

From: [Jennifer Scanland](#)
To: [Jennifer Scanland](#)
Subject: FW: FW: MEETING AUGUST 28, ADDITIONAL MATERIAL
Date: Monday, August 27, 2018 11:25:30 AM
Attachments: [SKM_C30818082711000.pdf](#)

From: Eddie Booth <eddie@visionwestrealty.com>
Sent: Monday, August 27, 2018 10:51 AM
To: Jennifer Scanland <jscanland@ohv.nv.gov>
Subject: Re: FW: MEETING AUGUST 28, ADDITIONAL MATERIAL

Good day to you fellow Nevada OHV Commission Members, Ex Officio Members, Administrators and friends. I received the following email from a fellow sportsman and Back Country enthusiast and thought I would share the "historical" material that was sent to me in reference to item #11 on the agenda for OHV Commission meeting tomorrow: Discussion of large OHV sticker vs street legal. Since I do not have any idea what this Discussion Item will be to discuss with her, in return, I received a history lesson on this issue, in addition to the preliminary discussions and testimony for the OHV Commission back when sportsmen were trying to get the OHV registration bill passed, a primary bottom-line was that ID numbers/letters be highly visible, at least size of motorcycle plate, and on the rear of the vehicle. In an effort to appease this request, I am sharing all the documentation with you with the idea that we will have complete commission consensus on this topic.

Thank you.

Eddie

(ATTACHMENT)

On Aug 22, 2018, at 8:36 PM, karen boeger < > wrote: >>

>> Hi Eddie,

>> I was just looking over the agenda for the next OHV Commission meeting.

>> There is an item re: discussion of large OHV sticker vs street legal, requested by Sue Baker.

>> Do you have any idea the backstory on this?

>> Back when we (sportsmen) were trying to get the OHV registration bill passed, a primary bottom-line was that ID numbers/letters be highly visible, at least size of motorcycle plate, and on the rear of the vehicle. That agreement has eroded over time.

>> Is this another opportunity to do it right this time? Or??

>> Hoping you might have some insight.

>> Thank you! Sure hope you and your family are doing well & scored some exciting tags this season.

>> KB

>>

April 7, 2005

Testimony of Dan Heinz, Sportsman Conservationist, before Senate Committee on Transportation and Homeland Security on **SB400**.

I am a native of the West, have lived and worked in several western states and have lived in Nevada for the last 12 years. My perspective is broad.

I am retired from the US Forest Service and have been responsible for managing intensively used ORV recreation areas near Denver, Colorado, Leadville, Colorado and Butte, Montana.

I wish to support the registration provisions of SB400 and strongly **urge you to require a highly visible license plate** similar to the one now used on street motorcycles.

There is widespread difficulty enforcing basic, responsible use of ORVs. Off designated route travel, ignoring area closures, and trespass on private lands is common. Rules must be observed if the responsible users of ORVs are to be able to continue recreational use of public lands. The alternative is complete closure of large areas to all ORV use.

A readily readable license plate provides ready identification of the ORV user and an avenue for citizens to report violations of regulations intended to promote responsible use of ORVs. *My experience is that a visit from a law enforcement officer instigated by a citizen's report of an observed violation is a most effective means of achieving responsible use of ORVs.*

There is no enforcement as effective as that coming from peers. We could not and would not want to hire enough cops to educate and enforce responsible use of ORVs.

The provisions for establishing a fund for enhancement of ORV opportunities are flawed as written with a stacked committee and lack of priorities for funding needs. In addition it is premature. The US Forest Service and Bureau of Land Management are just beginning planning but do not have basic off road travel restrictions in place yet. Basic ORV management planning must be in place before enhancement of ORV use begins.

I urge you to drop all provisions for collecting and administering an ORV recreation enhancement program.

Dan Heinz

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July 13, 2005

**Testimony before a joint meeting of Forests and forest health and
National Parks subcommittees of the House Committee on Natural Resources.**

First, I'd like to introduce myself briefly. I seem to have been born with a passion for hunting and fishing. Indeed it was this passion that motivated my choice of a career. I graduated from Colorado State University in 1958 with a degree in Wildlife Management and went to work for the US Forest Service. At one time or another I worked at most everything the Forest Service does over the whole spectrum of Multiple Uses. Much of that career was spent on Ranger Districts in the Rocky Mountains of Colorado and Montana.

I have spent my whole life working to enhance or protect wildlife habitat and preserve the hunting tradition. I not only have hunted big game every year since I turned 14 but I have spent wonderful times guiding or otherwise serving people who were just beginning to appreciate hunting wild game in wild places.

I retired in 1983 from my post as grazing, recreation, wildlife staff officer for the Deerlodge National Forest in Butte Montana and immediately became active with various conservation organizations continuing my efforts to assure good wildlife habitats and hunter opportunities on public lands. That work has either been as a volunteer or at minimum wage and continues to this day. Whenever the piggy bank needed help I worked as a guide, packer, and camp jack for hunting outfitters in British Columbia, Montana, Colorado, and Nevada.

I could probably be best described as a sportsman conservationist available to help on public land issues wherever I have something to offer. My wife and I now live in remote rural Nevada.

I am here today as an individual with long experience iterating what I see as basic principals and facts. I will also be expressing my own views.

My testimony will be divided into two segments. First, speaking from experience, and I would like to think, a little wisdom gained as a public land manager I will lay out some principles for ORV management. I have been deeply involved in this issue since the early 70s so I am more than a little excited at this opportunity. Separately, I will speak to experience gained as a lifelong fisherman and hunter.

My most intensive professional involvement with off road vehicle management occurred when I was Acting District Ranger on the South Platte District out of Denver Colorado,

District Ranger on the Leadville Ranger District in Colorado, and as Wildlife and Recreation Staff Officer on the Deerlodge National Forest in Montana.

I have limited the following statements to basic facts, effects, and perceptions as I see them. I think any land manager or member of Congress must consider all of these when dealing with ORV issues on public lands.

PEOPLE

- A significant number of the public enjoy riding machines on their National Forest and BLM lands.
- Many hunters perceive the need for machines to facilitate quick access to hunting and for game retrieval
- Many dirt bike, ATV and jeep recreationists relish the natural values of our public lands and practice responsible riding.
- I think most public land managers will tell you motor recreation advocates are some of the most pleasant people they ever deal with. These same managers may also tell you environmentalists come off as self righteous and arrogant.
- Too many ORV users drive off of designated trails creating damaging renegade routes. Several National Forests have found it necessary to ban or are now proposing bans on ORV recreation. Long attempts to manage use have failed because of renegade riders. (Hoosier, Shawnee, Green Mountain, White Mountain, Monogahela)
- The Congressional Sportsmen's Foundation, from their intensive study of access in Colorado, found "in general, hunters favor more non-motorized access over motorized access. This suggests that for hunters the access issue is not about having "all access to all places." It is more about having "the right access to the right places,"
- Off road vehicle enthusiasts rarely understand the impacts and disruption they cause to non-motorized users and thus propose shared trails. The analogy of smokers and non-smokers is appropriate. Smokers in a room perceive no conflict while the non-smokers find second hand smoke most unpleasant.
- Motorized use completely displaces the traditional non-motorized users. Motorized and non-motorized recreationists simply do not mix. For instance, the Rampart Range immediately west of Denver and Colorado Springs was once a very popular hiking area. No more, hikers must now all go much further west. The Rampart Range has become very popular with dirt bikers.

Dirt bikes and ATVs have completely displaced hikers from the Virginia Mountains and Dog Skin Mountains near Reno, with their tracks cutting the soil every which direction. This is an area where the BLM supposedly limited ORV travel to existing routes years ago. The ORVers pay no attention and go where they wish while the BLM does nothing.

- The 2002 National Visitor Monitoring Report produced by the US Forest Service shows that 10 times as many people go to the Humboldt and Toiyabe National Forests in Nevada to hike, backpack or horseback ride as those who go to the Forest for ATV, Dirt bike or jeep recreation. According to that same survey, nationally, 32,533,500 go to their National Forest to hike/walk while the number for OHV use (which does not include snowmobiles) would be 6,170,500. In other words approximately 4 or 5 times as many go to the National Forest to hike, backpack as those who go for motorized recreation.
- Our population is booming. Crowding is becoming significant even in Nevada. It is basic. The land can accommodate far more people on foot. A hiker needs 4 to 10 miles of trail for a days recreation, someone on a machine requires 30, 40, up to 100 miles of trail to provide a days outing. In addition, the noise produced by motorized users invades a large space wherever they go.
- Many, if not most backcountry ranchers are finding the current invasion of ATVs into their grazing allotments intolerable.

Management Factors

- Non-motorized recreation in undeveloped areas is far cheaper to administer than motorized recreation.
- Motor vehicles are a major factor in the spread of noxious weeds.
- All types of recreation can have detrimental disturbance effects on wildlife. (Montana Wildlife Society) However, ORV recreation has disproportionate effects because each individual user covers so much ground producing noise all the way.
- Motorized recreation displaces wildlife, especially deer and elk. Elk are often forced from public lands onto private when motor vehicle use by hunters is excessive. I have personally witnessed this near Leadville, Colorado and Butte Montana. A serious elk displacement problem caused by motorized hunters on the Routt National Forest in Colorado is documented in Bugle Magazine Sept.- Oct 2002.
- Two miles of road per square mile will reduce elk use by 50%. Six miles of road per square mile will virtually eliminate elk use. (Montana Cooperative Elk Logging Study)

- Hunter satisfaction and success often increase when hunting areas are declared off limits to vehicles. (Montana Cooperative Elk-Logging Study)
- A study of public land in Colorado by the Congressional Sportsmen' foundation showed that between 91 and 97% of all lands were within 1 mile of a mapped road or trail on public lands in Colorado.
- Impacts to the land and other uses by ORVs which are well within acceptable levels at one or two vehicles per day become completely unacceptable at use levels of 20 or 30 vehicles per day.
- With the advent of dirt bikes and ATVs people who have never gotten beyond constructed roads suddenly can and do go everywhere. Too many of these people are backcountry neophytes, causing a great deal of unwarranted damage to the land and conflicts with the traditional hiker or hunter who walked long and hard to get there. ORVs have cost us most of our natural allocation of space to quiet users.
- ORVs are tracking, ripping, domesticating and taming the last of our wild country at breakneck speed, recklessly and destructively without proper thought. The Humboldt and Toiyabe National Forests in Nevada estimate there are six to nine thousand miles of renegade routes that have been created on those Forests by irresponsible ORV users.

Management Suggestions

- Ron Moody, A blue collar sort of a guy with the Montana Wildlife Federation has spent a great deal of time thinking through an appropriate allocation of motor access to hunt. I think he has it right.

"As an arbitrary starting point for discussing road density on public lands I suggest the following: In typical roaded areas of western National Forests and BLM lands, the needs of hunters usually can be served with an average motor vehicle road density of 3-miles to 5-miles between roads. Ninety percent of roaded public lands should be within three miles of a motor vehicle road. Be aware that this density usually means closing a lot of established two-track 'resource roads.' With five miles between roads in most rugged western landscapes people can obtain both practical access and wild solitude within the same management scheme."

- The Ely BLM Field Office here in Nevada is carefully laying out designated ATV touring routes by consulting with every potentially affected interest such as non-motorized recreationist, ranchers, outfitters, soil scientists, wildlife biologists, etc. before any designations take place. They demonstrate that such planning can be done. Sadly they are the exception and it remains to be seen if ATV users to keep to those designated routes. They do not have a very good record of doing this.
- I so often hear that only a few bad apples cause the problems. I can assure you if it is only a few then I do not want to see what happens if there are a lot. The Duck Creek Basin near Ely NV is a mess of renegade routes, displacing elk, ruining the hunt, hiking opportunities, and causing severe erosion. I do not go there any more. I have long hunted the Missouri River Breaks in Montana. ATV use is intruding everywhere. There is no point going to many of our former "favorite spots" which we once shared with others who had walked in like we had. One thoughtless individual intruding into such an area on a machine ruins it for everybody. Now it is usually more that just one machine born "hunter" invading such areas.

Unplanned "play areas" are springing up in Nevada, The Pine Nut Range, Sand Mountain, Wilson Canyon, Fort Smith, and Moon Rocks are unplanned ORV play areas spawning destructive ORV riding into ever widening country. Land destruction seems to be a major recreation pursuit. Managers tell me a culture of deliberate regulation defiance is rampant. Efforts at a management fail miserably. Law enforcement is essentially absent. Limited personnel, a woefully inadequate fine system and most importantly a "can't do" attitude handicap the agencies.

If I see any attempt at regulating use it usually amounts only to a wimpy carsonite sign off to the side of a track saying it is closed. There are a few success stories, very few I must say. The Pike and San Isabel National Forests in Colorado have had great success with steel signs set right in the middle of the road. The Charles Sheldon Refuge in Montana has a very successful, strictly enforced, and popular road management program.

