



BlueRibbon Coalition / Sharetrails

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Coronado National Forest

300 W. Congress Street

Tucson, AZ 85701

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Forestwide Material Source Sites project The Coronado 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 New Mexico or travel across the country to visit New Mexico and use motorized vehicles to access USFS managed lands throughout New Mexico. BRC members visit this land for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature 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

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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.

BRC Supports the overall goals and objectives of the proposed project and supports Alternative B. Because there are currently no authorized sites in the CNF, this project is well needed and will provide many forest benefits. The forest should develop all 17 of the sites. Because the sites are spread out throughout the forest all should be developed because impact won't be concentrated. This will also help with future projects to have material resources in various locations.

The draft EA states, "most forest roads are not adequately maintained owing to a lack of resources." Poor roads hinder the entire management of the forest and compromises the health of the entire forest. Without roads emergency response teams can't access areas and vegetation projects can't move forward. Access to the forest is crucial for proper management of the forest.

Users with Disabilities

BRC believes this project proposal is a step in the right direction 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.

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.

BRC applauds Coronado National Forest for recognizing the importance of maintaining roads and working to find solutions to best maintain them for future use.

Economic Benefits

Not having to rely on materials from commercial sources will be more cost effective and beneficial for the FS. The materials through the proposed material sites will provide better quality resources which also provide economic benefits. The Bureau of Economic Analysis found that in 2019, outdoor recreation accounted for \$459.8 billion. That has only increased since then and will continue to increase as outdoor recreation, especially motorized recreation, continues to grow in popularity. By improving access in the forest, the USFS is providing local economies more opportunities to capitalize on this growing trend.

Plan Specific Feedback

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Draft EA: "Complete maintenance on at least 200 miles of passenger car (ML 3, 4, and 5) roads annually throughout the plan period, based on a safety prioritization."

BRC Response: The USFS should not hardwire 200 miles into the plan, this number is arbitrary but instead should maintain the maximum amount possible that is feasible for the forest that year.

Draft EA: "Road conditions would be improved over time, which would increase traffic speed and decrease safety."

BRC Response: Appropriate speed limits should be implemented and enforced therefore safety does not need to decrease.

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,



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