

## **BLM ROUTE SAMPLE COMMENTS, UTILIZE IDEAS IN WRITING YOUR OWN**

When the Forest Service receives comments from the public, there are three categories: (1) non-issue, (2) significant issue, and (3) non-significant issue. Here is an example of how this works:

### **1. Non-issue:**

Writing a comment saying "The route closures in Tahoe are BS and I disagree with them". (This would be classified as a non-issue - it is a general statement and is not a specific comment related to the proposal and its effects)

If you just say that you disagree with the closures and that it is BS, it is a NON-ISSUE in the eyes of the FS. It's read, but tossed aside.

### **2. Significant Issue:**

Specific comments regarding the proposal, specific disagreements with the proposal, not yet decided by law, regulation, or policy, etc.

If you give arguments and reasons as to why routes in TNF should remain open, attack the wording, the research, the assumptions, etc. in the DEIS, it is a SIGNIFICANT and SUBSTANTIVE comment. THIS IS THE TYPE OF COMMENT YOU WANT!!!

### **3. Non-Significant Issue:**

I support the BRC proposed alternative, (This would be classified as non-significant - general support for another comment already provided - as mentioned many times,

the GOVERNMENT AGENCIES DO NO COUNT VOTES. If all you do is say you support an organization and it's stance and comments, your comment will be listed as a "non-significant" letter

Please note, the term "non-significant" does not mean that the comment is simply thrown out and disregarded. It is a bureaucratic term. The Forest Service MUST read, review, and consider all comments. All the more reason to flood them with comments! Make them work!

Form letters are usually listed as "non-significant" That's why it's taking me some time to work out the letter generator. I need to make it where I just give "suggestions" on what to write.

Your letters CAN make a difference!

Just one letter from a person here on Pirate literally saved 300 miles of routes in Eldorado National forest.

Other things to keep in mind:

1. You DO NOT need to be a land-use expert or guru to submit a comment! DO NOT just leave it up to those guys! Everyone can and should send in comments.

2. Just because a route is on the preferred alternative DOES NOT make it safe!! Remember that the "other side" will be sending in comments to CLOSE routes!

I have been told BLM is considering closing Hawks nest which is your HN692. I first drove this trail with a group of male jeepers. Climbing rocks and squeezing through narrow passages really gave me a thrill. I talked about the fun run so much that a bunch of us women got together and had a woman's only driver run. Don't close it. I'm proud I was able to drive

**I am opposed to the closing of HN 692, Hawks Nest Trail** located in the Havasu BLM Unit. This is trail approximately 1.18 miles long, (entry is on HN690, Dutch Flat Road and also exits on HN690). It was GPS'd by the Havasu 4 Wheelers and turned in with a map printout, showing longitude & latitude, to the BLM office in the 90 day period (Oct.1-Dec. 31, 2005). BLM personal were driven over the trail in the spring of 2006 and GPS'd it themselves. **It shows up on Map C as closed.**

**Map D** also shows the Trail as Route HN692, and has designated it **open**

**HN692 documentation states inaccurately that this is a standard stock 4x4 route.**

Actually, the Havasu 4 Wheeler trail difficulty rating for this trail is a 3.5, Harder Moderate. In addition to a stock 4X4, it recommends 33" tires with aggressive tread; one locked differential, high & low gearing, for experienced drivers. It is potentially dangerous, with large rocks, ruts, steep slopes, loose surface, and narrow clearances that need to be negotiated.

**Hawks Nest (HN692 parallels HN 690, The Mohave Road to the east. This a totally different Route and does not duplicate Hawks Nest.** The Dutch Flat Road (HN 690) is a feeder trail to a number of other trails (routes). It is not challenging, being rated as a two. This route is considered easy, requiring the use of 2 wheel and some 4 wheel (2 wheel in the area adjacent to Hawks nest), while the Dutch Flat road may have some rocks, lose road surface, and ruts, it has a reasonable line for driving.

