

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)

**P.O. Box 5295
Helena, MT 59604-5295**

September 23, 2026

Umatilla National Forest Supervisor's Office
Attn: Blue Mountains Forest Plan Revision
72510 Coyote Road
Pendleton, OR 97801

Re: Comments on Revisions to the Blue Mountains Forest Plan Revision #301397
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=301397>

Dear Project Team,

We submit these comments and issues on behalf of our members and other motorized recreationists for the Revisions to the Blue Mountains Forest Plan Revision #301397 project record. We value OHV riding on primitive trails and roads in public lands. The pandemic has highlighted public lands as vital spaces to relieve daily stress, with 98% of visitors seeking multiple-use activities like OHV recreation. Here are the reasons we strongly support OHV recreation:

Enjoyment and Rewards of OHV Recreation

- Recreational opportunities for all.
- Strengthen family bonds.
- Experience and respect nature.
- Enjoy a healthy sport.
- Relief from the stress present in today's world.
- Face diverse challenges.
- Share experiences and build camaraderie.
- Build and maintain accessible trails.
- Observe flora, fauna, and scenery.
- Seek adventure and enjoy the "flow."

Acknowledged Responsibilities of Motorized Visitors

- Respect and preserve the natural environment while balancing protection with human activity.
- Treat all visitors respectfully.
- Use vehicles responsibly and only in permitted areas.
- Collaborate with land, resource, and recreation managers to resolve issues constructively.
- Educate the public on responsible, motorized vehicle use on public lands.

Motorized recreation caters to a wide range of visitor interests and encourages diverse and multiple uses of public lands. It is important that this broad benefit is clearly reflected in the purpose, needs,

We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.

analysis, and decision-making processes. We represent many independent recreationists who enjoy public lands but might not have an organized voice during the public input phase. These multiple-use visitors include those who use motorized routes for activities such as family outings, camping, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, grazing, rock climbing, skiing, hunting, RV travel, target shooting, timber harvesting, fishing, wildlife viewing, snowmobiling, accessing mining claims, and collecting items like firewood, natural foods, and rocks. Notably, mountain bikers often prefer OHV trails because these paths are well-maintained and provide ideal surfaces for biking.

Multiple-use policies ensure access for visitors with physical challenges, including seniors and veterans who rely on wheeled vehicles. These visitors use roads and motorized trails for various recreational activities beyond just trail riding. Observations show that 98% of public land visitors participate in activities related to motorized access and recreation.

BASIC ISSUES

We have been listening to and documenting significant issues and information from our members, families, and friends for the past 40 years. Following this letter are significant issues and information to help the project team better understand how motorized recreationists have been negatively impacted by motorized closures in our national forests including the Blue Mountains. The agency's decisions have a significant impact on the quality of the human environment related to motorized recreationists and the agency should give the human environment adequate consideration. That has not happened under the current Blue Mountains Forest Plan.

1. Under the current Blue Mountains Forest Plan, the public has been significantly impacted by:
 - (1) widespread closures of existing motorized roads and trails have minimized the historic access and use of the forest that the public needs;
 - (2) harm to the natural environment resulting from declining forest health; and
 - (3) harm to the quality of the human environment caused by inadequate public access to roads, trails, and healthy forests.

The current Blue Mountains Forest Plan cumulative negative impacts on public access and recreation should be addressed by revising the Forest Plan and adopting a strong mitigation plan to address past negative impacts on the human environment.

2. Motorized access and recreation help reduce stress and support mental well-being. Considering the nation's significant mental health challenges, these opportunities should be protected and expanded. Any loss of motorized access and recreation resulting from the current Blue Mountains Forest Plan should also be appropriately mitigated as part of its revision.
3. Additionally, the current Blue Mountains Forest Plan has not been good for the natural environment either. Lack of access and active management of the roadless areas in the forest has led to poor forest conditions that produce hot, high-severity wildfires that destroy forest canopies, sterilize topsoil, and release massive clouds of greenhouse gases into the atmosphere
4. It is time to return to the principles envisioned by the first Chief of the U.S. Forest Service, Gifford Pinchot. His guiding principle was "... where conflicting interests must be reconciled, the

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question will always be decided from the standpoint of the greatest good of the greatest number in the long run."

5. While Gifford Pinchot did not use the current term "multi-use" or "multiple-use" during his initial tenure his "wise-use" philosophy served as the direct foundation for the concept. Under his "principles of conservation," he asserted that it is the direct duty of the Forest Service to ensure that timber, water power, mining, and grazing are all utilized sustainably for the benefit of the people. This balancing act became legally mandated through the Multiple Use–Sustained Yield Act of 1960 which also established outdoor recreation as a primary and equal purpose for managing national forests.
6. Together, the 2001 Roadless Rule and the 2005 Travel Management Rule have effectively created de facto wilderness on Blue Mountains lands that Congress designated for multiple use under the Multiple Use–Sustained Yield Act of 1960. Because the Forest Service is reviewing both rules, it should pause the Blue Mountains Forest Plan revision until those reviews are complete, ensuring the revised forest plan aligns with any resulting changes.
7. The Forest Service must evaluate both the natural and human environments through a balanced and impartial process. Its decisions should not impose substantial public impacts for limited natural resource gains, nor should they favor non-motorized interests or resource protection by creating defacto wilderness. Fair and comprehensive public lands management requires reasonable, justified revisions to the current Blue Mountains Forest Plan.

Thank you for considering our comments.

Sincerely,

/s/ CTVA Action Committee on behalf of our 500 members and families and friends
Capital Trail Vehicle Association (CTVA)¹
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Contacts:

Gary Petersen, President

Attachments: CTVA Comments for Revisions to the Blue Mountain Forest Plan

¹ CTVA members also belong to Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), New Mexico Off highway Vehicle Alliance (nmohva.org), American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Montana 4X4 Association, Inc. (m4x4a.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), and United Four Wheel Drive Association (ufwda.org)

CTVA Comments for Revisions to the Blue Mountains Forest Plan #301397

1. Motorized Recreation Access and Opportunities on Public Lands: Structured Alternatives and Recommendations

Executive Summary

In these comments, “Agency” refers to the U.S. Forest Service, an agency of the U.S. Department of Agriculture.

The following comments examine the significant negative impact that the current Blue Mountains Forest Plan has had on many visitors to public lands. These impacts need to be mitigated to meet public needs by expanded motorized access and Off-Highway Vehicle (OHV) recreational opportunities on public lands. Drawing on observed trail use data, national and state-level participation statistics, economic impact analyses, and current policy directives, the following comments provide structured recommendations for the Agency and stakeholders. Key findings demonstrate substantial demand for motorized recreation, significant economic contributions, and the importance of inclusive planning - especially regarding trail mileage, dispersed camping, e-bike access, and mitigation of negative impacts from closures. The comment document includes tables summarizing market data and trail use statistics and concludes with actionable recommendations and a comprehensive reference list.

Introduction

Motorized recreation - including OHVs, e-bikes, and related activities - represents a major use of public lands in the United States. Recent trends, legislative directives, and demographic shifts underscore the need for the Agency to reevaluate management practices to better accommodate this growing sector. Public stakeholders, policy makers, and recreation planners require clear, data-driven guidance to ensure that public lands are managed for both environmental stewardship and equitable recreational access.

When the investments, spending, and participation levels of motorized recreationists are fully considered, they represent the largest share of forest visitors and generate the greatest economic impact. Motorized recreation is a growing and important part of forest visitation. Revising the current Blue Mountains Forest Plan should expand motorized access and recreation and deliver meaningful benefits for public regeneration opportunities, health and the economy.

OHV Experience Requirements

A rewarding OHV experience depends on several factors: daily mileage, topography, points of interest, tread characteristics, rider capability, and technical difficulty. To accommodate a broad

range of users - from novices and families to expert riders – the Agency should develop site-specific mileage ranges based on recreationist input. For weekend experiences, a trail network spanning 40 to 200 miles for two days and 60 to 300 miles for three days is typically required.

The majority of OHV users seek dispersed camping linked to an accessible trail network. The Agency must also recognize the needs of individuals and families who participate in motorized recreation outside of organized advocacy groups and ensure quality recreational opportunities for their well-being.

Current Use and Observations

Long-term observations by the Capital Trail Vehicle Association (1999–2024) reveal that mechanized visitors (motorized vehicles, OHVs, snowmobiles) comprise 98% of public land users. Of 40,963 recreationists observed, 40,205 were mechanized visitors, and 15,539 were OHV users - representing 38% of all visitors. Trail use ratios favor motorized over non-motorized users by 11:1, and when including mountain bikes (also mechanized), the ratio increases to 24:1. Notably, 92% of trail users are motorized, rising to 96% with mountain bikes included. User conflict is minimal; in 25 years of observations, meetings between hikers, equestrians, and motorized users have been consistently pleasant.

Category	Number of Users	Percentage of Trail Users
Motorized (OHVs/4WDs)	16,789	92%
Non-Motorized	1,388	8%
Mechanized (incl. MTBs)	17,419	96%

Demographic and Economic Impact

According to Cordell et al. (2008), 18.62% of the U.S. population over age 16 (approximately 50 million people) engage in OHV recreation; in Montana, this figure rises to 28.7% (around 230,000 residents), plus substantial out-of-state visitation. These estimates do not include the significant number of youth under 16, who represent an important segment of OHV users.

The U.S. Bureau of Economic Analysis reports that motorized recreation - including RVing, boating, motorcycling, ATVing, driving for pleasure, and snowmobiling - contributes approximately \$80 billion annually to the economy.

SEMA market data estimates 30 million RVs, nearly 80 million OHVs/snowmobiles/dune buggies, and 36 million watercrafts in use nationally, with total participation rates for motorized recreation exceeding 45% of the U.S. population.

Vehicle Category	Estimated Number of Vehicles	Estimated Number of Users	% of U.S. Population
RVs	30 million	120 million	36%
OHVs, Snowmobiles, Dune Buggies	80 million	150 million	45%
Watercrafts	36 million	120 million	36%

Policy and Regulatory Context

Recent presidential directives, including the establishment of the "President's Make America Beautiful Again Commission" (July 3, 2025), mandate expanded access to public lands and waters

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for a variety of recreational activities. These efforts build upon legislation such as the Great American Outdoors Act (August 4, 2020), which provided funding for maintenance backlogs and permanently supported the Land and Water Conservation Fund. The Agency is directed to incentivize conservation, promote active forest management, and ensure responsible stewardship of public lands, with explicit attention to increasing recreational opportunities for all user groups.

Key Features of the EXPLORE Act

- ORLP program is now permanent, guaranteeing ongoing investment in urban parks.
- Tribal Nations gain direct access to LWCF funds for conservation and recreation.
- Good Neighbor Authority expands collaboration between states, Tribes, and federal agencies on land management.
- Recreation facilities receive modernization funding, including broadband upgrades and digital passes.

Major Provisions and Goals

- The Act increases outdoor recreation access for underserved communities, including Native American tribes and low-income areas.
- New accessible trails and opportunities are mandated for people with disabilities.
- Enhanced recreational and job opportunities for veterans and service members.
- Permitting for outfitters, guides, and nonprofits is streamlined.
- Park infrastructure improvements target overcrowding and promote less-visited sites.
- Wilderness climbing rules clarify activity access while protecting the environment.

Dispersed Camping Opportunities

Dispersed camping is a critical component of motorized recreation, offering stress relief and unique experiences for visitors. However, current supply is limited and in high demand. State and federal lands present numerous opportunities for expansion, and planning processes should prioritize the creation and maintenance of dispersed camping sites for both current and future visitors.

E-Bike and Single-Track Considerations

E-bikes have surged in popularity over the past five years and provide significant benefits to the human environment. Research indicates that their natural resource impact is comparable to mountain bikes. The Agency should permit e-bike use on all non-wilderness trails, with special provisions for individuals over 55 or those with qualifying physical limitations. Public input is essential in procedural considerations.

Additionally, motorcycle single-track enthusiasts contribute to trail maintenance and are willing to share trails with other user groups. The Agency should recognize these contributions and allow access for maintenance purposes.

Negative Impacts of Closures

Motorized route closures under the current Blue Mountains Forest Plan have had substantial negative effects on recreation, quality of life, and local economies. The cumulative loss of trails due to inadequate maintenance, natural disasters, and management decisions has been significant. The

Agency must quantify and disclose these impacts when evaluating management alternatives and prioritize motorized access over closure.

Recommendations

- Develop site-specific mileage ranges for OHV networks based on user input and technical difficulty.
- Expand dispersed camping opportunities and maintain existing sites.
- Include e-bikes and single-track motorcycles in all non-wilderness trail planning, with public engagement.
- Prioritize maintenance and restoration of existing motorized routes to prevent cumulative loss.
- Quantify and disclose socio-economic impacts of closures in all alternatives.
- Adopt education-based mitigation strategies in place of closure where feasible.
- Ensure recreational planning teams include representatives for all motorized user groups.
- Manage at least 90–96% of trail systems and public lands for multiple-use, reflecting observed demand.
- Implement robust public engagement processes to promote equitable trail access for all ages and abilities.

