

October 15, 2009

Transmitted by email to:

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The Honorable Raul M. Grijalva
Chairman
Committee on Natural Resources
Subcommittee on National Parks, Forests and Public Lands
United States House of Representatives
1333 Longworth House Office Building
Washington DC 20515

Re: Subcommittee Hearing: October 1, 2009: SEMA Comments on H.R. 1925

Dear Chairman Grijalva:

The Specialty Equipment Market Association (SEMA) is pleased to provide comments to the House Subcommittee on National Parks, Forests and Public Lands in connection with the Subcommittee's consideration of H.R. 1925, "America's Red Rock Wilderness Act of 2009." SEMA supports the concept of wilderness designations but believes the legislation, while well-intended, is overly broad in scope and lacks consensus support at both the local and national levels.

SEMA is the trade association of the American automotive enthusiast, supported by 7,500 mostly small businesses nationwide that design, manufacture, rebuild, distribute and retail specialty automobile parts and accessories for the automotive hobby. Equipment for off-highway vehicles (OHVs) – wheels, tires, lift kits, lights, truck caps, running boards, cargo storage, etc. – represents an important segment of products manufactured by SEMA members. SEMA also operates the SEMA Action Network (SAN), a nationwide partnership of vehicle clubs and enthusiasts who have a common interest in the auto hobby, including OHV and back-country recreation.

SEMA opposes H.R. 1925 for the following reasons:

- Local & State Support: SEMA supports wilderness designations when they are appropriate and necessary. However, local and State involvement is critical given the ramifications of these designations to local communities. SEMA does not believe the potential impact of H.R. 1925 is understood at the local, state or national level. For example, since first proposed, the legislation has expanded in scope rather than being refined. The amount of proposed wilderness has evolved from 4.1 million to 9.4 million acres, and would encompass more than one-sixth of the entire state of Utah. The legislation should not move forward until it can be demonstrated that there is a critical threshold of local, state and federal support, including sponsorship by members of Congress representing districts encompassing the land and federal agencies with jurisdiction over the land.

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- Federal Regulatory Support: The subject land is managed by the Bureau of Land Management (BLM). In testimony provided to the Subcommittee, BLM Director Robert Abbey confirmed that the agency had not undertaken a detailed analysis of each area to be designated as wilderness. He cautioned that detailed mapping is critically important in moving forward with such a task. Director Abbey also noted current uses which would conflict with the designations. He stated, “While many recreational activities, such as hunting and hiking, are compatible with BLM wilderness designation, others, such as mountain biking and OHV use, are not.” He then provided examples of current BLM-designated OHV areas that would be potentially closed such as Goldbar Canyon and Duma Point.
- Existing Roads and Trails: Inventories of existing roads and trails have not yet been completed for many of the areas subject to restrictive designations under H.R. 1925. Any legislation must take into account these roads and trails, many of which are used and maintained by OHV enthusiasts. When there is a determination to designate an area as wilderness, the legislation should contain clear language to specifically permit “cherry stemming” of the existing roads and trails. SEMA also supports cooperative approaches when creating wilderness designations such as establishing adjacent or nearby areas that are open to OHV use. H.R. 1925 does not adequately address these issues.
- Alternative Designations: SEMA supports alternative designations to “wilderness” that protect the land for future generations but also allow flexibility in use. For example, SEMA supports the creation of a “back-country” designation to protect the environment that may not meet the strict designation of wilderness, while also allowing the lands to be open to the public for a variety of recreational uses, including responsible OHV use. A back-country designation would be appropriate for many of the areas included in H.R. 1925 because evidence of recreational activities may be present, but are not the dominant feature of the landscape, which maintains its natural beauty.

Thank you for this opportunity to share our views. We look forward to working with you and the Subcommittee in the future and thank you for your consideration.

Sincerely,



Stuart D. Gosswein
Senior Director, Federal Government Affairs

Attachment: SEMA Position Statement regarding
Regulating Motorized Recreation on Federal Lands

SEMA POSITION STATEMENT

Regulating Motorized Recreation on Federal Lands

SEMA supports managed care of the nation's public lands in a manner that balances responsible recreational opportunities with a need to maintain the health and beauty of our federal lands, and the safety of patrons.

- **SEMA supports OHV policies that recognize the importance of vehicle-oriented recreation:** Increased OHV use in recent years has provided the American public with the ability to enjoy public lands in record numbers.
- **SEMA supports broad national guidelines combined with local management decision-making:** It is important that local officials have authority to work with the public and State, Federal and Tribal government leaders to make appropriate decisions on OHV access.
- **SEMA supports strong public involvement in decision-making:** SEMA recommends that government agencies be required to seek the active participation of the public in the process of designating OHV access and Wilderness Areas.
- **SEMA supports flexible timetables for designations:** The designation process is complex and may vary from forest-to-forest, or other federal land area. While there may be a uniform approach, the specifics must be dealt with at the local level according to the unique circumstances of each land area.
- **SEMA supports certain “user-created” routes:** By default, the designation process places the onus on the OHV recreational community to identify routes that were created in recent years that have not yet been inventoried (“user-created” routes). Many of these routes came into existence during “open” management and serve a legitimate need and purpose, and do not pose an environmental threat. In some cases, these uninventoried routes may even be more environmentally friendly and provide a better overall access solution than their inventoried counterparts.
- **SEMA supports reasonable application of “Emergency Powers”:** There are times when emergency closures are necessary to provide short-term resource protection or to protect public health and safety. Nevertheless, the public should be included in the decision-making process when such closures last beyond 12 months.
- **SEMA supports defined vehicle classes and use authorizations:** Vehicle classes need to be defined at the federal level so there is uniform application across the country when it comes to planning, mapping of roads/trails, etc.