as we share your concerns. I think I have stated the areas I am most concerned with. Better notification of landowners in the affected areas would be appreciated, as we are stewards of the land as well. We were fortunate to find out by 'word of mouth'. We appreciate the efforts of the DNR staff especially at the Bigfork meeting. We thought they listened well and showed a genuine interest with our concerns with the Forest Classification process. Keep up the great work and keep us informed.
	Silvis, Michael
39 40	Larson Lake Area A. There needs to be extensive safety signing on the north/south Main Haul Road. B. To help relieve safety hazards open up some of the logging roads that are not in use. C. Make loops back to Bass / Larson / Lost campgrounds. D. Also, there is a need for a trail to “get” to Thistledew ATV Trail from Bass /Larson Lake campgrounds.
	Smith, Tony (Balsam Trail Blazers ATV Club)
41	The proposed atv trail will be a first in Itasca county and will open many opppertunities for spur trails and loop trails. A lot of hard work has already gone in to planning the trail and has met some road blocks,but I am sure they will be worked out. The local people that I've talked to are very much in favor of the trail . They say there is not any where to ride or they do not know where to ride. We have been working with the Hartley Lake Association with their complaint of noise and are close to agreeing on a reroute.
	Spencer, Darrell (Backcountry Hunters and Anglers – MN Chapter)

Backcountry Hunters and Anglers
(Minnesota Chapter)

Darrell Spencer
MN Chapter Spokesman
4826 Drake Rd.
Duluth, MN 55803
October 14, 2008

Jack Olson
DNR Trails & Waterways
1601 Minnesota Drive
Brainerd, MN 56401
jack.olson@dnr.state.mn.us
218-833-8716

Dear Sir:

Thank you for the opportunity to comment on the Draft Plan for forest classification of State Forest lands in Koochiching and eastern Itasca counties. Backcountry Hunters and Anglers (BHA) is a sportsmen's conservation group that seeks to ensure America's outdoor hunting and angling heritage through education and work on behalf of clean water and wilderness.

Minnesota BHA comprises a growing and diverse organization of both urban and rural members from all over the state. A crucial common denominator in the philosophies of all BHA members is a goal to conserve the forests, mountains, prairies, and waters that support our chosen way of life. As our national chairman, Mike Beagle, says: "We believe in keeping public lands healthy and accessible. We believe in managing wildlife as a public trust and all native wildlife as a priceless resource. We believe in protecting the big, natural areas and natural functions that support our hunting and fishing heritage."

42 That said, as you surely know, many sportsmen and women are becoming increasingly concerned about growing threats to the future of hunting and angling opportunities on our public lands resulting from habitat loss and degradation due to excessive road building and off-highway vehicle (OHV) overuse and abuse.

43 With this in mind, Minnesota BHA's position is that there should be no "managed" forests. As everyone knows, unsustainable habitat damage is occurring state and nationwide from OHV overuse and abuse, and the DNR does not have an effective mechanism to enforce current laws or fund the necessary repair work.

44 We are also asking the Department of Natural Resources (DNR) to close all habitat-damaging and "unclassified" trails on state forest lands in the planning area and any other unnecessary or environmentally damaging routes, and to refrain from building any new trails. Additional support for our request is included in the information that follows:

