



October 16, 2018

Jeff Schramm
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, UT 84078

Dear Supervisor Schramm,

Winter Wildlands Alliance is a national non-profit, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Our alliance includes 40 grassroots groups in 16 states, including Utah, and has a collective membership exceeding 50,000. Our members and supporters visit the Ashley National Forest for non-motorized winter recreation opportunities, such as backcountry skiing and splitboarding in the Uintas, cross-country skiing and snowshoeing at Flaming Gorge National Recreation Area, and overnight trips to the Grizzly Ridge and Limber Flag yurts.

The 2012 Planning Rule aims to balance multiple uses, including recreation, with the restoration and maintenance of forest and water ecosystems. To do so, revised forest plans must include plan components that address sustainable recreation, including recreation settings, opportunities, and access; and scenic character.¹ These plan components should take into account the outdoor recreation economy and opportunities to connect people with nature. Of course, all of these elements are interrelated. As people connect with nature through recreation, they contribute to the outdoor recreation economy, and the protection of natural resources is integral to the sustainability of recreation opportunities. Therefore, protecting the Ashley National Forest's natural resources and environment is an essential element of sustaining the region's outdoor recreation economy.

While the Proposed Action includes many commendable elements, we identify several crucial omissions below, as well as the imperative of more thoroughly integrating elements contained in the plans. As elaborated below, the Forest Service must:

- Support sustainable recreation more thoroughly with required plan components;
- Integrate plan components across planning focus areas, including through better use of the Recreation Opportunity Spectrum (ROS);
- Support ROS settings with required plan components; and
- Support Recreation Management Areas with additional and area-specific plan components to ensure appropriately focused management for these areas

¹ 36 CFR 219.10 (b)(1)(i)



I. Sustainable Recreation and Integration

According to the Bureau of Economic Analysis, outdoor recreation accounted for 2.2 percent (\$427.2 billion) of the GDP in 2017, and this sector of the economy is growing considerably faster than the US economy overall.² In Utah, outdoor recreation contributes more than \$12.3B to the economy, employs more than 110,000 people and is the primary driver behind the tourism industry. It also generates \$737 million in state and local tax revenues and \$3.9 billion in wages and salaries. The Ashley National Forest helps to support this robust outdoor recreation. Recreation is the path through which most people experience national forests, and it is essential that management for, and impacts to, recreation be at the forefront of forest planning. Historically, with the exception of a few focused areas, recreation has been treated as an afterthought – a side benefit of national forest lands after timber, grazing, mineral development, and fire management. However, recreation on our national forests doesn't occur in just a few focused areas. The growth in recreation, particularly dispersed recreation, means that the Forest Service should consider how recreation management is integrated into other management activities across the full extent of the national forest. Fortunately, the 2012 Planning Rule includes a new focus on sustainable recreation, which will help the Forest Service to address and plan for sustainable recreation management in the revised forest plan.

The forest plan should showcase the Ashley National Forest's niche and provide a thoughtful and proactive plan for maintaining, and improving upon, the recreation opportunities the forest provides. While the infrastructure and access settings described by the Recreation Opportunity Spectrum are important, there are other—sometimes more important—aspects that draw recreationists (e.g., snow quality & topography, use-specific trails, etc.). These place and activity considerations should inform the Forest Plan.

Backcountry skiing, Nordic skiing, snowboarding, and snowshoeing are all activities with rapidly growing participation rates. For example, according to the Outdoor Foundation's 2017 participation report³, cross country skiing is among the fastest-growing outdoor activities. These activities draw people to the Ashley National Forest. Growth in outdoor recreation is encouraging because we see more people invested in caring about the places that provide these recreational experiences. At the same time, this growth brings a new urgency and the need to manage for sustainable recreation and balanced backcountry winter recreation. With sustainable recreation management, we can ensure that the Ashley

² Bureau of Economic Analysis, Outdoor Recreation Satellite Account. Available at <https://www.bea.gov/outdoor-recreation>

³ Outdoor Foundation. 2017. Outdoor Recreation Participation Topline Report. Available at https://outdoorindustry.org/wp-content/uploads/2017/05/2017-Topline-Report_FINAL1.pdf



National Forest provides opportunities for recreationists to appreciate and enjoy public lands while at the same time ensuring that this enjoyment does not degrade the natural environment.

