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Comments: Attached letter text:

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the 2020 Fire Affected Road System Project Proposal. 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, snowmobiles, and hiking to enjoy federally managed lands throughout Oregon, including those of the 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 USFS managed lands throughout the state. BRC members visit these areas 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.

Organized Events

Many of our members hold organized events that include organized rides in this area. A significant portion of the education mission of organizations like ours and the fundraising that supports organizations like ours comes from these organized events, and we see the continuation of these events as an integral expression of protected rights including freedom of speech and freedom of assembly. We believe these events are protected by the First Amendment and believe they are crucial to clubs and organizations. We also believe that the commercial guided tour companies provide crucial education about accessing the area, and their feedback should be given extra consideration in this scoping process. Our discussions with several of these companies suggest that the construction of new routes would considerably improve the user experience and enhance the recreation qualities of this area.

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 that have burned rampant because of the lack of forest projects should be looked at when making decisions. If prescribed burns are 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.

Roads and Trails

BRC commends the USFS in their efforts to have a sustainable and healthy forest for all to use while improving access and roads in the system. Oftentimes we see vegetation projects used as a method to close or decommission roads and we believe removing hazardous trees are necessary for the safety as well as health of the forest. We strongly encourage the USFS to fully analyze and consider adapting any current road into the Forest Service system. These roads will offer long term benefits to the forest. Decommissioning or closing trails should not be a result of this project. Roads act as a natural fire barrier and provide needed access to implement projects and for emergency response teams.

Economic Benefits

Roads are crucial for various reasons, not only do they act as a natural wildfire barrier to help protect the forests and protect wildlife and habitat but are also needed for fire treatments and emergency response teams. The Bureau of Economic Analysis showed that in 2019 outdoor recreation brought in \$459.8 billion. Outdoor recreation has only grown in popularity since then. BRC supports restoring access to the forest to benefit local economies. Not only will the proposed projects benefit the economy by providing a conducive environment for outdoor recreation but will also bring in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit. We also support any timber sales as this aides in forest health and provides good, local jobs.

Conclusion

We would like to close by saying we support [ldquo]shared use[rdquo]. 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[rsquo]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.Sincerely,

Ben Burr, Executive Director, BlueRibbon Coalition

Simone Griffin, Policy Director, BlueRibbon Coalition

[Sharetrails.org](https://sharetrails.org)