

Recreation Outdoors Coalition
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Date: February 23, 2009

To: State Media

Subject: Forest Service Travel Management Planning in California's National Forests

From: Sylvia Milligan, Chair, Recreation Outdoors Coalition

Summary: The Recreation Outdoors Coalition (ROC) believes the Forest Service's (FS) travel management planning

- is based on flawed interpretation of the California Vehicle code and unsubstantiated concern for public safety;
- has failed to meaningfully consider public input when developing national forest travel management proposals;
- has failed to coordinate with counties on road management strategies that will affect motorized recreation and public access;

As a result, thousands of miles of existing system roads as well as unauthorized roads and motorized trails in the State's national forests will be closed to motor vehicle travel. This is coming at a time when the popularity of motorized recreation has never been higher. Many counties and the general public are unaware of these proposed changes and the effects they will have on recreational opportunities in the forests. Rural communities and local businesses that provide recreational services will also be affected economically.

Recommendation: ROC encourages the media to print the attached commentary about our experience with the planning process in the "Editorial" or "Opinion" section of your newspaper. Unless this information is shared with a broader audience and more people become involved in the travel management planning process, the Forest Service will likely make decisions that significantly reduce all motor vehicle access to California's national forests.

Thank you for your consideration in printing this information. More detailed information about our concerns is available upon your request.

Sincerely,

/s/ Sylvia Milligan

Sylvia Milligan
Chair, Recreation Outdoors Coalition

cc: State OHV Organizations

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In November 2005, the Forest Service (FS) issued final travel management regulations, which require all national forests to designate roads, trails, and areas where motor vehicle travel will be allowed. Upon designation, cross-country travel off these routes and areas will be prohibited. The Travel Management Rule applies to all motor vehicles. It is not just an off-highway vehicle (OHV) Rule for managing the use of non-highway legal vehicles. Whether you hunt, fish, camp, hike, cut firewood, sight-see or enjoy riding your all-terrain vehicle or dirt bike, the Rule is going to affect your access to your national forests. The Recreation Outdoors Coalition, in general, supports the Rule and the need to designate routes for motor vehicle use to reduce the environmental impacts from off-road travel.

The Forest Service is currently preparing travel management plans for motor vehicle travel on all national forests. The majority of these plans for the national forests in California will be completed in 2009. In California, this planning process is also known as the route designation process. The travel management planning process in California's national forests has raised three key concerns to members of the Recreation Outdoors Coalition. They are:

1. Planning for Successful Travel Management Programs. California has the highest level of OHV use of any state in the nation with 4.99 million OHV users. The Regional Forester for California has adopted restrictive policies regarding motorized mixed use (defined as the use of the same FS roadway by both highway legal and non-highway legal vehicles). The Regional Forester cites the California Vehicle Code and public safety as the reasons for prohibiting non-highway legal OHVs on FS passenger car roads with a maintenance level (ML) of 3, 4 or 5. There are 8,903 miles of ML 3, 4 and 5 roads in California, most of which are unpaved. This represents 21.5 percent of all FS road miles in the State. Many of these roads have been safely used by OHVs for decades. The FS will continue to allow non-highway vehicles to operate on their high clearance (or ML 2) road system. These roads are generally short, dead-end spurs and provide no services. Motorized mixed use on passenger car roads will only be sparingly allowed. Creating contiguous travel loops to provide quality riding opportunities requires the use of many passenger car roads. Without these roads, there will be large gaps in the road system where non-highway legal vehicle travel currently occurs.

National-level FS direction is to manage mixed use traffic in a safe manner on forest roads. National direction states no further FS studies are needed if existing mixed use on a road complies with State traffic law and there is no mixed use crash history. Motorized mixed use on unpaved FS roads is allowed under the California Vehicle Code (CVC) according to the California Highway Patrol (CHP), but the Forest Service continues to cite the CVC to support proposed OHV prohibitions. The Forest Service should accept CHP's decision that the CVC does not apply to forest "highways" (unpaved passenger car roads). The Regional Forester's current policy is a major barrier to developing quality OHV systems for non-highway legal vehicles. Many route options have already been eliminated by prohibiting non-highway legal vehicles on unpaved passenger car roads.

Mixed use accident information does not support the Agency's concern about public safety. In the past 15 years, there have been 11 mixed use accidents on 41,501 miles of FS roads in California. Three accidents involved a FS employee running into an OHV; 1 involved a County Deputy Sheriff hitting an OHV. ROC asserts unpaved ML 3-5 roads should be open to all vehicle classes unless an exception exists for some road segments due to public safety, past accidents, resource concerns, user conflicts or other considerations that cannot be mitigated. The Regional Forester should follow Forest Service national direction and the agency's own guidebook for analyzing mixed use on FS passenger car roads.

2. Collaboration with the Public. The Forest Service in California completed an inventory of "unauthorized" roads and trails in the national forests. "Unauthorized" roads and trails are routes that exist on the ground, but have not been officially designated as part of the Forest Service's transportation system. This inventory found over 10,000 miles of routes with current evidence of some motor vehicle use. During the route designation process, California national forests will determine if these routes should be added to their road system or closed to motor vehicles. The public submitted many miles of routes for designation. To date, several national forests in northeastern California are proposing to close 75 to 97 percent of them. There is insufficient rationale on why routes were dropped from consideration. The scale of these closures does not reflect a reasonable balance between access and environmental protection. While the FS promised a transparent planning process, opportunities for the public to fully engage in travel management have been limited. Most national forests have not established collaborative working groups to draft travel management plans that would be more responsive to the public's desire for access to their national forests. There are proven principles for creating successful travel management programs, but these are not reflected in the draft travel management plans ROC has reviewed to date.

3. Interface with County Road Systems. There are miles of maintained, unpaved county roads within the national forests in northern California. Motorized mixed use is a long-standing accepted practice on many unpaved county roads. Many unpaved county roads link with FS passenger car roads. Several northern California counties already allow or will be designating their unpaved roads into and through the national forests for motorized mixed use. They are designating county roads at the same time the Forest Service is prohibiting mixed use on the majority of their unpaved passenger car roads. Without integrated planning and agreement on road management strategies, there will be major inconsistencies in how each agency provides for OHV recreation. The riding public will be confused. The Forest Service should coordinate with County Boards of Supervisors and Public Works Departments to ensure a seamless transportation system for the public to enjoy.

Sincerely,

/s/ Sylvia Milligan

Sylvia Milligan
Chair, Recreation Outdoors Coalition