

March 31, 2004

Mr. Dale Bosworth
Chief
U.S. Forest Service
Washington DC 20250

Dear Chief Bosworth:

As professional scientists, we applaud you for recognizing that unmanaged off-road vehicle use is one of the great threats to the long-term health of our Forests and Grasslands. We appreciate the opportunity to express our concern about motorized recreation impacts on the 192 million-acre National Forest System. As the agency develops new management policies, we strongly encourage you to ensure that those policies are based on valid scientific research and are focused first and foremost on natural resource protection.

It is well established by a large body of published scientific literature that off-road vehicles, including all-terrain vehicles (ATVs), dirt bikes and jeeps quickly strip vegetation and rut the land, leading to erosion of soil at rates much greater than are natural. Soil eroded into streams and rivers can dramatically reduce the quality of native fish habitat as well as that of most other aquatic life. Declining soil quality and quantity cannot support vegetation, thus harming wildlife, and degrading entire ecosystems. Off-road vehicles can also negatively impact wetlands. For example, damage caused by “mud bogging” can take decades to recover.

Off-road vehicles crush, bruise, shred and otherwise destroy trees, shrubs, and other plant life. Soil and vegetation disturbances create ideal conditions for invasive weeds and other exotic plants, such as knapweed, to become established. Damage to native vegetation only makes it easier for exotic invaders to out compete native plants. Furthermore, off-road vehicles can spread invasive weeds across pristine wildlife habitat when traveling cross-country and along unplanned routes.

Wildlife are also jeopardized by unmanaged off-road vehicle use. Off-road vehicles can disturb and be used to harass wildlife. These adverse effects are exacerbated during winter when wildlife are already stressed by weather conditions and low food supplies. Poorly planned and user-created routes fragment and degrade wildlife habitat. Vehicle noise can directly impede the ability of wildlife to find prey, avoid predators, and successfully reproduce.

Off-road vehicle engines, especially two-stroke engines, are highly polluting. Emissions of carbon monoxide, polycyclic aromatic hydrocarbons, MTBE, particulate matter, and other pollutants seriously degrade the quality of the air, soil, snow, and water, and have demonstrated adverse human health effects.

In the above description, you may recognize that many of the environmental impacts caused by off-road vehicles are cumulative, and sometimes synergistic, combining to produce impacts that are greater than the sum of their parts. In fact, you alluded to this in your speech last April. When one considers the role that dirt bikes, ATVs and other off-road vehicles play in fragmenting wildlife habitat and spreading invasive weeds—two of the major threats you

identified—the far reaching nature of negative impacts from uncontrolled off-road vehicle use come into focus. This can be particularly significant if off-road vehicles are allowed in roadless areas, which act as important refuges for wildlife. Additionally, off-road vehicles are a potential ignition source for fires, which is also a great concern to the Forest Service.

By enhancing controls and regulations on off-road vehicles in National Forests, the Forest Service would minimize adverse effects on soil, vegetation, wildlife, ecology, and other forest users. As scientists who have studied this or related issues for many years, we urge the Forest Service to ensure that new regulations governing off-road vehicle use on National Forests are based on the abundant peer-reviewed scientific research available, and resource protection. To meet this goal, the Forest Service must:

- Permit off-road vehicle uses only under conditions that protect natural resources, environmental values (e.g. quiet, landscape character), public safety, and the experience of other forest users.
- Analyze new recreational technologies/activities before permitting their use, to determine whether or not those activities are appropriate or, if environmentally harmful, necessary; and if allowed, control the level and restrict the sites of use.
- Designate roads and routes for off-road vehicle travel through full and public environmental analysis processes under the National Environmental Policy Act.
- Designate off-road vehicle routes based on specific ecological criteria, including, but not limited to: prohibiting designation of routes in sensitive habitat areas; and locating routes to minimize erosion, wildlife harassment, impacts to natural wildlife behavior (e.g. feeding, breeding, resting) and habitat fragmentation.
- Permit off-road vehicle use only if monitoring and enforcement are annually funded, implemented, and used to determine appropriate levels of continued off-road vehicle use.

Developing policy using these considerations will help safeguard the environmental quality of our National Forest for the benefit of the millions of Americans who presently enjoy them, and for future generations.

Sincerely,

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