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Comments: Please find attached our comment for the Youngs Rock Rigdon EIS

August 23, 2021

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Introduction

BlueRibbon Coalition (BRC) is a nationwide organization representing over roughly 700,000 motorized recreationists, equestrians, mountain bike enthusiasts and resource users who regularly access and enjoy recreating on and responsibly accessing resources on state and federally managed lands throughout the United States. 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 by working collaboratively with other recreationists, public lands officials, and natural resource managers. We work with land managers to provide recreation opportunities, preserve resources and promote cooperation with other public land users.

Many of our members and supporters live and or recreate in Oregon and its adjoining states, including the Upper Middle Fork Willamette Watershed area and have definite, concrete plans to continue such use in the future. As an organization, we have found access travel 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 address specific behaviors over restrictive closure

practices which only serve as a bottle neck for increasing demand for appropriate access to public lands and thereby exacerbating 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. With these goals in mind, we ask that the following comments and suggestions be carefully considered.

Comments

We applaud the efforts of public officials to preserve our public lands through appropriate fuels and wildfire management practices and support the commercial thinning, regeneration harvesting, gap creation, and other preventative maintenance procedures proposed in the document and in the preferred alternative (Alternative 2). We also wish to express our support for the recurring erosion maintenance, trail reconstruction, floodplain restoration, and other commonsense procedures proposed in the primary document and in the preferred alternative.

We further support the general goal expressed in Alternative 2, [ldquo][hellip]to meet current and projected user needs while reducing resource impacts and promoting sustainable management.[rdquo] As the original plan and various plans are considered, we strongly urge the adoption of the preferred Alternative 2 over Alternative 3, which would unnecessarily decommission eight additional miles of road and hamper beneficial and responsible public use. As plans are considered, we support all efforts to carefully manage rather than close public lands wherever possible.

In the specific implementation of the above quoted goal taken from Alternative 2, we have several comments and critiques that would greatly improve the outcomes of future management. While we support the construction of roughly 800 feet of new trail to connect Forrest Road 2100-276 to the existing Middle Fork National Recreation Trail, we wish to express that this area be specifically designated as open to motorized use. In the language for Alternative 2, Forrest Road 2100-276 has been designated for conversion into a non-motorized trail and the permitted uses of the connector trail has not been clearly specified. We urge that both be made open to motorized use for general public access and that the connector trail[rsquo]s use be referenced more clearly within the document.

We have strong reservations about proposals to close dispersed camping sites where the FS acknowledges, [ldquo]Many of these sites are high use, and several are large capacity, capable of accommodating several vehicles or trailers at once.[rdquo] As 12 dispersed campsites within the floodplain of the Middle Fork Willamette River have been designated for closure in Alternative 2, we strongly suggest that the road spurs to be constructed for timber harvesting purposes be left open for recreational use rather than rehabilitation. These road spurs would make ideal dispersed camping sites, would meet the need to address increasing demand, decrease ecological impacts by spreading users across broader areas, and would result in minimal impact[mdash]particularly as compared to the ecological impacts of timber harvesting which would already be permitted in these areas. We also suggest the FS look for ways to mitigate impacts to the floodplain caused by dispersed camping through management instead of closure.

We support the FS position that the entire area is open to dispersed camping, but the substantial decommissioning of roads and moving roads into storage will functionally close the areas accessed by these roads. We believe the FS should reevaluate its minimal road system. With over $1 trillion of infrastructure spending working its way through Congress, the FS should wait to see if any of these funds can be used towards maintaining the roads in the area.

It should also be noted that many offroad users enjoy roads that aren[rsquo]t perfectly maintained as long as they are passable as they create a different type of recreation experience. The FS acknowledges that SXS off-road travel is increasing in popularity in the area, but the plan seems to ignore or reject the purposes and needs of this

growing recreational use. Many offroad groups are well-organized and would be willing to assist the FS with maintenance activities through volunteer agreements. There doesn[rsquo]t appear to be evidence of any efforts made to engage these user groups to support their use of the forest. An assessment of the potential for volunteerism should be made to determine if the minimum travel system can include more mileage of roads.

Conclusion

We would like to conclude by saying that we support access to this and other state and national resources 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, particularly as creative management practices are implemented and additional resources, such as the proposed horse trailer turnarounds and parking areas to be constructed along Middle Fork National Recreation Trail and Road 21 in the preferred alternative. 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 project. Information can be sent to the following address and email address:

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Sincerely,

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