

February 2, 2024



Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

Via webform: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

Re: Notice of Intent to Develop Northwest Forest Plan Amendment #64745

Dear Regional Forester Buchanan:

Outdoor Alliance, Outdoor Alliance Washington, Outdoor Alliance California, The Conservation Alliance, and Outdoor Industry Association welcome the opportunity to comment on the U.S. Forest Service's Notice of Intent to amend the 1994 Northwest Forest Plan (NWFP). We represent the human-powered outdoor recreation community, the outdoor industry, and conservation-minded businesses in the NWFP area and nationally.

We commend the Forest Service (USFS) and the NWFP Federal Advisory Committee for seeking input on how to modernize the NWFP to improve resistance and resilience to fire, support climate adaptation and mitigation, conserve mature and old growth forests, support economic sustainability of communities, and ensure Tribal inclusion. These comments summarize our community's perspectives on the importance of recreation in the NWFP area, how recreation depends on climate-resilient forests, and how the need for change and proposed actions can more robustly integrate outdoor recreation and support the social and economic sustainability of communities.

1. Importance of Recreation in the NWFP Area

Outdoor recreation on National Forest System lands in the NWFP area and across the country supports social and economic sustainability, including healthy economies, jobs, health and well-being, and environmental stewardship.

Nationwide, recreation on National Forest System lands sustains more private sector jobs than any other Forest Service program and provides the single largest economic stimulus for many local communities adjacent to or within National Forest System lands.¹ Outdoor recreation is the most common way in which Americans come to know their national forests.

The 24.5 million acres of the NWFP area provide a diversity of extremely high-quality outdoor recreation opportunities, from accessible frontcountry trail systems to wild rivers and rugged backcountry landscapes. These opportunities play a crucial role in supporting the health and well-being of people across the Northwest and help residents develop a stewardship ethic through their experiences in natural landscapes. They provide a critical and highly valued cultural ecosystem service value that is central to the quality of life for residents and visitors to the region.

Outdoor Alliance maintains the most comprehensive—though necessarily incomplete—data set of human-powered outdoor recreation resources on public lands and waters, and within the planning area, there are more than:

- 873 river access points and 5,922 miles of whitewater paddling opportunities;
- 10,592 miles of hiking trails;
- 3,754 miles of biking trails; and
- 514 climbing sites.²

We ask that the USFS include these recreation data in your planning, including in development of the DEIS.

¹ Statement of Chris French, Deputy Chief, National Forest System, U.S. Department Of Agriculture - Forest Service Before the United States Senate Committee on Energy and Natural Resources. December 2, 2021,

<https://www.energy.senate.gov/services/files/64DF86F0-023B-4171-B926-B744F786A18D>.

² Outdoor Alliance ArcGIS map: <https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=b28618675ad6491888883692b3f6f991>

These recreation amenities support a thriving outdoor recreation economy in the Pacific Northwest. Outdoor recreation accounts for 2.7 percent of state GDP in Washington, 2.5 percent in Oregon, and 2.0 percent in California according to the Bureau of Economic Analysis.³ From 2021 to 2022, outdoor recreation employment grew by 6.2 percent in Washington, 6.9 percent in Oregon, and 10.1 percent in California.⁴ A 2020 Earth Economics report found that outdoor recreation in Washington state supports \$26.5 billion in annual expenditures and 264,000 jobs.⁵ In neighboring Oregon, a 2021 Earth Economics report found that outdoor recreation in Oregon supports \$15.6 billion in spending and 224,000 jobs.⁶ In addition to the direct benefits of the outdoor recreation economy, the area's compelling access to outdoor recreation helps attract employers and high-skill workers across a range of industries who are attracted to the quality-of-life amenities that outdoor recreation provides.

2. Comments on Preliminary Need for Change

Given the importance of outdoor recreation to social and economic sustainability within the plan area, we believe that the Need for Change in the Draft Environmental Impact Statement (DEIS) must more thoroughly incorporate recreation values into the five interrelated topic areas of wildfire resilience, climate adaptation, mature and old growth conservation, Tribal inclusion, and community sustainability. As we discuss in our comments, outdoor recreation in the plan area has been greatly impacted by climate change and other changed conditions across the NWFP area and is therefore a key reason for the need to amend the plan. Outdoor recreation should be integrated throughout the DEIS purpose and need, analysis, and alternatives.

³ U.S. Bureau of Economic Analysis, BEA 23-54, Outdoor Recreation Satellite Account, U.S. and States, 2022, (2023).

⁴ Ibid.

