



WASHBURN COUNTY FOREST

FOREST ADMINISTRATOR

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2016 ATV PROJECTS – REQUEST FOR ADDITIONAL INFORMATION ORV COUNCIL

The Off-Road Vehicle Advisory Council raised numerous questions relating to Washburn County ATV project applications. Please accept the following responses in order of requests presented by the Financial Assistance Specialist.

WILD RIVERS REHABILITATION

- 1) *“Have you considered applying for Recreational Trail Aids grants also?”*
No – we applied for RTA funds on other projects
- 2) *“Can you get a series of photos or video of trail sections to show why you need gravel?”*
See attached photos marked Document #1. These are photos of past issues on the trail.

The Wild River Trail is the 40 mile rail corridor running north and south through the County. A majority of this rail grade is elevated with imported material. The composition of the grade is primarily sand with numerous areas containing buried tie dumps and other materials.

The trail also has areas of long gradual grades. When traffic ruts or side berms are created berms along the trail, water has a tendency to saturate these soils during heavier rain events and we have experienced large quantities of fill sloughing off the sides of the trail. A high clay content (Dot grade 3) gravel “caps” the sand surface with a semi-impervious layer. This gravel allows the grade surface to be maintained in a way to properly manage water run-off

The Wild River Trail was re-surfaced in 2003. Over time, gravel is pushed off the trail by ATV use and is also driven into the sand sub-surface. We are hoping to add new gravel on the entire surface using a phased approach to grant applications. We plan on 5 mile segments to complete the gravel cap over an 8 year period. Two sections are complete to date.

Additional gravel will eventually be needed on the entire 40 mile rail corridor. To date, 10 miles are completed. The 2 worst segments have been completed and *Washburn County is willing to withdraw the application for 2016 and hold it for the 2017 grant cycle.*

CASEY LOOP TRAIL

1) *“Are the road routes already in place to connect the Wild Rivers Trail?”*

Yes. There are numerous route options already in place to connect the Wild River Trail, at Trego, with the Casey Loop Trail.

All town roads in Trego are designated as routes. All blacktop town roads in Casey are designated as route. The Town of Spooner has some routes open and we are waiting on verification of one connector option that would link to the north side of Spooner. **See attached map marked Document #2**

If the project is funded, Washburn County will select the safest and most efficient route combination to include in the official Washburn County recreational trail map.

2) *Can you video the project to show the need for gravel?*

Yes we could, but we elected to submit photos for documentation. Attempts to video over 20 miles of trail project proved to be difficult and did not effectively represent the project. We request that the Council accept the following narrative and photo documentation.

The Casey Loop ATV Project would create a major connection from Washburn County to the Burnett County trail systems. The project area lies in the Northwest Sands Landscape, a landscape defined by the underlying sand soils. The project includes a combination of new trail construction, upgrades of existing logging trails, and County Forest Roads (Troute) with existing (and some planned) gravel surface.

The gravel components within the project application are proposed for sections of new trail and trail re-construction. There are 9.41 miles of summer ATV trail proposed within the application. 70% of these miles lie on soils classified as Menahga sand (soils coded as 100B, 100C, 100D – alphabetic code differentiates slope). **See attached Document #3.** Menahga sands contain a typical profile of pure sand to a depth of 80 inches, as referenced on the USDA NRCS Web Soil Survey and described on the **attached Document #4.** This same NRCS database also provides soil suitability ratings for various activities. There are no ratings for ATV trails, but the soil survey does provide a rating for off-road motorcycle trails, which is assumed to be a valid comparison for ATV trails. It describes these soils as having a very limited rating for motorcycle trails with a rating reason listed as “too sandy”. **See attached Document #5.**

Our experience shows us that when these soils are disturbed, especially by motorized travel, they become very loose and unstable. Braking and steering on these soils with an ATV, or even a pickup, can cause the front wheels of the vehicle to dig into the soft material, throwing the center of balance forward. This instability has the potential to cause loss of control, roll overs or other accidents.

Continual motorized use throws material off the trail surface. As these trails are smoothed and graded, the materials also tend to pull away from the surface. Over time, trail surface tends to drop substantially below the existing grade lines. **See attached Document #6.** This photo is of a town road where grading occurs on a routine basis. The cutting and loss of soils is evident in this picture. The unstable nature of these soils results from the 80 inch deep sand profile that contains no binding materials. Gravel caps are necessary to maintain a safe trail system. In order to manage a trail surface on this soil type, a higher clay content gravel cap is needed to stabilize the trail area.

30% of the new trail and trail re-construction areas lie on either Mahtomedi loamy sand (383C) or Graycalm-Menahga complex (439C). Both of these soils types contain a loamy sand component, which typically contains more “binder” material. **See attached Documents #7 & #8.** These soil types offer more of an opportunity to maintain motorized trail systems on native soil surfaces. The NRCS Web Soil Survey reference lists the opportunity for off-road motorcycle trails as being “Somewhat limited”. Again, using the rating for motorcycles is presumed to be illustrative of ATV trail development since no such rating exists. **See attached Document #9.**

The grant application for this project included analysis of the soil data in this area and the gravel quantities were calculated using a basis that the Menahga Sands portions would need full gravel surface while the other soil types may only require spot applications over time (using annual maintenance funding). The available soils information seems to accurately explain the reasons for the difficulties we’ve faced trying to maintain forest roads in this area on native soil surfaces. The gravel quantities applied for were not derived randomly or without purpose. Calculations were made based on careful analysis of soil profiles and characteristics from several sources. These soil properties were measured against our experiences working in these soils types.

A majority of the planned trail surface is currently designated as funded snowmobile trail and is graded at least annually. These trails see a minor amount of motorized use during non-frozen conditions. The attached trail photos illustrate a condition with annual grading and minimal motor vehicle use.

Designating this trail surface as an ATV trail will result in a tremendous increase in use and corresponding damage. The gravel quantities applied for in this grant application were not intended to repair existing damages but rather reduce the probability of future damage from increased use. We firmly believe the Soil Survey data for these soil types justify our project plan.

Please refer to the attached **Document #10**, which serves as an index to photo locations and also a set of 28 images of various portions of the trail project.

- 3) *Are all roads open to ATV traffic in project area and Towns that the project will be and connections.*

Route connections answered above.

Most forest trails in forest units surrounding the project are open to motorized use. ATV use is widespread throughout these units, but we do not see any concentrated use on any particular trail. Designating these forest trails as ATV Trail will significantly increase use and corresponding damage.

- 4) *On Deer Lake Fire Lane where it goes from route to Troute, explain how this is a Troute.*

This segment Connects to Lower Makenzie Lake Road and other route segments connecting to the Village of Trego, where gas, food and services are provided. See Attached Documents #11 & #12

- 5) *Is the connection to Burnett Co, by route, Troute or trail?*

Burnett Co. information available on the companion application for new trail miles submitted this same grant cycle by Burnett Co.

Respectfully submitted for your review.

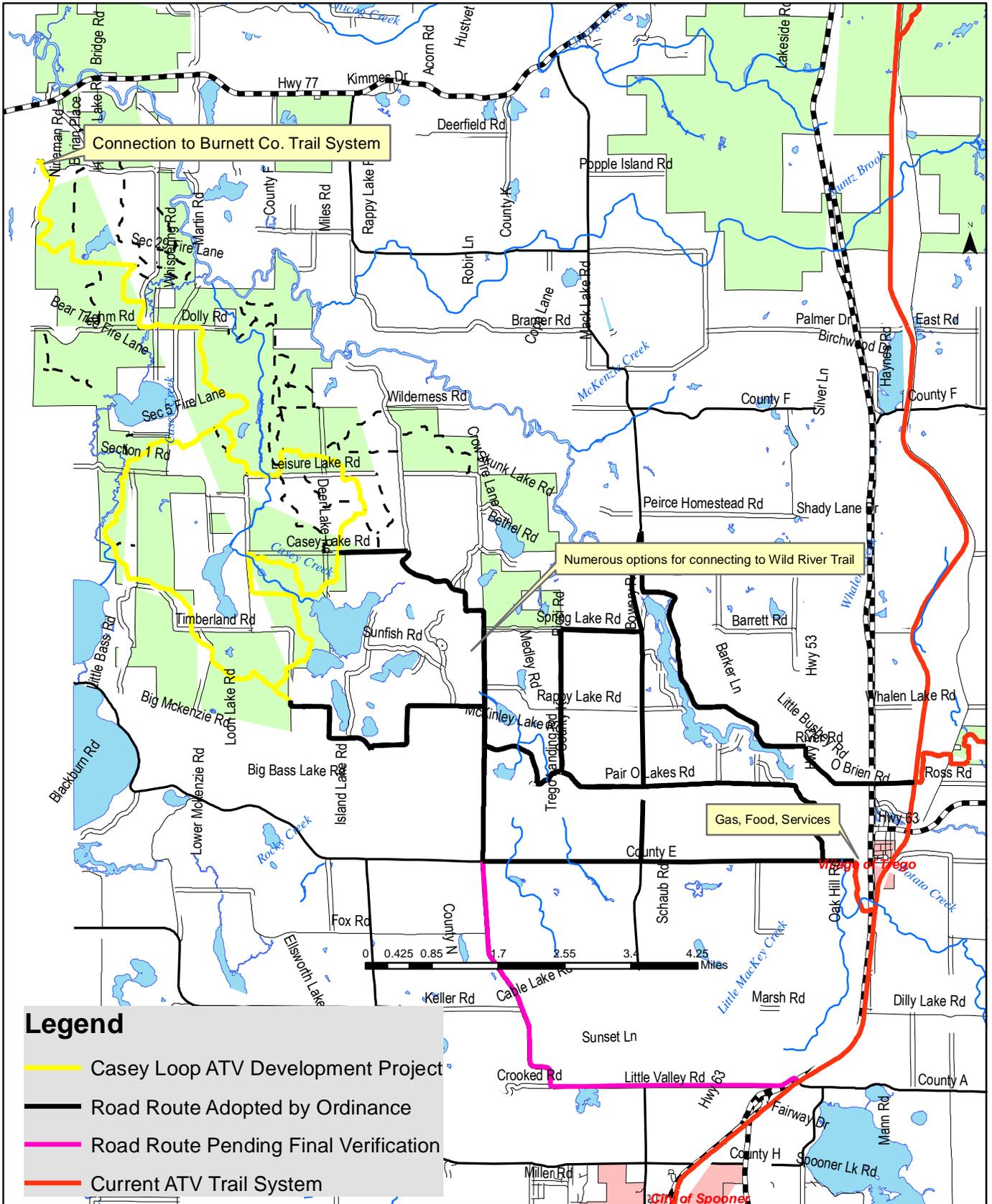
Michael Peterson
Washburn County Forest Administrator.

DOCUMENT #1 – WILD RIVER TRAIL

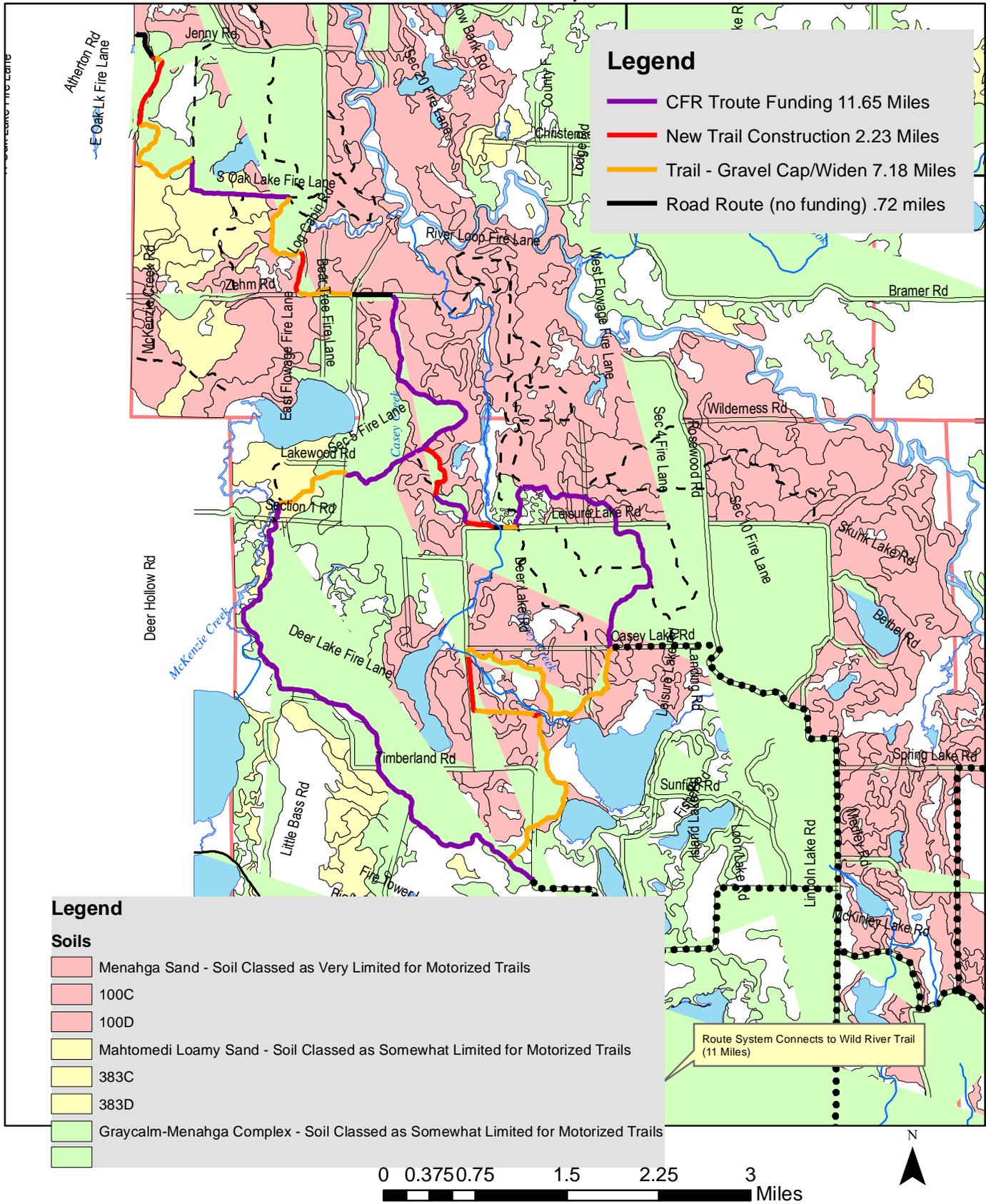


DOCUMENT #2 – CASEY LOOP ROUTE CONNECTIONS

Casey Loop ATV Development
Route Connections



Casey Loop ATV Development Overview Map



DOCUMENT #4

Map Unit Description: Menahga sand, 6 to 12 percent slopes--Washburn County, Wisconsin

Washburn County, Wisconsin

100C—Menahga sand, 6 to 12 percent slopes

Map Unit Setting

National map unit symbol: gm4m
Elevation: 670 to 1,600 feet
Mean annual precipitation: 27 to 33 inches
Mean annual air temperature: 36 to 45 degrees F
Frost-free period: 88 to 150 days
Farmland classification: Not prime farmland

Map Unit Composition

Menahga and similar soils: 88 percent
Minor components: 12 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Menahga

Setting

Landform: Outwash plains
Landform position (two-dimensional): Shoulder, backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Linear
Across-slope shape: Convex
Parent material: Sandy outwash

Typical profile

O_i - 0 to 1 inches: slightly decomposed plant material
A - 1 to 2 inches: sand
B_w - 2 to 25 inches: sand
C - 25 to 80 inches: sand

Properties and qualities

Slope: 6 to 12 percent
Depth to restrictive feature: More than 80 inches
Natural drainage class: Excessively drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): High to very high (6.00 to 20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Available water storage in profile: Low (about 3.8 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 6s
Hydrologic Soil Group: A
Other vegetative classification: Low AWC, adequately drained
(G090AY002WI)

Sanitary Facilities	② ③
Soil Health	② ③
Vegetative Productivity	② ③
Waste Management	② ③
Water Management	② ③

0 400 ft
Warning: Soil Ratings Map may not be valid at this scale.

Tables - Off-Road Motorcycle Trails - Summary By Map Unit

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
100B	Menahga sand, 0 to 6 percent slopes	Very limited	Menahga (89%) Friendship (10%)	Too sandy (1.00) Too sandy (1.00)	34.3	23.6%
100C	Menahga sand, 6 to 12 percent slopes	Very limited	Menahga (89%) Friendship (10%)	Too sandy (1.00) Too sandy (1.00)	72.6	49.8%
100D	Menahga sand, 12 to 30 percent slopes	Very limited	Menahga (95%)	Too sandy (1.00)	37.2	23.6%
439C	Graycalm-Menahga complex, 6 to 12 percent slopes	Somewhat limited	Graycalm (55%) Maklomeel (5%) Gretlum (3%)	Too sandy (0.30) Too sandy (0.72) Too sandy (0.85)	1.5	1.1%