Tables and Figures

- Table 1: Trail Use Observations (see above)

Table 1

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS										21-Dec-25
Date	Vehicles Motorized Access (Note 1)	OHV/Snow	FWD/WoodC	MTN Bike	Equestrian	X-C Skiers	Hikers / Runners	General Area/Comment	Vehicles at Hiking Trailhead (Note 2)	
1999	5	342	37	11	10	0	25	See specific years and notes below	0	
2000	11	223	49	26	3	7	15	See specific years and notes below	0	
2001	433	425	58	28	36	3	12	See specific years and notes below	15	
2002	626	499	87	72	23	7	23	See specific years and notes below	46	
2003	904	651	17	66	18	10	27	See specific years and notes below	26	
2004	869	571	62	21	13	19	11	See specific years and notes below	35	
2005	1,322	847	89	38	29	6	20	See specific years and notes below	80	
2006	990	655	55	21	7	0	35	See specific years and notes below	18	
2007	948	603	27	42	22	17	2	See specific years and notes below	69	
2008	1,437	690	38	39	10	30	24	See specific years and notes below	12	
2009	1,227	894	85	35	7	17	4	See specific years and notes below	59	
2010	1,352	1,037	49	11	2	26	16	See specific years and notes below	5	
2011	1,194	766	80	16	14	9	14	See specific years and notes below	7	
2012	1,072	758	44	17	4	8	15	See specific years and notes below	15	
2013	1,000	673	47	15	0	0	29	See specific years and notes below	2	
2014	837	618	72	7	13	0	2	See specific years and notes below	0	
2015	1,071	695	67	13	3	0	15	See specific years and notes below	0	
2016	963	639	53	21	2	0	18	See specific years and notes below	0	
2017	540	342	17	16	0	0	10	See specific years and notes below	0	
2018	534	362	28	8	3	0	10	See specific years and notes below	0	
2019	388	264	20	6	0	0	11	See specific years and notes below	0	
2020	1,089	540	28	27	0	9	2	See specific years and notes below	0	
2021	826	556	16	17	0	0	9	See specific years and notes below	0	
2022	886	587	43	8	0	0	4	See specific years and notes below	14	
2023	1,164	645	36	22	5	0	7	See specific years and notes below	0	
2024	1,098	657	46	27	1	0	5	See specific years and notes below	0	
2025	1,037	714	45	14	2	0	2	See specific years and notes below	0	
Column Total	23,823	16,253	1,295	644	227	168	367		403	
Total Observations on Multiple-Use Lands = 42,777										
Mechanized Visitors Total =				42,015	Non-mech Total =		762			
Mechanized % =				98%	Non-Mech % =		2%			

Note 1A: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized recreationists.

Note 1B: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized recreationists.

Note 1C: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized recreationists. Many UTVs now have up to 4 passengers.

Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of use but are not counted because they are not visiting multiple-use lands.

Data Source: Capital Trail Vehicle Association

Our observations of recreationists on multiple-use public lands from 1999 through 2025 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 42,777 observations, 42,015 recreationists or 98% of the visitors were mechanized visitors (motorized vehicles, OHVs/snowmobiles).

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Additionally, the total number of OHV recreationists divided by the total number of people visiting public lands was $(16,253 / 42,777)$ or 38%.

Furthermore,

All visitors using trails totaled 18,954 $(16,253 + 1295 + 644 + 227 + 168 + 367)$

OHVs/4WDs totaled 17,548 $(16,253 + 1295)$ or 92% of all visitors using trails, and

Non-motorized trail users totaled 1406 $(644 + 227 + 168 + 367)$ or 8% of all visitors using trails.

Note that the group of 8% includes mountain bikes which are a form of mechanized travel. When including mountain bikes as mechanized users, then all “mechanized” trail users add up to 18,192 $(16,253 + 1295 + 644)$ or 96% of all trail users.

Therefore, the use of trails is 11:1 $(92/8)$ motorized versus non-motorized.

Therefore, the use of all trails is 24:1 $(96/4)$ mechanized versus non-motorized.

Conclusion, nearly all (98%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities as demonstrated by our observations.

Conclusion, 92% of the trail users are motorized and 96% when including mountain bikes which enjoy using the same trail tread and trails. Therefore, in order to be reasonably responsive and fairly address the needs of the public, at least 90% to 96% of the trails system and public land should be managed for multiple-uses including motorized access and motorized recreation.

Out of the 42,777 recreationists that were observed, 367 were hikers and 227 were equestrians and all of the meetings were pleasant. We have not experienced any “user-conflict” in 25 years of observations. Therefore, “user-conflict” is not a significant issue or a reasonable issue to justify closure of motorized routes.

Table 2: SEMA Market Summary (see above)

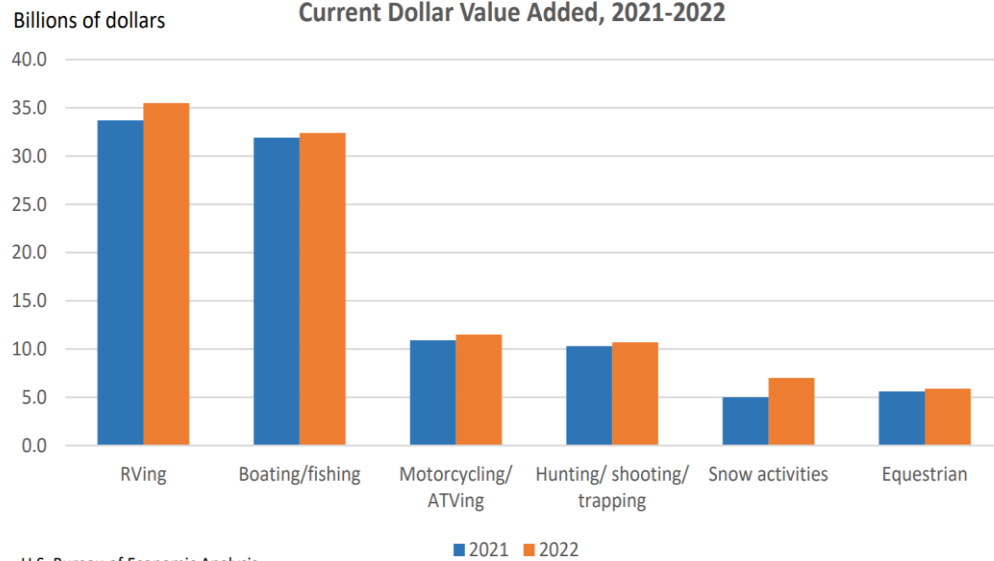
OWNERSHIP OF SPORTS / RECREATIONAL EQUIPMENT % OF TOTAL U.S. POPULATION				Source: 2021 SEMA US Market Data
	TOTAL VEHICLE OWNERS	ACCESSORIZERS	NON-ACCESSORIZERS	
OWN AT LEAST ONE	32%	49%	26%	
RV / Camper / Motorhome	9%	14%	7%	
ATV / Quad Runner	8%	14%	5%	
Motorboat	7%	11%	5%	
Golf Cart	5%	8%	5%	
Scooter	5%	8%	4%	
On-Road / Dual Purpose Motorcycle	5%	8%	4%	
Personal Watercraft	4%	8%	3%	
UTV / Side by Side	4%	7%	2%	
Off-Road Motorcycle	3%	7%	2%	
Go Kart	3%	6%	2%	
Snowmobile	3%	5%	2%	
Sailboat	1%	2%	1%	
Dune Buggy	1%	2%	<1%	
Other	1%	1%	1%	

U.S. Ownership of Motorized Recreational Equipment and Population Enjoying Them						
column A	column B	column C	column D	column E	column F	column G
Category	* Percent of U.S. population	** Total Vehicle Owners (U.S. Pop x column B)	Typical Number of Vehicle Occupants		Estimated Total Occupants U.S. Population (col C x col E)	Total Occupants Percent of U.S. Population (col F / U.S. Pop)
RV/Camper/Motorhome	9%	29,790,000	Up to	4	119,160,000	36%
ATV/Quad Runner	8%	26,480,000	Up to	2	52,960,000	16%
Dual Purpose/Offroad Motorcycle	8%	26,480,000	Typically	1	26,480,000	8%
UTV/Side by Side	4%	13,240,000	Up to	4	52,960,000	16%
Snowmobile	3%	9,930,000	Typically	1	9,930,000	3%
Dune Buggy	1%	3,310,000	Up to	2	6,620,000	2%
Totals	24%	79,440,000		Totals	148,950,000	45%
Motorboat	7%	23,170,000	Up to	4	92,680,000	28%
Personal Watercraft	4%	13,240,000	Up to	2	26,480,000	8%
Totals	11%	36,410,000		Totals	119,160,000	36%
GRAND TOTAL	35%	115,850,000		GRAND TOTAL	268,110,000	81%
* Percentages from 2021 SEMA U.S. Market Data						
** U.S. Population Estimate from https://www.census.gov/popclock/						
U.S. Population = 331,000,000						

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- BEA outdoor recreation statistics

**Chart 3. Conventional Outdoor Recreation Activities,
Current Dollar Value Added, 2021-2022**



References

- Cordell, H.K., C.J. Betz, G.T. Green, and B. Stephens. 2008. “Off-Highway Vehicle Recreation in the United States and its Regions and States: An update National Report from the National survey on Recreation and the Environment (NSRE).” Earlier version at https://www.srs.fs.usda.gov/pubs/ja/ja_cordell013.pdf
- U.S. Bureau of Economic Analysis (BEA), Outdoor Recreation Economy Statistics <https://www.bea.gov/news/2023/outdoor-recreation-satellite-account-us-and-states-2022>
- Specialty Equipment Manufacturers Association (SEMA) Market Data
- Capital Trail Vehicle Association, Trail Use Observations (1999–2024)
- President’s Make America Beautiful Again Commission, Executive Order (July 3, 2025) <https://www.whitehouse.gov/presidential-actions/2025/07/establishing-the-presidents-make-america-beautiful-again-commission/>
- Great American Outdoors Act, Indian Affairs (.gov) <https://www.whitehouse.gov/presidential-actions/2025/07/making-america-beautiful-again-by-improving-our-national-parks/>
- Additional public engagement and trail equity guidance https://www.americantrails.org/resources/trails-are-inclusive?blm_aid=1087976
- Trail use access issues <https://bber.umt.edu/pubs/survey/MontanaOHVStudy2013.pdf>
- <https://www.congress.gov/bill/118th-congress/house-bill/6492/text>

2. Reasonable Alternative for Motorized Access and Recreation for Youth

Introduction

Youth in the community require accessible motorized recreational opportunities, particularly those that are conveniently located near town. Ensuring these opportunities are available is vital for meeting the recreational needs of young people and supporting their overall well-being. The current Blue Mountains Forest Plan has impacted youth by reducing motorized access and motorized recreation opportunities.

Consideration of Alternatives

The Agency must thoroughly evaluate alternatives that would offer motorized recreation to youth, especially as a replacement for the closure of areas previously available close to town. This evaluation should ensure that any changes to access do not disproportionately limit the ability of young people to participate in motorized activities.

Health and Well-being of Youth

It is essential for the Agency to recognize and address the significant issue of youth suicide prevalent across western states. Providing youth with healthy activities, such as Off-Highway Vehicle (OHV) recreation, plays a critical role in supporting mental health and offering positive outlets.

Motorized Trail Riding Opportunities

Special attention should be given to the availability of motorized trail riding opportunities for youth. The Agency is encouraged to closely examine and prioritize options that maintain or enhance access to these activities, acknowledging their importance for young people in the region.

3. Reasonable Alternatives for Motorized Access for the Elderly, Handicapped, and Disabled

Introduction

It is essential for the Agency to recognize and address the specific needs of the elderly, handicapped, and disabled populations regarding motorized recreational opportunities. These groups often require accessible areas that are conveniently located near town to ensure their participation in outdoor activities. The current Blue Mountains Forest Plan has impacted the elderly, handicapped, and disabled including those that have served our country by reducing motorized access and motorized recreation opportunities.

Impact of Motorized Closures on Vulnerable Groups

The project area serves as an important recreational resource for the elderly, handicapped, disabled individuals, and veterans. Extensive use by these groups underscores the significance of maintaining motorized access. Motorized closures can have a substantial negative impact by limiting opportunities for recreation and social engagement for these individuals.

Need for Alternative Motorized Opportunities

When considering project plans, the Agency must explore alternatives that compensate for the closure of existing motorized opportunities close to town. These alternatives should be reasonable and tailored to the requirements of the elderly, disabled, and veterans, ensuring that motorized recreation remains accessible.

Consideration for Motorized Trail Riding

A thorough evaluation should be conducted to identify and implement motorized trail riding opportunities specifically designed for the disabled, elderly, and veterans. This "hard look" will help ensure that their recreational needs are met and that the Agency's decisions are inclusive and equitable.

4. Adequately Addressing the Impacts and Benefits of Motorized Recreation on the Human Environment

Introduction

It is essential for the Agency to give thorough consideration to the positive experiences needed by the human environment. Motorized recreation, including the use of existing networks of roads and trails, forms an integral part of our culture, pioneer heritage, and traditions, all of which depend on sufficient access to the land. Historic sites - such as mines, cabins, settlements, railroads, and access routes - used by pioneers, homesteaders, loggers, settlers, and miners are significant cultural resources for motorized recreationists and must be protected. The current Blue Mountains Forest Plan has minimized reasonable consideration of the needs of the human environment and should be revised to correct this significant deficiency.

Enjoyment and Rewards of Motorized Access and Recreation

- Opportunities for diverse recreational experiences
- Strengthening family relationships
- Experiencing and respecting the natural environment
- Participation in healthy, enjoyable sports
- Relief from pandemic stress
- Variety of experiences and challenges
- Camaraderie and sharing of experiences
- Trail building and maintenance for all users
- Observation of flora, fauna, and landscapes
- Adventure and achieving a sense of "flow"

Acknowledged Responsibilities of Motorized Visitors

- Respect and preserve the natural environment
- Respect all visitors
- Use vehicles properly and in designated areas
- Collaborate with land, resource, and recreation managers
- Promote responsible motorized vehicle use on public lands

Motorized recreation supports a wide range of visitor interests and is fundamental to multiple-use principles. This approach addresses the needs of most public land visitors, including those who use motorized routes for various activities such as family outings, mountain biking, camping, sightseeing, hiking, ranching, hunting, fishing, and firewood collection. These routes are also vital for the physically challenged, elderly, and veterans, providing access for recreational purposes beyond trail riding. Observations indicate that 98% of public land visitors participate in activities associated with motorized access.

