



THE WILDLIFE SOCIETY
MONTANA CHAPTER

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OHV Plan Amendment
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The Montana Chapter of the Wildlife Society offers the following comment on the 1999 Off-Highway Vehicle Plan Amendment. For the past two years, the Montana Chapter has been working on a project that is directly applicable to management decisions relative to off-highway vehicle use on public lands. The project is entitled, *Recreation in Wildlife Habitat*, and will result in development of :

- a Report that addresses recreation impacts upon five major wildlife species groups (amphibians and reptiles, birds, small mammals, carnivores, ungulates) and provides guidelines for land and wildlife managers to address consequences of recreation related projects in a NEPA/MEPA specific context,
- a Brochure that summarizes content of the Report,
- a partially annotated Bibliography of recreation impact literature that will be available on the Internet.

We are cooperating with your staff to provide extensive wildlife and natural resource information for use in the wildlife chapter of the Environmental Impact Statement. We are confident that your team will fully consider this information as you develop alternatives for public consideration in the EIS.

While the Montana Chapter enthusiastically endorses agency direction to responsibly manage off-Highway vehicle use, we have concerns regarding the ultimate outcome of the current effort, and the resulting management direction that will tacitly be established through new policy. As currently written, the Preliminary Proposal will allow extensive OHV use on all existing roads, trails, "troads" and tracks on public lands. Forest Service and Bureau of Land Management personnel have acknowledged that this level of use would be allowed. The Preliminary Proposal states:

"The Bureau of Land Management and Forest Service propose changing areas that are currently unrestricted for cross-country off-highway vehicle (OHV) travel to a designation that allows for travel only on roads and trails."

This statement misleads readers into presuming that motorized use would be allowed on designated routes. It does NOT say that OHV travel will be restricted to designated routes, but rather that a

“designation” would allow for travel only on roads and trails. ALL roads and trails that currently exist on the landscape would be open for use. The Montana Chapter does not support this approach to OHV “management”.

The Preliminary Proposal goes on to state that a period of 10 to 15 years will be required to complete travel planning, during which time an inventory all existing roads and trails on the landscape would be conducted. This is not acceptable from a resource management perspective. We have been able to compile substantial literature in the course of our project demonstrating that impacts to soils, vegetation, water and wildlife resulting from intensive and extensive motorized vehicle use are degrading the environment. Instead of the proposed 10 to 15 year interim period to inventory roads and trails, we propose that a system of routes be designated for use now, with the caveat that over the next several years as the inventory is completed, a new designated route system for use by motorized vehicles may emerge. An interim system of designated routes, while perhaps not constituting the ideal system, would temporarily serve until a final motorized use system could be designed that considers natural resource needs. We recommend that an interim system of roads and trails be put in place within one year, and that the final system of motorized routes be established within 5 to 10 years.

Executive Order 11644 was issued February 8, 1972, directing all land administering agencies to establish policies and provide for procedures that would ensure that use of off-road vehicles on public lands would be controlled and directed so as to protect the resources of those lands, promote the safety of all users of the lands, and minimize conflicts among the various uses of those lands*.

In the same paper, the author states:

“In the news release of October 4, 1973, the Forest Service announced that by the end of 1976, ORV enthusiasts will know where they can, and can not, use trails and areas throughout the National Forest System.”

Twenty-seven years have passed since this order was issued, yet its intent has not been implemented. Clear, decisive action is important now. Another 15 years to inventory roads and trails, many of which have been created since the Executive Order was issued, would be irresponsible. Means to restrict motorized use to the thousands of miles of roads and trails that exist over the 26 million acres of public land in question, does not exist, so illegal creation of new roads and trails during that time period is a certainty.

Additional concerns regarding the Preliminary Proposal include:

- Baseline information: none would exist if extensive motorized use continues on all existing roads and trails.
- Informed management decisions would not be possible if policy is instituted that prevents obtaining knowledge of the land’s capabilities.
- Optimal health of the land would not be established, and would in fact be sacrificed *a priori* through this amendment. Thus informed decisions about impacts to the land would not be available, constituting a decision with irreversible and irretrievable consequences.

* Davey, S.P. 1974. Off-Road Vehicles: On or Off the Public Lands. Thirty-Ninth North American Wildlife Conference, pp. 367-375.

- Noxious weed infestation would continue unabated if the new amendment is implemented, resulting in impacts to native vegetation, soils and watersheds.
- The Preliminary Proposal would sanction a multitude of roads and trails that were illegally established.
- Since use of any existing track would be allowed, the means to enforce the amendment does not appear to be legally feasible, due to difficulty in ascertaining whether a motorized recreationist driving off an established road, trail or track could contend that the track already existed.

This EIS process is well-suited to address snowmobiling as well. The EIS process is timely and readily applicable to evaluation of snowmobile management. Issues of concern regarding the snowmobile program include: snowmobile program NEPA compliance; method of designation of routes, play areas and unlimited cross-country travel in relation to natural resource concerns; utilization of state funding sources (MEPA compliance in Montana) and how state and federal programs mesh with respect to NEPA and MEPA.

We appreciate this opportunity to comment and look forward to participating and assisting in this process. Please feel free to call upon us.

Sincerely,

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