The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.⁴ To meet this requirement, the revised forest plan must include sustainable recreation plan components, including standards and guidelines (not just desired conditions) that are integrated with plan components related to other uses. In addition to aligning recreation management actions with the recreation opportunity spectrum, the Forest Service should integrate management actions for other multiple uses – such as timber or grazing – and sustainable recreation. The Forest Service should use the Recreation Opportunity Spectrum (ROS) to integrate sustainable recreation and other elements of forest management. Given that the ROS must reflect desired conditions, not just conditions as they currently exist, it provides guidance for how forest management projects or infrastructure are developed to reach desired conditions.

To integrate plan components, the draft EIS should must explain how management direction across the forest, for each use, fits within the ROS setting for any particular area. Not only is it important to describe the different settings and characteristics for each ROS category and map separate ROS settings for summer versus winter, the Forest Service needs to consider how ROS interplays with the non-recreation focused parts of the plan. To integrate sustainable recreation into the forest plan, we suggest the following desired conditions related to recreation:

Desired Conditions

- (FW-DC-SE) Non-motorized recreation is promoted, allowed, and welcomed across the Forest in places where it is sustainable, through the activities that are sustainable, and to the extent that it is sustainable.
- (FW-DC-ROS) Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
- (FW-DC-ROS) A full range of recreation settings is available, ranging from unroaded and challenging “backcountry” areas to roaded “frontcountry” settings which are easily traveled and convenient for connecting communities to the forest.
- (FW-DC-SE) Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.
- (FW-DC-ROS) Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.

⁴ 36 C.F.R. § 219.10(a)



- (FW-DC-TI) and/or (FW-DC-TV) Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.
- (FW-DC-IN) The transportation system is sustainably constructed and maintained so that it does not result in negative impacts to forest resources.
- (FW-DC-IN) The transportation system is right-sized to fit the Ashley National Forest maintenance budget.

We understand that long-range plans cannot dive too deeply into tactical prescriptions, but the revised plan must still *specifically* describe what steps the Forest Service will take to achieve desired conditions. In addition, the revised forest plan should include geographic-specific direction and not just rely on programmatic direction. Especially for recreation management, where recreation resources are closely tied to site-specific attributes, the revised plan should include plan components that recognize the unique features of different areas within the forest and provide direction for how to manage these resources. In order to be effective, desired conditions must be supported with other required plan components, including specific standards and guidelines. Without a full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path towards achieving the desired conditions. Therefore, we suggest the following additional plan components:

Standards

- (FW-DC-TI) and/or (FW-DC-TV) Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.
- (FW-ST-ROS) Cross-country foot travel, including skiing, is allowed across all ROS settings unless an area is administratively closed to public access.
- (FW-ST-VEI) Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.
- (FW-ST-IN) Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.
- (FW-ST-TI), (FW-ST-TV), and (FW-ST-EM) When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.
- (FW-ST-FAC) Facilities are constructed in accordance with the Recreation Opportunity Spectrum.



Guidelines

- (FW-GL-VEI) Front-country areas provide initial contact points for forest users and developed recreation settings where people can engage in a variety of recreation activities including scenic driving, cross-country skiing, snowshoeing, picnicking, and camping.
- (FW-GL-IN) Main access corridors to Forest Service lands and contact points such as developed trailheads and observation points have information available and provide a transition and orientation place for forest users as they enter back-country areas. Visitor use in these areas is moderate and disperses from these points.
- (FW-GL-VEI) The Forest Service will work with local and national partners to educate users on best practices for reducing conflict and to sign shared use trails with information on trail etiquette to promote responsible behavior.
- (FW-GL-SE) Wherever possible, the Forest Service will prioritize the development of partnerships with non-profit organizations and local government entities whose missions complement the Forest Service's mission and desired objectives.
- (FW-GL-TI), (FW-GL-TV), and (FW-GL-EM) The Forest Service should coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.

II. Recommended Wilderness Areas

Recommended Wilderness is a designation that protects sensitive and unique ecological features and supports many human-powered recreation opportunities. The proposed plan does not appear to include any management direction for recommended wilderness areas – this must be rectified as plan revision moves forward.

