

# BLM Responses to Public Comments

## NON-GOVERNMENT ORGANIZATIONS

### Table of Contents

American Rock Art Research Association (ARARA).....	2
American Society for the Prevention of Cruelty to Animals (ASPCA) .....	3
American Wild Horse Preservation Campaign .....	5
Animal Welfare Institute .....	10
Bristlecone Alliance .....	14
California/Nevada Wilderness Committee.....	15
Capital Trail Vehicle Association (CTVA).....	17
Center for Biological Diversity .....	169
Coalition for Nevada's Wildlife (CNW).....	178
Desert Survivors .....	185
Friends of Nevada Wilderness.....	188
Humboldt River Ranch Association .....	192
Humboldt River Ranch Association Petition.....	202
Nevada Mining Association (NMA) .....	208
Northern Nevada Chapter Safari Club International.....	224
Ouachita ATV Adventure Club.....	232
Pershing County Natural Resource Advisory Committee (10/19/10) .....	234
Pershing County Natural Resource Advisory Committee (10/25/10) .....	236
Public Land Access Network - High Desert Coalition .....	239
Sagebrush Habitat Conservation Fund .....	246
Sierra Club.....	247
Take Action .....	251
TCSCWC - Toiyobe Chapter of Sierra Club Wilderness Committee .....	253
The Wilderness Society .....	254
Unknown Group .....	279
Western Watershed Project - Fite 9/24/10.....	281
Western Watershed Project - Fite 9/25/10.....	315
Western Watershed Project - Fite 10/19/10.....	322
Western Watershed Project - Fite 10/24/10 (w/ 4/12/05 attachment) .....	324
Western Watershed Project - Marvel 10/18/10 .....	376
Western Watershed Project - Marvel 10/25/10 .....	378
Western Watershed Project - list of attachments.....	379

NGO-ARARA

Comments

Responses

Linea Sundstrom <linea.sundstrom@gmail.com>

09/08/2010 02:42 PM

To: robert\_edwards@blm.gov  
cc:  
Subject: Winnemucca RMP

Dear Mr. Edwards,

I am writing on behalf of the Conservation Committee of the American Rock Art Research Association. My group supports Alternative C or D for the Winnemucca Resource Management Plan. In terms of rock art site protection, we feel that either of these options is preferred over the others proposed in the draft document.

Thank you. For more information about this group, please visit [www.arara.org](http://www.arara.org).

Linea Sundstrom, Chair  
Conservation Committee  
American Rock Art Research Association  
[linea.sundstrom@gmail.com](mailto:linea.sundstrom@gmail.com)

NGO-AARA-1:

Based on public comments, review with cooperating agencies, review of laws, policy, and guidance applicable to BLM, plus District Management and staff review the Geology sections has been revised in the Final RMP/FEIS.

NGO-  
AARA-1

NGO-ASPCA

Comments

Responses



**Rose Ann Sabaka**  
 <rose.ann.sabaka@ssa.gov>  
 Sent by: ASPCA  
 <website@aspc.org>

To wdrmp@blm.gov  
 cc  
 bcc  
 Subject Winnemucca District RMP

10/21/2010 03:38 PM  
 Please respond to  
 Rose Ann Sabaka  
 <rose.ann.sabaka@ssa.gov>

Oct 21, 2010

Bureau of Land Management Winnemucca District Office

Dear Office,

As a concerned citizen, I am writing to urge you to adopt a responsible Resource Management Plan that protects wild horse and burro populations in Nevada's Winnemucca District. Unfortunately, none of the alternatives described in the proposed Winnemucca RMP adequately protect and preserve wild horses and burros.

The policies presented in the proposed RMP do not change the BLM's reliance on mass wild horse roundups and removals to restrict wild horse populations and allow more federally subsidized cattle grazing on public lands. These fiscally irresponsible and inhumane policies have resulted in the stockpiling of approximately 40,000 wild horses in government holding facilities--more than are left free on the range.

A responsible policy must include:

- Eliminating livestock grazing within designated wild horse and burro areas;
  - Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity;
  - Fairly allocating forage and water resources for wild horses and burros within designated herd management areas;
  - Increasing appropriate management levels for wild horses and burros based on scientific data;
  - Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species;
  - Protecting predators in an effort to restore natural population control mechanisms;
  - Utilizing PZP fertility control, where necessary, to control wild horse reproduction; and
  - Supporting public/private partnerships for the creation of wild horse preserves to manage horses on the range without mass removals.
- Roundups of wild horses and burros should only be conducted in

The BLM received approximately 26,304 form letters listing comments identified in NGO-ASPCA. The BLM therefore considers the responses to this form letter as applicable to all form letters received listing the same comments. It should be noted the form generated by the ASPCA allowed submitters to add additional comments. Added comments on the form ranged from concern over the ranching/mining industry and development, concern over how horses are treated during gathering operations, the desire to protect horses and burros as part of our national treasure, to be kind to the wild horses, and to leave them alone. Many of the added comments were in disagreement with the BLM and its Wild Horse and Burro program and the use of tax dollars to gather the animals.

The BLM manages public lands for multiple uses, one of which is for wild horses and burros (WH&B). The appropriate management levels for WH&B were set in conjunction with the animal unit months (AUMs) for livestock grazing and wildlife. The appropriate management levels (AMLs) were set to achieve a thriving natural ecological balance on the public lands.

The BLM complies with the Wild Free-Roaming Horses and Burros Act of 1971 and uses the most humane tools during gathering; 43 CFR, Part 4740.1, states that "motor vehicles and aircraft may be used by the authorized officer in all phases of the administration of the Act, except that no motor vehicle or aircraft, other than helicopter, shall be used for the purpose of herding or chasing wild horses or burros for capture or destruction. All such use shall be conducted in a humane manner."

NGO-ASPCA-1: See above. BLM is mandated to manage WH&B in accordance with the Wild Free-Roaming Horses and Burros Act of 1971.

NGO-ASPCA-2: There are no designated wild horse and burros areas. HMAs are areas where burros and wild horses were found in 1971 that we manage for horses but not exclusively. Alternative C-LG 1—option 2 proposes elimination of livestock grazing throughout the WD.

NGO-ASPCA-3: The RMP analyzes minor adjustments to proposed levels of livestock grazing and a no livestock grazing option. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land.

- continued next page...

NGO-ASPCA-1

NGO-ASPCA-2

NGO-ASPCA-3

NGO-ASPCA-4

NGO-ASPCA-5

NGO-ASPCA-6

NGO-ASPCA-7

NGO-ASPCA-8

NGO-ASPCA-9

NGO-ASPCA

-10

NGO-ASPCA

## Comments

## Responses

NGO-ASPCA-10  
Cont-d

↑ verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds keeping family bands intact during relocation. The "zeroing out" of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited.

For all of the above stated reasons, I respectfully submit this comment and urge the BLM to adopt a responsible RMP for the Winnemucca District that protects and preserves America's wild horse and burro populations.

[Insert Comments Here]

Sincerely,

Mrs. Rose Ann Sabaka  
11421A Reisberg Ln  
Marriottsville, MD 21104-1201  
(410) 965-5571

NGO-ASPCA-3: Continued

The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing. The BLM has revisited the WH&B management actions and environmental analysis for the final RMP/FEIS.

NGO-ASPCA-4: The amount of forage available to allocate to WH&B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. Forage for WH&B (AUMs) is allocated based on the AML upper limit.

NGO-ASPCA-5: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

NGO-ASPCA-6: This is achieved by maintaining herds at AML and through properly managed livestock grazing.

NGO-ASPCA-7: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.

NGO-ASPCA-8: Alternatives A, B, and D allow use of birth control methods for WH&B, including PZP.

NGO-ASPCA-9: Comment noted.

NGO-ASPCA-10: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

NGO-AWHPC

Comments

Responses



"Suzanne Roy"  
 <arcy@wildhorsepreservation.org>  
 10/25/2010 10:30 PM

To <wdrmp@blm.gov>  
 cc "Deniz Bolbol" <deniz@wildhorsepreservation.org>  
 bcc  
 Subject Winnemucca RMP, Edwards

October 25, 2010

Bob Edwards  
 Winnemucca District Office  
 Bureau of Land Management  
 5100 East Winnemucca Blvd.  
 Winnemucca NV 89445-2921

Via e-mail: [wdrmp@blm.gov](mailto:wdrmp@blm.gov).

RE: "Winnemucca RMP, Edwards"

Dear Mr. Edwards:

These comments on the "Draft Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS) are submitted on behalf of the American Wild Horse Preservation Campaign (AWHPC).

AWHPC is dedicated to preserving the American wild horse in viable free-roaming herds for generations to come, as part of our national heritage. Our grassroots efforts are supported by a coalition of over forty historic preservation, conservation, horse advocacy and animal welfare organizations representing over 10 million people nationwide.

**Comments on the Draft RMP**

**WATER SOURCES (2-79):**

With the caveats below, AWHPC supports **Action D-FW 11.2**. "Fence spring sources and associated riparian-wetland areas being developed for livestock and wild horse and burro watering. Place watering facilities outside of the spring sources and associated riparian-wetland areas."

- Development of water sources must be minimal and using least intrusive technology possible.
- Development of water sources must be consistent with the carrying capacity of the land for wild horse and burro and wildlife populations.
- Development of water sources should preserve the natural flow of water from the spring head and protect the unique and naturally-occurring wetland habitat created as a result. It is possible to protect the spring head with fencing and

**NGO-AWHPC-1:**

When the BLM applies for water rights for WH&B, the NV State Engineer generally will not allow water for more horses than are described by AMLs.

The BLM does aim to preserve riparian areas, however development of springs and diversion of at least some water away from the riparian area for other uses must be an option in order to support multiple uses.

NGO-  
 AWHPC-1



NGO-AWHPC-1 Cont-d.	NGO-AWHPC	Comments	Responses
		preserve the natural flow of water from the spring.	
		<b>MANAGING HMA'S AND EXISTING HAS (p 2-90 to 2-92)</b>	
		AWHPC urges BLM to:	NGO-AWHPC-2:
		<ul style="list-style-type: none"> <li>● Continue to manage wild horse and burros (WHBs) and WHB habitat in 20 Herd Management Areas (HMAs).</li> <li>● Re-evaluate the 15 Herd Areas (HA's) for reinstatement as HMAs. Given the 20 million acres of WHB habitat that have been removed since 1971, BLM must look toward ways of restoring not reducing WHB habitat. Re-evaluating HA's for reinstatement as HMAs is included as a provision in the BLM's national draft strategy document. The RMP should reflect this national strategy, which responds to public demands for actions to increase and restore wild horse and burro habitat.</li> <li>● AWHPC supports creating more natural boundaries for HMAs to expand space for WHB and to accommodate more natural migratory and movement patterns. Expanding into HAs in order to increase space and useability of habitat within HMAs should be undertaken.</li> <li>● Boundaries should not be dictated by the presence of livestock allotment fencing, but rather natural barriers and natural movement patterns of WHB.</li> <li>● HMAs should be maintained separately. BLM lacks basic data on WHB behavior, ecology and population dynamics as well as individual herd data to determine whether consolidation of HMAs makes biological sense. If BLM were to attain such data, consolidation should only occur based on biological imperatives; administrative convenience is not sufficient reason to consolidate management of HMA's.</li> <li>● Fencing that impedes the natural movement of WH B should be modified or removed.</li> <li>● HMAs should be maintained in checkerboard areas. BLM must utilize its discretion with regard to renewal of permits for livestock AUMs as leverage to encourage private landowners to co-exist with WHB and share water and other resources.</li> <li>● HMAs should not be zeroed out. WHBs have already lost 20 million acres of habitat since 1971 when the Wild Free Roaming Horse and Burro Act was passed. HAs should be re-evaluated for reinstatement as HMAs.</li> <li>● Horses outside HMAs should not be permanently removed from the range. Rather they should be lured or relocated within HMAs, or be managed on-the-range utilizing strategies such as fertility control.</li> </ul>	<ul style="list-style-type: none"> <li>● Addressed by Alternative A WHB 1.</li> <li>● Habitat for WH&amp;B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&amp;B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. The areas that have not been designated as HMAs lack one of the 4 components, space, is comprised of checkerboard lands, of which BLM has no authority to manage WH&amp;B on private lands.</li> <li>● Addressed by WHB 1.3 and 2.1.</li> <li>● Comment noted.</li> <li>● A reasonable range of alternatives was analyzed, see WHB 1.2.</li> <li>● Fencing is addressed in WHB 2 et seq.</li> <li>● Checkerboard lands are those that those that have public land intermingled with private lands in a checkerboard pattern. The BLM has no authority to manage WH&amp;B on private lands and therefore the HAs within these areas will continue in this status.</li> <li>● See response to second bullet above.</li> <li>● Before issuing a decision to gather and remove animals, the authorized officer shall first determine whether excess WH&amp;B are present and require immediate removal. In making this determination, the authorized officer shall analyze grazing utilization and distribution, trend in range ecological condition, actual use, climate (weather) data, current population inventory, wild horses and burros located outside the HMA in areas not designated for their long-term maintenance and other factors such as the results of land health assessments which demonstrate removal is needed to restore or maintain the range in a TNEB.</li> </ul>
		<b>AML &amp; ROUNDUPS (p. 2-93 to 2-95)</b>	
NGO-AWHPC-3		The alternatives outlined fail to include on the range management strategies and continue the failed approach of frequent roundups, removals and stockpiling of wild horses in holding facilities.	NGO-AWHPC-3: Comment noted

	NGO-AWHPC	Comments	Responses
NGO-AWHPC-4		<p>This RMP must set a policy that breaks the unsustainable cycle of roundups and removals in favor of managing horses on the range in a humane and cost-effective manner. This policy must include:</p>	<p>NGO-AWHPC-4: A —C and E: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse &amp; Burro Act established HMAs and provided protection for WH&amp;B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&amp;B are both uses authorized to occur on BLM administered land.</p>
A.		<ul style="list-style-type: none"> <li>• Utilizing authority, pursuant to 43 C.F.R. 4710.5(a), to close livestock grazing on areas of public lands "if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury."</li> </ul>	
B.		<ul style="list-style-type: none"> <li>• Designating HMAs to be managed principally for wild horse herds under 43 C.F.R. 4710.3-2.</li> </ul>	
C.		<ul style="list-style-type: none"> <li>• Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity.</li> </ul>	
D.		<ul style="list-style-type: none"> <li>• Fairly allocating forage and water resources for wild horses and burros within designated herd management areas.</li> </ul>	<p>D and F: The amount of forage available to allocate to WH&amp;B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. For-</p>
E.		<ul style="list-style-type: none"> <li>• Giving priority to WHB over livestock and re-introduced or introduced big game species within designated HMAs.</li> </ul>	<p>age for WH&amp;B (AUMs) is allocated based on the AML upper limit.</p>
F.		<ul style="list-style-type: none"> <li>• Increasing Appropriate Management Levels for wild horses and burros.</li> </ul>	<p>G: This is achieved by maintaining herds at AML and through properly managed livestock grazing.</p>
G.		<ul style="list-style-type: none"> <li>• Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species.</li> </ul>	
H.		<ul style="list-style-type: none"> <li>• Protecting predators in an effort to restore natural population control mechanisms.</li> </ul>	
I.		<ul style="list-style-type: none"> <li>• Utilizing PZP fertility control, where necessary, to control wild horse reproduction.</li> </ul>	<p>H: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis . See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.</p>
J.		<ul style="list-style-type: none"> <li>• Supporting public/private partnerships for the creation of wild horse preserves and to implement alternative, in-the-wild management strategies.</li> </ul>	
K.		<ul style="list-style-type: none"> <li>• Accommodating horse population numbers over AML through conversion of livestock grazing AUMs to wild horses.</li> </ul>	<p>I: Alternatives A, B, and D allow use of birth control methods for WH&amp;B, including PZP.</p>
		<p>Roundups should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds; family bands should be relocated intact.</p>	<p>J and K: Comment noted.</p>
		<p>AWHPC supports PZP fertility control as long as administration follows established protocol guidelines that ensure proper use.</p>	
		<p>AWHPC opposes:</p> <ul style="list-style-type: none"> <li>• surgical and/or chemical sterilization of horses,</li> </ul>	
		<ul style="list-style-type: none"> <li>• use of unproven fertility control drugs</li> </ul>	
		<ul style="list-style-type: none"> <li>• skewing of sex ratios to favor males as a method for reducing reproduction due to harmful impacts on wild horse behavior.</li> </ul>	<p>NGO-AWHPC-5: See Action D-LG 1.3.1 and Action D-WHB 1.10. The Taylor Grazing Act authorized the use of rangelands to livestock grazing, the Wild Horse &amp; Burro Act established HMAs and provided protection for WH&amp;B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&amp;B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing.</p>
NGO-AWHPC-5		<ul style="list-style-type: none"> <li>• BLM must adjust WHB AML based on current, independently-verifiable monitoring data. Wild horses should be given preference over livestock grazing and reintroduced big game species in designated herd management areas. (Of 245 million acres of public land managed by the BLM, livestock grazing is allowed on 160 million acres, but wild horses and burros are restricted to 26 million acres.)</li> </ul>	

	NGO-AWHPC	Comments	Responses
NGO-AWHPC-5 Cont-d.		<ul style="list-style-type: none"> <li>Conversion of WH habitat to burro habitat and vice versa. HMAs should accommodate both species where possible, and adjustments made to livestock grazing in order to ensure that both species are accommodated.</li> </ul>	
		<p><b>MONITORING DATA (2-95):</b></p> <p>AWHPC supports Action C, which dictates that management actions be applied primarily to livestock if range monitoring data indicates adverse impacts on resources.</p> <p>Generally support <b>Action C-WHB 2.1</b>. "Maintain open unobstructed landscapes and the free-roaming nature of WHB by not allowing fence construction."</p>	Comments noted.
NGO-AWHPC-6		<p><b>WATER (2-96):</b></p> <p>AWHPC supports a combination of Alternatives C and D:</p> <ul style="list-style-type: none"> <li>Develop alternative waters when existing water sources that are used by WHB are fenced or otherwise encumbered.</li> <li>Acquire water rights for WHB</li> <li>Develop alternate waters, when water is the limiting habitat component and private water sources used by WHB are no longer available.</li> <li>Do not support removal of horses when private water sources become unavailable.</li> </ul>	NGO-AWHPC-6: Comments noted.
		<p><b>HARMFUL USES (2-97):</b></p> <p>Support Alternative C WHB 4.1</p>	
NGO-AWHPC-7		<p><b>Action C-WHB 4.1.</b> Proposed activities (e.g., motor vehicle racing, outfitter, or guides), which could result in adverse impacts on the health and welfare of WHB would not be permitted in HMAs unless impacts are determined to be minimal.</p>	NGO-AWHPC-7: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis would be conducted.
NGO-AWHPC-8		<p><b>ENVIRONMENTAL IMPACTS</b></p> <p><i>Effects Common to All Alternatives (P 4-82)</i></p> <p>This analysis overstates the impacts of WHB on riparian areas and underestimates the damaging impacts of livestock. With regard to impacts on riparian areas, the analysis omits entirely the fact that horses tend to use the environment, including stream riparian areas, very differently from cattle. Cattle loaf in streams, and trample and devour vegetation all along any accessible reaches. This promotes desertification processes, and amplifies adverse effects of climate change.</p>	NGO-AWHPC-8: BLM has revisited management actions and environmental analysis applicable to WH&B management in the FEIS/RMP.

