

“124 Ideas”

(a brief background summary)

Prior to the publishing of the Record of Decision/Resource Management Plan (RMP) in May 2007 (of which the “TMP” Travel Management Plan) is part of; the BLM received a (one) protest letter from the following parties: Arizona Wilderness Coalition, Natural Trails & Waters Coalition, Sierra Club-Grand Canyon Chapter, and Center for Biological Diversity. Their protest letter contained 16 issues. The letter from these organizations, some of which simply “live to litigate”, contained some of these broad ranging, generic, boiler plate, generated issues: (Take 30 seconds to read them. This is what the BLM and we as OHV (Off Highway Vehicle) users have to contend with.)

Then, see the following “124” ideas for help in putting your thoughts and ideas on paper. Many of the ideas come directly from the language (reversed for our use) used in the BLM’s approved RMP published in 2007.

Issue 1. “The proposed Plan does not manage sufficient acreage for Wilderness characteristics”.

Issue 4. “The FEIS (plan) contains prescriptions that are likely to damage and degrade the qualities of solitude, unconfined recreation, and naturalness and do not comport with the BLM’s guidance.”

Issue 5. “The proposed plan does not manage off-road vehicles or address travel management in accordance with the BLM’s legal obligations.

Issue 6. “The BLM failed to disclose the environmental consequences resulting from implementation of its Proposed Plan”.

Issue 8. “The Proposed Plan for the Lake Havasu Field Office fails to take into account both ongoing and foreseeable impacts from ORV (OHV) use, thereby underestimating the cumulative impacts of the Preferred Alternative.”

Issue 12. “The mitigation measures for damage from ORVs (OHVs) in the Proposed Plan are not sufficiently detailed or analyzed to be relied upon by the BLM. The BLM is also required to consider mitigation measures that could avoid or lessen these environmental impacts”.

Issue 16. “The current 2004 route inventory must be revised to eliminate those routes that cannot be verified as existing prior to adoption of the current RMPs and only those routes that were previously authorized should be carried over for analysis and potential designation for use in the forthcoming TMP (Travel Management Plan).”

A person can see from these very broad generic statements there is really no specific evidence or data to back up their issues or claims. This is why OHV users need to give valid, meaningful, specific, comments to help the BLM feel confident in making a decision to keep a specific trail open.

The list of “**124 ideas**” are simply ideas that you can use to help you describe your thoughts in your comment letter to the BLM. From your own experience on certain trails, you can use the ideas to help you crystallize your thoughts onto paper. You can take the idea from the “**124 ideas**” and use it to formulate your own ideas,(in your own words from what you have “cut and pasted”), you think can help the BLM feel justified in making the decision you are in favor of.

(**FORMAT suggestion**) When making the points as to why a certain section should remain open it will probably be helpful to both you and the BLM data analyzing team if you put the points in “**bullet**”, or **outline form**. This way in the “data analysis” step your points can be quickly reviewed, instead of having to dig them out of the middle of a very nicely written and grammatically correct paragraph.

124 puzzle pieces (ideas)

you can use to construct your comment letter

(Remember: Refer to specific trails and specific HN # sections of a trail)

1---D “open with mitigation”, monitoring, and or maintenance

Mitigation—only used how often, small groups average 15 or less vehicles

****Large UNLIMITED SIZE groups—cross purposes with Mitigation.**

“Numbers of vehicles”—pg. 112 of RMP—number one on list of limiting categories

“Types of vehicles, authorized users only, existing trails, designated roads”

2---Mitigation DEFINITION

: To cause to become less harsh or hostile : mollify <aggressiveness may be *mitigated* or ... channeled —

A : to make less severe or painful : alleviate

3---TRAIL OPEN WITH MITIGATION—this trail, for the 15+ years (for all the past years) I have been using it barely shows any signs of over use. Because of the challenge of the terrain the user is forced to go slowly thus the need to mitigate or make less severe the impact of motorized vehicles is not really necessary.

4--**Because of the type of terrain that this trail traverses in this section (HN ###) the vehicles are forced to go very slowly thus raising hardly any dust.

