



**US Department of the Interior
Bureau of Land Management
Carson City District Office**

Resource Management Plan Revision and
Environmental Impact Statement



TRAVEL MANAGEMENT WORKSHOP REPORT
JANUARY 2013

This page intentionally left blank.

TABLE OF CONTENTS

Chapter		Page
I.	TRAVEL MANAGEMENT WORKSHOP REPORT	I-1
1.1	Workshop Preparation	I-2
1.2	Workshop Format.....	I-2
1.3	Comment Summary	I-2
1.4	Route Data Provided by Public	I-3
1.5	Next Steps.....	I-4

APPENDICES

A Table of Comments Received

TABLES	Page
Table I-1 Public Workshop Attendance.....	I-1
Table I-2 Primary Mode of Travel	I-3
Table I-3 Travel Zone Identified in Comments.....	I-3

ACRONYMS AND ABBREVIATIONS

Full Phrase

BLM	United States Department of the Interior, Bureau of Land Management
RMP	Resource Management Plan

CARSON CITY DISTRICT RMP TRAVEL MANAGEMENT WORKSHOP REPORT

The Bureau of Land Management (BLM), Carson City District is collecting information on roads and trails to help implement a comprehensive travel system for all modes of travel (motorized and non-motorized) as part of the Resource Management Plan (RMP) update effort. In October 2012, the BLM held public workshops in Reno, Fallon, and Minden, Nevada, to obtain input from the public and other stakeholders and to provide information on the travel management planning process. Comments were accepted until November 30, 2012.

The workshop objectives were to:

- provide an overview of how travel management and route designations coincide with the RMP effort
- obtain information on routes, uses, and conflicts in high-use areas on BLM-administered lands
- have participants identify existing access points and other issues regarding travel on BLM-administered lands

Table I-1, Public Workshop Attendance, shows the number of attendees at each workshop.

Table I-1
Public Workshop Attendance

Location	Date	Attendees
Reno	October 10	40
Fallon	October 16	32
Minden	October 18	49
Total		121

I.1 WORKSHOP PREPARATION

On September 25, 2012, a press release was published with dates, locations, and information about the workshops. A postcard with this information was also sent to the BLM mailing list. In addition, draft route inventory maps were posted on the RMP website on September 26, 2012, allowing the public to review the route inventory ahead of the workshops. BLM staff also provided informational presentations to local organizations and governing bodies when requested.

I.2 WORKSHOP FORMAT

Each public workshop began with a PowerPoint presentation led by EMPSi staff. The presentation provided an overview of travel management and its regulatory framework, how travel management relates to the Carson City District RMP, and the specific steps of the route inventory and designation process. At the conclusion of the presentation, the public was invited to visit stations around the room with maps showing the existing route inventory for specific areas. The maps were developed using current BLM route inventory data and printed by the BLM in poster format on foam core poster boards. Each color map displayed one of the 16 travel management zones in the planning area, with a land status map on one side of the poster and a topographic map on the other side.

Workshop attendees were encouraged to visit the stations and provide input on specific routes. In particular, attendees were asked to comment on the completeness of the route inventory and which routes were important to them. BLM and EMPSi staff also encouraged feedback on routes that were missing from the maps. Comment forms were provided at the stations, example comments were shown in the PowerPoint presentation, and markers were available at each station so that attendees could comment directly on the maps.

I.3 COMMENT SUMMARY

Comments were submitted at the workshops, via email, and via posted mail. A total of 75 discrete comments were received from 33 individuals, organizations, and government agencies. Many comments addressed multiple forms of access across several routes or areas. Most of the comments pertained to recreational use of the transportation network. No comments regarding administrative access were received. However, several comments related to seasonal or other limits on access to protect wildlife habitat and sensitive resources and to address conflicts in the urban interface.

All comments received are outlined in **Appendix A**, Table of Comments Received. Electronic copies of the original comments are on file at the Carson City District Office.

Table I-2, Primary Mode of Travel, provides a summary of the different forms of travel identified in the public comments. As the table shows, many comments listed multiple modes of travel or did not identify a mode of travel.

**Table I-2
Primary Mode of Travel**

Form of Travel	Number of Comments
Motorcycle	15
Full-sized vehicle	10
ATV	3
Mountain bike	1
Foot	4
Other ¹	42
Total	75

¹Comment pertained equally to multiple forms of travel, or no form of travel was identified.

Table I-3, Travel Zone Identified in Comments, provides a summary of the number of comments relating to each travel zone.

**Table I-3
Travel Zone Identified in Comments**

Travel Zone	Number of Comments
A-1	6
A-2	6
A-3	12
A-4	1
B-1	0
B-2	4
B-3	6
B-4	3
C-1	1
C-2	2
C-3	1
C-4	0
D-1	0
D-2	4
D-3	1
D-4	0
Other ¹	28
Total	75

¹Comment pertained equally to multiple travel zones, or no travel zone was identified.

I.4 ROUTE DATA PROVIDED BY PUBLIC

In addition to comments on preferred uses and management for route and the transportation system, the BLM received electronic and written route data from several sources. These data will be incorporated into the draft route inventory,

reviewed for accuracy, and be made available for review by BLM specialists prior to finalizing the route inventory.

I.5 NEXT STEPS

EMPSi is currently digitizing all of the suggested route additions. Suggested route additions will be confirmed via satellite imagery or field visits by BLM staff or the Great Basin Institute team. Route-specific comments will be linked to those routes in the route database; during the route designation workshops, the BLM interdisciplinary team will be able to see which routes were the subject of public comments.

Once the route inventory is finalized, EMPSi will coordinate the route designation process with BLM staff. During this process, each route will receive a proposed designation and use for each RMP alternative.

The range of route designation options will be presented for public comment alongside the Draft RMP, currently scheduled to be released in Spring 2014.

Appendix A

Table of Comments Received

This page intentionally left blank.

Table A-1
Text of Comments Received

Red Rock next to Pyramid Reservation and north of 445. This area should be seriously looked at as a state park from the big needle down to flats north of Hwy 445. Rock crawlers along with partiers, campers and graffiti has become a common occurrence in this area.

Moon Rocks. People that camp over night have been chainsaw cutting juniper trees for firewood within main site and for a couple miles around the area. Soon there will be no trees. Also the rock crawlers are running over, pulling out and purposely destroying trees from Spanish Springs north to and past Moon Rocks.

Mountain bike riding in Paiute Canyon and dirt bikes in Moon Rocks area/Dogskin.
Moon Rocks OHV - Rock crawlers should be restricted to the main arena of large boulder-embedded rock. They should not be allowed to access trails on and into the ridge of dogskin. They should as well as dirt bikes be restricted from the area of Needle Rock to existing roads only! This is the most beautiful red rock in northern Nevada and needs to be designated a park area before all of the hobbits are destroyed.

Signage - mountain bikes on downhill use front brake in unison with back brake - this will help keep trails - especially in switchback - from being trenched from rear tire slides. Also a notice should be posted as to no shooting within the canyon immediately south of Golden Eagle Park or anywhere close to the existing singletrack trails.

Mining ruins even at top/top, lots of houses old stone cabins was intact 5 years ago - some vandalism.

All routes now assigned a number should remain open - motorized 2 track.

All paved roads should be clearly depicted to assist map reference on all maps

From 4140 to 1258: Add additional trails to connect. Need to add trail marked #1 through #5 DB (note: these are marked on the posters from the public meeting)

Stead Mot-x and surrounding area. Many dirt bike trails above and to south of Stead MX track - please list on map

Add trail #1 through #8 DB (note: routes were drawn on poster at the meeting)

Routes TF1 and TF2: Very popular after-work trail for both horse and moto

Route continues into Eldorado Canyon

Zones B-3 and C-3

I have been putting on a motorcycle race in Yerington for the last 14 years and none of the past approved race course is on the maps. I wrote in the race course that we have run before.

