



BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
208.237.1008
brc@sharetrails.org

Ben Burr, Executive Director

BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

May 3, 2024

Dale Olson
Madison District Ranger
5 Forest Service Road
Ennis, Montana 59729

BlueRibbon Coalition (BRC) is writing to provide feedback for the South Tobacco Roots Vegetation Management Plan. 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 the state. BRC members visit the South Tobacco Roots management area for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, 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 increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

We support any additional comments that encourage the USFS to designate the maximum number of routes in this area as open. Many of our members are individuals and organizations with extensive on-the-ground experience. If any route or area specific comments are made which identify missing routes or errors in the maps that lead to restricted access, we support USFS addressing these comments and altering the proposed action to maximize motorized recreation access to the planning area.

Roads and Trails

We support providing the maximum number of routes and trails open to all users possible. No more routes or areas should be decommissioned or closed. In fact the USFS should strongly consider keeping as much area as possible open to recreation users so they are not concentrated in smaller areas to mitigate impacts that come from concentrated use. This land should benefit as many users as possible. BRC has strong concerns over the 22.8 miles of routes that are being proposed for decommissioning, closure or obliteration. The Forest Service recognizes that many of these routes provide access to dispersed camping sites and other recreational uses. We do however support the proposed maintenance on 36.7 miles and additional 1.3 miles of new routes.

BRC does not support the restoration of routes as all routes have been created for a significant reason. If there is a possibility that the route could cause harm to resources the route should be re-routed or the USFS should find adequate ways to manage the impact rather than closure. Land agencies are required to manage the land through proactive management and education and not hardwire closure as the correct first response to mitigate impact.

This plan should ultimately identify reasonable standards for allowing dispersed camping in the planning area. Keeping open roads will allow use for dispersed camping and help mitigate impact as campers won't be concentrated into small areas. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. BRC supports all recreational activities if done responsibly.

Economic Benefits

Local communities rely on motorized recreation for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in the South Tobacco Roots project area. Closing roads 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 and education. The Bureau of Economic Analysis shows that in 2022 outdoor recreation contributed \$1 trillion in economic revenue within the United States. This is not to be taken lightly and the USFS should allow local communities to capitalize on the growing popularity of motorized recreation as well as e-bike recreation.

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 have 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 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 this management plan would disproportionately harm disabled users' ability to access public lands.

Any approach to travel 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 for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.

Vegetation Treatments

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.

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
P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

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

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in dark ink, appearing to read 'Simone Griffin' in a cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition