



BlueRibbon Coalition / Sharetrails

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Ben Burr, Executive Director
BlueRibbon Coalition
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December 10, 2021

Nikki Swanson
Sweet Home District
4431 Highway 20
Sweet Home OR, 97386

Dear Ms. Swanson,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Quartzville-Middle Santiam (QMS) Draft Environmental Assessment (EA)

in Willamette National Forest. 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 the Forest Service. Many of our members and supporters live in Oregon or travel across the country to visit Oregon and use motorized vehicles to access USFS managed lands throughout Oregon. BRC members visit this land for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature

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study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Many of our members hold organized events that include organized rides in this area. A significant portion of the education mission of organizations like ours and the fundraising that supports organizations like ours comes from these organized events, and we see the continuation of these events as an integral expression of protected rights including freedom of speech and freedom of assembly.

Project Specific Comments

BRC supports the broad project objectives to keep forests healthy and reduce the risk of wildland fires. We recommend using commercial treatment in the maximum amount of land possible. Best available science should be used in making these decisions. Past forest fires that have burned rampant because of the lack of forest projects should be looked at when making decisions.

The plan states a possible method to use is prescribed burns. If this method is chosen for an area, and a wildfire arises at any point, that wildfire should be treated as such and the Forest Service should not allow the wildfire to burn in order to meet prescribed burn objectives. This involves a lot of risks and wildfires should always be treated with as much urgency to suppress the fire as possible.

The USFS is proposing to “decommission approximately 14 miles of unused forest roads in the project area. An additional 19 miles of forest roads would be proposed for closing.” BRC strongly opposes closing or decommissioning roads. These roads serve various purposes. Roads not only act as a natural wildfire barrier to help protect the forests and protect wildlife and habitat but also are needed for fire treatments and emergency response teams. One goal identified within the plan is to help sustain local economies with timber harvest. The plan fails to mention the economic benefits to keeping roads open and available to recreational use. The Bureau of Economic Analysis showed that in 2019 outdoor recreation brought in \$459.8 billion. Outdoor recreation has only grown in popularity since then. The USFS should not stifle potential economic benefits through road closures. If any road is being proposed for closure or decommissioning due to resource impacts BRC recommends rerouting the road rather than closures. All management strategies should be exhausted before closure and decommissioning of roads.

The plan also states, "It would also include constructing approximately 32 miles of temporary road access consisting of 5 miles of new non-system (temporary) road and re-opening about 27 miles previously used, low standard, non-system roads (and decommissioning these after use)." If the roads are being used temporarily, they clearly are not affecting habitat and wildlife and should be strongly considered for permanent re-opening. These new roads could be a massive asset for reasons stated previously.

BRC is concerned with a "minimum road system". The USFS should not set limits for an ever changing environment. As use grows and changes what may be considered "minimum" now, will not be considered "minimum" in the future. Setting these arbitrary limits could create major problems for future forest needs.

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:

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Sincerely,



Ben Burr
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BlueRibbon Coalition



Simone Griffin
Policy Director
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