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"CTVA_Action"
<CTVA_Action@q.co
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12/21/2008 06:50
PM

To
<BRMP_Rev_WYMail@blm.gov>

cc

Subject
Comments for the Buffalo RMP
revisions

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 Buffalo RMP revisions. We enjoy riding our OHVs on primitive trails and roads on all of our public lands. All multiple-use land managed by the BLM provides a significant source of these OHV recreational opportunities.

Please accept the attached comments for the Buffalo RMP revisions project record. Let us know if you need a different file format.

Thank you for considering and addressing our comments.

Sincerely,

Action Committee
Capital Trail Vehicle Association (CTVA)
P.O. Box 5295
Helena, MT 59604-5295
CTVA_Action@q.com

Contacts:
Doug Abelin at (406) 461-4818 dabelin@bresnan.net
Don Gordon at (406) 458-9577 DGordon315@aol.com
Ken Salo at (406) 443-5559 ksalo245@msn.com
(See attached file: CTVA Buffalo RMP Comments 1.pdf)

1023

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)
P.O. Box 5295
Helena, MT 59604-5295

December 22, 2008

BFO RMP Revision Project Manager
BLM Buffalo Field Office
1425 Fort Street
Buffalo, Wyoming 82834.
BRMP_Rev_WYMail@blm.gov

Re: Comments for the Buffalo Field Office Resource Management Plan Revision

Dear Sir/Madam,

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 Buffalo Field Office Resource Management Plan Revision project. We enjoy riding our OHVs on primitive trails and roads in the Buffalo area. 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 be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized

1023

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.

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.

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 Buffalo Field Office Resource Management Plan Revision project. 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.

The project area with its current level of motorized access and recreation is where hundreds of thousands of residents from the surrounding regions including Montana and South Dakota 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.

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 the multiple-use management directives specified by congress. The agency can no longer ignore

1023

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[1]. We are ready and committed to working with the Buffalo Field Office to preserve and enhance motorized trails for all recreationists through responsible environmental protection. We respectfully ask that the selected action for the Buffalo Field Office Resource Management Plan Revision be structured to produce this end result by addressing and implementing the comments provided.

We request that the Buffalo Field Office 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 Buffalo Field Office project 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 reasonably meet the requirements of integration a reasonable management goal for 99% of

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

1023

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.

If the Buffalo Field Office Resource Management Plan Revision avoids the evaluation of cumulative effects, then motorized recreation will ultimately be removed from the forest. 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.

If the Buffalo Field Office Resource Management Plan Revision avoids the evaluation of a pro-recreation alternative, then motorized recreationists 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 Buffalo Field Office project area.

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/ Ken Salo for

Action Committee
Capital Trail Vehicle Association (CTVA)[2]
P.O. Box 5295
Helena, MT 59604-5295

[2] 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), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org)

1023

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1023

Information and Issues That Affect Motorized Recreation

December 21, 2008

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.

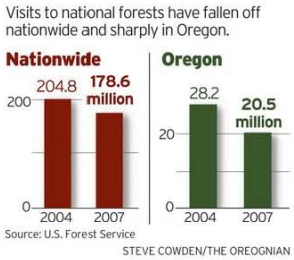
1023

Information and Issues:

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.

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

1. 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://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.



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%

2. 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 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.
3. 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 BLMdevelop 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

1023

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.

4. 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-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.
5. 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.
6. NEPA, CEQ, BLM and Forest Service Handbook (FSH) require consideration of all reasonable alternatives (FSH 1909.15, Chapter 10, Section 12.33 - *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.)* 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:

- The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation.
- The pro-recreation alternative should strive to provide for the current and future demand for OHV recreational routes.
- Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.
- Where appropriate, the agency should use this process to analyze the impacts of any future route construction and include those in the decision.
- Direction for the required process to construct new routes should be incorporated into each alternative.
- At least one alternative should maximize the ability to construct new sustainable trails to meet the current and future need.
- The project team should develop management alternatives that allow for proactive OHV management.
- All alternatives should include specific provisions to mark, map and maintain designated roads, trails and areas in cooperation with OHV users.
- All alternatives should include direction to engage in cooperative management with OHV groups and individuals.

7. 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." Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting City of Tenakee Springs v. Clough, 915 F.2d 1308, 1312 (9th Cir. 1990)). A 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.
8. 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_rey.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.
9. 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.
10. A starting list of actions that should be included in a cumulative effect analysis include:

1023

Table of Cumulative Effects on Motorized Recreationists

Action	Miles before	Miles after	Miles closed	% closed
Sleeping Giant BLM	29	21.6	7.4	26
Elkhorn Management plan			75*	50*
Clancy-Unionville TP	136	108	28	21
North Belts TP	370.4	164.9	205.5	55
South Belts TP	173.6	140.2	34	19
Beaverhead-Deerlodge FP				
Roads			104	
Motorized trails**	1237	1037	200	16
Gallatin NF TP				
4x4 Roads	417	347	70	17
ATV and motorcycle trails***	680	145	535	79
Little Belt, Castle, and Crazy TP				
Roads	1546.7	740.3	806.4	52
ATV trails***	226	208	18	8
Motorcycle trails	658	443	215	33
Rocky Mountain Front TP				
Motorized Trails	209	74	135	65
Badger-Two Medicine TP	**			
Dillon RMP BLM	2102	1342	760	36
Butte RMP BLM	629.3	416.9	212.4	34
Helena area	52.2	9.8	42.5	82
Blackfoot TP	**			
Divide TP	**			
Custer NF TP				
Roads	225	210	15	7
Motorized trails	341	267	74	22
Bitterroot NF TP	**			
Upper Missouri River Breaks RMP	592	404	188	32
Whitetail-Pipestone TP	679	406	273	40
Bruce Creek to Napa Point TP	60	40	20	33
Owyhee Front Travel Plan BLM	834	398	436	48
Salmon Challis NF Travel Plan				
Motorized trails	1110	838	272	25
Tellico OHV area	39.5	24	15.5	39
Moab RMP BLM	6199	3693	2506	40
Monticello RMP BLM	3069	2820	249	8
Richfield RMP BLM	4315	3739	576	13
Grizzly Bear management plan				25*
Big Snowy Mountains TP			100*	50*
Yellowstone NP snow machines****	1400	318	1082	77

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

Page 10 of 148

1023

Action	Miles before	Miles after	Miles closed	% closed
Targhee NF TP				
KIPZ Forest Plan	**			
Lolo Forest Plan	**			
WMPZ Forest Plan	**			
National Forest Cross Country opportunity (acres)	192,300,000 (acres)	0	192,300,000 (acres)	100
BLM Cross Country opportunity (acres)	258,000,000 (acres)	100,000* (acres)	257,900,000 (acres)	99.4%

* estimated
** underway
*** additional impact associated with significant loss of quality trails and substitution with roads
**** number of snow machines

11. 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.
12. Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important.
13. All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.
14. 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.
15. Single-track challenge trails are needed for expert riders and trials type motorcycles.
16. 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.
17. 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.
18. The majority of visitors to the project area are associated with multiple-use opportunities including motorized access and motorized recreation opportunities.
19. These are multiple-use lands as designated by congress and must be managed as such. Recreation is a stated purpose for multiple-use lands.
20. 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.
21. 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.

1023

22. 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 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.
23. The public that enjoys motorized access and recreation is not going to participate in a process where they lose every time.
24. Why are the needs of so many motorized recreationists being largely ignored?
25. 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.
26. 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?
27. 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.
28. Why are the BLM and Forest Service trying to eliminate all meaningful motorized access and OHV recreation?
29. 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?
30. 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.
31. Site specific monitoring of motorized versus non-motorized use must be provided for each route.
32. 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.
33. 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.
34. 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.

1023

35. 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?
36. 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.
37. 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 Buffalo Resource Management area.
38. 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.
39. 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.
40. 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.
41. 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.
42. 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.
43. 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.
44. 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.
45. 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.
46. 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.

47. 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 (http://www.fs.fed.us/trailsunlimited/). 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.
48. 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 http://www.stream.fs.fed.us).
49. The Buffalo Resource Management 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.
50. 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.
51. The mitigation bank debt for motorized route closures should include all of past and reasonably foreseeable closures in the Buffalo Resource Management 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 get consideration of re-opening of closed routes or any new routes to re-establish a reasonable OHV system in that area.
52. 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.
53. 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

1023

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.

EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.

54. Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the adjacent Bighorn 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 Bighorn 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 Bighorn 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 2130 miles and the total miles of exclusive non-motorized trails are 468 (73.82% of all existing) and the cross-country miles are infinite. The total miles of roads open to motorized recreationists are 868 and the total miles of trails open to motorized recreationists is 166 (26.18% of existing) and the miles of cross-country opportunity is zero.

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.

Under the existing condition, 17.51% of the Bighorn National Forest is set-aside for segregated exclusive non-motorized use for 1.02% of the visitors to the forest. The remaining 98.98% 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 82.49% of the forest which is designated by congress as multiple-use would be for shared multiple-use.

The overall allocation of **existing** non-motorized versus motorized access and trail riding opportunities in the Bighorn 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.

1023

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
2	Bighorn	PowderRiver	332,322	Existing	9/7/2006	535	310	217	27	3	0
2	Bighorn	Vhl-Paintrock	364,071	Existing	9/7/2006	446	319	176	67	0	0
2	Bighorn	Tongue	408,624	Existing	9/7/2006	515	239	241	72	1	0
		Totals	0			1,496	868	634	166	4	0
				Miles of Open Road per Square Mile =			0.58				
				Total Roads and Trails Open to Non-Motorized Use, Miles				2,130			
						Non-Motorized Trails, Miles =		468			
						Non-Motorized Trails, % =		73.82%			
							Motorized Trails, miles =		166	4	
							Motorized Trails, % =		26.18%		
								Trails Open to Motorcycles %		0.63%	

http://www.fs.fed.us/recreation/programs/ohv/

http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf

55. In order to bring equality to the allocation of non-motorized to motorized trails in the Bighorn National Forest must either convert 151 miles ((468 – 166)/2) of non-motorized trails to motorized trails or 302 miles (468-166) 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.

56. 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.

57. 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.

EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.

58. At a typical width of no more than 12 feet, the 868 miles of existing roads in the Whitetail-Pipestone project area covers about 1263 acres (868 x 5280 x 12 / 43560). At a typical width of no more than 48 inches, the 162 miles of existing ATV trails cover about 79 acres. At a typical width of no more than 24 inches the 4 miles of existing motorized single-track trails cover about 1 acre. The total area of the Bighorn 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, 0.1139%, 0.0071%, and 0.0001%.

    The total area used by motorized routes under the existing condition is 1342 acres or 0.1211% of a 1,108,000 acre area. Therefore, the area used by existing routes is relatively insignificant

1023

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) =		1,108,000	
	Miles	Feet width	Acres	% of Forest
Miles of road	868.0	12	1262.55	0.1139%
Miles of ATV	162.0	4	78.55	0.0071%
Miles of Motorcycle	4.0	2	0.97	0.0001%
		Total	1342.06	0.1211%

59. In a recent article (http://www.helenair.com/articles/2008/08/01/national/80na_080801_drill.prt) about a lawsuit regarding drilling in New Mexico on the Otera 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.
60. National OHV criteria and standards are not entirely applicable to conditions in the Buffalo 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.
61. 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.
62. Because of the significant impacts on motorized recreationists that are being proposed as part of the Buffalo 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.
63. Specific references from the new National OHV Policy that must be adequately addressed include:

    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.

1023

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 Buffalo 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.

64. 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.
65. 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.
66. 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.

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.

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

1023

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.

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.

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.

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:

1023

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 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.

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

1023

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.

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 Buffalo 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.

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 Buffalo Resource Management Plan Revision. 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:
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). 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% [3]. 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

[3] 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.

1023

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 (www.idahoparks.org/assets/content/docs/2004_usfs_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 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) 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 Wyoming 33.8% participated in OHV recreation or 127,400 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

1023

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) determined that out of the total population in Wyoming 33.8% or 127,400 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 127,400 motorized and OHV recreationists. The current proposal does not 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:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.
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 Bighorn National Forest equals 1,108,000 acres and out of that total 194,000 acres or 17.51% is already designated wilderness. The forest plan for the Bighorn National Forest identifies (inappropriately) that roadless areas, even though they are designated multiple-use lands, will be largely managed as non-motorized. Therefore, this ratio could be even more lopsided toward non-motorized opportunities at 73.56% assuming that defacto wilderness areas including 621,000 acres of roadless areas are largely managed for non-motorized recreation. We maintain that the management of all of the remaining 914,000 congressionally designated multiple-use acres (including roadless) or 82.49% of the forest

should be for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 98.98% of the public who visit the Bighorn National Forest 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 must not meet the basic needs of the public for multiple-use opportunities, a proper allocation of multiple-use recreation opportunities and the laws requiring multiple-use management of these lands.

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.

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.

Issue:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.
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

1023

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.

Issue:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.
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.

Issue:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.
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.

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.

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 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	194,015,494			385,634	**286,445**	124,941	31,853	15,526	65,887,245
			Miles of Open Road per Square Mile =				0.74				
			Total Roads and Trails Open to Non-Motorized Use, Miles					**510,575**			
						Non-Motorized Trails, Miles =		**93,088**			
						Non-Motorized Trails, % =		**74.51%**			
							Motorized Trails, miles =		**31,853**	**15,526**	
							Motorized Trails, % =		**25.49%**		
								Trails Open to Motorcycles %		**12.43%**	
		http://www.fs.fed.us/recreation/programs/ohv/									
	http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf										

Issue:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.

1023

The evaluation must adequately consider and address the fact that motorized access to the national forest in Region 2 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 2 is 47,069 miles, the total miles of exclusive non-motorized trails are 11,057 or 78.05% 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 26,456 and the total miles of trails open to motorized recreationists are 3,109 or 21.95% 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 2 is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.

1023

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
2	Arapaho-Roos/Pawnee	Sulphur	406,728	System	9/7/2006	639	472	346	56	13	0
2	Arapaho-Roos/Pawnee	Pawnee	193,060	System	12/7/2006	440	438	3	0	0	0
2	Arapaho-Roos/Pawnee	CanyonLakes	649,999	System	12/8/2006	776	600	320	22	15	0
2	Arapaho-Roos/Pawnee	Boulder	162,178	Existing	12/9/2006	438	336	184	11	11	0
2	Arapaho-Roos/Pawnee	ClearCreek	172,231	Existing	12/9/2006	297	222	142	0	0	0
2	Pike-SanIsabel/CC	Leadville	279,438	Existing	7/8/2006	215	186	279	8	0	0
2	Pike-SanIsabel/CC	Salida	443,306	Existing	11/8/2006	435	391	284	85	74	0
2	Pike-SanIsabel/CC	SanCarlos	382,904	Existing	10/8/2006	288	279	430	169	61	0
2	Pike-SanIsabel/CC	Comanche	443,081	Existing	8/7/2006	1,047	1,045	78	0	0	0
2	Pike-SanIsabel/CC	Cimarron	108,175	Existing	8/7/2006	371	369	66	0	0	0
2	Pike-SanIsabel/CC	PikesPeak	230,080	Existing	5/9/2006	450	441	214	83	78	0
2	Pike-SanIsabel/CC	S.Park	456,678	Existing	7/9/2006	731	661	242	31	8	0
2	Pike-SanIsabel/CC	S.Platte	408,327	Existing	11/7/2006	304	274	335	107	30	0
2	WhiteRiver	All	2,286,515	Existing	6/7/2006	2,248	1,918	2,462	206	66	0
2	GrandMesa	All	346,555	System	9/6/2006	357	315	252	152	4	0
2	Uncompahgre	All	960,125	System	12/6/2006	1,289	1,074	897	262	111	0
2	Gunnison	All	1,670,796	Existing	7/8/2006	2,272	2,006	1,129	421	344	0
2	SanJuan	Dolores	674,417	Open	9/9/2006	1,240	915	456	338	245	396,782
2	SanJuan	Pagosa	653,342	Open	9/9/2006	733	441	542	100	70	29,051
2	SanJuan	Columbine	779,795	Open	9/9/2006	738	394	536	74	54	153,818
2	RioGrande	ConPk	353,733	Existing	9/7/2006	519	411	337	77	0	0
2	RioGrande	Divide	937,962	Existing	9/8/2006	1,206	523	722	259	0	0
2	RioGrande	Saguache	535,029	Existing	9/9/2006	924	776	293	48	0	0
2	Routt	Yampa	367,072	System	9/7/2006	420	195	287	26	0	0
2	MedicineBow	rushCk-Hayden	537,821	Existing	9/8/2006	1,463	1,126	216	35	0	0
2	Routt	sPk-BearsEars	477,706	System	9/7/2006	530	365	355	105	22	0
2	Routt	Parks	409,371	System	9/7/2006	640	437	343	135	94	0
2	MedicineBow	Laramie	366,112	Existing	9/8/2006	954	786	142	0	0	0
2	MedicineBow	Douglas	180,456	Existing	9/8/2006	339	338	65	20	0	0
2	ThunderBasin		553,257			1,504	1,504	21	21	21	0
2	Shoshone	ClarksFork	495,859	System	4/7/2006	210	174	272	0	0	0
2	Shoshone	Greybull	307,906	System	4/7/2006	181	146	224	0	0	0
2	Shoshone	Washakie	315,010	System	4/7/2006	217	207	184	34	34	0
2	Shoshone	Wapiti	774,103	System	4/7/2006	113	108	151	0	0	0
2	Shoshone	WindRiver	544,108	System	4/7/2006	350	295	264	0	0	0
2	Bighorn	PowderRiver	332,322	Existing	9/7/2006	535	310	217	27	3	0
2	Bighorn	dWhl-Paintrock	364,071	Existing	9/7/2006	446	319	176	67	0	0
2	Bighorn	Tongue	408,624	Existing	9/7/2006	515	239	241	72	1	0
2	BlackHills	All	1,247,991	Open	9/9/2006	5,508	4,401	346	14	0	896,708
2	Neb&McKelvie	Bessey	207,000	Open	9/9/2006	186	186	13	10	0	32,130
2	Neb/Oglala	PineRidge	145,564	Open	9/9/2006	432	430	89	31	0	18,549
2	BuffaloGap	FallR.&Wall	595,000	Open	9/9/2006	347	347	11	11	0	77,221
2	FortPierre	FortPierre	116,000	Open	9/9/2006	56	56	0	0	0	116,000
		Totals	22,269,807			32,903	26,456	14,166	3,109	1,359	1,720,259
				Miles of Open Road per Square Mile =			0.80				
				Total Roads and Trails Open to Non-Motorized Use, Miles				47,069			
						Non-Motorized Trails, Miles =		11,057			
						Non-Motorized Trails, % =		78.05%			
							Motorized Trails, miles =		3,109	1,359	
							Motorized Trails, % =		21.95%		
								Trails Open to Motorcycles %		9.59%	

http://www.fs.fed.us/recreation/programs/ohv/

http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf

Issue:

EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.

Additionally, specific NVUM data for the Bighorn National Forest shows that there were 983,000 total site visits to the forest and only 10,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore, wilderness visits in the Bighorn National Forest are only 1.02% of the total visits yet past decisions by the Bighorn National Forest and other Region 2 forests have produced both a disproportionately large and an

1023

increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 98.98% 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:
EXAMPLE ANALYSIS. NEED TO DEVELOP SIMILAR ONE FOR BUFFALO RESOURCE MANAGEMENT AREA.
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 19.4 acres per wilderness visitor and 0.94 acres per multiple-use visitor for a ratio of about 21:1.

This proposed action, including the conversion of roadless to non-motorized, makes this inequity even worse by providing 81.5 acres per wilderness visitor and 0.30 acre per multiple-use visitor for a ratio of about 271:1.

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

1023

Total Annual Forest Visitors =	983,000
Wilderness Visitors =	10,000
Multiple-use Visitors =	973,000
Forest Acreage =	1,108,000
Existing Wilderness Acreage =	194,000
Existing Multiple-use Acreage =	914,000
Proposed Defacto Wilderness Acreage =	621,000
Total Proposed Defacto Wilderness =	815,000
Total Proposed Multiple-use Acreage =	293,000
Existing Acres/Wilderness Visitor =	**19.40**
Proposed Acres/Wilderness Visitor =	**81.50**
Percent Increase =	**320%**
Existing Acres/Multiple-use Visitor =	**0.94**
Proposed Acres/Multiple-use Visitor =	**0.30**
Percent Decrease =	**-68%**
Existing Ratio of Defacto Wilderness to MU Acres per Visitor	**20.65**
Proposed Ratio of Defacto Wilderness to MU Acres per Visitor	**270.65**
Note 1: Total Proposed Defacto Wildernss 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.	

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.

Congress has designated _____% (need BLM to provide data) of the Buffalo Resource area as wilderness and designated the remaining _____% (need BLM to provide data) for multiple-uses. The Buffalo Resource Management Plan Revision 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.

1023

Issue:
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

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS 22-Dec-07

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	
Column Total	6,108	4,816	481	325	161	69	170		289	
Total Observations on Multiple-Use Lands								12,130		
Mechanized Total				11,730	Non-mech Total		400			
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

Our observations of recreationists on multiple-use public lands from 1999 through 2007 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 12,130 observations, 11,730 recreationists or 97% of the visitors were associated with motorized access and multiple-uses. Additionally, of the total number of people visiting public lands, 40% (4,816 / 12,130) were associated with OHV recreation. **Furthermore, and most importantly, out of the 5,541 (4,816+325+161+69+170) visitors that we observed <u>using trails</u>, 4,816 or 87% were OHV recreationists and 725 or 13% were non-motorized recreationists which includes mountain bikes (8:1 motorized 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, 87% of the trail users are motorized and 93% when including mountain bikes and consequently, 87 to 97% of the trails system and public land should be managed for multiple-uses including motorized access and recreation.**

However, 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. The Final Roadless Rule published on January 5, 2001

1023

(http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) specifically stated "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. 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).

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:
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.

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 Bureau of Land Management 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:
Out of the 12,130 recreationists that were observed, 170 were hikers and all of the meetings were pleasant. We have not experienced any user conflict in eight years of observations.

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:
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.

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.

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.

Issue:
A poll conducted by the BlueRibbon Coalition (http://www.sharetrails.org/uploads/PL/GMUG/GMUG_Survey_Key_Findings.pdf) 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."

1023

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, 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:
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.

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.

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.

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.

Issue:
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 . 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 shear 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

1023

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.

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).

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.

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.

1023

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.

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.

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.

Issue:
We read the recent KIPZ Forest Plan Revision Newsletter dated July 6, 2006 (http://www.fs.fed.us/kipz/documents/070606_kipznewsletter_issue9_color.pdf)and we are very concerned about the misleading statement made in the newsletter. Under the 4th bulleted item on page 1, the statement is made *Therefore, the Proposed Plan will not open or close roads or trails; it only identifies the desired motorized/non-motorized condition.* 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 justices impacts to motorized recreationists associated with this setting that must be addressed by this action.

Issue:
The new Forest Service rule for forest planning has determined *The environmental review has documented that writing management plans has no effect on the environment, which qualifies the individual plans of each National Forest for categorical exclusion from individual study under the National Environmental Policy Act. ….Under the 2005 planning rule, full environmental analysis will continue at the project level where public involvement and the best available science can inform on the ground decision-making.* (http://www.fs.fed.us/news/2006/releases/12/ce-statement.shtml) The basis for this guidance is that from here forward forest plans will not produce any significant changes from the existing condition and if a proposed future action does produce significant impact it must include specific analysis and public input developed as part of that project. Additionally, any guidance found in the forest plan must yield to the site specific project

analysis. Therefore, the role of the forest plan has been greatly diminished and guidance from the forest plan must not be cited as reasons for justifying a proposed course of action, i.e., convert an area or route from motorized to non-motorized. This direction is to come from the analysis of a specific proposed action (http://www.helenair.com/articles/2007/01/01/montana/ao510101_2.prt). Therefore, the use of "consistency with the forest plan" is no longer a valid reason to close motorized recreational resources and only site specific data and reasons should be used to address motorized recreation needs and resources. We support this rule because otherwise motorized recreationists would be subject to double jeopardy, i.e., must defend motorized routes in first the forest plan action and then the travel plan action.

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.

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 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 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.
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).

1023

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 Buffalo 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/ci_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:
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.

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.

Issue:

1023

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.

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.

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.

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 Buffalo Resource Management

1023

Plan Revision does not 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. *Facts do not cease to exist because they are ignored.*--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.

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".

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.

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 that this procedure be used by this project and all future agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated.

Issue:
The unstated but obvious goal or policy of the agency is to close as many recreational resources to motorized recreationists as possible. The trend to date of overall recreational opportunities (sum total) for motorized recreationists is a large negative amount. This cumulative effect is forcing motorized recreationists into a smaller and smaller resource base. The ultimate outcome of this unstated goal or policy will result in unreasonable impacts to both the natural and human environments. It is also an unreasonable policy or goal with respect to fair and equal treatment of motorized recreationists.

Environmental impacts are not unreasonable under the current conditions but environmental impacts will become unreasonable given the agency's current direction to close as many motorized recreational opportunities as possible and that divide will be crossed soon. Therefore, agency management actions are ultimately creating significant unnecessary negative impacts on both the

1023

natural and human environment. We are concerned that this unstated goal or policy is not in the best interest of protecting the natural or human environment and ask that goals and policies by modified to allow the public continued use of all reasonable access and recreational opportunities on all multiple-use lands.

Issue:
Agency planning including travel management projects should be a process to quantify and address the needs of the public for motorized access and motorized recreational opportunities. Instead, it is approached in just the opposite direction as a closure process that ignores the needs of the public for motorized access and motorized recreational opportunities. Every travel planning process listed in Table 2 has reduced motorized access and motorized recreation. A travel planning process has never resulted in increased recreational opportunities for motorized recreationists. The travel management process as currently practiced is not equitable because: (1) it does not adequately address the needs of the public for multiple-use recreational opportunities including motorized access and motorized recreation, and (2) it is deceptive to represent the process as a travel management process that will address the needs of the public when it is really just the opposite, i.e., a closure process that does not fairly and adequately address the needs of the public. We request that the process either be renamed to "Travel Closure Process" in order to end the deception of the public **OR** (as we strongly prefer) that the process be redirected 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.

Issue:
Idaho's Trail Ranger program combined with cooperative management of National Forest lands provide over 9,000 miles of trail riding opportunities (http://www.idahoparks.org/rec/ranger1.html). This is provided as an example of the level of OHV programs and recreational opportunities that motorized recreationists need in each state and we ask that this project adopt a similar goal.

Issue:
The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized access and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of a significant predisposition in the process.

Issue:
The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands must be adequately evaluated and considered in the decision-making. This is especially significant now that fuel is over $2.00 per gallon. These impacts include the complete loss of recreational opportunities and the cost of having to travel farther and farther in search of fewer and fewer motorized recreational opportunities in times of increasing travel costs. For example, the lack of adequate OHV systems in the Helena National Forest requires us to travel at least 180 miles to adjacent national forests and many more miles to other states including Idaho and Utah. A 180 mile roundtrip costs at least 3 hours and $70 and that cost will increase substantially in the future. This added cost is a waste of time and energy resources and has not been adequately considered by the agency.

1023

Additionally, OHV routes in adjacent forests are being reduced at an alarming rate and are compounding the cost in time and energy even further. We request the evaluation of the economic cost of fewer motorized recreation opportunities on motorized recreationists and the significant cumulative negative effect of all travel management decisions that contribute to these social and economic impacts on motorized recreationists.

Issue:
The different management plans being developed by the BLM and Forest Service are using generated, estimated and inadequate data to forward an agenda of eliminating access and motorized recreation from public lands. The economic impact of these closures will be devastating to small communities throughout the West. Models can be manipulated to predict any result. Economic models such as Implan should not be used when the input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.

Issue:
While we respect other perspectives, one must also realize that the extreme ideals of the environmental groups such as the public should not be able to enjoy and use public lands, that everything should be wild, and that their use is the only reasonable use are not generally acceptable ideals for public policy nor are they supported by the laws. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment and we believe that the laws are intended to support this ideal. Our position is to restore balance, practicality and fairness to the system.

Issue:
The existing level of access and motorized recreation is a reasonable starting position and alternative. An even fairer position given that this should be a travel plan seeking to address the needs of the public for motorized access and recreation would be an alternative based on an enhanced level of opportunity. However, a starting position of massive closures is completely unreasonable and tells us a lot about where the process is heading. It seems to be predisposed. This strategy is outrageous because it forces the public to fight to get every inch of motorized road and trail added back into the preferred alternative. This strategy is designed so that motorized recreationists are destined from the outset to lose big time. The damage has been done as we hear many people saying "what's the point of participating, the process is rigged and the Bureau of Land Management has already made up its mind". We request that this strategy be corrected by presenting a starting alternative that addresses the need for multiple-use access and recreational opportunities.

Issue:
The planning team should formulate an Alternative that maximizes all existing recreational opportunities, as well as anticipates and plans for an increase in recreational use in the future. None of the Draft Alternatives maximize recreational alternatives and most of them fail to provide adequate recreational opportunity to meet the current need.

Issue:

1023

The agency must develop a true No Action alternative in compliance with NEPA and other planning regulations. The agency must formulate a lawful "No Action" alternative so that the public and decision makers may reasonable compare and contrast other management alternatives.

A No Action alternative is a vital component in assuring full public disclosure of all foreseeable direct, indirect, and cumulative environmental impacts of the project, and consistency with environmental and public involvement requirements of State and Federal laws, Executive Orders and policies. The twin goals of NEPA (to inform the public and disclose anticipated effects) are not met without a properly written and accurate No Action alternative.

An accurate No Action alternative provides for a clear, logical and comprehensive analysis process and disclosure of effects, both to the human environment and especially in this case, effects to visitors. An accurate No Action alternative is the prescribed way the agency discloses existing conditions of Federal lands and serves as a baseline for discussion of guidance and rationale for proposed changes to travel management direction and programs for implementation. Under the existing conditions motorized recreationists have a reasonable number of choices and variation of opportunities. Under most proposed conditions, motorized recreationists have a significantly reduced number and variety of opportunities. We do not want to be forced to go to the same place over and over nor do we want to be squeezed out from public lands. Therefore, the No Action (existing condition) alternative must be accurately and reasonably evaluated.

Issue:
There is an increasing demand for OHV recreation opportunities on public lands. The BLM, Forest Service, as well as environmental groups, state and local governments and OHV and recreational access organizations have all acknowledged that many Land Use Plans woefully failed to anticipate the increased public demand for all types of outdoor recreation and related OHV uses. Additionally, and importantly, the Bureau of Land Management's National OHV Strategy states: "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. … Some of [the factors contributing to growing OHV popularity] are:

- greater public interest in unconfined outdoor recreational opportunities;
- rising disposable income …
- advances in vehicle technology
- the rapid growth of the West's cities and suburbs …
- a population with an increasing median age with changing outdoor recreational interests.

This [growing OHV] popularity is evidenced by the fact that recreational enthusiasts are buying OHV's at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers." "[BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives.' As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. … Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands".

1023

Unwisely, rather than work to accommodate the increased demand for OHV recreation, BLM and many National Forests have frequently reacted by restricting OHV opportunities. But more importantly, opportunities to manage OHV use by developing OHV trail systems, marking roads and trails, providing usable maps, identifying OHV trails and systems and entering into cooperative management agreements with OHV user groups have, by and large, been ignored by most federal land managers. Although more pro-active management is clearly permissible within the existing management plans, a quick search on the BLM's and National Forest's websites indicates that land managers more often choose to implement parts of their OHV policy associated with limitations and closures.

Suggestions:
a) The agency cannot legitimately address increasing demand for OHV recreation opportunity by refusing to accommodate such demand. Alternatives must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand.
b) The planning team should look to individuals and user groups for assistance in identifying opportunities for OHV recreation.
c) The planning team should develop management alternatives that allow for proactive OHV management. All alternatives should include specific provisions to mark, map and maintain existing OHV opportunities. All alternatives should include instructions to engage in cooperative management with OHV groups and individuals.
d) Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.

Issue:
When developing management alternatives the agency must recognize the public's desire to keep existing opportunities open.

OHV's are by far the most desired and utilized means to obtain solitude in nature. Most public land visitors strongly favor maintaining exiting roads and trails open to disperse use and address environmental concerns regardless whether or not the road or trail is classified by the agency. The agency must recognize that providing for OHV use and protecting the environment means fully utilizing the inventory of existing roads and trails.

Suggestions:
a) The public wants the existing roads and trails left open to vehicle use.
b) The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems.
c) The Planning Team should look for management alternatives that provide for mitigation instead of closure. Options other than closure should be emphasized in each alternative.
d) Alternatives, or management guidance, directives etc that require closure as the first or only option when resource impacts are identified should be avoided.
e) The Planning Team should carefully consider displaced use. Assuming that closures are eminent in some areas, one could calculate approximately how much existing motorized will be displaced to other areas. The Planning Team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use.
f) The Planning Team should avoid overly restrictive management prescriptions that limit the land manager's ability to respond to changing recreational patterns.

1023

Issue:
Agency managers seem to be directed to close as much public land as possible to motorized visitors by a top down management directive that is conflicting with the needs of the public for multiple-use access and recreational opportunities and contrary to the laws established by congress. Congress has not designated this area to be wilderness and existing congressional laws clearly intend for this area to be managed for multiple-uses. Why are legally designated multiple-use lands being managed for limited-use instead of multiple-use? The top down closure directive is in violation of the will of the people and in violation of congressional laws.

Issue:
Because of the excessive closures proposed, motorized recreationists are forced once again into a confrontational position with the agency in order preserve any sort of reasonable solution. This is not our choice and we are disadvantaged by being placed in this position. We would prefer to work collaboratively with the agency but once again the travel planning process is being approached as a "closure" process. We are concerned that this is a conscious strategy to put motorized recreationists, who are largely unorganized, at a disadvantage. We ask that this concern be adequately addressed and that significant changes be made to the procedures in order to eliminate this disadvantage.

Issue:
All of the existing motorized routes are very important resources to us. For example, we have enjoyed trips to project area and these have usually been extended weekend trips that are special events for us. We have ridden over most of the open routes in the project area and have thoroughly enjoyed them but we could not accurately draw lines on a map to describe where we have been and what routes we want to remain open. We are puzzled by this requirement. We have never had to identify and inventory backpacking routes that we wish to remain open. Additionally, most motorized recreationists do not have the expertise or equipment required to provide a comprehensive inventory of roads and trails. We are very concerned about the burden and disadvantage that is placed on motorized recreationists by this procedure and we request that it be changed.

Issue:
We are very concerned that motorized recreationists must identify and inventory specific routes that we want to remain open. These resources are there now and they are being used by the public and in almost all cases, it is entirely reasonable type and level of use. Motorized recreationists should not have to identify and inventory motorized routes as part of the process. This is the work of the agency. No other visitor group is saddled with this requirement. Our concern is that the agency is using public involvement in a discriminatory way to establish which motorized routes will remain open. For example, the Bureau of Land Management has concluded that the level of use by motorcycles is low based on the level of public participation in the environmental process. There is no actual data or comparison of motorcycle use to hiking use or direct discussion with motorized recreationists to substantiate this.

Issue:
We respectfully maintain that the agency can not establish the motorized routes to remain open based solely on formal written public input because the process did not have a high enough level of participation by motorized recreationists to develop meaningful input. Therefore, the needs of

motorized recreationists are not adequately or accurately represented. Our comments submitted during the EA further explain why this condition exists but basically the process, as practiced, is overwhelming and intimidating to the public. There are ways to more directly involve motorized recreationists including interviews at club meetings and interviews on the trails and at trailheads. Continuing to use the practice of formal written comments to establish the need for motorized routes will leave motorized recreationists with only a few main roads and with no high quality motorized trails. We object to this process and respectfully request that it be corrected. Additionally, the current practice is discriminatory because non-motorized recreationists are not required to submit written formal comments that identify and defend each and every recreational opportunity that they want to enjoy in the future. Again, we respectfully ask that this practice be corrected.

Issue:
Similar to non-motorized recreationists, motorized recreationists also like plenty of dispersed recreational opportunities and the current trend is limiting motorized recreationists to a very few locations. Additionally, eliminating dispersed motorized recreational opportunities and concentrating the few remaining motorized recreational opportunities in relatively small areas significantly increases negative impacts on both the natural and human environments to the point that the impacts become unacceptable and this trend is neither reasonable nor equitable. The following are some typical comments found on the different OHV forums: *This area gets a lot of traffic. I wouldn't dare go on a weekend, it's almost like Hollister with the crowds. Just too small of an area for the amount of riders.*

Issue:
Requiring motorized visitors to identify and inventory roads and trails is seen as part of a strategy to reduce the number of motorized routes because the public cannot undertake this huge effort. Additionally, the national OHV decision required that site-specific planning be analyzed at a number of different scales and across different boundaries. Site specific planning includes an adequate evaluation by the agency of all of the impacts being experienced by motorized recreationists including motorcycle trail riders in both the project area and the surrounding region. The scale and boundaries of impacts being experienced by motorized recreationists are discussed in throughout these comments. Site specific analysis was an important part of the national OHV decision and was discussed many times in that document. The agency should commit the resources and has an obligation to evaluate the needs of OHV recreationists at a least the same level of detail as key wildlife and natural resource areas. Site specific analysis includes adequate identification and inventory of all existing motorized routes and adequate evaluation of the public's need for those routes. An example of adequate site specific analysis to be used as a guideline are the comments dated May 1, 2004 and prepared by John Borg for the Caribou Travel Plan Revision. A copy of these comments can be obtained from the project record for the Caribou Travel Plan Revision or at www.mtvra.com.

Issue:
The new National OHV Policy describe the second level of planning involving the analysis and implementation of management practices referred to as "site-specific" planning. Site specific planning detailed information including the location, condition, and current uses of individual roads and trails, and the identification of when and where individual roads and trails will be open or closed to various types of use. We supported the restriction of cross-country travel because we felt

1023

the document assured the identification of on the ground trails and their consideration as designated routes. Currently in Montana, the only forest to conduct an inventory that includes adequate detail and includes trails that are current routes on the ground is the Lewis and Clark National Forest in the Little Belt Range. Adequate site specific planning as outlined above must be provided as part of this project.

Issue:
A reasonable test of significance of impacts from motorized closures on motorized recreationists must be used. A reasonable test would include evaluation of indicators including:

1. Where else can motorized recreationists go within a reasonable distance and with equal recreation value?
2. Do motorized recreationists have an adequate selection of the recreational resources with the proposed motorized closure(s)?
3. What is the balance of recreational opportunities in the area and region as demonstrated by the information developed from the outline shown in Table 3?
4. Are the existing motorized recreational opportunities sufficient for the needs of the public?
5. Are there documented user conflict and can the recreational resources be reasonably shared? Note that it is not reasonable to define user conflict a merely seeing someone else on a trail.
6. What are the cumulative effects of this motorized closure combined with all other motorized closures?

Issue:
In order to adequately evaluate and disclose motorized and non-motorized recreational resource and opportunity information to the public, the following information using tables and maps must be used and presented in an accurate and concise manner.

Table 3
Comparison of Non-motorized and Motorized Opportunities

1. the miles of non-motorized recreational opportunities available in the project area including all possible cross-country routes and the number of acres available for cross-country non-motorized recreation under the existing condition (it is infinite),
2. the miles of roads and trails and number of acres to be closed to non-motorized recreationists in the proposed condition,
3. the miles of existing motorized roads, atv trails, and motorcycle trails in the project area meeting the 3-States OHV decision definitions,
4. the acres within the project area open to motorized recreationists under existing and proposed conditions,
5. the percent of motorized and non-motorized recreational opportunities in the project area,
6. the miles of atv trails, motorcycle trails and roads and acres closed to motorized recreationists under both existing and proposed conditions,
7. the cumulative miles of roads, atv trails, motorcycle trails meeting the 3-State OHV definitions and number of acres closed to motorized recreationists over the past 35 years at 5 year intervals in both the project area and regional area.

Once this information is adequately and concisely presented, one can easily see that motorized recreational opportunities are limited in the existing condition and then severely reduced in the

1023

proposed condition. This information must be presented in order to understand the significant imbalance of recreational opportunities that exists and the decision is deficient without this information.

Issue:
The evaluation of a balance of opportunities should also include an accounting and comparison of facilities including trailhead facilities at wilderness areas versus trailhead facilities at OHV areas. Most wilderness trailhead facilities include parking lots, horse handling facilities, kiosks with information, campgrounds, and restrooms and they are funded without any direct connection to the users. Motorized recreationists generate more than adequate gas tax and OHV sticker revenues (over $500,000 in FY 2003 in Montana, FWP OHV program and RTP) but have few facilities to show for it versus a great need for facilities. Additionally, another $311,274 that was designated for motorized programs and that could have been spent on badly needed motorized recreational facilities were instead spent on non-motorized facilities. We request an adequate evaluation and consideration of these imbalances be made part of this project and actions taken that will correct these imbalances.