- We need both direction and funding from congress that will assure the agencies first and foremost receive training in how to manage ORV use. They also need an updating of laws and regulations, fines, and of course some increase in enforcement funding.
- No, I did not say ORV development funding. I said enforcement funding. There are tens of thousands of suitable routes out there for touring the public lands. Education of users, enforcement of responsible riding regulations, and restoration of existing damage must have priority over to providing more ORV opportunity.

Personal Experiences and Philosophies

I now wish to hop back and sketch my personal experiences. I came of age in Colorado

Springs just as surplus jeeps were becoming available. Neither my parents nor I could even begin to afford 4x4 of any sort. My buddies and I began backpacking in for our fishing trips, thanks to the cheap army surplus gear then available. Oh, how we envied those who had a 4x4. My best friend's Dad finally was able to get a surplus jeep operating and we had the privilege of driving to many of the spots we had previously been walking to.

Even back in the late forty's and fifties of Colorado, we soon found out the best hunting and fishing was always where it was necessary to walk. At too many areas accessible by jeep we found campsites trashed, the stream banks trampled, game displaced and wild trout simply could not hold up to the fishing pressure. Areas so impacted have increased exponentially over the 50 years since I left for school.

I still gape at the expense that must be involved when I see hunters in a large 6-passenger 4x4 pickup towing a trailer of 4 ATVs. Even a standard pickup with one ATV aboard represents more money than I ever earned in 3/4 a year. The cost of one ATV could cover the cost of an outfitted horse drop camp for several years

I cannot help but feel that recreation pursuits, which are extremely expensive to participate in, and by which even a few participants displace or degrade all other recreation uses are elitist by definition.

Not only is hunting on foot far less expensive than the motorized alternatives it is more productive besides.

I find it difficult to understand why some folks feel access is closed anywhere they are not allowed to take their machine.

Poets and philosophers have been telling us for millennia that obtaining any objective easily, devalues the success. I know from repeated personal experiences that game bagged close to a road and vehicle does not generate near the pleasure of success that game obtained in the out back using muscle power and woodsmanship skills provides.

I still walk to my hunting and fishing. The only areas that I find are free of intrusions by irresponsible ORV users are the Wilderness or roadless areas. I bone my big game on the spot and backpack it out. Not so tough as it sounds. Even a big mule deer buck will provide only about 90 to 100 pounds of meat. Carrying out two loads of 40 pounds or so is not difficult.

I have only one year left to my allotted three score and ten. Reality is that my walking days are numbered. Rented horses will take up the gap for a while, and then there will be the fireside and photo albums. Nevertheless I will dedicate the remainder of my lucid life working to assure upcoming young folks will have the abundance of motor free wild country I have enjoyed through my whole life. Rest assured, you will not hear me asking for motor access to areas I can no longer walk to.

Our American characteristics of self-reliance and "can do attitude" can likely be traced to our recent history of wilderness living. The traditional hunter has carried those traditions to the present by using woodsmanship, self-reliance and physical fitness instead of modern machinery and gadgetry in the pursuit of game.

A quote from Teddy Roosevelt makes an appropriate conclusion.

No one, but he who has partaken thereof, can understand the keen delight of hunting in lonely lands. For him is the joy of the horse well ridden and the rifle well held: for him the long days of toil and hardship, resolutely endured, and crowned at the end with triumph." . . .

I appreciate the opportunity to testify and would be happy to answer any questions.

Joslin G., and H. Youmans, coordinators. 1999. Effects of recreation on Rocky Mountain Wildlife: A review for Montana. Committee on effects of recreation on wildlife, Montana Chapter of the Wildlife Society. (www.montanatws.org)

Lyon Jack, et al. 1985. Coordinating Elk and Timber Management: final report of the Montana Cooperative Elk-Logging study, 1970-1985.

Congressional Sportsmen's Foundation. Hunter Access in Colorado, a federal public lands case study. 2003. www.sportmenslink.org.

Rocky Mountain Elk Foundation. Sept.-Oct. 2002. Road Closures, public input key to managing Colorado herd. Bugle Magazine, p23.

Karen Boeger
5055 Wilcox ranch Road
Reno 89510

- * Retired school teacher
- * Conservation volunteer activist for over 30 years
- * Member of numerous conservation & wildlife groups
- * Past member, BLM Resource Advisory Committee, representing recreation interests
- * Member of RAC sub-committee that developed BLM Statewide ORV Guidelines

Nov. 15, 2005

Comments for the Legislative Committee on Public Lands

ORV REGISTRATION

The current legislation re: ORV registration is highly flawed and largely ineffectual, if my understanding of it is correct.

- Registration is voluntary, not mandatory
- It remains to be determined if the registration numbers will be highly visible
- There is no central data system to record the registration numbers
- There is no provision for ORV ethics education materials

I urge you to re-craft this legislation to create a more meaningful and effective registration system. By doing this, you will provide significant public benefit to all public land users by enabling effective management and the future sustainability of ORV recreation.

Clearly some level of motorized recreation is used by all and compatible with good land stewardship. However, ORV recreation use has far outstripped management capabilities and is now causing unsustainable impacts. An effective registration system would significantly aid management effectiveness.

***Draft ORV registration legislation should be crafted by a democratic and balanced group that would include all public lands users: non-motorized recreationists, wildlife conservationists, sportsmen, historical/cultural conservationists, livestock operators, as well as ORV users and dealers.**

Unmanaged ORV use of public lands affects every public lands user:

Disturbs and displaces wildlife

Disrupts and displaces quiet use recreationists

Ruins traditional hunting opportunities

Causes serious vegetative damage and soil loss

Disrupts livestock operations

Causes loss of cultural and historical resources

Causes loss of opportunity for responsible ORV recreationists

- **The certificate of operation must be a highly visible license plate, at least the same dimension and letter/number size as now required for street-legal motorcycles, to be placed on the rear of the vehicle.**

Citizen reported violations are a most effective enforcement tool. A vehicle ID visible from a distance is necessary for effective peer enforcement. Enforcement is key to reducing impacts and promoting sustainable use of ORVs on Public Lands.

- **There should be only a one-time fee collected at the time of registration, set just high enough to cover the cost of administration and educational materials to be dispersed. Avoid creating a fund which would require a Commission to oversee dispersal.**

Abundant funding already exists for ORV trail development without establishing an additional ORV fund. Question 1 allocated \$63,000 to ORV trail development in '04. Much more will be available. The federal Regional Trails Program distributes over \$661,000 dollars each year in NV. ORV interests compete on an equal basis with other trails groups for both funds.

Nevada should avoid the taxes, complexities, and expenses a fund and Commission would involve by charging only for administrative costs of a registration program. Nevada should benefit from the mistakes of other states. California tried an Off Highway Motor Vehicle Recreation Commission representing only off-road interests to distribute funds for ORV programs. This approach failed in part because ORV interests did not recognize or redress the impacts ORVs have on non-motorized users. In 2002, after lawsuits, CA passed legislation (AB 2274) that, among other things, provided balanced representation on that commission.

During the Off-Road Policy discussion day before yesterday, a statement was made that

“If the off roaders are not given someplace to go, they will go everywhere.”

This certainly sounds legitimate. However, we do not think it is even close to reality. A more accurate predictive statement would be:

“ If we give them a place to go, they will go there and everywhere else too, permitted or not.”

We are not aware of any objective research on any aspect of ORV management, thus all we can do is look at what has happened in other areas and rely on personal experience.

Dan's personal/professional experience goes back to the 70's when The FS was first trying to bring out-of- control motorcycle use on the Pike NF in Colo. under management. He has been working with this issue almost continuously ever since.

Karen has been deeply involved for years here in Nevada, dealing with ORV issues on the Black Rock NCA and she was responsible for a major effort which resulted in the BLM adopting statewide Standards and Guidelines for ORV management..

The ORV people who come forward with very reasonable requests for route designations are some of the nicest, most sincere people we, or the agencies, ever deal with. No question, the ones in Ely are sincere and doing their best to propose a legitimate, low impact system. It is hard not to respond to their seemingly legitimate requests.

If only these mom and pop or family types, who are just out there to tour the wild country, were all we had to deal with.

The reality is that the ORV sport attracts many people who could care less and have the ill-founded notion that they have “rights” to go anywhere. Whether these irresponsible users are a small minority or are really the majority is debatable. What is for certain is that the irresponsible users' impacts are intolerable.

It is reasonable to assume that the more destination opportunities that are created and promoted, the more people will participate, and the more spin-off renegade users we will have to deal with. This has certainly been the experience of many National Forests -- 8 Forests are now closed to ORV travel.

Reality is that the W community packs much more political clout than any other enviro organization in the State. We must absolutely not undercut others' attempts to deal with this issue. The need for compromise may very well eventually emerge. Let's stand firmly behind an agreed-upon position paper until that time is obvious.

Karen and Dan

July 18, 2007

To: Dave Lafevre

From: Dan Heinz with PS from Karen Boeger

Subject: Transportation Management Implementation Plan

Thank you for giving us time to read your plan carefully before commenting.

Bad news first, it seems it needs to be repeated over and over: the NCA is not another National Recreation Area! Any program intended to develop, or accommodate destination ORV entertainment opportunity is out of place and must be resisted.

Motorized touring of the historic, geologic, archeological or other NCA natural features is definitely an appropriate activity and has been supported by all since the beginning. Motorized use within the NCA becomes illegitimate when that use is focused on machine fun, motor sport, thrill riding or whatever you wish to call it.

Of course, it is fully legitimate to tour the NCA on whatever machine chosen. However, the miles of touring routes available must be limited to the minimum necessary for adequate access. Considerable wisdom is needed to decide when too much motor touring opportunity starts to detract from the wild nature of the NCA.

There is a trend to assume that public lands must accommodate any fun activity that manufacturers and users dream up. This is a basic fallacy. The agencies legislated purpose is to protect the land and maintain sustainability for the future. Much of the "demand" from motorcycle and ATV groups is for motor sport activities that are destructive by their very nature. These activities are questionable on any public land, but are absolutely out of place in an NCA.

Also, it is difficult not to assume that much of the motivation for developing such use opportunity in the NCA or elsewhere is to make it easy to say no to motor sport. To be sure, people are easier to deal with if you can offer alternate sites for their motor sport activities. Making it easy to say no is the wrong reason to develop or allow a destructive activity.

All the statistics available indicate the majority of visitors to public lands go there for quiet and for clean air. Noise and dust are incompatible with such visits. Everybody has the right to use the public lands, but nobody has the right to ruin the outing for others. It is likely that we see only ATV users and dirt bikers in some areas simply because the quiet users have been displaced. In addition, people focused on machine challenge and motor sport occupy vastly more space than those simply camping or touring. Crowding will be a rapidly developing issue in the near future.

I must disagree that we need an ATV and/or motorcycle representative on the advisory committee. This would imply a level of legitimacy for their interest, which is largely incompatible with the NCA. It would not be cool to invite a user representative to whom you must consistently say no.

The public involvement, education and constituency building portions of your plan are excellent. ! This is the bulk of your plan and is well thought out.

Now is time to move on this portion of your plan with vigor.

Note: The only scientific studies we can find are from National Forest lands. They show only 2.5% of the visits to NF lands have participation ORV use as their primary activity. Another 3.1% use ORVs incidental to their primary activity(ie. using an ATV to access a hunting spot for hunting on foot). Figures for the Humboldt Toiyabe are close to the National averages. Figures from Off Highway Vehicle Use on National Forests. Southern FS Research Station. 8/5/05.

The percentages are likely different on BLM lands but these NF figures are very strong and the general ratio of use preferences demonstrated likely carries over to all Public Lands.

Dan Heinz

PS from Karen Boeger:

Dan has written these comments as my representative on the field trip where the plan was presented. He got to see first hand some of the problem areas that would be addressed by this plan. I agree with what he has commented above but wish to add a couple of comments:

- Re: kiosks : the sub-committee has many times in the past emphasized that info kiosks should be placed at each of the portals with a big STOP sign to inform visitors that they are entering a special area and must read the info provided. What further info would be provided by kiosks at the playa entry and/or at Soldier Meadows that wouldn't be addressed at the entries? There has been general agreement that kiosks/interpretive signs must be kept to a bare minimum. If there is info that can only be effectively imparted at those extra locations, I could be convinced they are necessary – thus, I would like to know more about rationale.
- Re: loop routes: are the routes proposed all on existing traditional routes of long-standing that have already been designated open (ie. no user-created routes of newer vintage – 20 or less years)? That would be acceptable if so. However, I feel strongly that these “loop routes” must not be advertised as such and/or labeled on any maps as such. Studies have shown that loop routes significantly increase use (and attendant impacts) while not increasing access. Folks have every capability

of "discovering" loop opportunities simply by reading a map -- this would make their experience that much more memorable. Because this is an NCA not an NRA, if loop opportunities already exist = fine, if not, BLM must not feel obligated to provide this type of recreation opportunity.

September 19, 2008

To: District Ranger Ely RD
From: Karen Boeger/Dan Heinz
Subject: Ely RD Draft Transportation Plan EA

General

While the Ely FS RD has made significant progress toward accomplishing responsible route designation, this document falls far short of meeting minimum NEPA requirements. Major additional work is needed. Several route designations are proposed that lack evident reasoning or justification. Most importantly, the decision to designate some areas with dense circle, through, challenging, interesting, routes appears to intended to arbitrarily comply with demands from a small segment of the public with little thought or impact analysis.

This EA provides only a broad summary of effects. Of course general effects are positive. It goes without saying that closing almost any route has overall positive effects. Merely showing that any alternative will be an improvement upon existing conditions does not obviate the need to show why the new plan will *adequately and best* mitigate the impacts of roads and ORVs. The current level of analysis does not fulfill NEPA requirements of taking a "hard look" at environmental impacts. With some exceptions in the recreation section, and they address only recreation issues, this EA fails to provide the route-by-route analysis that can provide basis for good decisions.

Individual motorized routes on National Forest vary profoundly in their many and significant impacts to other resources. Even foot trails can be quite negative. For instance, even foot trails must not cross critical bighorn sheep or elk habitat. Generalized statements, lumping all routes together, simply are not adequate

Close study of proposed route maps was unnecessarily difficult. Ie: Many map numbers do not match locator map numbers, some maps are missing from locator, map numbers are not in logical sequence but jump all over the locator, and some map numbers are in the wrong location on the locator.

The map legends are very confusing, particularly the "Analysis Route" designation. Are these to be added to the system in the proposed alternative or not? What is the difference between green analysis routes and red trail analysis routes? The legend on the Austin-Tonopah scoping maps was more straightforward.

To avoid confusion and comply with popular usage, any route intended for motor vehicles of any kind should be called a road or a route but not a trail.

All current direction and authority that allow, restrict, and prohibit vehicle use off roads on National Forest lands are tiered from Executive Order (E.O.) 11644, signed by President Nixon in 1972, and modified by President Carter's E.O. 11989 in 1977. The Executive orders make it clear, ORV use can be permitted **only** where it does not interfere excessively with other recreational uses or damage natural resources. The district should apply a rigorous science-based set of criteria to their analysis, including a careful analysis of route additions proposed by others such as NDOW.

Cumulative Effects Analysis

Cumulative effects analysis is essentially absent. The Draft does not take a hard look at the potential cumulative impact of a reasonably foreseeable increase in ORV use.

The neighboring BLM is bent on legitimizing destination ORV areas that will likely be adjacent to Ely Ranger District managed lands. For instance, they are currently analyzing continuation of the Silver State Trail. They have also stated they intend to revisit the Lost Ox proposal during their transportation plan EA for the Steptoe valley. Experience in other areas would indicate such developments would greatly magnify the increase in use. Routes, which have limited negative effects under current use, will often have unacceptable effects when traffic increases.

There are proposals for significant industrial development in White Pine County. The EA dodges the likelihood these will bring significant numbers of motor-oriented people into the area, increasing traffic and increasing impacts.

Analysis must consider the cumulative impacts of establishing routes used to connect larger road or trail systems i.e. U59404A and U59723. i.e.: The current recreation map shows a break in U59404A. Continuing this break would not limit motor vehicle access significantly, yet would very likely delay or prevent damaging increases in use. Breaking any circle route would have the same effect. These are perfectly logical and do-able options to minimize the cumulative impacts resulting from ORV use. Such options must be analyzed.

IRA

We urge you to not designate any user created routes in inventoried roadless areas.

Legitimizing a user created motorized route into an IRA is legally questionable. By law, IRAs are special places on public lands: biological strongholds that provide unique opportunities for outdoor recreation and are to be managed for "lasting protection" 36C.F.R.294.10(2001). In protecting these areas, the Forest Service is prohibited from conducting "any road construction" or "reconstruction" in IRAs except as provided in limited exceptions. 36CFR 294.12(2001).

The term "road construction" means and "activity that results in the addition of forest classified or temporary road miles" (36 C.F.R. 294.11)

FS guidance from R4 states the 'motorized trail' classification must not be used simply to avoid designating a road in an IRA. For example: Routes U59105 and U59649 in the GQ unit violate this direction.

Route Density

Circle routes and connecting routes between major roads can increase use dramatically, raising impacts to all resources profoundly. They are more likely to displace wildlife, They do not add significantly to motorized access.

We are particularly concerned about dense route concentrations in the Ward mountain unit, the North Schell Unit NW of Kalamazoo Pass road, the NW corner of the Moriah unit and the NW portion of the White Pine Unit. Circle routes in particular need careful analysis. Circle routes, routes providing "challenge", and areas with dense open routes need route-by-route and cumulative effects analysis before deciding to add any route to the system.

It is likely the users attracted to these special entertainment areas for ORV specialized recreationists will include disproportionate numbers of riders who scoff at off road and other restrictions, thus compounding enforcement needs. Your budgets are extremely restricted and intentionally attracting likely problems is not prudent.

We are not advocating roadless designation for any of the above-mentioned areas.

Recreation

Motorized access to non-motorized recreation, such as driving to a remote camp spot, then hiking, loafing, hunting, fishing, etc. on foot, has been a traditional and accepted use of the National Forest for nearly a century. Motorized recreation, where riding the vehicle is the purpose of the visit, has orders of magnitude more impact on most all resources and other users. ORV recreation is a relatively recent and expensive activity participated in by a small minority of users. This type of recreation is far more costly to administer than most any other recreation activity. The Ely community has repeatedly risen in very strong opposition to BLM proposals to create special "challenging and interesting" ORV areas.

Providing "challenge" as justification for motorized route selection is problematic. This use has far more potential to cause more damage than other uses. It is likely to be located in the rough terrain favored by Big Horn Sheep and other big game animals. The manufacturers are marketing vehicles that can go most anywhere. The fact is - there is essentially nowhere on National Forest lands which can provide challenge to such vehicles without unjustifiable impacts to most other National Forest uses. Catering to such demands for challenge from a tiny minority of Forest users, who have paid big bucks for a machine for which there is no reasonable recreational use, is in effect letting manufacturers determine recreation policy on National Forest Lands. The very nature of challenging routes assures land impacts far exceeding that of normal Forest transportation systems.