5--**Because of the type of terrain and character of landscape in this section of trail (HN ###) the motorized vehicles are forced to go very slowly and carefully to avoid breaking their equipment. 6--This type of trail is not conducive to large groups or fast travel, thus the impact is very minimal

7--**This trail section (HN###) is a rocky type of terrain that forces motorized vehicles to slow down to not break their equipment. The slowness of the vehicle travel and the rocky terrain further reduces evidence of over use, or evidence of erosion due to wheel spinning,

8--**There is very little evidence or erosion due to vehicle wheel spinning because of the roughness, steepness, and rocky layer on the top of the soil.

9--mitigate

Synonyms allay, alleviate, assuage, ease, mitigate, mollify, palliate, relieve, soothe

Related Words abate, lighten, moderate, soften, temper; cure, heal, remedy; amend, correct, emend, fix, mend, rectify, reform, repair; ameliorate, better, enhance, enrich, improve, melliorate, perfect, refine

10--Near Antonyms (opposites—we don’t do these!) harm, hurt, impair, injure; heighten, intensify, sharpen

Antonyms aggravate, exacerbate

11--Because this section (HN ####) has parts that are either very rocky or very steep it is necessary for most vehicles to air down their tires which not only gives them better traction, reduces the possibility of puncture but also (softens, lightens, tempers, relieves, ameliorates,) the impact on the soil and does not injure the visual character of the landscape.

12--Monitoring—we can monitor—let know, violators, help with enforcement—if trails are kept open—law abiding citizens will be able to help observe what goes on in the area. The current staff of rangers for the BLM has an impossible task of enforcing rules and regulations in the area they are assigned to! When areas are off limits to law abiding citizens—lawbreakers have a free hand in the area.

13--Maintenance—do regularly—trash, invasive plant species, and abandoned cars, reported and removed from the desert

13A--Responsible stewards of the desert—take children or grandchildren out to enjoy, appreciate and learn to Tread Lightly!

14--SOIL—erosion almost non-existent. We practice tread lightly principles. Hand out brochures at our meetings and talk about the fundamentals.

*** (several agencies endorse, sponsor, or encourage Tread lightly—Arizona State Parks, BLM, US Forest Service, Arizona Game and Fish, etc.)

**we can back up with any of the following points

15--TREAD LIGHTLY—5 PARTS OF PLEDGE

TTravel only on trails

Respect Animals, plants, and people

Everytime you go outdoors—think safety (fires—desert and forest included)

Always leave the outdoors better than you found it (we pick up litter)

Discover how fun the outdoors can be when you Tread Lightly (park and walk to areas)

16--Wildlife-openness of road area—not a good choice for a habitat

Quiet, slow, dust at a minimum

17--Because of difficulty of the trail speed and noise and dust at a minimum

18--Because of the obstacles of the trail—speed, noise, and dust are very low

19--Opportunity to enjoy a type of solitude—meeting no other people except in your group because of the difficulty of the trail

20--Increasing demands for recreation—this trail adds another dimension for the user by offering a chance to gain confidence by driving their vehicle in a responsible way and enjoying the new found abilities of their 4 wheel drive

21--With the rapidly increasing population enjoying the benefits that Off Highway vehicles can afford—this trail offers a bit more challenge to the user and helps to reduce traffic on some of the near by easier trails.

22--This scenic and challenging route gives the user an alternative to the nearby heavily used wide wash that in most places is wide enough for 3 vehicles abreast

23--This allows an older person the freedom to take a more challenging route in their 4 wheel drive vehicle instead of the well traveled wide wash nearby that could easily be driven by several vehicles side by side.

24--The only way a person is going to enjoy the beauty in this area is with a motorized vehicle. It is too far from the highway to walk! An older person is able to enjoy the great scenery from the vistas presented from the top of the hills on this route.

24A—Because of the distance of this area, from the nearest highway, the only safe way to reach this area of beauty is by motorized 4 wheel drive vehicle.

25--From the hill tops on this trip views of Lake Havasu all the way down to Parker Dam are possible.

26--This trail winds thru the very narrow wash in a very responsible manner avoiding damage to the surrounding terrain and vegetation.

27--When the “Brittlebush” (*Encelia farinosa*), a member of the sun flower family, is in bloom from the months of March to June, the slopes on each side of the trail are a beautiful sight.

28--This trail is a popular trail when the Brittlebush is in bloom from March to June. The plants do very well in their natural habit of the dry slopes on the sides of the trail. The trail stays in the bottom of the narrow wash not disturbing the plants on the slopes along the sides of the trail.

29--This section of the trail is an interesting and scenic alternate to some of the near by trails. It is a favorite of many of our club members because of its scenery and challenges.

29A—This trail is like a “scenic byway” compared to the wider more traveled wash nearby.

30--Because this trail has less traffic than some of the other trails in the area it offers the motorist the ability to experience “remoteness” with a minimal impact on the local terrain.

31--NEGATIVE IMPACTS OF TRAIL PROLIFERATION IN AREA BETWEEN PROPOSED OHV BOUNDARIES AND WEST MOHAVE

(Quote from RMP TMP—from “greenie zealots”)

32--*p# 2 Issue 8—“proposed plan fails to take into account both ongoing and foreseeable impacts from ORV use, thereby underestimating the cumulative impacts of the preferred alternative.” (what a “crock”—but we have to deal with it!)

33--***We can point out that since OHV use has experienced a great increase in the last 10 years there is very little evidence of trail proliferation or visual landscape character abuse (damage) in the area this trail goes thru (traverses, follows, navigates).

34--There is no evidence to indicate that users will suddenly start not using the well established trail thru this remote area and start creating new trails. (There is a strong desire to not get lost—self preservation) There is no documentation of the amount of new trails that has occurred in the last 50 years of use and recent 10 years of dramatically increased use.

*(the following are made up of language directly adapted from the BLM’s own RMP—feel free to “use the language rather directly”)

*****35**--The trail follows a well defined path allowing the user to maintain an optimal balance between authorized resource use and the protection and long term sustainability of sensitive resources as called for in the Approved Resource Management Plan for the Lake Havasu Field Office. The trail is able to do this because it is well defined with the topography naturally restricting the user to the existing trail. The topography further allows almost no offshoots and trail proliferation.

36--PRESERVE THE EXISTING CHARACTER OF THE LANDSCAPE

37--*(ARB AD) A Locker equipped truck can be driven in a slower, safer and more controlled manner as a result of vastly improved traction. This style of driving greatly reduces the likelihood of incurring vehicle damage and lessens the environmental impact as well.

38--Since most of the vehicles that would attempt this trail have “lockers” (or 4 wheel drive) the amount of wheel spinning and damage to the terrain is almost impossible to see.

39--Most of the Jeeps (vehicles, quads, side-by-sides, etc.) driving this trail because of the difficulty will have 4 wheel drive, or lockers, thus eliminating wheel spinning and damage to the terrain (soil, visual character) in the area.

39--This trail does a very nice job of following the terrain in a manner to promote the goals of Visual Resource Management.

40--The way the trail is laid out allows the motorized user to enjoy the challenge the terrain offers while also being able to preserve the existing character of the landscape. It also needs very little maintenance and management activity.

41--RETAIN THE EXISTING CHARACTER OF THE LANDSCAPE

42--The trail does an excellent job of navigating the topography in a manner to retain the existing character of the landscape. Because the off highway vehicles are running on very soft tires that are “aired down” there is very little trace of a trail in many places.

42A—The steepness, and rocky areas, do an excellent job of forcing vehicles to navigate the landscape in a manner that promotes the “preservation of the existing character of the landscape”. (lockers=no wheel spinning, air down=soft little impact, etc)

43-- Many times rain will erase all evidence of any trail at all. At the same time it allows the user to experience beautiful vistas and an easy challenge to their driving skills with an off highway vehicle while impacting the visual character of the land almost not at all.

44--WILDLIFE MOVEMENT CORRIDORS—p#18, map 9-BLM RMP (a total of 15 wildlife movement corridors will be allocated—these corridors overlap the draft of Arizona’s Wildlife Linkages workgroup map.)

45--**“Wildlife movement corridors will be maintained for biotic diversity, to minimize fragmentation of habitat and to minimize barriers to movement.”

46--**We can make the point of how often we use the area (number of runs by the club), how our runs are a minimum # of vehicles, going very slowly, raising as little dust as possible—have as little impact and stress on animals in the area.

46A—The fragmentation of wildlife habitat is minimized because of---#46.

47--**Additional point—Wildlife Movement Corridors-- Map # 9 opposite page # 18 has a corridor marked # 4. This is a VERY LARGE corridor. It extends from the Mohave Mountains (the mountains behind LHC that Crossman Peak is part of) way down south east to the Bill Williams mountains (the mountains that are off to the right as we go in from the scenic turnout on # 95 south.)

48--**WILDLIFE HABITAT AREAS—Map 6 LH RMP—(whole area around LHC is designated as a Wildlife Habitat area!)

48A—Since wildlife (bats, snakes, lizards) seem to adapt and thrive in my back yard, or on my patio—I fail to see how a responsible driver going slowly, raising

almost no dust, because of the slowness dictated by the difficulty of the terrain would impact wildlife in the area this trail goes thru. BLM has not offered sufficient data or evidence to support that wildlife is or will be impacted.

49--**One solution by BLM is to require vehicles to stay on existing roads and trails (for the scaly sandplant and fringe-toed lizard SE of Parker) —we point out that because of the terrain and remoteness (and possibility to get lost) vehicles almost totally stay on the roads and trails in this area. This in turn has a minimal impact on plants and wildlife in the area. (Including the fringe-toes lizard!!—if you are SE of Parker!!)

50--MANAGEMENT DECISIONS—RMP p# 13

51--GIBRALTAR—SPECIAL RECREATION MANAGEMENT AREA
(Page # 76 in Record of Decision and Approved Resource Management Plan)

52--**These are some of the desired conditions (approved) for the area our club has Vampire Mine Trail, that Shea Road goes up into. These conditions are very applicable for our trails all around LHC and the area surrounding Standard Wash OHV area.

53--Desired Future Conditions for Gibraltar RMZ 2 – Cienega will be generally managed for Rural Developed providing the following:

54--Niche Motorized access to back country (from BLM's own words #55-#60)

55--Niche Motorized access to back country trails in natural scenic environment with plentiful opportunities for cultural and wildlife appreciation and interpretation of the historical mining district.

56--**Management Objective** Manage this zone to provide opportunities for community residents and regional, national, and international visitors who use the area seasonally to engage in sustainable primitive day-use/camping, OHV touring opportunities, technical rockcrawling.

57--Opportunities will also be provided to learn about historical mining and to gain appreciation of the natural setting of the greater Gibraltar region through self-discovery. Recreational use and environmental education will be prioritized to enhance a more primitive experience; minor developments and regulatory signing may be used moderately.

58--Primary Activities- OHV touring/ATV

58A-- Technical motorized trails

58B-- Dispersed camping

58C-- Cultural/historic sightseeing

58D-- Wildlife watching

59—Experiences

59A-- Developing skills and abilities

59B-- Testing personal endurance

59C-- Enjoying risk-taking adventure

59D-- Savoring the total sensory experience of a natural landscape

59E-- Escaping everyday responsibilities for awhile

59F-- Discussing equipment with others

59G-- Feeling good about the way shared cultural heritage is being protected

59H-- Enjoying access to outdoor amenities close to home

59 J-- Having others near by to help

60--Benefits Personal:

- 60A-- Greater self-reliance
- 60B-- Improved skills for outdoor enjoyment
- 60C-- Closer relationship with the natural world

61--Constructive Comments **from Recreation 2000, a Strategic Plan, U>S>
Dept of the Interior, BLM, first published in 1989 and reprinted in 1990**

- 62--- The Federal Land Policy and Management Act (FLPMA) firmly established the concept of multiple use and sustained yield, with recreation as one of the principle uses
- 63--- The use of Public lands has economic implications in two ways, first as a direct benefit to the recreationist and second as value on the impact on local economy and employment, just as the production of timber and oil and gas.
- 64--- The trend is for retirement people to move south or west, remain active and seek recreational opportunities on the Public Lands
- 65--- BLM's goal is to maintain the opportunities for **unconfined** recreational experiences while at the same time responding to the demand for more intensive, high density recreational opportunities.
- 66--- The goal of BLM's recreation policy is to provide a broad spectrum of Public Land recreation, in the amounts needed to meet the needs and desires of Public land visitors
- 67--- The BLM will assure through its planning process that all other multiple use resource management activities and actions consider the value of outdoor recreation outputs and benefits
- 68--- Our (BLM's) recreation- related facilities, including recreation sites, **roads, trails,** must be maintained in a manner that protects the public investment
- 69--- Recreation is big business
- 70--- Recreation has a high value and provides high benefits
- 71--- The Federal Multiple use areas are not assuring that recreation is given a level of emphasis commensurate with its value in making it an equal partner with other resources programs in budgets, staffing and planning
- 72--- leaving the route/trail open allows accessing and enjoying the natural attractions provided by the trail
- 73--- the route/trail is valuable for various types of unconfined recreational uses, including (pick one or more) scenic areas, natural history, historical, paleontological, archaeological, and biological features
- 75--- the route/trail provides access to seasonal scenic opportunities from flowers to desert plants
- 76--- bats are nocturnal and not affected by daytime travel in the area
- 77--- traffic and litter are more prevalent nearer residential areas. Motorized access to outlying areas does not have this negative impact
- 78--- The bulk of the OHV activity is day use and does not have the long term impact of camping
- 79--- Closing the route cuts off access to recreational rock hounding and gold seeking
- 80--- This trail provides access to (pick one)
- 81--- Unique landscapes
 - 82--- seasonal cactus flowering providing photographic opportunities
 - 83--- seasonal annual and perennial flower displays
 - 84--- a panoramic view of Lake Havasu and the City

- 85--- The proposed closed route is in wash, which has a self healing effect on vehicle footprints
- 86--- The two routes provide different levels of use for differently equipped vehicles
- 87--- This trail provides opportunities for isolation from evidence of humans, a vastness of scale and feeling part of the natural environment
- 88--- The route/trail is a spur that exists for access to a (pick one)
- 89--- geocache area
 - 90--- meteorite site
 - 91--- gold dry washing site
 - 92--- technical OHV challenge
- 93--- the route/trail is a staging area for (pick one)
- 94--- a hiking trail
 - 95--- an equestrian unloading point
 - 96--- a bicycle path
 - 97--- a wilderness area walking path
- 98--- the route/trail is a destination to a (pick one)
- 99--- pictograph area
 - 100--- special scenic vista
 - 101--- recreational rock collecting area
- 102--- the route/trail is a navigable wash connecting to another trail
- 103--- the route trail leads to a mining claim (series of mining claims)
- 104--- the route travels through a wash that leaves little lasting trace of motorized activity
- 105--- the route is a two track ATV loop trail
- 106--- **COMMENTS FROM BLM ROUTE EVALUATION REPORTS**
- 107---This Route is regularly maintained by the OHV users who travel it
- 108---The route is an officially recognized right-of-way
- 109---This route is a recognized county road
- 110---BLM has not shown that the continued use of this route will impact State or Federal special status species, or their habitat or cultural, or any other specially-protected resources or objects identified by Agency planning documents, plan amendments or any other special area designations any more then would any other route, or acreage within the Havasu BLM Unit
- 111---BLM has not documented, nor provided specific rational in their determination that specific specie will be affected on this route.
- 112---BLM has not described the monitoring approach used that led to their decision to recommend closure of this route. They have failed to provide supporting data to justify closure
- 113---Burro's are not natural, special status specie. They are introduced specie, not indigenous to this desert area.
- 114---Bats are nocturnal, feeding only at night. Day time OHV use does not disturb them, nor cause them to leave there habitat area
- 115---Bobcats travel a specific feeding route as proven by trappers. BLM has not shown that closure of this route will have a positive impact on their food chain.
- 116---Mule Deer, Desert Sheep & Goats graze primarily at night, or early dawn and late dusk. BLM has not shown how closure of this route would positively impact their feeding habits

117---Desert Tortoise is not endangered specie in this area

118---BLM has not clearly identified how special specie are affected by OHV travel on this particular route

119---BLM does not now enforce dumping on any of the lands they administer in the Havasu unit. The Havasu 4 Wheelers and other groups have repeatedly picked up tons of dumped trash and returned the next year to find more. Closing routes near the town proper will not stop illegal Dumping, only enforcement and prosecution will do so.

120---Route Proliferation Concerns will continue regardless if this route is closed. Only signage and enforcement will be effective.

121---BLM has not recognized the recreational value of gold seeking, dry washing or meteorite hunting in the entire Havasu Unit. Closure of this route severely limits access to this type of recreation, especially for the elderly or handicapped.

122--- This route is a connector between two different trails

123--- This is a connector route that completes a loop trail

124--- The route is a connector that completes a destination trail