

April 27, 2004

Mr. Dale Bosworth
Chief, USDA Forest Service
1400 Independence Ave., SW
Washington, DC 20250

Dear Chief Bosworth:

The undersigned organizations, representing millions of Americans who engage in quiet outdoor recreation activities on National Forest lands throughout the nation, commend the USDA Forest Service's intention to develop new policies and regulations to address unmanaged off-road vehicle use and the growing negative consequences of such use. We appreciate the opportunity to offer input in this process and strongly urge the agency to propose and implement meaningful reform that safeguards natural resources and the associated values that make our activities in National Forests so rewarding.

We appreciate your recognition of unmanaged off-road vehicle use as one of the four greatest threats to the long-term health of our National Forests. This threat includes impacts to the land, air and water quality, wildlife and habitat, and the experiences of millions of Americans who visit National Forests to hike, backpack, paddle, climb, birdwatch, horseback ride, cross-country ski, snowshoe, and mountain bike. Roughly 150 million Americans participate in these and other quiet outdoor recreation activities every year, and they turn to National Forests for their fresh air, clean water, wild plants and animals, inspiration, and natural quiet and backcountry character.

It is well-established that the proliferation of off-road vehicle and snowmobile use places soil, vegetation, air and water quality, and wildlife at risk through pollution, erosion, sedimentation of streams, habitat fragmentation and disturbance, and other adverse impacts to resources. These impacts cause severe and lasting damage to the natural environment on which human-powered and equestrian recreation depends and alter the remote and wild character of the backcountry. Motorized recreation monopolizes forest areas by denying other users the quiet, pristine, backcountry experience they seek. It also presents safety and health threats to other recreationists.

Despite the seriousness of these threats, off-road vehicle management by the Forest Service has been inconsistent from forest to forest, and current regulations are not comprehensive and strong enough to address growing off-road vehicle problems. These factors have combined to exacerbate illegal trespass, unauthorized route creation, safety concerns and user conflicts, undue damage and disturbance to sensitive habitat and resources, and strain already woefully short-handed law enforcement officers. Addressing this problem requires, at a minimum: 1) regulations that facilitate effective enforcement on the ground; 2) real agency commitment to addressing the serious threats caused by off-road vehicles in a timely and consistent way; and 3) significantly higher agency budget requests to Congress to boost the number of full-time law enforcement officers nationwide.

Executive Orders (11644 and 11989) provide clear direction for public land management agencies to develop effective regulations for managing off-road vehicle use. With this upcoming regulatory change, the Forest Service has an opportunity to make off-road vehicle regulations clearer and more explicit, and to provide a consistent set of rules that all Forests must meet.

Many of our organizations have long supported the broad policy changes outlined by the Forest Service to date. Strengthening current regulations to prohibit cross-country motorized travel and

limit off-road vehicles (including dirt bikes and all-terrain vehicles) to designated roads and off-road vehicle routes clearly marked as open for their use will address fundamental policy needs. However, these reforms alone will not address the enormity of the problems caused by off-road vehicle recreation. It is critical that the Forest Service take additional steps to ensure basic protections for public land, wildlife and other users of these special places. These steps, many of which reflect requirements in the Executive Orders, include:

- Protecting traditional foot/horse trails from motorized use: motorized vehicles may only travel on roads and off-road vehicle routes (ORV routes) designated in a public planning process and specifically engineered and constructed for motorized travel.
- Designating roads and routes for off-road vehicle travel through a site-specific and public process under the National Environmental Policy Act. Renegade roads/routes created by users without authorization must be closed until full analysis is completed. Unauthorized use of these renegade routes significantly damages quiet recreation experiences and threatens the safety of other users who are confronted by dirt bikes, ATVs, and other motorized vehicles in areas where they are not expected.
- Authorizing off-road vehicle use only in a manner that protects natural resources, environmental values (e.g. quiet, landscape character), public safety and the experience of other forest users. The agency has a positive obligation to analyze new recreational technologies/activities before they are allowed to determine whether or not they are compatible with this goal and, if they are, at what levels and where. The agency does not have an obligation to allow all forms of recreation to occur on Forest Service lands.
- Prohibiting the use of off-road vehicles in wilderness quality lands such as roadless/unroaded areas and wilderness study areas.
- Authorizing off-road vehicle use only to the extent that effective monitoring and enforcement are annually funded, implemented and used to determine appropriate levels of continued off-road vehicle use.
- Establishing a two-year timeline for implementing this plan, after which any forest that has not completed designations and closed renegade roads/routes will allow motorized recreational use only on roads/ORV routes that have been analyzed and then designated for such use.
- Creating a consistent set of minimum off-road vehicle regulations, and enforcement and monitoring standards that all National Forests must meet, while allowing individual forests to develop or maintain more protective measures.
- Developing specific regulations that address snowmobiles and other motorized over-snow vehicles.

Incorporating this comprehensive set of common sense policy reforms is critical to increasing the likelihood that new regulations will more effectively control this use, protect natural resources, and ensure continued and varied opportunities for quiet outdoor recreationists and all Americans.

We applaud the Forest Service for taking the initiative to address this serious and growing problem. Thank you for considering these recommendations. We look forward to working with you in the months ahead to implement strong reform.

Sincerely,

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