	NGO-AWHPC	Comments	Responses
NGO-AWHPC-8		<p>Wild horses on the other hand typically come to water sources to drink and then disperse, having less impact on the entire riparian zone area than cattle.</p> <p>This should be corrected in the final RMP.</p> <p><i>Effects Common to All Alternatives ( 4-152, 4-202)</i></p>	<p>NGO-AWHPC-8: Comment noted.</p>
NGO-AWHPC-9		<p>The Environmental Analysis mis-states the impact of wild horses on the land. The analysis should incorporate the attached study which documents impacts of horses limited to trailing and benefits of horses for native plant populations.</p> <p><b>APPENDIX K: WILD HORSE STANDARDS AND GUIDELINES</b></p> <p>Standards 5,6,7</p>	<p>NGO-AWHPC-9: Data related to impacts of WH&amp;B vs. cattle can be interpreted to show greater impacts from either animal. The BLM relies on current science as well as professional experience to help determine management options. This section will be re-visited in the FEIS/RMP. BLM reviewed and considered the attached literature; however, it is not included in this appendix. To view these documents contact the Winnemucca District Office at 775-623-1500, or via e-mail at wfoweb@blm.gov.</p>
NGO-AWHPC-10		<p>Detail many scenarios for wild horse removals, but ignores BLM's discretion, pursuant to 43 C.F.R. 4710.5(a), to close livestock grazing on areas of public lands "if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury."</p> <p>Removal of WHB should be considered only as a last resort and only after livestock is removed in order to achieve range management standards.</p> <p>Standards 10-11 AWHPC opposes the use of skewed sex ratios to reduce wild horse reproduction.</p> <p>Standard 14 AWHPC opposes removals of WHB outside of HMAs. BLM should use on the range management tools and relocation with HMAs options to deal with such situations.</p> <p>Thank you for your consideration of these comments.</p> <p>Sincerely,</p> <p>Suzanne Roy Campaign Director American Wild Horse Preservation Campaign 919-697-9389 <a href="mailto:sroy@wildhorsepreservation.org">sroy@wildhorsepreservation.org</a> <a href="http://www.wildhorsepreservation.org">www.wildhorsepreservation.org</a></p>	<p>NGO-AWHPC-10: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse &amp; Burro Act established HMAs and provided protection for WH&amp;B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&amp;B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing</p>

NGO-AWI

Comments

Responses



## Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003 • [www.awionline.org](http://www.awionline.org)  
telephone: (202) 337-2332 • facsimile: (202) 446-2131

October 25, 2010

### **BY ELECTRONIC AND REGULAR MAIL**

Mr. Bob Edwards  
Bureau of Land Management  
Winnemucca District Office  
5100 East Winnemucca Blvd.  
Winnemucca, NV 89445-2921

Dear Mr. Edwards:

On behalf of the Animal Welfare Institute (AWI), I submit the following comments on the Winnemucca District Office Draft Resource Management Plan and Environmental Impact Statement (DES 10-21).

These comments are largely focused on wild horse and burro management as addressed in the Draft RMP. For the benefit of wild horses and burros and to maximize the management of these iconic animals on the range, AWI encourages the BLM to select a final alternative that combines elements of the alternatives evaluated in the Draft RMP. Specifically, AWI supports a prohibition on all livestock grazing within the project area (see Alternative C, Option 2), no net loss in the amount of land (acres) available for wild horses in Herd Management Areas (HMAs), ensuring the existing waters are available to wild horses by removing fences or other obstacles preventing access, and maximizing the protection of wild horses and burros on the range. AWI also supports the use of immunocontraceptive vaccines to assist in regulating the growth of wild horse and burro population if there is a legitimate need to control population growth, the vaccine is safe and efficacious, the wild horse and/or burro population is managed at a number that will protect the population's short and long-term genetic health and viability, that appropriate monitoring is done to assess any impacts of vaccine use on wild horse behavior or herd social dynamics, and that said vaccine use is subject to appropriate and required environmental compliance.

In regard to all of the other issues and the four alternatives discussed in the RMP, the mere fact that AWI is not providing comment on each issue or alternatives should not be interpreted as either support for or opposition to those issues or the components of the alternatives that don't pertain to wild horse and burro management.

## NGO-AWI

## Comments

## Responses

AWI Comments on Winnemucca Draft RMP  
October 25, 2010  
Page 2

NGO-AWI-1	<p>Though AWI had hoped that the Draft RMP would have provided an opportunity to review and comment on Appropriate Management Levels (AML) for wild horses in each of the Herd Management Areas under the jurisdiction of the Winnemucca District Office, the BLM specified in the Draft RMP that said AMLs are established through multiple use decisions or MUDs. Draft RMP at 3-62. Though many BLM offices set wild horse and burro AML in RMPs, the BLM in Nevada appears to set its AMLs in MUDs. It is unclear if this is a requirement and/or a result of some past court order or if this is simply the traditional mechanism used by the BLM in Nevada to establish AML. If that is the case, this tradition should be amended so that the BLM in Nevada operates in a manner consistent with BLM offices in other states by establishing and reevaluating AML in the context of an RMP. At a minimum, the BLM must explain why MUDs are used to establish wild horse and burro AMLs in Nevada and provide a compelling and rational reason why it should not or does not want to transition to establishing AML in the context of an RMP.</p>	<p>NGO-AWI-1: MUDs are multiple use decisions, they look at all the users of the vegetation: wildlife, wild horses, burros, and livestock. In accordance with H-4700-1, "An interdisciplinary and site-specific environmental analysis and decision process (NEPA) with public involvement is required to establish or adjust AML.</p>
NGO-AWI-2	<p>In addition, the BLM should disclosed in the Final RMP information about the future schedule for reevaluating all of the MUDs within the project area including providing approximate dates when those MUDs will be subject to reevaluation. For AWI and the other wild horse advocacy organizations and individuals concerns about wild horse management, as well as for other interest groups, having such information would be valuable for planning purposes. Considering that MUDs are used in Nevada to determine wild horse and burro AML, it is imperative that all relevant MUDs be subject to reevaluation in the near future so that the data relevant to establishing AML can be disclosed, discussed, and analyzed. Depending on the data, including forage production data, AWI strongly supports the increase in wild horse and burro AML within the HMAs under the jurisdiction of the Winnemucca District Office.</p>	<p>NGO-AWI-2: Outside the scope of this RMP. Providing schedules for multiple use decisions are outside the scope of the RMP analysis. They are completed on a case-by-case basis with opportunity for public involvement along with separate NEPA analysis.</p>
NGO-AWI-3	<p>Despite the failure of the BLM to disclose and specific data relevant to wild horse and burro management, livestock management, or wildlife management (i.e., alleged impacts to rangeland vegetation, riparian areas, water quality), the BLM is attempting to use the Draft RMP to zero out wild horses from select HMAs and to eliminate those HMAs entirely. This is impermissible as it is entirely inconsistent with federal law and BLM policies which require that such decisions be based on the analysis of relevant data demonstrating, for example, that wild horses or burros can't be sustained within HMAs due to a lack of cover, space, food, water, or other important and critical resources. This is not to suggest that the BLM can't make decisions to permanently remove wild horses and to close down or eliminate HMAs, but it can't do so through this Draft RMP given the lack of disclosure of evidence/data to substantiate this need and the lack of any analysis of that evidence.</p>	<p>NGO-AWI-3: Action WHB 1.8.1 allows for conversion of HMAs back to HAs in accordance with the Wild Horse &amp; Burro Act where it has been determined that these areas do not provide adequate habitat to support healthy populations of wild horses or burros. Horse gathers are implementation decisions based on monitoring and population counts and would require separate public involvement and NEPA analysis.</p>
NGO-AWI-4	<p>As an initial matter, the BLM should provide a more detailed explanation as to its use of the designations of Herd Areas and HMAs to manage wild horses and burros. Based on a review of Figure 2-12 in the Draft RMP, it is clear that the acreage contained in Herd Areas within the project area is far greater than the acreage in HMAs. The BLM must explain why this is the case and, more specifically, include detailed information as to why certain Herd Areas were</p>	<p>NGO-AWI-4: Refer to Action D-WHB 1.1.</p>

NGO-AWI

**Comments**

AWI Comments on Winnemucca Draft RMP  
October 25, 2010  
Page 3

**Responses**NGO-AWI-4  
Cont-d

previously eliminated from within the project area (i.e., compare Figure 2-12 with Figure 2-11 in the Draft RMP). It would appear, based on Figures 2-12 and 2-11 that the following Herd Areas are not represented in the existing HMAs within the project area: Truckee Range, Trinity Range, Antelope Range, Eugene Mountains, Humboldts, East Range, Selenite Range, Sonoma Range, Krum Hills, Bloody Runs, Slumbering Hills North, Slumbering Hills South, Lower Paradise Valley, Hot Springs Mountains, and Osgood Mountains. Why are wild horses and/or burros not managed within these Herd Areas? When were these Herd Areas eliminated? What was the justification for eliminating each Herd Area?

NGO-AWI-5:

Refer to Chapter 4, Wild Horses and Burros.

Action WHB 1.2 allows for adjusting HMA boundaries to existing fences or topological barriers. This helps facilitate management of WH&Bs within these areas.

NGO-AWI-5

In the description of each alternative evaluated in the Draft RMP, the BLM fails to disclose that any of the alternatives involve the proposed permanent removal of wild horses and the elimination of additional Herd Areas/HMAs in part or whole. See Draft RMP 2-8 to 2-10. This possibility is identified for Alternative B and D in Table 2-3 (Draft RMP at 2-93). This possibility is also reflected in Figure 2-15 for Alternative B (elimination of Nightingale Mountains, Shawave Mountains HMAs, modification of Seven Troughs Range HMA) and in Figure 2-17 for Alternative D (modification of Nightingale Mountains, Shawave Mountains, Seven Troughs Range, Jackson Mountains, and McGee Mountain HMAs). In addition, though not disclosed in the text of the Draft RMP, even Figure 2-13 for Alternative C (Options 1 and 2) includes modifications to HMA boundaries (Nightingale Mountains, Shawave Mountains, McGee Mountain HMAs).

NGO-AWI-6:

Refer to Chapter 4, Wild Horses and Burros.

H-4700-1, Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

NGO-AWI-6

If the BLM wants to eliminate or modify the boundaries of HMAs, it must provide evidence to substantiate this need. This evidence must include, at a minimum, data demonstrating that there's a lack of water, food, cover, or space to sustain a wild horse or burro population. Both the National Environmental Policy Act and BLM's own wild horse and burro management policies (Wild Horses and Burros Management Handbook; H-4700-1). Without such data and its analysis – both of which are lacking from the Draft RMP – the BLM cannot make a decision to permanently remove wild horses or burros from said areas, eliminate the HMAs, and/or modify the HMA boundaries through this RMP process. Nor can the BLM use the Draft RMP process to determine that it will take these action pending site specific environmental review since, by deciding through the RMP process to close or modify these HMAs, it would render meaningless any subsequently environmental impact analysis. Therefore, the BLM must not make a determination as to the potential closure of, or modification to the boundaries of, any HMA through this RMP process unless it discloses far more information about the alleged need for said closures and subject any new analysis to public review and comment.

A recurring pattern of WH&B movement out of the HMA to access forage, water, or thermal or hiding cover is an indication that year-long WH&B use cannot be sustained. If one or more of the key habitat components is missing, the HMA should be considered as unsuitable for year-long use. In these situations, the authorized officer should consider removing the area's designation as an HMA through LUP. An exception would be two or more HMAs which adjoin and are managed as a complex of HMAs, or HMAs which adjoin USFS WHTs that can be managed as a complex.

NGO-AWI-7

Finally, AWI would note that in regard to the analysis of environmental consequences of the impacts of the proposed action and other alternatives on rangeland vegetation and vegetation in riparian habitat and wetlands, the BLM concedes that its analysis is "qualitative" because "specific impacts of resource activities on vegetation cannot be quantified." (Draft 4-168; 4-193). It is astounding that the BLM has not bothered to conduct the necessary rangeland monitoring and/or to gather vegetation data (production, abundance, composition, distribution,

Action WHB 1.2 allows for adjusting HMA boundaries to existing fences or topological barriers. This helps facilitate management of WH&Bs within these areas.

NGO-AWI-7: FLPMA Sec. 202(c) (4) gives BLM the discretion to rely to the extent it is available, on inventory of the public lands, their resources and other values. Alternatives were developed using existing available data.

NGO-AWI

**Comments**

**Responses**

AWI Comments on Winnemucca Draft RMP  
October 25, 2010  
Page 4

NGO-AWI-7  
Cont-d



health, vigor and trends in such over time) in order to provide a quantifiable analysis of vegetation conditions within the project area; to assess how livestock, wildlife, and wild horses use and/or impact such vegetation; and to compare vegetation data to other measures (i.e., precipitation, ambient temperatures) to understand the ecology of the ecosystem in order to better predict the impacts of its proposed management actions. The BLM must provide a better explanation than it has (i.e., the analysis is qualitative because specific impacts cannot be quantified) as to why it apparently has no quantifiable data to use in its analyses.

Thank you for the opportunity to provide these comments on the Draft RMP. Any future correspondence on this matter should be sent to D.J. Schubert, Animal Welfare Institute, 3121-D Fire Road, PMB#327, Egg Harbor Township, NJ 08234 or delivered via e-mail to [dj@awionline.org](mailto:dj@awionline.org).

Sincerely,

D.J. Schubert  
Wildlife Biologist

NGO-Bristlecone Alliance

**Comments**

**Responses**

**Bristlecone Alliance**

P O Box 1055  
 McGill NV 89318  
 775-235-7557  
[mssquaw@hotmail.com](mailto:mssquaw@hotmail.com)

RECEIVED BLM  
 WINNEMUCCA NV  
 2010 SEP 20 PM 2:41

Sept. 17,2010

REF: Winnemucca RMP, Edwards

**Wilderness Characteristics Areas**

- **We support the RMP's identification of the following areas as having wilderness characteristics:** Fencemaker, North Sahwawe Mountains, Tobin Range and the two units in the Granite Range (Buckhorn Peak and Granite Peak).
- In addition, we request that you add these areas to the list of Wilderness Characteristics Areas:
  - the area directly south of the Blue Lakes WSA to the Sage Hen drainage, and
  - the highly-scenic core ridge of the Lava Beds including its western flank.

NGO-Bristlecone Alliance - 1

**Management of Wilderness Characteristics Areas**

We would ask that you more clearly define the management actions for protecting the Wilderness Characteristics Areas as follows. These areas should be:

- designated as "limited to designated routes,"
- classified as a Class I for Visual Resource Management,
- closed to mineral material disposal, mineral leasing and mineral entry,
- included in rights-of-way exclusion areas, and
- retained in public ownership.

NGO-Bristlecone Alliance - 2

**Wilderness Study Areas**

- We support designating all WSAs as "limited to designated routes" and we stress that a high priority should be given to identifying these routes with signs and on maps;
- high priority also should be given to promptly restoring wilderness character from damage created by vehicle incursions within the WSAs, and
- we support the acquisition of private inholdings in WSAs, Wilderness and in Wilderness Characteristics Areas to enhance wild character.

NGO-Bristlecone Alliance - 3

Delaine Spilsbury, Director



NGO-Bristlecone Alliance - 1:

The Citizens Proposal put forward by the Pershing County Checkerboard Lands Committee for Wilderness Characteristics Inventory has been adopted by this RMP. This Citizens Group and the BLM determined that the Lava Beds did not meet the criteria for Wilderness Characteristics.

NGO-Bristlecone Alliance - 2:

The BLM has developed a range of alternatives for managing areas with wilderness characteristics. Please see Action C-WSA 2.1 and Maps showing VRM and disposal/retention for all alternatives.

NGO-Bristlecone Alliance -3:

All WSAs in the District are managed under H-8550-1 Interim Management Policy for Lands Under Wilderness Review (IMP). The IMP limits mechanized travel, with certain exceptions, to designated routes. Changes to existing signage and maps will be addressed through the subsequent Transportation & Travel Management Planning process.

## NGO-CNWC

## Comments

## Responses



Vicky Hoover  
 <Vicky.Hoover@alerraclub.org>  
 >

10/25/2010 04:42 PM

To: wdrrmp@blm.gov

cc:

bcc:

Subject: Comment on Winnemucca DRMP

Dear Mr. Edwards:

Thanks to the BLM for preparing a revision for the Winnemucca Resource Management Plan and for providing an opportunity to the public to comment. BLM lands in Nevada are especially important, as Nevada has a larger percentage of its area in the public domain than any other state (in the Lower 48.) These lands are a vital public wildlands resource.

Although I live in California, I have visited many areas in the Winnemucca District since I began visiting Nevada's wild places around the mid-1980s. I have led outings to some areas in the Winnemucca District, to help get Californians acquainted with the wild values of these lands. The Fox Range and the Selenite Range, Poodle Mountain WSA, and the Calico Mts are all places to which I have taken groups – often more than once. I have also visited High Rock Canyon and Little High Rock Canyon and climbed Pahute Peak. For Californians part of the attraction of these areas is their relative accessibility from the San Francisco Bay Area – and their grandiose contrast with the more crowded, developed lands in California. Nowhere better than in these Winnemucca District public lands can one recapture a sense of austere power of the lonely wild places that early settlers must have encountered long ago.

The best way to assure preservation in an undeveloped state of roadless public lands is to eventually have them designated as wilderness. Not all lands are eligible for this high level of protection, but I believe BLM is indicating a new and laudable level of appreciation of the irreplaceable wild values of some of its lands – values that, once irrevocably diminished through road construction or other developments, can never be gotten back. Continued protection of official Wilderness Study Areas (WSAs) helps keep these wild values in place; and the identification of additional lands (beyond existing WSAs) with wilderness characteristics is an important indication of new BLM appreciation for wildness – as a public resource. In the early 1980s when the initial inventory of roadless lands was done, the agency was then new at the game of evaluating wild places and did not yet have the experience of caring for such lands that an additional quarter century or so – and the new experience of managing wilderness -- has brought it.