Routes 310, 779, 171, and 402: Used seasonally by landsailers, camps, trail bikes, and dualsport bikes (Flanigan Dry Lake)

No trails in Dead Camel area, were on previous map.

Zones A-4 and B-4: Missing trails and washes near reservation at Mullen's Pass

Table A-1
Text of Comments Received

Route 1883 to 993: Missing singletrack trail (BJH #5) wash.
Route 2014 to 3885: Missing singletrack trail (BJH #6) singletrack to wash.
3885 to 1296: Missing trail (BJH #1) rocky singletrack
4063 to 863: Missing trail (BJH #2) sand wash
1505 to 863: Missing trail (BJH #3) singletrack trail
1856 to 3889: Missing trail (BJH #4) singletrack trail
Zones C-1 to C-4: No trails from Dead Camel and Salt Wells area was on previous map
No motocross track at Stead, or trails around
Zones A-3 and B-3: See attached maps. Use = motorcycle events, motorcycle riding, family rides, hiking/backpacking, mountain bike riding, camping. Comment = Missing trails used during motorcycle event in 2007.
Zones B-3 and C-3: see attached maps. Use = motorcycle riding, family rides, hiking/backpacking, mountain bike riding, camping. Comment = Missing trails used during motorcycle event in the area in last 10 years. I have attached maps.
All Zones. Why are all the previous permitted race courses not on the maps and are already EA should be designated for race course.
If it has a number leave it open!
Zones C-3 and C-4: Please keep the main routes thru the canyon and mountain tops and keep the connecting routes. Thanks!! *Keep numbered routes open!!
Please keep all routes open thru all canyons and mountain tops, and mines/ghost towns
Zones B-4 and B-3: Please keep all main routes thru canyons and ridge tops. Keep connectors to main routes, if they are numbered leave them intact!!
For route 296 and others in I-80 corridor (hiking/biking): Please ID a non-motorized trail along I-80 and the Truckee River
(Note: see JRP on map). Use = hiking/biking. Comment = Please ID trail adjacent to I-80 east of Vista, either north or south of I-80
Send map or shapefile of this section of road
Routes 3932, 3918, and 1747. Use = ATV and mountain bike. Comment = Route shared by mult. Veh. Types. Maint is +- good. Using these trails by ATV, bicycle, we enjoy the scenery and solitude. Cyndy is disabled and rides with a person, but enjoys photographing Nevada. Diverse animal Ute, and land. A fantastic place to ride.
Use = off-road, camp, fish, hike. Comment = Well used route, maint. Good, good fishing in area
Use = ATV, hike, fish, nature love. Comment = One of the best creeks/eco systems in NV. Rough but accessible, maint OK. Parking OK by hwy or along entrance road. Our purpose is to enjoy the many uses here, fish & photograph. We just like being outside!

Table A-1
Text of Comments Received

I would like to see this route closed to motorized travel as the adjacent valley (Hungry Valley) is heavily used. Seeking quiet.

Dead Camel Mountains/Salt Wells: None of the previously permitted courses are shown on the map. Possible SRMA?

Below is an email sent to you from the High Sierra Fly Casters Board Members. I would like to inform you of my support of what is written below. As a retail establishment that caters to those who love the outdoors including anglers, improved access to the East Fork of the Carson River would not only help our store, but other outdoor establishments as well. I appreciate you taking the time to read this. It has come to our attention that public comment is due soon for the BLM's Travel Management Plan revision. This was brought to our attention via NDOW as they completed a study of the East Fork of the Carson river that we were involved in via our conservation board member Grant Gardner. We donated water temperature trending measurement equipment for this study. In the past we have helped NDOW when needed for planting fish above the broken dam on the East Carson River. We feel this is beneficial to all anglers to get fish above the dam. We feel improving road access on the Leviathan road from approximately Doud Springs West to the East Fork of Carson River (T 11 N R 21 E Sec. 19 & 20 and T 11 N R 20 E Sec 26). Improving access at this location would allow NDOW access with their fish stocking vehicle; subsequently improving the fishery and anglers experience. Improving this section of road would allow NDOW to fulfill the request received from anglers to improve the angling experience along the East Fork of the Carson River.