**Hawk's Nest (HN692) is a training trail.** Its moderate length (1.18 miles) is ideal for drivers to further develop driving skills after lifting & locking their 4X4. It is not dangerous, yet challenging. **Our club has also used it to train female drivers.** In fact a number of Powder Puff runs driven by and led by women, have been made over this trail

**HN692 documentation erroneously states this Route is not maintained.** Our club has driven this trail on official runs with small groups for years. Prior to leading a run on Hawks Nest (HN692), Run Leaders (Trail Boss), accompanied by one or two other jeeps (or more) will travel this route to insure it is maintained in a manner to assure safety. They will fill in holes and washouts caused by heavy down pour, they will check & correct erosion where possible. If necessary, they will do limited clipping of invasive plant specie such as salt cedar. They will pick up and remove trash & debris that has washed in or has been left by inconsiderate off roaders. The club run (and we do not charge admission, or registration) that follows, then continues the maintenance practiced by the pre run. In the past years the H4W have led many runs over Hawks Nest

**In closing, I reaffirm this route (HN 692) should be left open. Not only is the Route Evaluation tree documentation inaccurate and incomplete, the trail is one of the few short training trails now available. Should anyone break a vehicle, or become sick or hurt, it is easy to quickly move vehicles or individuals to the Mohave Road & immediate help.**

As you know, this is a very favorite spot for hundreds of seniors, many who travel for extended periods into the area during the winter. We all have favorite trails we find great pleasure in off-roading to AND WHICH, BECAUSE OF OUR AGE, CANNOT HIKE INTO

BECAUSE THEY ARE NOW CLOSED. Please, don't assume because we are not there the whole year through, that we won't be very angry if trails are closed to favor the hiking abilities of young environmentalists or ambitions of absentee politicians (oops, a little blunt, but this stirs me a bit.)

The comment I made was about the trails "being broken." I don't know if you've looked hard at any one trail but there are a lot of them on the .kml file map which are broken into pieces. Green lines go and stop and start up in the middle of nowhere. Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important

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

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

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.

Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. In order to avoid arbitrary and capricious decisions, site specific data and monitoring must be presented and demonstrate a measure significant impact.

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.

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.

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 Kaibab National Forest. 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.

Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value.

One of the basic requirements of NEPA is to “achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities” (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the natural and human environment. NEPA was not intended to be used to destroy the human environment. However, the agency is using NEPA to seriously impact the human environment through a series of travel plan decisions aimed at removing the motorized public from public lands. This trend is not right and must be corrected by implementing a pro-recreation alternative as part of this action.

The current set of alternatives does not include a Pro-Recreation alternative. NEPA requires analysis of all viable alternatives and all significant issues. A Pro-Recreation alternative is viable and needed by the public

The sport of extreme 4 wheeling has really only taken off in the last few years and is gaining popularity with the national competitive events regularly scheduled each year. Extreme rock crawlers are like professional athletes—there are not many in the sport—but they have a large “fan base”. They are like the NASCAR drivers—not many of them—but a much larger fan base.

These events of “extreme rock crawling” can have a very positive impact of the LHC community in the visitors and dollars it brings into the area as well as the local people that have been enjoying the local “extreme trails” for years.

Although nature created the Lake Havasu area “Extreme Trails” centuries ago, - waterways, gullies, washes—they are almost impossible to see because after each rainfall the tracks disappear and the rocks and boulders make the “trail” impossible for the average person to even realize that a vehicle could “traverse the trail”. The trails also don’t show up on maps, Google earth, or aerial photographs.

“I would like to request you consider having HN 619 remain an open trail. HN 619 is a scenic, challenging alternative to HN 605. I know they both start and end in the same place, but one is like a highway up a wash and the other is like a scenic route on a well established trail.” Then our members can all add the reasons they want to after they ask their specific request. Examples:

- a. One is most scenic
- b. One is more challenging
- c. I am old and can no longer hike—4 wheeling is how I see the desert

- d. I am physically disabled—enjoy desert in Jeep—this road offers variety
- e. This trail is well established—a club favorite—offers moderate challenges
- f. This trail is one of our club FAVORITES and provides a fun, interesting, challenging, variety, to access several club favorite trails
- g. This trail is well defined and has no off shoot trails that encourage trail proliferation
- h. Etc.

If we wanted to make any comment at the meeting—we could comment on the concept of the STANDARD WASH OPEN AREA. Example: By stopping the NE boundary at the line they are—there are many trails that will just come to an abrupt end! This will encourage people (out of town guests on a motorcycle) to just ignore the boundary and continue on. This will develop in them an attitude of “The boundaries really do not mean anything”—thus encouraging more violations! A much easier solution would be to use the natural boundary provided by mother nature—West Mohave Wash. It runs in the exact direction they desire and is a natural cliff/wall barrier with no trails continuing thru it! The very wide and much used West Mohave Wash would be a very easily signed, and enforced—and would make sense when people see it

While the idea of an open area in the Standard Wash area is a fine idea (good idea, great idea) by not using the natural mother nature created boundary of West Mohave wash the northern boundary is going to be very difficult to enforce it will invite people to violate the boundary it will encourage users to feel that enforcement is non-existent for the whole area around LHC if the northern boundary is not enforced. with the present staff, and budget challenges in the future—enforcement on an artificial boundary that does not make any logical geographic sense will be next to impossible

**The NEPA mandates that the federal government consider the “environmental impacts” of all federal decisions. If there is an environmental impact, the federal government also has to consider the economic, local tax base and social impacts of the community**

**Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important**

**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**

**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**

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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.

Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. In order to avoid arbitrary and capricious decisions, site specific data and monitoring must be presented and demonstrate a measure significant impact.

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.

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.

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 Kaibab National Forest. 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.

Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value.

One of the basic requirements of NEPA is to “achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities” (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the natural and human environment. NEPA was not intended to be used to destroy the human environment. However, the agency is using NEPA to seriously impact the human environment through a series of travel plan decisions aimed at removing the motorized public from public lands. This trend is not right and must be corrected by implementing a pro-recreation alternative as part of this action.

The current set of alternatives does not include a Pro-Recreation alternative. NEPA requires analysis of all viable alternatives and all significant issues. A Pro-Recreation alternative is viable and needed by the public

**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 work with land, resource, and recreation managers.** We are committed to resolving issues through problem solving and not closures

**Motorized recreationists are the only one to lose in every travel plan action.** The National OHV policy was not intended to be a massive motorized closure process but that is how it is being used.

The current BLM management trend towards massive motorized closures (25 to 75% of the existing routes) 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 that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors.

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 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/> ).he decision as we Lost Trail—  
Sample 2

Alternative C closes one of my favorite trails in the Standard Wash area. Alternative D leaves my favorite trail, THE LOST TRAIL, and several other really nice trails open. I hope you will reconsider your recommended alternative and recommend alternative D.

Both alternatives, C and D, close more roads and trails than I think should be closed. At least alternative D does so in a reasonable way considering the trails in the area most used. The TMP does not take into consideration the growing popularity of motorized recreation in the Lake Havasu area. While the lake is a great draw for people in the summer, the availability of off highway motorized recreation is a great draw in the winter months. With the older population in the area during the winter and the increased time they have for recreation, there is a large population that looks forward to their enjoyment of “off highway recreation” on public lands surrounding Lake Havasu.

Alternative C would close almost all of one of my favorite trails. It would close 5 sections: HN 154, HN 258, HN 332, HN 676, and HN 980

The Lost Trail sections above are all open in alternative D. This trail allows a person to go from the main Standard Wash road/trail HN 420 into an area of narrow scenic washes, pretty vistas, and moderately challenging hills, to connect with several trails to the South East. Because of the shortage of OHV routes necessary to reasonably meet the needs of

the public, every existing motorized route is extremely important. While the LOST TRAIL may not seem like an important trail, it is an important “link” for many trails to use instead of being forced onto a few main washes that are as wide as a highway.

Please consider keeping HN 154, HN 258, HN 332, HN 676, and HN 980 open, or just adopt alternative D—it solves issues with several enjoyable trails in the area.

Sincerely,

Signature

## II. Spaghetti Trail—Overview

Spaghetti Trail is a very nice moderate trail with fun sections of other trails included. It is 20-23 miles long depending on the variation. It takes just a bit over a half a day with a lunch break. The trail normally starts by going out Challenger and making it way via two options to join Dutch Flat road and then turn right or SE to where it joins the main road in Standard Wash. It then angles SE over the LOST TRAIL to where it catches part of THE MAZE trail and then ends up at the scenic turnout. It is a nice loop, with fine scenery, and moderate challenges that can be done with a Jeep with just slightly larger tires than stock.

Alternative C closes almost ALL of the Lost Trail (thus cutting out the middle of the run) and closes the part of THE MAZE (thus closing the end 1/3). So, option C effectively closes 2/3 of the trail!

Alternative C would close 5 sections (the LOST TRAIL) HN 154, HN 258, HN 332, HN 676, HN 980

It would also close HN 619 (THE MAZE)

\*\*\*Alternative D would not close any of the areas.

Reasons for closing—we can not see any real valid reasons for closing the above sections. We think the BLM evaluation did not adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access. They also did not consider the increased recreation time that the aging population has to enjoying public lands in their motor vehicles. Instead the BLM focused mainly on the potential impact of travel (not measured or monitored

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.

It is not environmentally and socially responsible to squeeze motorized recreationists into the smallest possible numbers of areas and routes, yet this appears to be the goal of alternative C. 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, as has happened in the past in the Standard Wash area.

\*\*\*\*This is also why the proposed Standard Wash Open Area should be enlarged to have as its northeastern boundary—West Mohave.

## **Standard Wash—Open Area—Overview**

Standard Wash area is one of the most used and favorite areas for most locals and many visitors on week-ends. The kiosk with the information boards is located at one of the main loading/unloading, parking, air-down, trail heads in the wash. There are 3 main entrances to the wash area off highway # 95. One is at the kiosk, the second is a bit south and east of the large gravel pit complex, and the 3<sup>rd</sup> is almost directly across from the paved scenic parking area on highway # 95.

The main trail area is an area south and west of West Mohave Wash to highway # 95. The BLM is proposing an “Open Area” to comprise about 2/3 of the main trail area. There is a large flaw in the BLM’s proposed boundaries. The natural boundary is provided by “mother nature” as “West Mohave Wash” on the northern and northeastern sides. This wash is a very wide wash and has almost no trails proceeding northeast of it because of rather high cliffs that make a very natural barrier. The large majorities of trails that start at the highway and head in the natural direction of the “washes” reach West Mohave Wash and then travel up or down it before heading back to highway # 95 as a loop. What the BLM is proposing is to make the first 2/3’s of the area open, but then close the last 1/3 of all the trails in the area that currently go up to West Mohave. By not considering the fact that almost all the trails go to the West Mohave area before they turn and start to loop back—the BLM proposed “open area” will cause many problems with the currently drawn NE boundary.

All different types of motorized vehicles use the area because there are trails of different difficulty, varied scenery, and width. Motorcycles, quads, side-by-sides, and Jeeps all have there favorite trails. To suddenly have a favorite trail stop at some “never before boundary” will unnecessarily create many problems.

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.

Enforcement will be almost impossible with the current staffing and budget of the BLM. Motorcycles and quads, coming up over a hill and seeing a sign saying a favorite trail is closed will simply swerve around the sign and keep going. This simple act will cause most people to deduct that the signs really do not mean anything—just ignore them. This would not be a problem with the natural boundary of West Mohave, because there are

really no roads heading off NE because of the cliff and mountain area on the NE side of the wash!

The idea of an open area is a good one. The area selected is an excellent choice of an area because of the many trails of differing difficulty and varied scenery. The area has the opportunity to be one of the premier open areas. Unfortunately, having a boundary in an area that will not make much sense to most riders will serve only to diminish the potential of a great area open to all types of motorized vehicles. Having the Northeastern boundary be West Mohave wash would solve a great number of problems.

Over the last 4 years, working with the BLM, local OHV groups and other user groups volunteered their time to GPS routes that were popular in this area. This helped the BLM in their own inventory of the area and showed where the public recreated.

The most recent BLM meeting was held this August 2010, with very little notice (2 days prior and nothing to user groups from other Cities) and as we understand it , this meeting was originally scheduled for November , but moved to August by the BLM. Hot weather months are the toughest for the Public to not only show up to meetings but also very difficult for them to be able to go out and justify their comments or verify what the BLM is proposing to close. *(recently , this comment period was extended to Feb 28, 2011)*

Another issue is the maps BLM used to show where routes would be open and closed. The public has a very difficult time understanding maps. Most of us look for familiar features such as washes, mountains or roads. BLM maps are devoid of all Topographical features making it almost impossible for the general public to locate their favorite trails or comment on what is being opened and closed.....

At a minimum, have a reference map available at your meetings and a PDF copy with the online information on the Lake Havasu travel management plan.

The maps at the public meeting did not have any features that would help the public locate familiar landmarks. Even with the addition of new maps that detail washes and terrain, the public just does not have the time to piece together the different maps available to gather the information to comment on the routes. We appreciate BLM giving all the data, but the general public just does not have the time to go thru it all let alone understand what all the information means. Though more work for BLM staff, using GPS tracks that the public submits of their favorite trails or loops, or letting the public mark on hard copy maps with topographical features and land marks such as roads the routes they think they use, would, in the long run, give you more defensible information.

AZOHVC and ATR, along with a wide variety of other user groups that include the Back Country horsemen association, have looked over the proposed map for the Lake Havasu travel management plan. From going over the BLM Travel Management Plan, it looks like BLM is proposing to close the majority of OHV routes.

ALL users groups access the BLM lands by motorized vehicles. Horsemen tow horse trailers, hunters drive trucks and Jeeps and ATVs /UTVs to their hunting sites and OHV use those routes.

Closing this much of the motorized route system will affect all users.

You have provided some routes for rock crawling and general 4WD, but are eliminating the vast majority of smaller OHV trails. Consider closing the redundant 4x4 routes and cherry stem dead end routes in exchange for useful single track, ATV and 4x4 looped routes. Making these routes multiuse OHV routes will also add to the managed non motorized routes and allow you to double the funds available to maintain these routes.

WE would respectfully request all the route reports that indicate the route types for single track and ATV /UTV (note: at the time of this writing, this information was not viewable on the website). We suspect the BLM is closing these routes because of tortoise habitat and route proliferation. We would ask that you close primitive redundant roads and cherry stem dead ends instead. Our work with Hassayampa FO shows that closing a Redundant jeep road or cherry stem dead end, would better protect tortoise habitat acreage, by as much as 3 times better. If indeed the closures are based on habitat, we would request to see those tortoise calculations that back up the proposed closures.

Here are some route specific comments relating to single track and other OHV use:

- 1) The BLM couldn't have picked a worse time to release the maps for comment. It's way to hot to check on these routes and most of the seasonal residents are absent. Consider this next time, please. Public comment is one of the most important parts of your Travel management protocol.
- 2) Retain single track motorcycle trails. There aren't that many of them and it's an experience that is disappearing in many places. Trails HN984 and HN985 are a good half day's worth of riding and the geology is great. This area is also very popular with rock hounds, I myself check out the area every time I go. HN985 is really long, which is great because most trails in the area are short runs. This one is where you can really get into the flow and enjoy motorcycle and trail. Long distance trails help move use out and reduces the "load" on close in trails, dispersed use is a must to reduce conflicts with other users and increase safety from reduced traffic.
- 3) HN644 - Keep this single track and close adjacent redundant/ cherry stem roads if you need to reduce route density. Furthermore, 644 comes from the "open" area and closing it at the boundary seems unnecessary and difficult to manage.
- 4) HN620 - Keep this trail since it offers a half day of riding when combined with HN644. . Singlet rack is hard to find and truly an experience you can't get everywhere. There is no shortage of jeep trails in this area!
- 5) HN693 has a convoluted mass of routes adjacent to private land. I don't know this

spot from the map, but it seems to us that it's unnecessary and being right next to private land isn't a good idea due to private property rights. Close and use this closure to keep other OHV routes open.

6) What were the criteria for proposing routes that cross private land? Are there plans to secure all routes that cross private land, or simply wait for them to be closed, one by one? We would suggest acquiring the main route as an easement or simply acquiring the land if your plan allows. If access or easement can not be acquired, consider rerouting these connectors on BLM lands similar to proposed relocated routes in the BLM Table Mesa OHV plans. Consider closing HN696 to limit the crossing of private land to one crossing on HN29A and seeking the access across the private land for the long term. Game and Fish have worked well with us and the Hassayampa FO on this issue at Table Mesa OHV area.

7) The rock crawl area north of the private land on inset map 5 (where HN696 is) doesn't have a connection to the trail system at HN607. It's proposed closed even in the access alternative. Seems like a poorly planned rock crawl area. HN700A/HN607 needs to be open to connect to HN07A1. Need access.

8) In the preservation alternative, please identify the criteria that were used to close all but the main routes just outside the open use area. It seems really broad brush and closing trails at the open area boundary simply because it's a line on the map is unmanageable and arbitrary. The legitimate trails inside the open area need to connect to something outside the area. Looped, long distance routes and routes that allow users to visit other near by trails will reduce the wear and impacts to the open area. Though not an issue now, dust is still a consideration and reduced numbers of users and dispersed us will help reduce the dust in the open area.

9) In the preservation alternative, please identify the goal for habitat improvement or other desired condition that lead you to close most of the routes outside the open use area. Tortoise habitat doesn't exist everywhere and it is arbitrary to propose a mass closure when field checks could verify habitat. Just because it's labeled as category 1, 2 or 3 doesn't mean that every inch is occupied, or even suitable. We are sure the BLM knows that ungulates are very adaptable, so reducing the existing use in these areas by any amount would be an improvement.

10) ATV /UTV and Motorcycles use Jeep roads to form loops and long distance rides. Closing one jeep road that would have made the connection to a long distance or looped trail means dead ends and invites continued use of closed routes. Please look at information from user groups on how they use the routes! These users do not just run on Motorcycle routes or ATV /UTV routes.....MC run all routes, ATV and UTV run their routes plus Jeep routes. Please consider this when developing looped trails and closing routes.

