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08/16/2010 04:32 PM

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cc

Subject: TRU Trails

Damon:

I missed one. Please post the attached letter on the ORV Committee web site asap so the Committee can review it before Tuesday meeting.

Thanks



Lyle Pedro 55 Miles Turner River.html

August 14 2010

Ref: Turner River ORV Trails

Superintendent Ramos:

In an e-mail I received from you on August 14 you stated " Please remember that the public's request for TRU trails was far greater in miles than what we can implement in accordance with the ORV plan". This statement is incorrect. There is no maximum mile limit nor any limit on number of individual secondary ORV trails in the ORV plan. The only limit is the 140 miles of Primary trails which you appear to be trying to cut back to 130 miles.

I will remind you Pedro that early in the ORV Advisory Committee process in a phone conversation I had with you I stated that due to the illegally implemented 140 miles of Primary ORV trails allowed in the TRU the only prayer we have of developing anything near a reasonable ORV trail system was for you to make sure the ORV Committee clearly understood from you that they could and should follow the secondary trails guidelines as stated in the Plan which is [1] No total mile limit of secondary trails [2] no limit on the number of individual secondary trails and [3] individual secondary trails could extend up to One and One Half miles off Primary trails. This One and One Half mile number was quoted to us by an NPS staff official and discussed openly in several ORV Committee meetings. If this formula had been used at least Three Quarters of the trails requested by the public in the TRU could have and should have been implemented. This secondary trail guideline was not followed by the ORV Committee nor the TRU sub Committee resulting in the ORV trail quandary we have in the Turner River unit today. Even having the ORV Advisory Committee to place the bulk of the blame on, it is going to be tough for the Park Service to explain how 300 plus miles of trails requested in good faith by the public were diluted down to 55 miles of trails.

In this same August 14 e-mail Pedro stated "Decisions on which ones [trails] to select were made with input of the ORVAC members together with our [NPS] best judgement and based on best available information"

Here is the problem with this NPS statement involving elimination of ORV trails

1. "With input of the ORVAC members" The ORVAC members were charged only with suggesting trails to the NPS, they had no input nor involvement in final ground truthing of trails therefore they had nothing to do with the trails being reduced to only 55 miles from the 110 miles the Committee recommended.

2." Based on best [NPS judgment" Trails can only be eliminated with Science Based cause not NPS best judgement.

3. "Based on best available information" Unless the Park Service can produce Science Based justification for eliminating any trails as in direct and immediate threat to flora and/or fauna etc. those trails will have been improperly eliminated. The public bears no fault in the fact that there is likely no science based data exists, therefore no trail should be eliminated without good current science based data.

Regardless of how it happened the 300 plus miles of TRU trails requested by the public were reduced by the Committee to the 110 miles recommended to the Park Service by the ORV Committee. Be that as it may, the ORV Committee along with the Public need to be sure we end up with at least the recommended 110 miles. Any trail properly eliminated with science based cause as being Unsustainable should be replace with a trail of equal distance as to end up with the 110 miles recommended by the Committee.

The question keeps popping up in the back of my mind. If the Park Service did not have the ORVAC to place the bulk of the blame on, I have to wonder if we would be looking at only 55 miles of secondary trails in the Turner River unit. I am not faulting the bulk of the ORV Committee members. I am faulting the biased Federal system.

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