

**Matthew D. Zumstein, District Ranger**

Carson Ranger District

1536 S. Carson St.

Carson City, NV 89701

**Ben Burr, Policy Director**

BlueRibbon Coalition

P.O. Box 5449

Pocatello, ID 83202

Day Use Areas in Dog Valley and Peavine Areas

 Public Comment

Dear District Ranger Matthew Zumstein,

BlueRibbon Coalition/ShareTrails (BRC) is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. We are invested in protecting access to dispersed camping and OHV recreation areas and are writing to provide comments on the Day Use Areas in Dog Valley and Peavine Areas.

Our members use motorized and non-motorized means of recreation, including OHV, equestrian, mountain bikes and hiking to access and enjoy recreating upon state and federally managed lands throughout the United States, including areas managed by the Carson Ranger District. Many of our members and supporters live in and/or recreate in Nevada and California and use motorized vehicles to access USFS lands located throughout both states. In addition to the critical access OHV vehicles provide to these areas, BRC members visit the lands mentioned herein for motorized recreation, sightseeing, photography, rockhounding, hunting, wildlife and nature study, dispersed camping and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future in this area and we hope to preserve responsible access to the Dog Valley and Peavine Areas for generations to come.

**General Comments**

We are opposed to the conversion of the Dog Valley and Peavine Areas to day use only. The request for comment page offered very little information related to the “resource damage as well as public health and safety concerns,” that are informing the need for this conversion. It also isn’t clear from the comment request page what kind of planning process is being pursued to decide the outcome of this project. There were no citations of CFRs or authorities the FS is relying on to make these changes. As such it isn’t clear to the members of the public whether this comment period is being offered to adhere to the Administrative Procedures Act of the National Envionmental Protection Act. With such little information regarding the purpose and need of this project with little documented evidence of the impacts being mitigated, it is unreasonable to assume that the public can make meaningful comments on the project.

Our organization has recently been tracking a disturbing trend of dispersed camping site closures. The RV Industry association anticipates that 2021 will see a 19.5% increase in RV sales over the record sales witnessed in 2020.[[1]](#footnote-1) Overlanding, rooftop tent camping, and van-based camping are all exploding in popularity. This surge is a result of the impacts of COVID on the American economy and the travel and tourism industry in specific. With the increase in remote work, many Americans are finding that they can live full-time in RVs and other comparable vehicles. It is worth noting that this surge in demand for dispersed camping is response to the risks to health and human safety arising from the spread of COVID in densely populated areas.

The agency doesn’t make it clear what health and human safety concerns are driving these closures, but it is well-documented that the surge of outdoor recreation on public lands is itself a response to other health and safety concerns. Closing more areas to dispersed camping use – especially at this time – will only lead to more concentration in the areas that are left open.

We would like to suggest that the USFS address the impacts of higher levels of use with management instead of closures. Management through closure isn’t management at all.

In a press release it was suggested by the USFS that these areas need to be closed because of their proximity to residential areas. Proximity to residential areas allegedly makes these areas not suited for camping. The factors suitable for a good camping experience are constantly changing. In our discussions with the dispersed camping community, there is a growing desire to camp near populated areas in order to have access to good internet coverage and amenities. There is clearly a public purpose and need for this kind of camping experience. More often than not, these campers work in high-paying remote jobs and are playing a crucial role in the economic recovery from COVID. Closure is a blunt response to impacts resulting from a highly demanded public use of USFS lands. Any impacts resulting from this use can be mitigated in other ways.

The Violation of stay limits being violated can be resolved through either increased enforcement of the limit, or USFS could consider granting an exception to stay limits for these areas. Trash dumping could be addressed by providing more trash collection bins in addition to increased enforcement against littering. Human waste disposal issues can be solved by building more restrooms near the most populated camping areas. Noise complaints should be handled on a case-by-case basis, and noise complaints can be addressed with enforcement.

Campfire-related impacts can be addressed through management approaches other than closure. USFS could look at forest-wide fire restrictions. Enforcement could be increased. Ultimately, any wildland fire start should be investigated, and anyone starting a wildland fire should be prosecuted and held accountable. Restricting access to public land through area closures has the potential to hurt those who have done nothing wrong.

It is apparent that OHV staging areas exist in the same areas where dispersed camping is occurring. If dispersed camping is displacing the ability to utilize staging areas, then USFS should begin the process of looking to the long term to see if designated campsites can be built to ensure that all users can enjoy their preferred recreation experience on public lands.

**Conclusion**

We would like to close by saying we support “shared use.” As long as overall visitation numbers are appropriate for the affected resources, recreation users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. We also hold that responsible recreational and other use of public lands can exist in harmony with ecosystem needs.

We would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,



Ben Burr

Policy Director

BlueRibbon Coalition

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1. <https://www.thegazette.com/business/rv-sales-soar-ahead-of-pandemics-second-summer/> [↑](#footnote-ref-1)