



December 23, 2016

Tongue Ranger District  
Bighorn National Forest  
2013 Eastside 2<sup>nd</sup> Street  
Sheridan, WY 82801

**RE: Public Comments  
Trail #038 Conversion  
Bighorn National Forest, Tongue Ranger District (BRD)**

Dear Responsible Official:

The following public comments are submitted in regards to the **Notice of Proposed Action – Forest Service Trail #038**, on behalf of the Trails Preservation Alliance ("TPA"). The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail riding opportunities.

The TPA does not support the designation of Trail #038 as a non-motorized route and wholly supports those comments submitted by the Blue Ribbon Coalition on or about December 23, 2016. Trail #038 has been a motorized trail asset for many years, and albeit challenging, it has existed in a sustainable state. The TPA, in alignment with our fundamental principles, would support designation of this trail as a "motorcycles only" trail to enhance single-track, multi-use recreational opportunities within the Tongue Ranger District of the Bighorn National Forest. The TPA also contends that the Proposed Action has omitted very important and pertinent information, and that the current version of the Proposed Action is misleading. The TPA is obliged to point out that the outcome of the *Inyan Kara Riders vs., U. S. Forest Service*, Case Number CV-14-159-ABJ (D. Wyo), has not been properly characterized within the background of the Proposed Action and incorrectly represents that Trail #038 is currently closed to motorized use.

The TPA is very much aware that within the Bighorn National Forest, opportunities for single-track, multi-use, motorized single-track recreation are scant and under-served on the Forest. Trail #038 is indeed unique in that it provides riders with a challenging loop. That Trail #038 with proper management, signage and maintenance can continue to provide a recreational opportunity for moderately proficient, single-track users. The TPA would support designation of this trail as a Class 1, "motorcycle only" trail, in lieu of closure and designation as a Class 1, "non-motorized primitive and undeveloped trail". To imply within the Proposed Action that the trail is "unsafe for motorized use", should not be used as criteria for trail closure to motorized use. Per USFS guidance, the agency is not required to guarantee the safety of all trail users. In fact the USFS

is remiss if it does not provide a variety of opportunities for motorized recreation, including single-track trails with varying degrees of challenge.

In conclusion the TPA contends that the Tongue Ranger District must consider a broad range of alternatives, one of which needs to include options for continuing motorized use and access along Trail #038. Designating this trail for "motorcycle use" is absolutely appropriate and highly desired by the spectrum of trail users. The TPA agrees with the Blue Ribbon Coalition and their submitted comments on this project, that designating this trail for motorcycles could be accomplished with relatively little analysis, and if the District does indeed decide to perform an Environmental Assessment, then the District must broaden the scope of the EA to include consideration for enhanced recreational, multi-use opportunities and an expansion of the existing multi-use, motorized route network(s).

We thank you for considering our comments.

Sincerely,

A handwritten signature in dark ink that reads "Don Riggle". The signature is written in a cursive, slightly slanted style.

D.E. Riggle, Director of Operations  
Trail Preservation Alliance