We are a fly fishing club (Located in Minden/Gardnerville) that has 88 members and support education and conservation. We also fund Reel Recovery (for men living with and/or surviving cancer), Casting for Recovery (for women living with and/or surviving breast cancer, Reel 2 Kids (for children with cancer and their families), Reel Escape (for women with all types of cancer) and Reel Vets and Reel Heroes (for US Military Veterans). At these retreats, participants have an opportunity to fish in the beautiful Sierras, discuss their life situations, and develop new and lasting support systems. We sponsored five Reel events during 2012.

This fall we also sponsored a fly fishing introduction and practice for 20 plus girl scouts at Mitch Pond in the Gardnerville Ranchos.

We feel this improvement in access would benefit to all Northern Nevada Anglers.

Show county lines please

Single Tree @ Pine Nut Road (Past Dump) - Staging area provide restroom, loading & off-loading dock, garbage cans/bin (we can provide labor)

Old wagon route over Pond Peak & down to Olinghouse - connects with #80

(note: route drawn on the big map in the Pine Nuts area). Use = hiking, OHV, 2-track. Comment = It is a spur trail to Mt. Siegal - good views and valley

See it kept open for motor use. Great year round trail and obstacles for all types. We would also like to "adopt-a-trail" for this trail and work with BLM for future maint and use

Table A-1
Text of Comments Received

Use = motorized, non-motorized

Comment = These trails are accessible from trails on B-3 and use by motorized and non-motorized will enhance tourism and event center usage.

(note: "multiple" routes circled on map at meeting)

Use = motorized and non-motorized

Comment = These trails are accessible from the Dayton Events Center (rodeo arena). To have them accessible to motorized and non-motorized use will help tourism and community

(note: multiple routes circled on map at meeting)

Fishing access. Improve road access on the Leviathan road from approximately Doud Springs West to the East Fork of Carson River (T 11 N R 21 E Sec. 19 & 20 and T 11 N R 20 E Sec 26). Improving access at this location would allow NDOW access with their fish stocking vehicle; subsequently improving the fishery and anglers experience.

The High Sierra Fly Casters, a not-for-profit civic organization located in Gardnerville NV, has been working closely with the Nevada Department of Wildlife to improve the quality of fishing on the East Carson River between the California State Line and the structure known as "Broken Dam" located off Washoe Road, south of the town of Gardnerville.

Access to this area is extremely limited due in large part to the poor condition of roads and trails.

Recreational use is currently limited to high clearance four wheel drive and off road vehicles while NDOW has stopped augmenting fish in this area because they are unable to drive their stocking vehicles to the river to perform fish plantings. Improving a road that currently exists in this area would make it more accessible for anglers, other recreational users, and NDOW. High Sierra Fly Casters support NDOW's proposal to improve road access to the canyon area via the Leviathan road from approximately Doud Springs West to the East

Fork of Carson River (T 11 N R 21 E Sec. 19 & 20 and T 11 N R 20 E Sec 26 on Travel Management Workshop Map A3). Improving access at this location would allow NDOW access with their fish stocking vehicle; subsequently improving the fishery and anglers experience.

Just before the west end of Rt 44 was the old mining camp of Gregory and when I was younger 65 or 70 years ago we used to go from there NW up over to the top of Red Hill, where there were a lot of tree toggels (beats and timber etc. - willow, oak, and others). I am now age 83 so probably won't ever explore this mountain again, but I think others would enjoy a road trip to the top of the Dead Campell Mountains.

Hunting with full-size vehicle access

Hunting with full-size vehicle access

Hunting with a full-size vehicle

Use = Prospecting

Comment = Road to old mine

Table A-1
Text of Comments Received

Heavy use stream/canyon trail some parts washed out at alt. trails - maint. Recommended. Enjoyable scenery. Getting out is our purpose.