In BLM's draft RMP for the Winnemucca District, I favor Alternative C, Option 1, as the best way to retain the wild values of Winnemucca's roadless lands. I especially support the identification of wilderness characteristics for the following areas: Fencemaker, North Sahwave Mountains, Tobin Range, and the Buckhorn Peak and Granite Peak. I have long considered the Granite Range, prominently visible above the Black Rock desert, as a key candidate for wilderness protection but understood that it could not be a WSA because of too many private inholdings -- which BLM has since commendably acquired. These acquisitions make this wild and dramatic range, with abundant wildlife, a potential wilderness area.

NGO-  
CNWC-1

I ask BLM, in the final RMP, also to identify the Lava Beds, especially the scenic core ridge, as an area of wilderness characteristics.

Regarding WSAs, I was pleased to learn that the county commission of Humboldt County now supports wilderness in the Pine Forest Range; thus I am hopeful that the Blue Lake's WSA may relatively soon become wilderness.

NGO-CNWC-1: The Citizens Proposal put forward by the Pershing County Checkerboard Lands Committee for Wilderness Characteristics Inventory has been adopted by this RMP. This Citizens Group and the BLM determined that the Lava Beds did not meet the criteria for Wilderness Characteristics.

	NGO-CNWC	Comments	Responses
NGO-CNWC-2	<p>While I commend BLM for identifying lands with wilderness characteristics, such identification, on its own, does not offer ongoing protection of those characteristics. It is important that the revised RMP include clear and specific management direction to assure the identified wilderness characteristics will remain. Some minimum management prescriptions that the plan should formalize include:</p>		NGO-CNWC-2: Lands with Wilderness Characteristics are identified and addressed at D-WSA 2 and D-WSA 2.1.
NGO-CNWC-3	<p>First, and perhaps most obviously – these lands must be retained in the public ownership. Second, areas with wilderness characteristics should be classified as Class 1 for Visual Resource Management. Third, they should have vehicular travel limited to designated routes only. Fourth, these lands should be withdrawn from mineral leasing and mineral entry Fifth, these areas should be included in rights-of-way exclusion areas</p>		NGO-CNWC-3: Lands proposed suitable for retention are identified in Figure 2-66. OHV Travel designations are provided in Figures 2-53. Rights of way exclusion areas are located in Figure 2-62.
NGO-CNWC-4	<p>Current WSAs should also "limited to designated routes" for vehicle use. These designated routes should be identified with signs and on maps. I urge BLM to give a high priority to restoring any damage caused by vehicle incursions in WSAs. I also favor BLM acquisition of private inholdings within WSA's, Wilderness, and Wilderness Characteristics Areas – whenever possible, subject to willing sellers and availability of funding. At times, it might be possible to arrange a land exchange rather than an outright acquisition.</p>		NGO-CNWC-4: Designation of routes and signage will be further addressed and brought forward in the subsequent Transportation and Travel Management Planning process. See D-R-10.2. Acquiring inholdings are addressed in LR 4.1.2 (4).
NGO-CNWC-5	<p>Climate change, a new and sometimes overwhelming concern related to our public lands, should be considered in new planning. While effects of a changing climate cannot well be known, and the future of course is uncertain, our land agencies still have the responsibility of considering it, and retaining management options for evaluating changed conditions. The Secretary of Interior's Secretarial Order # 3289, from Secretary Ken Salazar, regarding climate change, places mandates on the managing agencies, because: "The realities of climate change require us to change how we manage the land, water, fish and wildlife, and cultural heritage and tribal lands and resources we oversee." The Secretary's memo states that "Shifting wildlife and habitat populations may require investments in new wildlife corridors". Thus, the RMP should address the need to identify where corridors may be needed and establish a process to identify, design and designate them.</p>		NGO-CNWC-5: The BLM has conducted additional analysis for climate change in the FEIS. See Chapter 3 Air Quality. This analysis includes greenhouse gases, major economic sectors contributing to emissions that are subject to BLM land use management practices, global mean temperature changes and future trends. Wildlife priority habitat areas, management of priority watersheds, lands and realty exclusion and avoidance areas all contain use restrictions which would protect wildlife habitat and populations. See figures 2-5, 2-1, 2-62, 2-60.
NGO-CNWC-6	<p>The RMP should also include a focus on visitor education with an emphasis on the positive values of roadless wild lands. That is – for areas without roads there should be no apology for a more restricted access or other perceived problem; instead the focus should be on the good it does – wildlife are freer and unhampered, people can savor the quiet, can find solace –even if only temporarily -- in the freedom from mechanical and motorized civilized appurtenances that most of us live with daily.</p>		NGO-CNWC-6: Refer to objective B, C and D-R 1.
NGO-CNWC-7	<p>Signs for roadless lands – wilderness and WSAs, should also emphasize the positive. Yes, signs must legally state what is prohibited – NO motorized vehicles allowed – but they should start with the positive: "hikers and horse riders welcome" – then go on to what can't be done. (I have found this to be a concern on various BLM wilderness boundary signs for example, they start out: Wilderness behind this sign: CLOSED to....." That's not a very positive message about wild places to give to people! I think BLM can do better. Signs can be re-written to state the rules with a more positive emphasis.)</p>		NGO-CNWC-7: This will be further addressed and brought forward in the subsequent Transportation and Travel Management Planning process. See D-R-10.2
	<p>I support protection of all river segments which Alternative C found eligible for Wild and Scenic River status in the BLM report of 2006.</p>		
	<p>Thank you for considering my comments. I would like to receive a copy of the final RMP.</p>		
	<p>Vicky Hoover Chair, California/Nevada Wilderness Committee 85 Second St., 2nd floor San Francisco, CA 94105-3459 (415)977-5527 fax:(415)977-5799 vicky.hoover@sierraclub.org</p>		

NGO-CTVA

Comments

Responses

**CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)**

**P.O. Box 5295  
Helena, MT 59604-5295**

September 15, 2010

Bob Edwards  
Winnemucca District Office  
5100 E Winnemucca Blvd.  
Winnemucca NV 89445-2921  
[wfoweb@nv.blm.gov](mailto:wfoweb@nv.blm.gov)

Re: Comments for the draft Winnemucca RMP and EIS

Dear Mr. Edwards,

We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the draft Winnemucca RMP and EIS. We enjoy riding our OHVs on primitive trails and roads in Nevada. All multiple-use land managed by the Bureau of Land Management provides a significant source of these OHV recreational opportunities. We feel strongly about OHV recreation for the following reasons:

**Enjoyment and Rewards of OHV Recreation**

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in a healthy and enjoyable sport.
- Opportunity to experience a variety of opportunities and challenges.
- Camaraderie and exchange of experiences.
- For the adventure of it.

**Acknowledged Responsibilities of Motorized Visitors**

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

We feel that we are representative of the needs of the majority of visitors who recreate on public lands but are not organized with a collective voice to comment on their needs during the public

*We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.*

*Page 1 of 152*

## NGO-CTVA

## Comments

## Responses

input process. These independent multiple-use recreationists include visitors who use motorized routes for weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation.

NGO-CTVA-1

Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100, <http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=>). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision.

NGO-CTVA-1: BLM is required under FLPMA to manage the public lands for multiple uses. BLM has developed a range of alternatives applicable to OHV use. Refer to recreation alternatives starting on page 185 of the Draft RMP/EIS. Alternatives were developed using existing available data. Although alternatives were developed in collaboration with the RAC subgroup, public outreach has been extensive and contributed to the development of the planning issues and RMP Alternatives.

Many federal actions have led to the continual closure of motorized recreational opportunities and access and at the same time the number of OHV recreationists has grown to 50 million. Multiple uses of the forest are marginalized every time a forest plan or travel management plan comes up for action. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the draft Winnemucca RMP and EIS. We would ask that this project address the attached checklist of issues and address the goals and needs identified. Using this checklist will help identify and address concerns and, hopefully, the needs of the public will be adequately met by implementing a more reasonable multiple-use alternative.

NGO-CTVA-2

NGO-CTVA-2: BLM has developed a range of alternatives with respect to OHV use designations as open, limited or closed (see Action R 10.1 and Figures 2-50 through 2-53). Specific designations for OHV use, and alternatives thereof, will be addressed during the Travel and Transportation Management Plan process.

The project area with its current level of motorized access and recreation is where hundreds of thousands of residents from Nevada and the surrounding go to enjoy motorized recreation. The project area is where we go and what we do to create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails.

NGO-CTVA-3

With respect to cumulative effects, the BLM has complied with requirements of NEPA by analyzing direct, indirect, and cumulative impacts for a full range of management alternatives, including opportunities for motorized recreation (refer to section 4.1.3). BLM considered past, present and reasonably foreseeable future actions in the analysis. Refer to Table 2-3 Proposed Goals, Objectives and Actions per Alternative [Sustainable Development] and 4.1.1 Analytical Assumptions, p 4-1 of the Draft. The FEIS/RMP will reflect additional analysis in the cumulative impacts section.

NGO-CTVA-4

The starting alternative proposes to close nearly 100% of the existing motorcycle routes. Our comments document that the current management trend towards massive motorized closures such as this is not responsible to the public's needs for motorized access and recreation and is contrary to

NGO-CTVA-3: See response to NGO-CTVA-1

NGO-CTVA-4: Not applicable to the Winnemucca District RMP.

## NGO-CTVA

## Comments

## Responses

the multiple-use management directives specified by congress. The agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors and at the same time other outdoor activities have declined 18 to 25% (Journal of Environmental Management 80 (2006) 387-393, <http://www.redrockinstitute.org/uploads/PNAS.pdf> and <http://www.msnbc.msn.com/id/22998037/>). The agency can no longer ignore the needs of motorized recreationists and act irresponsibly by continuing to close a large percentage of existing motorized access and recreation opportunities. The agency can no longer ignore the need for new motorized recreational opportunities. The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists. We cannot tell you how many times we have met motorized recreationists and they have asked us "What is going on?" This question will be even more prevalent if the travel plan is pushed by the public in a short time frame. In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.

There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing needs of motorized recreationists. These are the supreme issues that this action must address. The evaluation and proposal must adequately address these three issues and the predisposition to motorized closures must be avoided. The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals.

Motorized recreationists have become the new conservationists<sup>1</sup>. We are ready and committed to working with the Winnemucca District Office to preserve and enhance motorized trails for all recreationists through responsible environmental protection. We respectfully ask that the selected action for the draft Winnemucca RMP and EIS be structured to produce this end result by addressing and implementing the comments provided.

We request that the BLM provide an adequate and fair evaluation of:

1. The needs of motorized recreationists and the cumulative impacts of motorized closures,
2. All existing routes including those meeting National OHV Rule guidelines and currently closed routes,
3. The current imbalance of non-motorized to motorized trails, and
4. At least one pro-recreation alternative in the analysis.
5. Under the existing condition, too much of the Winnemucca District Office area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964 (<http://www.ourdocuments.gov/doc.php?flash=true&doc=97&page=transcript>). In order to

<sup>1</sup> Rothman, Hal, New West Front Page, January 15, 2006. <http://www.newwest.net/index.php/main/article/5318/>

NGO-CTVA-5

NGO-CTVA-5: See response to NGO-CTVA-1.

NGO-CTVA-6

NGO-CTVA-6: Baseline data will be evaluated and addressed during the subsequent Transportation & Travel Management Planning processes.

NGO-CTVA-7

NGO-CTVA-7: The Travel and Transportation Management Plan will include its own NEPA process and public involvement. Issues, such as the needs of motorized recreationists, can be addressed at this time. Regarding recreational opportunities, BLM has developed a range of alternatives. Refer to recreation alternatives starting on page 185 of the Draft RMP/EIS. Alternatives were developed using existing available data. Although alternatives were developed in collaboration with the RAC subgroup, public outreach has been extensive and contributed to the development of the planning issues and RMP Alternatives.

NGO-CTVA-8

NGO-CTVA-8:

- 1) The needs of motorized recreationist & the cumulative effects of road closures are the types of issues addresses in a Travel and Transportation Management Plan.
- 2) The concern addressed within this comment ("An adequate and fair evaluation of . . . all existing routes including those meeting National OHV Rule guidelines and currently closed routes") are the type of issues that are addresses in a Travel and Transportation Management Plan.
- 3) The concern addressed within this comment ("The current imbalance of non-motorized to motorized trail") is the type of issue that is addresses in a Travel and Transportation Management Plan.

These levels of activity planning (1-3) will be taking place after the Resource Management Plan is in place, and it is conducted in a manner consistent with the NEPA Environmental Assessment processes.

- 4) Recreation is promoted to varying extents in each of the Alternatives of the proposed RMP.
- 5) Comment noted.

## NGO-CTVA

## Comments

## Responses

reasonably meet the requirements of integration a reasonable management goal for 99% of the forest would be for shared multiple-use that would produce a forest-wide 50/50 sharing and equal opportunity of non-motorized/motorized trail opportunities.

The draft Winnemucca RMP and EIS must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.

The draft Winnemucca RMP and EIS must include the evaluation of a pro-recreation alternative so that motorized recreationists do not end up losing before the process begins. A true pro-recreation alternative should be based on the actual usage of the area which is 99% motorized multiple-use in the case of the draft Winnemucca RMP and EIS.

A reasonable alternative should include:

- a. Sharing non-motorized trails with mountain bikes and motorcycles,
- b. Creating new mountain bike and motorcycle trails,
- c. Creating ATV trails from roadbeds that both currently open and closed,
- d. Creating new ATV trails
- e. Creating new ATV trails that connect with converted roadbeds to create loops, and,
- f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes.

We would respectfully request that these points and others in the following comments be adequately addressed so that a reasonable pro-recreation alternative can be implemented. We appreciate your consideration of our comments.

Sincerely,

/s/ Action Committee on behalf of our members  
Capital Trail Vehicle Association (CTVA)<sup>2</sup>  
P.O. Box 5295  
Helena, MT 59604-5295  
[CTVA\\_Action@q.com](mailto:CTVA_Action@q.com)

<sup>2</sup> CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com) and Blue Ribbon Coalition (sharetrails.org). Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org)

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*Page 4 of 152*

NGO-CTVA  
-9

NGO-CTVA—9:  
Impacts of OHV designations are addressed in Chapter 4 and will be further addressed & brought forward in the subsequent Transportation & Travel Management Planning processes.

NGO-CTVA-10:  
Creation of OHV trails, routes and loops will be further addressed & brought forward in the subsequent Transportation & Travel Management Planning processes.

NGO-CTVA-  
10

NGO-CTVA

Comments

Responses

Contacts:

Doug Abelin at (406) 461-4818 [dabelin@bresnan.net](mailto:dabelin@bresnan.net)  
Don Gordon at (406) 458-9577 [DGordon315@aol.com](mailto:DGordon315@aol.com)  
Ken Salo at (406) 443-5559 [ksalo245@msn.com](mailto:ksalo245@msn.com)  
George Wirt at (406) 443-7923 [gwirt@bresnan.net](mailto:gwirt@bresnan.net)

CC: Dave Koch, President CTVA  
Brian Hawthorne, BRC  
Craig Osterman, Treasure State Alliance  
Ed Melcher, FFOR  
Fred Hodgeboom, MMU  
Kerry White, CBU  
Janine Stewart, SAWS  
Mona Ehnes, Sec/Treasurer MTVRA  
Rick Deniger, President MTVRA  
Russ Ehnes, President GFTBRA  
Tim Ravndahl, Western Tradition Partnership  
Tom Mander, Montana 4x4

NGO-CTVA

Comments

Responses

## Information and Issues That Affect Motorized Recreation

September 15, 2010

### INTRODUCTION

NEPA and CEQ guidance require that the proposed action be issue-driven. Additionally, many past actions have enacted wholesale motorized closures. The cumulative effect has become significant and this trend is no longer acceptable. (FSH 1909.15, Chapter 10, Section 15.1 - Cumulative Effects for the definition of "cumulative effects" and other terms, see section 05. Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions, when added together, may have collective or cumulative impacts which are significant. Cumulative effects which occur must be considered and analyzed without regard to land ownership boundaries. Consideration must be given to the incremental effects of past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals.)

Therefore, meeting the unanswered needs and frustrations of over 50 million motorized recreationists is the most significant issue at hand for this proposed action. FSH 1909.15 Chapter 10, Section 12.32 - Identify Significant Issues *Recommend to the responsible official the significant issues to be addressed, taking interested and affected agency, organization, and public comments into account. The responsible official, not the ID team or the analyst(s), approves the list of significant issues used to develop alternatives and may adjust and refine the issues as new insights and information emerge during analysis.*

This action and others to follow should address the issues and needs of the public by:

- (1) Preserving all reasonable existing motorized recreational opportunities,
- (2) Enhancing existing and developing new motorized opportunities to address the growing needs of the public for motorized recreational opportunities, and
- (3) Implementing mitigation plans to compensate for excessive amount of past motorized closures.

The logic used by the agency does not always have a rational connection with the issues and facts as they pertain to maintaining and developing motorized recreational resources. To assist your understanding of the issues and information that affect us we are providing the following collection of rational reasons to perpetuate existing and develop new motorized recreational opportunities. This information is provided with the request that it be adequately used to develop, select, and defend a reasonable multiple-use alternative. For every issue presented, there is a positive action that could be taken that would address the issue. Many solutions are obvious. For those problems that have less obvious solutions, motorized recreationists would work collaboratively with the agency to develop innovative solutions. We are committed to working towards that end and provide this information and list of issues in the spirit of cooperation.

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*Page 6 of 152*

NGO-CTVA-11:

These issues will be addressed & brought forward in the subsequent Transportation & Travel Management Planning processes.

NGO-CTVA  
-11

NGO-CTVA

## Comments

## Responses

**Information and Issues:**NGO-CTVA  
- 12

**Note that a number of references are to Forest Service reports and data. We suggest that this data be used in two ways: (1) the data and trends is also indicative of public land use on BLM lands, and (2) similar data is not available for the project area and needs to be developed by the BLM. This information will support additional OHV opportunities.**

In order to address our concerns the project must adequately address all of the following issues:

1. There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. We request that this important need be adequately addressed in the preferred alternative.
2. The current emphasis on climate change is being given far too much weight. This focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time. There are many in the scientific community that support this position (<http://www.sepp.org/Archive/NewSEPP/LtrtoPaulMartin.html>, [http://sciencepolicy.colorado.edu/admin/publication\\_files/resource-2803-2010.06.pdf](http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf), <http://www.climatewatch.org>, <http://epw.senate.gov/speechitem.cfm?party=rep&id=263759> ). The climate has always been changing. Twelve thousand years ago North American was covered by ice. Before that dinosaurs roamed the area in a humid climate. The planning rule should not create impacts on the human environment because it “presumes” that the climate is changing any more or less than it always has. The planning rule must be based on extensive long-term credible scientific study. The quality of people’s lives cannot be compromised by a ghost issue without adequate basis. We only get one shot at this life and we want to experience the positive benefits of OHV recreation. Extensive long-term credible scientific conclusions on climate change do not exist at this time and, therefore, it would be unreasonable to make any assumptions about climate change and use those assumptions to impose any impacts on the human environment including motorized recreation in this action.

