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Organization: New Mexico Off Highway Vehicle Alliance

Title: Recreation Resource Director

Comments: Dear Supervisor Kohrman,

Attached are comments on the Draft Desired Conditions for the Resources, Goods, and Services and the evaluation of lands that may be suitable for wilderness for the Cibola Forest Plan Revision on behalf of the New Mexico Off Highway Vehicle Alliance (NMOHVA).

Sincerely,

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Excerpt from attachment copied here 9/24/15 for coding purposes.

"The text of the Desired Conditions does specifically address trail-based motorized recreation under Desired Conditions for General Recreation: "The Cibola National Forest welcomes a diverse group of visitors by providing a variety of developed and dispersed recreation and tourism opportunities (e.g. camping, picnicking, hiking, mountain biking, hunting, fishing, wildlife viewing, driving for pleasure, and so forth) that are appropriate for the recreation setting and other resource values."

The list of examples should include "motorized recreation" or "trail-based motorized recreation" in the same specific manner as was used for "hiking" and "mountain biking".

The same is true for the Desired Conditions under Dispersed Recreation. The draft document states: "Dispersed recreation is outdoor recreation occurring over broad expanses of the Cibola National Forest and includes management of a variety of motorized and non-motorized recreation opportunities. Examples of popular dispersed recreation include trail use, dispersed camping, wildlife viewing, hunting, fishing, plant gathering, and photography."

The agency may argue that trail based motorized recreation is included under "trail use". We assert that given the Cibola's history of ignoring the management of motorized trail use until the recent Travel Management Rule implementation, it is necessary to specifically call out this specific recreation niche in the Desired Conditions to ensure that the motorized recreation user segment is served going forward.

The same is true of the Desired Conditions - Motorized Recreation. The draft documents states: "Opportunities for off-highway vehicle (OHV) riding, driving for pleasure, motorized dispersed camping and motorized big game retrieval are provided on the designated system of NFS roads and motorized trails in accordance with the motor vehicle use maps (MVUMs). Visitors understand and comply with the designations shown on the MVUMs."

While a small start, we do not believe that the draft document provides enough information on how the agency determines the amount of trail based motorized recreation opportunities that are appropriate. Contrast the MVUM statement above with the Desired Condition statement taken from the Non-Motorized Recreation section: "The non-motorized trail system accommodates use levels compatible with other resource values and is consistent with public demand."5

The Motorized Recreation section includes no similar statement defining that the agency needs to meet demand requirements in a compatible trail system. We desire specific wording added to this section that addresses:

1. Providing adequate trails to meet the need of increased public participation in motorized trail use.
2. How the agency will assess whether the public's need for trail based motorized recreation opportunities is being met."

"We assert that management of an area as wilderness prior to it being "designated" as wilderness is illegal and definitely not in accord with the intent of Congress.

All of this (and more) was submitted to Secretary of the Department of Agriculture and the Chief of the Forest Service as a Petition for Rulemaking by NMOHVA in March of this year. While our request for rulemaking was denied, we cannot yet challenge the denial in court as there has not been any "harm" suffered (unsuitable lands being managed as Wilderness while waiting for Congressional action).

As the Cibola National Forest is farther along in its Plan revision than the other New Mexico forests, it is highly probably that any inappropriate lands nominated for inclusion in the Wilderness system by the CNF will provide the required "harm" necessary for us to challenge Chapter 70 and its illegal application in court."