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Methow Valley Ranger District  
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BlueRibbon Coalition (BRC) is writing to provide feedback for the Midnight Restoration 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 Forest Service. Many of our members and supporters live in Washington or travel across the country to visit Washington and use motorized vehicles to access Forest Service managed lands throughout Washington. BRC members visit the Okanogan Wenatchee National Forest 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 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 to keep forests healthy and reduce the risk of wildland fires. We recommend using commercial treatment in the maximum amount of land possible. Best available science should be used in making these decisions. Past forest fires such as the Crescent and Cedar Creek fires that have burned rampant because of the lack of forest projects should be looked at when making decisions. The removal of hazardous trees will benefit the overall future of the forest as well as aid in public health and safety.

Relying on wildfire to treat vegetation can greatly harm wildlife and habitat. Vegetation treatments that reduce wildfire risk might compromise the current scenery integrity or non motorized recreation opportunity, but if a wildfire happens the impact of the fire will likely cause a greater impact to both of these values. Decision makers should be able to make balance-of-harm or benefit determinations for these resource management activities instead of being required to meet arbitrary objectives.

The USFS should be using non-fire techniques such as mechanical thinning as often as possible to keep the forest healthy and thriving. These techniques are the most effective in preserving wildlife, trails and cultural sites. We support the proposed projects and commend the USFS in working to move forward. If any roads, trails or recreational areas need to be closed to implement these projects, they need to be reopened as soon as possible.

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 Forest Service 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

## **Dispersed Camping**

BRC believes that all users can and should be accommodated. This plan should ultimately identify reasonable standards for allowing dispersed camping. The decommissioning of routes will undoubtedly affect many forms of use including dispersed camping. According to The Dyr, a camping app, camping has grown immensely in the past few years. 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. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. Better facilities to address waste issues need to be created before any restrictions. BRC supports all recreational activities if done responsibly.

We are concerned that closing dispersed camping options through road closures and decommissioning will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance.<sup>1</sup> 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 a 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."<sup>2</sup> The study also concludes that the online reservation systems cater to primarily white users. The USFS should stop their proposals to limit free, primitive and dispersed camping as more and more research is showing that is discriminatory.

We support allowing dispersed camping and believe it provides a valuable user experience that the Forest Service should be protecting. Only allowing designated campsites would be detrimental to many users. While some may prefer a designated campsite, many prefer to find their own secluded area of nature to enjoy. Research shows that having an experience in nature where no one else has been has many mental and physical health benefits. Restricting dispersed camping will hinder these benefits. Outdoor recreation has grown incredibly the last few years because the public is starting to recognize the value that enjoying nature brings to your life. In fact, NASA claims that human exploration is innate and what leads to discovery.<sup>3</sup>

### **OSV Use**

Snowmobiling brings in \$26 billion annually in the United States, and locations within the Okanogan Wenatchee National Forest are high-value destinations for snowmobiling. The USFS needs to strongly consider the economic benefits of allowing the maximum amount of area open to OSV possible

BRC has concerns with the following: "this alternative would allow snowplowing concurrently on two roads in the Twisp River drainage (Figure 7). While this would potentially reduce

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<sup>1</sup>

[https://www.researchgate.net/publication/359329284\\_Exclusionary\\_Effects\\_of\\_Campsite\\_Allocation\\_through\\_Reservations\\_in\\_US\\_National\\_Parks\\_Evidence\\_from\\_Mobile\\_Device\\_Location\\_Data](https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data)

<sup>2</sup>

[https://www.researchgate.net/publication/359329284\\_Exclusionary\\_Effects\\_of\\_Campsite\\_Allocation\\_through\\_Reservations\\_in\\_US\\_National\\_Parks\\_Evidence\\_from\\_Mobile\\_Device\\_Location\\_Data](https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data)

<sup>3</sup> <https://www.nasa.gov/feature/the-human-desire-for-exploration-leads-to-discovery>

opportunities for snowmobiling while timber harvest and hauling were occurring, an extensive snowmobile trail system exists elsewhere on the Methow Valley Ranger District”.

Cross country travel needs to be analyzed in this area. If snowplowing would remove OSV use on these two roads in the Methow Valley Ranger District with at least equal mileage within this area also needs to be opened up for OSV use. Different areas although within the same district, provide different recreational value and need to be accommodated if there is a loss even if temporary.

According to the Winter Use Monitoring: Summary of Findings 2014-2020 from the National Park Service in Yellowstone<sup>4</sup> regarding the effects on OSV use on wildlife, there is not a significant impact. NPS states, “83% of the observed responses by all groups of wildlife were categorized as no apparent response, 11% look/resume, 3% travel, 1% attention/alarm, and 1% for flight and defense/charge combined.” Overexaggerated impacts to wildlife are often used to justify motorized closures. As the Yellowstone study suggests, most wildlife adapt to motorized users. In addition to this study, we recommend that the USFS include the findings found in the Snowmobile Fact Book published by the International Snowmobile Association.<sup>5</sup>

The following roads should allow for snowmobile use during winter months when snowfall is adequate. Users know their machines best and will not risk damage to the OSV’s therefore minimum snow depths and dates of use are arbitrary and unnecessary. Because these roads allow motorized use during summer seasons they should also ensure motorized snow use during winter seasons. The following should remain open for motorized use year round: Road 4410 from the junction with Rd 4410575 to the junction with Rd 4410200. Roads 4410500, 520, 522, 525, 530, 535, 575, 580, 400, 320, 450, 455, 460, 300, and 200.

