



BlueRibbon Coalition / Sharetrails

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Ben Burr, Executive Director

BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

November 22, 2021

Joshua Simpson,
Krasel Ranger District
500 North Mission Street
McCall, ID 83638

Dear Mr. Simpson,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide scoping feedback for the East Fork South Fork Restoration and Access Management Plan. 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. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of Idaho. Many of our members and supporters live in Idaho or travel across the country to visit Idaho and use motorized vehicles to access USFS managed lands throughout the state. BRC members visit the Payette National Forest for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. We would like to add our support to any comment submitted by the Idaho State ATV Association and any other individuals or organizations that advocate for motorized

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use. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Roads

There are already more than 82,000 acres of inventoried roadless areas accommodating non-motorized recreation. The USFS needs to accommodate the current and growing need for motorized recreation as well. In 2019, the Bureau of Economic Analysis recognized that \$374.3 billion was spent in the U.S. by consumers on outdoor recreation. The Forest Service must also recognize the economic value motorized recreation brings to local communities and make decisions that won't stifle these opportunities and businesses.

BRC strongly opposes decommissioning roads. We believe that active management can improve watershed conditions without removing these roads from the system and the USFS must consider all possible solutions before closure.

Popularity for accessing the nation's public lands is only increasing and land agencies need to properly manage the land to accommodate this growth. If users are restricted to fewer miles and smaller areas to recreate, the possibility of impact will increase in areas left open. BRC is concerned with creating a Minimum Road System. Roads not only provide recreation value but contribute to safety through search and rescue and emergency response teams as well as provide natural fire barriers for wildfires. The USFS should absolutely not put a minimum value on the roads in the area as trends can and will continue to change and the needs for roads could increase tremendously and setting this in stone will jeopardize the future of this forest.

BRC supports designating the Quartz Creek Road as a system road as well as creating motorized trails in the Wilson Mine area, Horse Haven area and Thunder Mountain areas. We appreciate the USFS recognizing these trails and the need for the new trails. We object to any closure of Quartz Creek Road, Sugar Creek Road, Three Mile Road, the upper road to Cinnabar, the access Road to the Red Metal Mine and any other trails or roads in the area. We also recommend analyzing a bypass above the slide near the Euginin Ranch.

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BRC strongly discourages restoration treatments on the 70 miles of mining roads. These roads can and are used by users to learn about the history and access areas of importance and recreational value. They should be officially included on the Motor Vehicle Use Map.

Dispersed Camping

Dispersed camping has also grown profoundly in the recent years especially in the Payette National Forest. Many recognize the social and mental health benefits of dispersed camping in solitude. We appreciate the USFS recognizes the need for this form of recreation within the forest and BRC supports active management of these sites rather than closure.

Users with Disabilities

We recommend that the USFS use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities.

On his first day in office, President Joe Biden issued an “Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.” This executive order established “an ambitious whole-of-government equity agenda” which focuses on addressing “entrenched disparities in our laws and public policies,” and mandates a “comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.”

Under this executive order, “The term ‘equity’ means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities....” Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory

disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Travel management policies focused on “minimizing” the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other “human powered” and “quiet use” forms of recreation in which many people with disabilities are unable to participate.

Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the USFS has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.

The Biden Administration’s focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The USFS is therefore required by this executive order and others mandating that federal agencies consider “environmental justice” in NEPA proceedings to consider whether any route closures in the Lincoln management plan would disproportionately harm disabled users’ ability to access public lands.

Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the USFS consider the access needs of

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disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.

Conclusion

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

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

Ben Burr
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'BB' followed by a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin' in a cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition