



BlueRibbon Coalition
800 W Main St Suite 1460
Boise, ID 83702
208.237.1008
brc@blueribboncoalition.org

Ben Burr, Executive Director **September 25, 2026**
800 W Main St Suite 1460
Boise, ID 83702

Attn: Jesse Creek Transmission Line Fuel Break
Heather DeGeest, Forest Supervisor
c/o Nathan Meyer
Salmon-Cobalt Ranger District, Salmon-Challis National Forest
311 McPherson St
Salmon, ID 83467

Introduction

BlueRibbon Coalition (BRC) is writing to provide feedback on the Jesse Creek Transmission Line Fuel Break Project ("Project").¹ 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 Idaho or travel across the country to visit Idaho and use motorized vehicles to access Forest Service managed lands throughout Idaho, including the Salmon-Challis National Forest. 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 motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

¹Salmon-Challis National Forest, Jesse Creek Transmission Line Fuel Break, Project No. 395610, <https://www.fs.usda.gov/r04/salmon-challis/projects/395610>.

The Forest Service proposes a linear fuel break of up to 1,000 feet in width, not to exceed 3,000 acres, along the Idaho Power transmission line and Forest System Roads 65002 (Leesburg Stage), 60707 (Morning Glory), and 65001 (U.P. Lake), from the Salmon-Challis administrative boundary west to Forest System Road 60020 (Ridge Road), on the Salmon-Cobalt Ranger District west of Salmon.² Treatments would include ground-based harvest, mastication, and removal of economically valuable timber, with access from existing roads, normal road maintenance, and temporary roads that would be decommissioned after the project.³ The Forest proposes to authorize the Project under the categorical exclusion for fuel breaks that Congress established in Section 40806 of the Infrastructure Investment and Jobs Act (IIJA), together with a project-specific Forest Plan amendment waiving visual quality objectives.⁴

BRC supports the Project. We also ask the Forest Service to use this investment in a linear corridor along existing roads to plan for a designated motorized trail for motorcycles, ATVs, and UTVs along the fuel break. A trail in that corridor would add recreation opportunity, and it would also give crews and firefighters ongoing access to maintain and use the fuel break.

Summary of BRC's Requests

1. Proceed with the Project.
2. Evaluate a designated motorized trail within or along the fuel break corridor, and design the fuel break and temporary road decommissioning so that a trail remains an option.
3. Protect existing MVUM roads and trails in and next to treatment units, keep Leesburg Stage, Morning Glory, U.P. Lake, and Ridge Road open to the public, and disclose any temporary closures in advance.
4. Make personal-use firewood available from fuel break material where practicable.
5. Apply Executive Order 14408, Section 127 of the EXPLORE Act, and the pending travel management rulemaking to access decisions associated with the Project.

BRC Supports the Proposed Fuel Break

The scoping notice explains that the fuel break is intended to reduce wildfire spread and intensity, protect the community of Salmon and nearby infrastructure, reduce the risk of a fire starting from a transmission line failure, and reduce wildfire impacts to the Salmon Municipal

²Salmon-Challis National Forest, Scoping Notice, Jesse Creek Transmission Line Fuel Break (Aug. 27, 2026), at 1–2, <https://usfs-public.box.com/s/mxr3jsizlcwk74zydymyhf6z8uki1tkj>.

³*Id.* at 2–3.

⁴*Id.* at 1, 4.

Watershed.⁵ BRC supports these goals. Linear fuel breaks along existing roads and utility corridors are an efficient way to reduce wildfire risk, because they build on features that already exist, and they give firefighters safer places to work. BRC also supports the project-specific amendment waiving visual quality objectives for this Project. A fuel break that cannot remove enough vegetation to change fire behavior does not do its job.

A catastrophic fire in this landscape would affect far more than the transmission line. It would close the roads and trails the public uses to reach this part of the Salmon-Cobalt Ranger District, potentially for years. Reducing that risk protects recreational access.