Routes = 722, 714, 717, 718, 727, 728, 734, 730, 735

Use = ATV, Jeep, some walk

Comment = Trails fair. I am passenger as I'm disabled, but enjoy the wide open spaces. Saw some horses, but never any issues.

Routes = 597, 447, 477, 369, 361, 354, 242, 290, 287, 241, 480, 461, 379, 374, 351, 245, 339, 285, 266

Use = Jeep, ATV, some hike, some bike

Comment = Most trails were passable, some rocky. Diverse, interesting viewing, many reptiles to look at

Please note: some Fallon meeting attendees said the maps are missing routes from the west side of the Stillwater Range up into the mountains. Need to check aerial imagery and add routes to inventory if/as applicable.

Table A-1
Text of Comments Received

Thank you for the opportunity to comment on travel in the Pinenut Mountain Range.

I ride my dirt bike, my horses, my mountain bike and I hike through the Pinenuts and I am intimately familiar with the area and the changes it has gone through in the last 45 years.

As recreation has increased in this area, the need to reduce user conflicts has become necessary. I can be riding my horse on one side of a hill, and suddenly, gunfire zings over my head and freaks out my horse. I would love to see specific shooting areas. Places that shooters can go (and be responsible for cleaning up) and all other users know to avoid those areas.

I would love to see all the various roads and trails recognized and incorporated into your travel plan. Unfortunately, it is the trend to close "user created trails". This ultimately creates more user conflict and also degrades the trails further. We need more trails, not fewer trails.

Equestrian-only trails are not necessarily needed; but non-motorized is important. Even at the trailheads, it's impossible to safely unload a horse when a motorcycle is buzzing past. The Stephanie Lane equestrian staging area is great, but apparently not designated as equestrian-only (there were people with dirt bikes there a couple of weeks ago when I rode through).

We would love to see trailheads with camping options. I live at Lake Tahoe and have a 1 hour drive each way to recreate in the Pinenuts. It would be great to not only have designated camp grounds with bathrooms, table, fire rings, etc., but also areas that are okay for dispersed camping for those of us who love the quiet and isolation.

Trail maintenance must be addressed. When a motorcycle trail gets "whooped out"... then the user tends to widen the trail to avoid the whoops and/or creates parallel trails. It is impossible to ride a horse on a whooped out trail. It also becomes impossible for beginner or immediate motorcycle users to enjoy those whooped out trails. There are machines that can cut whoops and smooth trails ~ would this be a possibility for our area?

I'm concerned how the BLM is going to sign trails. The beauty of these desert hills is that they are wild and natural and seeing a bunch of signs out there would ruin that beauty. Hopefully, only maps will indicate trails, not actual signs on the ground.

Keeping trails open that have loops and connect to other trails should be a priority. Going out and back is hardly ever a trail-users' first choice.

When I walk my dog (and even riding my horse), I have a safety issue with not knowing where animal trap lines are placed. Is there a specific place that the lines run? Can they be designated on maps or marked for public safety?

Thank you for your attention.

Table A-1
Text of Comments Received

It is our desire to ensure that habitat conservation measures for wildlife are incorporated into the travel management planning process. As a cooperating agency, NDOW supports your efforts and offers the following preliminary recommendations for consideration and incorporation into the travel management plan. NDOW generally supports designating the CCD as “limited” defined as “areas restricted at certain times, in certain areas, and/or to certain vehicular use” across the majority of the Carson District. Furthermore, we prefer such designations as “limited to designated routes” rather than “limited to existing routes” to reduce the likelihood of legal new route establishment directly following an unauthorized user-created route. We understand and support that areas in Wilderness, Wilderness Study Areas (WSA), etc. will be designated as “closed” while other areas such as Sand Mountain, the Moon Rocks, etc. may remain “open”.

