



January 29, 2024

Regional Forester, Region 6  
U.S. Forest Service,  
Attn: Northwest Forest Plan Comments  
1220 SW 3rd Ave.  
Portland, OR, 97204

Dear Planning Team:

On behalf of the Motorcycle Industry Council<sup>1</sup> (MIC), Specialty Vehicle Institute of America<sup>2</sup> (SVIA), and Recreational Off-Highway Vehicle Association<sup>3</sup> (ROHVA) – together referenced as the Associations, thank you for the opportunity to provide comments on the USDA Forest Service published Notice of Intent (NOI) to prepare an Environmental Impact Statement on the proposal to amend the 17 land management plans of the Northwest Forest Plan (NWFP).

The Associations have a long-standing interest protection of the values and natural resources found on lands within the planning area, and regularly work with land managers to provide recreation opportunities, preserve resources, and promote cooperation between public land visitors. The Associations also prioritize educating its members and the public about responsible motorized off-highway vehicle (OHV) recreation.

The popularity and value of recreation cannot be denied, and since the 1994 NWFP there has been a massive growth in outdoor recreation on public lands with a significant amount occurring on FS and BLM lands in the planning area. The U.S. Department of Commerce's Bureau of Economic Analysis (BEA) recently released economic data from the [Outdoor Recreation Satellite Account \(ORSA\) for the year 2022](#) which confirms the largest economic impact in ORSA's history. Outdoor recreation is one of the most powerful economic impact drivers of the

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<sup>1</sup> The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

<sup>2</sup> The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

<sup>3</sup> The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>

U.S. economy. Exceeding mining, utilities and chemical products manufacturing industries, outdoor recreation is on par with other job-rich industries such as hospitals, transportation, and educational services. These new figures reveal that outdoor recreation generates \$1.1 trillion in economic output (2.2% of GDP), 4.98 million jobs and comprises 3.2% of U.S. employees.

States in the planning area showed an economic benefit of \$73.8B in California, \$7.5B in Oregon, and \$20B in Washington. The top three outdoor recreation activities were RVing, boating/fishing, and motorcycling/ATVs.

The NOI states it will identify changed conditions that are driving the need to amend the plan with a focus on five key areas: wildfire resilience, climate change adaptation, tribal inclusion, sustainable communities, and conservation of old growth ecosystems and related biodiversity. In addition, it will amend or otherwise strengthen the effectiveness of the Northwest Forest Plan by incorporating the latest science and helping forests adapt to social, economic, cultural, and ecological changes. The Forest Service also intends to preserve the elements of the NWFP that are working well.

In addition, the NOI states that because the NWFP is a landscape-scale plan covering 24 million acres, the amendment will not address recreation. The Associations submit that this is a huge mistake. As noted earlier in this letter, recreation is a major driver of the U.S. economy and it should be addressed in the amendment. Recreation and its associated resources can *help* the Forest Service become more resilient and able to respond to climate change and prepare for and respond to wildfires. We've seen this in the massive infusion of dollars that Congress approved in recent years to address the maintenance backlog within the Forest Service.

Any amendment should carefully consider how recreation and recreationists can continue to be assets to managing for climate change. We submit that the Federal Highway Administration may serve as a model for the USFS and other federal land management agencies. The [\*Trails and Resilience: Review of the Role of Trails in Climate Resilience and Emergency Response\*](#) prepared by the U.S. Department of Transportation Volpe Center for the FHWA Office of Human Environment in March 2023 recognizes as much. Its abstract:

Shared use paths and other trails are key pieces of transportation infrastructure that can also provide recreational opportunities and, as seen during the COVID-19 pandemic, improve health and wellbeing during a public health emergency. Additionally, trails can become critical infrastructure during an emergency when other transportation facilities are inaccessible, and can support activities including evacuation and search and rescue. However, trails are often vulnerable to impacts from climate change and extreme weather due to their location. Through a literature review and interviews with national trail organizations, this white paper

explores existing research, highlights project examples, and identifies research gaps for trails in connection to climate resilience, emergency response, and public health emergencies.

*Trails and Resilience* recognizes that trails (and, by extension, recreation) can benefit resilience, provide tools to respond to weather and fire events, and be designed in such a way as to mitigate impacts from climate change. We submit that this is where the Forest Service should start any rulemaking, policy, guidance, or amendment. Forests exist to provide for recreation and other multiple uses. We understand that for recreational opportunities to remain in place for posterity, sustainability and conservation of resources must be of paramount importance, but the original mission must not be forgotten.

*Trails and Resilience* suggests a future that should rightfully be contemplated by the Forest Service:

Future research could investigate techniques to design for, plan, and manage trails to be resilient to climate change, as well as strategies to incorporate trails into larger resilience-focused efforts. Research could also focus on innovative finance strategies to leverage existing funding for trail resilience.

Also, *Trails and Resilience* recognizes the real-world benefits of having recreational trails on the ground during major weather events and other emergencies:

Trails are often overlooked as elements of essential infrastructure for a resilient transportation system. In emergencies where other transportation facilities are shut down or inaccessible, people may use trails to get where they need to go. Trails can also provide critical access in emergencies for people without access to a car or transit service. Trails for both motorized and nonmotorized use can provide access for search and rescue, fighting wildfires, or other emergency response operations.

Any proposed amendment should follow the lead set by *Trails and Resilience* by incorporating trails and recreation in all facets of planning, including climate change, resiliency and wildfire management.

The Associations also believe the NOI should address the federal land transportation system – a central thread within all of the current 5 key areas - as a key focus area that undergoes a robust analysis to better inform development of a broad range of alternatives.

It is also important to add Transportation as a key focus area since this plan amendment will, in fact, amend and guide current and future Forest Plans which subsequently guide project level road/trail-based activities such as fuel reduction and forest health projects, shaded fuel breaks along transportation routes, OHV route designation and management efforts, and dispersed or developed camping opportunities.

The 1994 NWFP relied heavily on road decommissioning program to achieve habitat protection goals and objectives. That guidance was often cited on some federal units as a rationale for closing recreation roads/trails without due process. We should avoid similar closures in the future. As a result, the Associations recommend the Planning Team add transportation as a key focus area that analyzes and discusses transportation-related functions, management prescriptions, or benefits including, but not limited to:

- Public access
- Recreation asset
- Wildfire suppression
- Post fire recovery/restoration
- Hazard tree abatement
- Road and trail-based fuel breaks
- Forest health
- Armoring recreation facilities
- Road/trail designations
- Maintaining transportation facilities
- Protection of cultural resources
- Road and trail connectivity for recreation, resource management, and wildfire suppression

In closing, the Associations thank the planning team for reviewing our comments and look forward to working with the agency in a collaborative manner in this effort to better manage and protect important natural, cultural, and recreational resources that will benefit local communities and provide economic sustainability.

Sincerely,

*Don Amador*

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