In addition, providing special routes for trail machines, used by high-income people who can afford the thousands of dollars necessary to purchase and transport machines is appeasing a very narrow minority often at the expense of the quiet majority. Machine trail recreationists use many times more space; have a far greater impact on all other users, and demand far more law enforcement and other expenses than non-motorized users. Specialized motorized (ATVs and Dirt Bikes) use demands management expense far beyond its' fair share of very limited funds.

In other words, providing special opportunities for "challenging" experience and motorized loop trails, to a very narrow segment of the public requires extraordinary justification. Public "demand" alone is no justification for any use of the National Forest.

Providing a fair amount of SPM opportunity, and traditional motorized access for non-motorized activity, in suitable areas is appropriate and justifiable.

We support your proposal to prohibit off-designated-route travel for game retrieval. The largest of bucks can be boned out at the kill site producing two loads of about 50 pounds. Such loads easily backpacked out even by hunters in less than good condition. An elk can be reduced to 4 or 5 easily carried loads. Hunters in difficult terrain have long subscribed to the ethic "If you cannot retrieve it, do not shoot it." Requests for game retrieval are unwarranted and reveal a lack of the easily learned boning skill or an unwillingness to follow up a kill with reasonable physical exertion. Exceptions to the off-road travel restriction will greatly complicate enforcement and will leave tracks, which may remain in place for decades and will inevitably be followed by the next riders, and the next, and so on.

We support your proposal to prohibit ORV play areas. Such play areas are simply too destructive to the land. Experience in Nevada on BLM lands shows that establishing play areas only creates an attraction which then becomes a center for the spread of lawless cross-country, destructive ORV use. (i.e. Sand Mountain, Wilson Canyon, Ft. Smith, Moon Rocks)

We support those few situations where you do not propose motorized use in Wilderness cherry stems. Cherry stems are sometimes essential, but they were established without adequate reason in others. All cherry stems create significant administrative problems.

Wildlife

Wildlife in general and game in particular are one of, if not the most valued resource on National Forests. The Ely District encompasses some of the most productive wildlife land in this arid, game poor state. All it takes to recognize the value society places on wildlife is a visit to one of the many citizen fund-raising events in Nevada for wildlife benefits. RMEF and NBU attract hundreds and raise hundreds of thousands of dollars to benefit the game animals they so value. Thousands apply for the few permits allowed for any game species. In addition, non-game wildlife are highly valued by most visitors to the National Forest.

Most wildlife is significantly displaced, or otherwise affected by vehicle use. The EA does not even mention this effect nor appear to factor this effect into individual route analysis.

The assessment of impacts to wildlife by the proposed action is particularly inadequate. Almost every new route will have different affects on different species of wildlife. The document offers a prediction of broad benefits with no discussion of predicted impacts of specific new roads. Some roads have high impact and others do not. For instance, the narrative correctly points out that elk calving ranges are critical and vulnerable. Yet it does not indicate which proposed routes might infringe on calving ranges or which do not. Another example: a vehicle crossing high on an open slope will displace game for a far greater distance than a vehicle in dark timber, below the wildlife.

Each route will have varying impacts. However, almost every proposed new route of any significant length has or will displace wildlife. This will become much more significant as motorized use increases. This effect now, and with predicted increases in use, must be analyzed and displayed for each proposed new route before wildlife impacts can be minimized as required by the EOs.

There is extensive peer-reviewed science available, none of which has been cited, which provides information enabling reasonable prediction of impacts of specific roads. Elk and deer have received the most study, but information is also available for neo-tropical birds and many other classes of wildlife. Following are a few recent papers that are not cited in your reference section. NEPA requires you use the latest and best science. The citations have been greatly condensed here.

*Gains, et al.2003; Cumulative effects of motorized and non-motorized routes.

*Stokowski,P.A. and C.B. LaPointe; 2000; Environmental and Social Effects of motorized use.

*Gregg, J.L., 2007; Displacement of elk to private land by ORVs

*Wisdom, M.J.; 2007; Elk Displacement by ATV use.

*Preisler, H.K. et al; 2006, Elk displacement by ATV and other uses.

*Wisdom, M.J. et al; 2004, Elk and deer displacement by ATV and other uses.

*Barton and Jones; Conservation Science. ORV impacts to breeding songbirds in NE California

In addition, some prediction of increased traffic is essential. Routes whose wildlife impacts may be within acceptable levels at this point in time may well be unacceptable under more intensive ORV use or increased wildlife populations. The EA needs to outline a monitoring program management plan to provide for closure of roads that become problematic in the future. The public needs to be alerted to this likelihood now and not surprised by action in the future.

The Soils section outlines some impacts of motorized use but does not mention dust. A recent paper by the USGS documents wind erosion can be very significant on ORV routes even without a vehicle present. Dust magnifies the impacts of ORVs to non-motorized users and wildlife.

Specific Areas:

The following areas are of particular concern:

The density of routes, the presence of loop routes and connector routes are a particular concern in the following areas: Northwest Mt. Moriah, all of Ward Mountain, North of Kalamazoo Road in the North Schells, and the Mt. Hamilton area in the White Pine Range. We are not advocating roadless management for these areas!

The basic concept of providing special routes for entertainment of a small minority of users must be critically examined. (See discussions above, under **Road Density and Recreation**)

The large bench areas NW of the Mt Moriah Wilderness are very open. ORV users can be seen and heard for miles. The circle and redundant routes proposed will attract excessive motor use and not add to motorized access. This is a high quality area for motorized destination camping, picnicking or other quiet uses. Encouraging ORV-oriented use can only deteriorate the experience for the majority of users. Road densities of this magnitude in open country will effectively if not technically remove the area from any classification as semi-primitive. Wildlife will be displaced.

You are proposing a very high concentration of duplicate routes, circle routes. conversion of foot trail to motorized use in an area of significant hiker use, legitimizing renegade recreation created routes and increased administrative problems in the Ward Mountain unit without any analysis showing the cost to wildlife, quiet recreation, and other resources. This is arbitrary.