Permanent Road Closures: We support the closure of duplicate destination roads, no longer used mine exploration grid roads, and mitigation of resource impacting or degrading routes. Increased road densities have been proven to impact wildlife through habitat loss and fragmentation, increased stress levels demanding higher energy requirements, and direct mortality. We encourage closed roads to be reclaimed. We discourage the elimination of sole source access that provides a road option for wildlife recreationists.

Temporary Road Closure/Seasonal Restriction: We encourage temporary seasonal restrictions to occur on roads to avoid wildlife resource impacts. For example, seasonal restrictions should occur in crucial mule deer winter ranges during the winter season to lessen stress. Seasonal restrictions should occur from December 1 – April 1 in such areas as Petersen Mountains, Sand Hills and northern 2/3 of Dogskin Mountains.

Overland travel and unauthorized user-created roads: We understand and support the need to control the ever expanding network of new trails created by individuals into areas without roads. We recognize the resource damage that can occur and are willing to cooperatively work with the CCD to prevent its occurrence.

Game Retrieval: We support allowing challenged hunters the opportunity for game retrieval.

Signage: NDOW suggests marking “closed” roads as such and leaving “open” roads un-marked. Signage is a direct way to inform users of closure and is not dependent upon the individual having a travel management map in their possession.

Law Enforcement: We encourage increased law enforcement activities to address unauthorized use. Additionally, we encourage unauthorized use reporting. Furthermore, a coordinated process should be developed jointly by NDOW and the BLM as it is our expectation that the majority of the violations will be documented by NDOW wardens who have no enforcement authority over federal regulation pertaining to travel restrictions.

Education: We encourage educating the public and OHV user groups about the potential wildlife impacts that are associated with unauthorized travel. We also encourage working cooperatively with OHV groups to build trust, ensuring participation and increasing unauthorized use reporting.

Table A-1
Text of Comments Received

Sensitive Habitats: We recommend re-routing and rehabilitating roads that are or have the potential to impact sensitive meadows, seeps, springs, riparian areas, and other waters. For example we encourage re-routing roads that parallel streams or have multiple stream crossings to reduce sedimentation. Such sedimentation can destroy fish eggs for cutthroat and rainbow trout during springtime spawning (4/15 - 6/15) and for brown and brook trout during fall spawning (9/15 – 11/15). In areas where re-routing is not feasible, temporary restrictions may be necessary. Please see the enclosures which identify the kinds of fish by water body. Additionally, we recommend conducting a culvert inventory to determine if they are impeding fish passage and replacing those culverts that are impediments.

Improve road access: Improve road access on the Leviathan road from approximately Doud Springs West to the East Fork of Carson River (T 11 N R 21 E Sec. 19 & 20 and T 11 N R 20 E Sec 26). Improving access at this location would allow NDOW access with our fish stocking vehicle; subsequently improving the fishery and anglers experience. Improving this section of road would allow us to fulfill requests received from many anglers over the years to improve the angling experience along the East Fork of the Carson River.

Raptor Protection: Protect all occupied identified raptor areas with area closures from March 1st thru June 15th. If an active nest is observed positive identification should occur prior to permitting activities.

So how do we inventory or comment on site specific planning decisions when we don't know what the land use allocations will be? We can't. And this is a huge problem going forward. Please do not underestimate this issue. The solution to potential “two plans in one” appeal and litigation issues, as well as the path forward to creating manageable and sustainable site specific management plans is the same: robust communication and collaboration with CCDO visitors and recreation-based clubs and organizations. The BLM can and should meet with users immediately and identify areas that may be limited, or off limits entirely, to motorized and mountain bike recreation in order to assist route data collection efforts. BLM staff should discuss areas where motorized focus SRMA's may or may not be appropriate. We urge the BLM to assist both its staff and user groups to prioritize route inventory efforts.

Concern about inadequate inventory. The statement: “there is no way to compile a complete route inventory when users are making new trails every day” is not an excuse for beginning site specific route planning without a reasonably adequate route inventory.

