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BlueRibbon Coalition (BRC) is writing to provide feedback for the Railroad Saddle Project Environmental Assessment. 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 Payette National Forest. 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 the Payette National Forest area for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, 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.

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 and treating the full 24,915 acres of project area. 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. Wildfire is the greatest threat to wildlife and habitat as well as future closures. The Forest Service needs to pursue active management to ensure healthy public lands so the maximum number of people can continue to responsibly enjoy. The EA states that [ldquo]roads can have a major impact on watershed integrity[rdquo] as well as timber projects. Route reductions are being proposed being of the impact that roads are claimed to cause. However, the largest threat to to watersheds and the forest is wildfire. Maintaining routes which will aid in forest treatment projects will ultimately protect watersheds and other forest resources.

The plan states a possible method to use is prescribed burns. If this method is 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.

Commercial Harvest

Timber harvest, commercial forest projects and any sales from forest treatments will also help stimulate the local economy. We believe the USFS should move forward with timber harvest on the full proposed acreage. The proposed project provides local jobs and brings in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit. Wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. BRC also supports winter timber harvest. Temporary roads needed for the completion of forest harvesting need to be analyzed to be added into the forest road system permanently.

Roads and Trails

BRC commends the USFS in their efforts to have a sustainable and healthy forest for all to use. Road and trail management need to be a priority. Assigning low, medium and high risks are very subjective and as the USFS has analyzed roads for existing purposes what one user may believe has high recreational value a Forest Service agent may not. All existing roads have a history of use and provide different recreational value and importance to different users. All 353 miles of routes should be retained as well as the 10 miles of singletrack routes. Each of these routes provide unique experiences. 9 miles of routes per every square mile is still very minimal and allows the majority of the forest to still be in its [ldquo]natural state[rdquo]. Any road proposed to be decommissioned or closed after the completion of the project should be seriously considered for long term use. These roads will offer long term benefits to the forest. There is clearly a purpose and need for these miles of road and the USFS should maintain them and not close them.

BRC does not support the restoration of routes as all routes have been created for a significant reason and serve a purpose and need. If there is a possibility that the route could cause harm to resources such as watersheds, the route should be re-routed or USFS should find adequate ways to manage the impact rather than closure. Land agencies are required to manage the land through proactive management and education and not hardwire closure as the correct first response to mitigate impact.

This plan should ultimately identify reasonable standards for allowing dispersed camping as well as added campgrounds. Keeping open roads will allow use for dispersed camping and help mitigate impact as campers won[rsquo]t be concentrated into small areas. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. BRC supports all recreational activities if done responsibly.

NEPA

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. In the case of the Railroad Saddle Project, we hope USFS will consider the feedback of BRC and our members to come up with a range of management alternatives to meet the purpose and need since the original proposal suffers from several deficiencies. USFS often creates a [ldquo]conservation[rdquo] alternative, then it is typical to present several other alternatives that include varying levels of closures and restrictions from the baseline. That USFS has conditioned itself to believe that it must never expand or enhance recreation access through the planning processes is an inherent and fundamental flaw of this process and a violation of NEPA. This inequitable privilege of one stakeholder[rsquo]s interest over the interests of other stakeholders taints the integrity of the NEPA process. USFS should form a range of alternatives where each of the alternatives accomplishes the goal of the project. The purpose and need of this plan is to create better management strategies, not to simply close and restrict use. Closure is not management. These areas provide a purpose and need for outdoor access that improves physical and mental health for public land users.

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.Closing roads 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 and education. USFS needs to provide as many areas as possible to these user groups.

According to the Bureau of Economic Analysis, outdoor recreation had a record breaking year in 2021. Outdoor recreation now accounts for $821 billion in economic activity. For reference, the oil and gas industry is $812 billion. Outdoor recreation is popular. It is an economic juggernaut. Yet, public land agencies act as if this nearly

$1 trillion dollar industry is optional or an afterthought. Instead of building new roads, trails, campgrounds, and infrastructure to accommodate the new growth in outdoor recreation, land managers are relentlessly closing public lands for the public to use. A deeper dive into the numbers reveals that the engine driving this record-breaking growth is literally the millions of engines that find their way into the various forms of motorized recreation. Non-motorized forms of recreation account for $33 billion in economic value. Gear that is used in all forms of recreation accounts for $52 billion. Motorized forms of recreation account for a shocking $78 billion in economic value.

Not only will the proposed vegetation projects benefit the economy by providing a conducive environment for outdoor recreation but will also bring in local revenue through timber sales. However, USFS needs to fully analyze the negative impacts and economic effects that will occur with the proposed road closures and decommissioning. Ultimately route decommissioning should only be analyzed through travel management and not through vegetation treatment projects. BRC supports the efforts to designate the 10 miles of singletrack and supports any comments made by locals and members who approve these projects for local economic benefit.

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.

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. On his first day in office, President Joe Biden issued an [ldquo]Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.[rdquo] This executive order established [ldquo]an ambitious whole-of-government equity agenda[rdquo] which focuses on addressing [ldquo]entrenched disparities in our laws and public policies,[rdquo] and mandates a [ldquo]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.[rdquo]

Under this executive order, [ldquo]The term [lsquo]equity[rsquo] 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 [rdquo] 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 [ldquo]minimizing[rdquo] the environmental impacts of motorized recreation has 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 [ldquo]human powered[rdquo] and [ldquo]quiet use[rdquo] 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[rsquo]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 [ldquo]environmental justice[rdquo] in NEPA proceedings to consider whether any route closures in the Railroad Saddle project would disproportionately harm disabled users[rsquo] 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 [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. Information can be sent to the following address and email address: