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Ben Burr, Executive Director

BlueRibbon Coalition
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January 22, 2024

Nikki Swanson
Sweet Home Recreation Planner
4431 Highway 20
Sweet Home, OR 97386

Dear Ms. Swanson,

BlueRibbon Coalition (BRC) is writing to provide feedback for the Moose Mountain Road and Gordon Road Camping Closures environmental assessment. 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 Oregon or travel across the country to visit Oregon and use motorized vehicles to access USFS managed lands throughout Oregon. BRC members visit these areas 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

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

Dispersed Camping

BlueRibbon Coalition has seen an influx in dispersed camping interests over the past few years. There have been multiple management plans proposed throughout the nation that explore restricting free, primitive dispersed camping. BRC represents hundreds of thousands of users across the nation, many of which are dispersed campers. We have been working over the past few years to organize these users to have a voice in these dispersed camping plans and decisions. BRC created the Dispersed Camping Access Alliance in which we have educated users and participated in these planning processes to advocate for better management rather than closures of dispersed camping. The need for dispersed camping has increased and closures and restrictions do not reflect the needs and wants of the public. We have consistently opposed eliminating camping opportunities such as what is being proposed in the Moose Mountain and Gordon Road camping closures. As we have followed plans on USFS managed lands we have also followed studies that provide more information regarding the needs and wants of campers.

This plan should ultimately identify reasonable standards for allowing dispersed camping. According to The Dyr, 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. "In fact, members of our community went dispersed camping twice as often in 2021 as they did in 2020. The Dyr's four most saved campgrounds in 2021 were all dispersed campgrounds"¹ The number of people who use public land to camp is only growing every year. This data should be used by the USFS to accommodate users and recognize the need for continued dispersed camping opportunities. The USFS needs to strongly consider providing as many camping areas as possible as to not concentrate use in limited sites.

Active management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. We also support designating sites as a management tool to nudge the public into using those sites. We don't think it is necessary to prevent the continuation of open, free, primitive dispersed camping along the majority of designated routes in the area. Most campers will voluntarily choose to camp in the designated sites. BRC supports all recreational activities if done responsibly.

¹ <https://assets.thedyrt.com/2022-camping-report.pdf>

We appreciate that this plan is not recommending a fee and reservation system in place of dispersed camping as another study shows that reservation systems ultimately give advantage to upper-class users. Oftentimes marginalized groups do not have the luxury of making reservations that far in advance.² Another issue is those who make reservations and don't show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. The USFS should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system. According to this study on reservation systems in National Parks, "Results suggest that for each of the five campgrounds, those campers camping in sites that require reservations came from areas with higher median household incomes, on average."³ The study also concludes that the online reservation systems cater to primarily white users. The USFS should be aware of this study.

User Conflict

The identified concerns of, user conflicts, reduce safety concerns, reduce and/or eliminate health and sanitation issues associated with improper disposal of human waste and garbage, and resolve parking issues can be resolved through active management solutions. Closure is not management.

"User conflict" is an inappropriate and often misapplied concept that has generally been created and emphasized by anti-use advocates who are looking for any opportunity to restrict or eliminate use on public lands. Despite their aggressive litigation efforts, there are few, if any, court decisions that have forced an agency to restrict any motorized recreation based on alleged "conflict." Rather, the courts have generally upheld a reasoned agency conclusion designed to address any alleged "conflict." See, e.g., *Wild Wilderness v. Allen*, 871 F.3d 719, 728-729 (9th Cir. 2017); *Pryors Coalition v. Weldon*, 803 F.Supp.2d 1184 (D. Mont. 2011), *aff'd*, 551 Fed. Appx. 426 (9th Cir. 2013). There are many strategies that can be employed to manage the ever-growing human population that desires to recreate in the National Forest System. We generally support the concept of "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. There will always be a handful of pathologically disgruntled individuals seeking their

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https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data

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own private rejuvenation in the National Forests. These outliers should not dictate policy or use designations, and should be handled in a similar way as children testing parental boundaries.

Contrasted to those using “conflict” in a transparent effort to put a thumb on the scales of management balance, there are legitimate concerns that usually reflect the simple fact there are too many people trying to enjoy the same areas at the same time. These “conflicts” can occur within user groups or modalities as often as they occur between them. The agency should consider strategies to publicize and manage these situations. One option in the case of Moose Mountain and Gordon roads might be to designate new day-use sites, better signage and additional parking areas. Finally, we have always been and remain strong advocates of an active and effective enforcement program, so that users who violate or choose to remain criminally ignorant of management prescriptions suffer meaningful adverse consequences. All users need to understand and respect the fact that their use of our National Forests is a privilege to be shared with others under the terms established by applicable law.

Economic Benefits

Local communities rely on recreation and dispersed camping for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in these counties. The Bureau of Economic Analysis showed that in 2022 outdoor recreation brought in over \$1 trillion. Restricting dispersed camping would greatly hinder economic opportunity. Many local organizations and businesses recognize the influx of traffic and believe that any user conflict can be mitigated through better signage, more amenities, and education.

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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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