The Ashley National Forest must manage Recommended Wilderness Areas to protect wilderness character and the potential for wilderness designation. Recommended Wilderness Areas are not suitable for motorized or mechanized uses and should be mapped as primitive on both the summer and winter ROS maps. We do recognize that Recommended Wilderness is not the proper tool to protect *all* landscapes. The Ashley National Forest should work with recreationists to identify possible conflicts between non-conforming recreation uses and Recommended Wilderness Area designations early in the forest plan revision process so as to avoid creating or escalating conflicts.



III. Backcountry Areas

We encourage the Ashley National Forest to expand the types of management areas in the revised plan to include a new designation: Backcountry Areas. Some National Forests (e.g. Custer Gallatin) are using this Management Area to establish management for roadless lands that have high conservation value and include established recreation uses that make Wilderness recommendation inappropriate. Backcountry Areas should have a primitive or semi-primitive non-motorized ROS setting in both summer and winter, except where motorized use has previously been designated through travel management planning. In such cases, a semi-primitive motorized ROS is appropriate.

Some unroaded backcountry areas contain high-value recreation infrastructure, such as mountain biking trails or bolted climbing areas, that may conflict with a wilderness recommendation. Rather than recommend these areas for Wilderness, these areas should be considered for non-motorized backcountry areas (ROS setting semi-primitive non-motorized).

We suggest the following plan components for Backcountry Areas. These plan components are based off of plan components for Inventoried Roadless Areas proposed by national forests in New Mexico and Montana that are currently revising their forest plans under the 2012 planning rule.

Desired Conditions:

- These areas provide large, relatively undisturbed landscapes with high scenic quality that are important for backcountry recreation where visitors feel as if they are in a natural place devoid of roads where they can explore, observe nature, and challenge themselves. Because these lands are minimally disturbed, they provide clean drinking water and function as biological strongholds for populations of at-risk wildlife and plants. They also serve as buffers against the spread of non-native invasive plant species and serve as reference areas for study and research.
- Backcountry areas are mostly undeveloped places where people engage in a variety of human-powered recreation activities and some motorized recreation, pursuant to the ROS. Visitors rely on their outdoor skills and self-reliance as they engage in recreation activities.
- Backcountry Areas will be managed for primitive, semi-primitive non-motorized, and semi-primitive motorized recreation opportunity settings (ROS). Management activities conducted within Backcountry Areas should be consistent with the scenic integrity objective of High.

Standards:

- A road shall not be constructed or reconstructed, unless the responsible official determines that a road is needed according to the circumstances allowed in the Roadless Area Conservation Rule (66 FR 3244).
- Timber shall not be cut, sold, or removed, unless the responsible official determines that activities meet the circumstances provided in the Roadless Area Conservation Rule (66 FR 3244).



Guidelines:

- When developing a proposed action, consider conducting restorative activities such as road decommissioning and mine reclamation within the project area to move towards desired conditions.

Suitability of Lands:

- Not suitable for commercial timber activities.
- Not suitable for new oil and gas leasing.
- No Surface Occupancy stipulations apply to new oil and gas development.
- Not suitable for road building.

IV. Recreation Management Areas

We are very supportive of the Recreation Management Area concept as a management tool. Designating Recreation Management Areas is a way for the forest plan to address specific areas where many different recreational uses are concentrated. A Recreation Management Area designation is also appropriate for those places that provide premier opportunities for a single activity (such as a popular climbing area or ski resort).

These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable, both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment. To this end, we suggest the following plan components for this Management Area:

Desired Conditions

- Places of special recreational significance are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support. Manage
- Recreation Management Areas to promote and enhance opportunities for outdoor recreation, and sightseeing while protecting the area's unique natural ecosystem and scenic integrity.

Goal

- Recreation Management Areas provide quality year-round recreation opportunities for those seeking a wide range of experiences on the National Forest.

Guidelines

- Fire management within Recreation Management Areas should strive to protect and preserve recreation infrastructure.



- The Forest Service should work with local and national partners to maintain and develop the recreation infrastructure (e.g. campgrounds, trails, river access sites, climbing anchors, and winter trailheads) necessary for the public to access and enjoy Recreation Management Areas.
- While many trails should be suitable for the average user, trails will be designed and maintained to provide a range of desired challenges to various user groups.
- The Forest Service encourages responsible behavior that promotes and/or avoids compromising the safety of trail users.

