

**Recreation Outdoor Coalition  
4000 Beacon Drive  
Anderson, California 96007**

October 14, 2008

Travel Management Team  
Rogue River - Siskiyou National Forest  
Siskiyou Mountains Ranger District  
645 Washington Street  
Ashland, Oregon 97520

Dear Travel Management Team;

Thank you for the opportunity to comment on your Notice of Intent for Motorized Vehicle Use, dated August 26, 2008 in the Federal Register. The Recreation Outdoor Coalition (ROC) represents many local recreational groups and clubs in northern California. Many of our members enjoy riding their non-highway legal vehicles in the Rogue River-Siskiyou National Forest (RR-S NF). ROC's mission is to promote responsible access, multiple-use, stewardship, tolerance and safety for those recreating on our public lands.

Please consider the following comments and significant issues as you develop alternatives to your Draft Environmental Impact Statement.

1. Allow non-highway legal vehicles on all unpaved National Forest System (NFS) passenger car roads unless a rare exception exists.

*Rationale:* While ROC is pleased with your proposal to allow mixed use on 3,390 miles of roads and 20-25 miles of roads converted to motorized trails, we believe all unpaved NFS roads should be open to travel by non-highway legal vehicles. ROC understands the Forest Service (FS) definition of maintenance level (ML) 3, 4, and 5 roads as being passenger car roads. However, our interpretation of current FS Manual and Handbook direction is this: prudent drivers of standard passenger cars, in nearly all cases, stay on ML 5 (paved) roads. We believe all paved (asphalt, chip seal, etc.) roads should be ML 5. Nearly all ML 3 and 4 national forest system (NFS) roads are unpaved.

We believe almost all traffic on "FS designated passenger car" roads is high clearance vehicles (pick up trucks, sport utility and trail rated vehicles). It is a misnomer for the FS to continue to refer to NFS unpaved roads as "passenger car roads." Most NFS passenger car roads are single lane with design speeds less than 25 mph and low average daily traffic counts. Non-highway legal vehicle travel should be allowed on these roads. "Share the road" information, maps, and/or road signs will greatly enhance visitor safety on all mixed use roads.

FS passenger car roads provide important links to the RR-S NF's maintenance level ML 2 road system and motorized trails. The High Cascades District is an example. There are numerous gaps in the District's road system that preclude loops and long distance touring by non-highway legal vehicle operators. It is not possible for ROC to determine the ML of the dotted black lines in your NOI map legend. When contacted by ROC, Steve Johnson was unable to give us the breakdown of road mileages by ML. Please include this information for each DEIS alternative. Display the MLs on your DEIS maps with different symbology and whether mixed use is allowed.

2. Include summary tables that list the proposed changes to your current transportation plan.

*Rationale:* ROC did not find any tables in your NOI or WEB site that listed the proposed road and trail designations by their identification number, vehicle class or season of use. Please include this information for each alternative in the DEIS so we can cross-walk road numbers with this same information on your maps.

3. Your NOI does not reference any road maintenance backlog.

*Rationale:* ROC assumes you have a road maintenance backlog as many other national forests do. ROC doubts the Forest's constrained road budget will ever allow the RR-S NF to fully meet FS road maintenance standards for all your passenger car roads. Alternatives to address your annual road maintenance and backlog maintenance costs should be presented in the DEIS. Consider various options to reduce these costs such as reassigning the maintenance levels on low use, high cost passenger car roads, converting other roads to motorized trails, or closing low use roads with high resource impacts, etc.

For selected passenger car roads, lower their operational maintenance level to reduce maintenance costs. Passenger car roads with ADTs less than 40 with moderate to high maintenance costs should be considered for reassignment as ML 2 roads. If MLs need to be temporarily raised to provide more economical commodity haul, do it at that time, then drop back to a lower operational maintenance level when the project is completed. Passenger cars can still be driven on ML 2 roads if drivers choose to do so. Please refer to ROC's ML paper that summarizes current national FS policy and our suggestions.

4. Designate routes that access most primitive camp sites or fishing sites.

*Rationale:* While public access to these historically used sites is important, many popular sites should have a parking area or parking width defined to reduce impacts to riparian areas. Access to these sites has existed for a long time. If there are resource concerns with any of them, then mitigate them. Do not use the travel management planning process to prohibit motor vehicle access when resource impacts should have been addressed before now if they were serious.

5. The NOI did not address motorized access for dispersed camping or parking widths off designated routes.

*Rationale:* DEIS alternatives should include a range of motorized access options for these activities. Some national forests are restricting parking off any designated road or trail to one vehicle length. This is a very restrictive and narrow application of the FS Travel Management Rule. Please allow some flexibility for parking in your DEIS alternatives.

6. "Seasons of use" are not described in the NOI.

*Rationale:* The Travel Management Rule allows the FS to adopt seasons of use and emergency closures. We suggest year-round use unless your staff proposes something different and provides appropriate rationale in the DEIS. Please apply a wheeled vehicle restriction to all groomed snowmobile trails from December 25 to March 31 in your DEIS's preferred alternative. This will prevent rutting of the trails and eliminate safety concerns.

Any weather closure plans should be based on weather-related criteria (rainfall, soil conditions, etc). ROC assumes any "season of use" for specific roads applies to everyone, including Forest Service vehicles. Please respond to that assumption in the DEIS.

7. Impacts to adjacent private and other public land need to be addressed in the DEIS.

*Rationale:* The closure of 60-65 miles of roads and the prohibition of mixed use on 1,230 miles of NFS roads may affect adjacent private and public lands. This may result in increased off-highway vehicle (OHV) use on other ownerships and subsequent resource damage. ROC believes the displacement of OHV use from the national forests will increase illegal riding elsewhere. Illegal OHV travel may also occur in new areas on the RR-S NF as a result of the proposed prohibitions. Please discuss this concern in the DEIS.

8. The RR-S NF travel management plan should be integrated with vehicle use on county roads that cross the Forest.

*Rationale:* It makes no sense for the Forest Service to publish an NOI that restricts OHV travel on NFS roads if the counties are designating their unpaved roads for non-highway legal vehicle travel or allowing this use. The DEIS should contain some alternatives that demonstrate integration with county transportation plans. Some OHV travel may also be desired on short segments of NFS or other paved roads.

Again, thank you for the opportunity to provide ROC's comments. Please add my name to your mail list to receive both a hard copy and compact disc of the DEIS and Final EIS and their accompanying maps.

Sincerely,

*/s/ Sylvia Milligan*

**Sylvia Milligan**

Chair, Recreation Outdoor Coalition

Enclosure:

ROC May 2008 Maintenance Level Paper and FS Policy