



## *Citizens for Sustainable Off-Roading*

The proposed Border to Border route (B2B) is a designated 900-mile route for OHVs on (mostly) unpaved public roads. The route would cross the entire state from the North Dakota border to the shores of Lake Superior including a number of US Forest service roads. Although the exact route is not yet finalized, there are a number of concerns that have already been raised.

- There currently are not adequate funds set aside to deal with road maintenance. One county (Clearwater) has issued an official Resolution of Opposition and requested the route be diverted around it, to protect its taxpayers.
- The proposed route, as shown on draft alignments, would affect wetlands and MPCA ranked *Exceptional* waterways, due to cumulative increased OHV traffic on unpaved roads. The US Fish Wildlife Service itself wrote to the DNR warning of the impacts of a designated route having the potential to result in a significant increase in traffic with vehicles traveling in large packs and caravans.
- The proposed route would take vehicles through a number of areas with known invasive species raising the likelihood of further spreading these harmful species across the state. No funds are set aside to monitor and manage an increased spread of invasives.
- This would include introducing new plant species to the shrinking number of lakes that are home to our protected wild rice.
- No funding for additional law enforcement officers or for dust pollution control on routes with residents.

We share and understand the desire of those looking for new ways to connect with Minnesota's wonderful natural landscape, but at this time we are fearful the proposed Border to Border route has the potential to do more harm than good. Before ANY route could be signed, mapped and promoted it is essential that the State:

- Has adequate resources to first repair and then maintain the roads along this route. (*To gravel just 50 miles, 1/18th of the route, costs approximately \$496,000*).
- Can protect ALL the impacted waterways and wetlands.
- Can mitigate the impacts of invasive species.
- Can respect and protect tribal lands.
- Can add enforcement officers to monitor the 900-mile route.
- Can provide financial assurance that allows Counties quick access to funds to repair and restore damaged routes.

At this time it is hard to see how the 900-mile route across the state will garner enough visitors to create meaningful economic impact and adequately maintain the roads and protect waterways.

**Under current law, any highway licensed OHV that would use the proposed route can already access these roads in a dispersed, sustainable manner.**

Supporting existing closed courses with multiple route options, technical aspects and challenges is a better investment of state dollars than the current proposed 900-mile route that would be nearly impossible to properly manage and protect.

**BELOW ARE EXAMPLES OF EXCEPTIONAL WATERS, AS DESIGNATED BY THE MN POLLUTION CONTROL AGENCY TO BE OF HIGHEST IMPORTANCE FOR PROTECTION STRATEGY, THAT WOULD BE IMPACTED BY THE PROPOSED B2B ROUTE. THESE ARE IN THE LAKE SUPERIOR NORTH WATERSHED. THESE EXCEPTIONAL WATERS ALL DRAIN INTO LAKE SUPERIOR AND SOME INTO THE BOUNDARY WATER LAKES, BOTH RANKED AS OUTSTANDING RESOURCE VALUE WATERS.**

#### **LAKE SUPERIOR NORTH WATERSHED**

##### **PIGEON RIVER SUBWATERSHED**

**Swamp River** crossed by the Route on Otter Lake Rd. Also, it appears that tributaries of the Swamp river are crossed by the Route in two locations on Jackson Lake Rd. **Portage Brook** crossed by the Route on Otter Lake Rd.

##### **BRULE RIVER SUBWATERSHED**

**Brule River** crossed by the Route on FS 309, near the Gunflint Trail.

##### **DEVIL TRACK RIVER SUBWATERSHED**

**Elbow Creek** crossed by the Route on FS 154 Pine Mountain Rd.

##### **CASCADE RIVER SUBWATERSHED**

**Cascade River** The Route crosses the Cascade River and also closely parallels it for several miles on FS 158.

##### **POPLAR RIVER SUBWATERSHED**

**Mistletoe Creek** crossed by the Route on Mark Lake Rd./ FS 161.

##### **TEMPERANCE RIVER SUBWATERSHED**

**Upper Temperance River** crossed by the Route at the intersection of FS 170 / The Grade and FS 339.

##### **CROSS RIVER SUBWATERSHED**

**Wanless Creek** crossed by the Route on FS 170 and again on Cook County 7.

#### **RAINY RIVER WATERSHED**

##### **LOWER STONY RIVER SUBWATERSHED**

**Stony River** crossed by the Route near the intersection of MN HWY 1 and FS Lake County 2.

**Denley Creek** A tributary of Stony River downstream from where it is crossed by the Route.

##### **MITAWAN CREEK SUBWATERSHED**

**Mitawan Creek** crossed by the Route on FS 173.

**Jack Pine Creek** crossed by the Route on FS 371.

##### **ISLAND RIVER SUBWATERSHED**

**Arrowhead Creek** crossed by the Route on FS 380.





CLEARWATER COUNTY  
RESOLUTION: 03132018  
"BORDER TO BORDER (B2B) TRAIL"

A motion was made by Commission Newland, and seconded by Commissioner Nelson, and carried, to pass the following Clearwater County Resolution.

