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First name: Ben

Last name: Burr

Organization: BlueRibbon Coalition, Inc

Title:

Comments: Please see our comment on Forest Order Camping Restrictions #60520 attached.

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Ben Burr, Executive Director

BlueRibbon Coalition

P.O. Box 5449

Pocatello, ID 83202

Nicholas Baggett

United States Forest Service

1755 Cleveland Highway

Gainesville, GA 30501

Introduction

BlueRibbon Coalition/ShareTrails (BRC) is a national non-profit organization that advocates for responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands 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 other recreationists, public lands officials, and natural resource managers. Our membership includes over 700,000 motorized recreationists, hikers, camping enthusiasts, equestrians, rock hounders, mountain bikers, and other public land users who regularly access and enjoy recreating on state and federally managed areas throughout the United States.

Many of our members live and/or recreate in Georgia, including Chattahoochee-Oconee National Forest, and have definite, concrete plans to continue such use in the future. In addition to participating in general motorized recreation, hiking, nature and wildlife study, and other similar activities in the Chattahoochee-Oconee National Forest, most of our members are also avid campers who work to follow and educate the public regarding responsible camping practices.

As an organization, we have found travel access via motorized vehicles and dispersed camping opportunities to be key to the accessibility, experience, and optimal use of public lands for recreationists and public lands users across the board. Additionally, our research and efforts in public lands have revealed that appropriate public lands use and ecological management are most effectively balanced and harmonized by creative management practices that open resources to match public demand and that address specific behaviors over the

implementation of restrictive closure practices, which only serve to bottle neck increasing demand for appropriate access to public lands and thereby exacerbate existing problems. Our organization hopes to see public lands management which implements such creative practices to the ends of preserving ecological health and sustainable public access for generations to come.

Comments

BlueRibbon Coalition recognizes the need for public lands agencies to be able to implement new forest orders as new situations arise, and we support the necessary management of waste buildup, genuine user conflict on public lands, erosion, and other concerns which may arise due to irresponsible recreation and camping practices. However, we are concerned that the current proposed order could punish a larger community of responsible users and would like to suggest alternatives which could more effectively address existing problems through targeted regulation.

The justification for restricting dispersed camping through length of stay regulations is almost always given in reference to an explosion in demand for dispersed camping. Land managers should be striving to meet an increase in demand with increase in supply for dispersed camping opportunities. More often than not, they respond to increased demand and use through restriction of supply. This only concentrates use in the areas that are left open [ndash] restricting overall access further and frequently increasing impacts in those open areas.

A 14-day limit can be justified in some situations, and we[rsquo]d prefer to see a managed dispersed camping experience instead of closures of sites or areas. We have seen our members and supporters both express support for these limits and express opposition to these limits.

36 CFR 261.50(e) allows the USFS to manage stays longer than 14-days through a permitting process, and a move towards length of stay restrictions can be balanced by increasing availability of extended stay permits for those willing to comply with the permit requirements. If the USFS decides to implement length of stay restrictions, the educational materials and outreach involved in publicizing the new restrictions should also include information on how to qualify for and participate in the exempted extended stay permits contemplated by Agency CFRs.

Not all users who want to camp longer than 14 days engage in illicit activities or cause environmental impacts that can[rsquo]t be mitigated. Illicit activities are almost always already against the law and local regulations. Responsible users shouldn[rsquo]t be punished for the behavior of irresponsible users through over-broad restrictions that merely and often ineffectively hedge against negative environmental impacts rather than directly addressing them. Many of those who engage in full-time dispersed camping are retirees living on fixed incomes or high-income participants in the surging remote-work and gig-work economy. As such they are becoming an integral part of the economic activity of local rural economies. 36 CFR 261.50(e)(5) allows forest managers to exempt [ldquo]Persons engaged in a business, trade, or occupation in the area[rdquo] from prohibitions of a USFS order [and proper implementation of this exemption should include these retirees and remote work force.]

We further find the reinstatement of a 14 day stay limit to be impracticable in its presently proposed form. Implementing length of stay requirements will require increased law-enforcement presence to document site usage, and therefore presents a challenge in enforceability. The proposal for the order didn[rsquo]t speak to USFS plans to allocate the necessary resources to enforce the new restrictions.

Closures and restrictions like length of stay regulations are often blunt instruments to address environmental impacts. For example, the same law enforcement presence that would be required to enforce length of stay regulations could just as easily enforce littering and human waste disposal impacts. There[rsquo]s no need to enforce restrictions on everyone when targeted enforcement of those causing higher levels of impact would successfully mitigate the impacts. Often, length of stay restrictions are designed to target impacts from crowding and open availability of dispersed camping sites in popular areas to new users. If use of an area is in high

enough demand to justify length of stay restrictions, land managers should also consider opening new areas for dispersed camping. With hundreds of millions of acres of public land, there should be enough space to meet the surging demand for dispersed camping opportunities.

We also believe that responding to increased demand with increased closures and regulations fails to appropriately meet underlying needs and manage root problems. The experience of being able to camp for free for an extended period of time is an experience that is valued by an increasingly growing number of people, and the number of places where that sort of recreation is available is becoming increasingly limited due to overregulation. Rather than attempting to get rid of offenders and potential offenders by closing or limiting access to an area, we would recommend that additional areas be analyzed for new access, that new authorized roads be built, and that the addition of trash collection bins and sewage dump stations, bathrooms, and other facilities be explored. It should also be noted that those who camp for less than the proposed length of stay restrictions are equally capable of leaving the same impacts as those who stay longer. Where offenses such as littering, improper disposal of human and pet waste, etc., have taken place, educational information and fines ought to be implemented.

Access protection and targeted management are preferable over restrictions and limitations especially during this time when overlanding, boondocking, vanlifer, and dispersed camping are exploding in both popularity and public need due to broader public health and economic challenges resulting from the COVID-19 pandemic. In the few instances where long term camping on public lands has in fact negatively impacted ecological systems through erosion damage in riparian areas, these impacts can be more effectively addressed through targeted regulations in precise locations rather than across an entire land management area.

While reports from our own membership indicate that genuine user conflict between campers vying for spots is rare, we do recognize that with growing demand, user conflict could potentially exist and particular campsites could become competitive. Where this is truly the case, we would recommend that such user conflicts be addressed through site-specific analysis, rather than with an overbroad order which unnecessarily hampers the experience of other recreationists.

Conclusion

We would like to conclude by saying that we support access to CONF for all recreation user groups. As long as overall visitation numbers are appropriate for the affected resources, the activities of campers and other recreationists can be compatible with one another and the environment. Where visitation numbers are excessive, we believe that opening additional areas ought to be carefully considered by public land management agencies. We also believe that responsible development of additional trail systems and camping facilities within the existing area and in new areas will relieve environmental impacts and contribute to general public health and responsible recreation.

BRC would like to be considered an interested public for this proposed order. 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,

Ben Burr

Executive Director

BlueRibbon Coalition

brben@sharetrails.org