

September 12, 2004

Mr. Dale Bosworth, Chief
United States Department of Agriculture
Forest Service

Regarding: Proposed Rule for Designated Routes and Areas for Motor Vehicle Use in the National Forest System

Dear Chief Bosworth:

The Environmental Concerns Committee (ECC) of the North Carolina Chapter of the American Fisheries Society reviewed the proposed rule regarding regulation of off-highway vehicle (OHV) use on the National Forest System. The ECC offers the following comments on the action for your consideration.

OHV riding is inherently detrimental to soils and can adversely affect aquatic life when erosion is severe and poorly controlled. Sediment and elevated turbidity levels directly harm fish and invertebrates and degrade their spawning and foraging habitats. This has occurred on some OHV areas in the National Forests in North Carolina.

The ECC recognizes that OHV riding is a popular activity that can be accommodated along with other multiple uses of the National Forests in North Carolina. However, we feel that this activity should be restricted to areas where the integrity of diverse aquatic resources can be conserved. Some areas are suitable for the establishment of OHV areas. However, many have sensitive resources including wetlands, steep and erosion-prone soils, and trout supporting streams that are not well suited to the activity, particularly when unauthorized and unplanned trail development occurs. Unauthorized trail development is commonplace because of the desire for new and challenging routes by some OHV users.

Because of these concerns, the ECC commends your efforts to manage OHV use on the National Forest System to ensure, in part, that the activity is more compatible with natural resource conservation. The proposed rule should help do this by reducing diffuse impacts of OHV use on parts of the National Forest System that have occurred, and continue to occur, under the current, more ambiguous "open unless closed" policy. In addition to establishing a designation process that prohibits motor vehicle use in undesignated areas, the rule would include a monitoring requirement of the environmental effects of OHV use on designated roads, trails, and areas. We encourage the use of aquatic habitat and fishery resource measures as part of this monitoring to provide the information needed by rangers and other responsible officials when making objective decisions regarding designations and whether the local natural resources are compatible with OHV use.

Thank you for the opportunity to provide comments on the proposed action.

Cordially,

David McHenry, Chair
Environmental Concerns Committee
North Carolina Chapter
American Fisheries Society