

This letter is draft for Commission review, comment and finalization, and is prepared for Ed Monnig and will be copied to Nevada's Congressional delegation.

June 26, 2009

Mr. Edward Monnig, Forest Supervisor
Humboldt-Toiyabe National Forest
1200 Franklin Way
Sparks, NV 89431

Dear Mr. Monnig:

The Nevada Board of Wildlife Commissioners wish to thank you for the opportunity to provide comments on the Northeastern Nevada Travel Management Plan and for extending the commenting period. The proposed plan raised many concerns from sportsmen throughout Nevada. These concerns were provided to us and to Nevada Department of Wildlife (NDOW).

We support your efforts to curtail irresponsible off-road vehicle use. Moreover, we are in agreement that the pioneering of new routes is a serious threat to wildlife habitats and other resources. We also realize that the majority of new road building activity has occurred within the last 15 years with the proliferation of all terrain vehicle (ATV) use. For the most part, the U.S. Forest Service (FS) has done a good job of balancing road closures, while maintaining access into important recreational use areas on the Mountain City and Jarbidge Ranger Districts. We would, however, recommend the use of 7.5 minute maps from 1985 in identifying existing roads present prior to the proliferation of unauthorized roads and trails, and that these roads continue to remain open in order to maintain adequate public access.

The Commission finds itself in a position of trying to represent a wide array of sportsmen's desires, while at the same time attempting to maintain a certain amount of trophy quality in our big game herds and generally protecting wildlife resources and habitats. We are also tasked with trying to keep elk herds within objective levels, which requires adequate access to most of the mountain ranges where they are found. One general approach to this travel management plan that we cannot support is the closure of historic roads on FS administered lands behind private lands.

The Ruby Mountains Ranger District has the most restrictive public access on the Humboldt-Toiyabe Forest outside of the Sierra Front. We recommend keeping active historic roads behind private lands, (through which there is no general public access), open. It remains our view that if the public can gain access thru private lands, historic roads on FS administered lands should be available for public motorized use. In a

District with such limited public access, recreational opportunities such as hunting would be greatly reduced by removal of historic motorized travel ways from public use. Public activity behind private lands in the Ruby Mountains, (on a yearly basis), is significant. Many private land owners continue to accommodate requests for access to FS administered lands free of charge. It is our opinion that the FS should be actively looking at building access and connecting routes, not closing them. Should the FS proceed with the closure of these historic roads, the burden of public use (i.e., parking, camping, etc.) will be shifted to the private lands. This shift may make the option of providing access to public lands too great of an impact for the private landowner. Conversely, this approach may provide the impetus for a private landowner to charge for a more limited commodity. It is conceivable that public opportunities for access to public lands may diminish further with this approach.

As previously stated, we support the FS in their efforts to curtail irresponsible off-road use of vehicles and pioneering new routes whether extensions of existing roads or totally off any kind of track. Relative to the considerable and diverse controversy that this Commission has experienced with regard to the Northeastern Nevada Travel Management Plan, we formally request that a full EIS be completed.

For the most part, the FS has done a good job of balancing road closures while maintaining access into important recreational use areas on the Austin and Tonopah ranger districts. We are somewhat disappointed that there was no proposal to rehabilitate any areas where roads are contributing to erosion. The FS is recommending 1,500 new miles of roads and trails which represents a significant loss and fragmentation of wildlife habitat without a proposal to offset any of this disturbance. We expect that another effort will be put forth to address road rehabilitation and relocation following this initial process. We also see a benefit to having the mining exploration activity mapped and identified for this contribution to the disturbance of wildlife habitat. It isn't clear if the FS is keeping track of the exploration as a cumulative impact on forest administered lands.

The Commission considers this as a great opportunity to work together to make the Forest's Travel Management Plan serve the function of providing opportunities for sportsmen and other wildlife enthusiasts, while at the same time protecting wildlife and habitat from the impacts of road and off-road use. The Commission and NDOW are willing to meet with your staff to discuss these issues in greater detail so that our issues are understood and addressed. Please contact us at your earliest convenience to further this discussion.

Sincerely,

Dr. Gerald A. Lent, O.D.
Chairman

cc: Elko, White Pine, Eureka County Commissions

Cover sheet to the federal congressional informing them this is the Commission's Position on the USFS Travel Plan.