Standards

- Strive to use natural or natural-appearing materials when constructing trails, steps, bridges, and other recreational infrastructure.
- Trails that traverse or approach sensitive environmental areas shall be sited, designed, and monitored to ensure those trails are not unsustainably impacting biological resources.
- Existing trails should be inventoried and signed to clarify which trails are open and which trails are closed.
- Harden access sites and boat ramps as needed; add education, stewardship and interpretive information.

Suitability of Lands:

- Not suitable for commercial timber activities.
- Not suitable for new oil and gas leasing.
- No Surface Occupancy stipulations apply to new oil and gas development.

Beyond these general plan components that should apply to all Recreation Management Areas, the revised plan should also include plan components that address the unique circumstances, challenges, and opportunities of each Recreation Management Area.

V. Recreation Opportunity Spectrum

The Forest Service is required to use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes.⁵ Certain recreation resources may be valued by users because of unique physical or geographic attributes regardless of the ROS setting. Although there are challenges with the ROS, it is an important tool for forest-scale planning.

The Planning Rule requires that a plan “must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses,”

⁵ FSH 1909.12



including outdoor recreation.⁶ Likewise, the 2012 Planning Rule states that plans “must include plan components, including standards or guidelines, to provide for sustainable recreation,” including “specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.”⁷ The revised plan should describe the different ROS classes as well as the characteristics of different ROS settings and associated plan components to achieve the desired ROS settings. We are glad to see that the Ashley is on the right track in this regard. We strongly support the desired conditions described in FW-DC-ROS. However, we suggest the Forest Service go a step further, and include plan components that describe suitability and other details associated with the ROS. For example, the plan should specify that motorized use is not suitable in primitive or semi-primitive non-motorized ROS settings and it should indicate which settings are appropriate for winter trail grooming. The revised plan should also include an objective, or objectives, stating that the Ashley National Forest will initiate winter travel planning to designate trails and areas for over-snow vehicle use within semi-primitive motorized, roaded natural, and rural ROS settings within 3 years of completion of the forest plan revision.

In developing the ROS maps, the Ashley should consider input from the public detailing place-specific recreation uses. Understanding how the public recreates on the forest is not only essential in developing the ROS, it will help the Ashley use the ROS to integrate recreation more fully into other aspects of forest management.

It is important that the revised forest plan include winter-specific ROS language and we are pleased to see desired conditions for winter ROS settings described in the proposed plan. When snow covers the landscape, recreation opportunities, settings, and access change dramatically across the forest. Some areas become less accessible and take on a more remote feel than in summer. This change results in some areas that are classified as roaded natural or semi-primitive motorized in summer may change to semi-primitive non-motorized in the winter. Other areas which are non-motorized in summer may be suitable for over-snow vehicles. Although the full range of ROS settings are still evident on the forests in winter, the location, distribution, and total acreage of each setting may change significantly.

Given the distinct differences in use, access, and setting on the Ashley National Forest during winter versus summer, the revised plan must include separate ROS classifications for summer and winter. Winter ROS settings also set the stage for winter travel planning, required under the 2015 Over-Snow Vehicle Rule, by helping the Forest Service better define where over-snow vehicle use is and is not suitable. This is an important first step towards winter travel planning.

The revised plan should make clear that ROS settings do not preclude travel planning decisions. It must explain that site-specific travel planning is needed to determine where motorized vehicle use will be allowed (including over-snow) within semi-primitive, roaded natural, and rural areas. Chapter 10§11.2 of

⁶ 36 C.F.R. § 219.10(a)

⁷ FSH 1909.12, ch. 20, § 23.23a(2)(g)



the Travel Management Planning directives state, “The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis.” Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. § 261.14. Given that application of the minimization criteria are not part of the process wherein ROS classifications are assigned, ROS classifications cannot serve a dual purpose as travel management designations.

VI. Conclusion

Winter Wildlands Alliance strongly supports the 2012 Planning Rule and we are heavily invested in its success on the ground. Much is at stake in this revised plan and we want to help ensure that it is robust, sustainable, and able to adapt to whatever changes the next 20 years may bring.

We appreciate the opportunity to provide comments and we look forward to continuing this conversation.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen". The signature is fluid and cursive, with a large initial "H" and "E".

Hilary Eisen
Policy Director