Additionally,

- Global temperatures are not warming. Since 1998, global temperatures have decreased almost half a degree C.
- The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.
- Manmade CO2 concentrations in the atmosphere are about 19 PPM (5% of 387 PPM overall CO2) which is 1 part in 51,680 total parts – in no way significant. (Hydrogen cyanide gas is one of the most poisonous gases known to man and allowable working conditions for this gas in most of the US are 20 ppm. Carbon dioxide is harmless and actually helpful to plant life and total concentrations of it in the atmosphere by manmade

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*Page 7 of 152*

NGO-CTVA  
-13

NGO-CTVA-12:

The Winnemucca District is currently in the process of collecting data to be used for the Transportation and Travel Management Plan process.

NGO-CTVA-13: The BLM has conducted additional analysis for climate change in the FEIS. See Chapter 3 – Air Quality. This analysis includes greenhouse gases, major economic sectors contributing to emissions that are subject to BLM land use management practices, global mean temperature changes and future trends.

NGO-CTVA

Comments

Responses

causes are only 19 ppm. Carbon dioxide concentrations at present are near the LOWEST in geologic history. (<http://co2now.org/>)

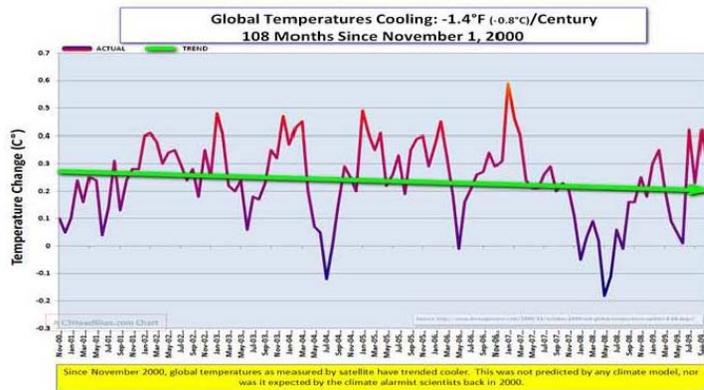
- There is no statistical correlation between CO2 concentrations in the atmosphere and global temperatures. (Source: <http://www.droyspencer.com/2010/01/december-2009-uah-global-temperature-update-0-28-degree-c/> )
- Global sea ice has increased by 200,000 square kilometers since 1980. (Arctic Sea Ice – down 900,000 Sq Km, Antarctica Sea Ice – up 1.1 Million Sq Km).

Global Sea Ice:		1980	2009
Southern Hemisphere	Antarctic	4.7	5.8
Northern Hemisphere	Arctic	15	14.1
Total		19.7	19.9

- Polar bear populations are much higher today than they were 30 years ago. (<http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polar-bear-expert-barred-by-global-warmists.html> )
- Over 95 % of the so-called “greenhouse effect” is caused by water vapor (evaporation of the oceans).
- There is no evidence that would purport that motorized recreation has a significant impact on the climate or climate change.

NGO-CTVA  
– 14

NGO-CTVA-14: Impacts of OHV use on air quality addressed in section 4.2.1 *Effects from Recreation, Visitor Outreach, and Services Management.*

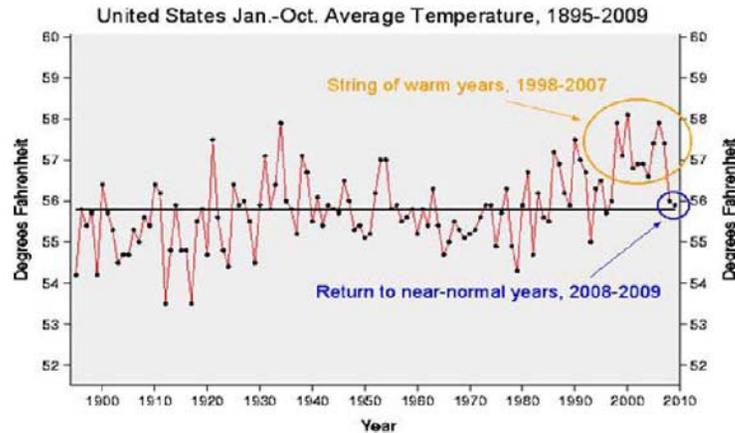


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NGO-CTVA

Comments

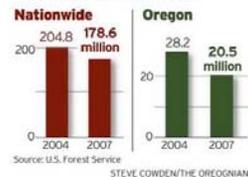
Responses



The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.

3. The current trend of excessive motorized access and motorized recreational closures is having a significant impact on the number of visitors to the forest as shown in the recently released NVUM report ([http://www.fs.fed.us/recreation/programs/nvum/nvum\\_national\\_summary\\_fy2007.pdf](http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf), <http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt>) and the following graphic based on that data. This trend has created significant issues in regards to adequate public access and adequate motorized recreation which much be analyzed adequately during the process.

Visits to national forests have fallen off nationwide and sharply in Oregon.



Forest Service Region	National Forest Visits 2004 (000s)	National Forest Visits 2007 (000s)	Change in Visitation (000s)	% Change
01 Montana, Northern Idaho, Northeast Washington, North Dakota	13,200	11,265	-1,935	-15%
02 Colorado, Kansas, Nebraska, South Dakota, Wyoming	32,500	31,025	-1,475	-5%
03 Arizona, New Mexico	20,500	20,502	2	0%
04 Nevada, Utah, Southern Idaho	23,300	21,315	-1,985	-9%
05 California	30,700	28,702	-1,998	-7%
06 Oregon, Washington	28,200	20,495	-7,705	-27%
08 Southeastern US, Puerto Rico	31,000	25,867	-5,133	-17%
09 Northeastern US	22,500	17,033	-5,467	-24%
10 Alaska	2,900	2,421	-479	-17%
TOTAL	204,800	178,625	-26,175	-13%

4. Many comments by motorized recreationists are being dismissed by the agency as not being substantive comments because they did not show up on a list of significant issues developed by the agency. The injustice is that the agency is not identifying and addressing issues that are significant to motorized recreationists including importance of each existing route, cumulative effects of all motorized closures, and need for more not less motorized recreational opportunities, and others discussed in the following comments. The NEPA process should have

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Page 9 of 152

NGO-CTVA-15: Impact of OHV use designations addressed in Chapter 4. Public access issues will be addressed through the Transportation and Management Plan process.

NGO-CTVA-16: These issues will be addressed & brought forward in the subsequent Transportation & Travel Management Planning processes that will be analyzed under NEPA regulations which includes public involvement.

NGO-CTVA-15

NGO-CTVA-16

## NGO-CTVA

## Comments

## Responses

been an issues driven process and the significant issues for a travel plan should be those that have the greatest impact on motorized recreationists. The agency is avoiding and selecting issues that circumvent the requirement to address significant issues that affect motorized recreationists. We request that this evaluation address all of the significant issues that affect motorized recreationists.

NGO-CTVA-17 5. A resource management plan should be about identifying and meeting the needs of the public for use of and access to their land. Less than 1% of the visitors to the forest are involved and comment during the plan process. In order to assure a fair and unbiased process it is necessary to separate the true issues and needs of the public from the influence of well-funded special interest groups with a limited-use agenda. We request that the BLM develop and implement screening procedures to identify influence groups with annual budgets greater than \$100,000. These procedures should also identify all of the different influence mechanisms in use by groups meeting these criteria. We also request that the BLM develop procedures that equalize the influence received from groups with annual budgets greater than \$100,000 so that this influence does not obscure the needs and benefits of 99% of the public that are less-organized, less-funded, and have a wide diversity of multiple-use interests. The forest plan must reflect the benefits and needs of the public in a fair and even-handed way. The goal of this program would be to assure that the decision produces a wide sharing of resources and life's amenities. These additions to the planning process are needed to restore the basis of public benefit and need to the process and to remove the political influence that has obscured public benefit and needs from the current process.

6. Sadly, one indicator of the condition of the human environment in Montana is the suicide rate. Montana ranks number 2 in the nation (<http://www.suicide.org/suicide-statistics.html>). This significant problem has been specifically identified as requiring special attention by the Department of Health and Human Services <http://www.dphhs.mt.gov/amdd/statesuicideplan.pdf>. Motorized recreation is popular and it is a very healthy and positive human activity that can help address this significant human issue. The BLM can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.

NGO-CTVA-18

7. A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized use, designates which vehicles will be allowed on which routes and if seasonal restrictions apply. A comprehensive trail designation plans does the same thing except it includes all trail uses, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a "comprehensive" travel plan by using only the existing inventory of motorized routes. They do this by identifying existing motorized trails that are good for mountain bikes, equestrians and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn't mean the agency can't take into consideration the effect each alternative will have on non-motorized visitors. It can - and it should be part of the NEPA analysis. But that is totally different from specifically providing a non-motorized trail system via the existing inventory of motorized routes. We support the creation, designation and management of non-motorized trails, but not at the expense of motorized visitors. We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-

NGO-CTVA-19

NGO-CTVA-17:

The BLM, WD affords opportunity for the public to review and comment on environmental documents. Documents are available through the District's NEPA web page at: [http://www.blm.gov/nv/st/en/fo/wfo/blm\\_information/nepa0.html](http://www.blm.gov/nv/st/en/fo/wfo/blm_information/nepa0.html). WD has recently made documents available through the national NEPA register as well: [https://www.blm.gov/epl-front-office/eplanning/nepa/nepa\\_register.do](https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do)

NGO-CTVA-18: Recreation is addressed in the Recreation, Visitor Outreach and Service Section Table 2-1.

NGO-CTVA-19:

The Travel and Transportation Management Plan will present various alternatives and will undergo a separate analysis under NEPA. The sufficiency of route inventory data will be addressed at that time. See D-R-10.2

	NGO-CTVA	Comments	Responses
NGO-CTVA-20		<p>motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.</p> <p>8. An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, and four-wheel drive vehicles. Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick that the team should measure travel plan alternatives by.</p>	<p>NGO-CTVA-20: This will be addressed &amp; brought forward in the subsequent Transportation &amp; Travel Management Planning processes, discussed in management action R 10.x. See D-R-10.2.</p>
NGO-CTVA-21		<p>9. NEPA, CEQ, BLM and Forest Service Handbook (FSH) require consideration of all reasonable alternatives (FSH 1909.15, Chapter 10, Section 12.33 - <i>Explore Possible Alternatives Consider a full range of reasonable alternatives to the proposed action that address the significant issues and meet the purpose and need for the proposed action.</i>) The project has a critical flaw which is the lack of a true "pro-recreation" alternative that adequately addresses motorized recreation. All of the alternatives developed for consideration represent a significant reduction in routes available for motorized use. Not one Alternative even sustains the current opportunity. Conversely, virtually every project has developed a "preservation" alternative, where a maximum amount of closures are considered. The increasing demand for OHV recreation opportunities on public lands is extensively documented. Therefore, it is incumbent upon the project team to formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area. Therefore, we request that the project team formulate a wide range of alternatives including at least one Alternative that maximizes motorized recreational opportunities in the project area and addresses the following:</p>	<p>NGO-CTVA-21: See alternative D-R 10.1, 10.2 and 10.3. Alternative A addresses current management. Alternative B proposes the most acres open to OHV use (1,460,200 acres).</p>
NGO-CTVA-22		<ul style="list-style-type: none"> <li>• The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation.</li> <li>• The pro-recreation alternative should strive to provide for the current and future demand for OHV recreational routes.</li> <li>• Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.</li> <li>• Where appropriate, the agency should use this process to analyze the impacts of any future route construction and include those in the decision.</li> <li>• Direction for the required process to construct new routes should be incorporated into each alternative.</li> <li>• At least one alternative should maximize the ability to construct new sustainable trails to meet the current and future need.</li> <li>• The project team should develop management alternatives that allow for proactive OHV management.</li> <li>• All alternatives should include specific provisions to mark, map and maintain designated roads, trails and areas in cooperation with OHV users.</li> <li>• All alternatives should include direction to engage in cooperative management with OHV groups and individuals.</li> </ul> <p>10. One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where "several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS." <i>Neighbors of Cuddy Mountain v. U.S. Forest Serv.</i>, 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting <i>City of Tenakee Springs v. Clough</i>, 915 F.2d 1308, 1312 (9th Cir. 1990)). A</p>	<p>NGO-CTVA-22: See alternative D-R 8.1.2. The Winnemucca SRMA includes Water Canyon, Bloody Shins and Sand Dunes, all of which provide OHV opportunities. Future need of recreational opportunities has been considered. Refer to Methods and Assumptions for section 4.3.3 (Impacts to Recreation and Facilities). The Transportation and Travel Management will address many of these issues. Through that process, BLM will explore opportunities for cooperative agreements. See D-R-10.2.</p> <p>Route signage, mapping, maintenance, cooperative agreements and funding will be addressed in the Travel and Transportation Management Plan</p>

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NGO-CTVA

**Comments**

**Responses**

cumulative effect is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”18 40 C.F.R. § 1508.7. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.

. A starting list of actions that should be included in a cumulative effect analysis include:

NGO-CTVA-23:

Effects of OHV designation on recreation are addressed in Section 4.3.3 and will be further addressed & brought forward in the subsequent Transportation & Travel Management Planning processes. This will also address the impacts of lost opportunities for the motorized recreationists.

NGO-CTVA  
-23

NGO-CTVA

Comments

Responses

Table of Cumulative Effects on Motorized Recreationists								
Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000					No	FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails**		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000					No	FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000					No	FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700					No	FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Bute RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009
Helena area	52.2	9.8		42.5	81.42%	No		
Blackfoot TP	376,000	**				No	FS	Ongoing
Divide TP	155,000	**				No	FS	Ongoing
Custer NF Beartooth TP	580,000					No	FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP	437,000	**				No	FS	Ongoing
Custer NF Sioux TP	436,000	**				No	FS	Ongoing
Bitterroot NF TP	1,589,000	**				No	FS	Ongoing
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000					No	FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000					No	FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000					No	FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**				No	FS	Ongoing
Lolo Forest Plan	2,083,000	**				No	FS	Ongoing
WMPZ Forest Plan	6,043,000	**				No	FS	Ongoing
<b>Subtotal</b>	<b>50,494,925</b>	<b>39,413.3</b>	<b>28,343.3</b>	<b>11,068.7</b>	<b>28.08%</b>	<b>No</b>		
<b>Other Significant Measures of Closed Motorized Opportunities</b>								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
<b>Notes:</b>								
* estimated impact								
** underway with expected significant impact								
*** additional impact associated with significant loss of quality trails and substitution with roads								
**** number of snow machines								
***** All motorized trails closed								
Source: CTVA, P.O. Box 5295, Helena, MT 59604-5295, ctva_action@q.com								

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## NGO-CTVA

## Comments

## Responses

NGO-CTVA  
-24

12. Recently, Joseph Carbone, a NEPA specialist for the Forest Service, testified that the agency completed a broad review of the retardant's potential ecological impact, but it didn't consider the cumulative impact of retardant drops and ground-based firefighting ([http://www.helenair.com/articles/2008/02/28/top/60st\\_080228\\_rev.prt](http://www.helenair.com/articles/2008/02/28/top/60st_080228_rev.prt)). In order to avoid the same situation here the evaluation must include a meaningful evaluation of the cumulative effects of all current and reasonably foreseeable motorized closures on motorized recreationists including decisions and proposals in all surrounding areas and reasonably foreseeable actions as listed in the National OHV Policy.
13. Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities with this action. This can be accomplished by implementing a route designation for all existing routes.
14. The route designation process was supposed to inventory all existing motorized routes and designate them for motorized use. Instead it is being used to produce wholesale motorized closures contrary to the understanding with motorized recreationists. The process needs to be re-directed back onto the right path.
15. Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important.
16. All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.
17. The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use.
18. Single-track challenge trails are needed for expert riders and trials type motorcycles.
19. The needs of the public for motorized recreational opportunities include a variety of trails for different skill levels. Also, routes with minimal traffic are needed as practice routes for beginning riders.
20. National Forests in Idaho have a long and successful history of sharing single-track trails with motorcycles and we request that this strategy be used in the project area.
21. Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.
22. The majority of visitors to the project area are associated with multiple-use opportunities including motorized access and motorized recreation opportunities.
23. These are multiple-use lands as designated by congress and must be managed as such. Recreation is a stated purpose for multiple-use lands.
24. Wilderness is closed to motorized vehicles and equipment. Therefore, multiple-use lands should be open to motorized vehicles and equipment. Wilderness criteria and standards should not be applied to multiple-use lands.
25. Any measurable impact from OHV use is automatically and incorrectly judged to be significant. OHV impacts are a small fraction of natural actions. Nature should be used as the standard for comparison of OHV impacts.
26. Why are motorized recreationists the only ones to lose in an action that is supposed to address the needs of the public for motorized access and motorized recreational opportunities? In other

NGO-CTVA-24: See response to NGO-CTVA-25.

NGO-CTVA  
-25

NGO-CTVA-25: The Transportation and Travel Management Plan will provide a range of alternatives of route designations, analyze the impacts of those alternatives, and identify mitigation.

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*Page 14 of 152*

## NGO-CTVA

## Comments

## Responses

NGO-CTVA  
-26

words, the travel planning process should work to justify existing motorized recreational opportunities and create new ones. Instead it is being used as a massive motorized closure process.

27. The public that enjoys motorized access and recreation is not going to participate in a process where they lose every time.
28. Why are the needs of so many motorized recreationists being largely ignored?
29. In too many cases a couple of non-motorized users have been able to displace hundreds of motorized users. It is not reasonable or fair to allow a few non-motorized recreationists to convert a motorized trail used by hundreds of motorized recreationists for their exclusive use.
30. Motorized recreationists have been losing ground starting with the wilderness designations in the 1960's and continuing on with the roadless rule, forest plans, resource management plans and travel plans. Please explain why the needs of non-motorized recreationists are provided for at a much higher level (quality and quantity) than motorized recreationists?
31. Why are motorized recreationists put on the defensive in this action and virtually every other BLM and Forest Service action? In other words, why must motorized recreationists always start with a proposal for radically less motorized access and recreational opportunities and then battle the process just to get a lot less than status quo every time? Why do non-motorized recreationists gain in every action and why do motorized recreationists lose in every action? It appears to us that cumulative effects on motorized recreationists are being ignored because it would expose this built-in defect in the process.