Issue:
The reason often given by the agency that motorized trail projects including those using OHV grant money cannot be undertaken is that there is a current travel planning process under way or one about to begin or that NEPA compliance must be undertaken. There is a continuous cycle of travel planning undertaken and the public is not able to undertake NEPA compliance. The result is that motorized RTP funding is often under-utilized. At the same time, there is a tremendous need to projects on motorized routes. We need to find a way to break this Catch-22 situation.

Issue:
Because of the cumulative negative effects of the motorized closure trend, the resource base for motorized recreationists is generally be 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 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. It is not fair that motorized recreationists practice "tread lightly" principles and are then penalized for that practice. This is another example of predisposition.

Issue:
Throughout this document we may refer to motorcycle trail riders and atv riders as motorized recreationists because the relationship between them are inter-twined. For example, many trails that were once single-track have become atv trails. Additionally, the trend of motorized trail closures affects all OHV recreationists and puts additional demands on the few motorized recreational opportunities that remain. However, motorized single-track trails are a uniquely different resource and experience compared to atv trails and must be recognized as such.

Issue:
Existing single-track trails or potential single-track trails were not adequately identified and included in the project. There are many single-track "cow" trails that motorcycle trail riders could use in the project area. It is critical to preserve the integrity of the existing motorized single-track

1023

trails. Single-track trails offer a highly desirable experience for trail bike riders, equestrians, hikers, and bicyclists. They offer a different, more primitive experience than ATV trails or forest roads.

Issue:
Motorcycle trail riders were the original motorized trail users and have a long history of trail maintenance and trail etiquette. 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. Therefore, it is a reasonable alternative to designate all single-track trails on multiple-use lands open to motorcycle use. The South Fork of the Boise River in the Sawtooth National Forest is specifically referenced as the best example of an excellent multiple-use single-track trail system that is open to mountain bikes, equestrians, hikers, and motorcyclists. It is also an excellent example of a reasonable travel plan process (http://www.fs.fed.us/r4/sawtooth/projects/). We commend the Sawtooth National Forest for providing such a valuable recreation resource and for taking such a reasonable approach to travel planning that both perpetuates existing motorized access and recreational opportunities and also provides for enhancement and growth. The project team is encouraged to visit and observe the use of this area and to follow a similar travel plan process.

There is no significant impact from the level of dispersed motorcycle trail use in the project area. There is no legitimate or documented conflict of uses between motorcyclists and other uses on single-track trails in the project area. Note that it is not reasonable to define user conflict a merely seeing someone else on a trail. There is a significant need for an adequate number of miles of single-track for existing and future motorcyclists. There is no legitimate reason why the single-track trails in the multiple-use areas of the project should not be shared between motorized and non-motorized recreationists to a much greater extent. This reasonable alternative must be included.

Issue:
Motorcyclists have co-existed for years with other recreationists in the project area. There is no documentation of a wide-spread problem with this multiple-use. We do not believe that it is reasonable to suddenly consider this multiple-use a problem.

Issue:
Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail. Additionally, motorcyclists have been keep single-track trails that mountain bikers have recently discovered, open for many years.

Issue:
As part of the planning process, the agency is requiring motorized recreationists to provide an inventory of motorized routes that are important to them. It is not reasonable to expect motorized recreationists to inventory all existing motorized access and motorized recreational opportunities that they would like to use over the course of a lifetime. For example, motorized recreationists may be planning to visit an area that is 200 miles away for a week long summer vacation to enjoy motorized routes or we know people from several hundred miles away that routinely hunt in the fall and use many of the primitive roads and trails within the project area. They are not aware of the planning process and, even if they did, would not be able to inventory all of the primitive roads that they use. They simply expect the agency to look after their needs and that these motorized access and recreational resources will always be there for them. They will be extremely disappointed when

they go out to their favorite hunting camp and find 50% of the access closed. This is also an example of why the results of travel planning are generally poorly supported by the public.

Under the current process if motorized recreationists are not involved in the planning process for that area they will undoubtedly lose use of one-half of the existing routes and be extremely disappointed when they do visit in the future. Given the significant number of actions as demonstrated in Table 2, it is impossible for motorized recreationists to participate in each action and provide inventories of routes for each action, so motorized recreationists are destined to lose because the agency will not adequately consider our needs unless we provide inventories of routes. Again, a significant predisposition exists because the needs of non-motorized recreationists are given significant consideration without the requirement for inventories and identification of resources, i.e. non-motorized recreationists are not subjected to the same requirement to identify trails now in order to keep them open for future use and generations.

Issue:
The amount of use that a route receives is not a criterion for non-motorized routes (see later comment about solitude on CDNST) and should not be a requirement for motorized routes. Solitude, challenging, and remote motorized routes are highly valued by motorized recreationists also.

Issue:
The document and decision must clearly disclose on maps and tables and summaries all existing areas, and existing roads and trails that would be closed to motorized access and motorized recreationists. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided and the public will not be informed and the public including motorized recreationists will not be able to adequately participate and comment.

Issue:
The document and decision makers must prove by use of facts and data and without reasonable doubt that the claimed improvements to the natural environment are significant enough to justify the significant impact on the human environment associated with the closure of motorized routes. There must be a measurable and significant improvement. Additionally, there must be monitoring to backup the claimed improvements to the natural environment.

Issue:
All of the motorized routes that are important to the public cannot be identified by clubs and individuals. Everyone that visits our public lands has a special road or trail that they like to visit. Getting everyone to participate and identify all of these routes is neither practical nor reasonable. All of the existing routes exist because they are important access and recreational opportunities. Therefore, all existing routes without significant environmental considered as the preferred alternative. Additionally, all available mitigation measures must be adequately considered for those routes with environmental concerns. We strongly support mitigation before motorized closure and, in fairness to the public, encourage the agency to adopt this policy also.

Issue:
Due to the trend of motorized closure after motorized closure, the prevailing question is not will we lose access and recreation opportunities but rather how much will we lose in each action. Motorized

recreationists are the only group to lose in every action on local, regional and national levels, yet the cumulative negative effect of this significant negative impact has never been tabulated or addressed. This obvious predisposition must be adequately addressed. The magnitude of these undisclosed cumulative negative impacts on multiple-use interest including motorized recreationists has increased to the point where the livelihood and recreation of nearly everyone has been significantly impacted yet an adequate assessment has not been conducted nor included in the decision-making. Allowing the cumulative effects of the closure trend to continue over and over without any consideration of impacts or mitigation will certainly allow the cumulative effects to eliminate any meaningful motorized recreation. The burden of establishing the cumulative negative effect of all motorized access and motorized recreational closures should not fall on motorized recreationists. Table 2 is a partial listing of projects that have had a negative impact on motorized recreationists. All of these actions and others must be included in the tabulation and evaluation of cumulative negative effects on motorized recreationists. Most of these projects have not adequately disclosed the true number of miles of roads and trails and recreational opportunities that were in use by the public and then closed to motorized use as part of their implementation. This lack of disclosure is not acceptable and we request that the lack of disclosure be addressed by establishing the true magnitude and cumulative negative effect of all motorized access and motorized recreational closures. When tabulated, this cumulative negative effect must be considered in the evaluation and decision-making for this action. Additionally, adequate mitigation must now be implemented to counter the cumulative negative effects that motorized recreationists have experienced.

Issue:
If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss. It would be the responsibility of a cooperative group of public land management agencies to monitor the balance sheet and work towards no net loss/closure of motorized access and motorized recreation. Similar to other mitigation banks, motorized access and routes closed to motorized use would be replaced with equivalent routes on a one to one basis. Where equivalent routes cannot be found, then mitigation would be provided at 2 to 4 times the length of the closed route. Where equivalent access and/or areas cannot be found, then mitigation would be applied at 2 to 4 times the area closed depending on the quality of the closed route or area.

Issue:
The cumulative negative effects of more restrictive travel plan decisions include the concentration of use on fewer miles of road and trail, such that traffic density is increased and recreation enjoyment is reduced. As shown in Table 2, the magnitude of this impact is significant and yet it is ignored. To experience the cumulative effects of motorized closures first hand one can visit the Whitetail-Pipestone area on Memorial Day and Copper Creek near west of Phillipsburg on July 4th and see hundreds to thousands of multiple-use recreationists forced into small areas with limited opportunities by the cumulative effects of many motorized closures produced by forest plans and travel plans. Travel decisions affecting public lands that restrict motorized recreation in one area may consequently increase motorized use in another where site-specific travel plans are not yet in place. Cumulatively then, this "leapfrog" effect may increase resource damage, create more law enforcement problems, generate discord between motorized and non-motorized recreationists, and

1023

make future site-specific travel planning more difficult. This cumulative negative effect must be adequately considered as part of this project.