Las Vegas people are discovering the Grant-Quinn area and use is increasing rapidly. There is the very real possibility of oil and gas development nearby. Predictably significant increases in demand for recreation use makes intense study for each motorized route essential. The Grant Quinn proposal provides loop opportunities that will need special cumulative effects analysis related to the predictable increase in traffic resulting from such designations. The EA says there will be 4.7 miles of route designated in IRA. The maps indicate there will be many more miles than that.

Individual impacts and cumulative effects of these intensive ORV use proposals must be analyzed and alternatives developed which allow motor vehicle access but do not exceed EO thresholds.

Specific route discussions

We highlight a few specific routes. In no way do we intend to imply that all is well with routes we do not detail.

The Aspen Spring (159056) is a very steep, eroding, user created, route that should never be legitimized. District specialists have long advocated for closure (I first heard this from the range con in 1990 and from others since). It is a very short distance from the system road to the top, making an easy backpack or horse access to the camp spot. There is occasional desire for convenient vehicle access for administrative purposes. Administrative only use is the proper designation.

The Silver Creek switchbacks 59492 are caving in rapidly and are redundant to the Silver Creek trail (594580). It is a relatively easy walk down and back out for foot or horse recreation. This route should be closed. In addition, serious consideration should be given to designating all roads upstream from the Silver Creek junctions be designated for administrative use only. These creek bottoms are prime wildlife and quiet recreation areas that will only be degraded by vehicle use. The reasoning presented in the recreation narrative that these access routes improve primitive experiences is absurd and may be miss-stated. Motorized access is the antithesis of primitive experience.

The Mattier creek trail in N Schell Creek is being converted from a foot trail to motorized route apparently to facilitate a motorized circle route without visible analysis. This is arbitrary.

The draft mentions that we requested closure of the Kolcheck basin cherry stem. It does not analyze effects or explain why the decision was made to allow motorized use.

Route U59105 crosses game winter range and segments a roadless area.
Route U59649 bisects a large roadless area and follows a stream.

Sincerely

Karen Boeger/Dan Heinz

To Nevada Assembly Committee on Transportation:

Assembly(women) Carillo, Hogan, Bobzien, Carlton, Flores, Healy, Spiegel, Sprinkle, Swank, Anderson, Hambrick, Hardy, Wheeler and Woodbury

From: Karen Boeger, Board member, NV Chapter, Backcountry Hunters and Anglers

Re: AB 293 (provisions relating to OHV Registration regulations) – oppose

April 3, 2013

Dear Chairman Carillo and Committee members,

Backcountry Hunters and Anglers is a national non-profit conservation organization of outdoor enthusiasts who prize the tradition, challenge and solitude of America's backcountry. We believe the backcountry is the most valuable and healthy wildlife habitat, thus also the best hunter/angler habitat.

NV BHA Board members participated in the many years of contentious deliberations it required to finally come to a consensus with all stakeholders and get the OHV registration bill passed. I'm sure a number of you remember those deliberations all too well. **AB 293 will negate much of the hard work to establish the current OHV registration regulation.**

NV BHA has a vested interest in the effectiveness of the OHV registration legislation. Many of our members own and use OHVs to access the boundaries of our unroaded wildlands to recreate in a traditional non-motor-focus fashion. Yet our recreation experience is impacted by irresponsible and even illegal ORV use. Traditional hunts and the wildlife are disrupted by irresponsible OHV use. Key wildlife habitat suffers negative impacts from OHVs that spread weeds, create unauthorized routes and increase incidence of fire.

Our primary concerns have been for a highly visible ID on OHV vehicles and memorandums of understanding for enforcement between all entities: state, county and federal. These 2 factors are the single most effective ones to reduce the problems and conflicts our members experience on our public lands. Nevada's public lands are vast, enforcement entities are few and far between. Visible ID can assist in citizen reports of irresponsible and/or illegal use of OHVs.

I am writing to express our strong opposition to the numerous negative changes to the existing OHV registration regulations currently proposed in AB 293, as follows:

Sec. 2 , #1: Makes registration a secondary offense, disallowing an officer from stopping a vehicle for non-compliance. This essentially takes all teeth out of the mandate to register vehicles.

Sec. 2, #2: Allows non-compliant people to potentially evade compliance until stopped for some other reason (as, according to #1, they cannot be stopped for non-compliance) and then be given registration application documents. **This will not be effective in assuring that people take the registration of their OHV vehicles seriously, as currently we do for all other vehicles.**

The cumulative potential effect of Sec. 2, #1 and #2 is to render existing OHV registration law irrelevant and thus encourage wholesale non-compliance.

Sec. 2, #2 through Sec. 3, #1 & 2: providing optional OHV registration in the field requires, in turn, the subsequent, numerous and highly complicated provisions related to registration applications: how to track them, follow-up compliance, issue receipts, etc. **We question the cost, effectiveness, fiscal and "manpower" impacts to NDOW and the counties which will be only enforcement entities mandated to provide this service (as per Sec. 2, #1&2) .**

Sec 4, #1: The proposal that all vehicles 500 cc power and below can be exempted from regulation is unacceptable. It is our understanding that the intent was to exclude mini-bikes, yet such vehicles are usually well under 100 cc in power. A large number of off-road motorcycles range between 50cc and

450cc. These are potentially problem vehicles as, due to their small size, they can go nearly anywhere. The ridership of these vehicles tends to be younger, less aware of responsible riding, thus more likely to cause land damage. One reason for registration is to provide \$\$ for restoration of land damage. **Registration of these vehicles will provide tread Lightly Education to those who most need it. This provision as written, is FAR too lenient.** Even small children need to understand the responsibilities of operating a motor vehicle; that even mini-bikes cause damage if used irresponsibly.

Sec. 5: Strips authority from any federal officer to stop non-compliant persons in the field. First, we question the legality of this proposal. Further, the state does not have the personnel or funds to be the sole enforcement entity on public lands. Nevada's public lands are vast; enforcement capability has always been an issue for both the state and feds. Thus, **the intent of the registration legislation was that all entities with LEOs in the field (primarily public land) would have MOUs to share enforcement capability.** This is done in several other western states. **As written, this provision would eliminate that sensible approach.**

Sec. 6, #3 c: Question: does this mean that any person can buy and register an OHV in another state, keep it in NV and never have to register it here, leaving only NV registrants to foot the bill for OHV opportunities and/or redress of damages?

