

Data Submitted (UTC 11): 9/5/2024 6:00:00 AM

First name: Simone

Last name: Griffin

Organization: BlueRibbon Coalition

Title:

Comments: Please see attached comment.

Ben Burr, Executive Director September 5, 2024

BlueRibbon Coalition

Nathan Gassman

Canoe Gulch Ranger District

12557 Highway 37

Libby, MT 59923

BlueRibbon Coalition (BRC) is writing to provide feedback for the Norman McCedar 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 Montana or travel across the country to visit Montana and use motorized vehicles to access USFS managed lands throughout Montana. BRC members visit this land for motorized recreation, 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.

Wildfire

BRC supports the broad project objectives to keep forests healthy and reduce the risk of wildland fires. BRC supports treatment on the full 3,171 acres proposed. 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.

Habitat loss is the largest threat to wildlife and 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. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier. The location of the project area, next to Wilderness should not deter treatment. Wilderness does not have buffer zones.

Roads and Trails

BRC commends the USFS in their efforts to have a sustainable and healthy forest for all to use. BRC not only supports the .3 miles of temporary road construction in order to implement this

project and keep users and the forest safe but believes USFS should also permanently adding the 12.7 miles to be opened for completion of the project into the system. The 21 segments to be stored for Grizzly bear management should be opened to the public. There are countless reports and records showing that grizzly bears are not deterred by roads. Roads are not even remotely close to being a large threat to the life of grizzlies. Hunters, poachers and self defense are the greatest cause of death for the species. The 36 miles of haul route reconstruction and maintenance should also be open to the public once the project is completed. These roads provide necessary access into the forest and the benefit far outweighs any minimal impact. The road will already exist. We highly support the 3 miles of new road construction and also believe it should be opened to the public. Many of the proposed roads closed to motorized use are connector routes that are needed for continued use. Oftentimes we see vegetation projects used as a method to close or decommission roads and that is not beneficial for 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. Roads not only provide access to emergency response teams but also allow for continued maintenance access on the forest as well as acts as a natural fire barrier.

The fact that every single road would be gated or have a barrier put in place shows that the forest service did not give any real consideration and proper analysis of opening roads to the public. This is a violation of NEPA. The Forest Service should also have an alternative analyzing the requirements of the Outdoor Americans with Disabilities Act. These additional roads being open to the public can help the USFS be in compliance with these requirements.

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'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 Libby Ranger District 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.

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 2022 outdoor recreation brought in over \$1 trillion. Outdoor recreation has only grown in popularity since then.

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: SEE COMMENT LETTER FOR DETAILS

Sincerely,

Ben Burr

Executive Director

Simone Griffin

Policy Director

BlueRibbon Coalition