Issue:
The list of projects in Table 2 demonstrates that motorized routes are all too commonly closed for exclusive non-motorized use. The proposed action continues this massive trend. The Forest Service looks out for the interests and needs of non-motorized interests and is willing to create many miles of new non-motorized trails as demonstrated by a number of projects such as the CDNST. We request the same cooperation between the Bureau of Land Management and a recreation group be extended to motorized recreationists. We request that the Bureau of Land Management provide the same attention to our needs. Now it is time for a route to be closed for exclusive use by motorcycles. We request that trails be closed for exclusive use by OHVs and that 100 miles of new motorized recreational opportunity be created as a demonstration of equal opportunity.

Issue:
There are a few good examples of OHV trail systems that should be used to guide development of this project. OHV trail systems that should be visited by the project team as good examples of the types of systems that should be developed in the project area include Danskin Mountain in the Boise National Forest (http://www.fs.fed.us/r4/boise/conditions/Danskin_closure-map.pdf), South Fork Boise River in the Boise and Sawtooth National Forests, Winom-Frazier in the Umatilla/Whitman National Forest, Prospect in the Rogue River National Forest, Paiute in the Fishlake National Forest, East Fork Rock (http://www.fs.fed.us/r6/centraloregon/recreation/cohvops/efrindex.shtml) and Mendocino National Forest (http://www.fs.fed.us/r5/mendocino/recreation/ohv/. In order to meet the public's need for motorized recreational opportunities, the project area and every national forest and BLM district should have a number of OHV systems comparable to these examples.

Issue:
The process is predisposed because without adequately considering the needs of the public it immediately proposes to add to the vast opportunities for non-motorized recreationists that are not over-used and further impacts multiple-use visitors, who make up 97.45% of the visitors by further limiting their recreational opportunities. It has now reached the point now where multiple-use recreationists do not have an equal opportunity to enjoy our public lands. Multiple-use recreationists feel like they are being treated as second class citizens. It is bad public policy when that policy affects 97% of the public in a negative way.

Issue:
The prevailing trend of the past 35± years has been to convert large areas of federally managed lands in the project area and region from multiple-use lands to wilderness/non-motorized/exclusive-use lands which is direct contradiction to the number of visitors and their needs. How many "land of many uses" signs do you see anymore? The remaining multiple-use areas are the only areas where most of the public can access and experience our public lands. Therefore, the remaining multiple-use lands must remain open for multiple-use, motorized access and motorized recreation in order to adequately and reasonably meet the needs of 97.45% of the public.

Issue:

1023

The greatest communal need for public lands is for multiple-use opportunities. We promote management for multiple-use because it allows everybody to enjoy the resources and it also promotes sharing and non-polarization of visitors. Other management schemes promote non-sharing and polarization of visitors. We can solve more problems by resisting non-sharing and polarization and working together. Additionally, non-sharing of multiple-use lands is not an acceptable concept and motorized recreationists have never considered non-sharing as a reasonable alternative to pursue.

Issue:
The most equitable management of public lands is for multiple-uses. Congress has recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as "*The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...*". **Outdoor recreation is the first stated purpose of the act**. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.

Public Law 88-657 states that "*the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.*".

The Federal Land Policy and Management Act of 1976 (FLPMA) states that "*(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law;* and, *(c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;*".

The BLM Strategic Plan FY 2000 to 2005 states that: "*To achieve this mission, the Bureau of Land Management follows these principles: Manage natural resources for multiple use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.*"

Multiple-use management goals are the only goals that will "best meet the needs" of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use

1023

lands are public places. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Segregation in public places has not been acceptable since the Civil Rights Act of 1964.

A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. Why are legally designated multiple-use lands being managed for limited-use instead of multiple-use? This is a significant issue and must be adequately addressed. The cumulative negative effects of other proposed and enacted federal land management policies have resulted in a significant reduction of multiple-use and OHV recreation opportunities. The result has been a significant conversion of multiple-use areas to exclusive non-motorized areas. We request compliance with multiple-use policies and laws and a preferred alternative that will support these policies and laws and the needs of the public

Issue:
Beginning in the early 1970's, Congress and the American people began a debate on whether or not to change national policy for vast areas of the west known as "public lands". Congress wanted to change the policy from "disposal" to "retention". This policy shift meant the Federal government would stop holding lands until they were sold (or otherwise transferred to the states), and would retain and manage the lands for the benefit of the general public.

Many citizens and especially those in western states were concerned. Entire communities relied upon access to resources existing on adjacent public lands. Indeed, western custom and culture grew from a tradition of open access and use of public lands. Many felt the "retention" policy would unduly influence the lives and livelihoods of citizens in the west.

In 1976, Congress struck an agreement with the western states. The basic agreement was that the western states would not oppose the retention of these lands if the Federal Government would manage them under multiple use/sustained yield principles, protect valid existing rights, limit wilderness review and consider the needs and concerns of adjacent communities when formulating land use plans. Thus the FLPMA (Federal Land Policy and Management Act) was adopted.

There are 4 important elements within FLPMA:

First, and very important, was the mandate to manage lands under the principles of Multiple Use. The Section 202, subsection (c)(1), specifically requires development and revision of land use plans on the basis of "principles of multiple use and sustained yield." FLPMA section 102(a)(7) also specifically requires that goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law.

Second was the preservation of valid existing rights, including grazing rights, mining claims, oil and gas leases, water rights and rights of access granted pursuant to R.S. 2477. Therefore, the R.S. 2477 law is a very important and germane issue for this project.

The third element was specific instructions to the Secretary of the Interior to formulate land use plans that are consistent with State and local plans "...to the maximum extent he finds consistent with Federal law and the purposes of this Act." This element includes provisions to coordinate land use inventory, planning and management activities not only with other federal agencies, but specifically with agencies of the State and local government.

The fourth element of FLPMA consists of very specific instructions regarding Wilderness. Those instructions are contained in Section 603 of FLPMA, wherein Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality, and then begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National, Wilderness Preservation System. Congress even set a deadline for the completion of this task. A critical part of the agreement was that FLPMA sets no mandates and no process requirements for engaging in an ongoing, never ending wilderness inventory and review. Once the "603 Process" was completed, the agency would be finished with wilderness inventory and review. Congress and the American People would then decide which lands to include in the National Wilderness Preservation System.

We simply ask that all of the instructions and requirements of the law as agreed to under the Federal Land Policy and Management Act be honored and applied to this project.

Issue:
Any language in existing management plans for multiple-use areas that does not support multiple-use is inconsistent with directives from Congress, the needs of the public and should be struck. Any proposed language for the management plans for multiple-use areas that does not fully support multiple-use is inconsistent with directives from Congress, the needs of the public and should be dropped.

Issue:
Under the Organic Act of 1897, 16 U.S.C. § 475, ("Organic Act"), National forests were expressly reserved for two purposes: to maintain favorable conditions for water flows and to ensure a continuous supply of timber. With passage of the Multiple Use and Sustained Yield Act, 16 U.S.C. § 528 et. seq. ("MUSYA"), Congress allowed the Forest Service to manage "renewable surface resources of the national forest for multiple use and sustained yield of the several products and services obtained therefrom." However, while the "multiple use" mandate of MUSYA broadened the purposes for which National forests may be managed, the Act did not further reserve National forests for multiple use purposes. See United States v. New Mexico, 438 U.S. §§ 696, 706-18 (1978). MUSYA defines "sustained yield of the several products and services" as "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of various renewable resources of the national forests without impairment of the productivity of the land." 16 U.S.C. § 531(b). Nowhere does MUSYA mention ecological sustainability or authorize it as a dominant use.

Although the National Forest Management Act ("NFMA") does not define sustained yield or sustainability, NFMA requires forest planning to be consistent with the MUSYA. 16 U.S.C. §§ 1602,1604. Like the MUSYA, NFMA requires the Forest Service to consider environmental and ecological factors in land use planning. However, also, like MUSYA, NFMA does not elevate ecological factors above any other multiple-use nor does it require that National forest land use

plans be contingent only upon ecological sustainability considerations. The proposed alternative effectively elevates "ecological sustainability" above all other uses is based upon several faulty assumptions.

