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Ben Burr, Executive Director
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November 25, 2022

Ronald E. Hecker
Ashland Ranger District
P.O. Box 168
Ashland, MT 59003

Dear Mr. Hecker,

BlueRibbon Coalition (BRC) is writing to provide feedback for the South Otter Landscape Restoration and Resilience Project EA. 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 U.S. Forest Service. Many of our members and supporters live in Montana or travel across the country to visit Montana and use motorized vehicles to access USFS managed lands throughout Montana. BRC members visit these areas for motorized recreation, hiking, sightseeing, photography, hunting, wildlife and nature study, camping, water sports, and other similar pursuits. We would like to add our support to any comment submitted by any other individuals or organizations that advocate for motorized use

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and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Wildfire

BRC supports the broad project objectives and the proposed project to keep this forest healthy and reduce the risk of wildland fires to protect watersheds. We recommend using commercial treatment in the maximum amount of land possible including within IRA's. 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 these decisions. The largest threat to wildlife habitat, and watersheds is wildfire that completely destroys ecosystems. BRC supports the proposed vegetation treatments and believes the maximum amount of acreage of public land should be treated in order to keep the forest healthy and avoid wildfire through these management techniques.

One of the best things that can be done to protect wildlife and habitat and prevent extinction is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. One wildfire could cause an entire species to go extinct. We support the USFS in properly managing the forests to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate forest projects that help mitigate fires.

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 USFS 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.

Roads and Trails

Roads and trails are crucial to the public lands. BRC supports active management and supports maintenance, improvement and reconstruction on the current 111 miles of Forest System routes that will be needed for the completion of this project. We also support the use of the 168 miles of proposed temporary routes. These temporary routes should be analyzed and adopted permanently into the Forest System. These roads provide a purpose and need that will be utilized in the future as well. Not only do roads and trails provide access for recreational use which has increased tremendously over the past few years and stimulates local economies but it also provides access for other uses. Emergency response teams rely on roads and trails as well as administrators to access the land. Through this project none of the 25 miles of roads identified should be closed or decommissioned. These routes should be evaluated to be opened back up to public use as they had a history of use prior and provide unique recreation opportunities. If any roads or trails need to be temporarily closed to implement the

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proposed vegetation treatments, those areas need to be re-opened as soon as possible. If any road sections are identified to be recontoured or removed we support re-routing any of these sections rather than removing them from the forest road system as to still provide the same recreational value to the public. Lastly, roads act as a natural fire barrier which means healthier public lands.

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.

Management policies focused on “minimizing” the environmental impacts of motorized recreation has 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

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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 South Otter Landscape Restoration and Resilience plan would disproportionately harm disabled users' ability to access public lands.

Any approach to management 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 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.

Dispersed Camping

BRC believes that all users can and should be accommodated. The USFS should analyze adding even more dispersed camping opportunities to the forest. According to The Dyrt, a camping app, camping has grown immensely since 2019. Public lands are needing more camping facilities than ever before as almost 50% of campers are new campers. The number of people who use public land to camp is only growing every year. The USFS needs to strongly consider providing as many camping areas as possible as to not concentrate use in limited sites. BRC supports all recreational activities if done responsibly.

Timber Harvest

Timber harvest and any sales from forest treatments will also help stimulate the local economy. We believe the USFS should move forward with timber harvest on the full amount of acres proposed. The proposed project provides local jobs and brings in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit.

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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:

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Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'B B' 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