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Chris Waverek, District Ranger
Challis Yankee Fork Ranger District
Salmon Challis National Forest

BlueRibbon Coalition (BRC) is writing to provide feedback for the Challis Backyard Trails Categorical Exclusion. 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, e-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 the Challis area 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 comments submitted by the state of Idaho Department of Parks and Recreation, Idaho State ATV/UTV and other comments 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 Challis Yankee Fork Ranger District in the future.

Project overview and summary of concern

This project proposes 34 miles of new non motorized trail construction seven miles west of Challis Idaho and identifies a categorical exclusion as the expected analysis type. BRC formally recommends withdrawal of the Proposed CE. It has been brought to our attention that the agency and the local collaborative originally envisioned a balanced mix of non motorized and motorized mileage (50/50) and that the current CE scope omits the motorized components that the collaborative was prepared to support. For this reason, BRC cannot support this proposal as it stands and recommends 50% of trails be developed for motorized use.

A categorical exclusion is not appropriate under these circumstances

The Forest Service must apply categorical exclusions only where no extraordinary circumstances exist and where the action fits within an established exclusion category. Federal regulation is explicit that a proposed action may be categorically excluded from further NEPA documentation only if there are no extraordinary circumstances related to the proposed action. This project is controversial among local stakeholders and state agencies, it would designate a sizable new trail network limited to non-motorized use only, and it would preclude motorized route construction and maintenance that local partners have proposed. Those facts together create the kind of circumstance where CE use is inappropriate and where an environmental assessment is required to ensure full analysis and public participation. The Forest Service project web page also notes that the CE approach proposed here is not subject to notice and comment rule making in the same way other actions would be, which further heightens the need for a more robust and transparent NEPA process in this case.

The CE excludes a major user group and will cause avoidable economic harms if adopted without fuller analysis

Requested action and specific recommendations

To address the concerns above and to ensure an outcome that best serves the public interest, BlueRibbon Coalition requests the following:

1. Withdraw the Proposed Categorical Exclusion for project number 68598 and do not issue a CE decision for the current scope that limits new trails to non motorized use only. The project record and the public record show controversy and a clear need for more analysis and collaboration.

2. Initiate an environmental assessment or other appropriate NEPA analysis that includes a range of alternatives including:
 - an alternative that adopts the collaborative Big Hill Garden Creek proposal and evaluates the originally conceived mix of non motorized and motorized mileage; and
 - an alternative that evaluates motorized single track trail construction with appropriate seasonal or site specific restrictions where resource concerns warrant.
3. Coordinate with Idaho Department of Parks and Recreation and the Idaho State ATV UTV Association on project design analysis funding opportunities and maintenance planning. IDPR has already recommended withdrawal of the CE and has documented the local collaborative proposal and state investments in this area. BRC supports IDPR's recommendation and urges Forest Service staff to engage IDPR and Idaho State ATV UTV Association early and meaningfully.
4. Analyze economic impacts to local communities from the removal of motorized opportunity under the current CE scope. Use available data including the University of Idaho OHV economic study and IDPR program information to quantify likely losses to local businesses lodging and fuel and to identify mitigation or design features that would distribute benefits equitably across user groups. The Idaho OHV study provides a defensible baseline for economic analysis showing large statewide economic contributions tied to motorized recreation.
5. If the agency retains a CE pathway for some elements of the project, document the findings of applicability and show with site specific detail that no extraordinary circumstances exist that would require further NEPA analysis. The statutory regulatory framework for CEs requires a no extraordinary circumstances determination before a CE can be applied. Where controversy or unresolved resource questions exist, the safe and legally sound approach is to prepare an environmental assessment.

Economic Benefits

Local communities rely on recreation 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. Many local organizations and businesses recognize the influx of traffic.

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. Motorized forms of recreation account for a shocking \$78 billion in economic value. These staggering figures should not be an afterthought for the USFS but should be included in any analysis and any alternative developed.

Motorized trail users are a major part of Idaho recreation and local rural economies. The University of Idaho economic analysis of Idaho OHV recreation found that in 2012 Idaho OHV households took nearly 1 million OHV trips and spent approximately \$434 million in the state, consisting of about \$186 million in trip expenditures and \$248 million in capital purchases. Those figures demonstrate that motorized recreation is a substantial economic engine for Idaho communities and that removing motorized opportunity from a planned new trail network will shift economic benefits away from businesses that depend on ATV UTV and motorbike visitation.

Roads and Trails

This land should benefit as many users as possible. All users can be accommodated through proper education or alternative management techniques. Motorized routes not only provide access to emergency response teams but also allow for continued maintenance access in the project area as well as acts as a natural fire barrier.

Consistency with Federal Law and Executive Direction

The proposed CE is also inconsistent with recent federal policy directives that prioritize public access, recreation infrastructure, and multiple-use planning on federal lands. Congress passed the Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act in 2025 with overwhelming bipartisan support. The Act directs federal agencies to expand recreation opportunities, modernize and maintain recreation infrastructure, and ensure access for all forms of recreation including motorized use. A CE that only advances non motorized trail mileage without consideration of motorized alternatives conflicts with the intent of the EXPLORE Act and risks foreclosing opportunities for balanced trail systems that the law envisions.

In addition, the President's Executive Order Establishing the Make America Beautiful Again Commission (July 3, 2025) directs federal land management agencies to prioritize deferred maintenance, invest in recreation infrastructure, expand access, and enhance domestic use of public lands. The EO emphasizes that outdoor recreation is an essential public benefit that supports both conservation and economic vitality. Proposals such as the Challis Backyard Trails CE, which exclude motorized trail opportunities and therefore exclude state partners like IDPR

and Idaho State ATV/UTV Association, undermine the federal direction to expand access and address user needs comprehensively.

Ebikes

BRC encourages the allowance of all classifications of e-bikes on current and proposed trails non-motorized mountain biking trails. Education and outreach should always be the first response if USFS confirms there is an issue regarding public safety, wildlife or soil impacts.

Technological developments already exist for the latest models of e-bikes to allow for conversion between the different classes. Because of this, the class system will likely become obsolete in just a few short years. Managers should focus on riding behaviors and actual environmental impacts in how they regulate biking on the trails. For example, a speed limit is more reasonable and enforceable than determining which class setting is currently being operated on an e-bike. Not allowing e-bikes at all, would also be problematic. The innovation happening around electronically assisted and powered bikes is almost impossible to predict, and it is likely that any rigid regulatory alternative that is selected will become obsolete and exclusionary. USFS should consider modifying alternatives to contemplate accommodating new technological developments and managing the Challis Backyard Trails. E-bikes on human powered bike trails don't have a significant difference in impact according to recent studies.¹

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