Access and Opportunity

The anticipation of retirement for many members of the public is closely tied to the enjoyment of Off-Highway Vehicles (OHVs) in various locations. However, the closure of numerous recreational areas has negatively impacted these experiences, often due to inadequate consideration of the human environment by the Agency.

To facilitate compliance with current land use planning, user-friendly visitor maps in both paper and digital formats should be implemented. Examples of such maps can be found at <https://drive.google.com/file/d/1jMOc-Wrb5LR58qVj28lud-fvaY0QjCKH/view>.

Travel plan maps should also be made available in accessible formats, including PDF, KMZ, and GPX, as demonstrated at http://trails.dirtdevils.org/mw/index.php?title=National_Forests.

Trail Maintenance and Closures

Motorized recreationists have a long history of maintaining trails, routinely hauling tools and performing necessary work to keep routes open for all users. Previous closures of motorized routes have resulted in the loss of many cherished destinations, significantly impacting quality of life and the human environment. The scoping process should ensure that all significant issues related to the human environment, including the effects of motorized closures - are identified and evaluated appropriately. Over the past 40 years, motorized recreationists have been notably underserved, and closure of routes has had considerable impact on the public's access and recreation opportunities on public lands.

Local Opportunities and Economic Impact

There is a pressing need for OHV opportunities near population centers to provide adequate education and recreation for youth.

Many recreationists also prefer backcountry OHV experiences.

The economic loss resulting from reduced motorized access and recreation is significant, as outlined in the report at <https://extension.usu.edu/apec/files/OHVeconomicimpacts.pdf>.

Attractive recreational trails enhance quality of life and serve as valuable recruitment tools for businesses and agencies, as noted at https://headwaterseconomics.org/wp-content/uploads/Trail_Study_4-trail-use-in-minnesota.pdf.

Mapping and Public Information

Current mapping is inadequate, making it difficult for the public to determine route interconnections. The Agency should develop a comprehensive mapping platform that identifies all routes open to the public, regardless of management agency or land ownership, and details the uses permitted for each route.

This web-based tool should support GPS and PDF downloads, as well as posting of user photographs and reports to describe routes. Idaho Trails offers a useful starting point for review at <https://idaho.maps.arcgis.com/apps/webappviewer/index.html?id=ec451196747346558c999bc7cdf1a728>.

Impacts of Closures on the Human Environment

Each closure of a road, trail, or campsite results in substantial loss and negative impacts on the human environment. The Agency must acknowledge and value the impacts all past and proposed closures on motorized recreationists, ensuring their experiences are not diminished.

Pro-Recreation Alternatives

The Agency should consider alternatives that prevent a net loss of motorized recreation opportunities by creating new routes and connectors to offset closures. Lesser-used routes offer visitors a sense of exploration.

There is also a need for camping and motorized opportunities across different seasons and elevations, including early season lower elevation and late season sites.

Learner Loops near popular camping areas would provide safe spaces for OHV education and training, helping to reduce traffic within camping zones.

In times of increased public stress, motorized closures only intensify the burden.

A block management program similar to Montana's hunting block management could offer additional connections and opportunities for motorized routes.

Mapping and identification of singletrack routes suitable for various recreational uses should rely on ground inventory and user input, as aerial mapping is insufficient; requirements are outlined in the Off-Highway Vehicle Record of Decision and Plan Amendment for Montana, North Dakota, and parts of South Dakota (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd569502.pdf).

Camping and Dispersed Camping

Signs of human use at campgrounds and dispersed sites are reasonable for multiple-use lands.

The public's need for more dispersed camping opportunities is increasingly urgent, especially in the wake of social distancing requirements and the pandemic.

Public preference for dispersed camping aligns with the need for social distancing. The number of dispersed camping spots is inadequate and should be addressed in the preferred alternative. The pandemic has highlighted the essential nature of abundant dispersed camping sites and motorized trails for public health and well-being.

Each closure of a dispersed campsite results in loss and negative impacts, particularly for retirees, families, weekenders, boondockers, and nomads. All existing and new sites should be included to meet growing demand.

Reasonable evidence of public use on multiple-use land, including dispersed campsites, is acceptable. These sites are highly valued contemporary cultural locations. Adequate access to dispersed camping and motorized recreation is vital for a healthy human environment.

The public has been squeezed into small areas with limited routes, and closures due to federal agency actions and closure of public access during the pandemic have been particularly detrimental.

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Agency decisions regarding camping opportunities should be based on site-specific data and analysis, comparing impacts to naturally occurring levels.

The strategy of closing sites using resource management plans is misaligned with public need, and any significant negative environmental impacts are generally manageable.

Off-trail concerns are minimized due to increased deadfall.

RV campers dispose of waste responsibly. More dispersed camping sites for self-contained campers should be created to serve this popular form of recreation.

Traveling long distances to find diverse OHV and camping opportunities is unreasonable when multiple-use lands exist near population centers. The need for RV-friendly campgrounds, rehabilitated campgrounds, and increased dispersed camping capacity in the project area is clear. The Dyrty's 2022 Camping Report (<https://reports.thedyrt.com/2022-camping-report/>) found booking campgrounds is now three times harder than before the pandemic, with over eight million new campers but no increase in capacity. Extended camping seasons are important for retirees and weekenders.

Dispersed camping offers authenticity and fulfillment. Reservation-only sites are inconvenient for those with flexible schedules.

Safety considerations require at least a 300-foot setback from roads for camping and picnicking. Limiting dispersed camping to within 70 feet of a road poses safety risks, as evidenced by incidents involving pets and the potential for child accidents.

The Agency must evaluate cumulative impacts of closing dispersed campsites and rely on site-specific data to justify any closures. In general, environmental impacts from dispersed camping are insignificant compared to natural levels and can be mitigated. Self-contained campers have minimal impact, further supporting the need for more dispersed camping opportunities.

Human Environment and Mental Health Crisis

Recreation should be a top priority for public lands to support mental health and well-being. Management plans must recognize the diversity of human needs. The nation faces a mental health crisis, highlighted by events such as Sandy Hook, Buffalo, and Uvalde, and there is a need for more positive activities for all age groups. OHV recreation serves as a beneficial mental health activity, encouraging shared use of public lands and the creation of new opportunities.

The high suicide rate in Montana and surrounding states and the significant presence of veterans in national statistics emphasize the importance of access to motorized recreation.

Agency actions must balance population and resource use to maintain high standards of living and shared amenities, as required by NEPA. Adequate motorized access and recreation are essential for public health, and the Agency's tendency to reduce these opportunities conflicts with public needs.

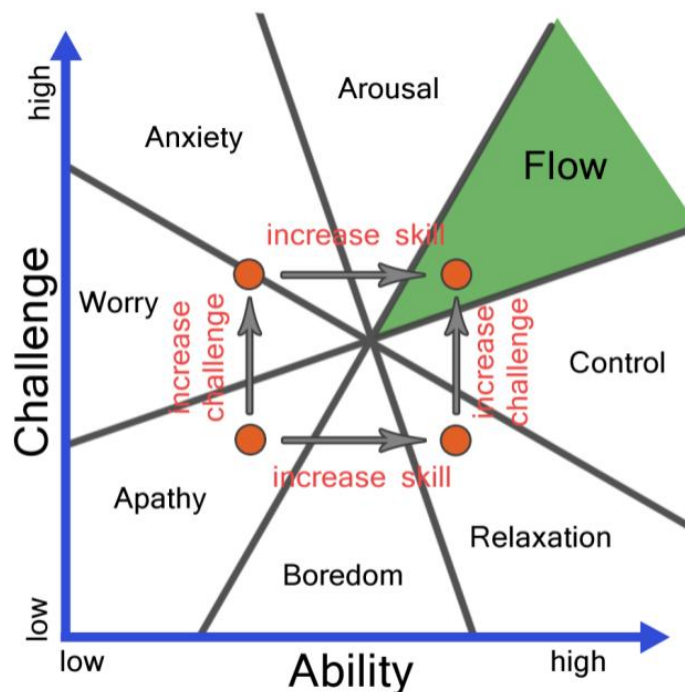
Robust access to recreation supports stress relief and mental health, with 97-98% of public land visitors relying on motorized access. E-bike enthusiasts are among those excluded from sharing trails, highlighting the need for inclusive management. NEPA mandates equal consideration for the human and natural environments, including social, economic, and health factors. The pandemic has demonstrated the urgent need for increased motorized access and recreation.

Excessive control over public land use can be detrimental, and alternatives maximizing recreation in proportion to visitor needs should be considered. The Agency's NEPA budget impacts the human environment through closures, and mitigation strategies should be developed.

Youth mental health needs are rising and require healthy recreational activities (https://helenair.com/news/state-and-regional/montana-youth-mental-health-needs-on-the-rise/article_c9ad3613-68b8-591d-91fc-5dae86b9b364.html).

Lack of positive recreation contributes to mental illness and suicide, and route closures exacerbate stress and health issues. Closing motorized routes erases valuable memories and opportunities for visitors.

The concept of "flow" is central to the value of motorized recreation. OHV riding provides relaxation and immersion, allowing participants to escape anxiety and boredom through engaging activity. This state of mind, described by psychologist Mihály Csíkszentmihályi, is achieved through skilled, enjoyable activities such as OHV riding, similar to artistic and athletic pursuits.



<https://www.verywellmind.com/what-is-flow-2794768>

<https://youtu.be/8h6lMYRoCZw>

<https://youtu.be/fXleFJCqsPs>

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Public Safety

The Agency must consider public safety implications of camping, picnicking, and other motorized activities near well-traveled roads and within limited miles of available routes.

Promoting safety programs similar to those at <https://nohvcc.org/nevada-outdoor-schools-ride-safe-ride-smart-program/> is also recommended.

5. Considerations for Wilderness and Multiple-Use Land Management

Introduction

Management of our public lands needs to be based on the needs of the public who actually visit and use the land. Under the current Blue Mountains Forest Plan motorized recreationists have lost many high-quality recreation opportunities that were enjoyed by motorized recreationists for generations while non-motorized recreationists gained nearly endless recreation opportunities of the highest quality. Revision of the current Blue Mountains Forest Plan should adequately consider this trend and incorporate a mitigation plan to address it.

Visitor Ratios and Management Priorities

When determining management strategies for public lands, it is essential to recognize that less than 3% of visits are for wilderness recreation, while the overwhelming majority - 97% - are for multiple-use purposes. Management decisions should reflect these ratios, ensuring that the needs of all visitors are met in an equitable manner.

Limitations of Wilderness Management

It is important to acknowledge that wilderness areas are not managed for beneficial use and health. Expanding defacto wilderness by restricting motorized access and recreation on lands designated for multiple-use compounds existing challenges and limits access for the majority of public land users.

Concerns Over Defacto Wilderness Creation

The current planning process may serve as a backdoor method for creating additional defacto wilderness areas. This is often achieved by closing motorized access and recreational opportunities on lands that Congress has designated for multiple-use, thus undermining the intent of those designations.

Acreage Allocation and Public Needs

A significant concern is that the acreage reserved for wilderness and wilderness study areas far exceeds the needs of the small percentage of visitors who utilize these spaces. Management decisions should take into account the actual sense of magnitude for public needs, ensuring an appropriate balance between wilderness and multiple-use land.

Evaluation and Decision-Making Criteria

Evaluations and decisions regarding land management should consider the ratio of acres per wilderness visitor (representing 3% of observed visits) compared to acres per motorized visitor (representing 97% of observed visits). This analysis should take place both before and after any proposed actions to ensure that management strategies are fair and proportionate to public use.

Respecting Congressional Designations

Finally, lands that Congress has designated for multiple-use purposes should not be managed according to wilderness standards. Instead, management practices should respect the intended use

and ensure that both wilderness and multiple-use areas are appropriately maintained to serve the distinct needs of their respective visitor groups.

6. Importance of Properly Considering Roadless Areas

Proper Evaluation of Roadless Areas

It is essential that the Agency thoroughly evaluates any actions affecting roadless areas. Special attention must be given to lands that Congress has designated for multiple-use purposes. Any conversion of these areas into de facto wilderness lands, without adhering to the established congressional process for wilderness designation, undermines existing laws governing land use.

Respecting Congressional Intent

Converting multiple-use lands to de facto wilderness circumvents the legislative intent and processes set by Congress. Therefore, the Agency must ensure that its actions align with congressional laws related to multiple use and the official wilderness designation process, maintaining transparency and fidelity to the law.

Combined Impacts of the Roadless Rule and 2005 Travel Management Rule

The 2001 Roadless Rule and 2005 Travel Management Rule have been used to create de facto wilderness areas on lands Congress designated for multiple use under the Multiple Use–Sustained Yield Act of 1960. This misuse of both rules should be corrected by reversing management decisions that created de facto wilderness areas that circumvented congress and the Multiple Use Act.

7. Adequately Consider and Disclose the Cumulative Impact of All Motorized Closures

Historic Reduction in Motorized Access

Over the past 20 years, numerous land management decisions including many made under the 2001 Roadless Rule, 2005 Travel Management Rule, and current Blue Mountains Forest Plan have led to a significant reduction in motorized access and recreational opportunities. The Agency has undertaken an aggressive approach to closing motorized routes, which has resulted in substantial cumulative impacts affecting motorized recreationists. The following table, while partial, highlights a series of motorized closures and demonstrates the existence of significant issues associated with the cumulative effect of all motorized closures.

