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Central Coast Ranger District
130 Forestry Lane
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BlueRibbon Coalition (BRC) is writing to provide feedback for the North Fork Smith 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 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 Forest Service managed lands throughout Oregon. BRC members visit this land 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.

Dispersed Camping

BRC believes that all users can and should be accommodated. According to The Dyr, camping app, camping has grown immensely since 2019. The 2023 Camping Report cited that 80 million Americans went camping in 2022 and that campsites were nearly twice as scarce as they were in 2021. The number of people who use public land to camp is only growing every year. The number one issue that users identified was finding a place to camp. In a country with 640 million acres of public land in the United States, finding a place to camp shouldn't be the number one issue. This watershed restoration project should not be exacerbating the issue by closing an egregious amount of spur routes that lead to dispersed camping opportunities. Many of these routes provide a unique experience and high recreational value. 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. BRC supports all recreational activities if done responsibly. Decommissioning roads is ultimately restricting dispersed camping opportunities. These effects were not thoroughly analyzed within the EA.

Economic Benefits for Motorized Recreation

Local communities rely on motorized recreation and access to the forest for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in this area. Local groups have worked hard to put the area on the map so that they could reap the economic benefits. Closing and decommissioning 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 the closure of hundreds of miles of routes previously during travel management planning therefore the USFS needs to 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 2021. 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. As previously mentioned, the EA's analysis of the proposed road closures on the economic impacts and recreational losses are not sufficient. The agency cannot just close and decommission over 26 miles of routes without proper analysis and justification to the public. Road closures should not occur outside of the TMP process. BRC wants to ensure that abandoned road treatments don't lead to more road closures.

NEPA

The Forest Service is required to show a broad range of alternatives when undertaking a NEPA process. In order to adequately comply with NEPA the USFS must have alternatives that explore a range of alternatives. In the case of the North Fork Smith Restoration project. The proposal suffers from several deficiencies as it does not explore a true range of alternatives that meet the purpose and need. The Forest Service should be analyzing keeping all the temporary roads being built for public use as well as opening the roads for public use that will only be open for administrative purposes. The FS should also analyze adopting all the current routes on the ground into the system. USFS often creates a "conservation" alternative, then it is typical to present several other alternatives that include varying levels of closures and restrictions from the baseline. That USFS has conditioned itself to believe that it must never expand or enhance recreation access through the planning processes is an inherent and fundamental flaw of this process and a violation of NEPA. This inequitable privilege of one stakeholder's interest over the interests of other stakeholders taints the integrity of the NEPA process. USFS should form a range of alternatives where each of the alternatives accomplishes the goal of the project. The purpose and need of this plan is to create better management strategies, not to simply close and restrict use. Closure is not management. These areas provide a purpose and need for outdoor access that improves physical and mental health for public land users.

Roads and Trails

We commend the USFS on this project for working to accommodate the increase of use rather than implementing closures. 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 Forest Service to consider the miles of road that is being incorporated into the system temporarily or for administrative use 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. Many of these routes have existed and used generations before travel management for various uses such as camping, hunting and wood gathering that provide crucial resources to locals. Because funding is being used from the Bipartisan Infrastructure Act, we encourage the forest service to create fire breaks along the roads that are open as recreation motorized trails that allow a unique recreational experience compared to driving on the forest service roads.

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 such as this proposal, 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 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 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 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.

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.

If the method of prescribed burn 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. This should be the last mitigation effort the Forest Service uses to treat hazard fuels and vegetation. According to the Forest Service, cutting and burning together is the most effective to treating forests and creating a more resilient landscape¹. Cutting and burning should be the primary methods together on the entirety of the project area.

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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Sincerely,



Ben Burr
Executive Director
BlueRibbon Coalition

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Simone Griffin
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¹ <https://www.fs.usda.gov/detail/scnf/news-events/?cid=FSEPRD1191976>