

Data Submitted (UTC 11): 1/28/2024 12:29:10 AM

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Comments: To: USDA, USFS, USDI BLM, Pacific Northwest Region

This is a Comment Letter regarding Amendments to the Northwest Forest Plan (NWFP).

The Emerald Trails Riders Association (ETRA), a non-profit trail motorcycle club based in Eugene, Oregon. Our mission is to promote enjoyable, sustainable, and safe off-highway vehicle recreation.

The United States Department of Agriculture (USDA) has been privileged with the huge task of balancing the needs of the United States (US) population and supporting sustainable ecosystems on public lands. The science behind the 1994 NWFP and US population has been evolving more rapidly than ever before, but the task of the USDA remains the same. Primary drivers of the original NWFP, subsequent reports, and Memoranda of Understanding seemed to be balancing commercial interests and their environmental impact.

References related to studies on recreation, and specifically Off-Highway Vehicle (OHV) recreation, have been limited. The "Northwest Forest Plan, The First 20 years (1994-2013), Social and Economic Status and Trends", Chapter 7 acknowledges the growth of the population and the expected trend of increased interest in recreation, including OHV recreation. The report also noted the "supply and visitation as an estimate of demand" did not include OHV trails due to the "major shift in policy" related to implementation of the Travel Management Plan. Studies cited in this report were from 2003 thru 2013 related to Level 1-5 roads, not OHV trail systems or open OHV areas like the Oregon Dunes National Recreation Area. The "Northwest Forest Plan Interagency Monitoring, 20-Year Report Socioeconomic Status and Trends" (2015, Grinspoon) did note, "Recreation visitor spending is the largest single source of economic activity associated with NFS and BLM management in the NWFP area." Although, the vast majority of the paper was about timber. We suggest that there should be more resources delegated to trails, including OHV trails.

The ongoing evolution of the economic impact of recreation on public lands in the western US cannot be understated. Rural communities dependent on the timber and mining industries were devastated by the environmental restrictions placed on resource extraction. Recreation has become a lifeline for our rural communities. The 2023 U.S. Department of Commerce's Bureau of Economic Analysis (BEA) noted that outdoor recreation in 2022 generated \$1.1 trillion in economic output and created 4.98 million jobs. The report also noted that "Motorcycling/ATVing was the third-largest conventional activity for the nation at \$11.5 billion..." Outdoor recreation value added 2.5% to Oregon's gross domestic product (GDP) and 2.7% to Washington's GDP. By supporting OHV recreation opportunities, the USDA is supporting local and regional economies.

The popularity of OHV recreation has been well-documented. The largest study that we are aware of is the "Off-Highway Vehicle Recreation in the United States and its Regions and States: An Update National Report from the National Survey on Recreation and the Environment (NSRE)" (2008). The study found that 22.2% of Oregon residents and 22.1% of Washington residents were participating in OHV recreation. According to the Health and Fitness Journal of Canada article, "Health related Quality of Life of Habitual Recreational Off Road Vehicle Riders", (Burr, et al, 2010) "Off-road riders have high levels of mental and physical functioning QOL (quality of life). Given their higher physical function, off-road motorcycle riders are less likely than all terrain vehicle riders or the general population to have physical limitations or health problems." Those of us who participate in OHV recreation are well aware of it's benefits and we invest in those benefits by getting our families out on the trail. People who have never enjoyed our public lands may not understand the value of protecting it. Many OHV users consider themselves stewards of public land because of their personal connection that was developed from their time on the trails.

We recognize many of above citations are more than 10 years-old. The studies based on the economic growth of the outdoor recreation economy can serve as an indicator that the demand for OHV recreation opportunities continues to climb. Advances in the science of building and maintaining OHV trails continues to grow and be disseminated. USDA employed recreation managers should continue to support sustainable OHV trail opportunities for the economic and social benefits. As you strive to find balance with all the competing interests for our wonderful public land resources, please consider the value in partnering with OHV user groups and employing OHV experts towards bolstering sustainable, enjoyable, and safe OHV recreation areas.

ETRA partners with multiple public agencies and we welcome your questions or comments.

Thank you for this opportunity to submit a public comment.

Emerald Trail Riders Association  
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