As part of the revision of the current Blue Mountains Forest Plan, the Agency should prepare a comprehensive evaluation, including all planning actions that have impacted motorized access and recreation and implementation of an adequate mitigation plan.

Table of Cumulative Effects on Motorized Recreationists								
Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Iron Mask, Butte BLM	26,235	19.3	0.6	18.7	96.89%	No	BLM	2015
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000						FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000						FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000						FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700						FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Butte RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009
Helena area		52.2	9.8	42.5	81.42%	No		
Blackfoot TP	376,000	***	*	*	over 50%	No	FS	2017
Divide TP	155,000	***	*	*	over 50%	No	FS	2016
Custer NF Beartooth TP	580,000						FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP and Forest Plan	437,000	**	??	??	??	No	FS	Ongoing
Custer NF Sioux TP and Forest Plan	436,000	**	??	??	??	No	FS	Ongoing
Bitterroot NF TP	1,589,000	**	*	*	over 75%	No	FS	2015
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000						FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000						FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000						FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**	**	**	**	No	FS	Ongoing
Lolo Forest Plan	2,083,000	**	**	**	**	No	FS	Ongoing
WMPZ Forest Plan	6,043,000	**	**	**	**	No	FS	Ongoing
Subtotal	50,494,925	39,413.3	28,343.3	11,068.7	28.08%	No		
Other Significant Measures of Closed Motorized Opportunities								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
All completed, ongoing and reasonably foreseeable FS Travel Plans	192,300,000	192,300,000	??	??	??	No	FS	
All completed, ongoing and reasonably foreseeable BLM RMP and Travel Plans	258,000,000	258,000,000	??	??	??	No	BLM	
Notes:								
* estimated impact, Inadequate public disclosure by a public agency, public does not have access to the overall data								
** underway with expected significant impact								
*** additional impact associated with significant loss of quality trails and substitution with roads								
**** number of snow machines								
***** All motorized trails closed								
Needs to be identified and tabulated and disclosed by the agencies per NEPA disclosure requirements, ?? actual cumulative effect of all closures is greater than 11,068 miles and 28.08% when full disclosure is made.								

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Significant Cumulative Impact from Past and Foreseeable Actions

Past actions, as indicated in the table above, have had a considerable impact on motorized recreation in Montana. Additional impacts are anticipated from reasonably foreseeable actions such as travel plans, forest plans, land management plans, and resource management plans. These actions, both past and future, contribute to a significant cumulative impact on motorized recreational opportunities in the project area and its surroundings. According to NEPA and MEPA guidance, this issue merits thorough consideration.

Extent of Road Closures in Montana

Information from the Montana Environmental Quality Council (EQC) supports that road closures on U.S. Forest Service (USFS) land in Montana total approximately 21,951 miles when including decommissioned and “unauthorized” roads. A 2015 study reported to the EQC found that 9,784 miles, or nearly 31 percent of the 32,000 miles of USFS-managed roads, are “level 1 roads” closed to motorized traffic except for administrative purposes (<https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf>).

When counting 5,796 miles of decommissioned roads and an estimated 6,191 miles of unauthorized roads, the total approaches 44,000 miles, with 21,951 miles closed on USFS land. Currently, only 22,047 miles remain open to motorized traffic, meaning half of the USFS road mileage is closed. Our observations and experience suggest a similar percentage of motorized trails and BLM-managed roads have also been closed.

Note that the BLM rarely identifies and discloses motorized trails, further reducing available opportunities.

The public has expressed opposition to additional motorized closures and insists that cumulative effects of past closures be thoroughly considered and mitigated. The cumulative effect of all motorized closures is substantial and cannot be ignored.

Current and Recent Actions Impacting Motorized Recreation

The Agency must consider closures enacted by both the BLM and Forest Service in neighboring regions and states, where at least one-third of routes available in 1990 have been closed. Evaluation and disclosure of these trends is essential, including the impact of closures on public land health and public health, and recognizing the significant need for motorized access and recreation.

The health of the human environment deserves equal consideration to the natural environment, as neither NEPA nor CEQ guidance prioritizes one over the other. Excessive closure of multiple-use land to motorized access has created significant cumulative impacts on the human environment, with recreationists experiencing repeated motorized closures in Montana and surrounding states. Planning actions since the 1960s have closed 25 to 75 percent of historic motorized routes and eliminated cross-country opportunities. Analysis should disclose and evaluate the extent of lost motorized access and recreation since the 1960s and mitigate the negative cumulative effects, particularly for youth, disabled, elderly, and veterans.

Motorized recreationists frequently report being confined to areas too small to meet their needs, with insufficient motorized routes and campsites. The cumulative impact of these decisions affects

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the pursuit of happiness and the quality of the human environment. There is concern that continual closure of motorized access demonstrates intent to eliminate such opportunities without proper disclosure. Since 1985, motorized closures meet the NEPA and CEQ test for significance regarding cumulative effects, and analysis must reflect this magnitude.

Conversion of Multiple-Use Land and Impact on Public Opportunities

A significant amount of land originally used for multiple purposes has been effectively converted to defacto wilderness or limited/exclusive-use land. The Agency has routinely closed dispersed campsites, spur routes, and motorized roads and trails without adequately evaluating the cumulative impact on the human environment. Defacto motorized closures resulting from vegetation and timber projects, erosion and flood damage, beetle kill downfall, and wildfires have also limited public enjoyment of motorized recreation.

These continual losses have become significant and must be addressed and mitigated.

Disclosure and Evaluation Requirements

The Agency must provide comprehensive disclosure of the cumulative effects of all motorized closures to avoid marginalizing motorized recreational opportunities. Past actions have converted large areas of multiple-use land to limited-use, often benefitting a minority of visitors seeking exclusive use. Multiple-use opportunities are now confined to unreasonably limited areas, further compounded by the refusal of some user groups to share with motorized recreationists.

Inadequate consideration and disclosure of cumulative effects have persisted, with motorized recreationists subjected to repeated closures over the past 20 years. Each travel management action closes 25 to 50 percent of existing motorized opportunities, and within a few decisions, most original access is lost.

The cumulative effect of closures of roads, trails, and dispersed campsites has not been adequately disclosed, considered, or mitigated as required. The Agency should provide adequate disclosure of cumulative effects, including:

- Planning area-wide basis
- Adjoining forest and BLM lands basis
- Forest Service Regional basis
- BLM lands regional basis
-

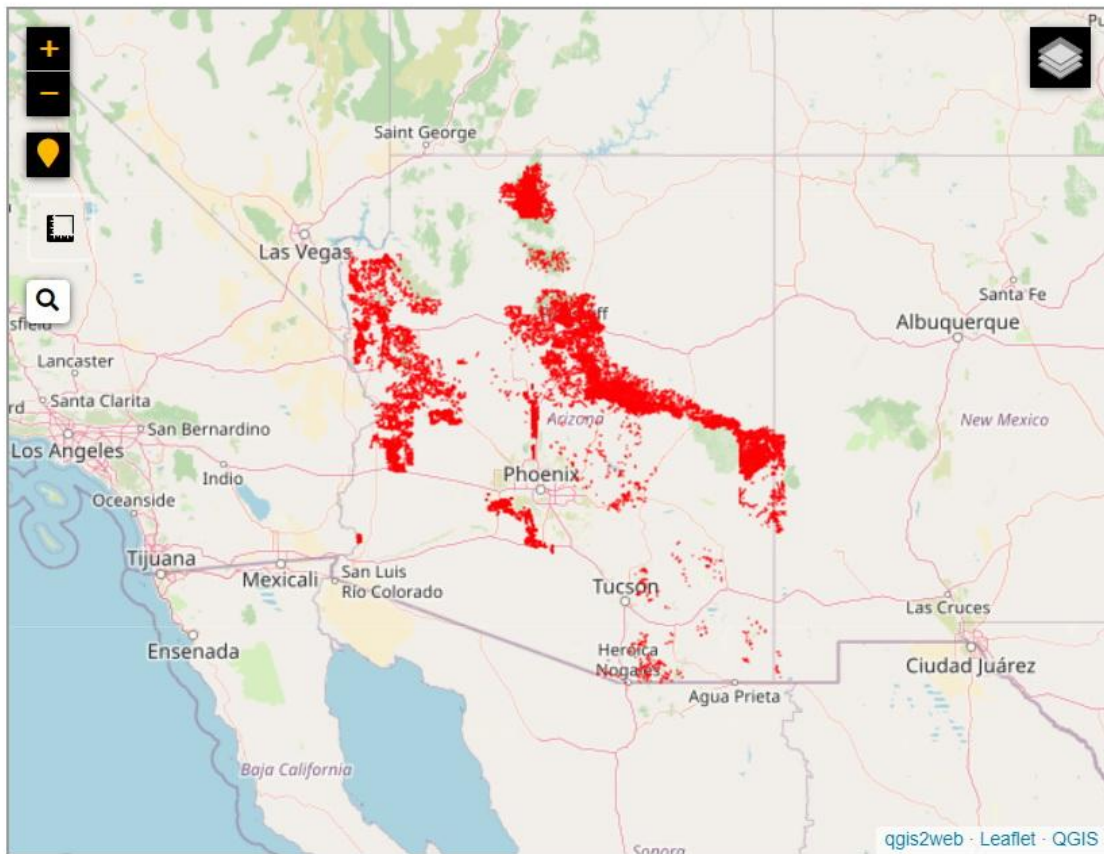
Such comprehensive disclosure would highlight the significant cumulative impact resulting from management decisions.

Analysis of Conversion Trends and Mapping

The Agency should analyze how the ongoing conversion of multiple-use land to defacto wilderness affects the public, comparing motorized opportunities available before BLM and USFS planning guidance in the 2000s to current and proposed levels. Historical mapping resources, including agency maps, RS 2477 maps, GLO maps, County Maps, Benchmark, Delorme, and USGS quadrangles, should be used to assess lost routes and opportunities. Background on the history of Forest Service mapping can be found at <https://forestservicemuseum.org/wp-content/uploads/2019/11/Mapping-the-National-Forests-Nov19.pdf>.

Under the combination of the Roadless Rule and 2005 Travel Management Rule, massive motorized closures have resulted from every forest plan, resource management plan, travel management plan and other planning activities. Planning activities during the past 25 years have drastically reduced OHV opportunities, causing remaining destinations to become overcrowded. The long-term trend of excessive closures is detrimental to both the human and natural environments.

The following is an adequate example of a map that adequately discloses the cumulative effect of all motorized closures in Arizona ([Arizona BLM and USFS Road Closures Map](#)).



This map was developed by Arizona Backcountry Explorers using road data from the Bureau of Land Management and the U.S. Forest Service.

Private Land Conversion and Data Availability

The conversion of private lands, such as those previously owned by Plum Creek timber company, to conservation group ownership has resulted in loss of public and motorized access and recreation. The analysis should include cumulative effects, with maps similar to those produced by Arizona Backroads, showing motorized road and trail closures on Bureau of Land Management and National

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Forest lands in Arizona. However, incomplete public data and unavailable travel management plans have prevented full disclosure of the extent of closures.

Federal and state agencies are working on additional travel management plans, and the real number of closed roads is much higher than depicted. Over 18,000 miles of closed roads are missing from existing maps due to data gaps or pending management plans.

Mitigation and Engagement

The Agency should mitigate the impact on OHV recreationists resulting from 50 years of inadequate engagement. The cumulative effect of converting multiple-use public land to non-multiple-use or wilderness is substantial and must be considered for all related proposals and decisions.

Significant numbers of motorized routes have also been lost due to destruction from wildfires, beetle-kill downfall, erosion, lack of maintenance, and other causes. Accurate assessment of these cumulative losses is required as part of the analysis, and the proposed action must include a mitigation plan to compensate for these significant impacts.

8. Fairly Consider Equal Opportunity, Benefits, and Need for Trails

Introduction

Public lands - including State Parks, National Forests, Bureau of Land Management (BLM) lands, and National Park Service (NPS) areas - play a critical role in providing recreational opportunities for both motorized and non-motorized users. However, there exists a significant imbalance in the availability of motorized trail opportunities compared to non-motorized trail opportunities in the overall big picture of public lands.

Current Imbalance in Trail Development

In the past 20 years, the Agency developed numerous long-distance non-motorized trail systems, such as the Continental Divide National Scenic Trail (CDNST), the Pacific Crest Trail (PCT) and Maah Daah Hey Trail. However, it has not taken similar steps to create long-distance trail systems designed specifically for motorized recreationists. This discrepancy has resulted in an unequal distribution of recreational opportunities, leaving motorized users with limited options compared to their non-motorized counterparts. Revision of the current Blue Mountains Forest Plan is an opportunity to correct this deficiency.

Potential Use and Benefits of Motorized Trail Systems

Long-distance motorized trail systems have the potential to attract substantially higher usage than non-motorized trails. These trails would not only provide extensive recreational opportunities for motorized users but also deliver significant benefits to the human environment. Such benefits include enhanced therapeutic recreation options and substantial economic advantages for local communities.

Need for Equal Opportunity and Consideration

It is essential for the Agency to give proper consideration to the creation of Off-Highway Vehicle (OHV) backcountry discovery routes, OHV byways, and other long-distance trails tailored for motorized recreation. By doing so, the Agency would ensure that opportunities for motorized recreationists are on par with those available to non-motorized users.

Concerns Regarding Trail Closures

Recent closures of motorized sections of the CDNST have raised concerns that they were implemented without adequate consideration of the requirements outlined in the National Trails System Act (16 U.S.C. 1241), which serves as the enabling law for the CDNST. Additionally, these closures may not have taken into account the CDNST Environmental Impact Statement (EIS) and Record of Decision (ROD) dated April 7, 1989, nor the policy memoranda issued by the Deputy Forester on July 3, 1997, and February 1, 2006. Addressing these concerns and taking corrective action for any illegal closures should be a priority in future decision-making processes.

Economic and Community Benefits of Motorized Trails

Many regions are actively seeking new outdoor recreation opportunities to diversify their economies and stimulate tourism. Establishing Backcountry Discovery Routes can attract thousands of riders annually to rural communities, where they contribute to the local economy by purchasing

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food, fuel, lodging, and supplies. The Backcountry Discovery Routes organization is committed to developing adventure riding opportunities nationwide, generating positive economic impacts for businesses located along these routes.

A 2022 survey conducted by Backcountry Discovery Routes revealed that the total economic impact from all existing routes reached \$60 million that year. Additionally, visitor spending associated with these routes supports nearly 500 jobs annually, further demonstrating the value of motorized trail systems in sustaining local workforces and strengthening small communities.

Infinite Non-Motorized Opportunities

With unrestricted cross-country access, non-motorized recreationists enjoy virtually limitless opportunities for exploration. The extent of available non-motorized trails, coupled with open cross-country travel in wilderness and de facto wilderness areas, ensures that non-motorized users have access to a vast and diverse array of experiences.

Comparison of Trail Opportunities

It is important for the Agency to consider and compare the miles of non-motorized trails and cross-country routes with those designated for motorized use. This comparison should include factors such as the quality of experience, associated costs and conditions, and the total number of users. Every action taken by the Agency often results in the creation of additional non-motorized trail and cross-country opportunities, further increasing the disparity.

Current State of Opportunities

Non-motorized recreationists benefit from hundreds of potential opportunities within the project area. These include the ability to travel cross-country to virtually any desired location. In contrast, motorized recreationists are restricted to a relatively small system of designated routes, limiting their access and experiences.

Evidence of Imbalance

Summary statistics from Trailforks illustrate the existing imbalance in trail opportunities, showing a considerable advantage for non-motorized recreationists. This data highlights the need for all federal and state agencies to work together and adequately identify and address the disparity in motorized trail opportunities (<https://www.trailforks.com/trails/all/>).

Location

Riding Area

All

go

Trail Activity

☒ All

☐ Multi-Use Primary (178,354)

☐ Mountain Bike (420,620)

☐ Snowshoe (41,273)

☐ Downhill Ski (19,637)

☐ Backcountry Ski (10,238)

☐ Nordic Ski (32,315)

☐ Observed Trials (2,537)

☐ Snowmobile (5,880)

☐ E-Bike (214,284)

☐ Trail Running (434,567)

☐ Hike (442,034)

☐ Dirtbike/Moto (17,489)

☐ ATV/ORV/OHV (6,769)

☐ Horse (45,319)

9. Ensuring Reasonable Motorized Multiple Use of Public Lands

Introduction

The responsible management of public lands is a fundamental directive established by Congress, with a clear emphasis on multiple-use principles. This approach is intended to provide for diverse activities and interests, including motorized access and recreation, which are the predominant uses within many project areas. It is imperative that the Agency recognize and uphold these congressional directives, ensuring that lands designated for multiple-use are not managed under restrictive wilderness standards.

Recognition of Motorized Access and Motorized Multiple-Use Designation

The Agency must acknowledge that motorized access and recreation are the primary uses in the project area. Congressional designation of these lands for multiple-use means that management should facilitate a variety of activities, not exclusively wilderness preservation. Signs of human use - such as roads, trails, campgrounds, and dispersed campsites - are reasonable and expected features of motorized multiple-use lands.

Principle of Shared Use

The expectation for all multiple-use lands is sharing among diverse user groups; otherwise, these lands risk becoming exclusive-use areas. Management actions should not illegally convert lands designated for multiple-use into de facto wilderness areas. Existing routes, mines, historic and current uses, and the broader public interest all indicate that proposed non-motorized areas do not qualify as wilderness and should not be managed as such.

Congressional Intent and Legal Compliance

Congress recognized that multiple-use management best serves the public and provided clear direction in multiple-use laws. It is not legal or reasonable to apply wilderness standards to lands designated for multiple-use. Multiple-use lands should be managed for the greatest public good and not manipulated for the exclusive benefit of select groups.

Restoring Equality and Broad Access

Equality should be restored to public lands by reestablishing broad multiple-use management. Public lands are owned by all citizens and should be managed to benefit everyone, not just those seeking exclusive use. Rewarding exclusive-use demands undermines the principle of shared benefit and contradicts congressional intent. Management should support a wide spectrum of uses and not convert multiple-use lands to de facto wilderness through policy or planning actions.

Beneficial Use and Public Needs

Visible use of public lands for the public good is both acceptable and reasonable. Beneficial use should be the foremost objective for all multiple-use lands, including supporting employment and diverse recreational opportunities. Developing and implementing robust multiple-use alternatives would better serve the overarching needs of the public than marginalized or restrictive alternatives.

Acreage and Access Considerations

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Analysis should consider the ratio of acres per wilderness/non-motorized visitor versus acres per multiple-use visitor, both before and after proposed actions. The Agency should seek alternatives that maintain a reasonable level of multiple-use and enhance motorized access and recreation opportunities.

Sharing Responsibilities and Justice Issues

All users have a responsibility to share public resources, especially on lands designated for multiple-use. Off-highway vehicle (OHV) recreationists are willing to share opportunities with others, yet they are not rewarded for this willingness, while non-sharing behaviors are incentivized. Sharing of public resources provides a better solution than segregation of user groups, which has not been sufficiently considered. Motorized recreationists consistently lose opportunities in planning actions, raising significant justice concerns.

Public Participation and Influence

Citizens should have the ability to recreate on public lands without needing to join well-funded advocacy organizations. Agency actions have resulted in the conversion of land intended for multiple-use to exclusive-use for a limited number of users, contrary to congressional directives.

Legal Nonconformance and Cumulative Losses

The proposed action does not conform to congressional laws and presidential orders directing the Agency to manage the project area for multiple uses, including recreation and motorized recreation.

Additionally, there has been a substantial cumulative loss of motorized use due to wildfire, beetle-kill downfall, erosion, and lack of maintenance, all contributing to the creation of more de facto wilderness on multiple-use lands.

Current Public Land Restrictions

Currently, approximately 60% of public lands are highly restrictive, if not prohibitive, to public recreation. The breakdown by land use designation includes:

- Wildlife Refuge: ~147 million acres
- Wilderness: ~112 million acres
- National Parks & Monuments: ~81 million acres
- Inventoried Roadless Areas: ~59 million acres
- Areas of Critical Environmental Concern: ~15 million acres
- Lands with Wilderness Characteristics: ~13 million acres
- Wilderness Study Areas: ~12.5 million acres
- Conservation Areas: ~3.9 million acres
- Wild & Scenic Rivers: ~2.5 million acres

Current land management trends have resulted in conservation becoming the dominant use of public lands at the unnecessary cost of much needed public recreation opportunities.

Regulatory Constraints on Multiple-Use Lands

Additionally, the remaining 40% of Bureau of Land Management (BLM) and U.S. Forest Service (USFS) lands available for multiple-use are heavily regulated by numerous conservation-focused laws that also reduce public recreation opportunities, including:

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- National Environmental Policy Act
- Clean Air Act
- Clean Water Act
- Antiquities Act
- Endangered Species Act
- Migratory Bird Treaty Act
- Wilderness Act
- Wild and Scenic Rivers Act
- Wild and Free-Roaming Horses and Burros Act
- Agency-specific organic acts
- Roadless Rule
- Travel Management Rule
- Various omnibus land packages

Congressional Directive: FLPMA

The 1976 Federal Land Policy and Management Act (FLPMA) directs the Agency to manage public lands to protect scientific, scenic, historical, ecological, environmental, air, water, and archaeological values, while preserving certain lands in their natural condition where appropriate.

10. Considerations Regarding Climate Change and Motorized Recreation Management

Introduction

Revision of the current Blue Mountains Forest Plan should be structured to allow the Agency to provide better management of the forest and reduce the destruction to the forest and climate that wildfires have had. It should also adequately address the impact wildfires have on the human environment.

This section provides a comprehensive overview of the factors the Agency should consider when evaluating the relationship between climate change, motorized access, and motorized recreation. The content is structured to address the impact of motorized recreation, the significant role of wildfires, the nature of climate cycles, scientific considerations, and management recommendations.

Wildfires: Significant Contributors to Greenhouse Gases

Wildfires emit large amounts of greenhouse gases such as carbon dioxide (CO₂) and methane (CH₄), as well as particulate matter (PM_{2.5}), smoke, carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), and hazardous air pollutants (HAPs) including polycyclic aromatic hydrocarbons (PAHs). These emissions negatively impact air quality, contribute to climate change, and can transform in the atmosphere to produce secondary pollutants like ground-level ozone and haze. Consequently, the Agency should acknowledge its responsibility for wildfire smoke and its significant environmental impact. The Agency should take active measures to control wildfires. Motorized roads and trails greatly improve wildfire fighting efforts and firefighter safety and revised Travel Management Rule should be used to maximize control of wildfires and improve air quality and the environment and protect all human lives and property.

Understanding Climate Cycles

Climate change is more accurately described as a climate cycle that has occurred naturally over the course of Earth's history. The climate is continuously changing, and notable events such as the last ice age - approximately 12,000 years ago - are minor in terms of geologic time. Over the past 12,000 years, climate changes have reduced pine forests in regions such as Utah and Nevada, led to fluctuations in the Great Salt Lake, and have begun to impact forests in Idaho's central mountains. The southern boundaries of western forests have gradually moved northward since the end of the last ice age.

Scientific Considerations and Data Limitations

The issue of climate change often lacks sufficient and impartial scientific grounding. Confirmation bias can influence climate science outcomes, where researchers may find what they expect to see. Weather records spanning 100 years are insufficient to identify long-term climate trends, and conclusions based on such limited data may be flawed. Reliance on average or median climate statistics can mislead the public by masking natural variability in rainfall, temperature, and streamflow; instead, the Agency should present comprehensive data sets showcasing natural extremes.

Paleoclimatology demonstrates that the Earth is still in a warming cycle following the last ice age, and humans were not responsible for initiating these cycles. Additionally, the misconception that climate should remain "normal" year to year, or that humans can control the climate, should be addressed. The Agency should avoid analyzing climate using short-term data snapshots and should consider long-term paleo trends such as those found in tree ring reconstructions of streamflow in the Upper Missouri River.

Magnitude and Natural Changes in Earth's Climate

Throughout human existence, the climate has been unpredictable and constantly changing. A sense of magnitude is necessary to properly identify natural changes on Earth. For example, 14,000 years ago, the project area was covered by ice and uninhabitable, and the climate has gradually warmed and dried since then. Thermodynamic principles indicate that the total heat energy (enthalpy) of Earth has always increased. The Agency should also recognize that factors such as solar output and changes in Earth's magnetic field play significant roles in climate change, independent of CO2 emissions.

Wildfires and Policy Implications

The "Let-It-Burn" policy and uncontrolled wildfires contribute significantly to the current state of climate change due to the massive release of CO2 and other pollutants. The Agency should evaluate a plan that minimize burning - including both wildfires and prescribed burns - because of the substantial release of greenhouse gases and their purported impact on the climate.

A fire study by the BlueRibbon Coalition found that roadless and wilderness wildfires escape up to four times more often and grow up to four larger. <https://blueribboncoalition.org/roadless-areas-burn-bigger/>

Broader Environmental and Policy Considerations

Restricting recreational activities in the United States as a measure to address pollution generated outside the U.S., such as in China, is not reasonable and does not mitigate foreign pollution. The carbon cycle has been ongoing for billions of years, and the most feasible approach is to explore ways to store carbon, similar to processes that occurred during the Carboniferous age. Additionally, a drier climate with fewer trees and vegetation further increases CO2 levels, as does the mandated reduction of particulates in diesel fuels used in agriculture and shipping. Over time, a warmer climate may lead to increased precipitation, which promotes vegetation growth and enhances the utilization of atmospheric carbon dioxide.

Motorized Recreation and Climate Change

The Agency should recognize that motorized recreation is not a significant contributor to climate change. Using climate change as a reason to eliminate motorized access and recreational opportunities is unreasonable.

Motorized Recreation Management Recommendations

Given the shifting climate conditions, the Agency should reconsider all existing motorized opening and closing dates, as climate change now allows for a broader range of dates. The Agency should

reasonably ensure that climate change is not used as a pretext to control personal freedoms or unnecessarily restrict motorized recreational opportunities for U.S. citizens.

11. Avoid Arbitrary and Capricious Analysis and Decision-Making

Overview

This section outlines the essential principles for ensuring that Agency analysis and decision-making processes are grounded in reasonable, site-specific scientific data rather than arbitrary assumptions or political agendas. The following sections detail reasonable expectations for data collection, evaluation, and monitoring, emphasizing the importance of a sense of magnitude and unbiased review in all decisions regarding motorized access and recreation. This sort of guidance should be included in the revision of the current Blue Mountains Forest Plan.

Commitment to Scientific Data and Open Evaluation

The Agency must thoroughly analyze all purported impacts using adequate and reasonable scientific data. It is important to recognize that the environment is dynamic, and expectations of stasis are unfounded. Scientific analysis should be conducted with an open mind, considering all possible causes and effects through relevant data.

