

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 30, 2004

Proposed Rule for Designated Routes and Areas for Motor Vehicle Use  
c/o Content Analysis Team  
U.S. Forest Service  
P.O. Box 221150  
Salt Lake City, Utah 84122-1150

**Comments on proposed rule on travel management;  
designated routes and areas for motor vehicle use**

To Whom It May Concern:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed rule on travel management; designated routes and areas for motor vehicle use. The Conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural, and river parks; open space; trails; and wildlife habitats that are easily accessible to the general public. Portions of the Angeles National Forest lie within the Rim of the Valley Trail Corridor, which is a portion of the Conservancy's jurisdiction. The Conservancy and the Forest Service are partners in a Memorandum of Understanding for cooperative activities in the Rim of the Valley Trail Corridor. While we realize that the proposed rule affects all the National Forests, our comments are provided in reference to the Angeles National Forest.

The Conservancy supports the Forest Service's efforts to designate acceptable routes for motorized vehicles in the National Forests. In the proposed rule, the Forest Service has noted that off-road motor vehicle use in the National Forest System has increased in recent years. The Forest Service identifies numerous adverse environmental impacts associated with cross-country wheeled motor vehicle use.

The Conservancy concurs with several comments made by numerous professional scientists in a March 31, 2004 letter to the Forest Service. These include:

- (1) Permit off-road vehicle uses only under conditions that protect natural resources, environmental values....

U.S. Forest Service

Proposed rule: designated areas for motor vehicle use

August 30, 2004

Page 2

- (2) Designate roads and routes for off-road vehicle travel through full and public environmental analysis processes under the National Environmental Policy Act;
- (3) 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;
- (4) 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.

The Conservancy also concurs with comments made by numerous organizations that a timeline should be identified to complete the off-road vehicle route designations.

The Conservancy also provides the following recommendation for Section 212.55(e): *Congressionally designated wilderness and primitive areas*. The following language would be removed under the proposed rule: "...trails and areas in Congressionally designated wilderness and primitive areas shall not be designated for motor vehicle use." The proposed rule would preclude National Forest System roads, National Forest System trails, and areas on National Forest System lands in Congressionally designated wilderness areas from being designated for motor vehicle use, unless motor vehicle use is authorized by the applicable enabling legislation for those areas. The Conservancy is concerned that removing the above-stated language would leave too much potential for harmful damage from roads within wilderness areas. The existing language should be retained. However, it may be appropriate to add clarifying language that allows for motorized vehicle use in emergencies.

Thank you for the opportunity to comment. Please contact Judi Tamasi of our staff at (310) 589-3200, ext. 121 if you have any questions.

Sincerely,

JEROME C. DANIEL  
Chairperson