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Sent via U.S. Mail and facsimile to: 202-205-1765

July 28, 2008

RE: TMR Implementation Schedule Concerns

Dear Chief Kimbell and Director Bedwell:

We have received a copy of letters signed by Paul A. Turcke on behalf of Colorado recreational organizations dated March 11 and July 15, 2008, regarding concerns about the agency's Travel Management Rule (Rule) implementation schedule.

The BlueRibbon Coalition (BlueRibbon) is an Idaho non-profit corporation with over 10,000 individual, business and organizational members representing approximately 600,00 individuals nationwide. BlueRibbon members use motorized and non-motorized means, including Off-Highway Vehicles (OHV), snowmobiles, horses, mountain bikes and hiking, to access and enjoy recreating upon state and federally-managed lands throughout the United States, including lands throughout the National Forest System

We join in many of the points raised and respectfully request you and your staff carefully consider those issues. Of primary concern to us is the statement made in your office's response signed by Mr. Bedwell and dated May 29, 2008, which states:

You are correct that we did not establish a regulatory deadline for implementing the Travel Management Rule. However, we none-the-less believe it is important to complete the route and area designations as quickly as possible.

Yes, as quickly as possible – as long as the process is completed in a manner that is consistent with the Rule.

We believe that Motor Vehicle Use Maps generated "as quickly as possible" can only be justified and defended so long as they are generated via a process completed in a manner that is consistent with the Rule. We agree with the observation that some units are ignoring important

provisions of the Rule and using the 2009 “deadline” as an excuse. For numerous and obvious reasons, this is not acceptable to our members and should not be acceptable to the agency.

I have personally visited many of these districts, and have been actively involved in many of the route designations processes currently underway. Based on my experience, I believe that one of the key mistakes that agency is making is to pass up the opportunity the Rule represents to become fully dedicated to a comprehensive recreation strategy. Instead, I have seen many units simply trying to complete what they perceive as a “one time” priority and are merely “checking the boxes” to eliminate cross-country travel.

The Rule is properly viewed as an opportunity to provide for current and future recreational demands, mitigate impacts and leverage existing partnerships and programs for management and monitoring. Sadly, some districts are merely viewing the Rule as a way to eliminate cross-country travel.

Former Forest Service Chief Dale Bosworth stated in a News Release for the Rule “[a] managed system of roads, trails and area designated for motor vehicle use will better protect natural and cultural resources, address use conflicts, and secure sustainable opportunities for public enjoyment of national forests and grasslands.” Travel Management Rule Final Communication Plan, November 2, 2005, p.5. In fact, “it is Forest Service Policy to provide to diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability.” Forest Service Manual 2353.03(2).

But management options that would achieve these goals are being summarily excluded, we believe unlawfully, using a variety of rationales, including but not limited to the 2009 “deadline.” We have literally seen one Ranger District develop alternatives that include designating certain user-created and previously-closed routes, while an adjacent Ranger District refuses to develop any alternative that includes any user-created routes. The latter Ranger District insists that the 2009 “deadline” will not allow formulation of alternatives that would consider user-created routes. These Ranger Districts both have the same “deadline” and the same budgetary constraints.

In our view, the problem here is not simply that there is a deadline. The broader and more troubling problem is that some units lack commitment of personnel and budget to formulate a wide range of alternatives, within the planning process, that would lead to final travel plans that serve the needs of the public while protecting the environment. This lack of commitment to recreation management could pose even greater challenges when we move beyond planning to implementation and maintenance of effective recreation management systems.

If the agency will not consider extending the “deadline,” then it should immediately re-enforce the commitment to utilize staff and budgetary resources from all departments to formulate travel plans in a manner that is at least not inconsistent with the Rule.



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