Totals for Area of Interest					145.7	100.0%

Table - Off-Road Motorcycle Trails - Summary by Rating Value

Rating	Acres in AOI	Percent of AOI
Very limited	144.2	98.9%
Somewhat limited	1.5	1.1%
Totals for Area of Interest	145.7	100.0%

Description - Off-Road Motorcycle Trails

Off-road motorcycle trails are intended primarily for recreational use. They require little or no site preparation. They are not covered with surfacing material or vegetation. Considerable compaction of the soil material is likely.

The ratings are based on the soil properties that influence erodibility, trafficability, dustiness, and the ease of revegetation. These properties are stoniness, slope, depth to a water table, ponding, flooding, and texture of the surface layer.

The ratings are both verbal and numerical. Rating class terms indicate the extent to which the soils are limited by all of the soil features that affect the specified use. "Not limited" indicates that the soil has features that are very favorable for the specified use. Good performance and very low maintenance can be expected. "Somewhat limited" indicates that the soil has features that are moderately favorable for the specified use. The limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected. "Very limited" indicates that the soil has one or more features that are unfavorable for the specified use. The limitations generally cannot be overcome without major soil reclamation, special design, or expensive installation procedures. Poor performance and high maintenance can be expected.

Numerical ratings indicate the severity of individual limitations. The ratings are shown as decimal fractions ranging from 0.01 to 1.00. They indicate gradations between the point at which a soil feature has the greatest negative impact on the use (1.00) and the point at which the soil feature is not a limitation (0.00).

The map unit components listed for each map unit in the accompanying Summary by Map Unit table in Web Soil Survey or the Aggregation Report in Soil Data Viewer are determined by the aggregation method chosen. An aggregated rating class is shown for each map unit. The components listed for each map unit are only those that have the same rating class as listed for the map unit. The percent composition of each component in a particular map unit is presented to help the user better understand the percentage of each map unit that has the rating presented.

Other components with different ratings may be present in each map unit. The ratings for all components, regardless of the map unit aggregated rating, can be viewed by generating the equivalent report from the Soil Reports tab in Web Soil Survey or from the Soil Data Mart site. Onsite investigation may be needed to validate these interpretations and to confirm the identity of the soil on a given site.

Rating Options - Off-Road Motorcycle Trails

Aggregation Method: Dominant Condition

②

DOCUMENT #6



DOCUMENT #7

Map Unit Description: Mahtomedi loamy sand, 6 to 12 percent slopes—Washburn County, Wisconsin

Washburn County, Wisconsin

383C—Mahtomedi loamy sand, 6 to 12 percent slopes

Map Unit Setting

National map unit symbol: gm5k
Elevation: 670 to 1,600 feet
Mean annual precipitation: 27 to 33 inches
Mean annual air temperature: 36 to 45 degrees F
Frost-free period: 88 to 142 days
Farmland classification: Not prime farmland

Map Unit Composition

Mahtomedi and similar soils: 75 percent
Minor components: 25 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Mahtomedi

Setting

Landform: Outwash plains, stream terraces
Landform position (two-dimensional): Shoulder, backslope
Down-slope shape: Convex
Across-slope shape: Convex
Parent material: Sandy outwash

Typical profile

A - 0 to 5 inches: loamy sand
E - 5 to 8 inches: sand
Bw1 - 8 to 15 inches: gravelly coarse sand
Bw2 - 15 to 30 inches: gravelly sand
C - 30 to 60 inches: gravelly sand

Properties and qualities

Slope: 6 to 12 percent
Depth to restrictive feature: More than 80 inches
Natural drainage class: Excessively drained
Capacity of the most limiting layer to transmit water (Ksat): High to very high (6.00 to 20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Available water storage in profile: Very low (about 2.7 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 6s
Hydrologic Soil Group: A
Other vegetative classification: Low AWC, adequately drained (G090AY002WI)

DOCUMENT #8

Map Unit Description: Graycalm-Menahga complex, 6 to 12 percent slopes--Washburn County, Wisconsin

Washburn County, Wisconsin

439C—Graycalm-Menahga complex, 6 to 12 percent slopes

Map Unit Setting

National map unit symbol: gvjv
Elevation: 600 to 1,160 feet
Mean annual precipitation: 25 to 33 inches
Mean annual air temperature: 36 to 45 degrees F
Frost-free period: 88 to 140 days
Farmland classification: Not prime farmland

Map Unit Composition

Graycalm and similar soils: 55 percent
Menahga and similar soils: 35 percent
Minor components: 10 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Graycalm

Setting

Landform: Outwash plains
Landform position (two-dimensional): Shoulder, backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Convex
Across-slope shape: Convex
Parent material: Sandy outwash

Typical profile

A - 0 to 3 inches: loamy sand
Bw - 3 to 22 inches: sand
E - 22 to 35 inches: sand
E and Bt - 35 to 80 inches: stratified sand to loamy sand

Properties and qualities

Slope: 6 to 12 percent
Depth to restrictive feature: More than 80 inches
Natural drainage class: Somewhat excessively drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): High to very high (6.00 to 20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Available water storage in profile: Low (about 4.9 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 6s
Hydrologic Soil Group: A



Sanitary Facilities	① ②
Soil Health	② ③
Vegetative Productivity	② ③
Waste Management	② ③
Water Management	② ③

Tables - Off-Road Motorcycle Trails - Summary By Map Unit

Map unit symbol	Map unit name	Rating	Component name (Percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
383C	Maitomedi loamy sand, 6 to 12 percent slopes	Somewhat limited	Maitomedi (75%)	Too sandy (0.72)	0.0	0.0%
383D	Maitomedi loamy sand, 12 to 30 percent slopes	Somewhat limited	Maitomedi (80%) Graycalm (5%) Framstad (2%)	Too sandy (0.72) Too sandy (0.30) Too sandy (0.50)	115.6	50.5%
439C	Graycalm-Maitomedi complex, 6 to 12 percent slopes	Somewhat limited	Graycalm (55%) Maitomedi (5%) Gledium (3%)	Too sandy (0.30) Too sandy (0.72) Too sandy (1.85)	88.5	38.7%
439D	Graycalm-Maitomedi complex, 12 to 30 percent slopes	Somewhat limited	Graycalm (60%) Maitomedi (3%)	Too sandy (0.30) Too sandy (0.72)	22.7	9.9%
461A	Bowstring muck, 0 to 1 percent slopes, frequently flooded	Very limited	Bowstring (85%)	Depth to saturated zone (1.00) Organic matter content (1.00) Ponding (1.00) Flooding (0.40) Dusty (0.00)	2.1	0.9%
Totals for Area of Interest					228.8	100.0%

Table - Off-Road Motorcycle Trails - Summary by Rating Value

Rating	Acres in AOI	Percent of AOI
Somewhat limited	226.8	99.1%
Very limited	2.1	0.9%
Totals for Area of Interest	228.8	100.0%

Description - Off-Road Motorcycle Trails

Off-road motorcycle trails are intended primarily for recreational use. They require little or no site preparation. They are not covered with surfacing material or vegetation. Considerable compaction of the soil material is likely.

The ratings are based on the soil properties that influence erodibility, trafficability, dustiness, and the ease of revegetation. These properties are stoniness, slope, depth to a water table, ponding, flooding, and texture of the surface layer.

Casey Loop ATV Development Index to Photo Locations

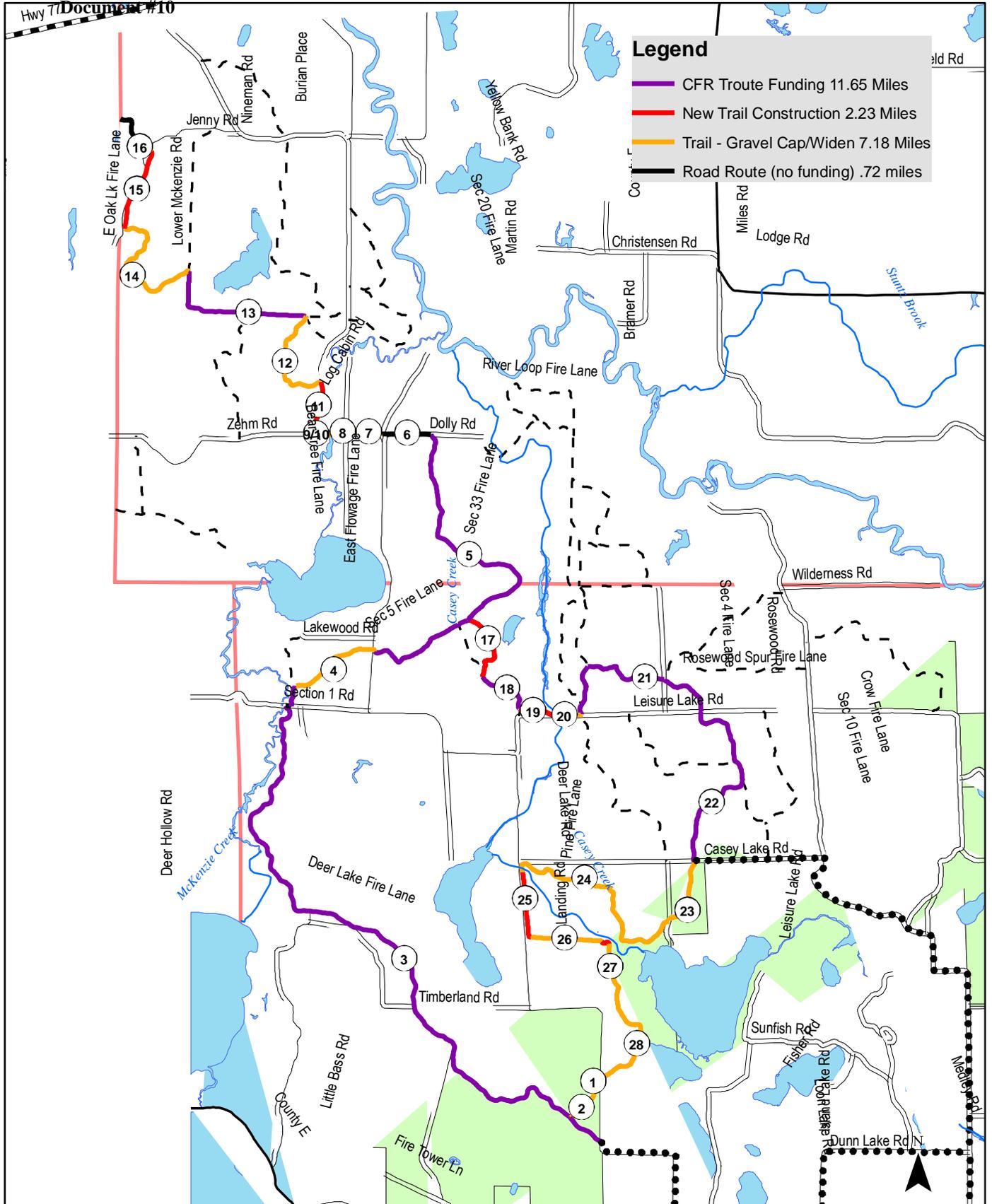




Photo 1: Existing logging trail on Graycalm soils. Proposed for ATV operation on native soil surface with spot gravel applications to prevent soil erosion on hills. – *proposed for summer ATV miles*

