

December 31, 2010

To: BLM Lake Havasu Field Office TMP
Attn: Project Manager
2610 Sweetwater Ave.
Lake Havasu City, AZ 86406

From: Havasu 4 Wheelers
Bruce Speirs, President
Jim Bowen, Chair, Public Lands Access Committee
Darryld Kautzmann, Vice Chair, Public Lands Access Committee
P.O. Box 1486
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Re: Public Comment Form
See attached HN numbers and other documentation included at the end of this comment letter

The Havasu 4 Wheelers, a local 4 wheel drive organization composed of 150 families (300+ members), **strongly Supports the Access Alternative, Map D, with changes** as identified by named trails/tracks and BLM (HN) route numbers attached to this document and those submitted by other users. Our original hope was to support the BLM preferred alternative Map C. However, after detailed study of the impact of Route closure on Trails traveled by our club, **we cannot support the BLM Preferred Alternative Map C, which would close approximately 75% of the BLM individual HN routes to 2-track motorized vehicles in the Havasu BLM Unit.**

We have listed, at the end of this cover letter, documentation with comments and other supporting information of BLM HN routes that are proposed for closure and need to remain open.

Map C is impossible to support. Closure of 863 routes out of a total of 1140 routes effectively closes 23 of H4W destination or loop trails/tracks. (A user trail/track may be made of one to a finite number of BLM Routes). Closure of just one BLM route can effectively close, or cut off, an entire user Trail. We consider it a closure when motorized traffic is off limits, although as we understand it, BLM considers the route open when accessible to foot and horse traffic, yet closed to motorized vehicles. BLM's language and percentages are very misleading to the public, and based on what we have seen as a result of the Route Evaluation Process, and subsequent Map C Alternative, it would seem the Lake Havasu Field Office is protecting the Havasu BLM Unit from the public, not acting for the public.

We support the Access Alternative, Map D, HOWEVER, ONLY with the HN Route changes submitted below, and with comment letters submitted by other OHV users. Map D, as presently published still closes 572 BLM Routes, and would have the dramatic

effect of closing 50% percent of the trail/tracks we submitted prior to the earlier December 31, 2005 deadline. Both Map C and Map D have the added effect of closing many of the trails used by other local user groups.

We, as an organization and as individuals, have grave concerns with the Travel Management Process. It is evident that this is not a Travel Management Plan, rather a Route Management Plan. The Route Evaluation tree is flawed! Only routes are mentioned, with no recognition given to trails or tracks used by the public. BLM does not have the expertise, or equipment necessary to travel many of these routes/trails. In fact, it is questionable whether many of the current BLM personnel have been over some, or any, of the routes or trails shown on their TMP maps. There was no Travel Management Specialist involved, who either knew, or traveled the Havasu Unit regularly, nor is there any data input regarding the ongoing use of trails/tracks by the Public. Also, the RET documentation states virtually “all of the routes are not maintained”. These routes (trails/tracks) are all regularly maintained by the continual driving of the users, who repair washouts, install drain diversions, clip invasive plant species, and pick up trash left by others.

BLM had four years prior to their October 1, 2005 Draft Management Plan release in which to prepare the public. During that period there was virtually no local BLM publicity regarding the Plan, in spite of NEPA’s requirement to notify everyone affected in the area. Yet the public was notified by only one news article, of a local meeting, to review the Proposed Draft Management Plan. At that meeting the limited number of people attending (due to inadequate publicity) were informed they had 90 days to read a 1000 + page set of two volumes, digest the proposed impact, and respond with public comments. No further publicity was generated by the BLM to inform the public of potential route/trail closure. Many of the user’s of these routes/trails were not even in the area to learn of the 90 day comment limitation, as they are snowbirds or winter home owners. Out of town weekend users were also unaware. Others, including the entire quad and motorcycle community, not organized into clubs, had no opportunity to submit Trails and missed out on the mapping deadline. Rock hounders, gold and meteorite prospectors, hikers, equestrians, sight seeing enthusiasts and photographers were not able to make comments, nor put missing trails/tracks on the maps. Consequently BLM failed to establish a total travel network.