NGO-CTVA-26: See response NGO-CTVA-25.

NGO-CTVA  
-27

32. Why are the BLM and Forest Service trying to eliminate all meaningful motorized access and OHV recreation?
33. When the agency is considering closing a route, please also think of how you would respond to somebody who asks "We have been going there or camping there for years and what has been hurt? Why do we have to give it up now? Where do we go?"

NGO-CTVA-27: FLPMA mandates that the BLM administered land be managed for multiple uses.

NGO-CTVA  
-28

34. The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.

NGO-CTVA-28: BLM has complied with CEQ direction to encourage and facilitate public involvement. (40 CFR 1500.2(d) and 40 CFR 1506.6). Public outreach has been extensive. The Notice of Intent and Notice of Availability were published in the Federal Register on March 25, 2005 and June 25, 2010, respectively. Over 1600 individuals and organizations were sent RMP newsletters. Newspaper advertisements and news releases were published in local newspapers. In addition four public open houses were held during the scoping process and for the comment period of the draft RMP/EIS. The subsequent Transportation and Travel Management Plan will also be subject to CEQ directions for public involvement.

NGO-CTVA  
-29

35. Site specific monitoring of motorized versus non-motorized use must be provided for each route.
36. Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.

NGO-CTVA  
-30

37. Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles.
38. The quality of our experience has been reduced in other ways. For example, every time we ride on a road or trail we wonder or talk about whether this will be the last time and what sort of fight it will take to keep it open. This dark cloud ruins the recreation experience that is so badly needed.
39. What is the cumulative effect on the public of this motorized access and motorized recreational closure combined with all other motorized access and motorized recreation closures in the state?

NGO-CTVA-29: Monitoring will be further addressed in the Transportation and Travel Management Plan.

NGO-CTVA-30: Impacts of OHV designations on socio-economic values has been addressed in section 4.5.3 and will be further analyzed in the Transportation and Travel Management Plan.

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*Page 15 of 152*

NGO-CTVA	Comments	Responses
NGO-CTVA -31	<p>40. The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.</p> <p>41. There are no compelling reasons to close as many motorized access and motorized recreational opportunities as has been proposed by the BLM. It is simply contrary to the public need and the way that the public has historically used all multiple-use areas in the Winnemucca Resource Management Plan project area.</p> <p>42. Trail closures in semi-primitive motorized areas represent a significant amount of the total available both forest-wide and area-wide. These are the highest value routes to motorized recreationists and the impact would be significant. This impact is unacceptable unless these routes are mitigated with new routes of equal value.</p>	NGO-CTVA-31: See response to NGO-CTVA-25.
NGO-CTVA -32	<p>43. There are compelling reasons to maintain and enhance the existing level of motorized access and motorized recreation in the project area. Please find reasons why and reasonable recommendations attached to this letter for existing and enhanced opportunities.</p> <p>44. Note that some new construction may be required to accomplish a reasonable system of loops. Therefore, new construction must be included in the scope of the project.</p> <p>45. The existing level of motorized access and recreation must not be dismissed without adequate consideration because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.</p> <p>46. The preferred alternative must provide for an adequate number of routes as required to provide access to the many historic mines and cabins and an adequate number of dispersed campsites and trailheads.</p> <p>47. We have been keeping observations of the types of visitors in multiple-use areas including the since 1999 and have found that 97% of the visitors are motorized recreationists (see attached pages). The public votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit.</p> <p>48. The travel management plan for the area must reflect that use and the needs of the public for motorized recreational opportunities in the area. Again, these are multiple-use lands and we ask that they remain viable multiple-use lands by not closing existing motorized routes.</p> <p>49. A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes fires. Recent fires in the project area discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years.</p> <p>50. Confirmation of the significant magnitude of the impacts of fire versus the relatively minor impacts of recreation are further substantiated by the following article from the Helena IR: <i>The popular Meriwether picnic area, located along the Missouri River in the Gates of the Mountains corridor, also will be closed until the area is deemed safe for public use. Following the 2007 Meriwether Fire, debris and numerous floods continue to flow through the picnic site, creating a serious safety hazard. The public docks will not be installed this year; instead, people should use Coulter campground. The Meriwether Picnic Area closure could remain in effect for several years, until hydrologic conditions improve in Meriwether Canyon. "Flash floods, as those</i></p>	NGO-CTVA-32: Existing management was analyzed under Alternative A. The referenced attached letter/pages (comments #43 and 47) were not attached.

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NGO-CTVA	Comments	Responses
	<p><i>happening at this site, occur when the ground becomes saturated with water that cannot be absorbed quickly enough," said Mike Cole, acting Helena District ranger. "Without live vegetation to absorb the precipitation up on the mountain, the water runs off and floods the picnic area." <a href="http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1">http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1</a></i></p>	
NGO-CTVA -33	<p>51. With respect to the comment that there is not enough money to mitigate problems, we can work with the Bureau of Land Management as partners in many different grant applications. Also see our comment in the attachment in regards to the significant levels of funding that are generated by motorized recreationists and would be available if the agency would pursue them and the system was working to distribute them equitably. Basically OHV recreationists generate a significant amount OHV gas tax. These monies should be used to maintain, develop, and mitigate issues but, unfortunately, it is being diverted elsewhere. This significant issue must be addressed.</p> <p>52. The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. OHV trail maintenance and gas tax monies are available to fund this maintenance. Each region could set up a program similar to the Trails Unlimited program (<a href="http://www.fs.fed.us/trailsunlimited/">http://www.fs.fed.us/trailsunlimited/</a>). AmeriCorps type labor could also be used. The SWECO could not be used on motorcycle single-track trails but they typically require less maintenance and water bars/dips/mounds can usually be constructed on these trails by hand work.</p> <p>53. The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from trails and roads (July 2007 Stream Notes at <a href="http://www.stream.fs.fed.us">http://www.stream.fs.fed.us</a>). Many other best management practices are available to control sediment production at demonstrated by the bibliography at <a href="http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf">http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf</a>.</p> <p>54. The draft Winnemucca RMP and EIS project area has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to "explore" closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience.</p>	NGO-CTVA-33: Route signage, mapping, maintenance, cooperative agreements and funding will be addressed in the Travel and Transportation Management Plan
NGO-CTVA -34	<p>55. The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement. Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists. We are concerned that the process will not provide motorized recreationists with an equal opportunity in the outcome and we are only destined to lose. We would appreciate an independent evaluation of this situation as soon as possible so that the proper scoping direction can be corrected early in the process.</p>	NGO-CTVA-34: The Transportation and Travel Management Plan will address existing routes.
NGO-CTVA -35	<p>56. The mitigation bank debt for motorized route closures should include all of past and reasonably foreseeable closures in the draft Winnemucca RMP and EIS project area. There could have been a reasonable OHV route system in the area and using appropriate seasonal closures, it would not have produced significant impacts on the wildlife management. So far it has been impossible to</p>	NGO-CTVA-35: See response to NGO-CTVA-28.

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	NGO-CTVA	Comments	Responses
NGO-CTVA -36		<p>get consideration of re-opening of closed routes or any new routes to re-establish a reasonable OHV system in that area.</p> <p>57. Every action starts and ends with a proposal to close motorized opportunities (Gallatin, Clancy-Unionville, North Belts, South Belts, Little Belts, Rocky Mountain District, Custer, Beaverhead-Deerlodge, Dillon RMP, Butte RMP, etc.) and provide considerably less motorized access and recreation. There has not been one action that included an alternative to perpetuate existing motorized opportunities, mitigate for cumulative effects and create motorized recreational opportunities to address the growing needs of the public. Motorized recreationists are put at an immediate disadvantage in every process and that disadvantage is carried through to the end.</p> <p>58. Note that non-motorized recreationists can use routes that are both open and closed to motorized recreationists including roads and the evaluation of the opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can use an infinite amount of cross-country opportunity and motorized recreationists can not. A reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources.</p>	NGO-CTVA-36: See response to NGO-CTVA-25.
NGO-CTVA -37		<p>59. <b>NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.</b> Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the Mt Hood National Forest. Therefore, every mile of existing road and motorized trail is very, very important. The evaluation must adequately consider and address the fact that motorized access to the Mt Hood National Forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles of motorized trails are exceptionally inadequate for the thousands of OHV recreationists looking for those opportunities. Additionally, the miles of motorized trails and especially single-track is way out of balance with the needs of thousands of motorized recreationists in the region surrounding the Mt Hood National Forest. At the same time, the miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available. The total route opportunity available to non-motorized recreationists is 3,004 miles and the total miles of exclusive non-motorized trails are 990 (95.19% of all existing) and the cross-country miles are infinite. The total miles of roads open to motorized recreationists are 1,635 and the total miles of trails open to motorized recreationists is 50 (4.81% of existing) and the miles of cross-country opportunity is zero.</p> <p>Given the number of motorized recreationists and the miles of routes available, it should be very obvious that motorized recreationists are already squeezed into an inadequate system of routes.</p> <p>Under the existing condition, 34.68% of the Mt Hood National Forest is set-aside for segregated exclusive non-motorized use for 2.30% of the visitors to the forest. The remaining 97.70% of the visits are associated with multiple-use. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. In order to reasonably meet the requirements of integration a reasonable management goal for the 65.32% of the forest which is designated by congress as multiple-use would be for shared multiple-use.</p>	NGO-CTVA-37: The Analysis of Management Situation (2005) prepared for the RMP provided baseline data for recreation visitation, trends in visitation, etc. OHV use and forecasted use was also addressed. OHV use is also addressed in Section 3.3.3 of the RMP. Data is continuously being collected that will serve to meet the needs of the forthcoming Transportation and Travel Management Plan.

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NGO-CTVA

Comments

Responses

NGO-CTVA-38

The overall allocation of **existing** non-motorized versus motorized access and trail riding opportunities in the Mt Hood National Forest is a **reasonable starting point** given the needs of the public for motorized access and the recreational needs of motorized recreationists. We request that this data be used to guide the decision-making to a preferred alternative that adequately meets the needs of the public by **increasing motorized recreational opportunities** in the project area.

NGO-CTVA-38: Outside scope of this RMP .

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
	6 MtHood	All	1,068,859	Open	9/9/2006	1,964	1,635	1,040	50	43	752,524
<b>Totals</b>						1,964	<b>1,635</b>	1,040	50	43	752,524
Miles of Open Road per Square Mile =						0.83					
Total Roads and Trails Open to Non-Motorized Use, Miles =						3,004					
Non-Motorized Trails, Miles =						990					
Non-Motorized Trails, % =						95.19%					
Motorized Trails, miles =						50					
Motorized Trails, % =						4.81%					
Trails Open to Motorcycles %						4.13%					
<a href="http://www.fs.fed.us/recreation/programs/ohv/">http://www.fs.fed.us/recreation/programs/ohv/</a> <a href="http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf">http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf</a>											

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

NGO-CTVA-39

60. **NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** In order to bring equality to the allocation of non-motorized to motorized trails in the Mt Hood National Forest must either convert 470 miles ((990 – 50)/2) of non-motorized trails to motorized trails or 940 miles (990-50) of new motorized trail must be constructed. The current allocation of trail resources is unbalanced and any reduction of motorized trail opportunities would be a step in the wrong direction and would create an even greater imbalance.
61. While we do not support segregation, if segregation is to be implemented on multiple-use lands (which must be considered public places), then a corresponding goal would be to demonstrate an absolutely perfect 50/50 sharing of non-motorized and motorized trails as part of that segregation. Therefore, if the proposed plan further promotes segregation on multiple-use lands, then it must include a corresponding 50/50 sharing and it must not tip the balance further in favor of non-motorized trails and at the expense of motorized routes.
62. Because of the gross imbalance of trail opportunities demonstrated in the table above (currently it is heavily in favor of non-motorized), routes constructed or maintained in the past using motorized funds, including agency, gas tax and RTP, should not be converted to non-motorized routes. Motorized funds are being diverted non-motorized projects and motorized funds have been used to construct motorized trails but then those trails are converted to non-motorized. This objective is necessary in order to work towards a 50/50 balance of opportunities and to address equity and fairness issues associated with the manipulation of motorized funds.

NGO-CTVA-39: Analysis in Chapter 4 addresses impacts of OHV designations. Further impacts of designating routes and trails will be analyzed through the Transportation and Travel Management Plan process.

NGO-CTVA

Comments

Responses

NGO-CTVA-40

63. **NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** At a typical width of no more than 12 feet, the 1635 miles of existing roads in the Mt Hood NF covers about acres (1635 x 5280 x 12 / 43560). At a typical width of no more than 48 inches, the 7 miles of existing ATV trails cover about 3 acres. At a typical width of no more than 24 inches the 43 miles of existing motorized single-track trails cover about 10 acre. The total area of the Mt Hood NF project area is 1,108,000 acres. The percentage of the total forest used by roads, ATV trails, and single-track motorcycle trails is respectively, 0.2229%, 0.0003%, and 0.0010%.

NGO-CTVA-40 See response to NGO-CTVA-25.

The total area used by motorized routes under the existing condition is 2,932 acres or 0.2242% of a 1,067,000 acre area. Therefore, the area used by existing routes is relatively insignificant and is an entirely reasonable level of use on multiple-use lands. The reduction under the proposed action produces a significant impact on the public's ability to access and recreate and is not a reasonable level of use for lands designated for multiple-use by congress.

Acres and % of Forest for Existing Motorized Routes				
Total Project Area (acres) =		1,067,000		
	Miles	Feet width	Acres	% of Forest
Miles of road	1,635.0	12	2378.18	0.2229%
Miles of ATV	7.0	4	3.39	0.0003%
Miles of Motorcycle	43.0	2	10.42	0.0010%
		Total	2392.00	0.2242%

- 64. In a recent article ([http://www.helenair.com/articles/2008/08/01/national/80na\\_080801\\_drill.prt](http://www.helenair.com/articles/2008/08/01/national/80na_080801_drill.prt)) about a lawsuit regarding drilling in New Mexico on the Otero Mesa, the BLM manager stated "While up to 90 percent of BLM lands are open to drilling under the plan, Childress said only 800 to 900 acres of Otero Mesa's 1.2 million would be permanently disturbed by roads, footpads and other drilling related activities. 'I think that's a pretty reasonable percentage,'" he said." We agree and find that this is a relatively insignificant percentage of the total area and quite acceptable management for multiple-use lands.
- 65. National OHV criteria and standards are not entirely applicable to conditions in the Winnemucca Resource Management area, i.e. one size does not fit all. The analysis needs to allow for judgment on site specific conditions so that the decision is a better match for local conditions and customs which center on motorized access and motorized recreation.
- 66. The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles.
- 67. Because of the significant impacts on motorized recreationists that are being proposed as part of the Southeastern Resource Management area and because of the significant cumulative effect on motorized recreationists of all past and reasonably foreseeable motorized closures, the proposed action is beyond the scope of an environmental assessment and an environmental impact statement must be prepared.

NGO-CTVA-41:  
See proposed action D-R 10.2 and D-R 10.3

NGO-CTVA-41

68. Specific references from the new National OHV Policy that must be adequately addressed include:

The Transportation and Travel Management Plan will be required to be in conformance with all applicable federally established regulations and policy governing OHV management on public lands.

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Page 20 of 152*

## NGO-CTVA

## Comments

## Responses

*Existing – The unit or district restricts motor vehicles to “existing” routes, including user-created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use.*

*For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management.*

*To create a comprehensive system of travel management, the final rule consolidates regulations governing motor vehicle use in one part, 212, entitled “Travel Management.” Motor vehicles remain a legitimate recreational use of NFS lands.*

*This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on National Forest System lands; address needs for access to National Forest System lands; and preserve areas of opportunity on each National Forest for nonmotorized travel and experiences.*

Clearly the rule intended to identify existing routes being used for motorized access and recreation and preserve existing non-motorized routes by elimination of cross-country travel. Additionally, the rule preserves existing non-motorized routes by not allowing them to be converted to motorized routes and it does not state anywhere that non-motorized travel and experiences were to be significantly enhanced by a wholesale conversion of motorized routes to non-motorized routes. We request that the intention of the final OHV Route Designation rule be followed by the Winnemucca Resource Management Plan Revision and that the rule not be used inappropriately as an action to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes. Why is a process that was intended to eliminate cross-country travel and designate existing motorized routes been allowed to turn into a massive closure process?

69. A reasonable goal for the allocation of trails should be 50/50 sharing and equal opportunity of motorized/non-motorized trails. Remember that 25:1 motorized/non-motorized is justified based on actual usage. The proposed plan is way out of balance with the split of routes meeting the definition of a motorcycle or ATV trail. We request that a more reasonable proposal be developed.
70. The thousands of motorized recreationists that use the existing network of motorized routes should not be displaced for a handful of non-motorized recreationists that use these routes yet this is exactly what is proposed. Preferential treatment for non-motorized recreationists must cease and mitigation for past motorized closures must be implemented.

NGO-CTVA-42:

Route and trail designations will be further addressed & brought forward in the subsequent Transportation & Travel Management Planning processes.

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*Page 21 of 152*

NGO-CTVA	Comments	Responses
NGO-CTVA-43	<p>71. In order to be responsive to the needs of motorized recreationists, the plan should specifically allow for amendments as required to create new trails, connect trails to create motorized loops, extend trails, make minor boundary adjustments to allow a motorized trail, etc.</p> <p>Issue: Given the evidence in support of continued use of existing motorized routes and the need for additional motorized routes, the extent of the motorized closures in the proposed alternative is clear evidence that the agency is predisposed to motorized closures despite the needs of the public and the facts.</p> <p>Issue: The BLM and Forest Service have created very serious disclosure issues that are producing a growing wide-spread distrust of the agencies. The National OHV Policy, forest planning, resource management planning, and travel planning processes were never presented to motorized recreationists as massive motorized closure processes but in practice that is what they are. In fact, the National OHV Policy was presented as a positive agreement and action that would recognize the legitimate use of existing motorized routes. Our society expects public agencies to assess and provide for their needs as demonstrated by the adequate water, sewer, and roads systems; and other public facilities that are routinely provided. We are very concerned about the growing animosity towards the agencies and urge you to address this issue. Much of this distrust originates from a failure to honor past agreements and/or the lack of adequate disclosure of the true intent of the agencies actions. We urge you to recognize the need for sincere disclosure followed by accurate assessment of the needs of motorized recreationists and the decisions required to provide for those needs.</p>	NGO-CTVA-43: See responses to NGO-CTVA-I and NGO-CTVA-2
NGO-CTVA-44	<p>Issue: Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to inter-connect to OHV routes. Dual-use is essential for the family OHV experience. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing.</p> <p>Issue: The summary dismissal of dual-use designations is neither reasonable nor acceptable per NEPA requirements. Dual-use of routes is a significant issue to us because OHVs cannot use the limited trail system provided by the proposed alternative without traveling on forest roads. In other words, this part of the proposal alone renders the entire the project area off-limits to OHV use. This outcome is not a reasonable solution for a travel plan and we request that the issue and need be adequately addressed and a revised proposal developed.</p>	NGO-CTVA-44: See responses to NGO-CTVA-25 and NGO-CTVA-28

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*Page 22 of 152*

## NGO-CTVA

## Comments

## Responses

## Issue:

It is not reasonable to assume that dual-use designation can be addressed after the travel planning decision is made because that has never happened in our region.