⁵ Mojica, J., Fletcher, A., 2020. Economic Analysis of Outdoor Recreation in Washington State, 2020 Update. Earth Economics. Tacoma, WA.

⁶ Mojica, J., Cousins, K., Madsen, T., 2021. Economic Analysis of Outdoor Recreation in Oregon. Earth Economics. Tacoma, WA.

The 1994 Northwest Forest Plan does not offer management direction related to recreation. New information such as the *Bioregional Assessment of Northwest Forests* and the *Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area* both address the growing importance of recreation to social and economic sustainability within the plan area. Recommendation 10 of the *Bioregional Assessment* is to “Recognize the social and economic benefits to communities and people from sustainable recreation opportunities.” It goes on to state, “The increasing demands and economic significance of recreation activity as well as the impacts of excessive deferred maintenance and a changing climate was not anticipated in 1994.”⁷ The *Bioregional Assessment* provides several recommendations on how to more fully integrate recreation into land management plan direction, which we cover in our comments below.

The NOI appropriately references 36 CFR 219.8(b), social and economic sustainability, as a substantive requirement of the 2012 Planning Rule that will govern the NWFP amendment process. The 2012 Planning Rule addresses recreation as part of social and economic sustainability, and says that plans revised under the rule “must include plan components, including standards or guidelines, to guide the plan area’s contribution to social and economic sustainability, taking into account...(2) Sustainable recreation; including recreation settings, opportunities, and access; and scenic character.”⁸

Specifically, we identify opportunities to integrate and acknowledge recreation into the DEIS need for change in the following topic areas:

- *Fire Resistance and Resilience:* Wildfires impact outdoor recreation in a number of ways, and recreation values should be thoroughly considered in the DEIS’s discussion of wildfire and forest health.
- *Climate Change:* Climate change is impacting and will impact outdoor recreation in profound ways. Climate change impacts on outdoor recreation and adaptation options outlined in recent climate change vulnerability

⁷ Bioregional Assessment of Northwest Forests, pg. 36.

⁸ 2012 Planning Rule, 36 CFR 219.8(b)

assessments should be thoroughly considered in the DEIS's discussion of climate change.

- *Mature and Old Growth Ecosystems:* Mature and old growth ecosystems provide spectacular settings for outdoor recreation, support healthy flow regimes for rivers and streams, support wildlife-dependent recreation activities, and protect clean air and water; the DEIS should reference outdoor recreation in the need to protect these important ecosystems.
- *Tribal Inclusion:* The Northwest Forest Plan was unjustly developed without the input of the Indigenous Tribes who have stewarded the landscape since time immemorial, and it is essential that the amended plan reflects Tribes' priorities for land and water stewardship, including where recreation may interact with Tribal rights.
- *Communities:* While the Preliminary Need for Change primarily discusses timber production impacts to communities, there is significant opportunity to consider how outdoor recreation supports economic development and quality of life, particularly in rural communities in proximity to National Forests. As timber production has declined, many communities have built thriving outdoor recreation economies, while other communities have faced challenges capitalizing upon recreational assets; both scenarios deserve consideration by the plan.

3. Priority Actions for a NWFP Amendment

In response to the Notice of Intent, these comments summarize our community's perspective on how the NWFP should be modernized to meet today's challenges, emphasizing areas where conservation and restoration actions can enhance the outdoor recreation experience, address climate- and wildfire-related impacts to recreation infrastructure, and expand sustainable recreation access.

In addition to the Need for Change, outdoor recreation should be thoroughly incorporated into the DEIS alternatives and draft plan components. As we note above, new information like the *Bioregional Assessment* recommends plan direction related to outdoor recreation, and the 2012 Planning Rule requires revised plans to

include plan components that address social and economic sustainability, including outdoor recreation.

Our high-level recommendations for a NWFP amendment include:

- Improve wildfire resilience and wildfire resilient recreation infrastructure;
- Address the impacts of climate change on outdoor recreation to provide for social and economic sustainability;
- Protect mature and old growth forests for their climate resilience and recreation benefits;
- Prioritize and expand Tribal involvement in the management and restoration of ancestral lands, including the use of Tribal management, co-management, co-stewardship, and other means that benefit forest health and resilience; and
- Improve social and economic sustainability of rural communities through outdoor recreation.

A. Increase Wildfire Resilience and Wildfire Resilient Recreation

Outdoor recreation activities are increasingly affected by severe wildfires. Wildfires impact outdoor recreation in a number of ways, including damage to recreation infrastructure, closures, smoke, damage to scenic values, impacts to local recreation economies, and more.⁹ This is echoed in the Bioregional Assessment of Northwest Forests, which states: “Uncharacteristically severe fires...impact recreation through direct damage or destruction of infrastructure, reduce air, water, and visual quality, and decreased safety.”¹⁰

As is emphasized several times in the Notice of Intent, many ecosystems throughout the NWFP area have been altered or degraded by fire suppression, climate change, and other stressors. A NWFP amendment should address these stressors by advancing ecologically-sound restoration actions that restore the

⁹ Ervin, Jamie. 2023. Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future. Policy Report. Outdoor Alliance, Washington, DC. Pg. 3.

¹⁰ Bioregional Assessment of Northwest Forests, pg. 65.

structure, function, and composition of ecosystems to a more climate-resilient condition while also addressing the resilience of recreation infrastructure and the recreation experience. The *Bioregional Assessment* recognizes this connection when it states: “Land management plans need proactive direction to address the potential effects of climate change and other landscape-altering events on recreation and its infrastructure.”¹¹

Wildfire Resilience. In 2023, Outdoor Alliance released a policy report about wildfire in western U.S. forests that describes wildfire’s impact on recreation and identifies key strategies for building wildfire resilience in the West.¹² In the report, we emphasize that a dramatic increase in the pace and scale of ecologically sound fuel treatments is needed to return western U.S. forests (particularly dry forests) to a state of fire resilience. An increase in the use of cultural fire, prescribed fire, and wildfire managed for resource objectives is especially needed because these restoration strategies are effective for treating the surface and ladder fuels that have the greatest influence on fire behavior and because these strategies can be used in steeper, more remote areas where mechanical treatments are not an option. We also support science-based mechanical thinning treatments where needed to facilitate the safe reintroduction of fire and where needed to protect life and property. In the context of the NWFP amendment, these thinning treatments should be designed to retain mature and old growth trees, including snags, which provide benefits for fire resilience, scenic values, and biodiversity.

Some examples of how a NWFP amendment can support wildfire resilience include:

- Objectives and monitoring plan components for increasing the use of cultural fire, prescribed fire, and wildfire managed for resource objectives on USFS lands;
- Standards and guidelines for land managers to retain larger trees and snags, especially in old growth and mature forests;

¹¹ Ibid.

¹² Ervin, Jamie. 2023. *Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future*. Policy Report. Outdoor Alliance, Washington, DC.

- Objectives and monitoring plan components for workforce development for fire managers; and
- Provide clear authority for fire managers to manage naturally-ignited wildfires for resource objectives in appropriate ecological settings, and incorporate strategic wildfire response planning such as potential operational delineations (PODs) to help inform fire management decisions.

Wildfire Resilient Recreation. There is considerable opportunity to more thoroughly incorporate outdoor recreation into the design, implementation, and monitoring phases of forest restoration projects. Anecdotally, forest health projects in the NWFP area (and nationally) are not consistently designed with input from USFS recreation staff and stakeholders within the recreation community. Protecting recreation infrastructure, taking into consideration recreation concerns, and attempting to minimize unfavorable impacts to recreation users are integral to make restoration projects more broadly supported by the public.

There are also numerous opportunities to restore recreation infrastructure as part of post-fire restoration and rehabilitation projects. Despite their importance for outdoor recreation and local economies, trails and other recreation infrastructure are not always addressed through Burned Area Rehabilitation, and the USFS relies heavily on partner organizations to return these resources to a safe, usable condition.

Several recent reports, strategies, and work plans outline key actions to explicitly incorporate recreation into wildfire planning, including Outdoor Alliance's policy report, the California Wildfire & Forest Resilience Task Force's "California's Joint Strategy for Sustainable Outdoor Recreation & Wildfire Resilience," and the Eastern Sierra Climate & Communities Resilience Project Recreation Prioritization Work Plan (2021-2025).