BLM is required by NEPA to define OHV and to notify all OHV users of the EA (environmental assessment) or EIS (environmental impact statement). Then when they present the TMP they are required to notify the public of the meeting. BLM did not notify the OHV users of the EA that was done. They did contact a few local off OHV clubs. Again NEPA requires BLM to make proper notifications to ALL OHV users not just one specific group.

Participants at the October 2005 meeting were shown proposed Route maps. BLM had four to five years to drive all of the routes/trails in the Havasu Unit. As we realize, NEPA requires BLM to do a complete route survey. However only a limited area was driven by inexperienced BLM personnel using a quad. A few more routes were picked up by

reviewing old maps. According to one of their personnel, BLM did not even know about Google Earth until February, 2010, so they didn't have the ability to review their routes via satellite imagery. Upon inspection by the Havasu 4 Wheelers, it was found that some 50 Trails regularly used by the club were either partially or totally missing from the BLM maps. BLM did not have the manpower, or necessary equipment, to do an adequate Route mapping job. The Havasu 4 Wheelers mobilized and drove as many trails, used by the club, as we could GPS, within the limited time. The Club also submitted maps, with GPS coordinates and documentation, by the 90 day deadline, December 31, 2005. When told that BLM personnel would need to travel these Trails (combination of Routes) they lacked proper equipment. Club members again drove the Trails with Temporary BLM Interns as passengers, GPS'ing routes themselves. However, these Interns were told by BLM supervisors to only drive and GPS the missing routes. Later, BLM review personnel failed to recognize that the GPS'd routes were small parts of larger loop or destination Trails. Other OHV users were unable to contribute.

For the next four years there was little or no publicity regarding route designation in the Havasu BLM Unit. Contact was maintained by the few user groups aware of pending route decisions. During that period the Havasu 4 Wheelers worked with annual desert cleanups several times each year. BLM has yet to prosecute anyone for illegal dumping. The Club hosted trail events when asked by BLM, and provided labor to fence approximately 18 dangerous mine shafts and adits

In the spring of 2010 the BLM Route Evaluation Teams, preparing for the final Route recommendations, were offered maps with the H4W Trails highlighted. But the maps were refused. User groups asked to be on the Review Teams, or to be able to provide input for the Route Evaluation Process, and they were refused. BLM did provide a one hour revue of the Route Evaluation Tree process to a small representation of users. Subsequently BLM review teams did not understand the concept of a Trail system, or route network, only individual routes of a few feet, up to several miles. BLM was not able to recognize that closure of one BLM (HN) route could block or cut off a complete trail, or destroy a Trail network. They have no knowledge of traffic patterns or trail usage requirements.

Review teams, using a contracted process called the Route Evaluation Tree, with direct instruction and supervision from its creator, gathered information on resources in the area. The BLM and other agency specialists in wildlife management, geology, archeology, grazing, etc., all submitted data. This left the "Outdoor Recreation Planner" as the sole defender of the OHV community. This "Outdoor Recreation Planner was not equipped with vehicles to travel the desert. The Specialist did not have OHV experience, and had very limited knowledge of the OHV sport. The Specialist does not participant in any of the sports he is supposed to be managing. None of the reviewers have actually traveled all of the routes they were reviewing. No one went outside and actually looked at the terrain. All decisions were made inside, off a map, with a bunch of lines, without the knowledge of exactly what those lines represented. They did not take the time to see if the route they were reviewing was in use as part of a track or trail, consequently the OHV user groups were not represented and the travel networks (trails/tracks) were ignored.

Each individual route was reviewed as a separate, independent, stand alone, trail portion without reviewing it's relation to the overall network of trails. A number of OHV uses, such as gold seeking and meteorite hunting, common throughout the entire study area, were ignored.

The Route Evaluation Tree is also static in time. Just prior to the December 2005 deadline, side by sides and buggies (rock crawlers) were joining the motorcycles, quads and jeeps as new, but rapidly growing OHV sports. They were completely ignored and lacked input or the opportunity to record trails they used, on the BLM Maps.

Again, in the spring of 2010, the Havasu 4 Wheelers, contacted the local BLM in writing and in person, stating the proposed 30 day comment period was inadequate and requested that it not be held in the summer or fall when temperatures commonly are in the triple digits. Fire danger is high and many local residents and snowbirds are gone, and weekenders do not travel the desert during the hot periods. The comment period was opened for 30 days on August 18, 2010 without an explanation for the timing. With one news release, announcing a public meeting, only 88 people, of the thousands of users, were aware of the meeting & present. Through the efforts of a few individuals, enough concerned citizens contacted the field office to gain approval for extending the 30 day comment period until October 31, 2010. Yet many of the citizens, who use this desert, are not back and still not aware of the pending Route closures.

At the public hearing, wall maps were inadequate and hard to read by the 88 people in attendance. The maps were put on the BLM web site about 10 days later. Later, at users request, BLM did place input data on the web. Approximately 3,000 pages of data input and the recommendations were shown, but no reasons were given for the decisions to close, limit, or open mitigate the 1140 individual Routes. A formal request was made for documentation that would show the rationale for the route recommendations. None was made available.

BLM personal repeatedly state that Map C, BLM's recommended alternative, would only close 25% of the routes. When questioned on their figures, BLM explained they were talking of miles of routes and referring to non motorized access. Even hikers must drive to get too much of the desert. In reality, data analysis of the program shows Map C closure of approximately 75% of the routes, cutting off motorized access to much of the BLM administered lands in the Havsau Unit. Even worse, BLM's Map B, the protection alternative, would close approximately 85-90% of the routes to motorized access, while Map D still closes 50% of the routes.

At present, within a 100 mile radius of Lake Havasu City there are twenty three Arizona Wilderness Areas, consisting of 1,287,365 acres and twenty five California Federal & State Wilderness Areas encompassing 2,393,490 acres. Also, within a 100 mile radius there are 32,857 acres of Wildlife Refuges, 1, 303,658 acres of Indian Reservations, 48,855 acres of Areas of Critical Environmental Concern, and 836,992 acres of military proving grounds. This makes ALMOST SIX MILLION ACRES CLOSED TO Off HIGHWAY VEHICLE ACCESS, not counting BLM areas handled in a "Wilderness

Like Manner”, all within 100 miles of Lake Havasu City. A recently acquired BLM document titled “Treasured Landscapes” proposes to do away with multiple use management and to add an additional 35 million acres of private and other public lands to the 130 million acres it manages in “protective designations” in the west. The total 4 wheeling footprint for all of our historic Havasu 4 Wheeler trails within the Lake Havasu Unit is roughly 727 acres out of 204,160 acres (less than .004 or ½ of 1%) managed by BLM. How can this be too much to ask to keep open for Off Highway Vehicle use.

Lake Havasu City is a retirement and winter vacation destination. Many who live here, or winter, or vacation, come for the OHV opportunity. Many buy homes in the area just for access to the desert. OHV travel is not just running a mechanized vehicle around the desert. It includes users who geo cache, gold and meteorite prospect, hunt, enjoy flowers, scenery and photography, observe mine sites, enjoy and respect pictographs, ghost towns and other historic sites. Many are elderly, or with age related handicaps. Consequently they are unable to walk the desert, especially in the extreme heat common to the area. Virtually everyone who utilizes the desert must drive into it to reach their destination point.

A 2003 Arizona State Park study estimated OHV & related services had an \$182,000,000.00 annual impact on Mohave County. Local rock hounding, gem & mineral and gold prospecting clubs estimate they spend an additional \$36 million dollars annually. The same web site indicates that from 1998 to 2008 “OHV use in Arizona exploded 347%. Estimates, from those knowledgeable, also place the growth of off highway vehicle use at more than 5 times the 2003 figures or close to one billion dollars annually, for Mohave County alone. Extrapolation for La Paz County would total \$200,000.00. The growth in the popularity of this recreational choice creates a need for more motorized recreational opportunity, not less. The proposed closures by the BLM indicate a total disregard of the public’s needs. Decisions to close motorized recreation opportunities must not be made on the basis of theoretical or assumed impacts to the natural environment. Limiting access to the desert in the fall, winter and spring, would have as great an economic effect as limiting access to Lake Havasu and the Colorado River during the summer.

Again, we know NEPA requires BLM do an Economic Impact Study if route closures would affect Cities or Counties that are near the closures. They are also supposed to speak with local businesses on the effects of the closures to them. They did not do this for Havasu. The City of Lake Havasu is a resort town. People come from all over the world to enjoy what Havasu offers. BLM’s Map C closes 75% of motorized access to the desert in Havasu. Consider the economic impact this closure would have on Mohave County and Lake Havasu City. Lack of an Economic Impact Study is a NEPA violation and BLM needs to conduct such a study due of their proposed route closures.

However, it is not just an issue of economics. Members of the Havasu 4 Wheelers are responsible and practical environmentalists who love our desert. This is unlike one official at the BLM, a contributor to the decision to close our trails, who recently asked, “Why do you even go out there?” We relish the opportunities that our trails provide,

keeping us socially, mentally and physically active. Members' interests in the flora, fauna, geology, and history of these areas are shared with one another and as a result, respect for these God given resources creates a positive impact. Many of our members participate in desert clean-up projects removing tons of trash littering the landscape. As mentioned, under the supervision of the BLM, a group of Havasu 4 Wheelers also have used their time; gas and expertise to fence off dangerous mine openings.

This is also a family friendly recreation that provides an opportunity to strengthen family relationships, to experience and respect the natural environment, and to experience challenges and adventures that develop maturity. Camaraderie within a network of friends and family builds relationships and strengthens character.

BLM Staff turnover in this new Colorado BLM District has been significant during the past 5 years, especially in the Havasu Field Office, where 5-6 interim Field Office Managers each stayed for 4-6 months. There was even a turnover in the Districts top management. Few of the technical staff that started the process actually were still around to complete the review process. Few, because of required paper work, have even have attempted to travel the routes for which they have a management and decision making responsibility.

BLM should be promoting the Havasu area by becoming involved in the OHV sport. They should consider developing staging and parking areas, restrooms, trail heads safe driving literature and trail maps. Havasu could be promoted as a destination OHV area similar to Moab. New trails should be planned and implemented and fees charged only when a service is rendered.

Which brings us to closure. It is critical that the Lake Havasu City and Parker citizens and our winter visitors/vacationers, who are OHV enthusiasts, continue to have adequate access to the desert. This is especially true, in view of the acres in this area already closed to public access. We are also concerned that the OHV public is being set up for failure. Funneling more OHV traffic onto a drastically reduced number of routes, while the sport continues to grow, can lead to further closure. Many of the proposed routes are designated open with mitigation, which means they will be monitored for overuse, and possibly closure in the future. Mitigation was not mentioned in the Draft, or the Proposed Management Plans. A joint letter from environmental organizations raised the question of mitigation in responding to the Proposed Management Plan. Mitigated open was then used by BLM for approximately 80 percent of the proposed open routes. How can one letter have that impact on the May 10, 2007 Final Approved Management Plan? How will BLM monitor all routes equally in order to avoid arbitrary closure?

Again, we support the Access Alternative, Map D, with the additional HN route opening documentation attached and submitted by others. Please add our comments to the record and keep us informed of further action by your office.

