

**New Mexico Off Highway Vehicle Alliance
13170-B Central Avenue SE
PMB #322
Albuquerque, NM 87123**



Elaine Kohrman, Forest Supervisor
Cibola National Forest
2113 Osuna Road NE
Albuquerque, NM 87113

March 19, 2015

Dear Supervisor Kohrman,

I am submitting these scoping comments for the Cibola Forest Plan Revision on behalf of the New Mexico Off Highway Vehicle Alliance (NMOHVA). NMOHVA is a statewide incorporated alliance of motorized off-highway vehicle enthusiasts that promotes responsible OHV recreation through education, safety training, land conservation and access, in cooperation with public and private interests, to ensure a positive future for OHV recreation in New Mexico. NMOHVA represents motorized recreationists in New Mexico including 4WD enthusiasts, dirt bike riders, and ATV/UTV users. The Cibola National Forest (CNF) subject to this Forest Plan revision process provides important recreational resources to the members of the public we represent.

Significant Issue #1

The recent and ongoing Travel Management decisions throughout the Four Corners area, and especially in NM, has significantly reduced the numbers and mileage of roads and trails available to the public for motorized recreation. This has created substantial problems:

1. The Forest Service continues to underserve the growing demand for OHV recreation in the area. Continuing to follow the current course of action will further exacerbate crowding on the remaining trails as motorized recreation continues to grow. The Forest needs additional motorized trails open to meet this growing need. The revised Forest Plan needs clear plan for how it will identify, track, measure, and respond to growing motorized user needs.

The fact that the Forest Service has not adequately responded to this identified recreation growth trend is a significant issue that must be dealt with in the current Forest Plan revision.

2. The existing motorized trail system and opportunity spectrum doesn't adequately respond to the existing public use pattern and profile. The Cibola National Forest has four mountain units: Sandia, Mt. Taylor, Mountainair, and Magdalena. These four units all employ radically different travel management plans that the Forest Service purports to "meet" the needs of its public. The Sandia Ranger District is adjacent to the largest concentration of population and ostensibly would serve the largest number of motorized recreationist. Yet, the Sandia Ranger District provides 100% of the single track width motorized trails on the Cibola and less than a single mile of motorized trail open to ATV/UTV's (vehicles < 50"). Conversely, the Mt. Taylor Ranger District, located several hours away from the bulk of the population served contains 208 miles of motorized trails for ATV/UTV's (vehicles < 65") and zero miles of singletrack motorcycle trail. The Mountainair Travel Management decision contains not a single motorized trail opportunity and none of the alternatives currently being considered on the Magdalena District include any motorized trail opportunities at all!

All three of these travel management decisions already made and the one still under consideration were made against a backdrop of clear, numerous, and documented requests by the public for motorized trail riding opportunities for motorcycles (specifically requests for single track) and ATV/UTV's. Clearly, the Cibola National Forest is significantly underserving a specific identified public needs for recreation. Specifically the public has requested a high quality designated motorized road and trail system that:

- Provides for the needs and desires of the full spectrum of motorized users: single-track motorcycle trails, ATV/UTV trails (50 – 60" wide) and 4WD routes.
- Provides varying degrees of challenge suitable for the full range of users from beginner to expert.
- Provides access to varied topography, scenic viewpoints, historic sites, and cultural sites.
- Provides access to enough high quality dispersed camping opportunities to provide solitude to those that seek it.
- Provides looped trails that provide a start and end in relatively close proximity
- Provide loops that provide a full day's activity for the various user types (motorcycles cover more miles in a day than a rock crawler, etc.)
- Provides links to create multiple-day extended backcountry excursions.
- Provides enough mileage to provide solitude and require self-reliance.

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- Provides areas or trails suitable for the specialized needs of observed trials motorcycles and extreme challenge 'rock crawling'.
- ATV/UTV trails nearer to the Albuquerque metro area to give people appropriate places and opportunities to enjoy the Forest using these increasingly popular vehicles.
- Single track motorcycle trail opportunities in the Mt. Taylor, Mountainair, and Magdalena Ranger Districts.

The fact that the Forest Service has not adequately responded to these identified public needs is a significant issue that must be dealt with in the current Forest Plan revision.

Significant Issue #2

Forest budgets are shrinking, putting trail maintenance at risk. The Forest doesn't have an adequate plan for how it will maintain its existing trails or support the growth of quality and sustainable trail systems in the future. There is a large, and mostly untapped, public resource that can be used to help fill the gap between trail needs and the current agency budgets. The Forest Service has not identified how it will recruit, and utilize public/volunteer labor and resources to create and maintain motorized trails. This lack of an identified plan to utilize public/volunteer labor and other outside resources (including funding) specifically to create and maintain motorized trail systems is a significant issue that must be dealt with in the current Forest Plan revision.

