

March 9, 2012

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

As associations that represent the interests of millions of responsible motorized recreation enthusiasts, we oppose the U.S. Department of Agriculture (USDA) report entitled *A Comprehensive Framework for Off-Highway Vehicle Trail Management*, referred to as the Report, which was recently pulled from the U.S. Forest Service (USFS) website. We have questions concerning the planning and review process of the Report, the content of the initial Report, and any plan to reissue the Report. Moreover, we seek to clarify implications in the Report that portray the off-highway vehicle (OHV) community in a negative light. The document should be fact based and neutral.

We, the undersigned, believe that this new Report may result in a deleterious relationship between the responsible motorized community and the USDA.

According to the introduction in the Report, the purpose of the document is to "... help OHV trail managers develop sustainable trails and protect the environment surrounding the trails." We agree that this is a worthy goal and appreciate the intentions of the USDA. However, the Report only serves to strengthen the current underlying apprehension of our community toward the USDA and other federal stakeholders with regard to trail management.

While the author references many OHV groups and associations, we understand that the USDA or any other federal agency associated with this document never consulted with the motorized community in the Report's initial planning and review process. We find this to be disconcerting, since the Report focuses on OHV trail management. The author acknowledges two non-governmental groups (International Mountain Bicycling Association [IMBA] and Alaska Trails) as experts in OHV trail management. Although IMBA is not an OHV expert per se, its trail management materials and techniques are respected because of the similarities in design considerations.

Without being mentioned in the acknowledgement section, the author does mention within the Report two examples of excellent OHV management materials made available by the American Motorcyclist Association (AMA) and National Off-Highway Vehicle Conservation Council

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(NOHVCC). They are the following: the AMA Off-Highway Motorcycle & ATV Trails Guidelines for Design, Construction, Maintenance and User Satisfaction; and the NOHVCC Management Guidelines for OHV Recreation.

A group that is not mentioned in the acknowledgement section, but is cited numerous times throughout the Report, is Wildlands CPR. This group has extreme and radical opinions concerning the use of OHVs. For example, Wildlands CPR calls for OHV reform because “Off-road vehicles can go nearly anywhere, killing and harassing wildlife and destroying vegetation.” The group also states on its website that, “As a result of our on-going efforts, so far (with 47 decisions still to come), the Forest Service has removed 7,890 miles of roads and motorized trails from the designated travel system, and refused to designate 28,679 miles of user-created routes.”

Why does the U.S. Forest Service cite such a radical and extreme group for an official federal report that should be fact based and neutral? The author goes further and adopts the Wildlands CPR’s entire Environmental Analysis, which correlates OHVs and the use of trails with climate change. In fact, the Report states that OHV use causes “increase[s] in frequency and intensity of weather events.” A statement such as this transcends the realm of rationality.

In the Appendix D: Best Management Practices of the Report, the author admits to citing a Wildlands CPR document (“*Best Management Practices for Off-Road Vehicle Use On Forestlands*”) that is anti-OHV for the basis of best management practices. For example, the Appendix references a Wildlands CPR proposal that no routes/trails should be allowed in “citizen or agency proposed wilderness ... and other lands with wilderness character.” This best management practice usurps congressional authority in the process to designate Wilderness. Only Congress can designate Wilderness. Moreover, “wilderness characteristics” was the defining language used to describe the Department of the Interior’s “Wild Lands” policy.

Furthermore, the Report concludes with a paragraph that indicates a bias of the author against the OHV community. The author states, “This framework was developed to help trail managers corral the OHV management dragon. The author hopes it has provided some insight into the nature of OHV trails and some tools to help keep the beast at bay. Happy herding and happy trails!” We find this statement derogatory and unfitting to be in an official government report.

We understand this Report was issued and made available to the many agencies within the federal government, but has since been pulled from the USFS website. Based on our aforementioned concerns, we applaud the USDA for this action. However, we have questions about what is coming next concerning republishing this Report. Will our areas of concern be addressed or will there be a disclaimer? Our groups believe a disclaimer is insufficient because the material sourced from Wildlands CPR is not supported with scientifically based data and should not be included in the Report.

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We encourage the USDA to continue to engage the public in its deliberations on trail management. Our members stand ready to serve as a resource for you as you further consider the future composition of the Report.

Thank you for your consideration of our request. We look forward to receiving your timely response to the questions and comments above.

Sincerely,

All-Terrain Vehicle Association
American Motorcyclist Association
BlueRibbon Coalition
Colorado Off-Highway Vehicle Coalition
Colorado Snowmobile Association
Trails Preservation Alliance
Utah Shared Access Alliance

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