- Former Forest Service Chief Dale Bosworth called off-road vehicle (ORV) abuse one of the "four threats" to the health of public lands.
- Today in America there are 7 million miles of roads; in our National Forest System alone, over 460,000 miles—enough to circle the earth 18 times.[1] Just to put that figure into perspective, the Interstate Highway System is only 43,717 miles long.
- Meanwhile, at least 60,000 miles of unauthorized ("unclassified") routes zigzag through public forests.[2]
- Poorly managed OHV use damages hunter, angler, and other quiet-user experiences, adversely affects wildlife habitat and behavior (including big game and fisheries), and impacts water quality.
- According to the Minnesota DNR, "It has been well established in Minnesota that ATVs are traversing wetlands on public lands, and that sediment from eroding slopes damaged by ATV traffic is entering wetlands and streams."[3]
- According to a 2000 Minnesota DNR "Awareness and Satisfaction Survey," the statement that survey respondents *disagreed* with most was: "The DNR should establish more sites on public land for motorized off-road vehicle recreation."[4]
- According to a 2002 "Minnesota Deer Hunters' Opinions and Attitudes Toward Deer Management" survey, the typical Minnesota firearms hunter hunted with a group, used a tree stand at least some of the time, and *did not use an ATV*. Most hunted for the sport and to be with friends and family.[5]
- Multiple studies and surveys have shown that ATVs scare away big game and do not improve hunters' success.[6]
- The approach of sharing public land sounds reasonable, but in practice it has often failed. What usually happens is that those who prefer quiet recreation are driven from areas where off-road driving becomes popular.[7] So where's the multiple use?

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[1] Conservation Northwest. "Roads shrink wild areas." *Conservation Northwest*: Fall 2005, p.9
[2] Matthew Daly. "New Illegal Trail Rule Criticized." *Associated Press*: 11/7/05
[3] Minnesota Department of Natural Resources-Ecological Services Division. "Assessing the ecological impacts of ATV trail construction and use on public lands: factors to consider and a review of literature." *Internal Peer Review*: 10/3/02
[4] Minnesota Department of Natural Resources (DNR). "Awareness and Satisfaction Survey Results." *Bureau of Information, Education and Licensing*: June 2000, p.4
[5] Responsive Management. "Minnesota Deer Hunters' Opinions and Attitudes Toward Deer Management." Presented to the Minnesota Department of Natural Resources: 1/4/02
[6] David G. Havlick. *No Place Distant*. Washington, D.C.: Island Press, 2002, p.98
[7] Tom Meersman. "Trouble on the trails." [Minneapolis-St. Paul] *Star-Tribune*: 12/9/06

- Data shows that the people of Minnesota who do not use OHVs vastly outnumber those who do (even among deer hunters in the north central and northeast part of the state). Those who recreate in non-motorized ways on public lands outnumber those who ride OHVs in terms of both the number of people and number of recreational days, and Minnesotans react negatively to suggestions that the DNR should supply more OHV trails in public satisfaction surveys when questioned about how DNR should cater to recreation tastes.
- Studies show that on most public lands, approximately 90% of users are non-motorized. Meanwhile supply or opportunity, in terms of lands available in Minnesota, is close to three times greater for motorized than for non-motorized.[8]
- Renegade riders caught trashing the environment usually face small fines, seldom pay restitution and never lose driving privileges. The DNR doesn't enforce a 2005 law to keep the worst violators off ATVs, saying it doesn't have the money to do so.[9]
- Riders often use state-approved trails to illegally enter sensitive places. Nearly one in four tickets or warnings issued for riding in wetlands and public waters occurred near places where it's legal to go, the DNR's data show.[10]
- ATVs now represent the third-biggest claim on conservation officers' patrol time. Officers spend more hours checking on ATVs than they do on waterfowl and small-game hunting or snowmobiling. Yet the DNR Enforcement Division is roughly the same size as a decade ago -- a little more than 200 officers and supervisors.[11]

Kevin Biegler, a member of the executive board and past president of the Twin Cities chapter of Trout Unlimited says: "We're sick and tired of listening to ATVers cry about the need for more trails." They have 11,000 miles of DNR inventoried trails. "The state only has 1,900 miles of trout streams and one-third of them are not viable waters for sustaining recreational fishing."[12]

Other groups, like Minnesotans for Responsible Recreation and the Izaak Walton League, have spoken out against expanded ATV use in our state forests. "They call it managed, but it's really not managed at all. It's unmanageable," said Rick Fry, longtime Pequaywan resident and Town Board supervisor. "We're trying to convey to [the DNR and county] that we don't want this [network of trails up here]. But no one seems to be listening to us."[13]

The noise and smell of an ATV can alert game animals from a long way off, so your chance of seeing game from an ATV is very small. That same noise and smell that is chasing deer away from you is also chasing them away from any other hunters in the area

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[8] Minnesota state recreation use study: 2000.
[9] David Shaffer, Tom Meersman, and Glenn Howatt. "Renegade riders." [Minneapolis-St. Paul] *Star Tribune*: 9/15/08
[10] David Shaffer, Tom Meersman, and Glenn Howatt. "Renegade riders." [Minneapolis-St. Paul] *Star Tribune*: 9/15/08
[11] David Shaffer, Tom Meersman, and Glenn Howatt. "Renegade riders." [Minneapolis-St. Paul] *Star Tribune*: 9/15/08
[12] Lu Ann Hurd-Lof. "County attorney discovers loophole in ATV rules." *Park Rapids Enterprise*: 5/15/07
[13] John Myers. "Debate runs deep over ATV use in state forest." *Duluth News Tribune*: 6/17/07

-- this can create very hard feelings among hunters who used stealth and stalking skills to get into good habitat only to have game scared off by ATVs![14]

Midwest outdoorsman Tony Dean says that, "…For a few years, my wife and I…hunted the Cave Hills area in Harding County on an annual basis. We'd arrive early for pre-hunt scouting, but come opening morning, ATV riders carrying rifles would be out in full force. As a result, the deer would almost immediately abandon daily patterns…hunting from such a vehicle stretches the boundaries of fair chase, and interferes with other hunters."[15]

"Traditional hunters want a quality experience, but they are faced with ever-increasing negative impacts brought about by unmanaged ATV use on our public lands," says Stand Rauch, a lifelong hunter. "As ATV use grows unchecked, many hunters are being displaced from their most pristine and productive hunting areas on their national forests and critical wildlife habitat is being sliced into smaller and smaller pieces."[16]

45 We hope you will do everything in your power to help preserve our state forest and other public lands in their natural and wild state for future generations of hunters and anglers and other outdoors enthusiasts. Thank you again for the opportunity to provide comments on the Draft Plan for forest classification of State Forest lands in Koochiching and eastern Itasca counties.

Minnesota BHA recognizes that travel management planning for DNR employees is not an easy task and we appreciate your efforts. Thanks for making a difference.

Sincerely,

Darrell Spencer
Spokesman, Minnesota
Backcountry Hunters and Anglers
www.backcountryhunters.org
ds@leaveatrail.biz
218-724-4226

-Chris Niskanen: "The greatest threat to hunting isn't the animal-rights community, but hunters themselves who embrace comfort and convenience over a good pair of hiking boots."[17]

[14] Bureau of Land Management-Colorado (BLM-Co). "Hunting With ATVs-Responsibility or Regulation?" *BLM-Co* website (accessed 3/4/07): http://www.co.blm.gov/gra/gra-atvethic.htm
[15] Tony Dean. "Hunting, ATVs a bad combo." *Argus Leader*. 1/3/07
[16] Jason Kiely and Scott Kovarovics. "Now or Never: Getting a Grip on Off-Road Vehicles." *New Mexico WILD!*: Spring 2004, p.17
[17] Chris Niskanen. "Let's Abolish Hunting Birds From Vehicles." *St. Paul Pioneer Press*: 2/8/98, p.15C

Strand, Lynn

I hope this note gets to you before your meeting. I have been in communication with my son, Peter Strand, who has written a letter that fully expresses the view of my wife, Janice, and myself with regard to the ATV trail.

	I also talked with Bruce Hartman yesterday and it sounds hopeful that you will find a way to keep the trail farther back from the lake and not depend on the bridge and public road. I applaud your efforts as this piece of paradise has been dear to our family through four generations.
	Strand, Peter
49	I am writing this letter to make you and the DNR aware of my concerns regarding the proposed ATV trail near Hartley Lake. I am an owner of the property at 46815 Hartley Lake Road. My understanding is that the current proposal has the trail skirting the new private road that all of the residents on the east side of the lake just put in this summer. I also understand that the proposed trail will cross the bridge/dam. Then, it will go along County Road 53 to East Scooty Lake Road. I also understand that there is an alternative solution that has been proposed that would put the trail back on the Prairie River trail. My family and I are avid outdoors people. We hunt, fish, and use these trails for biking and running. While I don't own an ATV, I do have neighbors that do and have no issue with the use of ATVs on designated trails. For the record, I am opposed to the trail proposal where the trail skirts our private road and crosses the bridge/dam. Here are some of the reasons: • No matter how much oversight, the riders will access and use the private road. It is the natural extension of coming over the current bridge. • Increase in traffic near the bridge. While most ATV riders are respectful, there are enough that do not slow down when they are on roads. During the summer of 2007 some ATV riders were driving through the shallow end of the pond below the bridge. My kids play and fish around the bridge and this is a serious concern. • Noise – It will be more difficult to go for a walk or enjoy our cabin without the background noise of ATVs. • Dust/Sand – We already do not mountain bike on Scooty Lake Road because it is used by significant numbers of ATVs and when they go by it is very uncomfortable. This dust is a significant issue that currently does not exist along the East side of the lake. • Future growth – While this trail may see moderate use at the beginning, as it becomes better known, there will be constantly increasing use. We have not had a break-in for many years and I have a concern that with more traffic near vacant cabins, that the opportunity and probability of illegal activity will increase. I am an advocate of trails and do not want to suggest that there shouldn't be a place for ATV riders to use their equipment. However, the use of these trails should not impede the enjoyment our lake property. I strongly support the alternative that pushes the trail back away from residential and seasonal homes.
	Strand, Russ (Trails End Chapter of the MDHA)
46	I hope I am still timely with the comments. As president of the Trails End Chapter of the MDHA, I want to thank the DNR for allowing the "end users" of the trails the opportunity to be part of the overall ATV trail planning. My personal comment concerns the designation of tracked only trails if need be. This classification would be in lieu of trail closure

RESPONSE TO TOPICS OF CONCERN

Related comments were grouped together into topics prior to developing an agency response. Some topics are of a general nature (e.g. management objectives for State Forest lands) while others are site specific (e.g. White Porky Hunter Walking Trail). Comments that expressed a concern or opinion but that were not directly pertinent to the classification or road/trail use designation were assigned to a miscellaneous category.

For each of the topics a succinct summary of the concerns was prepared. This is followed by a list of all the comments that were grouped under the topic (with hyperlinks to the original comments). The agency response to the topic is then presented.

Access to Cabin Leases

Summary of Concerns

Concerns about continued motor vehicle access to existing cabin leases primarily on Koochiching County and Forest Capital properties. Some lease holders have to cross State Forest land to access their cabin lease site.

Comments on This Topic

12, 18, 19, 33

Response to Concerns

The planning team noted the location of all cabin leases on county or Forest Capital lands and ensured that there was motor vehicle access of some sort to each lease site. The access may simply be a non-designated access route on *managed* forest land that is open to motor vehicle use subject to prohibitions on rutting, erosion, or damage to trees. The planning team is concerned that some of the routes used to access cabin leases are not capable of sustaining motor vehicle use. The users often do minor maintenance or improvement on access routes. Conditions on some access routes would warrant a proactive closure if they were not being used for access to lease sites.

See also response to site specific comments on using Arrowhead Trail to access cabin leases.

Access to Private and Tribal Lands

Summary of Concerns

The Red Lake Band is concerned that access routes on State Forest land may encourage unauthorized use or trespass on adjacent tribal land. Private land owners are concerned about motor vehicle access to their land within the Larson Lake limited area.

Comments on This Topic

35, 37

Response to Concerns

The routes mentioned in the Red Lake Band comment will be non-designated (access) routes on state forest land classified as *managed* with respect to motor vehicle use. These routes will not be shown on state forest user maps and will not be signed as a forest road or trail open to public use. The non-designated routes are shown on the route designation map simply to show that the route exists on the ground and that the planning team addressed the route. The disclaimer on the designation map states that tribal lands are closed to non-band members except by special authorization from the tribal council. When using non-designated routes, it is the user's responsibility to know the land ownership pattern. The Red Lake Band could post 'no trespassing' or similar signs where the non-designated route enters tribal land.

The Larson Lake limited area will not affect use of motor vehicles on private lands within the area. The landowners use of the route covered by the 'right of way' permit and gate key will not be affected by the limited classification. The landowner will not be able to use nondesignated routes on State Forest land in the limited area except for those uses allowed under the hunting and trapping exceptions (*MN Statutes 84.926*). The landowner can continue to allow the public to use routes on their land assuming the public can legally get to the route.

Enforcement

Summary of Concerns

The comment is related to changes in allowable uses of motor vehicles and enforcement while users are learning about the changes.

Comments on This Topic

06

Response to Concerns

The DNR acknowledges that the changing rules and routes for motor vehicle use on state forest lands can be confusing. The DNR is committed to clearly signing and mapping the roads and trails that are designated and managed for motorized use. When using non-designated and unsigned routes in *managed* forests or when operating a vehicle as allowed under the hunting and trapping exceptions (*MN Statutes 84.926*) it is the vehicle user's responsibility to know the land ownership pattern and the motor vehicle use policies that apply. The DNR will provide educational materials related to the safe and responsible operation of motor vehicles on state forest lands. There is a learning period with any new rule and enforcement often starts with an educational phase. Clearly illegal vehicle operation that results in excessive or intentional environmental impacts will be subject to enforcement action.

Environmental Impacts of Motor Vehicle Use

Summary of Concerns

These comments express conflicting opinions about the severity of motor vehicle impacts on soils, vegetation, water, and quiet.

Comments on This Topic

03, 11, 30, 47

Response to Concerns

The DNR acknowledges that motor vehicle use and all recreational activities have the potential for unintended environmental effects. With proper trail alignment, design, construction, and regular maintenance, the DNR believes that it can provide sustainable roads and trails on state forest lands. This involves the use of stable, naturally shaped, engaging, and narrow OHV trails that encourage relatively slow travel and highlight natural features. Hardened trail treads will be employed where native soils cannot resist displacement and trails will be located to minimize disturbance to surface water, wetlands and other sensitive natural features. Regular road and trail monitoring, maintenance, and enforcement are intended to help ensure that designated routes do not fall into disrepair or generate unacceptable social or environmental impacts. The planning team considered environmental impacts when designating roads and trails for motorize use.

Some comments mentioned the extent or density of roads and trails designated for motor vehicle use and the noise and physical impacts that extend beyond the roads and trails. The DNR does not have a trail density standard for state forest lands. Uncertainty exists regarding the precise relationship between road/trail density and effects on various species. A direct cause-effect relationship has not been established for most species; nor have threshold density values beyond which specific impacts can be anticipated. The effects of trail density on human forest users are even less well understood, with different users exhibiting widely varying levels of tolerance for other recreational uses. Planning teams can consider trail density when making designation recommendations and can use analyses of road and trail density. The effect of the proposed road and trail designations will be a net reduction in the mileage and density of road and trails available for motor vehicle use on state forest lands.

Motor vehicle operation in waters and wetlands is the source of much of the negative public reaction to use of vehicles in forested areas. Existing state law (MN Statutes 84.773, Subd. 2) prohibits OHV use in a manner to carelessly upset the natural and ecological balance of a wetland, or in a manner that impacts a wetland in violation of the Wetland Conservation Act. State rules (MN Rules 6100.1950, subparts 6 and 7) prohibit motor vehicle operation on unfrozen waters or in a manner that causes rutting. The DNR's motor vehicle management, education, and enforcement efforts are designed to minimize impacts on waters and wetlands while allowing adequate public access to and enjoyment of forest lands.

Forest Classification

Summary of Concerns

Conflicting comments on the preferred classification of State Forest lands with respect to motor vehicle use. Some favor the *managed* classification for all lands and one opposes the use of the *managed* classification anywhere.

Comments on This Topic
43, 31, 38
Response to Concerns
There is no motor vehicle use classification scheme that will fully satisfy the varying public opinions on use of motor vehicles in state forests. The complex rules and laws related to forest classification is indicative of the diversity of public opinion. The DNR feels that the proposed classifications are justifiable given resource conditions and use levels in the planning area. See the response for the White Porky area.

Hunting and Fishing Access

Summary of Concerns
Statements of support and opposition to use of motor vehicles to access hunting and fishing areas in State Forests.

Comments on This Topic
02, 10, 11, 19, 24, 26, 30, 34, 42
Response to Concerns
The DNR recognizes that most hunters use some type of motor vehicle (HLV, OHV, motorboat) to access forest lands and waters for hunting and fishing. The DNR also recognizes that many hunters desire to hunt in areas away from motor vehicle disturbance. There is no approach that will satisfy everyone. The attempt is to provide a mix of opportunities.

Conflicts between motor and non-motor recreation users do occur. The DNR manages State Forests within the policy guidelines established in state statutes. The statutory policy for State Forests is *multiple use, sustained yield* management of forest resources. Recent legislation that allows retention of the *managed* motor vehicle use classification for state forest lands north of US Highway 2 and the statutory provisions allowing certain hunting and trapping related motor vehicle use on *managed* and *limited* state forest lands establish public policy favoring motor vehicle access to state forest lands for hunting. State forests are actively managed to provide a range of goods and services, including outdoor recreation. State Forests are not, by statutory definition, designated wilderness or solitude areas. They host a mix of commercial, industrial, and resource management activities that are generally inconsistent and incompatible with wilderness or a "solitude-like" experience (e.g., timber harvest, motorized recreation, wildlife habitat manipulation, mining, prescribed fire, tree planting, fuelwood and bough harvest, etc). State Forests are roaded and accessible, and have traditionally hosted a mix of motorized and nonmotorized recreational opportunities. The multiple use management policy does not require that all uses be allowed on every acre of forest land. It allows a mix of management emphases across the State Forest system. State parks, and other DNR management units such as Wildlife Management Areas, State Trails, and Scientific & Natural Areas, have different statutory management policies and provide better opportunities to achieve "solitude-type" experiences.

The plan is to classify forest lands surrounding existing hunter walking trails in the Hartley Lake, McDougall, Peloquin, and White Porky areas as *closed* to motor vehicle use to provide non-motorized hunting opportunities on state forest lands.

Site Specific Comments

Arrowhead Trail

Summary of Concerns
Comments related to ATV use of a portion of the Arrowhead Snowmobile Trail in northeastern Koochiching County to access cabin leases on county forest land during the big game hunting season.

Comments on This Topic
19, 32
Response to Concerns
The DNR agrees that a portion of the Arrowhead Trail and a GIA snowmobile trail in the area can sustain some hunting related ATV use and that these trails are probably the best ways to access the cabin leases mentioned in the

comments. The DNR will treat the portion of the Arrowhead Trail from the center of section 17 – T69 – R22 to the GIA trail in section 13 as a non-designated access route during the non-snowmobile season. The GIA trail south of the Arrowhead Trail will also be treated as a non-designated access route. This will allow motor vehicle operation on these routes, subject to the prohibition on causing ruts, erosion, or damage to trees. Signs prohibiting motor vehicle use on these routes (i.e. 'No Motor Vehicles except Snowmobiles) will be removed.

Balsam Lake Trail

Summary of Concerns

Comments generally supporting the proposed Balsam Lake ATV Trail but expressing concern with the proposed route near residences and on the bridge/dam in the Hartley Lake area.

Comments on This Topic

22, 23, 41, 49

Response to Concerns

The Itasca County Land Department, DNR, ATV clubs, and residents of the Hartley Lake area have identified an alternate route that addresses the concerns raised in the comments. The alternate route will be designated as an ATV trail.

Larson Lake Limited Area

Summary of Concerns

Several of the comments mistakenly object to 'closing' the area to motor vehicle use. Others suggest designating additional roads and trails in the area for ATV use.

Comments on This Topic

09, 27, 28, 37, 39

Response to Concerns

Some of the comments mischaracterize the proposed *limited* classification as a closure of the area to motor vehicle use. The Larson Lake State Forest Campground and the Bass Lake County Campground attract a significant number of recreational ATV riders to the area. The *limited* classification is intended to keep recreational riders on designated and signed roads and trails to prevent further rutting that has occurred on some existing routes under the existing *managed* classification. The majority of the land in the Larson Lake area is private industrial forest land. The private land managers could close their lands and routes to all public motor vehicle use regardless of the classification of state forest land in the area. Forest Capital Partners, the DNR, and Itasca County feel that identifying and signing roads and trails for ATV use (and precluding recreational riding on non-designated and unsigned routes) represents a logical and responsible approach to managing motor vehicle use in the area. It is anticipated that additional roads and trails will be designated for ATV use when the period of intensive timber harvest in the area ends.

The *limited* classification still allows some big-game hunting and trapping related motor vehicle uses on non-designated and unsigned routes in the area (*MN Statutes 84.926*). The *limited* classification will preclude some small game hunting and fishing related motor vehicle use in the area (comments 9 & 10). The Larson Lake *limited* area (and the smaller Hartley Lake, McDougall, Peloquin, and White Porky *closed* areas) affect about 5,000 of the 1.17 million acres of state forest land in the Koochiching / Itasca East planning area. It is not possible to accommodate all recreational uses on every acre of state forest land. The intent is to provide a diversity of recreational opportunities at different locations across the forest. Unfortunately, managing motor vehicle related uses will result in changes for some users.

Taconite Trail

Summary of Concerns

The comment requests that ATVs be allowed to operate on the Taconite Trail in the winter.

Comments on This Topic

20

Response to Concerns

The Taconite Trail is a legislatively designated State Trail with primary uses set in law and the trail management plan. The Taconite Trail is primarily a snowmobile trail. Changing the primary use is beyond the scope of this forest classification and route designation project. The current management direction recognizes and allows some

other motor vehicle use in the non-snowmobile season. Portions of the Taconite Trail route located on uplands, especially on lands managed by the Itasca County Land Department, are treated as non-designated access routes during the non-snowmobile seasons. This allows motor vehicle use on the route so long as such use does not result in rutting, erosion, or damage to trees. ATVs should not be using the Taconite Trail when it is being groomed for snowmobile use.

The broader issue of use of ATVs on snowmobile trails when the ground is frozen but there is inadequate snow to groom the trail for snowmobile use is also beyond the scope of this project. However this issue is being discussed as ATVs increase in popularity and the period with deep snow decreases.

Trail Connections to Grand Rapids

Summary of Concerns
Comment requests consideration for ATV trail access to Grand Rapids from the south.

Comments on This Topic
21
Response to Concerns
Such an ATV trail connection is beyond the scope of this project as there is very little state forest land in the area. The land ownership pattern in the area makes it more likely that the trail would be a GIA trail developed in cooperation with the county and private landowners.

White Porky Closed Area

Summary of Concerns
Comments opposing, supporting, and proposing modifications of the White Porky *Closed* Area.

Comments on This Topic
29, 36, 48
Response to Concerns
The Itasca County Land Department and the DNR will reduce the size of the *closed* area to center on the existing hunter walking trail and to recognize the motorized hunting access that has developed in the eastern portion of the White Porky area. The *closed* area will be approximately half the size that was proposed in the public review draft. The eastern portion will retain its existing *managed* classification.

State Forest Management Objectives and Uses

Summary of Concerns
Statements related to motor vehicle use on public forest lands and routes.

Comments on This Topic
04, 08, 25, 26, 31, 45
Response to Concerns
State forests are actively managed to provide a range of goods and services, including outdoor recreation. State Forests are not, by statutory definition, designated wilderness or solitude areas. They host a mix of commercial, industrial, and resource management activities that are generally inconsistent and incompatible with wilderness or a "solitude-like" experience (e.g., timber harvest, motorized recreation, wildlife habitat manipulation, mining, prescribed fire, tree planting, fuelwood and bough harvest, etc). State Forests are roaded and accessible, and have traditionally hosted a mix of motorized and nonmotorized recreational opportunities. The multiple use management policy does not require that all uses be allowed on every acre of forest land. It allows a mix of management emphases across the State Forest system.

Various individuals hold widely disparate opinions on whether and where motor vehicle use should be allowed on public forest lands and forest roads. Several comments focus on the differences between various classes of motor vehicles (ATV, OHM, ORV, HLV) and the differing regulations that apply to each type of vehicle. The vehicle classes are established in state statutes as are some of the regulations concerning use of motor vehicles on forest lands. The DNR must manage motor vehicle use on state forest lands within the framework provided by state laws. The DNR recognizes that differences exist between vehicle types and that vehicle characteristics affect the

suitability for various routes to sustain use by each type of vehicle. Safety concerns are one aspect in determining which vehicle types are allowed on various routes. DNR policy is that State Forest Roads are typically open to public use by all 4 types of motor vehicles unless there is a safety or resource related reason to restrict use by some types of vehicles. Designated motorized recreational trails on state forest lands have primary vehicle type(s) for which they are designed and maintained.

Trail Types and Management Techniques

Summary of Concerns

These comments describe the types of trails that the commenter prefers or suggest techniques for managing roads, trails, or other routes.

Comments on This Topic

01, 05, 07, 13, 15, 16, 20, 21, 27, 38, 40, 44, 46

Response to Concerns

About 2,500 of the 3,400 miles of routes in the planning area will be non-designated routes in *managed* forests. These routes will not be actively managed or mapped but will remain available for motor vehicle use in an as-is condition so long as such use does not result in rutting, erosion, or damage to trees. This will provide ample amounts of the non-destination type routes requested in comment #1. These non-designated routes will not be included on user maps of the forests so the increased use mentioned in comment #5 will not be generated by the fact that the route is on a map.

The desire for winter ATV riding opportunities (comments #1, 7, 15, 20) is noted. Forest roads and non-designated routes on *managed* forest lands are typically available for use in the winter. The issue of use of ATVs on snowmobile trails when the ground is frozen but there is inadequate snow to groom the trail for snowmobile use is beyond the scope of this project. However this issue is being discussed as ATVs increase in popularity and the period with deep snow decreases.

The mileage and location of routes in the forest is continually changing as timber is harvested, old routes revegetate, and beavers flood some routes (Comment #13). This will result in a shifting mosaic of routes available for motor vehicle use on forest lands classified as *managed*. On lands classified as *limited* there will need to be a decision if new routes will be managed as forest roads or trails open to motor vehicle use or if the route will remain non-designated and thus closed to motor vehicle use except as allowed under the hunting and trapping exception. New routes on forest lands classified as *closed* will not be available for motor vehicle use unless the route is added to the designated forest road system.

The concern about the color of ATV trail signs (Comment #16) has been passed onto DNR staff working on road and trail signing issues.

The DNR cannot close non-designated routes in *managed* or *limited* forests to all motor vehicle use as requested in comment #44. State laws and rules allow motor vehicle use on these routes in *managed* forests so long as such use does not result in rutting, erosion, or damage to trees. Certain hunting- and trapping-related motor vehicle uses are specifically allowed by statute in *managed* and *limited* forests. The DNR does not feel that existing patterns of motor vehicle use warrant classification of all lands as *limited* or *closed*.

Current vehicle classes (HLV, OHM, ORV, ATV class 1 and 2) are defined in state statutes. The DNR does not have the flexibility to designate or restrict routes for use by tracked ATVs only (comment #46). There may be situations where a tracked ATV would not cause rutting while a wheeled ATV would. It is up to the individual vehicle operator to ensure that their use of non-designated routes does not result in rutting.

Miscellaneous

Summary of Concerns

These comments express a concern or opinion that is not directly pertinent to the forest classification or road/trail designation decisions that are the subject of this planning effort.

Comments on This Topic

14, 17

Response to Concerns
Comments noted.