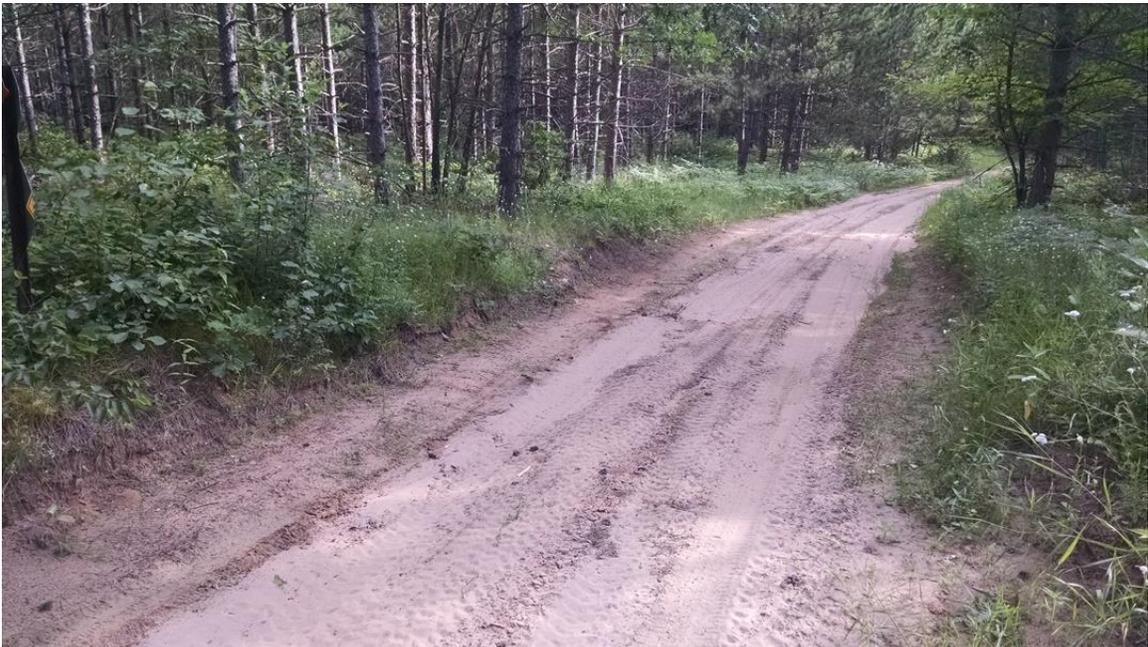


Photo 2: Existing logging trail on Graycalm soils. Proposed for ATV operation on native soil surface with spot gravel applications to prevent soil erosion on hills. . – *proposed for summer ATV miles*



Photo 3: Existing County Forest Road (Deer Lake Fire Lane) with 15+ year old gravel cap. – *proposed for County Forest Road Trout miles.*



Photo 4: Existing logging trail on Mahtomedi soils. Proposed for ATV operation on native soil surface with spot gravel applications to prevent soil erosion on hills. – *proposed for summer ATV miles*



Photo 5: Existing County Forest Road (West Flowage Fire Lane) with 15+ year old gravel cap. – *proposed for County Forest Road Trout miles.*



Photo 6: Town Road Route Connection – Dolly Road.



Photo 7: Existing trail on Menahga soils. Damage from ATV's on existing snowmobile trail adjacent to Lower Makenzie Road. Note "blown out" sand holes. This section of trail is proposed for reconstruction in order to relocate further north from the town road R.O.W. and to provide a stable trail surface. – *proposed for summer ATV miles*



Photo 8: Existing logging trail on Menahga soils. In need of reconstruction and gravel in order to stabilize trail surface. – *Proposed for summer ATV Miles*



Photo 9: Existing snowmobile trail on Menahga soils. Summer ATV use has impacted this segment of trail – note sand washing out onto town road. In need of reconstruction and gravel to stabilize trail surface. – ***Proposed for summer ATV miles.***



Photo 10: Existing snowmobile trail on Menahga soils. Summer ATV use has impacted this segment of trail causing deep gullying. In need of reconstruction and gravel to stabilize trail surface. ***Proposed for summer ATV miles.***



Photo 11: New trail construction to eliminate blacktop town road route. Menahga soil type. This section of trail requires clearing, stumping, shaping and gravel surface. – *Proposed for summer ATV miles.*



Photo 12: Existing logging trail on Menahga soils. Soft trail surface will require re-shaping and gravel surface. – *Proposed for summer ATV trail*



Photo 13: Existing County Forest Road (South Oak Lake Fire Lane). Trail in need of gravel surface and is proposed for a County Forest Road Aids development project. – *proposed for County Forest Road Trout miles*



Photo 14 Existing logging trail on Graycalm soils. Proposed for ATV operation on native soil surface with spot gravel applications to prevent soil erosion on hills. – *proposed for summer ATV miles*



Photo 15: New trail construction to eliminate town road route. Graycalm soil type. This section of trail requires clearing, stumping, shaping but is proposed for operation on native soil surface. – ***Proposed for summer ATV miles.***



Photo 16: Town Road Route Connection to Burnett Co. Trails– Atherton Road



Photo 17: Trail Construction on old abandoned snowmobile trail segment. Trail is deeply washed and gullied. Proposed for full reconstruction and gravel cap. Trail lies on Menahga soils. – ***Proposed for summer ATV miles.***



Photo 18: Existing County Forest Road (West Flowage Fire Lane). Trail in need of gravel surface and is proposed for a County Forest Road Aids development project. – ***proposed for County Forest Road Trout miles***



Photo 19: Trail Construction on old abandoned snowmobile trail segment. Trail is overgrown and washed/gullied in spots. Proposed for full reconstruction and gravel cap. Trail lies on Menahga soils. – *Proposed for summer ATV miles.*



Photo 20: Short segment of town road route (400 feet) to cross Casey Creek (Leisure Lake Road)



Photo 21: Existing County Forest Road (Section 4 Fire Lane). – *proposed for County Forest Road Trout miles*



Photo 22: Existing County Forest Road (Pine Fire Lane) – *Proposed for County Forest Road Trout miles*



Photo 23: Existing snowmobile trail on Menahga soils. This section of trail runs in close proximity to several large wetland complexes associated with Casey and Goose Lake. Most of this trail segment is soft sand and unstable, requiring reconstruction and gravel surface. – *Proposed for summer ATV miles*



Photo 24: Existing snowmobile trail on Menahga soils. This section of trail runs in close proximity to several large wetland complexes associated with Casey and Goose Lake. Most of this trail segment is soft sand and unstable, requiring reconstruction and gravel surface. – *Proposed for summer ATV miles*



Photo 25: This section of trail lies on Menahga sands, requiring reshaping and gravel surface. The trail also needs to be aligned slightly the east (left on this photo) to allow for proper clearances along Lower Makenzie Lake Road. – *Trail proposed for summer ATV miles*)



Photo 26: Existing logging trail on Menahga sands. Trail in need of reconstruction and gravel surface. – *Trail proposed for summer ATV Miles.*



Photo 27: Existing logging trail on Menahga sands. Trail in need of reconstruction and gravel surface. – *Trail proposed for summer ATV Miles.*



Photo 28: Existing logging trail on Menahga sands. Trail in need of reconstruction and gravel surface. – *Trail proposed for summer ATV Miles.*

CORRESPONDENCE/MEMORANDUM

DATE: July 1, 2015 FILE REF: 8700

TO: Members of the Off-Road Vehicle Council and Advisory Members

FROM: Diane Conklin, Liaison

SUBJECT: Further Clarification of "Hybrid Trails (Troutes)"

Administrative Code NR 64.02 (9m) describes a "Hybrid Trail (Troute)" means an all-terrain vehicle trail and route combination that allows all-terrain vehicles and motor vehicles to utilize the same linear surface and the combination is used as a trail connector as defined in sub. (15).

NR 64.02 (15) "Trail Connector" means an all-terrain vehicle trail that connects one trail to another trail or services.

When rolling out this new type of area available for recreational use, we failed to consider how far the applicant's jurisdiction would go. Therefore, we feel there is a need to further clarify this definition.

To provide some clarity we have reviewed other language within the administrative code to see if we find similar situations. In ss. 23.33 (1m) (b) we provide the following (b) the department or a federal agency, county, or municipality may designate any of the following located **within their respective jurisdictions**: 1. All-terrain vehicle routes, all-terrain vehicle trails and public all-terrain corridors that may be used by operators of utility terrain vehicles.

During the initial presentation of TROUTES, we did not utilize the words, "within their jurisdiction" to explain how to utilize these trail/route combinations. Counties do not have the ability to designate roads that are outside of their jurisdiction such as within town limits, city limits, etc. It would be up to those respective governmental units to determine this.

Therefore, we would like to provide additional clarification of a TROUTE as being a portion of land that connects a trail to a trail or services [within their jurisdiction]. This would mean that if a County submitted an application that commenced at a funded trail, traveled down a county road, connected to a town road that connected to services or additional trails, it would be eligible for the section of road that the county has jurisdiction over and would not be penalized because it connected to a town road that then connected to services or additional trails.

Cc: Patrick Kirsop, Section Chief CF/2
Mary Rose Teves, Bureau Chief CF/2
Mike Kowalkowski, Legal Counsel LE/8

Casey Loop ATV Development Troute Justification

DOCUMENT #12