### **Economic Benefits for Motorized Recreation**

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 Okanogan Wenatchee National Forest. Local groups have worked hard to put the area on the map so that they could reap the economic benefits. 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. It is important to note the influx of traffic is caused by the closure of other OHV areas and roads, therefore the USFS needs to

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<sup>4</sup> <https://www.nps.gov/yell/learn/news/21030.htm>

<sup>5</sup> <https://snowmobile.org/docs/isma-snowmobiling-fact-book.pdf>

provide as many areas as possible to these user groups.

According to the Bureau of Economic Analysis, outdoor recreation had a record breaking year in 2022. Outdoor recreation now accounts for over \$1 trillion in economic activity. For reference, the oil and gas industry is \$812 billion. Outdoor recreation is popular. It is an economic juggernaut.

Yet, public land agencies act as if this nearly \$1 trillion dollar industry is optional or an afterthought. Instead of building new roads, trails, campgrounds, and infrastructure to accommodate the new growth in outdoor recreation, land managers are relentlessly closing public lands for the public to use. It doesn't make any sense. 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.

There is an insufficient economic analysis regarding the economic impact in this EA. BRC would like to see a more thorough analysis done and provided to the public in order to really see the effects of closing areas and decommissioning as many routes as is being proposed.

### **Roads and Trails**

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 miles of road that is being incorporated into the system to be open to recreation users as well. 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.

BRC supports the expansions of Gilbert and south creek Trailheads to accommodate users and needs on the forest. We also support the following: "allow firewood collection in specific LSR areas that have been closed since 1994". Firewood collecting is crucial to local culture and history. Many people rely on firewood to heat their homes and this needs to be opened and allowed on as much forest land as possible. Decommissioning of routes however will affect firewood collection even with the proposal to open specific LSR areas.

The EA states, “No other recreation would be significantly impacted” regarding the impact on motorized recreation. Because no other form of recreation will be impacted it shows a complete bias towards the motorized community and those rely solely on motorized access to experience public lands.

BRC strongly opposes decommissioning and closing travel routes FSR 4400, 4300, 4435, 4420, 4300-300, 4410, 4410-500 and 4415. There is already such a small percentage of forest land that actually is affected by motorized use on roads that the USFS should not be minimizing that percentage even moreso. The USFS should be accommodating the growing use of motorized use rather than restricting it more so while the popularity is growing.

Roads are being closed or decommissioned due to grizzly bear core or security habitat. However, many studies show that roads don't significantly impact wildlife as we have seen in the Yellowstone study. Also, Bear 399 that resides in the Grand Teton National Park is considered the most famous bear in the world as it is often filmed on or near roads. It is known for its offspring and its old age. USFS is required to use best available science. The roads are not a deterrent to grizzlies and their reproduction.

### **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 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 BLM 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 Cow Mountain 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 BLM 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.

This plan blatantly shows that it is not considering disability access and users on equal grounds with able bodied users. The proposal reads, “Road segments identified for decommissioning to trail will be decommissioned in such a way that does not preclude their use for hiking, mountain biking, or horseback riding.” The USFS is wanting to ensure those who do not use a motor can still access many areas of the forest, however those who require a motor will not be able to access many areas of the forest if the proposed decommissioned and closed routes are approved.

### **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 maximum amount of acreage. 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. 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.

### **Public Health and Safety**

Experts and scientific experts support active management of our public lands in order to prevent wildfire as it is detrimental for various reasons for our public health and safety. “It is well documented that exposure to wildfire smoke is associated with adverse respiratory, cardiovascular, and birth outcomes, and premature mortality.”<sup>6</sup> Existing research supports the notion that historical fire suppression policies are insufficient for longer-term fire management.

Over the last three decades, the acreage burned annually by wildfire across the United States has doubled. This trend is driven by western states such as California, which experienced a fivefold increase in annual acreage burned from wildfire over the last half- century (Williams et al., 2019). Evidence shows increasing fuels management on public lands is the best way to reduce public health risks<sup>7</sup>.

“In the United States, the overall population experiencing wildfire smoke will continue to increase due to projected increases in wildfires. Considering climate change projections through 2050, it is estimated that more than 82 million people in the United States will be subject to a 57% and 31% increase in the frequency and intensity of smoke waves, respectively (Liu et al., 2016a).”

Another aspect of public health and safety is hazardous trees. Action to treat hazardous trees needs to be taken along every road within the forest. Oftentimes trees will fall and block access

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[https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse\\_wildfire-and-prescribed-fire-brief\\_final\\_2022.pdf](https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse_wildfire-and-prescribed-fire-brief_final_2022.pdf)

<sup>7</sup> <https://siepr.stanford.edu/publications/policy-brief/managing-growing-cost-wildfire>



to roads. These roads are used for emergency response teams as well as for administrative use to manage the forests and keep them healthy.

### **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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Sincerely,

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