11) All users, be it motorized or non motorized access their trails by motorized vehicles. Staging areas and parking areas trail heads are all accessed from motorized routes.

Without the nonmotorized trail locations, the nonmotorized user groups can not make informed comments on what routes to save or close.

13) From going thru the individual route evaluations (hard copy acquired thru BLM State Office), most of the area in this Plan is considered a high use SRMA area, yet you are closing large numbers of routes, especially single track and ATV.

Where is the information on how the SRM Area is to be managed?

14) Additional comments:

Access across state lands:

-One of the great things about Lake Havasu is the immediate access to state and BLM lands from where the pavement ends. Many streets simply end at the desert and provide miles of access. To access BLM areas from town, secure access to BLM lands across state land to HN448, HN719, HN782, HN792, HN770, HN053, HN770, HN779, HN783. It appears BLM is intending for these routes to be access and we support this. Access across State lands must be secured for long term access through easements. Please build a robust system to access trails from town by securing the access from the edge of private land to BLM land. Local advocates will work to secure the access, where necessary, across private land at the edge of town. Funding is available through the Recreation Trails Program, the new OHV sticker fund or private sector funding.

HN17B should have its state land easement secured, or in this particular case, there is a strip of BLM land where a road could be constructed within BLM land to avoid state lands altogether. We feel you should consider this as a portal access route and seek the long term legal access or put a new proposed road into the proposed alternative. Similar to the Hassayampa BLM field office work at the BOULDERS OHV area where an easement was purchased for access across ASLD lands.

15) Long Distance Travel Opportunities:

-Please make a specially designated route that connects to Kingman BLM and Phoenix BLM. The Hassayampa BLM identified such routes in the Table Mesa area on a special map. Connecting to the Dutch flat area by HN420 is very important to long distance travel. HN450, HN460 and HN490 have these same concerns because of the long distance access they provide between field offices. We worked to get long distance travel goals put into the Hassayampa BLM RMP and would like to see recognition of long distance connectors such as these. You don't have to improve the road condition, just protect it from closure by things such as solar/wind/geothermal farms, wilderness proposals and large scale mines. Dual Sport riding has become very popular in Arizona as well as nation wide, this type of long distance connectivity will benefit a growing number of recreationists.

Please be aware that we are currently preparing a plan for western Arizona to identify the long distance connector roads where multiple day jeep/ATV/Motorcycle trips can be done and we feel should be protected.

16) Providing additional motorcycle trails:

Please make a plan provision to provide up to 30 miles of single track motorcycle trails to areas desirable for motorcyclists. The area north and east of Standard Wash is the preferred area due to access and existing trails. While we cannot recommend specific locations for these trails at this time, we would like to see a single track trail system of approximately 40-50 miles over the next 10-15 years, including the existing trails proposed for closure. Dirt Bikes use all motorized routes to create looped trails, please consider this when looking at additional single track.

17) Regarding ATV width trails:

While some OHV enthusiasts would advocate specifically for ATV trails, the difficulty in maintaining a 50" trail in desert environments makes them difficult to keep to 50". UTV/ROVs and jeeps blur the line between jeep roads and ATV width trails. A simple distinction between one track and two track trails is sufficient. If you develop new primitive roads, make them wide enough for 4wd, which would include ATVs, UTVs and motorcycles, too.

18) Plan Maintenance:

Build into your TMP that you can "reroute up to 1/4 mile of a route to address issues that arise". Only a Determination of NEPA Adequacy (DNA) would be necessary, along with the standard clearances. Example, a section of route continues to be damaged by heavy rains, rather than continuing to repair the same area, reroute if possible to better location. This is especially important where you are addressing old mine roads that may have not been located in ideal locations.

19) Facilities to support the trail system:

Facilities don't appear to be proposed in this TMP. Although these facilities could be completed as part of a recreation activity plan, we suggest that you identify, programmatically at least, that new information kiosks and parking areas could be developed as needed to address, but not limited to, safety, legal compliance, and visitor satisfaction. Consider providing a map in the TMP of likely places where such things might be placed. This would assist you in getting funding from grants because the planning will already be done, with exception of the clearances and DNA.

20) Implementation and budget section of the TMP:

Please plan to use 501c3 organizations to accomplish the tasks of completing the deferred maintenance necessary to make the designated routes land health standard compliant. There is a statewide assistance agreement in place already allowing such assistance. Plan to apply for OHV sticker funds to accomplish this work.