



## Coalition for Public Access

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September 1, 2008

Santa Fe Travel Management Planning  
474 Rodeo Road  
Santa Fe, NM 87505

Re: Travel Management

As advocates for multiple use access to public lands, the Coalition for Public Access is extremely concerned about the Santa Fe National Forest's (SFNF) Travel Plan and the process it used to formulate the Proposed Action. We concur with the comments espoused by the Blue Ribbon Coalition in its request that you consider three key comments as you move forward in the planning process.

1. The Proposed Action is flawed and should be re-considered because the agency improperly estimated environmental impacts.

It appears that existing routes identified by OHV users for incorporation in the travel system are not being considered simply because they cross a so-called "sensitive polygon." In other words, a route will not be considered based on soil concerns merely because it lies within a mapped "sensitive soil" area and not because of any site-specific analysis regarding the route's impacts on soils or other natural resources.

Such "planning by polygon" is not consistent with Forest Service planning regulations and does not comply with requirements of the National Environmental Policy Act (NEPA).

We request that the SFNF take a site-specific hard look and meaningfully consider the potential environmental impacts of specific routes and alternatives presented to the agency by those who are directly affected by the decision. We also request that, when considering potential environmental impacts, all alternatives consider potential mitigation efforts as an alternative to closure.

2. The SFNF must develop a true range of Alternatives.

The off-highway vehicle community generally supports designating roads and trails for motorized use. We also support thorough environmental review and analysis in the route designation process, as well as ongoing monitoring and maintenance of the OHV infrastructure. What the OHV community does not support is being presented with a "range" of management alternatives where **all of the alternatives represent a significant reduction in OHV opportunity**. The intent of the Travel Management Rule is "revising regulations regarding travel management on National Forest System lands to clarify policy related to motor vehicle use, including the use of off-highway vehicles." **It is not intended to be a means to eliminate, or even drastically reduce, motorized recreation on National Forests.**

NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to Proposed Actions analyzed during a NEPA process. The alternatives section is considered the "heart" of the NEPA document.

In order to facilitate the formulation of a true range of Alternatives, we formally request that you adopt the Alternative presented by the Blackfeather group either as a stand-alone Alternative

or as the basis for an Alternative that attempts to meet the documented increase in OHV recreation.

3. Planning issues: We request that you adopt the following Planning Issues -

Proposed Planning Issue A: **Cumulative loss** of motorized and mechanized recreational opportunity.

The cumulative loss of motorized recreational opportunity should be brought into the analysis and incorporated into the decision making process.

Closures are being proposed via other Forest Plan revisions and Travel Management Plans across Region 3. The Bureau of Land Management is also proposing significant closures. The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past and threaten the loss of use for future recreation activities and other potential multiple use purposes.

Proposed Planning Issue B: There is a documented need to provide motorized trail-based opportunity.

Conversely, designated Wilderness and other non-motorized recreation opportunities are plentiful. Alternatives should be developed to meet the need for a motorized trail experience and all alternatives should consider its impacts on motorized recreation opportunities across the entire forest.

It should be noted that the need to provide for, or at least not reduce the current amount of, routes available for motorized use was a key theme during the many pre-scoping meetings and discussions as well as written comments.

Proposed Planning Issue C: Trail experience distinct from road experience.

It is important to recognize the distinction between "trails" and "roads" during this planning process. A true trail experience is highly valued by the recreating public. Providing an arguably adequate road system does not in any way begin to address the demand for motorized single track and ATV trails.

We further request that the NEPA review provide a succinct analysis of the roads proposed to be closed in each Alternative in relation to their dates of establishment or construction and to **report the number of roads slated for potential closure that pre-existed the forest service jurisdiction** over the lands they are within. Such a report, by its nature, will require a rationale for the Forest Service's need and purpose in denying the citizens of New Mexico their valid legal rights-of-way over those roads.

Sincerely,

**COALITION FOR PUBLIC ACCESS**

Smith, Nevada

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