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US Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

Submitted via email.

Please accept the following comments on behalf of CORVA, the California Off-Road Vehicle Association. CORVA has been advocating for motorized recreation on public land for over 50 years, working in partnership with federal and state agencies. Our members, business sponsors and business supporters enjoy a wide variety of forms of recreation in our national forests and want to ensure that the Northwest Forest Plan Amendment allows for their continued access and enjoyment.

Access by street legal and off-highway vehicles is critical to the enjoyment of our national forests by members of the public and a contributor to the economic well-being of rural communities, which depend on tourism as an important source of revenue. It is well-known that the most common method of accessing trailheads to Wilderness areas, white-water rafting streams and off-road trails is by motorized vehicle. Visitors to forests may have vans carrying kayaks, Subarus with camping equipment tied to roof racks or have dirt bikes in the bed of a pick-up truck, but all have one important purpose in common – they are using motorized vehicles, dirt roads and trails to access their favored form of recreation in national forests.

When reflecting on the importance of vehicular access to the enjoyment of forested land, the proposed Northwest Forest Plan Amendment is clearly insufficient in its scope. The purpose and need for the amendment as detailed in the Notice of Intent is broad and includes improving resistance to catastrophic wildfire, supplying consistent amounts of timber to support economic viability in rural communities and updating the Northern Spotted Owl recovery plan. In addition, the goal of increasing consultation with tribal communities would bring a wealth of traditional knowledge that would enhance management of forested lands.

But all these admirable goals cannot be accomplished without considering their effects on motorized access and recreation. Recreation and by extension motorized access is important to the public and is the avenue that leads to their enjoyment of forested lands. Including what is important to the public may also help motivate them to assist the agency in

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partnership to achieve the stated goals of the proposed Northwest Forest Plan Amendment, because the agency cannot do everything alone. Therefore, it is inconceivable that recreation and the greater need for motorized access were excluded from the planning process. The proposal also fails to speak of the richness and opportunity motorized access to forests provides. More worrisome is the potential for harm to recreational opportunities and motorized access if these continue to be excluded from the amendment process.

The proposed amendment is attempting the impossible by trying to separate 'the human' and corresponding human interaction with the forest from the other worthy goals of the proposed amendment. According to the Multiple Use sustained Yield Act of 1960, the Secretary of Agriculture is tasked to; *"...develop and administer the renewable resources of timber, range, water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services"*.

Acknowledging the above, the Forest Service has no choice but to make significant changes to the proposed Northwest Forest Plan amendment to include the importance of recreation and vehicular access, otherwise the document would violate the purpose if not intention of the Multiple Use Sustained Yield act, the Forest Service's governing document.

At a minimum, the proposed Northwest Forest Plan Amendment must include the intention of increasing recreational access and surpassing current levels, and the desire to incorporate the use of roads and trails as fire breaks as part of the wildfire prevention strategy. Additionally, motorized routes managed for recreational use facilitate the management of the forest, and specifically aid in fire abatement, which helps protect old growth forests, which is one of the over-arching goals of the proposed amendment.

Without that meaningful change, the proposed amendment is incomplete and does not present the public with enough information to either support or oppose the proposal. CORVA looks forward to receiving the improved Northwest Forest Plan Amendment proposal, which should be a document representing a more integrated approach to forest management that includes recreation as a significant component of forest management.

On behalf of the Board of Directors of CORVA,

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