

9/12/05

OHV perspective of BLM Draft Alternatives

1. On page 63, West cold spring WSA has an OHV designation of "Limited (apply adaptive criteria). We would like to see this term used through out the document in place of the term "Limited to designated". The "to be designated" trail and road system in the Little Snake Resource Area leaves too much to interpretation, with out definition now and in the future. The people that use vehicles to gain access to their favorite place would prefer to have the use of "existing" trails and roads and "designate" closures on a route by route basis after determining that there is a need for a closure. The process of identifying "new" routes or ones that need mitigation because of an environmental impact will be much simpler. Posting closures on these routes will be a lot less time consuming in light of BLM's budget and time constraints, there by having a greater success rate. A travel management plan needs to be workable to have success and satisfy all of the issues. Through signing and rehabilitation the "closed" trails and roads would be easily identified.

There are trails and roads on the majority of BLM property. NWCOS and the BLM have focused on less than 30% of the total resource area. There is another 70% of the resource area that also has trails and roads. Is every trail and road going to go through a process to determine its usefulness and if there is any resource damage being caused? This process might not be completed in the next life time. There may be immediate needs for some closures that need to be addressed as soon as possible. A timely and efficient process needs to be used to determine what needs to be closed rather than trying to designate several hundred routes that will stay open. Designating trails and roads in some areas and not in other areas will lead to confusion on the public's part as to what is usable, thereby creating an enforcement night mare.

Appendix XX under Travel Management Planning, the last sentence say's "Route inventories would be conducted only to the extent necessary to solve identified management issues". With out a complete inventory, how are we to know where the "management issues" are? What roads and trails will be designated?

We would suggest to use "Limited (apply adaptive criteria)" through out the document and use posted closings on an as needed basis, and allowing travel on "existing" routes.

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2. Conflict Area closures. The draft states that there can be a seasonal 4 mile radius closure around Sage Grouse leks during the March 1 – June 30 time frame. That will be 32,000 acres if the Grouse are in only 1 square foot. If the leks are spread out over a hundred acres the amount of restricted area goes up exponentially. A ¼ mile radius closure affects 126 acres. There are closures for many other animals and plants mentioned in the Draft as well. There should have to be well documented evidence that the travel routes are causing harm to the population using proven scientific methods before any closings are put in to effect. The general thought has been for years that the travel routes have had a negative impact on the horse, deer and elk population. This general thought has not been proven to be true in our area, in fact these populations are at unsustainably high numbers. The “scientific research” that is being used at this time is providing inaccurate conclusions. The vehicle users in the Little Snake Resource area agree that there are animals and plants that need to be protected. We would like to see smaller affected areas, closed only at the time of year the animals and plants need protection. If the protection is needed for a substantial amount of the year then the routes affected should be rebuilt as to provide the same travel as before the closure. It also needs to say that the trail or road should be mapped (in addition to lek and nesting habitat) to prove that it is in nesting habitat. A trail going by a lek site, that is not near the lek, nor near any nesting habitat, should not be closed.

We would suggest "There may be seasonal closures to protect wild life and plant communities. These closures will be based on proven scientific principles that determine that travel is causing unsustainable harm to the community and the closure will last only as long as needed to protect the wild life or plant. If the closure is of more than 3 months in duration, new routes will be opened to provide the same travel experience as before the closure".

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3. Easements for access. We would encourage NWCOS to get behind stronger language for this issue. There are thousands of acres "land locked" by a few private acres. Whether we are hiking, drilling, riding, grazing or flower picking, this issue affects all of the public. There have been hundreds of miles of roads built over the years by the government that are now inaccessible to the public that paid for them. We would like to see the BLM identify the parcels that need access around private land and set in motion a process to correct this situation. It should be one of BLM's highest priorities to provide reliable access to the public lands that it manages.

We would suggest "Actively pursue easements through private land to access "land locked" public land. If the easement approach is not successful then there will be new access built, bypassing the private land. Access to all the public land in the Little Snake Resource area will be obtained". (page 137, Lands and Realty, paragraph 2)