

Data Submitted (UTC 11): 10/28/2024 5:28:59 PM

First name: CTVA

Last name: Action Committee

Organization:

Title:

Comments: We are extremely concerned that the Need for Change document incorrectly prioritizes ecology over community and leans heavily into a more preservation based system and way from the original intent of community supply of natural resources and economic generation to support our families.

The agency must adequately consider that the proposed action is not in conformance with the congressional laws that direct the agency to manage the project area for multiple-uses including recreation and motorized recreation.

1. The agency should adequately consider that motorized access and motorized recreation are the #1 use of the project area.
2. The agency should adequately consider that the lands in the project area are designated by congress for multiple-use.
3. The agency should adequately consider that lands designated by congress for multiple-use should not be managed by wilderness standards.
4. The agency should adequately recognize that signs of human use such as roads, trails, campgrounds, and dispersed camp sites are reasonable for land designated for multiple-use.
5. The agency should adequately consider that sharing should be the expectation on all multiple-use land otherwise multiple-use land becomes exclusive-use land.
6. The agency should adequately consider that the action should not illegally convert lands designated for multiple-use by congress into defacto wilderness areas.
7. The agency should adequately consider that the existing routes, mines, historic use, current use, and greater needs of the public demonstrate that the proposed non-motorized areas do not qualify as wilderness and, therefore, should not be treated as wilderness.
8. The agency should adequately consider that Congress recognized that management for multiple-use best meets the needs of the public and provided that direction in their multiple-use laws.
9. The agency should adequately consider that management for multiple-use best meets the overall needs of the public.
10. The agency should not apply wilderness standards to lands designated for multiple-use.
11. The agency should adequately consider that some visible use of the land for the good of the public is reasonable and acceptable.
12. The agency should not convert congressional designated multiple-use lands to defacto wilderness.
13. The agency should not circumvent congressional law and the wilderness designation process.
14. The agency should adequately consider that equality needs to be restored to public lands by restoring wide-ranging multiple-use management to all multiple use lands.
15. The agency should adequately consider that multiple use land should be used for the greatest good and not manipulated for elite and exclusive use only.
16. The agency should not reward those that demand exclusive use of resources.
17. The agency should adequately consider that public land is for the benefit of all the public (not just exclusive uses) which can only be reasonably accomplished by management for a broad spectrum of uses (multiple-use).
18. The agency should adequately consider that it is not reasonable to reward individuals unwilling to share multiple-use lands with exclusive-use of those lands.
19. The agency should adequately consider that the project area is not designated wilderness and that some visual use of multiple-use land is reasonable and acceptable.
20. The agency should adequately consider that managing lands designated by congress for multiple uses by wilderness standards is not legal.

21. The agency should adequately consider that there is a shortage of multiple-use land to meet the needs of 97% of the public because too much has been converted to wilderness or defacto wilderness which only benefits 3% of the public.
22. The agency should adequately consider that during the past 40 years federal agencies have created a shortage of multiple-use land by management action that have created an excessive amount of wilderness, defacto wilderness, segregated-use, and limited-use land.
23. The agency should adequately consider that it is acceptable and reasonable to put lands designated for multiple-use to beneficial use including putting people to work and providing quality recreational opportunities for the public that owns them.
24. The agency should adequately consider that beneficial use should be the #1 goal for all multiple-use lands.
25. The agency should adequately consider that developing and selecting a robust multiple-use alternative as opposed to a marginalized multiple-use alternative would better serve the over-arching needs of the public.
26. The agency should adequately consider the acres per wilderness/non-motorized visitor versus acres per multiple-use visitor both before and after the proposed action.
27. The agency should seek to develop an alternative and analysis that would provide a reasonable level of multiple-use and a decision that would provide more motorized access and motorized recreation.
28. The agency should adequately recognize that everyone has a duty to participate in sharing of public resources and especially on lands designed for multiple-use by congress.
 - a. The agency should adequately recognize that OHV recreationists are willing to share recreational opportunities with all other recreationists.
 - b. The agency should adequately recognize that motorized recreationists are not rewarded for their willingness to share.
 - c. The agency should adequately recognize that other users are rewarded for non-sharing behaviors.
 - d. The agency should adequately recognize that sharing of public resources by all users is a better solution than segregating all users and was not given a hard look.
 - e. The agency should adequately recognize that motorized recreationists are the only ones to lose opportunities in this planning action and every other planning action and the justice issues associated with that trend.
 - f. The agency should adequately recognize the issue associated with the statistic that a motorized route closed by the agency has never been re-opened even when needs and conditions have changed.