Congress Authorized and Funded Fuel Breaks Along Roads

In the IIJA, Congress created a categorical exclusion for forest management activities whose primary purpose is “to establish and maintain linear fuel breaks” up to 1,000 feet wide “contiguous with or incorporating existing linear features, such as roads, water infrastructure, transmission and distribution lines, and pipelines.”⁶ Congress also directed the Forest Service to facilitate “participation of interested persons” during preparation of each such project.⁷ Congress backed that authority with funding. Section 40803 made \$500,000,000 available “for developing or improving potential control locations . . . including installing fuelbreaks . . . with a focus on shaded fuelbreaks when ecologically appropriate,” split evenly between the Departments of Agriculture and the Interior.⁸

Neither provision addresses recreation, and BRC does not suggest that the categorical exclusion itself authorizes trail construction. But the statute’s focus on establishing and maintaining fuel breaks along existing roads, and on shaded fuel breaks that keep an overstory canopy, describes a corridor that can also hold a trail. A fuel break is only useful as long as it is maintained and reachable. Planning for recreational use of the corridor now, while the Forest is designing the fuel break, costs far less than trying to add a trail after the fact.

A Designated Motorized Trail Along the Fuel Break

The Project’s proposed action map shows roads open to all vehicles and trails open to wheeled vehicles 50 inches or less in width near the proposed treatment units.⁹ The fuel break will create a continuous, cleared, and maintained corridor alongside Leesburg Stage, Morning Glory, and U.P. Lake roads. BRC asks the Forest Service to:

⁵Scoping Notice at 1–2.

⁶Pub. L. 117-58, div. D, tit. VIII, § 40806, 135 Stat. 1110 (2021), codified at 16 U.S.C. § 6592b(c)(1).

⁷16 U.S.C. § 6592b(f)(2).

⁸Pub. L. 117-58, div. D, tit. VIII, § 40803(c)(14), codified at 16 U.S.C. § 6592(c)(14).

⁹Scoping Notice at 5 (Figure 1, Proposed Action Map).

1. Evaluate a designated trail for motorcycles, ATVs, and UTVs 50 inches or less in width within or along the fuel break corridor, connecting to the existing trail and road system shown on the Motor Vehicle Use Map (MVUM). A trail separated from the road would let OHV riders travel the corridor without sharing the road with log trucks, passenger vehicles, and utility traffic.
2. Recognize the fire management value of a designated trail. A trail provides ground access for the maintenance the fuel break will need over time, and it gives crews an existing route for access and holding during suppression and prescribed fire.
3. Design fuel break treatments, landings, skid trails, and slash disposal so that they do not foreclose a future trail alignment, and identify segments of the corridor suitable for a trail in the project record.
4. Where a temporary road alignment would make a good trail, decommission it in a way that preserves that option. The statute requires that temporary roads be decommissioned within three years of project completion,¹⁰ and decommissioning a road built for vehicles wider than 50 inches is compatible with managing a narrower route as a trail.

BRC recognizes that designating a new motorized trail requires its own analysis and a decision under the travel management regulations at 36 CFR Part 212, Subpart B. We ask the Forest to begin that work alongside this Project, or to commit in the decision memo to evaluating a trail in the district's next travel analysis, using the information this Project generates. The Project area overlaps the Jesse Creek Idaho Roadless Area.¹¹ The Idaho Roadless Rule does not prevent a trail: it defines a road as "a motor vehicle route over 50 inches wide, unless identified and managed as a trail," and leaves decisions about trails to "the applicable travel management process."¹² BRC and its members would welcome the chance to work with the Forest, Lemhi County, and the Idaho Department of Parks and Recreation's OHV program on planning, building, and maintaining such a trail.

Protect Existing Roads and Trails

BRC supports the Project's reliance on existing Forest System roads and the normal road maintenance described in the scoping notice, including brushing and surface maintenance, and its commitment that no new permanent roads will be built.¹³ BRC asks the Forest Service to:

¹⁰16 U.S.C. § 6592b(e)(3).

¹¹Scoping Notice at 1.

¹²36 CFR 294.21, 294.26(a).

¹³Scoping Notice at 3; see also 16 U.S.C. § 6592b(e)(1)–(2).

1. Keep Forest System Roads 65002, 60707, 65001, and 60020 open to the public after the Project, and leave them in as good or better condition than before operations.
2. Identify every MVUM road and trail inside or crossing treatment units on project and contract maps; prohibit skid trails, landings, and slash piles on designated trail tread; and restore any trail tread damaged by operations.
3. Confirm that decommissioning temporary roads will not block, obliterate, or close any MVUM road or trail, and that any change to the designated system will go through the travel management process.
4. Disclose any temporary closures during operations, including location, duration, and how the public will be notified, and schedule operations to limit conflict with hunting seasons where practical.

Firewood

The categorical exclusion expressly includes “selling of vegetation products, including timber, firewood, biomass, slash, and fenceposts.”¹⁴ BRC asks the Forest to make personal-use firewood available from fuel break material where practicable, including decked material at landings along open roads. Personal-use firewood is a common reason local families drive forest roads, and making that material available reduces burn-pile volume and smoke.

The Project Aligns With Current National Access Policy

The Department is revising the travel management regulations at 36 CFR Part 212. Its August 24, 2026 Notice of Intent proposes a national presumption that existing roads and trails are “open to appropriate public use unless closure or restriction is required by applicable law, valid existing rights, or another governing instrument, or is supported by specific, documented and justifiable reasons.”¹⁵ 91 Fed. Reg. at 54,687. The Notice implements Executive Order 14408, Removing Unnecessary and Counterproductive Restrictions on Access to Federal Lands, and Section 127 of the EXPLORE Act (Pub. L. 118-234), which, as the Notice describes it, directs the Secretary to “seek to create additional opportunities, as appropriate and in accordance with existing law, for motorized and non-motorized access and recreation.” *Id.* at 54,689.

A fuel break corridor along existing roads, built and maintained with public funds, is the kind of opportunity Section 127 describes. BRC asks that the Forest treat any closure of existing roads

¹⁴16 U.S.C. § 6592b(c)(2)(D).

¹⁵Travel Management; National Forest System Lands, Notice of Intent, 91 Fed. Reg. 54,686 (Aug. 24, 2026).

or trails associated with the Project as a restriction that must be specific, documented, and time-limited, and that it consider the trail proposal above in light of this direction.

Administrative Review

The legal notice states that the Project and its plan amendment are categorically excluded and “are not subject to objection under 36 CFR 219.51 or 36 CFR 218.23.”¹⁶ Because this comment period is the only opportunity for public input before a decision, BRC asks the Forest Service to respond to the requests above in the decision memo, to keep BRC on the project mailing list, and to notify BRC directly when a decision is issued.

Conclusion

BRC supports the Jesse Creek Transmission Line Fuel Break and encourages the Forest Service to move it forward. Congress authorized and funded linear fuel breaks along roads to protect communities and infrastructure. Designing this fuel break so that it can also carry a designated motorized trail would make the most of that investment, give crews lasting access to maintain the break, and expand recreation opportunity on the Salmon-Cobalt Ranger District. 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 non-motorized recreation use often overlap as OHVs 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.

Sincerely,



Ben Burr
Executive Director
BlueRibbon Coalition



Simone Griffin
Policy Director
BlueRibbon Coalition

¹⁶Salmon-Challis National Forest, Legal Notice, Scoping and Opportunity to Comment, Jesse Creek Transmission Line Fuel Break (Aug. 27, 2026), <https://usfs-public.box.com/s/mxr3jsizlcwk74zydymyh6z8uki1tkj>.