Adequate inventory is a key planning need in any land use planning effort. BLM's Travel and Transportation Handbook (H -8342) includes many references to route inventory needs. We are extremely concerned that the agency seems equally unconcerned with its woefully inadequate route inventory. We strongly urge the CCDO to prioritize the effort to compile a adequate route inventory before developing alternatives.

Routes used for permitted events

Any route that has been used for a permitted event should be considered “low hanging fruit” for inclusion in the final travel plan. The BLM is encouraged to identify all routes used previously permitted events and quantify what level of analysis was used for the permit. Permitted events, and accompanying paperwork may be helpful in estimating impacts to similar uses on similar routes that were not permitted.

Table A-1
Text of Comments Received

SRMA's, Focus Areas, Recreation Management Zones, Travel Management Areas, etc
 Related to our comments above, it seems inappropriate to identify potential SRMA's, RMZ, Focus and TMA's, items that are usually considered in the programmatic plan, during the development of inventory used for a site specific Travel Plan. Additionally, it is quite difficult to make such proposals without a good route inventory (in other words, a good idea of what activities are occurring in a certain area). Still, we are working with several individual and organizational members and we believe we can bring some excellent, well-designed proposals to the planning team by the end of December.

BLM must develop a adequate range of Alternatives for the Travel Plan
 BRC supports active recreation management on the CCDO. Insofar as active management of OHV use, BRC strongly supports the “travel limited to designated roads, trails and “managed open areas” paradigm. We also understand that not every area is appropriate for OHV use, and areas need to be provided for non-motorized and primitive recreation opportunity.

What we do not support is being presented with a “range” of management alternatives in a Travel Plan DEIS which all represent a significant reduction in OHV and other recreation opportunity. NEPA and BLM's planning guidance imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. “[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14. The alternatives section is considered the “heart” of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context).

A “pro-recreation” alternative is needed in the Travel Plan

As noted above, the agency must formulate a range of reasonable action alternatives. Given the extensively documented increase in motorized and non-motorized recreation, as well as the importance of public lands in providing recreational opportunity across the West, a Travel Plan that seeks to emphasize and enhance motorized and mountain bike recreation is needed. A “prorecreation” Travel Plan alternative does not diminish the availability of energy and mineral development, hunting, livestock grazing or any other use. Conversely, a “pro-recreation” alternative does not mandate the enhance the availability of energy and mineral development, hunting, livestock grazing or any other use.

One Alternative should include analysis required for special recreation and other permitted events We're repeating ourselves, again, we know.

Our purpose in repeating comments previously submitted is to make certain that important issues and suggestions are considered as the BLM develops inventory and considers alternatives for its Travel Plan. Please forgive.

In our scoping comments, we included this important comment suggesting BLM take advantage of “permitting” recreation activities that require a permit in the programmatic land use plans.

Table A-1
Text of Comments Received

Planning issues and criteria for the Travel Plan

Before we begin, it seems appropriate to note that the BLM has not publicly clarified the inconsistency with the planning issues identified in BLM's planning materials and those identified in the NOI. This is a serious issue we hope the BLM will address.

Perhaps we are misreading the BLM's materials, but those materials that were provided for the public did not adequately distinguish which planning issues and planning criteria were going to be applied to the programmatic planning and which were going to be applied for the site specific travel planning. If the planning issues previously identified by the BLM will be applied to the Travel Plan, we would then like to incorporate our previous comments by reference. If additional and/or different planning issues and criteria will be applied to developing alternatives for the Travel Plan the BLM is obligated to allow the public to comment on those prior to developing alternatives.

We strongly encourage the BLM to identify which planning issues and planning criteria will be applied to developing alternatives for the Travel Plan DEIS.

In addition, when examining the CCDO's preliminary planning issues and national and statewide planning guidance, we find quite a few of them are redundant. For example, management of "special status species" and "rangeland health and vegetation" are directed by existing law, regulation and other statewide planning guidance. In reality, there are really very few, if any, alternatives from which to choose. Controversy over the management of these issues could be described as "moot," at least insofar as the development of the RMP. These are not the best Planning Issues.

The concern our members have is that redundant planning issues serve to diminish the focus on the agency's multiple-use and sustained yield mandate, and, perhaps more importantly, unlawfully narrow the range of Alternatives.

In layman's terms, this is how this works: The agency first takes the existing inventory of roads, trails and areas used for motorized recreation and applies its designation criteria found in regulation and other applicable planning guidance. This is done to minimize impacts to such resources as air, water, wildlife and habitats, vegetation and other natural resources. This usually results in a significant reduction in motorized recreation opportunity. Then the agency develops a "range" of alternatives based on the very same resources and concerns identified in the designation criteria, that have also been included as Planning Issues. Voila! The "range of alternatives" and "decision space" presented to the public drastically reduce the existing motorized recreation opportunity by between 60 – 80%.

Suggested Planning Issues for the Travel Plan

Our understanding is that a significant planning issue is a matter of controversy, identified by the agency, or identified by stakeholders, over resource management activities or land use that is well defined and entails alternatives among which to choose, and may include concerns about potential serious deterioration of public land, significant impacts or conflict, or uses that may or may not be in the best public interest.

Map # = Zones A-3 and B-3

Route # = (see attached maps)

Use = motorcycle events, motorcycle riding, family rides, hiking/backpacking, mountain bike riding, camping

Comment = Missing trails used during motorcycle event in 2007.

Table A-1
Text of Comments Received

Map # = B-3 and C-3

Route # = Attached Maps

Use = motorcycle riding, family rides, hiking/backpacking, mountain bike riding, camping

Comment = Missing trails used during motorcycle event in area in last 10 yrs. I have attached maps.

Our club is actively engaged in fisheries issues, and supports various projects intended to make local fisheries thrive. Toward this end, we would encourage the BLM to improve access to the East Fork of the Carson River between Broken Dam (near Dresslerville) upstream to the California state line. Maintenance and improvement of an access off Leviathan Road near Doud Springs could be the most cost effective. The Carson River provides numerous opportunities for fishing, and specifically, the reach of the East Fork between Hangman's Bridge downstream to the Nevada state line is exceptional. It is managed by the California Department of Fish and Game as a catch and release fishery and produces beautiful native wild trout. The surrounding mountains, forests and meadows provide a wonderful environment for fishermen to enjoy this pursuit. This section, however, is accessed only from Hangman's Bridge by hiking downstream, or by trail from near the Alpine County airport, close to Indian Creek Reservoir. Neither access is easily managed by less than the most physically capable individuals. And, this reach is only fishable by those with California fishing licenses.

The river on the Nevada side of the California border is extremely difficult to access, and is therefore out of reach for many of our anglers. It is out of reach for NDOW to plant fish, and out of reach for our club members to fish. It is out of reach for the type of stream improvement efforts our club likes to support. One of the approaches to improving fish propagation, survival and growth is stream bank stabilization with riparian vegetation. Such plants as willows, cottonwoods, aspen, alder etc provide shade to reduce summer stream temperatures, habitat for the insects which fish feed on, and structure which provide safety for fish in the river. A project to reinforce these features of the river is not possible without better access.

Indeed, at one CFFC meeting, Kris Urquhart, a biologist with the Nevada Division of Wildlife (NDOW), was asked why the river from the California border down to Broken Dam could not be managed as a catch and release trophy trout river. Among the reasons, was the river had inadequate shade, inadequate feed for fish, and tended to become too warm during summer low flow periods, and therefore could not support hold-over fish. Some of these "problems" would seem to be solvable if there could be additional vegetation provided along this section of the river. Our club could sponsor some improvement projects for this reach of the river if access was improved.

We would therefore urge the BLM to include an improved access to the Carson River as a priority for its Travel Management Plan. An access via the Leviathan Mine Rd in Douglas County from the Doud Springs area west to the river would probably be ideal. Any passable route, however, would certainly be welcome.

This page intentionally left blank.