



Appeals Deciding Office
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RE: Access Designation in Restricted Areas on the Ocala National Forest
Rick Lint, District Ranger, Responsible Official – Seminole Ranger District
Jerri Marr, District Ranger, Responsible Official – Lake George Ranger District
Decision Notice: January 17, 2006 *Ocala Star Banner*

Dear Appeals Deciding Officer,

This appeal is being filed for the above-reference project pursuant to 36 C.F.R. 215. (36 CFR 215.11).

As President of the Florida Four Wheel Drive Association I wish to formally appeal your Record of Decision regarding the Final Environmental Impact Statement (FEIS) for Access Designation within the Ocala National Forest. A formal response to the earlier Draft Environmental Impact Statement (DEIS) in 2004 was submitted by then president Raymund Woo, and comments from that earlier letter will be used for clarification and to comply with appeal regulations.

Our Association represents more than 1500 families within organized Clubs who support initiatives that will assist land use management while providing licensed Off Highway Vehicle (OHV) recreation access throughout the State. It is our intent to continue our assistance to the Forest Service during the implementation of the FEIS. Our members are activists for proper land use and have proven this by devoting many hours in volunteer efforts with cleanups, ranger assistance (past and present) and through education of the rules for safe and legal off-road recreation. I have volunteered myself into the new “Trail Ranger” program that is under supervision of Bret Bush, ONF Recreation Director, since 2005 and have organized cleanups in the Ocala National Forest.

The FL4WDA is eager to provide volunteer assistance with the implementation and maintenance of this FEIS (as well as the second phase ADP) and appreciate the Forest Service’s willingness to address our concerns.

Concentrated Use Areas

We strongly object to the decision to nearly eliminate Concentrated Use Areas within the forest. An area of concentrated use allows for motorized activity within a specific area to lessen the impact on surrounding trails and to provide an area of suitable terrain for recreation.

With the rise of off-road recreation and a decline in trail system mileage it makes poor sense to also reduce areas of concentrated use. Areas such as Church Lake and the Pipeline Management Areas have many concentrated use areas currently in use that provide impact relief for the surrounding trail system. These areas can be seen on the DEIS Alternative Map B (http://www.fs.fed.us/r8/florida/news%20releases/ocala_access/altb.pdf). The lack of provision for a comparable Concentrated Use Area in the Seminole District, which has far more visitors and traffic than Lake George, must be addressed in order to offset the increased travel the remaining trail system will be receiving.

We recommend the creation of vehicle specific Concentrated Use Areas, including those that permit for licensed vehicles and prohibit unlicensed machines such as All Terrain Vehicles and Off-road Motorcycles. From all the current Concentrated Use Areas within the forest, the FEIS specifies the preservation of only one 37 acre sugar sand depression known as the “Rodman Pit.” While this provides an area of concentrated use, its footprint and location within the forest leaves much to be recreationally desired and subsequently it could be predicted that the reduced trail system in the immediate surrounding area will sustain a dramatic increase in traffic and land impact. It is our concern that this increased impact on the existing trail system will perpetuate further trail closures. Furthermore, the lack of sufficient variety of terrain within this Concentrated Use Area does not suitably satisfy the recreational needs of the users.

For these reasons the decision must be changed and analysis undertaken which takes into consideration keeping open Concentrated Use Areas or if failing to keep them open the environmental consequences of concentrating use on the remaining reduced trail system. The FEIS failed to consider our substantive comments below:

From our earlier response sent during the comment period for the DEIS:

“Concentrated Use Areas are a reasonable objective to include because it will allow motorized recreation access in those areas which are already highly used due to accessibility and desirable terrain, while lessening the impact on the remaining sections of the forest. ATV, dirt bike, and extreme 4X4 activities can be assigned to a designated play area that spares other regions from high impact use. However, the USFS needs to be able to confine these activities to the Concentrated Use Area – perhaps by utilizing abandoned mining pits that are currently posted off limits. This is a viable long term solution, but support needs to be maintained for access to routes requiring high clearance 2 or 4 wheel drive that appeals to the growing majority of the general public that is looking to get off the paved road into a semi-secluded spot.”

Failure to consider our substantive comments as well as failure to consider the environmental consequence of concentrating use on the remaining reduced trail system is a violation of the National Environmental Policy Act.

Closed unless marked open

The FL4WDA strongly objects the decision to adopt a trail access policy that renders legitimate travel ways “closed unless marked open.”

Providing a travel way system that is easy for the public to decipher in terms of its legal trespass should be a priority of this ADP. It is our belief that the general public (specifically licensed 4X4 enthusiasts) intends to obey the laws of the Forest yet at times these laws are misleading or confusing when traveling the forest roads. While electronic announcements and even detailed maps available at Ranger Stations are good tools for informing the public of Forest Service rules and regulations the need of an intuitive travel way system is key to long term success and cost effective maintenance.

Signage is fragile and vulnerable, whereas earthen barriers and gates are more durable. It would be prudent to invest in travel directors that are cheaper and more durable; therefore it makes sense to barricade areas that are closed and leave the open areas unmarked - rather than wasting resource marking all open trails.

A clear, readily accessible access map is a better way to educate users, is much cheaper to implement, and easier to enforce and monitor. When signage is illegally removed or vandalized it creates a potential conflict between the visitor and law enforcement, a confusion of legal access will be commonplace (maps not following actual signage).

For these reasons the record of decision must provide language indicating that routes will be marked closed in addition to the map(s) implementing this decision.

Closing Comments

The Florida Four Wheel Drive Association Board of Directors, Club Presidents and Members are eager to assist the Forest Service in Ocala National Forest with the FEIS as a means of providing a hand with trail cleanup, trail maintenance and by giving the public a reasonable venue for education on Tread Lightly and safe recreation. We anticipate the Forest Service to provide such groups with a reasonable amount of legal access that satisfies their recreational needs.

Respectfully submitted,

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