Based on our analysis of these plans, we request that the following recommendations be analyzed in the draft EIS and considered for potential plan components, including goals and guidelines:

- Increase the resilience of trail systems and other recreation infrastructure to high severity wildfire. Design new recreation infrastructure to be fire resistant and resilient.
- Integrate recreation resources and infrastructure into project prioritization for fuels projects and landscape-level fire planning. Fire and fuels managers should consider where fuel treatments might prevent loss of forests to high severity wildfire in high value recreation areas.
- Consider recreation assets and infrastructure in the design of forest health and fuels reduction projects. Whenever possible, avoid negative impacts to recreation infrastructure. Rehabilitate and maintain trails and other recreation infrastructure during project implementation.
- Implement multi-benefit projects in or adjacent to the Wildland Urban Interface that have joint wildfire risk reduction and outdoor recreation benefits. Where appropriate, conduct thinning, prescribed burns, and vegetation clearing around outdoor recreation infrastructure to make it more resilient to wildfire and to create defensible space for fire suppression.
- Consider the value of recreation infrastructure when designing permanent fuel breaks so that the Forest Service can reduce wildland fire risks to outdoor recreation assets and their associated community benefits while still maintaining the scenery management objectives of a given area.
- Require coordination and consultation with Forest and District recreation staff while designing and planning forest health and fuels reduction projects.
- Require rehabilitation of recreation infrastructure during post-fire management. Within burned areas, prioritize forest health, hazard tree removal at developed recreation sites, slope stabilization around trails, and restoration of outdoor recreation facilities lost in wildfires.
- Require that, to the greatest extent possible, warnings and other risk mitigation methods other than closures are used for areas and sites affected by wildfire. Risk analysis should assess a broad range of factors including level of use, risks of closing and area, public safety, and degree and likelihood of potential harm. When mitigation by other means does not reduce risk to

acceptable level, targeted closures may be considered and should be limited to the smallest temporal and spatial extent possible.¹³

- Identify the minimum USFS road systems needed to manage landscapes for resiliency and support wildfire suppression. Maintain roads to provide public access and meet management objectives.

B. Enhance Climate-Resilient Recreation

According to the Fifth National Climate Assessment, climate change will impact outdoor recreation in a variety of ways: loss of snowpack will harm snow-based recreation, increasing temperatures may extend recreational seasons, increased flooding and erosion will impact infrastructure, wildfires will close recreation areas and deter outdoor activities, and these changes will produce inequitable outcomes for health and well-being.¹⁴ The *Bioregional Assessment* cites similar climate impacts.¹⁵ The Pacific Northwest Research Station's "Climate Change Vulnerability and Adaptation in the North Cascades Region, Washington" details the climate vulnerabilities of access in the North Cascades, including lack of infrastructure resilience to climate-related events, increased frequency of infrastructure failure in the future, increased likelihood of operational disruptions from climate-related events, and funding constraints to taking preemptive actions.¹⁶

The *Bioregional Assessment* explicitly addresses the need for updated landscape-level land management plan direction related to climate change impacts on outdoor recreation: "Land management plans need proactive direction to address the potential effects of climate change and other landscape-altering events on recreation and its infrastructure." It goes on to say "Land management plan

¹³ See US Forest Service Pacific Northwest Region, Leaders' Intent on Re-Opening Pacific Northwest Forests, memo to Regional Leadership Team (May 3, 2022) for a more complete discussion of the use of an expanded risk analysis and mitigations. Appendix 1 to the Leaders Intent details potential mitigation options and risk factors.

¹⁴ Fifth National Climate Assessment, Ch. 27. Northwest. <https://nca2023.globalchange.gov/chapter/27/>

¹⁵ *Bioregional Assessment of Northwest Forests*, pg. 65.

¹⁶ USDA U.S. Forest Service Pacific Northwest Research Station, "Climate Change Vulnerability and Adaptation in the North Cascades Region, Washington," pg. 65. https://www.fs.usda.gov/pnw/pubs/pnw_gtr892.pdf.

direction needs to address the connection between resilient landscapes and sustainable recreation and prioritize when and how management activities apply to desired conditions related to recreation.”¹⁷

The Notice of Intent speaks to the need to strengthen the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change. In the DEIS, the USFS should consider how climate resilience strategies, ecological restoration, and other actions pursued through a NWFP amendment can address climate impacts to outdoor recreation. This can be achieved in multiple ways, including by integrating recreation into climate resilience strategies, and by addressing the resilience of recreation infrastructure to climate change and other stressors. We request that the following recommendations be analyzed in the draft EIS and considered for potential plan components:

- Conduct an assessment of climate impacts to roads, trails, river accesses, and other recreation resources in need of rehabilitation following climate-related disturbances like floods and wildfires. This assessment can include management goals aimed at making infrastructure investments that are more sustainable and durable.
- Expeditiously restore recreation sites and reopen them to the public after climate-related events. In cases where a site can not immediately be restored, provide interim accommodations for public use and enjoyment.
- Consider how existing policies might be updated to improve the construction and siting of new recreation infrastructure in light of predicted climate impacts.
- Target climate resilience strategies, including aquatic restoration, hazardous fuels treatments, and carbon forestry, in areas that contain high recreational values. These activities should be designed, sited, and prioritized in a way that benefits the quality of the recreation experience in a particular area.