**WHEREAS**, The Clearwater County Board of Commissioners serve as the Road Authority for all County State Aid and County Aid Roads in Clearwater County and,

**WHEREAS**, The "mandate" from the Minnesota Legislature to develop "Border to Border Trail" as presented in publications and meetings, appear to be an overstatement of the actual language in the MN Statute which refers to an appropriation to "address off-road vehicle touring routes and other issues related to off-road vehicle activities" and,

**WHEREAS**, Phase One of the project focuses on Public Roads, Phase Two will add "challenge loops" that extend into environmentally sensitive areas that include challenging barriers for drivers and rough terrain subject to erosion, and the spread of invasive species, and

**WHEREAS**, Department of Natural Recourses spokesperson Mary Straka, stated that they were looking for a scenic adventure "trail". She further emphasized the ideal route would be rugged, unpaved, low-maintenance roads, with obstacles like roots, trees, rocks, to encourage slower speeds, and

**WHEREAS**, Enforcing legal and responsible use of public roadways by Off Highway Vehicles may not be possible with the resources available to County Government. Self-policing is unlikely to be successful because of the nature of the Border to Border Trail activities, and

**WHEREAS**, The additional cost for road maintenance and repair would be significant for Clearwater County and while there is proposed provisions for repairs it seems doubtful that Clearwater County would be made whole.

**NOW THEREFORE BE IT RESOLVED**, That Clearwater County is opposed to the Border to Border Trail, because of the potential cost this trail could have on the Taxpayers of Clearwater County due to the, repairing of roads, cost of Public Safety, and

**BE IT FURTHER RESOLVED**, We respectfully request that the portion of the Border to Border Trail drafted for Clearwater County be abandoned or rerouted.

\*\*\*\*\* Certification\*\*\*\*\*

I hereby certify that the forgoing is a true and correct copy of a motion presented to and adopted by the Clearwater County Board of Commissioners at a duly authorized meeting thereof, on the 13<sup>th</sup> day of March 2018 as shown by the minutes in my possession.

  
Emily McDougall, Board Coordinator



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
5600 American Boulevard West, Suite 990  
Bloomington, Minnesota 55437-1458



Received

March 6, 2017

MAR 10 2017

Minnesota Department of Natural Resources  
Ms. Mary Straka  
Division of Parks and Trails  
500 Lafayette Road  
St. Paul, MN 55155-4040

DNR Parks and Trails  
Central Office

Dear Ms. Straka:

The U.S. Fish and Wildlife Service (Service) has recently become aware of a proposal by the Minnesota Department of Natural Resources to develop a continuous off road vehicle route identified as the Border to Border Off-Road Vehicle Trail. We understand that the proposed trail will utilize existing national, state and county forest roads as well as other public trail and road systems across the northern third of the state and is intended to provide expanded recreational opportunities for individuals operating licensed four-wheel drive and off-road registered vehicles. It also appears that the proposal includes the designation of "loops" or other destination specific routes off the core trail that will access tourist destinations and locations of interest.

The Service administers several National Wildlife Refuges and numerous Waterfowl Production Areas within the state and many are located geographically within the preliminary project boundary. These lands are managed as part of the National Wildlife Refuge System and have been acquired to conserve wildlife, protect critical habitat, and support wildlife dependent public recreation such as hunting, wildlife observation and photography.

While the Service is very supportive of opportunities to promote outdoor recreation, the potential for the proposed project to conflict with priority recreational uses on National Wildlife Refuge System lands appears plausible and may even detract from or negatively impact recreational opportunities for the visiting public. Careful planning and foresight will be imperative to avoid potential conflicts.

The Service recognizes that the intent of the trail is for light trucks and jeep-type vehicles however, current state designation of off-road vehicles (ORV) is much broader and may include certain Utility Task Vehicles (UTV). While most public roads on or near Refuge System lands are open to licensed motor vehicle travel, designation of a trail has the potential to increase visitor conflicts by substantially increasing traffic and consolidating travelers into larger packs or caravans. In addition, the use of ATVs and UTVs on National Wildlife Refuges and Waterfowl Production Areas is prohibited.

We appreciate the opportunity to provide comment and suggestion to inform the planning aspects of this project and enhance the enjoyment of all visitors to National Wildlife Refuge System lands in

Minnesota. We would appreciate opportunities to provide additional comment and suggestions as future drafts become available. If you have specific questions regarding this letter or Refuge System lands within the project corridor, please do not hesitate to contact Mr. Neil Powers, Project Leader, Tamarac National Wildlife Refuge at 218/844-1752. Thanks in advance for your cooperation.

Sincerely,

Thomas Kerr  
Refuge Supervisor, MN, IA