First, the proposed alternative wrongly assumes that the "sustained yield" mandates of MUSYA and NFMA require "sustainability." Thus, the proposed alternative expands the concept of sustained yield significantly beyond what is allowed by the MUSYA and NFMA. As stated above, "sustained yield" under the MUSYA simply means the maintenance of a regular output of several renewable resources.

Second, the proposed alternative wrongly assumes that all sustainability must be predicated upon ecological sustainability. The proposed alternative assumes that sustainability (or sustained yield) of any sort cannot be achieved without first achieving ecological sustainability. However, this assumption is false. While biological diversity undisputably affects certain legitimate uses of National forests, it is not essential to multiple use and sustained yield, as defined by the MUSYA. For example, timber harvest and water flows can be managed on a sustainable yield basis (as required by statute) with little species diversity. On the other hand, some uses, such as recreation, may require a high degree of species diversity (fishing, research, wildlife watching), while recreational uses of the forest require little or no species diversity (rock climbing, skiing). Still others, such as mining, require no species diversity whatsoever. Certainly, ecological sustainability and species diversity are important considerations in forest land use planning, and are often essential to maintaining certain legitimate uses on a sustained basis. However, the assertion that species diversity is absolutely necessary to maintain the sustained yield of multiple goods and services is unsupportable, and cannot justify elevating the primary focus of land use planning to species diversity. In sum, the proposed alternative should report and reflect the true nature and role of ecology in multiple use and sustained yield management not elevate it over the Congressional mandates.

Third, the proposed alternative wrongly assume that ecological sustainability as the primary focus of forest planning best meets the needs of the American people. The MUSYA defines "multiple use" as the management of various renewable resources in a combination which best meets the needs of the American people. 16 U.S.C. § 531(a). Elevation of biological diversity and ecological sustainability to the chief planning factor assumes a priori that such values, in all cases, best meet the needs of the American people; this presumption is in error and must be established on a case by case basis.

Fourth, in addition to not following the mandates of the Organic Act, MUSYA, and NFMA, the document states that the enactment of various other laws, including the National Environmental Policy Act ("NEPA"), the Endangered Species Act ("ESA"), the Clean Air Act ("CAA") and the Clean Water Act ("CWA") "reinforce ecological sustainability as the first priority of National Forest system management." Id. Again, this is incorrect; none of these statutes in any way change the mandates for the management of National forests. See e.g. Platte River Whooping Crane Trust v. Federal Energy Regulatory Commission, 962 F.2d 27, 34 9D.C. Cir. 1992) (holding that the ESA does not mandate that federal agencies violate their statutory authority in protecting listed species). For example, the document cites a policy statement set forth in the preamble to NEPA as a mandate to manage for ecological sustainability. However, as the courts have made clear, the NEPA is a procedural act only, designed to promote consideration of environmental impacts in federal

decision-making, and cannot mandate any substantive result. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 (1989).

In summary, the proposed alternative is built upon a tenuous foundation which assumes that: (1) various statutes require that ecological sustainability be the dominant consideration for all management of National forests; (2) sustained yield of various goods and services derived from the forests cannot be achieved without first achieving ecological sustainability; and (3) that ecological sustainability in all cases is the highest and best use of the forests for the American people. To be supportable, these assumptions would require significant legal, scientific, and economic data. As it is, such data has no been provided and these assumptions are false, therefore, the proposed alternative is flawed and should not be adopted.

Issue:
In order to achieve ecological sustainability as the proposed alternative defines it, the ecological condition of the project area must be within the range of those found prior to European Settlement.

1. This standard is illegal and inappropriate under applicable law. First, legitimate multiple use activities such as timber harvest and mining rarely occurred on a large scale prior to European settlement. Thus, to achieve ecological sustainability, such activities must be excluded. This is a violation of the Organic Act, MUSYA, and NFMA.
2. Second, no statutory authority exists which mandates that ecological conditions of any kind must reflect pre-European settlement conditions.
3. Third, the assumption that ecological conditions prior to European settlement are better than conditions at any time since then is a purely subjective value judgment, and is not appropriate to consider during the planning process.
4. Finally, the scientific evidence which suggests what ecological conditions were like prior to European settlement is highly speculative. Basing all planning and management around a range of variability which can never be definitively determined is illusory, arbitrary and capricious and violates the Organic Act, MUSYA, and NFMA.

Issue:
Identification of "high social, cultural, or economic value" and "desired" levels are subjective and requires an assessment and balancing of public values. For example, a particular species may have a high social value to a particular segment of the population, but a low social value to another. Similarly, a species may have significant economic value for a particular use (trees cut for timber), but have high social value in the context of an entirely different use (trees observed by hikers). Furthermore, these conflicting values may require entirely different "desired" levels. Despite these extremely complex and subjective determinations, the proposed alternative provide virtually no explanation or guidance regarding how these levels and values were established. This extreme discretion is not allowed by the Organic Act, MUSYA, and NFMA, which require that forests be managed for a variety of uses.

Issue:
Under applicable law, economic and social considerations are just as important ecological analyses and should be given equal consideration. This is especially true for the social and economic concerns at the state and local level. Consider the following:

1023

1. The Organic Act has long been interpreted as requiring that National forest lands be managed to promote the local economic and social stability of the dependant communities. The first Chief of the Forest Service, Gifford Pinchot wrote: "*In the management of each reserve, local questions will be decided upon local grounds . . . . sudden changes in industrial conditions will be avoided by gradual adjustment after due notice . . . .* " Forest Service, United States Department of Agriculture, The Use Book (1906 ed.) at 17. The first congressional concerns for the stability of communities dependent on the resources of the National forests arose during debates surrounding passage of the Organic Act. The National Academy of Sciences had criticized past land management practices that allowed companies and individuals to cut excessive quantities of timber without monetary charge. Nevertheless, the debates surrounding the Organic Act centered on protecting the forests from fire and insect damage, ensuring that the forests serve to conserve water resources for the arid West, and managing the forests for economic purposes. S. Rept. No. 105, 10, 19. In fact, after describing the depredations of fire, livestock, and illegal timber cutting, one Senate report concluded: *A study of the forest reserves in relation to the general development of the welfare of the country, shows that the segregations of these great bodies of reserved lands cannot be withdrawn from all occupation and use and that they must be made to perform their part for the economy of the nation. According to a strict interpretation of the rulings of the Department of the Interior, no one has the right to enter a forest reserve, to cut a single tree from its forests, or to examine it rocks in search of valuable minerals. Forty million acres of land are then theoretically shut out from all human occupation or enjoyment. Such a condition of things should not continue, for unless the reserved lands of the public domain are made to contribute to the welfare and prosperity of the country, they should be thrown open to settlement and the whole system of reserved forests be abandoned.* S. Rep. No. 105, 22.
2. The notion of community stability grew out of Congress' concern for the impacts on local communities. During the passage of the Organic Act, Congressman Safroth echoed this concern: *The forestry question is not a matter of great concern from a national stand point, because the purposes for which these reservations are set aside are merely local. It is a matter of interest to people in the West only as to whether these reservations are properly established. It is on account of the waters which are to irrigate our agricultural lands that we are interested in forest reservations. . . . . The timber reserves of that region can never be a subject of national concern although they may be of great interest to the people of that particular locality -- the people of Colorado, Utah and other Western communities.* 30 Cong. Rec. 984 (1897).
3. Congress has never changed its concern for local communities. Eleven years following the passage of the Organic Act, Congress passed the Twenty-Five Percent Fund Act, under which 25 percent of the revenues from the national forests are returned to the states. 16 U.S.C. § 500. In 1913, Congress directed that another 10 percent of the National forest revenues be spent on road construction and local road maintenance. 16 U.S.C. § 501. In 1976, Congress amended the Twenty-Five Percent Fund Act to provide that the disbursement to state and local governments would be calculated from gross revenues, rather than stumpage prices. 16 U.S.C. § 500, National Forest Management Act of 1976, Report of Senate Committee of Agriculture and Forestry, S. Rep. 94-893 (May 1976) 1, 22-3.
4. These examples clearly illustrate that Congress intends National forests to be a driving force in promoting and sustaining state and local communities and governments, both