

INCORPORATION OF UFWDA COMMENTS INTO FINAL RULE

UFWDA comments on proposed rule

Do not allow project manager to Categorically exclude "plan amendment requests" as outside the scope of the project when such amendments are necessary to bring plan into conformance with OHV route designations

Do not allow project manager to limit "TRAIL" designations to vehicles under 50 inches. Trails, not just roads, can accommodate four wheel drive vehicles over 50" in width.

Inconsistent use of term OHV in proposed rule. Requested OHV definition be changed to conform to E.O. 11644.

Request that agency conduct robust route inventory or at a minimum seek public input when establishing the inventory if agency relies on currently existing agency maps.

When evaluating criteria for designation of ROADS, require project manager takes into account both INTENDED and CURRENT Road Management Objectives, giving prime consideration to current RMOs.

UFWDA comment adopted in FINAL RULE?

YES - preamble at page 68268

"If a designation is proposed that is inconsistent with the land management plan, a proposed amendment must be included with the proposed designation so the decision will conform to the land management plan."

YES - preamble at page 68276

"Some routes over 50 inches wide are identified and managed as trails and can accommodate wider vehicles".

YES - Sec. 212.1, 212.5

Changed definition to that requested in conformance with E.O. 11644. Also added ATV to classes of vehicles as requested.

YES regarding public input - Sec. 212.52

The rule does not provide any requirements for an agency inventory but does require public input.

CRITERIA OMITTED - Sec. 212.55(b) and (c)

Omitted the requirement that designations be consistent with Road Management Objectives.

Supporting proposed rule requiring closures only in instances of "considerable" adverse impacts.

Omit the words "contained in a travel management atlas" in the definition of Designated Road, Trail, Area to avoid confusion of the actual timing of "designated" as it relates to agency creation of a use map.

Limit temporary closures to a period of one year. As proposed the agency places no time limit on the length of the closure.

Do NOT commit to a specific time frame for completion of OHV route designations.

Deddefine snowmobile to be less restrictive so that vehicles converted to over-the-snow travel are included

UFWDA desire to participate in Hand Book/Manual changes implementing final rule, specifically:

* guidance for determining whether to designate OHV routes in one or several steps

* guidance for converting roads to trails

* guidance for use of Road Management Objectives in consideration of criteria for designating OHV routes.

YES - Sec. 212.52(b)(2)

In addition to retaining "considerable" benchmark, added requirement that use is "directly" causing such effects.

YES - Sec. 212.1

Omitted "contained in a travel management atlas" from definitions.

COMPROMISE - Sec. 212.52(b)(2)

Final requires closure notice provide estimated duration of closure. Does not precisely limit closure to 1 year.

YES - Sec. 212.50(a)

YES - Sec. 212.1

Name changed to "over-snow vehicle" and incorporated other suggestion.

YES - preamble at page 68267

HB/Manual proposed changes will be open to public comment when published in Fed. Register, a step not customarily taken by USFS.

* guidance for the consideration of some AREAS for OHV use to alleviate our concerns that all cross-country areas will be closed, even those geographically and environmentally suitable for such use.

* volunteer and cooperative agreements to meet resource needs for maintenance and administration of routes designated.

* guidance to avoid marking routes as either closed or open, rather encourage informative markings. AVOID "closed unless posted open" policy.