Decision-Making Based on Public Needs and Accurate Data

Agency decisions should reflect the public's needs and interests, not political agendas. This requires accurate data and comprehensive evaluation of the entire spectrum of issues, ensuring that all significant causes and effects are properly identified and assessed.

Site-Specific Data Versus Unsupported Opinions

Many opinions against motorized access and recreation lack site-specific data and are not substantiated by analysis, even if frequently repeated. The Agency should monitor decisions carefully, eliminating those based on beliefs rather than verified, site-specific data. Repetition does not substitute for factual analysis. For instance, there is no site-specific evidence of negative impacts on wildlife from OHV trails; some studies, such as the Swan Valley grizzly bear study, indicate wildlife benefits from motorized routes, which can facilitate movement through otherwise impassable areas.

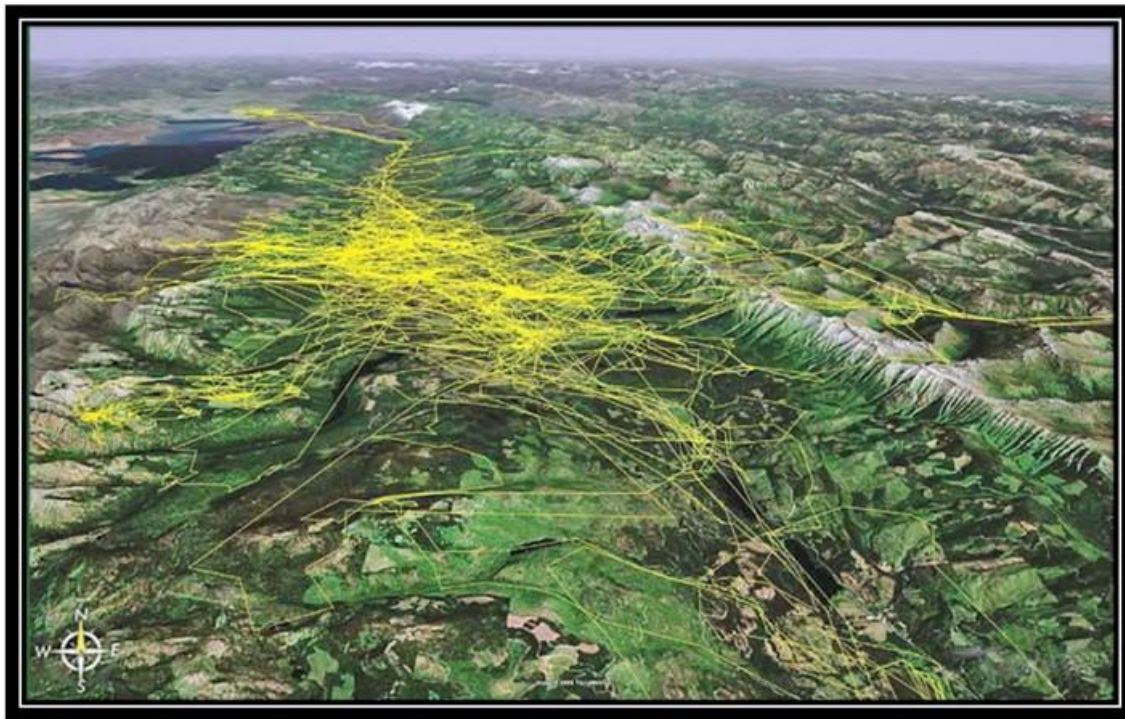
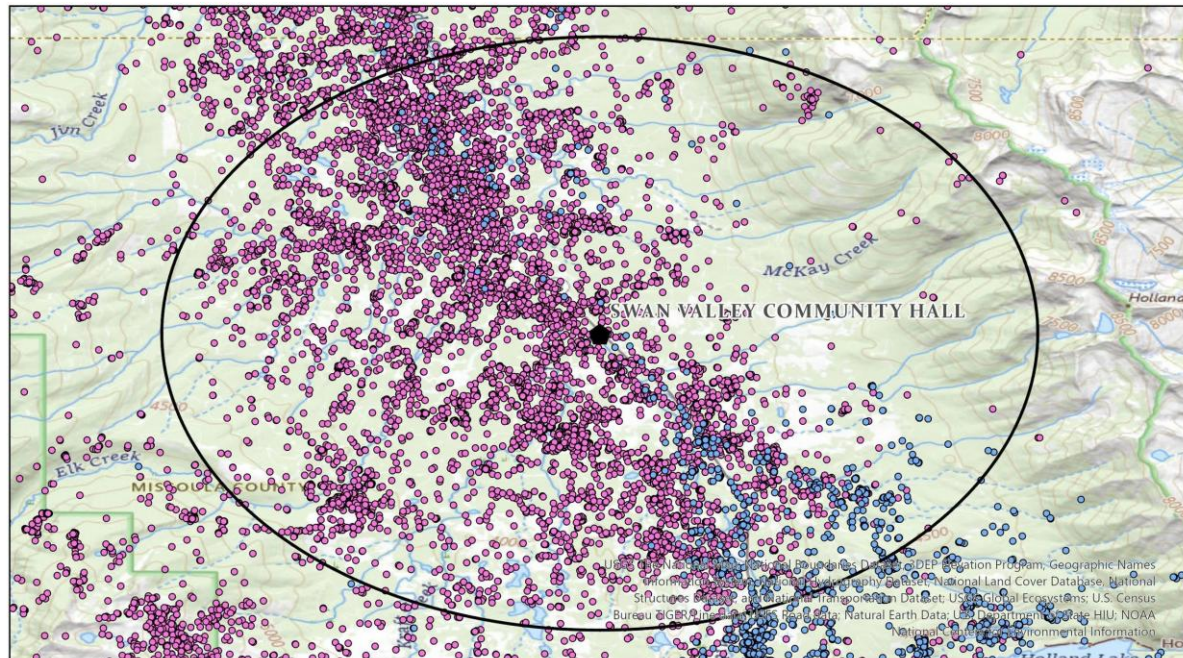


Figure 1. Grizzly bear movements based upon GPS collar telemetry studies conducted by Waller (2005) in the Swan Valley of northwest Montana (from a July 19, 2005 presentation by USFWS Grizzly Bear Recovery Coordinator Chris Servheen in Kalispell, MT).



https://images.squarespace-cdn.com/content/v1/645cee871926be5e8dd31223/99daf018-01e6-46f6-a708-9e2643ba6c02/Swan_Valley_Community_Hall_FWP.jpg?format=2500w

Developing and Using Site-Specific Data

For assessments of both negative and positive impacts on the natural environment, the Agency should:

- Collect and monitor site-specific data for each route.
- Develop positive and negative impact evaluations for each route.
- Determine significance by comparing impacts with naturally occurring levels for each route.

Impact analyses, especially regarding fish and wildlife, should not be based on assumptions but on site-specific studies and data. Only data demonstrating significant impacts from motorized use and camping should inform decisions. Non-site-specific criteria, such as road density impact measures, are not valid for project areas. Evidence from Yellowstone National Park's six-year snowmobile monitoring program reveals minimal impact on wildlife, underscoring the need for robust, site-specific data.

Human Environment Impact Assessment

Current visitor use monitoring does not accurately capture motorized recreationist numbers and types, highlighting the need for improved data collection.

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For human environment impacts, the Agency should:

- Conduct interviews with motorized recreationists about their needs and route preferences.
- Document motivations for route enjoyment.
- Develop a Need Factor for each route by user category, based on observed numbers during reasonable monitoring periods.
- Base route availability on Need Factors (e.g., 90 motorized visitors and 10 non-motorized users over four weekends yields a Need Factor of 0.90 for motorized users).

Additional considerations include whether a route is part of a network or destination, its history (including pioneer and mining use), route quality, alternatives for sharing, maintenance responsibility, and site-specific data for claimed negative impacts, including e-bike recreation.

Motorized recreation and camping opportunities should not be closed without site-specific data and analysis, as required by NEPA, CEQ guidance, and the 3-States OHV ROD. Benefits to the human environment, such as “flow” from route use, must also be considered.

Monitoring and Verification Processes

The Agency should ensure that evaluations and decisions are based on verified site-specific data, not beliefs. Evaluations should employ a sense of magnitude, comparing naturally occurring impacts to those of human use, so decisions are neither arbitrary nor capricious.

Purported negative impacts, including those from e-bikes, must be supported by adequate studies and compared to natural levels.

Recreation teams should visit project areas on weekends to gather site-specific information about motorized recreationists, their numbers, activities, and needs. This data should support decisions and records regarding motorized recreational opportunities. Opinions against motorized recreation lacking site-specific data should not be accepted.

Review and Reconsideration of Closures

Any motorized closures enacted without sufficient site-specific data and analysis should be revisited. The Agency must recognize that public access and recreation are being lost for reasons that may not be significant when judged with a reasonable sense of magnitude.

Applying a Sense of Magnitude

Managing wilderness versus multiple-use lands requires a sense of magnitude regarding public needs. The cumulative impacts on motorized recreationists over the past 40 years are significant and must be properly identified. Natural changes in the earth and climate, as well as foreign influences, should be assessed using an adequate sense of magnitude based on scientific analysis and site-specific data.

Evaluations and decisions should compare potential impacts to the naturally occurring range, preventing overstatement of impacts and arbitrary or capricious conclusions. All user group impacts must be compared to natural levels to demonstrate a true sense of magnitude.

A reasonable sense of magnitude should guide decisions, ensuring that minor improvements in natural resources do not cause significant losses in human resources. Vegetation management

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actions other than burning can reduce wildfire damage and CO2 release, resulting in less environmental harm. Impacts from motorized recreationists that are less than natural levels should not be classified as significant.

Ensuring Unbiased Analysis

Theories lacking impartial data and studies should not justify closure of motorized opportunities. Studies supporting or providing unbiased analysis of OHV recreation must be considered. The Agency should recognize and reject issues based on anti-motorized bias that may wrongly justify closure of valuable access and recreation.

Assigning equal impacts to different trail types (single-track motorcycle/e-bike, ATV, gravel roads, highways) using road density criteria is flawed and should be discontinued. Activities other than OHV recreation often have greater wildlife impacts. Exaggeration or repetition of untruths about motorized recreation's negative effects constitutes arbitrary and capricious decision-making.

The Agency should develop site-specific Need Factors for each route to reliably inform decisions about non-motorized versus motorized opportunities. The project team should represent all recreationists equitably, avoiding bias from personal recreation preferences.

Conclusion

It is unreasonable to expect avoidance of time and change. The Agency must base all analysis and decision-making on accurate, site-specific scientific data, a reasonable sense of magnitude, and an unbiased approach to ensure fair and effective management of motorized access and recreation opportunities. The revision of the current Blue Mountains Forest Plan should be structured to provide the opportunity for the Agency to improve its analyses and decision-making for the good of all sectors of the public.

12. Decision-Making at a Local Level

A key lesson from the current Blue Mountains Forest Plan is that decisions about public land should be made locally rather than through a national, one-size-fits-all approach. Local decision-making better supports balanced multiple use, improves access for fire and insect management, and respects regional needs and regional cultures.

For example, Clearwater National Forest supervisors supported historic snowmobile access in recommended wilderness areas in two recent forest plans, but those decisions were overridden at the Washington, D.C., level. The proposed rule change should help prevent that kind of interference.

13. Adequate Consideration of NEPA and Environmental Justice Issues

Introduction

It is essential for the Agency to listen to the needs of all sectors of the public and ensure that actions are taken equitably. Specifically, the Agency must address justice concerns, especially regarding the closure of motorized recreational opportunities made without robust scientific data or proper analysis, and without adequate consideration of impacts and changes to both the natural and human environments. Both the 2001 Roadless Rule and 2005 Travel Management Rule forced the Agency to follow narrow guidelines that harmed many sectors of the public and the human environment. Revising the current Blue Mountains Forest Plan should be done in a way that allows the Agency to improve its decision-making and better address the health of the public and forest.

Avoiding a Flawed Purpose and Need Process

Motorized recreationists require trail opportunities comparable to the hiking and mountain bike trails available in the forest. However, the purpose and need process has frequently failed to identify and address this critical issue. Restricting public comments to only specific routes does not sufficiently address the larger, significant concerns negatively impacting motorized recreationists. The use of comment rules should not result in the dismissal of significant issues and comments from motorized recreationists. The Agency must ensure that the purpose and need development adequately addresses the requirements and significant issues associated with motorized recreation.

Considering the Impacts of the Travel Management Rule and 3-State OHV ROD

Before the implementation of the Travel Management Rules for the BLM and Forest Service, motorized recreationists had reasonable access to motorized roads and trails. Nearly twenty years later, repeated closures have led to significant cumulative impacts. Motorized recreationists initially accepted the travel management rule without expecting it to lead to widespread closures, yet the Agency has implemented it in a way that has resulted in precisely that.

The travel management rules and the 3-State OHV ROD were not appropriately evaluated or disclosed to the public as actions resulting in massive closures. These deficiencies in evaluation, disclosure, and mitigation need correction, beginning with the record of decision for this project.

Furthermore, the Supreme Court's decision in *West Virginia vs. EPA* (https://www.supremecourt.gov/opinions/21pdf/20-1530_n758.pdf) provides an opportunity to examine whether federal agencies are exceeding their regulatory powers. For instance, if Congress

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has not explicitly authorized Subpart C travel management rules for regulating OHV and snowmobiling recreation, then the Agency may lack the authority to create such rules.

Ensuring Adequate Disclosure

The Agency must provide transparent information on the miles of existing trails closed to OHV use and their quality and importance to the human environment.

Additionally, the designation of logging roads as motorized trails results in wide roads that do not replicate the lost trail experience and may promote excessive speed and safety concerns. Such conversions fail to reasonably replace the experience provided by the original high-quality OHV routes.