## Issue:

No dual-use designations means that family oriented OHV recreation in the area will be eliminated. Family OHV recreation is extremely important to us and the southern area of the project provides an ideal setting for family use with fairly easy routes located away from busy traffic areas and vista points. We request that dual-use or unrestricted width trail designation be used for all of the motorized routes except single-track trails.

## Issue:

Without the dual-use designation, the proposed action would transform family OHV trips from a healthy family oriented recreation to an illegal activity. This is not a reasonable nor acceptable outcome.

## Issue:

The continual closure of motorized trails has forced OHVs to be operated on forest roads in order to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures and then combined with the lack of a reasonable system of roads and trails with dual-use designation have not been adequately considered in past evaluations and decision-making. We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past.

## Issue:

In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trail systems, then the need to create illegal trails would be greatly diminished. Therefore, the catch-22 of the closure trend is that in the end it feeds the illegal activity. In other words, it would be a more advantageous and equitable situation to pro-actively manage motorized recreation.

## Issue:

While we support the BLM designated route rule, we are very concerned that, as currently implemented, it discriminates against motorized recreationists. The designated route rule requires motorized recreationists to identify and defend the use of every route that they would ever hope to use during their lifetime by involvement in a very complicated travel planning process in a very limited time frame. The route designation process requires that a Montana resident who might plan to visit another corner of the state or other states be involved and provide documentation of those routes in order to enjoy them at some time in the future. Documenting and being involved in the number of actions and schedule referenced above is an impossible effort for individual motorized recreationists. Additionally, a national level motorized group capable of taking on this level of involvement does not exist. At the same time, non-motorized recreationists are not held to the same standard. Non-motorized recreationists can simply do nothing and reap the benefit of gaining trails

NGO-CTVA-45: See responses to NGO-CTVA-25 and NGO-CTVA-28.

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*Page 23 of 152*

NGO-CTVA-45

## NGO-CTVA

## Comments

## Responses

closed to motorized recreationists by the route designation process. Therefore, the route designation process and travel planning actions must include an effective mitigation process that will meet the requirements of the designated route rule and not put an unreasonable burden on motorized recreationists. The following comments include many suggestions on how the needs of motorized recreationists can be determined by the agency including the reasonable alternative of employing an adequate number of OHV enthusiasts on NEPA compliance, planning, design, and maintenance teams. We request that the process include an adequate mitigation process to address this issue.

NGO-CTVA-46

## Issue:

The Bureau of Land Management has only addressed less motorized access and less motorized recreational opportunities. The alternatives formulation and decision-making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities.

## Issue:

The existing level of motorized access and recreation cannot be dismissed because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.

## Issue:

A reasonable alternative that must be adequately addressed is the existing level of motorized recreational opportunities plus mitigation projects to protect the environment from existing problem areas, mitigation for past motorized closure cumulative effects, and enhancement for growth.

NGO-CTVA-46: See response to NGO-CTVA-1.

NGO-CTVA-47

## Issue:

The Ravalli County Off-Road Users Association has found that "at the end of 2006, there were approximately 2500 "stickered" OHV's in Ravalli County. For the past five years, the growth rate of "stickered" OHV's has been about 20% per year. If this growth rate continues, the number of OHV's in the forest will double every four years. On the Bitterroot National Forest there have been no new OHV "system" routes designated for OHV travel since 1996. History, experience and common sense tell us that when adequate, responsible, sustainable routes with attractive destinations are provided, OHV enthusiasts will ride responsibly. On the Bitterroot National Forest this means more routes, not more restriction."

The same analysis must be done for the Winnemucca Resource Management area and it will find the same no growth trend and a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth.

NGO-CTVA-47: A separate Travel and Transportation Management Plan will be developed – See D-R-10.2. Data would be collected for this plan.

NGO-CTVA-48

## Issue:

It is not environmentally and socially responsible to squeeze motorized recreationists into the small possible numbers of areas and routes, yet this is the goal being pursued by the Winnemucca Resource Management Plan. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be adequately addressed.

## Issue:

NGO-CTVA-48: See CTVA-47. Impacts to public health and safety are addressed in section 4.5.2.

NGO-CTVA

## Comments

## Responses

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** The typical use of public lands and the typical needs of the public in our region are described on Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002

([http://www.fs.fed.us/r1/b-d/forest\\_plan/revision/reports\\_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf](http://www.fs.fed.us/r1/b-d/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf)). This document reported that the total number of forest visitors in Forest Service Region 1 for year 2000 was 13,200,000. The total number of wilderness visits was estimated at 337,000 or 2.55%<sup>3</sup>. Therefore, millions of visitors to public lands (nearly all at 97.45%) benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations of visitors enjoying motorized access and mechanized recreation on public lands.

An important note, agency planning staff has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.

The total number of individuals that visit our national forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service, November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% (56 million/286 million) of the total U.S. population actually visits our national forests. This number needs to be used as the denominator (baseline) for total forest visitors.

Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech which stated "Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000." We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (<http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf>). This document reports that the total number of OHV users has grown to 49.6 million by the fall 2003/spring 2004. Based on the 2000 estimates OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).

This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000) titled Outdoor Recreation Participation in the United States (<http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf>) which asks the question "During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?" The percent responding "Yes" was 63.1% and the total number in millions was estimated at 130.8 million. Additionally, NSRE is often referenced by the agency but the summary statistics are

<sup>3</sup> It is revealing that this report chose to present and emphasize wilderness visits which were the minority statistic at 2.55% and ignore the fact that the overwhelming majority of the visitors (97.45%) are multiple-use and, therefore, the greatest need is for multiple-use recreational opportunities. This is an example of a predisposition in the presentation of the facts that has crept into the recreation resource allocation process.

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*Page 25 of 152*

NGO-CTVA-49: See response to NGO-CTVA-47.

## NGO-CTVA

## Comments

## Responses

skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation and if they are added together they are as large as any other group in the survey which correctly demonstrates the magnitude of motorized recreation.

Additionally, the Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States ([http://www.fs.fed.us/recreation/programs/ohv/OHV\\_final\\_report.pdf](http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf)) determined that of the total U.S. population in the West 27.3% participated in OHV recreation and that out of the total population in Oregon 22% participated in OHV recreation or 581,500 individuals.

These surveys and data demonstrates the significant popularity of motorized and OHV recreation and the tremendous public support and need for motorized and OHV recreational opportunities. We maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the national forest visiting the forest 5 or more days per year. The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities.

## Issue:

The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States ([http://www.fs.fed.us/recreation/programs/ohv/OHV\\_final\\_report.pdf](http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf)) determined that out of the total population in Oregon 22.8% or 581,500 individuals participated in OHV recreation. These numbers demonstrate the immense popularity of OHV recreation. These numbers demonstrate that there are not enough existing motorized recreational opportunities. These numbers demonstrate that the agency's motorized closure trend is contrary to the needs of the public. The magnitude of the number of motorized recreationists is real. The misrepresentation of visitor numbers must be discontinued. Proper emphasis must be given to motorized recreation. Additionally, the agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law, the NEPA process should be driven by issues and needs and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service as a public agency will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests including individuals and families are largely ignored. The agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 581,500 motorized and OHV recreationists. The current conditions do not adequately meet these needs in a multiple-use area that is ideal for motorize use.

## Issue:

The agency should bolster its legal staff by retaining private law firms to defend their multiple-use land management decisions.

## Issue:

*We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.*

*Page 26 of 152*

## NGO-CTVA

## Comments

## Responses

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** Access to and use of public land should be the highest of priorities for multiple-use lands. However, current decision-making is out of touch with these priorities. The minority interests (non-motorized recreationists) are recipients of new recreational opportunities with each decision while the majority interests (motorized recreationists) lose opportunities with each decision. The evaluation and decision-making must take into account that the total area of the National Forest equals 192,300,000 acres and out of that total 44,919,000 acres or 23.36% is already designated wilderness. Current forest planning actions seek to convert roadless lands to defacto wilderness even though they are designated multiple-use lands. Therefore, this percentage will be even more lopsided toward non-motorized opportunities at 53.79% assuming that 58,518 acres of roadless areas are converted to defacto wilderness areas and managed for non-motorized recreation. We maintain that the management of all of the remaining 147,381,000 congressionally designated multiple-use acres (including roadless) or 76.64% of the forest should be managed for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 96.41% of the public who visit our National Forests for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, does not provide a proper allocation of multiple-use recreation opportunities and does not meet the laws requiring multiple-use management of these lands.

NGO-CTVA-50: See responses to NGO-CTVA-1 and NGO-CTVA-25

## Issue:

The Forest Service and BLM do not have the authority to create de-facto wilderness. It is critical that the agency differentiate between the powers of rule promulgating and enforcement agencies (like the BLM and Forest Service) and our federal rulemaking body (Congress). Rulemaking agencies cannot create areas that are wilderness in all but name. Wilderness study areas and non-motorized areas are managed as wilderness areas and are simply a mechanism to evade the measures set forth in the Wilderness Act. If these lands are important wilderness-type lands, then the agency must follow the laws set forth in the Wilderness Act (Public Law 88-577 - 16 U.S. C. 1131-1136) including:

*Presidential recommendation to Congress. The President shall advise the United States Senate and House of Representatives of his recommendations with respect to the designation as "wilderness" or other reclassification of each area on which review has been completed, together with maps and a definition of boundaries...*

*Congressional approval. Each recommendation of the President for designation as "wilderness" shall become effective only if so provided by an Act of Congress.*

## Issue:

There simply is no justification for creating more wilderness or defacto wilderness areas on our forests. If forest management continues to allow anti-access groups to use the travel planning process to further their agendas the travel plan will certainly fail! It should not be the purpose or intent of the travel planning process to exclude OHV travel or to crowd these users into small areas. To do so will produce unacceptable impacts on the forest and ultimately result in inappropriate use brought on by the travel plan itself.

NGO-CTVA-51: OHV alternatives proposed in RMP do not create de facto wilderness areas.

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*Page 27 of 152*

NGO-CTVA	Comments	Responses
NGO-CTVA-52	<p>Issue: Additionally the decision must consider that non-motorized recreationists have the opportunity to go not only to designated wilderness areas but anywhere while the opportunities for motorized recreationists are limited to designated routes in a small portion of multiple-use areas.</p>	NGO-CTVA-52: Access will be addressed through the Transportation and Travel Management Plan process.
NGO-CTVA-53	<p>Issue: <b>NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.</b> The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. Designation as wilderness is further out of touch with the needs of the public because recreation is not a stated purpose of the wilderness act and, therefore, recreation in wilderness area can not and should not be emphasized. Note that we could oppose any recreation development in wilderness areas in retaliation to non-motorized groups that go after our recreation opportunities but we have chosen not to do so. Recreation is a stated purpose in the multiple-use laws and, therefore, should be emphasized in the purpose and action.</p>	NGO-CTVA-53: RMP is not proposing any areas to be designated as Wilderness.
NGO-CTVA-54	<p>Issue: <b>NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.</b> If Roadless acres are included in this total, it becomes even more unbalanced with at total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors.</p> <p>Issue: <b>NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.</b> The evaluation must adequately consider and address the fact that motorized access to the national forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available to non-motorized recreationists. The total route opportunity available to non-motorized recreationists is 510,575 miles, the total miles of exclusive non-motorized trails are 93,088 or 75% of the existing total. The miles of non-motorized cross-country opportunity are infinite.</p> <p>The total miles of roads open to motorized recreationists are 286,445 and the total miles of trails open to motorized recreationists are 31,853 or 25% of the existing total. The cross-country miles are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in the national forest system is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.</p> <p>Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was</p>	NGO-CTVA-54: Distribution of motorized recreational opportunities will be addressed through the Transportation and Travel Management Plan process.

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*Page 28 of 152*

NGO-CTVA

Comments

Responses

assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system.

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
			Totals	184,015,484		305,634	786,445	124,941	31,853	15,526	66,007,245
						Miles of Open Road per Square Mile =	0.74				
						Total Roads and Trails Open to Non-Motorized Use, Miles =	93,080	510,575			
						Non-Motorized Trails, Miles =	93,080				
						Non-Motorized Trails, % =	74.51%				
						Motorized Trails, miles =		31,853	15,526		
						Motorized Trails, % =		25.49%			
						Trails Open to Motorcycles %				12.43%	

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

Issue:

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** The evaluation must adequately consider and address the fact that motorized access to the national forest in Region 6 is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available to non-motorized recreationists. The total route opportunity available to non-motorized recreationists in Region 6 is 108,109 miles, the total miles of exclusive non-motorized trails are 14,759 or 75.46% of the total existing miles of trail. The miles of cross-country opportunity are infinite. The total miles of roads open to motorized recreationists are 69,170 and the total miles of trails open to motorized recreationists are 4,800 or 24.545% of the total existing miles of trail. The miles of cross-country opportunity are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in Region 6 is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.

NGO-CTVA-55: See responses to NGO-CTVA-52 and NGO-CTVA-62

NGO-CTVA-55

NGO-CTVA

Comments

Responses

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Currently Open to Cross-Country Motor Vehicle Use	Acres
6	Deschutes	All	1,598,539	Open	11/9/2006	8,330	7,360	1,320	343	0	1,220,939	
6	Ochoco	All	852,073	Open	11/9/2006	2,962	1,949	230	9	0	704,727	
6	CrookedRiver	All	111,379	Existing	11/9/2006	318	309	81	18	0	0	
6	Fremont-Winema	All	2,300,189	Open	4/9/2006	12,663	11,427	407	8	0	2,021,869	
6	GiffordPinchot	CowlitzValley	575,000	Existing	11/9/2006	1,192	1,192	583	221	201	0	
		SBHelms	426,300	Existing	11/9/2006	594	594	504	45	45	0	
		MAdams	367,000	Existing	11/9/2006	557	557	409	20	10	0	
6	MtHear	All	1,708,688	Open	12/9/2006	9,658	6,948	262	47	47	1,365,743	
6	MBaker-Snoqualmie	All	1,752,114	Open	11/9/2006	2,584	1,832	1,225	117	117	1,022,114	
6	MtHood	All	1,069,859	Open	9/9/2006	1,984	1,635	1,040	50	43	752,524	
6	Olympic	HoodCanal	361,045	Existing	11/9/2006	1,278	991	180	25	25	0	
6	Olympic	Pacific	272,632	Existing	11/9/2006	900	549	49	1	1	0	
6	RogueRvr-Siskiyou	All	1,724,300	Open	7/9/2006	5,306	3,802	994	376	152	748,900	
6	Stustav	All	630,000	Open	9/9/2006	2,290	1,975	150	0	0	563,186	
6	Umatilla	pmroyWWNFk	1,196,245	System	9/9/2006	4,707	2,306	671	267	71	0	
		Heppner	210,000	Open	9/9/2006						90,396	
6	Umpqua	CottageGrove	86,966	Open	9/9/2006	475	383	55	45	0	86,966	
		Tiler	325,831	Open	9/9/2006	1,743	1,284	114	20	0	297,171	
		DiamondLake	316,400	Open	9/9/2006	1,144	621	254	62	0	254,375	
		NorUmpqua	255,198	Open	9/9/2006	1,373	1,121	103	66	0	246,791	
6	Wallowa-Whitman	All	2,264,209	Open	9/9/2006	9,290	7,600	2,675	1,784	0	901,160	
6	Wenatchee	Naches	2,300,000	Open	11/9/2006	1,572	1,309	1,042	261	135	1,300,000	
		Chadum		Open	11/9/2006	1,331	1,018	1,242	343	207		
		WenatcheeR		Open	11/9/2006	1,431	999	1,212	145	133		
		Enlat		Open	11/9/2006	1,110	717	406	229	229		
		Chelan		Open	11/9/2006	346	283	662	50	50		
6	Okanogan	MethowValley	1,700,000	Open	11/9/2006	1,595	1,080	1,223	25	25	600,000	
		Tonasket		Open	11/9/2006	1,120	712	226	5	0		
6	Wiamette	All	1,600,000	Open	1/9/2006	6,000	6,000	1,600	78	45	620,000	
6	Colville	All	1,096,020	Open	10/7/2006	4,387	2,542	470	140	130	954,689	
6	ColumbiaRiverNSA	All	78,900			130	95	170	0	0	64,400	
		<b>Totals</b>	<b>25,178,885</b>			<b>88,550</b>	<b>69,170</b>	<b>19,559</b>	<b>4,800</b>	<b>1,726</b>	<b>13,815,400</b>	
							Miles of Open Road per Square Mile =	0.78				
							Total Roads and Trails Open to Non-Motorized Use, Miles =	<b>108,109</b>				
							Non-Motorized Trails, Miles =	<b>14,759</b>				
							Non-Motorized Trails, % =	<b>75.46%</b>				
							Motorized Trails, miles =	<b>4,800</b>		<b>1,726</b>		
							Motorized Trails, % =	<b>24.54%</b>				
							Trails Open to Motorcycles %			<b>8.82%</b>		

<http://www.fs.fed.us/recreation/programs/ohv/>  
[http://www.fs.fed.us/recreation/programs/ohv/trail\\_mgmt\\_schedule.pdf](http://www.fs.fed.us/recreation/programs/ohv/trail_mgmt_schedule.pdf)

NOTE: This data is out of date by at least 4 years and does not reflect significant motorized closures that have occurred since this table was put together.

