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Category: Off-Highway Vehicles

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Comment:

The following comments are derived from the information found in Appendix R of Volume 2 of the EIS. Appendix R provides a wealth of information that includes definitions, strategies and goals for OHV use I the plan area. If the management of OHV use in the plan area follows the guidelines outlined in Appendix R, we think that the development of quality OHV recreation is achievable throughout the plan area. Of course we'll have some specific questions regarding OHV use in the plan area and we will attempt to frame them in the context of the guidelines spelled out in Appendix R. We will try to sequence the questions in the order of the subtitles and we'll highlight those titles. Road and Vehicle Route Designation Process for Limited to Designated OHV Areas. It notes that certain objectives are to be completed within 5 years. Is this schedule limited to the planning and actions relevant to the development of that plan or does this require that a plan be developed, route inventory be completed, routes be identified and analyzed, signing and mapping concluded and routes officially designated while keeping the public involved throughout the process in that 5 year window? We think this is a substantial challenge and will require all available resources that are typically involved in travel management. Resources that might be better used coaxing recreational OHV users to ride where you want them to. This effort is only required in designated areas and the preferred alternative includes nearly 200,000 acres under that heading. Alternative D includes 66,000 acres under this strategy. We think it's possible to follow the guidelines in Appendix R and meet the 5 year objective under Alternative D. We doubt that it could be achieved under Alternative E without modifications. We applaud your decision continuing to allow travel on existing roads and trails until the designation process is complete. Under these guidelines can we expect that Poison Spider Park expansion; site identification for additional open riding areas, Bates Hole trail proposal, Muddy Mountain trail proposals and Upper Powder River areas will be front and center in the planning sequence. These geographic sub-areas have all been identified with management challenges from growing ATV use within the EIS and would warrant expedited management actions according to Appendix R.

A.OHV Designation Categories (p.R-6) Under the Limited category the phrase "allows for limited vehicle travel off existing roads and trails to accomplish necessary tasks and certain leisure-time activities; up to 300 feet... is spelled out. We think the plan should revise this description. We think that the 300 foot limit should only apply to roads, not trails. This accomplishes a number of goals within OHV management.

- a. Eliminates the liberal application of the 300 foot rule some users employ. (Especially those who find it hard to distinguish between 300 feet and 300 yards) We recommend that any departure from a trail be limited to a practical distance that doesn't obstruct other trail users.
- b. It places an emphasis on trail designation (trails being described as less than 48" in width).
- c. It encourages the conversion of roads to trails. Trails are easier to manage than roads. Trails have less physical impact on the resources.
- d. It allows hunters to use their ATV in a manner with which it was designed. It allows enforcement efforts to better

identify and prosecute off trail travel violations.

e. Trails are more likely to be supported by user groups for maintenance and monitoring.

I. Coordination with the State of Wyoming. This segment briefly explains the relationship between the BLM and Wyoming State Trails. As a member of the Wyoming State Trails Advisory Council we would like to add that multiple-use trail designations for ATV and motorcycle use is a high priority within the State Trails Program. Wyoming has an adequate amount of roads enrolled in the Trails Program throughout the state. These roads are of limited recreation value because they are subject to many of the regulations associated with on-highway travel. The requirement to be a licensed driver makes these routes an unappealing option for those who want to experience OHV recreation as a family. The lack of genuine trail opportunities for OHV recreation will have an effect on available funding for OHV recreation through State Trails. Projects that advance the goals for Wyoming State Trails found in the Wyoming State Trails Program: Vision 2010 publication will become priorities and roads enrolled in the ORRV program are not a substitute for trails and do not advance the goals established by State Trails.

L. Necessary Tasks. While we understand the need of specific operations occurring on public lands to operate OHVs in a manner contrary to specific OHV guidelines, we think that there use should closely resemble that allowed by the general public. Grazing operators should develop a travel plan for routine operations when operation occurs in an SMA. Recommend ROW operations use low impact off-highway vehicles when practical, instead of full size vehicles in SMA.

Thank you.