Equal Consideration of the Human and Natural Environment

NEPA intended for the Human Environment to be considered equally alongside the Natural Environment. The Agency should recognize the need to provide motorized public with sufficient access and recreational opportunities on public land. Analyses and decisions must treat both the Human and Natural Environments with equal importance, in alignment with the original intent of NEPA.

Judges and lawmakers must take into account how complex NEPA regulations can encourage excessive lawsuits from environmental groups, maximizing environmental factors without a reasonable sense of magnitude. This can prevent balanced analyses and decisions that support reasonable multiple-use. Groups using lawsuits to impede the Agency should consider the broader impacts on both land and people, compared to the limited environmental benefits they seek.

Education as a Reasonable Alternative

The Agency managing the State OHV program should also lead OHV education initiatives. Recognizing that closures eliminate motorized recreational opportunities, education should be adequately considered as a means to address issues and foster responsible recreation.

Education can help mitigate negative issues associated with both non-motorized and motorized recreation and is a more equitable alternative to closures. Trail rangers should focus on education and mentoring rather than enforcement. Education as an alternative should be expanded and used to benefit all ages, especially youth.

Programs should demonstrate how fish and wildlife can coexist with OHV recreation through public education.

The Agency's education initiatives should include effective outreach to motorized groups and a youth component, such as Kids and Adults on Snowmobiles (KAOS) (<https://awsc.org/getmedia/22a8a18d-d1ba-4e97-a02e-da6fb92bcc79/Youth-Program-Flyer.pdf>).

Collaboration and Equitable Outcomes

The Agency should avoid overwhelming the public with involvement requirements or prioritizing the interests of well-funded activist groups. It should identify and reasonably meet the needs of the silent majority, including motorized and OHV recreationists.

Collaboration is only reasonable if all users benefit. To date, collaborative processes have favored non-motorized interests. For true equity, collaboration must result in equal opportunities for both non-motorized/wilderness and motorized/multiple-use recreation. The Agency should recognize that minimizing motorized recreation opportunities while maximizing non-motorized ones is not equitable.

Providing for Reasonable Sharing of Multiple-Use Lands

The Agency must acknowledge the responsibility of all users to share public resources, especially on lands designated for multiple-use by Congress. Rather than opposing one another, users should strive for cooperation and coexistence.

Motorized recreationists are willing to share opportunities with all other recreationists, though their willingness to share is often unrewarded, while non-sharing behaviors are incentivized for others. Sharing public resources is preferable to segregation, and there is ample land for all recreational uses if sharing is prioritized.

Motorized recreationists have consistently lost opportunities in planning actions, and this trend raises justice concerns. Notably, motorized routes closed by the Agency have never been reopened, even when needs and conditions change.

Addressing Justice Issues

Motorized recreationists supported area restrictions under the Off-Highway Vehicle Environmental Impact Statement and Proposed Plan Amendment for Montana, North Dakota, and South Dakota (3-State OHV) decision (<http://www.mt.blm.gov/ea/ohv/FSROD.pdf>), the USFS Travel Management Final Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>), and BLM OHV Strategy (<https://www.azbackroads.com/wp-content/uploads/National-OHV-Strategy.pdf>) as positive steps to control environmental impacts. They accepted restrictions rather than permanent closures, believing each motorized road or trail serves a multiple-use need. Adequate site-specific data and analysis are necessary to evaluate all values of each route, including recreational value.

Motorized recreationists relinquished 97% of historically available area under both the 3-State ROD and the travel management rules, expecting continued access to the remaining routes. However, they have not received recognition for their cooperation; instead, they have been penalized by further closures, contradicting the original agreements. The original intent was not massive closures beyond agreed restrictions.

The proposed action should acknowledge the agreements behind the 3-State OHV ROD and travel management rules, allowing continued use of existing motorized networks without further closures. The Agency should recognize that decision-making has provided more opportunities for non-motorized recreationists than motorized ones and should collect and use site-specific data and need factors for each route. Creating non-motorized opportunities should not come at the expense of motorized recreationists.

The Agency must consider the social justice implications of imposing restrictions on motorized recreationists and avoid allowing one user group to force their agenda on another. Endless lawsuits from environmental groups represent attempts to impose a non-use agenda, undermining broader

public needs for multiple-use lands. Environmental laws and guidance like NEPA and CEQ have not operated neutrally or equally for all groups.

Decisions should be based on accurate, site-specific data, including consultation with a representative cross-section of local motorized users. The quality of the human environment, and the value of motorized recreational opportunities, must be given due consideration.

The Agency should avoid comment rules that dismiss significant issues from motorized recreationists and ensure equal development and maintenance of motorized and non-motorized trails.

All requirements of the Equity Action Plan should be applied to motorized recreationists. The Agency should recognize that closures disproportionately affect motorized recreationists, while non-motorized users already have ample opportunities.

Public comments reflect the desire for adequate motorized access and recreation, regardless of participation in formal NEPA processes. Previous Agency actions have converted multiple-use land to limited-use areas, providing exclusive opportunities for a small number of visitors.

"Flow" should be provided equally to all users.

Motorized recreationists are disadvantaged in the legal system and cannot effectively defend their opportunities in court. The Agency should consider management approaches that do not require legal defense by the public.

Given the volume of NEPA and planning projects, it is unrealistic for motorized recreationists to be involved in every action. The Agency should focus on ensuring access and education for all, supporting shared use of multiple-use lands, especially as the population grows.

The Agency must refer to motorized use and access prior to BLM and USFS guidance from the 2000s as "authorized and open to use unless specifically closed." Areas, roads, and trails existing before these rules were not "unauthorized routes" and should be recognized as such.

Efforts should be made to include motorized recreationists in planning and decision-making processes, providing equal access for those who might otherwise be excluded or marginalized, including those disadvantaged in the NEPA process, people with physical disabilities, and underserved motorized sectors.

Decisions should be based on accurate data reflecting public needs, not political agendas. The Agency should recognize that prioritizing organized and well-funded environmental groups has led to an underserved sector of unorganized motorized recreationists whose interests deserve reasonable consideration.

Determining actual use of routes and areas is critical so decisions do not eliminate opportunities for those who depend on them for recreation.

Comment rules should not favor conservation or environmental groups.

Underrepresentation of motorized recreationists in interdisciplinary teams leads to bias, under-evaluation of needs, insufficient opportunities, and excessive closures, which must be corrected.

The Agency should evaluate why non-motorized recreationists are prioritized even when motorized recreationists have equal or greater needs, and address the lack of equal opportunity for motorized users.

The concept of "conflict of use" often reflects intolerance and prejudice, and the Agency should ensure this is not reinforced.

Finally, the Agency must analyze why motorized recreationists consistently lose opportunities while non-motorized recreationists gain, despite adequate land existing for all.

Executive Orders 11644 and 11989

On May 29, 2026, President Donald Trump signed Executive Order 14408 rescinding both Executive Order 11644 and Executive Order 11989, officially ending more than 50 years of strict federal restrictions on off-road vehicle (ORV) use on public lands. [[1](#), [2](#)]

The [White House Fact Sheet](#) details the arguments and future outlook resulting from the removal of these orders. [[1](#)]

The Administration's Reasoning:

- Subjective and Vague Rules: The Trump administration argued that the 50-year-old orders relied on "ill-defined" and subjective criteria that were difficult for agencies to operationalize in the modern era. [[1](#), [2](#), [3](#)]
- Economic and Recreational Obstacles: Officials stated that the rules created unnecessary regulatory burdens, delayed utility maintenance, and blocked energy and timber production. [[1](#)]
- Technological Advancement: The administration highlighted that modern mapping and GPS technologies, paired with existing statutory frameworks, allow for land management without relying on these "outdated" restrictions. [[1](#), [2](#)]

For more than 50 years, Executive Orders 11644 and 11989 have imposed significant negative impact on the human environment. Revision of the current Blue Mountains Forest Plan and Agency policy should directly acknowledge those negative impacts and take meaningful steps to remedy them.

Closed Unless Posted Open Policy

The “closed unless posted open” policy used by the Agency treats all roads, trails, and backcountry areas as closed to motorized vehicles unless a sign or map specifically indicates they are open. This reverses the long-standing public land access approach of “open unless posted closed.”

Current 2026 Legal Context

“Closed unless posted open” policies create de facto closures. When the Agency lack the resources to inventory, map, and sign historically used trails, those trails effectively become off-limits - even when they pose no environmental harm. Over the past 50 years, the Agency has not consistently maintained adequate signage, maps, or GPS tools to clearly inform the public. As a result, this policy has proven difficult to administer and unfair restrictions on motorized recreationists.

The tension created by this policy is why the Trump administration rescinded Executive Orders 11644 and 11989. Those orders required federal agencies to apply minimization criteria that often operated as a “closed unless posted open” framework for vehicle access. The 2026 rescission changes that federal policy baseline and should be fully considered in this action and Agency policy. This project and Agency policy should adequately address and mitigate the significant negative human environment impacts these policies have produced over the past 50 years.

14. Considerations Regarding the Impact of Motorized Access and Recreation on Fish and Wildlife

Introduction

Evaluation of motorized access and recreation impacts on fish and wildlife should rely on current, site-specific data and balanced consideration of all relevant factors. Overstating these impacts can lead to arbitrary and capricious decisions that fail to reflect on-the-ground conditions or properly balance the natural and human environments. Revisions to the current Blue Mountains Forest Plan should include guidance to avoid unbalanced decision-making and revisions to the plan should be structured to provide the Agency an opportunity to correct these issues in future decisions.

Example: Current Elk Populations in Montana

Recent elk population data, organized by hunting district and available at <https://fwp.mt.gov/conservation/wildlife-management/elk/population-and-distribution>, indicate that more than 50 districts are above the desired elk population count, just over 20 districts meet the desired count, and fewer than 20 districts are below it. In total, Montana's elk population stands at 141,294, which is 49,156 above the state's desired level of 92,138 yet motorized recreation opportunities are still being closed on national forest lands to provide elk security.

Importance of Site-Specific and Unbiased Impact Analysis

The Agency must utilize verified, site-specific data and studies to ensure an unbiased assessment of the magnitude of motorized recreation impacts on the natural environment. Impact analyses should also compare effects from all types of recreationists to natural influences, providing a true sense of relative magnitude. Alternatives to blanket motorized closures should be thoroughly evaluated, especially those that mitigate fish and wildlife concerns while maintaining recreational opportunities.

Limitations of Road Density Impact Criteria

Road density criteria are not always site-specific and may not accurately reflect local conditions within the project area. In many cases, these criteria overestimate the impact of motorized recreation on wildlife and often fail to reasonably consider possible mitigation measures or alternatives. Therefore, road density should not be the sole measure of motorized impact on wildlife habitat.

Role of Topography and Differentiation of Motorized Uses

Topography is a significant determinant of wildlife habitat. In areas with pronounced vertical relief, terrain can reduce impacts on wildlife as effectively as, or more effectively than, vegetative cover. Impact analyses should account for these local characteristics.

Additionally, the effects of motorized trails differ from those of roads, and analyses should differentiate by tread widths, levels of use, and traffic counts rather than applying a one-size-fits-all assessment.

Comparing Motorized and Non-Motorized Recreation Impacts

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Off-highway vehicles (OHVs) generally produce lower sound levels, offering wildlife a warning of human presence and resulting in less severe disturbances compared to some non-motorized recreation. Notably, there is no documented evidence of OHV operators having harmful encounters with bears, including grizzlies, whereas hikers and hunters have experienced many such incidents.

The Agency should also ensure that motorized closures enacted under the Endangered Species Act are supported by site-specific data demonstrating significant connections between OHV or e-bike activity and measurable impacts on endangered species.

Contextualizing Motorized Recreation Impacts

Motorized recreation is only one of many factors affecting fish and wildlife populations. Natural processes and other human activities often exert far greater influences. Impact assessments should compare documented OHV effects to natural variation and trends to avoid overstating their role. Evidence indicates that fish and wildlife, including deer, elk, and bears, can coexist successfully with responsible OHV use, especially when public education is employed to protect them.

Relative Magnitude of Other Human and Natural Impacts

Other human activities, such as hiking and hunting, can have greater impacts on wildlife and the environment than OHV recreation. Exaggerating the negative consequences of motorized recreation without supporting evidence may result in arbitrary decisions. Evaluations should always consider the full range of naturally occurring impacts, ensuring that regulatory actions are proportional and justified.

Wildlife Population Trends and Other Threats

In many cases, wildlife populations are at or above historical highs and exceed the land's carrying capacity. Furthermore, the negative impacts of wildfires on fish and wildlife far outweigh those associated with OHV recreation. This broader perspective is essential for sound decision-making.

Valuing Motorized Recreation and Wildlife Observation

The Agency should consider prioritizing motorized recreation opportunities, especially in the summer, recognizing their importance to the community. Evidence suggests that wildlife deaths, including those of grizzly bears, are more commonly linked to hiking and hunting than to OHV activity. Observations show that wildlife in national parks are largely unconcerned by motorized visitors, often reacting only when vehicles stop and engines are turned off. Wildlife viewing is an important component of the motorized recreation experience and should be valued accordingly.

Effective Management Alternatives and Evidence from Monitoring

Both summer motorized recreation needs and road density objectives can be met by permitting summer use and implementing motorized closures during fall hunting seasons, combined with public education efforts. Long-term monitoring, such as six years of observation in Yellowstone National Park, has demonstrated minimal impacts on wildlife from snowmobile use. Any closures enacted without adequate, site-specific data and analysis should be reconsidered.

