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Comments: The attached objection to the Ashley Forest Plan revision Draft Record of Decision and Final Environmental Impact Statement is submitted on behalf of Winter Wildlands Alliance. Please contact me if a hard copy is desired, or if there is any issue with downloading the attached objection letter.

Re: Ashley National Forest Plan Revision #49606 objection

Dear Objection Reviewing Officer,

Objector Winter Wildlands Alliance (WWA) files this objection to the Ashley Forest Plan revision Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS), noticed April 19, 2023. Susan Eickhoff, Ashley National Forest Supervisor, Responsible Official. Our objection relates to the Ashley National Forest's development and application of a winter-specific Recreation Opportunity Spectrum. This is a topic we raised on pages 8-10 of our October 16, 2018 scoping comments.

Objection: The draft plan fails to map a winter Recreation Opportunity Spectrum

We appreciate that the draft plan describes a winter-specific recreation opportunity spectrum (ROS) but we object to the lack of a winter ROS map in the plan or FEIS. It is unclear why the Ashley did not include a winter ROS map similar to Figure 1-3, which depicts the summer ROS settings across the forest.

Without a map, plan components FW-DC-ROS 6, 8, 10, 12, and 14 are essentially meaningless because there's no way for the public or Forest Service staff to know where these desired conditions apply. As stated on page 57 of the draft plan, "The recreation opportunity spectrum for summer and winter is used in each phase of planning to assess, integrate, convey, and monitor the plan area's social, managerial, and physical settings, including seasonal variations and associated benefits." Likewise, page 27 of the FEIS accurately states that "Determinations related to the designation of roads, trails, and areas for motor vehicle use (36 CFR 212(b)) and over-snow vehicle use (36 CFR 212(c)) are site-specific decisions and are not addressed at the forest plan level. Travel management planning occurs outside of the forest plan revision process; however, the forest plan may provide context and guidance for future travel management decisions." However, without a mapped winter ROS, the draft plan not only fails to assess, integrate, convey, and monitor the plan area's social, managerial, and physical settings in winter, it does not meet its potential to provide context and guidance for future winter travel management decisions.

The Recreation Opportunity Spectrum [mdash] winter or summer [mdash] is the heart of any sustainable recreation framework. It describes the desired collage of settings (physical, social and managerial) where specific experiences and benefits are derived. Given the differences in use, access, and setting on the Ashley National Forest during winter versus summer, the final plan must include a winter ROS map to support the winter ROS plan components. This is critical for guiding forest management actions and site-specific decisions in winter, when Forest Service actions, and public expectations, for any given area may be considerably different than they are in summer. It is also a critical foundation for winter travel planning under Subpart C of the Travel Management Rule.

While many aspects of the draft plan and FEIS indicate that the Ashley National Forest understands the role and value of the winter ROS, it is puzzling that there is no explanation for why these settings are not mapped. The FEIS simply states that winter ROS classifications have not been completed and that winter travel is represented on Ashley National Forest winter travel maps.¹ The Ashley National Forest website includes a number of maps and publications, but only the four cross-country ski trail maps relate to winter recreation.

It is critical that the forest plan use the winter ROS to identify the suitability of various forest lands for OSV use. This is markedly different from designating areas (or routes) for such use. The draft plan is correct in stating that travel management designations occur in a subsequent process. However, mapping suitability is an essential foundation for future site-specific decisions. Connecting suitability with the ROS maps indicates that over-snow vehicle use may be appropriate but does not make a specific commitment to authorize the use. However, where lands are identified as not suitable for over-snow vehicle use, then it may not be authorized in subsequent travel planning.

Future designated OSV routes and areas must be located in areas identified as suitable for winter motorized use in the forest plan, but this does not mean that all suitable (semi-primitive motorized, roaded natural, rural) areas or the full extent of these areas should or will be designated for OSV use during travel planning. If the Ashley follows Forest Service directives and produces a forward-looking winter ROS map then the future travel plan could tie to the winter ROS presented in the revised forest plan and rely on the programmatic-level planning done during the forest plan revision to make the OSV planning process go more smoothly.

Already we are seeing the pitfalls of not having winter ROS map to guide OSV planning on the Inyo National Forest in Region 5. The Inyo has moved to initiate winter travel planning following completion of its forest plan revision but, as anticipated, the revised forest plan, which lacks a winter ROS map, fails to provide guidance for this process. As with the Ashley, recreation opportunities and settings are vastly different on the Inyo in winter versus summer, and many areas that are non-motorized in summer on the Inyo provide highly-valued backcountry OSV riding opportunities in the winter. Moreover, there are areas across the Inyo, and Ashley, that are roaded and suitable for motorized access in the summer that provide highly-valued ski or snowshoe opportunities in the winter, or are critical wildlife habitat where winter motorized use is not suitable. Without a winter ROS, the Inyo is forced to choose between ignoring forest plan direction or developing a winter travel plan that will severely limit longstanding backcountry OSV recreation opportunities. Either option poses significant difficulties for public engagement. There is no need for the Ashley to follow the same flawed approach.

1. Ashley National Forest Revised Forest Plan FEIS, Chapter 3, page 299

Conversely, the Shoshone National Forest in Region 2, which is currently conducting travel management planning, has been able to reference its 2015 Forest Plan for guidance. The Shoshone Forest Plan includes a winter ROS map that identifies big game winter range and other sensitive areas as primitive or semi-primitive non-motorized in winter. These areas are not under consideration in the winter travel planning process. Meanwhile, the Forest Service has been able to clearly communicate that areas zoned for winter semi-primitive motorized use are not suitable for highly developed winter recreation infrastructure, while groomed trails and staging areas are suitable within winter roaded natural areas.

Other new forest plans, recently revised under the 2012 Rule, including the Flathead, Custer Gallatin, and Helena-Lewis & Clark, contain winter ROS maps and plan components as well. These plans provide a template for the Ashley to follow in creating a winter ROS map.

It is critical that the forest plan uses the ROS to identify the suitability of various forest lands for winter motorized use. This is markedly different from designating areas (or routes) for motorized use, which will happen subsequently in winter travel planning. Connecting suitability with the ROS maps indicates that motorized use may be appropriate but does not make a specific commitment to authorize the use. Furthermore, where lands are identified as not suitable for motorized use, then it may not be authorized in subsequent travel planning.

Although winter travel planning will make site-specific designations, the revised Ashley Forest Plan must include a winter ROS map that reflects an integrated planning process in which recreation is part and parcel of social, economic, and ecological sustainability. Winter ROS maps should not simply reflect where OSV use currently

occurs on the forest, but rather should be forward looking and provide guidance on how the forest hopes to manage winter recreation in the future.

The forest plan must also include a winter ROS map as part of its framework for sustainable winter recreation. This framework is necessary to satisfy the 2012 planning rule requirement to develop plan components that provide for year-round sustainable recreation and to ensure that OSV use does not threaten sensitive winter wildlife, wildlife habitat, air and water quality, and wilderness values.

Resolution:

* Develop winter ROS map that reflects desired future conditions for winter recreation settings and provide opportunity for public review and comment on the map before incorporating it into the final forest plan.

Thank you very much for your consideration of the above objection. Winter Wildlands Alliance would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections or of any further opportunities to comment or decisions.

Sincerely,

Hilary Eisen Policy Director