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Ben Burr, Executive Director

BlueRibbon Coalition
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February 9, 2023

Palouse Ranger District
Attn: Jeffery Lau Acting District Ranger
1700 Highway 6
Potlatch, ID 83855.

Dear Mr. Lau,

BlueRibbon Coalition (BRC) is writing to provide scoping feedback for the Longleaf 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 United States Forest Service. 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 Idaho. BRC members visit this region 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.

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Wildfire

Healthy forests are critical to public lands and the health and safety of users and the public. BRC believes beneficial forest management practices need to be used with the forests. Vegetation projects will help aid in these goals. We recommend using commercial treatment in the largest area possible. USFS needs to actively manage forests and move forward with regeneration harvest, commercial and non-commercial thinning, tree tipping, fuels treatments, snag creation, road work, and post-harvest planting in order to prevent catastrophic wildfire. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to the species. However, many conservation groups actively litigate forest projects that help mitigate wildfire risk. These same conservation groups are the ones who want to enact greater restrictions in order to protect species and critical habitat. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. BRC supports the proposed action, "The project proposal would implement the following management activities: approximately 1,812 acres of commercial harvest comprised of 1,605 acres of regeneration harvest and 207 acres of commercial thinning; and non-commercial vegetation treatments of approximately 1,488 acres of prescribed burning and both manual and mechanical fuel reduction activities"

Roads and Trails

We commend the USFS on this project for working to accommodate the increase of use by proposing road treatment. Ensuring safe and accessible roads is crucial for the USFS to properly manage these public lands. Road improvements should be made through this project to fulfill the 1987 Forest Management Plan. This land should benefit as many users as possible. All users can be accommodated through proper education or alternative management techniques. If any recreational use needs to be temporarily closed for the completion of the project, those areas and activities should be opened as soon as possible. Roads not only provide access to emergency response teams but also allow for continued maintenance access on the forest as well as acts as a natural fire barrier. We strongly encourage the USFS to consider the 27 miles of temporary routes or any administrative use roads being incorporated into the system to be open to recreation users as well. USFS should also analyze retaining the 5.4 miles of unauthorized routes to be permanently added into the road system in addition to the proposed 1.3 miles of routes. There is a purpose and need for these roads and all users should be able to responsibly enjoy them. We strongly discourage decommissioning or closing any roads. We hope that as the Forest Service implements the following from the project:

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“Determine long-term transportation needs including a road system that can be efficiently maintained while minimizing impacts to resources” that they will take into account the growing need of access on these lands and not limit themselves to a minimum road system. No routes should be decommissioned through the implementation of this project.

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

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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 Longleaf plan would disproportionately harm disabled users' ability to access public lands.

Any approach to 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 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 and the proposed new roads are carried out.

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

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brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'B' and 'B' followed by a long horizontal line.

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