



BlueRibbon Coalition
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Ben Burr, Executive Director

June 29, 2022

BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

McCall Ranger District
ATTN: Mike Beach, Recreation Program Manager
102 W Lake St
McCall, ID 83638

Dear Mr. Beach,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the North Fork Divide Recreation Project. 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 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. 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.

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Dispersed Camping

BRC believes that all users can and should be accommodated. This plan should ultimately identify reasonable standards for allowing dispersed camping. According to The Dyrtr, a camping app, camping has grown immensely since 2019. Public lands are needing more camping facilities than ever before as almost 50% of campers are new campers. The number of people who use public land to camp is only growing every year. The USFS needs to strongly consider providing as many camping areas as possible as to not concentrate use in limited sites. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. Better facilities to address waste issues need to be created before any restrictions. BRC supports all recreational activities if done responsibly.

We are concerned that closing dispersed camping options will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance.¹ Another issue is those who make reservations and don't show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. The USFS should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system. According to a study on reservation systems in National Parks, "Results suggest that for each of the five campgrounds, those campers camping in sites that require reservations came from areas with higher median household incomes, on average."² The study also concludes that the online reservation systems cater to primarily white users. The USFS should stop their proposals to limit free, primitive and dispersed camping as more and more research is showing that is discriminatory.

Economic Benefits

Local communities rely on motorized recreation and dispersed camping for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in these counties. The Bureau of Economic Analysis showed that in 2019 outdoor recreation brought in \$459.8 billion. Restricting dispersed camping would greatly hinder economic opportunity. Many local organizations and businesses recognize the influx of traffic and believe that any user conflict can be mitigated through better signage, more amenities, and education.

¹

https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data

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Categorical Exclusion

BRC believes this project needs to go through the NEPA process and this is not an appropriate project for categorical exclusion. The Forest Service is required to show a broad range of alternatives when undertaking a NEPA process. In order to adequately comply with NEPA the USFS must have alternatives that explore a range of alternatives. Closure is not management. These areas provide a purpose and need for outdoor access that improves physical and mental health for public land users.

Users with Disabilities

We recommend that the USFS use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states, “Public land visitation data collected from the Department’s bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large.” This includes persons with disabilities and limited physical access. This project proposal will help increase access within this area and is a positive step in the right direction.

On his first day in office, President Joe Biden issued an “Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.” This executive order established “an ambitious whole-of-government equity agenda” which focuses on addressing “entrenched disparities in our laws and public policies,” and mandates a “comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.”

Under this executive order, “The term ‘equity’ means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities....” Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Management policies focused on “minimizing” the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other “human powered” and “quiet use” forms of recreation in which many people with disabilities are unable to participate.

Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the USFS has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.

The Biden Administration’s focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The USFS is therefore required by this executive order and others mandating that federal agencies consider “environmental justice” in NEPA proceedings to consider whether any route closures in the North Fork Divide Recreation plan would disproportionately harm disabled users’ ability to access public lands.

Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the USFS consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.

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

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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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Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized, overlapping letters that appear to be 'B' and 'B', followed by a long horizontal flourish.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, written in a cursive style, appearing to read 'Simone Griffin'.

Simone Griffin
Policy Director
BlueRibbon Coalition