Significant Issue #3

Non-motorized users have been successful in further reducing motorized opportunities by claiming "conflict" with motorized users. The Forest has responded to these "conflicts" in the past solely by further restricting motorized use (further exacerbating issue #1 above). The Forest is under a multiple use mandate that requires a successful shared use environment. The Forest needs to develop a specific plan for how it is going to educate other user groups and properly set user expectations in a shared use environment.

This lack of an identified plan to educate user groups and properly set user expectations is a significant issue that must be dealt with in the current Forest Plan revision.

Significant Issue #4

The revised Forest Plan should include clear objective and goal statements of how the designated motorized trail system meets the need of enhancing public enjoyment and motorized user satisfaction of the Forest.

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We respectfully insist that the revised Forest Plan include a clear objectives and goal statements defining exactly how the Forest's motorized trail system meet and satisfy the users of the system. The agency's Travel Management Rule says, *"To this end, a designated system of roads, trails, and areas for motor vehicle use, established with public involvement, **will enhance public enjoyment of the National Forests while maintaining other important values and uses on NFS lands.**"*

The revised Forest Plan should contain clear language describing what actions will be taken to enhance the motorized public's enjoyment of the Forest and how the agency will determine if this TMR-mandated need is met. The revised Forest Plan should include specific language what the designated system should attain in terms of mileage, connectivity, variety of topography, diversity of challenge (different skill levels) and, above all, user satisfaction. The Forest Plan should include full details on the definitions, goals, and metrics (how are they going to measure) for quantifying all these categories of enhancement and detailed response plans if the designated system of roads, trails, and areas falls short in enhancing the quality of the motorized recreation experience on the Forest.

This lack of clear objective and goal statements how the designated motorized trail system meets the need of enhancing public enjoyment and motorized user satisfaction of the Forest is a significant issue that must be dealt with in the current Forest Plan revision.

Significant Issue #5

NMOHVA submitted comments on the draft "Assessment Report of Ecological / Social / Economic Conditions, Trends, and Risks to Sustainability" (Assessment) on July 30, 2014. In those comments, we addressed a significant issue regarding the shortcomings of the Assessment. After a careful review of the recently released (Feb 9, 2015) version of that document, we note that the agency has still not addressed, in any way, our comments. As our comments are already on file with the agency, we will not repeat the entire contents verbatim here. However, the "nut" of the comment made then is still a valid scoping comment now:

*"The problem we have identified is that Chapter 4 fails to describe how "recreation" is assessed. Recreation is referenced as a by-product of other multiple uses/resources (i.e. grazing, watersheds) but the chapter fails entirely to asses "recreation" as a significant, stand-alone resource and how it contributes to the economies."*¹

As the Assessment document continues forward with this critical error in place, we assert that this oversight is a significant issue. The omission of how the

¹ NMOHVA Comments on the Draft Assessment Report of Ecological / Social / Economic Conditions, Trends, and Risks to Sustainability, July 30, 2014.

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economic contribution of the recreation resource is assessed, if carried forward to the Draft Forest Plan revision will not allow the agency to craft appropriate goals and objections for Recreation. As the Assessment currently stands, the agency will not be able to evaluate, monitor, and employ adaptive management techniques to the Recreation resource.

This lack of clear documented methods or metrics for assessing the economic contribution of recreation is a significant issue that must be dealt with in the current Forest Plan revision.

Significant Issue #6

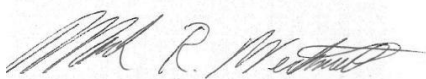
Those same July 30, 2014 set of comments also identified an additional shortcoming in the agency's set of data being utilized in the revision process. The agency is relying heavily on the 2005 VAB Survey Report. Our comments, quoting from the Report itself, identified the significant issue:

*"Participants expressed beliefs about accommodation and restriction of OHV uses of forest lands and the characteristics of OHV users. Unfortunately, there were no motorized users in this group, consequently the views expressed were primarily critical of these types of users."*²

We assert that when a distinct and important portion of the recreational user population was completely omitted from the data set, the data does not meet the scientific integrity requirements. Again, the agency has done nothing to correct this obvious and impactful shortcoming in critical data. This lack of appropriate, balanced, and statistical valid data constitutes a significant issue that must be dealt with the current Forest Plan revision.

Thank you for the opportunity to comment.

Sincerely,



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² Values, Attitudes and Beliefs Toward National Forest System Lands: The Cibola National Forest (2005), p. 19