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Ben Burr, Executive Director

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December 19, 2022

Molly Juillerat, Middle Fork District Ranger

Attn: Cedar-Gales Roadside Risk Reduction
46375 Highway 58
Westfir, Oregon 97492

Dear Ms. Juillerat,

BlueRibbon Coalition (BRC) is writing to provide scoping feedback for the Cedar-Gales Roadside Risk Reduction Project. 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 Oregon or travel across the country to visit Oregon and use motorized vehicles to access USFS managed lands throughout Oregon. BRC members visit the Willamette National Forest for motorized recreation, 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 and

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

Forest Health

BRC supports the broad project objectives to keep forests healthy and reduce the risk of wildland fires as well as provide safe public lands and roads for all to enjoy. By mitigating roadside danger through addressing hazardous trees, forests will thrive while supporting public health and safety. We recommend treating ALL roads throughout the 157,000 acres of project area with the proposed 90 miles of road being the first treated roads . Every road has a purpose and need as well as a history of use. 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 greatest risk to wildlife and habitat is wildfire. Harvesting and Timber sales also benefit the local economy.

Wildfire

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service 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. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

Economic Benefits

According to the Bureau of Economic Analysis, outdoor recreation had a record breaking year in 2021. Outdoor recreation now accounts for \$821 billion in economic activity. For reference, the oil and gas industry is \$812 billion. Outdoor recreation is popular. It is an economic juggernaut. A deeper dive into the numbers reveals that the engine driving this record-breaking growth is literally the millions of engines that find their way into the various forms of motorized recreation. Non-motorized forms of recreation account for \$33 billion in economic value. Gear that is used in all forms of recreation accounts for \$52 billion. Motorized forms of recreation account for a shocking \$78 billion in economic value. The Forest Service needs to strongly analyze and consider the economic impacts of having access to these roads within the project area.

Roads and Trails

This would be an appropriate use of categorical exclusion. Because public lands often are

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located in areas where natural disaster such as wildfire occurs frequently, the Forest Service should be able to address these safety concerns of hazardous trees as quickly as possible. BRC recognizes the Forest Service efforts to implement treatments on unsafe roads and there is most definitely a purpose and a need for this project to continue access within the forest. If there are any roads that are currently closed that also need treatment we recommend those roads be treated as well and opened to the public. It is not uncommon for categorical exclusions to be used when other infrastructure is damaged due to natural disasters. There is a purpose and need for these roads in the system and to maintain the health and vitality of the forest. The areas with these miles of road should be treated to prevent the “danger trees” from falling along the roads. BRC encourages treatment on the full 90 miles of roads.

Continued safe access on system roads is crucial for those with disabilities as well who rely on motorized access to enjoy these public lands. 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.

Forest fire is the greatest risk to wildlife and habitat therefore better access to treat the forests will help protect habitat and wildlife. Felling and removing hazardous trees will help prevent wildfire. Not only will roads help in achieving better vegetation management but roads also act as a natural fire barrier as well as provide access for emergency response teams. Although no new roads are proposed through this project, BRC recommends analyzing the purpose and need for increasing the amount of system roads.

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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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P.O. Box 5449
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brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, appearing to be 'B Burr', followed by a long horizontal line.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to be 'Simone Griffin'.

Simone Griffin
Policy Director
BlueRibbon Coalition