Sec. 6, #4: registration every 3 years is very bad idea. The purpose of the low yearly registration fee in the OHV registration bill was that it not be a burden, yet cover the cost of the program and begin to form a fund. Spread over 3 years, that fee would come to less than \$10. **No one is going to take registration seriously at that amount, the costs of the program would be unsustainable and a fund (for both mitigating impacts and providing opportunities) would not be accruing.**

Sec. 7, #2: The single most important issue for our members is the size of the ID and the location of the sticker. A highly visible ID will reduce the single biggest conflict between motor and non-motor recreationists by enabling effective enforcement and citizen reports of irresponsible or illegal ORV use.

Provision #2 makes no mention of the size of the ID on the sticker. All parties involved in the legislation worked long and hard to come to agreement on this issue. The intent of the motorcycle plate size sticker was not the size of the sticker itself, but the size of the ID. **For visibility reasons, the size of the ID must be, at a minimum, the size of the ID on a motorcycle plate.** Further, this most important detail should be written into the legislation and **not at the discretion of the NCOHV.**

Secondly, **the sticker location should be in the most highly visible place: the rear of the vehicle.** Other states have devised solutions to the concerns for safety and damage to a rear-mount. These include flexible mounts and an exception for removal during races. The **decision for placement** should not rest with the full commission, but **with the NV Sheriffs and Chiefs Association**, with input from the other federal and state enforcement entities. These are the entities that know best what placement location will result in the most effective enforcement and enable citizen reports.

In summary, AB 293 is riddled with so very many problematic provisions, that even if amended, we fear it will still have a negative weakening effect on the existing OHV registration regulations. Please allow this bill to die, it creates more problems than it solves.

Thank you for your consideration of our concerns.

Karen Boeger
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PS. April 8, 2013

We have heard rumors that Assemblyman Hansen has been preparing amendments to this bill, but have seen nothing reflected in the text of the bill to date. Because those amendments are unlikely to be revealed until shortly before the Committee meeting tomorrow, I'm submitting the comments below on what we have understanding those amendments may be:

1. Sec. 4 #1: 500 cc registration exemption changed to 75 cc:

Although an improvement and more in line with the presumed intent of the provision, we are opposed to any exception.

a.) I've personally been witness many times to parents completely ignoring what their children choose to do with these motorized "toys" that can still do land damage and disturb wildlife (and humans) if used irresponsibly.

b.) It seems reasonable that if parents can afford these toys for their kids, they can afford the \$25 to register them or have the child earn the fee.

c.) The Leave No Trace education that is directed to be issued with the registration will have a chance to be read and promote responsible riding.

2. The sticker size reduced, but the ID size remains the same as a motorcycle plate ID:

This would address our concern that the ID itself be at least the size of that on a motorcycle license. The issue of most visible placement remains.

Those are the only 2 changes of which we have heard rumor, leaving all the other unpalatable -- and unworkable -- provisions, any 1 of which would do unacceptable damage to the intent of the existing registration legislation.

4-11-16
Re: AB29

Dear Chairman Carrillo and Transportation Committee members,

I write you to speak both as a board member of The Coalition for Nevada's Wildlife & of the Nevada Chapter of Backcountry Hunters and Anglers, whom I represent on that Coalition.

As background, I, and several of our Coalition board members, participated for 3 legislative sessions in the long effort to craft the OHV registration bill that finally passed. That success was due to a core group of stakeholders from all sides who made hard won compromises providing bill language assurance of balance in both representation & grant awards.

We applaud the forward-thinking action of Governor Sandoval proposed in AB29, placing the OHV Commission under the umbrella of DCNR. Last session, we participated in successfully ensuring the struggling program continued. Housing the Commission in DCNR provides the needed resources, expertise & oversight to eliminate those past struggles. The additional proposals in this bill to simplify & streamline the Commission should result in increased efficiency & productivity. A required compliance report to the legislature will provide needed performance data & should help mollify concerns about the effectiveness of the program.

We heartily support the amendments which:

- * Brings the conservation position description into consistency with that of the Wildlife Commission & State Environmental Commission.
- * Requires adoption of regulations to promote projects both integrating & distributing over multiple grant categories.
- * Providing language to allow grant funding to prevent impacts to sensitive areas &/or wildlife habitat.

All that said, while we do support the amended version of AB29, **we retain reservations about 2 aspects of the original legislation that have been eliminated in this reform bill.**

1.) The elimination of the original stakeholder-created provisions to ensure balance of grant funding: 20% to enforcement, a 30% cap on funding to any other category.

While the amendment in Section 7, directing regulations promoting integrative projects & distribution over grant categories, the word "balance" does not appear in black & white. Thus, we hold our breath & put faith in trust that the stated intent will come to pass. As we all know, administrations & Commissions are subject to change, while laws do not.

2.) The substitution of the Advisory Board with an Ex-Officio non-voting board, of which NDOW is no longer a member. Instead, the DCNR Director **MAY** convene a Technical Advisory Team that the OHV Commission **MAY** consult, with no specification as to what entities would be on the Team.

Stakeholders created the original Advisory Board to provide expertise to ensure that unintended consequences did not occur with any given grant proposal. DCNR assures us that NDOW will be consulted when deemed appropriate. Again, we must rely on trust that this shall occur with every proposal, which is what we perceive as appropriate.

Our concerns for NDOW not being explicitly mentioned in bill language are 3 fold:

a. Any human activity on the land, including motor activity, has an effect on wildlife and wildlife habitat. Thus every project proposal must have the scientific biological expertise scrutiny that only NDOW can provide, as they do with the public lands agency management proposals. Neither the conservation nor the sportsman representatives on the Commission are likely to have the technical & science background to assess potential impacts of proposals. It should not be their job to consult NDOW on every proposal and try to convey that information second-hand to the Commission.

b. NDOW is one of the few enforcement entities out on our vast public lands. Our own sportsmen dollars fund that capability. Stakeholders had agreed that enforcement is a major key to registration compliance, which in turn is a key to the success of the program. Sheriffs & Chiefs appropriately have a Commission position. NDOW should have a formal means of likewise contributing advice.

c. Lacking "balance" in the legal direction to the Commission re: grant funding, NDOW could serve as a conduit to solicit grant proposals in categories key to our constituents: education, enforcement, restoration, habitat protection, signage.

In summation, despite our serious reservations, enumerated above, we recognize the absolute need for this bill to pass in order to continue the positive, productive, steeply upward trajectory the OHV Commission is currently experiencing by virtue of being under the umbrella of DCNR. This is the positive development we have been hoping and waiting for for far too long. Please do pass this bill speedily.

Karen Boeger
Board member:
Coalition for Nevada's Wildlife
Backcountry Hunters & Anglers, NV Chap.