Predators and Other Significant Impacts

Predators have a more significant effect on wildlife populations than motorized recreationists. Therefore, management strategies should reflect these realities rather than focusing disproportionately on motorized activity.

Evaluating Recreation Impacts: Evidence from the Literature

Contrary to popular perception, research indicates that non-motorized recreation activities have more documented negative effects on wildlife than motorized recreation, with non-motorized effects observed 1.2 times more frequently (Larson CL, Reed SE, Merenlender AM, Crooks KR, 2016, PLoS ONE 11(12): e0167259; <https://doi.org/10.1371/journal.pone.0167259>).

Reassessing Connectivity and Decision-Making Criteria

There is a lack of documented evidence that restricting motorized recreation improves connectivity outcomes for fish and wildlife, whether in summer or winter. Many past and proposed management decisions lack sufficient evidence for species protection, yet employ this rationale to restrict public access. The Agency should critically evaluate whether proposed actions truly protect species or simply serve to limit human activity.

15. Considerations for Motorized Access and Recreation Impacts on the Natural Environment

Introduction

This section emphasizes the need for a balanced, data-driven analysis of how motorized access and recreation affect the natural environment. Such analysis should be unbiased, adequately consider all relevant factors and alternatives in our national forests. The current Blue Mountains Forest Plan has contributed to unbalanced decision-making in favor of the natural environment and revision of the current Blue Mountains Forest Plan should address this issue including adequate mitigation.

Current Management Challenges



Figure 1 Downfall in the Thunderbolt Creek drainage, Beaverhead Deerlodge National Forest in 2022

We have observed extensive beetle-kill downfall in many national forests, creating barriers so dense that wildlife may be unable to move through them. This is not a desirable condition for the natural environment including wildlife and the human environment.



Figure 2 There is very little regeneration of trees after the Cave Gulch Fire in 2000, Helena National Forest

After wildfire, we have seen that trees often fail to return to the national forest. This is not a desirable condition for the natural environment including wildlife and the human environment.

Over the past 20 years, severe wildfires in Idaho and Montana have left many burned areas with little or no pine regeneration, including wildfires in the southern Idaho mountains and the Bob Marshall and Scapegoat Wilderness areas. This trend is documented in the WFIGS Interagency Fire Perimeters file at https://data-nifc.opendata.arcgis.com/datasets/5e72b1699bf74ee3f3aff6f4ba5511_0/explore?location=45.049594%2C-113.439327%2C8, as well as in Google Earth and other historical satellite imagery. Millions of burned acres remain without tree cover, reducing carbon storage, increasing atmospheric carbon dioxide, and contributing to climate change. The climate needs more trees, not fewer, and revisions to current Blue Mountains Forest Plan should address this substantial impact rather than be limited by the plan.

Unbiased Analysis and Use of Site-Specific Data

The Agency must ensure that its analysis is grounded in reliable data and studies, supporting an unbiased and balanced perspective on how motorized recreation affects the natural environment. This includes collecting and utilizing site-specific information as mandated by NEPA, CEQ guidance, and the 3-States OHV ROD. Such data-driven analysis is crucial to justify any proposed closure of motorized opportunities.

Comparative Impact Assessment

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It is essential for the Agency to compare the impacts caused by all user groups against the baseline levels of natural impacts. This comparative assessment will help demonstrate the true magnitude of motorized recreation's effects and facilitate informed decision-making. Decisions should be based on a clear understanding of the relative scale of impacts, rather than assumptions or generalizations.

Consideration of Alternatives to Closures

Before implementing motorized closures, the Agency should explore alternatives, such as public education initiatives, which may address concerns about the natural environment more effectively and with less restriction on recreation opportunities.

Differentiating Trail and Road Impacts

The Agency should recognize that motorized trails do not have the same impact on the natural environment as roads. Therefore, impact analysis should avoid a "one size fits all" approach. Instead, the Agency should develop criteria that differentiate between various types of tread and usage levels.

Recognition of Other Significant Natural Processes

When evaluating environmental impacts, the Agency should acknowledge that some natural processes may have more significant effects on the environment than motorized recreation. Analyses of off-highway vehicle (OHV) impacts should be compared to naturally occurring changes and levels, avoiding overstatement of motorized recreation's influence and preventing arbitrary or capricious decisions.

Sense of Magnitude in Decision-Making

Evaluations and decisions should incorporate a true sense of magnitude by comparing potential motorized impacts to naturally occurring ones. This approach helps ensure that decisions are rational and not arbitrary.

Agency Responsibility and Visitor Management

The Agency should not attribute high-impact issues in certain areas solely to motorized use, especially when Agency actions have concentrated motorized recreationists into a limited area and number of locations. This practice has led to significant impacts on both the natural and human environment. The Agency must take responsibility and work to mitigate all related impacts.

Prioritizing Motorized Recreation Opportunities

Motorized recreation opportunities should be given greater priority in Agency decision-making. The current approach, which restricts motorized access to the smallest possible footprint compared to pre-travel management rule conditions, has increased environmental impacts and limited recreation opportunities.

16. Importance of Comprehensive Analysis for Motorized Recreation

Introduction

It is essential that future analyses adequately consider all relevant information and references related to motorized recreation. This has not always happened in the Agency's decision-making under the current Blue Mountains Forest Plan. The revision of the rule should include guidance directing future evaluations and decision-making to adequately consider:

- The need for motorized recreation opportunities,
- The value of motorized recreation, emphasizing its significance to both the economy and human health,
- Alternatives that effectively mitigate any adequately documented impacts, and
- Alternatives that would enhance the motorized recreation experience.

Key References and Resources for Motorized Trail Design and Maintenance

A variety of authoritative references are available to guide the design, construction, and maintenance of motorized trails. Notable resources include:

- Trail Construction and Maintenance Notebook, USDA
- A Comprehensive Framework for OHV Trail Management, USDA
- Sustainable ATV Trails, USDA
- Designing Sustainable OHV Trails, USDA
- Keeping Water off the Trail, USDA
- Off-Highway Vehicle Program Route and Designation Guide, USDA
- Standard Trail Plans and Specifications, USDA
- Sustainable Trail Bridge Design, USDA
- Marshall University OHV Courses
- <https://nohvcc.org/assistance/manager-assistance/online-resource-hub/>
- <https://nohvcc.org/economic-impact-studies/>
- <https://nohvcc.org/assistance/manager-assistance/great-trails-projects/>
- <https://nohvcc.org/education/manager-education/great-trails-guidebook/>
- ATV Route Guideline Manual
- Wernex Report for Design Construction Maintenance, AMA
- Off Highway Motorcycle and ATV Trail Management, University of Illinois
- <https://go.campendium.com/wp-content/uploads/2022/03/2022CamperReport.pdf>
- Slow and Say Hello program <https://safetrailsmarin.org/>
- <https://nohvcc.org/education/manager-education/great-trails-field-guide/>
- <https://nohvcc.org/education/rider-education/>
- <https://nohvcc.org/education/manager-education/great-trails-field-guide/>
- <https://nohvcc.org/assistance/manager-assistance/online-resource-hub/>
- <https://nohvcc.org/assistance/manager-assistance/online-resource-hub/webinars/>
- <https://nohvcc.org/economic-impact-studies/>
- Colorado OHV Report, https://cdn2.assets-servd.host/material-civet/production/images/documents/Abt_CO_OHV_EconContributionReport_03132024.pdf?dm=1713978990

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- Wisconsin OHV Report, <https://cdn2.assets-servd.host/material-civet/production/images/documents/2024-Economic-Report-Summary.pdf?dm=1713976635>

Considerations for Monitoring and Seasonal Access

When assessing motorized use, it is important for the Agency to recognize that the presence of motorized tracks is not always a definitive indicator of recent motorized activity. Practices such as “Tread Lightly,” as well as natural factors like rain, wind, and snow, can erase tracks and obscure evidence of use.

In addition, opening and closing dates for motorized recreation access should be thoughtfully scheduled. For example, opening dates might be set for weekends, such as the second weekend in May, while closing dates could be scheduled for weekdays, such as the second Monday in October.

Also, adjustments should be considered for opening and closing dates based on year-to-year climate conditions and long-term climate change.

17. Considerations for Design, Maintenance, Funding, and Gas Tax Allocation for OHV Recreation

Introduction

The Forest Service faces an estimated \$8.6 billion to nearly \$11 billion deferred maintenance backlog for its vast network of national forest roads and trails. The Agency manages over 380,000 miles of roads - more than twice the size of the U.S. interstate highway system. Deferred maintenance cost estimates range from \$6.9 billion to nearly \$11 billion in overdue repairs for roads alone. Many routes are affected by poor drainage, damaged culverts, and washed-out surfaces that degrade water quality and limit access.

The Forest Service trail system includes roughly 164,000 miles of multiple-use and backcountry recreational trails. Internal assessments and status reports indicate that mounting backlogs, compounded by seasonal staffing constraints and extreme weather impacts, have left a small minority of trails meeting standard trail maintenance criteria. Deteriorating trails have reduced recreation opportunity and visitor safety.

Revisions to the current Blue Mountains Forest Plan should adequately address the maintenance needs of roads and trails in the national forest system.

Backlog of Maintenance of Existing Roads, Trails, and Facilities

Motorized recreationists, including OHV users, generate substantial gas tax revenue through the fuel used in their vehicles, but only a small share is returned to maintain the roads, trails, and facilities they rely on. This funding imbalance has created a significant maintenance backlog that reduces the availability and quality of motorized access and recreation. Revising the current Blue Mountains Forest Plan should address these impacts, needs and mitigation.

Backlog in the Development of New Roads, Trails, and Facilities

Motorized recreation is the fastest growing recreation sector yet there has been little to no development of new roads, trails, campgrounds, dispersed camp sites and other facilities that enhance their recreation pursuits. This lack of action has created a significant shortage of opportunities that reduces the availability and quality of motorized access and recreation. Revising the current Blue Mountains Forest Plan should address these impacts, needs and mitigation.

Equitable Allocation of OHV Gas Tax Dollars

The Agency should ensure that all off-highway vehicle (OHV) gas tax dollars spent on non-motorized recreation are returned to OHV recreationists who originally contributed those funds. It is important for the government to fully recognize the significant human and environmental impacts that arise from not returning an equitable share of gas tax revenue paid by offroad users to the maintenance and development of offroad opportunities. To address this, the Agency should be fully committed to pursuing OHV grants, maintaining OHV trails, returning a fair percentage of gas tax proceeds to OHV recreation, and expanding OHV opportunities. Revising the current Blue Mountains Forest Plan should address these impacts, needs and mitigation.

Maintenance Needs and Funding Disparities

Nearly all OHV routes require consistent maintenance, including proper drainage mitigation and clear signage. The total gas tax paid by OHV recreationists exceeds the maintenance and education needs of OHV recreation, yet much of this funding has not been returned to support these activities. The Agency should acknowledge that an equitable portion of gas tax revenue has not been allocated to maintain and support OHV recreation for an extended period, leading to significant cumulative effects.

There are major issues concerning the inequality of funding for maintenance, design, construction, and gas tax allocation between motorized and non-motorized recreation. If motorized use is eliminated from an area, motorized funds should not have been used there previously, and any such funds should be equitably redirected to new motorized projects.

Funding Sources and Prioritization

Significant funding sources for motorized trails are available at both federal and state levels. Given the substantial needs and historical funding inequities, motorized trail maintenance should be the top priority for all available trail maintenance funding.

Public Involvement and Long-Term Commitment

Without public involvement, maintenance of motorized routes diminishes, and rideable routes disappear. The Agency currently struggles to keep up with motorized route maintenance, which requires a long-term commitment and should be prioritized. Whether intentional or not, neglecting maintenance effectively closes motorized routes, contributing to a growing trend of motorized closures that do not align with public needs.

Restoration and Collaboration Initiatives

To meet public demand for motorized recreational opportunities, the Agency should launch a nationwide initiative to restore and enhance all recreation facilities, including trails and roads.

Restoration efforts should be integrated into burned area and flood recovery actions, focusing on trail tread restoration and removal of obstacles blocking routes.

Collaboration with organizations such as the Post Wildfire OHV Recovery Alliance (PWORA) - a national nonprofit dedicated to sustainable OHV recreation recovery after wildfires and natural disasters - should be prioritized.

Maintenance and Erosion Control Measures

The Agency must address the lack of regular maintenance on motorized routes. Erosion concerns associated with these routes can be mitigated by constructing and maintaining water bars, rolling dips, and other drainage features.

Adequate signage and maintenance are crucial, especially when routes are affected by timber and vegetation management activities.

The Agency should consider providing pullouts for passing on 50-inch-wide trails in narrow sidehill areas, and, where appropriate, designate trails with limited passing as one-way routes.

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OHV recreationists prefer routes that are sustainable, safe, and enjoyable. Erosion control measures, such as rolling dips and water bars, can help meet these needs. The Agency should implement sufficient erosion control on all motorized routes included in the project.

Replacing Lost Motorized Recreational Opportunities

Motorized recreational opportunities are continually lost due to fire, flood, natural processes, and land management decisions. To meet ongoing public demand, the Agency should adopt a policy of continuously creating new motorized opportunities to replace those lost.

Equitable Camping Policies and Route Planning

When motorized access and camping is closed early or late in the season, such policies tend to favor private landowners, including cabin owners that have access to these areas.

Out-and-back routes that lead to scenic overlooks or offer varied views and interesting destinations are valuable, as long as they do not comprise the majority of available motorized routes.

Accessibility and Close-to-Home Opportunities

Finally, the Agency should recognize the importance of providing close-to-home motorized trail riding opportunities to meet the needs of local recreationists including old and young recreationists who are not able to travel long distances.