



December 19, 2023

Jennifer Eberlien
 Regional Forester
 U.S. Forest Service, Pacific Southwest Region
 1323 Club Drive
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Subject: A recent proliferation in proposals for new motorized vehicle routes in the Sierra Nevada

Dear Regional Forester Eberlien:

We, the undersigned NGOs, are seeing an increase in proposals for new motorized vehicle routes (most of which are being characterized as “trails”) in some of California’s National Forests, including the Inyo, Lassen, Plumas, and Tahoe, among others. These proposals are often made in the name of rural economic development and access.

While we very much support sustainable rural economic development, including the creation of jobs through fuel management, tourism, the introduction of broadband, and watershed restoration, the recent flurry of off-highway vehicle route proposals is causing us some serious concern.

A case in point is “Connected Communities,” a proposal by an organization called Sierra Buttes Trail Stewardship for establishing over 600 miles of motorized vehicle “trails” and over 300,000 acres of proposed “Recreation Zones” and “Future Planned Trail Areas” in the Plumas, Lassen, Tahoe, and Humboldt-Toiyabe National Forests. Please see <https://sierratrails.org/wp-content/uploads/2023/04/ITS-CC-Poster.pdf> for more details. We are struck by the fairly large number of new motorized route proposals at the same time that are shown on the Plumas, Lassen, and Tahoe SOPAs as if in response to Connected Communities.

Another example is the “Towns to Trails” proposal being promoted by the Sustainable Recreation and Tourism Initiative (SRTI). It proposes a motorized vehicle route network on lands managed by multiple entities, including the Humboldt-Toiyabe National Forest, Inyo National Forest, Bureau of Land Management, and the Los Angeles Department of Water and Power. The vision includes building upon existing trail and soft-surface infrastructure in the region and aspires to involve representatives of the affected counties, tribes, land managers, various stakeholders, and others in planning the final locations and uses of the trails and routes.

We support construction of new trails, including new motorized routes, after public involvement and environmental review that are designed to protect sensitive resources, limit user conflicts, and for which funding for maintenance and enforcement is assured. Any new trail or other route should be in carefully chosen locations that do not degrade natural or cultural values. The permitted uses of the new trails should match the land allocations, recreation guidelines, and management prescriptions in National Forest plans. To be clear, single-track, motorized trails are an appropriate use of our public lands when located in areas that do not adversely impact other public land values, and after public involvement and environmental review.

Below is an outline of a number of concerns we have around the rapid expansion of new motorized trails in the Sierra Nevada. Any process should work to mitigate these impacts:

- On any proposed “multi-use” trails, motorized recreation is likely to dominate the trail network to the detriment of use by lower impact forms of recreation including hiking, mountain biking, hunting and horseback riding
- Increased wildfire risk from growth in motorized vehicle use in the backcountry
- Many portions of the trail network will be redundant with thousands of miles of already established roads and routes for motorized use
- Motorized recreation has an outsized-impact on wildlife that are increasingly concentrated in areas as much of their earlier range is recovering from recent megafires and changing climatic conditions. It also may divide important corridors game animals need to mate and forage and reducing range of hunting opportunities
- While these trail proposals are presented as a way to reduce illegal trail use, which we laud, history in the California Desert has shown that, especially without proper funding, enforcement, and management, the construction of new roads and trails can lead to more illegal use and not better control of off-road vehicles.

To help limit these potential impacts, we ask that the Regional Office help direct and guide National Forest staff and advocates for new motorized vehicle routes to adhere to the following best practices while developing new trail ideas and considering them under NEPA:

- Avoid proposing new routes in unroaded areas and other areas that do not currently have any designated vehicle routes. This includes avoiding new routes in Inventoried Roadless Areas (IRAs), other wilderness-eligible landscapes, and smaller unroaded areas that possess important habitat, watershed, cultural, recreational, or other values that might be degraded by motorized vehicle activity. We believe that the few remaining roadless areas in the northern Sierra Nevada, southern Cascades, and elsewhere should not be further fragmented by the construction of motorized trails.
- Do not propose that motorcycle use be allowed on routes that are purportedly also meant for non-motorized uses. Motorized and non-motorized uses are simply incompatible on a single-track trail. There are already well known and documented visitor use conflicts around the state between equestrians and cyclists. Allowing dirt bikes on a trail over time will likely drive away other users.
- Consider the cumulative and potential site-specific impacts of all roads, motorized “trails,” and other routes on watersheds, wildlife (including wildlife movement and landscape-scale habitat connectivity), cultural resources, the risk of accidental fire (as you know, dirt bikes have been a frequent cause of accidental fires in many California National Forests since the 1960s), non-motorized recreation, plants, and other important values and resources. These analyses of potential impacts should be based upon recent, thorough, and site-specific surveys.
- Avoid new motorized vehicle route construction opposed by affected tribes.
- To the greatest extent possible, new motorized trails should work to convert the already heavily-roaded sections of the Forests and help in decommissioning poorly maintained Forest Service roads.
- Include monitoring plans for all trails, especially new ones, and identify trigger points that prompt specified management actions.
- Avoid the construction of new motorized routes that may lead to worsened illegal motorized vehicle incursions in designated wilderness, units of the National Park System such as Lassen Volcanic National Park, units of the State Park System such as Plumas-Eureka State Park, the Pacific Crest National Scenic Trail and other designated non-mechanized and non-motorized trails, and non-federal land.
- The expansion of motorized trails should be accompanied by an equal expansion of non-motorized trails and the net closure of old-logging roads that are redundant, unmaintained, or don’t have a clear purpose or destination.
- All additional mileage of motorized use should be accompanied with clear plans and funding for future maintenance and enforcement.

Thank you for your consideration. We look forward to discussing this issue more with you, your Regional Office team, local National Forest staff, tribes, various stakeholders, community leaders, trail advocates, and others in the months ahead.

Sincerely,

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