Issue:

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** Additionally, specific NVUM data for the Mt. Hood National Forest shows that there were 5,597,000 total site visits to the forest and only 129,000 wilderness visits ([http://www.fs.fed.us/recreation/programs/nvum/revised\\_vis\\_est.pdf](http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf)). Therefore, wilderness visits

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## NGO-CTVA

## Comments

## Responses

NGO-CTVA-56

in the Mt Hood National Forest are only 2.30% of the total visits yet past decisions by the Mt Hood National Forest and other Region 6 forests have produced both a disproportionately large and an increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 97.70% of the visitors are for the most part associated with multiple-uses. The public votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit regardless of whether they provide comments in a cumbersome NEPA process.

Issue:

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** The NVUM and Southern Research Station reports cited prove that there are 400,707 (1,377,000 forest visitors x 29.1% OHV) OHV visitors to the Beaverhead-Deerlodge National Forest and 15,000 wilderness visitors. The ratio of trail users is 26.71 motorized to 1 non-motorized yet the balance of existing trails is 33% motorized to 67% non-motorized. Clearly there is an imbalance of opportunity that justifies more (not less) motorized recreational opportunities.

NGO-CTVA-56: Visitor use, access, and distribution of motorized recreational opportunities will be addressed through the Transportation and Travel Management Plan process.

NGO-CTVA-57

Issue:

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.** As demonstrated by Table 3, the ratio of acres available to wilderness/non-motorized visitors versus the acres available to multiple-use visitors is way out of balance in the existing condition with 2.87 acres per wilderness visitor and 0.13 acres per multiple-use visitor for a ratio of about 23:1.

NGO-CTVA-57: See response to NGO-CTVA-52.

This proposed action, including the conversion of roadless to non-motorized, makes this inequity even worse by providing 3.78 acres per wilderness visitor and 0.11 acre per multiple-use visitor for a ratio of about 36:1.

The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor are significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.

**Table 3 Acres per Forest Visitor and Ratio**

## NGO-CTVA

## Comments

Total Annual Forest Visitors =	5,597,000
Wilderness Visitors =	129,000
Multiple-use Visitors =	5,468,000
Forest Acreage =	1,067,000
Existing Wilderness Acreage =	370,000
Existing Multiple-use Acreage =	697,000
Proposed Defacto Wilderness Acreage =	118,000
Total Proposed Defacto Wilderness =	488,000
Total Proposed Multiple-use Acreage =	579,000
Existing Acres/Wilderness Visitor =	2.87
Proposed Acres/Wilderness Visitor =	3.78
Percent Increase =	32%
Existing Acres/Multiple-use Visitor =	0.13
Proposed Acres/Multiple-use Visitor =	0.11
Percent Decrease =	-17%
Existing Ratio of Defacto Wilderness to MU Acres per Visitor	22.50
Proposed Ratio of Defacto Wilderness to MU Acres per Visitor	35.73
Note 1: Total Proposed Defacto Wilderness includes all Roadless Areas which the Agency is inappropriately managing as non-motorized.	
Note 2: The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.	

## Responses

## Issue:

We recognize the desire for a quiet experience in the forest as a legitimate value. To varying degrees, we all visit the forest to enjoy the natural sounds of streams, trees, and wildlife. Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, i.e, wilderness areas.

Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area. Given that vast areas of our forests have been set aside for the exclusive benefit of this relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs.

NGO-CTVA-58 | Congress has designated \_\_\_\_% (need BLM to provide data) of the Winnemucca Resource area as wilderness and designated the remaining \_\_\_\_% (need BLM to provide data) for multiple-uses. The Winnemucca Management Plan must not be yet another action that is contrary to the needs of the public and the directions given by congress. Where will all of the motorized closure proposals end? We know the answer and it is "permanently eliminated" unless the inappropriate direction and actions being pursued are corrected. While the agency's have a responsibility to self-correct, that self-correction is not happening. We request that the correction begin with this action.

## Issue:

The Debate section of the April 2008 issue of Costco Connection (<http://www.costcoconnection.com/connection/200901/?u1=tehterity>) asked the question "Are we doing enough to protect our national wilderness?" Results were reported in the May 2008 issue with

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*Page 32 of 152*

NGO-CTVA-58: FLPMA is the congressional mandate that gives BLM discretionary authority granted by the Secretary to manage public lands. FLPMA requires BLM to manage public lands in a manner that protects resources values while still providing for multiple uses. (FLPMA Sec. 102(8) and Sec. 103(c).

A range of alternatives has been presented in the RMP identifying areas open, closed, or limited to OHV use. A separate travel management implementation plan would be developed following the completion of the RMP process.

## NGO-CTVA

## Comments

## Responses

75% of the respondents answering Yes and 25% responding No. Clearly this demonstrates that the overall public opinion is that an adequate amount of our wilderness areas are protected under current conditions.

## Issue:

Over 50% of the public land is managed by wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access and motorized recreation. It is more reasonable and fair to allow continued motorized use of existing routes in inventoried roadless and wilderness study areas until such time as congress approves the area as wilderness. The courts have already established this precedent as supported in Judge Molloy's ruling in 2001 on the Montana Wilderness Study Act and the Big Snowy Mountains travel plan which was upheld in 2006. This commitment was recently upheld as part of appeal Number 07-05-10-0005 dated January 10, 2008 for the Smith River NRA travel management plan in the Six Rivers National Forest filed by Blue Ribbon Coalition (<http://www.sharetrails.org/releases/media/?story=556> and [www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf](http://www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf)). Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use.

## Issue:

1. In addition to the studies cited above, we have observed that 97% of the visitors to multiple-use areas are enjoying multiple-use activities based on motorized access and motorized recreation as shown in Table 1.

Table 1

NGO-CTVA-59: See response to NGO-CTVA-1.

NGO-CTVA

Comments

Responses

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS											
Date	Vehicles Motorized Access (Note 1)	OHV/Snow	FWD/Woodc	MTN Bike	Equestrian	X-C Skiers	Hikers / Runners	General Area/Comment	Vehicles at Hiking Trailhead (Note 2)	National Forest	
1999	5	342	37	11	10	0	25	See specific years and notes below		0	
2000	11	223	49	26	3	7	15	See specific years and notes below		0	
2001	433	425	58	28	36	3	12	See specific years and notes below		15	
2002	626	499	87	72	23	7	23	See specific years and notes below		46	
2003	904	651	17	66	18	10	27	See specific years and notes below		26	
2004	869	571	62	21	13	19	11	See specific years and notes below		35	
2005	1,322	847	89	38	29	6	20	See specific years and notes below		80	
2006	990	655	55	21	7	0	35	See specific years and notes below		18	
2007	948	603	27	42	22	17	2	See specific years and notes below		69	
2008	1,437	690	38	39	10	30	24	See specific years and notes below		12	
2009	1,227	894	85	35	7	17	4	See specific years and notes below		59	
2010	0	0	0	0	0	0	0	See specific years and notes below		0	
Column Total	8,772	6,400	604	399	178	116	198			360	
Total Observations on Multiple-Use Lands									16,667		
Mechanized Total									16,175	Non-mech Total	492
Mechanized %									97%	Non-Mech %	3%

Note 1: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.  
 Note 1: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.  
 Note 1: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.  
 Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of use but are not counted because they are not visiting multiple-use  
 Data Source: Capital Trail Vehicle Association

Our observations of recreationists on multiple-use public lands from 1999 through 2009 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 16,667 observations, 16,175 recreationists or 97% of the visitors were associated with motorized access and multiple-uses. Additionally, of the total number of people visiting public lands, 38% (6400 / 16,667) were associated with OHV recreation. **Furthermore, and most importantly, out of the 7,291 (6400 + 399 + 178 + 116 + 198) visitors that we observed using trails, 6,400 or 88% were OHV recreationists and 891 or 12% were non-motorized recreationists which includes mountain bikes which are a form of mechanized travel (8:1 motorized versus non-motorized and 13:1 mechanized versus non-motorized).** Therefore, nearly all (97%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations. **Therefore, 88% of the trail users are motorized and 93% when including mountain bikes and consequently, at least 88 to 93% of the trails system and public land should be managed for multiple-uses including motorized access and recreation.**

Issue:  
 Out of the 16,667 recreationists that were observed, 198 were hikers and all of the meetings were pleasant. We have not experienced any user conflict in ten years of observations.

Issue:  
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 Page 34 of 152

NGO-CTVA-60: See response to NGO-CTVA-56.

NGO-CTVA-60

## NGO-CTVA

## Comments

## Responses

**NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE WINNEMUCCA RMP AND EIS PROJECT AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES.**

Based on our estimate that 40% of the visitors are OHV recreationists, we estimate using the NVUM data for total visitors that the total number of OHV related visits to the Wallowa Whitman National Forest is  $224,000 = (560,000 \times .40)$ . Given the 320 miles of existing motorized trails, there are 126 ( $224,000 / 320$ ) OHV visitors per mile of motorized trail or 1 OHV visitor every 42 feet. Given the 891 miles of non-motorized trail and 48,000 wilderness visitors, there are 4 ( $48,000 / 891$ ) non-motorized visitors per mile of trail or 1 motorized visitor every 98 feet. This imbalance of opportunity cannot be considered equal program delivery and the proposed action must address this significant issue by creating more motorized trails.

## Issue:

There is a serious inaccuracy between the agency's representation of motorized versus non-motorized trail use and actual trail use that must be resolved. The routes in the project area are predominantly used by motorized recreationists. We see this actuality every weekend. Site specific trail use observations such as ours must be used and will easily justify motorized use of all existing routes.

## Issue:

The agency does not observe visitors on weekends and holidays and consequently is unaware of actual visitor usage. The agency simply needs to go out and count the different recreationists and mode of access on multiple-use lands on any weekend. This is what we have done and our data is an accurate representation of actual visitor usage on multiple-use lands. Additionally, the public votes by how they use the forest, and our observations document that more motorized access and recreation is what they are asking for with every visit.

We are quite confident that if Forest Service staff rode a dual-sport motorcycle and hiked around the forest on multiple-use roads and trails during the weekends and recorded their observations that they could duplicate this data and the conclusions found in the table above. We feel very strongly that the current approach and data used by the agency to represent the historic public use of multiple-use lands does not provide an accurate representation and that the table of observations above is a more reasonable representation.

## Issue:

The Travel Planning Process allows closure of a route due to user conflicts. It is our position that such conflict can be resolved by closing the route to either conflicting party. It is inappropriate that conflicts always be resolved by closure to motorized users. Closure to hikers or stock users is an equally effective resolution. According to NVUM data, 16% of all forest visitors list hiking as their primary activity. Yet few of these so-called "Quiet" users actually require a quiet experience as evidenced by the fact that fewer than 4% of all forest visitors go into Wilderness areas where they are guaranteed a quiet experience. For people who absolutely require a quiet experience it is reasonable to expect that they should take advantage of the wilderness and designated non-motorized areas.

## Issue:

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Page 35 of 152

NGO-CTVA-61

NGO-CTVA-61: See response to NGO-CTVA-52 and NGO-CTVA-12.

NGO-CTVA-62

NGO-CTVA-62: See response to NGO-CTVA-25.

	NGO-CTVA Comments	Responses
NGO-CTVA-63	<p>Telephone or other off-trail surveys to establish the percent of visitors who are hiking are inaccurate because everyone will respond that they “hike” but it may only be from the tent to the outhouse or a ¼ mile out in a meadow or a two mile roundtrip. Surveys have not established whether the respondent actually hikes any appreciable distance or uses a specific route. Surveys based on actual observations of activity in the field are a far more accurate determination. Surveys must ask how far did you hike, how long did you hike, and did you use a trail? Once accurate survey information is compiled then it will establish that the majority of hiking experiences are less than 1 mile and that many hikes do not involve trails. This accurate information must be developed immediately and hiking trails should be reduced to meet the factual level of need and use.</p> <p>Issue: NVUM surveys are conducted in a manner on major roads that does not intercept many OHV recreationists. Additionally, in the two NVUM surveys that we have participated in, several OHVs passed by the station and no attempt was made to survey them. To more accurately reflect motorized use NVUM surveys should survey OHVs passing through the station and count vehicles and types of vehicles including the number of OHVs being transported. Additionally, NVUM surveys should also be conducted at OHV trailheads.</p>	NGO-CTVA-63: See response to NGO-CTVA-56 and NGO-CTVA-12.
NGO-CTVA-64	<p>Issue: Surveys conducted by Citizens for Balanced Use (CBU) in Bozeman (available upon request) show that motorized users travel on average 50 miles per day per visit to our public lands while non-motorized travel on average 2 miles per day per visit. Therefore, a quality experience for motorized recreationists requires about 25 times the amount of trail needed for non-motorized recreationists. The results of this survey shows a definite need for more trails for the motorized community yet the Bureau of Land Management is continuing to close trail after trail to motorized use. The ratio of motorized versus non-motorized trails should be 50 miles per day of use versus 2 miles per day of use or 25:1. Non-motorized proponents may say that the agency does not have an obligation to provide 25 times the miles of motorized trails. However, 95% of the visitors are motorized recreationists and the ratio of motorized versus non-motorized visitors is 95:5 or 19:1, so 25:1 is not an unreasonable goal.</p> <p>Issue: A poll conducted by the BlueRibbon Coalition (<a href="http://www.sharetrails.org/uploads/PL/GMUG/GMUG_Survey_Key_Findings.pdf">http://www.sharetrails.org/uploads/PL/GMUG/GMUG_Survey_Key_Findings.pdf</a>) found that the public widely opposed any further any further reductions in recreational access to the national forest. “Fully 73% of local residents say the Forest Service should not reduce public access on local National Forests. Sportsmen are particularly opposed, as 81% of the hunters and 76% of the anglers say the Forest Service should not change regulations to reduce access or increase roadless areas.”</p> <p>Issue: The number of NEPA actions is overwhelming. For example, each Bureau of Land Management and Forest Service jurisdiction publishes a NEPA Quarterly Report and there are typically at least 30 actions ongoing at any moment. We typically recreate in at least 5 to 6 Forest Service or BLM management areas. The number of NEPA actions at any moment that we would have to evaluate and comment on in order to be involved would total 150 to 180. Refer to Table 2 also. Recently the route designation process has added considerably to effort required. It is simply impossible for the public to comment on every road, trail, and NEPA document. If this is an over-arching strategy,</p>	NGO-CTVA-64: See response to NGO-CTVA-25.

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*Page 36 of 152*

## NGO-CTVA

## Comments

## Responses

then it is grossly unfair. It is not reasonable to expect working class citizens to comment on every NEPA action and the route designation that potentially affects them at some point during their recreation lifetime. At the same time, non-motorized recreationists can sit back and do almost nothing and reap the benefit of a system of almost automatic motorized closures. Basically, the current process discriminates against the working class because they work at least 40 hours per and cannot dedicate anywhere near enough hours required to keep up with all of the travel planning and route designation processes currently on the table.

## Issue:

NGO-CTVA-65 | The agency needs to emphasize data and real observations such as ours to establish public need and resources allocation versus paid representatives, attorneys, and form letter comments sent in by non-motorized groups because they are not an indicator of actual visitors to the project area. We ask that the evaluation and alternative development carefully consider the true needs of the public for multiple-use recreational opportunities as demonstrated by the references cited above and implement recreation resource allocation based on the large number of visitors that enjoy multiple-use and motorized recreational opportunities and the relatively small number of wilderness visitors.

NGO-CTVA-65: See response to NGO-CTVA-56 and NGO-CTVA-12.

NGO-CTVA-66

## Issue:

Resource allocation must include access to an equal number of quality recreational opportunities including alpine lakes, rivers, streams, and overlooks. We are not aware of any law that precludes motorized recreationists from enjoying equal access and allocation of the same resources that non-motorized recreationists enjoy. Equal opportunity laws, case law precedents and agency guidance have clearly established that the goal for the agency should be equal opportunity for all visitor groups. Motorized recreationists should have a reasonable allocation of quality recreational opportunities but they do not under existing conditions and the disparity must not be worsened by the proposed action.

NGO-CTVA-66: FLPMA section 102 (8) requires BLM to manage public lands in a manner to protect natural and cultural values while providing for outdoor recreation and human occupancy.

## Issue:

In order to be equitable, recreational resource allocation between wilderness/non-motorized visitors and motorized/multiple-use visitors should be based on equal ratios. Indicator ratios should include acres of wilderness/non-motorized areas divided by wilderness/non-motorized visitors and miles of wilderness/non-motorized trails divided by number of wilderness/non-motorized visitors versus acres of motorized/multiple-use areas divided by motorized/multiple-use visitors and miles of motorized/multiple-use trails divided by number of motorized/multiple-use visitors using the number of multiple-use and wilderness visitors from the references cited above.

NGO-CTVA-67

A reasonable approach to the assessment of equal recreational opportunity would use a comparison of acres and miles of trails per non-motorized visit versus acres and miles of trail per motorized visit. An equal number of acres and trail miles per visit should be the goal but the current management scheme is not achieving this goal. Clearly non-motorized visitors have a significant advantage in acres and miles of trail per visit at this time. Moreover, current management trends are creating more non-motorized acres and trails and significantly adding to the disparity. In order to be responsible to the public, we request that the preferred alternative address this disparity and reverse the trend by managing all of the project area as motorized multiple-use.

NGO-CTVA-67: See response to NGO-CTVA-1 and NGO-CTVA-66.

## Issue:

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*Page 37 of 152*

## NGO-CTVA

## Comments

## Responses

NGO-CTVA-68

We are very concerned that a built-in bias exists with visitor use monitoring data based on the fact that all wilderness visitors must sign-in in order to visit a wilderness area and at the same time there are no self-reporting opportunities for multiple-use visitors. Therefore, multiple-use visitor data does not exist because it is not collected or it is under-stated.

## Issue:

The process used puts the average working class citizen at a great disadvantage. The process is inordinately confusing, cumbersome and intimidating to the members of the public who are not organized or experienced which is the majority of the public. The process is inordinately demanding of participation and has unreasonable expectations for the involvement of individuals and families. A 300+ page draft environmental document is too much for the general public to understand and participate in. Coupled with the current number of other ongoing actions shown in Table 2 the situation is overwhelming. The size of the environmental document is being used as a mechanism to overwhelm the public and allow the agency to effectively ignore the needs of the public for motorized access and motorized recreation. Council on Environmental Quality regulations for the proper implementation of NEPA can be found at [http://ceq.eh.doe.gov/nepa/regs/ceq/toc\\_ceq.htm](http://ceq.eh.doe.gov/nepa/regs/ceq/toc_ceq.htm). Sec. 1502.7 Page limits. *The text of final environmental impact statements (e.g., paragraphs (d) through (g) of Sec. 1502.10) shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.* The agency is ignoring the page limit guidance and the documents produced are way beyond what the public can process. Again, this completely baffles and intimidates the public. A lengthy, unmanageable document especially impacts motorized recreationists and multiple-use interests because we have everything to lose in each action if we chose to ignore it while non-motorized recreationists can ignore the document and still have everything to gain.

## Issue:

Because of the long trend of motorized closures by the agency combined with the lack of acknowledgement of the needs of motorized recreationists or any action on those needs, most motorized recreationists have given up on the public involvement process. This should not be taken as an acceptance by motorized recreationists of the agency's direction and decision. Rather it is a huge socio-economic-environmental justice issue that was significantly ignored by the process and decision. The proper reaction to this condition would be to adequately address the comments that are received, develop alternative processes that would successfully get input from motorized recreationists, and then develop alternatives and actions that meet the needs of motorized recreationists.

## Issue:

On top of the sheer volume is the fact that the document does not address the significant issues affecting motorized recreationists. Just because the public cannot digest all of this paper or understand the process does not mean that the agencies are free to ignore the needs of the public. NEPA never intended for the process to take away the quality of human life for individuals and families but because the process is so overwhelming it is doing just that. Given these conditions, it is not reasonable to expect the level of unorganized public and working class citizen participation to be high. Given these conditions, the needs of the overall public must be carefully determined. The most equitable alternative to meet the public's needs would be a reasonable multiple-use alternative.

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*Page 38 of 152*

NGO-CTVA-68: See response to NGO-CTVA-56 and NGO-CTVA-12.

NGO-CTVA-22-69: Refer to response NGO-CTVA-37.

NGO-CTVA-69

NGO-CTVA	Comments	Responses
NGO-CTVA-70	<p>Issue: The results from most visitor use surveys do not directly or adequately reflect the importance of motorized access and mechanized recreation to the typical visitor to public lands. The importance and magnitude of motorized access and mechanized recreation is hidden and dispersed within a number of different categories including: viewing wildlife, birds, fish, etc. (motorized access); picnicking (motorized access); viewing natural features (motorized access); hunting (motorized access); fishing (motorized access); general/other (motorized access and mechanized recreation); driving for pleasure on roads (motorized access and mechanized recreation); hiking or walking (motorized access to trail heads); gathering mushrooms, etc.(motorized access); camping (motorized access); resorts (motorized access); visiting historic and prehistoric sites/areas (motorized access); nature study (motorized access); off-road vehicle travel (motorized access and mechanized recreation); downhill skiing (motorized access); cross-country skiing (motorized access); primitive camping (motorized access); backpacking (motorized access); visiting a nature center, etc. (motorized access); snowmobile travel (motorized access and mechanized recreation); motorized water travel (motorized access and mechanized recreation); other motorized activities (motorized access and mechanized recreation), horseback riding (motorized access); bicycling (motorized access and mechanized recreation); non-motorized water travel (motorized access); and other non-motorized activities (motorized access).</p>	NGO-CTVA-70: See response to NGO-CTVA-56.
NGO-CTVA-71	<p>Issue: Allowing travel up to 300 feet off of a designated route, both roads and trails, is an absolutely necessary opportunity for reasonable use of the area by the public. This access is needed for retrieval, woodcutting, and to reach dispersed campsites and the public's use of the area would be unreasonably compromised without this access. The use of this access can be qualified to restrict it in situations where it results in unreasonable resource damage.</p> <p>Issue: Dispersed campsites are very desirable camp sites. Closure of these sorts of dispersed campsites would have a very significant impact on the public and we request that they remain open. If water quality concerns are the basis for these closures, then there are reasonable alternatives to mitigate these concerns, such as allowing only self-contained camping units to use them. Additionally, a sense of magnitude needs to be applied when assessing the water quality impacts from camping. For example, it appears that cattle grazing along the stream have a much greater impact than any camp site that we observed. Now don't get us wrong, we support all reasonable multiple-uses of the forest including cattle grazing. We are concerned that the incremental impacts on the public of closing dispersed camp sites are relatively significant while the real improvement to the environment will be relatively insignificant. Again, we request that all reasonable camp sites located along water courses remain open.</p> <p>Issue: If dispersed camp sites are to be closed based on water quality concerns, then we request that the decision include a water quality monitoring program to establish the baseline water quality prior to the closure of dispersed camp sites and continue that program after the closure to establish whether any significant water quality improvement was realized. The decision should also include a provision to re-open closed camp sites when no significant improvement in water quality was realized by the closure.</p>	NGO-CTVA-71: Widths of designated routes would be developed as part of the Transportation and Travel Management Plan. Management within RMZs, including locations of camp areas, would be defined through a separate implementation planning and would include public involvement and a separate NEPA analysis.

## NGO-CTVA

## Comments

## Responses

NGO-CTVA-72	<p>Issue: In general there is a very high demand for camp sites and especially dispersed camp sites. If a dispersed camp site is closed, then we request that the closure be mitigated by creation of new camp sites on at least a 1:1 basis in order to avoid a significant cumulative effect on the public of too few camp sites.</p>	<p>NGO-CTVA-72: Management within RMZs, including locations of camp areas, would be defined through a separate implementation plan and would include public involvement and a separate NEPA analysis. Management of SRMAs and RMZs are provided in Recreation table 2-1 beginning at R-8.</p>
NGO-CTVA-73	<p>Issue: We are very concerned that the proposed plan tends to manage the forest as a national park and not as a national forest where multiple-use opportunities are sought in order to adequately meet the needs of the public. There is no mandate from Congress or the public to manage the project area as national park yet the proposed plan seeks to do that. We request that the project area including the semi-private areas, continue to be managed for multiple-use including motorized recreation.</p>	<p>NGO-CTVA-73: FLPMA mandates that the BLM administered land be managed for multiple uses.</p>
NGO-CTVA-74	<p>Issue: We read the recent KIPZ Forest Plan Revision Newsletter dated July 6, 2006 (<a href="http://www.fs.fed.us/kipz/documents/070606_kipznewsletter_issue9_color.pdf">http://www.fs.fed.us/kipz/documents/070606_kipznewsletter_issue9_color.pdf</a>) and we are very concerned about the misleading statement made in the newsletter. Under the 4<sup>th</sup> bulleted item on page 1, the statement is made <i>Therefore, the Proposed Plan will not open or close roads or trails; it only identifies the desired motorized/non-motorized condition.</i> Based on our experience, if routes are proposed for closure or an area is designated for non-motorized used under the forest plan, then it is all but a done deal when travel planning comes along later. The public is not aware that the forest planning process effectively closes motorized routes. Therefore, the current forest planning process puts motorized recreationists at a disadvantage because of the lack of understanding about its role in the travel planning process. It also puts motorized recreationists in the disadvantage of "double jeopardy", i.e. of having to protect motorized opportunities in both forest planning and travel planning processes. There are significant social and environmental justice impacts to motorized recreationists associated with this setting that must be addressed by this action.</p>	<p>NGO-CTVA-74: See responses to NGO-CTVA-2 and NGO-CTVA-37</p>
NGO-CTVA-75	<p>Issue: Timber harvests have included many motorized closures as associated actions. Many timber harvests such as those in the area of Treasure Mountain and Bison Mountain in HNF have had associated motorized closures that were done without adequately addressing the impact on motorized visitors. Many of these motorized closures were done as a concession to those opposed to the timber sales and without input from motorized recreationists. Many of the closures and obliterations included historic travel ways used for exploration, mining, and travel since the pioneer days. Planning actions must adequately address these impacts and re-open the routes that were unfairly closed.</p> <p>Issue: Forests are a renewable resource and impacts associated with cutting units are relatively short-lived. Therefore, motorized routes that were closed due to timber harvests should be reopened (returned to pre-harvest condition) now because the vegetation and cover has been reestablished. However, most of the motorized closures associated with cutting units have been long-term. All forest planning and travel management planning actions must now evaluate all past motorized closures including road and trail obliterations done to mitigate wildlife security concerns as part of timber harvest. It is logical and fair that once the harvest area has been re-vegetated, then the motorized closures must</p>	<p>NGO-CTVA-75: The RMP only allows for salvage harvesting of timber. Temporary OHV closures may be necessary for public safety. WD has few forest stands where this could occur.</p>

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*Page 40 of 152*

## NGO-CTVA

## Comments

## Responses

be lifted. Additionally, the cumulative negative impact of these types of closure actions on motorized access and recreation must be adequately evaluated and mitigated by this action.

## Issue:

The impact of OHV recreation on wildlife has been overstated by the agency and wildlife biologists. First, wildlife populations are at all time high at the same time when OHV use is increasing. If there is any impact to be identified, it appears that it should be that the positive impact associated with increasing OHV use and increasing wildlife populations. Secondly, OHV use does not kill wildlife. Wildlife coexists just fine with OHVs. This was recently confirmed again by a study in Yellowstone Park which found that "Most elk, bison and trumpeter swans barely reacted last winter to the presence of snow coaches and snowmobiles in Yellowstone National Park, according to a study released Tuesday. Scientists watched more than 2,100 interactions between over-snow vehicles and wildlife last year to try to determine how they responded. Of those, 81 percent of the animals had no apparent response or they looked and then resumed what they were doing, the study said" ([http://www.helenair.com/articles/2005/12/14/montana/a10121405\\_04.prt](http://www.helenair.com/articles/2005/12/14/montana/a10121405_04.prt) and <http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf>).

It appears that the disturbance of wildlife by OHV issue including wildlife corridors is being exaggerated to further the conversion of multiple-use lands to non-motorized lands. The agency is encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare (see additional references provided in later sections). In fact, areas that have been more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife.

## Issue:

Hikers and wolves impact wildlife more than OHV use yet hikers and wolves are unrestricted.

## Issue:

Some interests are pushing the wildlife corridor concept as a reason to close areas to motorized use. We have not seen adequate documentation or reasoning to justify this position and suspect that it is being used inappropriately as a reason to justify defacto wilderness by non-motorized interests. Significant issues must be answered before this concept can be given any credibility. Issues include:

1. Why would wildlife follow physically challenging basin divides where food and water is scarce versus other corridors? They don't. This is easily verified by open areas such as McDonald Pass or the jagged areas of the continental divide where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossings that we have observed in other areas that are more favored by wildlife.
2. There is no data or credible documentation that the continental divide or other basin divides are favored for wildlife migration. Especially theories that purport that wildlife will migrate from Mexico to Canada. This is counter to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support the wildlife corridor hypothesis.
3. The lack of authorization or mandate from congress for this sort of designation and use of public land.

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*Page 41 of 152*

NGO-CTVA-76

NGO-CTVA-76: Impacts to Wildlife from recreation use, including OHV is located in Chapter 4, section 4.2.9.

NGO-CTVA-77

NGO-CTVA-77: Wildlife corridors are addressed under Fish and Wildlife – Table 2-1. Action CA-FW 1.2. This RMP is not proposing Wilderness.

## NGO-CTVA

## Comments

## Responses

4. The socio-economic issues associated with the attempt to use the wildlife corridor concept to convert multiple-use lands to defacto wilderness.

## Issue:

While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the Act modified or repealed.

Recently, Utah Counties were challenged in court for their actions similar to the challenge at Jarbidge Road in Nevada. The foundation in both cases is the fact that the Counties even without a charter form of government have the authority to exercise rights afforded to them by the federal government. Until the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The recent decision rendered by the 10th circuit re-affirms this (<http://www.kscourts.org/ca10/datefile/datefile.htm> look under 9-8-2005, and then 04-4071 - Southern Utah Wilderness Alliance v. Bureau of Land Management).

The court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. Note that the Winnemucca Resource Management Plan project area includes many important RS 2477 routes. We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.

## Issue:

On August 16, 2006, a federal judge in Salt Lake City dismissed a decade old lawsuit designed to diminish or eliminate those public access rights. The lawsuit was filed in 1996 against the Bureau of Land Management in Utah by the Southern Utah Wilderness Alliance and the Sierra Club. In his ruling, the Utah District Court cited a 10th Circuit Court of Appeals decision. For info on that key decision please read: R.S. 2477: The Legal Battle Continues <http://www.sharetrails.org/magazine.cfm?story=705> . Joe Baird of the Salt Lake Tribune reports the news: Environmentalists: Court rules issue is settled, suit is moot [http://www.sltrib.com/utah/cj\\_4194188](http://www.sltrib.com/utah/cj_4194188)

## Issue:

Every planning action "re-invents" the line weights, color, and line styles for the different motorized and non-motorized road and trail designations. This is very confusing to the public and, once again, puts motorized recreationists at a disadvantage. A national mapping standard for travel planning actions must be developed starting with proposed action in order to address this inadequacy and the environmental justice issue associated with it.

## Issue:

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*Page 42 of 152*

NGO-CTVA-78

NGO-CTVA-78: Designation of OHV routes and trails would be addressed through the Transportation and Travel Management Plan process.

NGO-CTVA-79

NGO-CTVA-79: The Travel and Transportation plan will follow BLM guidance for consistency.

## NGO-CTVA

## Comments

## Responses

NGO-CTVA-80

Road decommissioning funds should be used instead to maintain motorized trails. We suggest that this expenditure would benefit the public and environment in a more positive way and have a more positive environmental impact.

NGO-CTVA-80: See response to NGO-CTVA-33.

NGO-CTVA-81

## Issue:

We are working hard to convince OHV recreationists to “tread lightly”. We have been informed that trails were closed because they “saw very little motorized use” as part of the BLM Sleeping Giant Travel Plan and Mormon Gulch timber harvest in the Beaverhead-Deerlodge National Forest. These actions would suggest that we should “power on” so that our tracks and usage are obvious. We think that it sets a bad precedent to close a route because it appears to see little use. It is not fair that motorized recreationists practice “tread lightly” principles and are then penalized for following that practice. Additionally, forces including cattle grazing, horses and wild animals, and rain quickly obliterate motorcycle tracks. We observed this condition again recently when the tracks of 7 motorcyclists that we observed using a single track trail were quickly erased with one light rain shower.

NGO-CTVA-81: See response to NGO-CTVA-25.

## Issue:

If light use is being used as a criterion to close motorized routes, then it would also seem fair to convert non-motorized trails that see light use to motorized routes in order to address the concern of over-usage and shortage of motorized routes. We ask for your consideration of this reasoning.

NGO-CTVA-82: See response NGO-CTVA-2.

NGO-CTVA-82

## Issue:

Because of the cumulative negative effects of the motorized closure trend, the recreational opportunities for motorized recreationists is dramatically being reduced to a limited number of motorized routes and the lesser used routes are becoming hard to find and, therefore, they must be considered invaluable to motorized recreationists. The level of use should also be evaluated along the logic that the most valuable motorized routes now days are the ones that are remote and see less use. Therefore, barely visible 2-track roads and single-track trails are invaluable to motorized recreationists and must be evaluated as such. Motorized recreationists are struggling to keep a reasonable spectrum of opportunities available and one piece of that spectrum are remote and lesser used routes. In a constantly losing scenario, every remaining motorized recreational opportunity is important to motorized recreationists.

## Issue:

We were again reminded recently of the cumulative effects of all forms of closures that are impacting motorized recreationists. We recently visited a site in the Flint Creek Range that we have been visiting for years. In the past there has only been 1 other group camping in this area. This past weekend there were over 15 groups (over 100 motorized recreationists) camping in the area and most of them were from Missoula (70 miles one-way). When we asked some of them why they chose this area they responded that they did not have any where else to go in the immediate Missoula area and that the word was out on this particular area. This is happening in too many places and in the end the current closure trend will concentrate everyone in a few locations. We believe, that in the end, the current motorized closure trend will produce an undesirable experience for the forest visitor and for the environment. We respectfully submit that the current management trend of motorized closures at every opportunity is not in the best interest of the public and the environment in the long-term.

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*Page 43 of 152*

NGO-CTVA	Comments	Responses
NGO-CTVA-83	<p>Issue: The proposed action must not result in a disparity in the quantity of motorized recreational opportunities versus non-motorized recreational. The proposed action also must not result in a disparity in the quality of motorized recreational opportunities in comparison non-motorized recreational opportunities. Equal access laws also apply to motorized recreationists and provide for equal access to both an equal level of opportunities and an equal quality of opportunities. Our laws do not give non-motorized recreationists priority over motorized recreationists. Our laws also set the precedent that public facilities must be reasonably shared with one another.</p>	NGO-CTVA-83: See response to NGO-CTVA-62.
NGO-CTVA-84	<p>Issue: Motorized closures are being enacted incrementally and without adequate disclosure and consideration of the cumulative effects. Travel plans are created or revised every 10 years. If 25 to 50% of the existing motorized recreational opportunities are closed in each successive travel plan (a typical range), then over the course of 3 travel planning cycles or about 30 years in a given area, only 13 to 42% of the original motorized recreational opportunities will remain at the end of the third cycle. This trend is being ignored at all levels including the actions listed in Table 2. The plan for this project area does not recognize and address this trend. The Winnemucca Resource Management Plan should adequately recognize and address this trend. The national planning policy does not recognize and address this trend. Therefore, this cumulative effect is being effectively ignored and that failure to notice will result in the ultimate loss of any meaningful motorized recreational opportunities and the creation of defacto wilderness from large blocks of multiple-use lands. <i>Facts do not cease to exist because they are ignored.</i>--Aldous Huxley. We ask that this significant negative cumulative effect on motorized recreationists be adequately recognized, evaluated and mitigated at all levels starting with this project.</p>	NGO-CTVA-84: see response NGO-CTVA-2.
NGO-CTVA-85	<p>Issue: The project cannot be a success without a clear statement of the owners and the objective for the travel plan project. The owners of the travel plan project must be identified as the end users of the project, i.e. all of the public that relies on the project area for motorized access and recreational opportunities. The objective for the project should be "To meet the needs of the public for a functional network of motorized roads and trails for access and recreation with practical and reasonable consideration of the environment".</p>	NGO-CTVA-85: See response to NGO-CTVA-25.
NGO-CTVA-86	<p>Issue: Current planning projects typically add the number of miles of motorized trails closed to the current miles of non-motorized trails as a measure of the change in non-motorized recreational opportunity. However, current planning projects do not add the miles of roads closed by action to the miles of non-motorized trails. Non-motorized recreationists use roads that are closed and benefit from them because closed roads; are open to use by only non-motorized recreationists, are typically clear and easy to walk and bicycle, are covered with natural vegetation within a relatively short time and are quickly used as trails. When roads are closed to motorized recreationists, then they in reality become a non-motorized recreational resource and they must be disclosed as such.</p>	NGO-CTVA-86: See response to NGO-CTVA-56.
NGO-CTVA-87	<p>Unfortunately this procedure has not been practiced to date and the miles of recreational resources have been understated in favor of non-motorized recreationists. All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. We request</p>	NGO-CTVA-87: Impacts associated with route closures would be addressed in the Transportation and Travel Management Plan.

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*Page 44 of 152*