C. Protect Mature and Old Growth Forests

¹⁷ Bioregional Assessment of Northwest Forests, pg. 65.

Mature and old growth forests support a wide range of critical ecosystem services and also provide spectacular settings for outdoor recreation activities throughout the NWFP area. Recreationists greatly appreciate recreating in and around older forests, and older forests are commonly cited as an important recreational value in guidebooks for climbing, mountain biking, paddling, hiking, skiing, and other recreational pursuits. Visiting these forests allows recreationists to gain a deeper understanding of the natural history of our public lands, which in turn helps members of our community develop a lasting stewardship ethic that can support forest conservation over time. Protecting these experiences for present and future generations is a high priority for the outdoor recreation community.

The connection between older forests, outdoor recreation, and the outdoor economy is articulated well in Section 1 of Executive Order 14072 on “Strengthening the Nation's Forests, Communities, and Local Economies,” which states:

“We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature. Many local economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector.”

As the Notice of Intent mentions, high severity fire, insect and disease outbreaks, and other stressors are reducing the gains achieved by the NWFP's protections of mature and old forests. The Plan did not specifically account for these threats, which will only increase over time. It also did not adequately address distinctions between dry and moist forests, nor specifically account for the important role of old growth ecosystems in sequestering and storing carbon.

Specific changes to the NWFP to help protect and restore mature and old forest conditions and recruit new mature and old forests include:

- In wet forests, protect all old-growth forest stands to achieve ecosystem integrity and other management objectives including carbon sequestration and species conservation. Consider ecosystem-appropriate proactive

stewardship activities where needed to increase climate resilience and improve ecological integrity of old-growth stands.

- In dry forests, protect older tree populations through ecologically appropriate active management including thinning and reintroduction of fire. Consider changes to the current Late Successional Reserve network to be more dynamic.
- Identify mature forests that may, over time, contribute to the amount, representativeness, redundancy, and connectivity of old-growth forest conditions at the landscape level, and prioritize conservation and proactive stewardship activities in these areas.
- Develop dynamic conservation strategies to address climate driven shifts in forest conditions and ecological processes.

As the USFS considers this amendment to the NWFP, the agency is simultaneously seeking public comment on a national forest planning amendment to maintain and expand old-growth forest conditions, where appropriate, nationwide.¹⁸ Our organizations strongly support the proposed national amendment, which provides strong science-based guidance for old-growth conservation that is directly applicable to the NWFP amendment. We understand that the NWFP amendment may serve as a regional *Adaptive Strategy for Old-Growth Forest Conservation*, as envisioned by the national amendment. If this is the case, it is particularly important for the NWFP amendment to describe clear indicators for the location and extent of old-growth forests in order to “indicate conditions where plan components apply.”¹⁹ Considering the time frame under which this amendment is being developed, the NWFP landscape may be the first region in the country where the national amendment takes effect. The DEIS should help set the NWFP area up for success in this regard by including and evaluating a range of clear indicators to inform a spatially-explicit map of where the national amendment does and doesn't apply.

D. Support Tribal Management, Co-Stewardship, and Co-Management

¹⁸ See, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 88 F.R. 88042 (Dec. 20, 2023).

¹⁹ Ibid. at 88047.

Since time immemorial, Tribes and Indigenous peoples have stewarded and actively managed the ecosystems within the NWFP area. Tribes within the NWFP area have sovereign rights, treaty rights, and cultural rights to these lands and waters. These resources also support sacred sites, First Foods, and Indigenous cultural identity and sense of place. However, the development and implementation of the NWFP lacked meaningful engagement with Tribal governments and communities, and the inclusion of Traditional Ecological Knowledge (TEK). As a result of this injustice, forest management in the NWFP area (and across the country) fails to adequately recognize and support Tribal sovereignty, co-stewardship, and management.

The NWFP amendment provides an opportunity to enact strong co-stewardship and co-management policies and frameworks. The amendment must increase agency commitment to Tribal rights including treaty rights, early and meaningful engagement with Tribal governments, and co-development of agency actions and projects. Furthermore, the NWFP amendment process must include meaningful, robust, and frequent Tribal consultation and collaboration. In regards to recreation specifically, we recognize the need to sustainably manage recreation to minimize impacts on Tribal rights and interests, including treaty rights. This underscores the need for sustainable recreation plan components, which we discuss below. The outdoor recreation community is committed to improve our own engagement with Indigenous communities, educate recreationists about Tribal rights and responsible recreation, and advocate for resources to better protect natural and cultural resources.

Our organizations strongly support the inclusion of traditional ecological knowledge (TEK) in the NWFP amendment and the ongoing participation of Tribes and Tribal members in the practice of TEK. We encourage the USFS to include components of TEK including through restoration strategies. Examples include advancing Indigenous restoration practices like cultural fire, promoting culturally-significant species, facilitating Tribal management and co-management of National Forest System Lands, supporting Tribal conservation priorities, and supporting work performed by Tribal restoration crews.

E. Improve Social and Economic Sustainability of Rural Communities through Outdoor Recreation

Some communities within the NWFP area experienced major economic impacts as a result of the reduction in timber extraction revenue since 1994. The Forest Service has consistently offered volumes of timber below the probable sale quantity identified in the NWFP. This trend had costs to rural communities, and the economic impacts were not uniform. Certain communities' economic activity contracted more than others in the decade following the NWFP. More recently, the economic activity and tax base of rural communities near national forests have diverged based in part on those communities' proximity to specific amenities. The *Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area* states:

Many communities that are fairly accessible and situated near desired natural amenities, such as mountains, water bodies, and other landscape features associated especially with outdoor recreation and lifestyles, have experienced population growth owing to in-migration by people who are seeking an improved quality of life or are fleeing cities, telecommuting, becoming creative entrepreneurs, or living off of retirement or investment incomes. Such "amenity migration" is a factor driving local community development in some locations.²⁰

These natural amenities support a myriad of outdoor recreation experiences, which consequently support jobs and economic activity in communities proximate to national forests. According to the *Bioregional Assessment*, recreation on federal lands in the NWFP area supported 7,800 jobs and recreation visitors spent about \$613 million annually in the communities within about 50 miles of those national forests.²¹

²⁰ Spies, T.A.; Stine, P.A.; Gravenmier, R.; Long, J.W.; Reilly, M.J., tech. coords. 2018. Synthesis of science to inform land management within the Northwest Forest Plan area. Gen. Tech. Rep. PNW-GTR-966. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 1020 p. 3 vol. Pg 113.

²¹ Biological Assessment of Northwest Forests, pg. 12.

Outdoor recreation can be a driver of economic growth and personal well being, but as with other community benefits from federal forest management (ecosystem function, forest and watershed restoration, protecting treaty resources, and other non-timber forest products) outdoor recreation must be a priority for federal land managers in order for the benefits to be fully realized. The amendment process must support outdoor recreation to support communities within the NWFP area.

The 1994 Northwest Forest Plan does not offer uniform management direction related to recreation. As the *Bioregional Assessment* states,

“In contrast to the NWFP’s guidance for natural resource management, there is no overall consistency to recreation management. The lack of uniform management direction related to recreation inhibits our ability to effectively and efficiently address management concerns for resources that cross multiple administrative boundaries...The increasing demands and economic significance of recreation activity as well as the impacts of excessive deferred maintenance and a changing climate was not anticipated in 1994.”²²

The NWFP amendment should provide for landscape level, consistent management direction for sustainable recreation in the NWFP region. The *Bioregional Assessment* agrees with our assessment, stating that “There is a need for land management plan direction that sustains recreation opportunities considering increasing use and the need to maintain existing developed recreation sites.”²³ It also recognized the importance of consistent, landscape-scale sustainable recreation management: “Recreation management direction needs overall cohesion and consistency within and across the 19 national forests and grasslands in the Bio A area to effectively and efficiently sustain recreation opportunities.”²⁴

We request that the draft EIS analyze the recreation values to communities within the entirety of the NWFP area, and to include this recreation analysis in the EIS analysis of community and economic impacts. This should include a consideration

²² Biological Assessment of Northwest Forests, pg. 36.

²³ Ibid, pg. 65

²⁴ Ibid.

of the value that intact public forests provide as the settings for outdoor recreation opportunities, and how forest management activities, as well as high-severity wildfire and other stressors to forest ecosystems, affect these settings.

We request that the USFS consider the following sustainable recreation plan components, many of which are from recent forest plans revised under the 2012 planning rule. These plan components can apply throughout the NWFP landscape and have already been vetted by agency staff. This list is not comprehensive.

- The diverse landscapes {of the NWFP area} offer a broad range of seasonal and year-round nature-based recreation opportunities. (Sierra Sequoia, REC-FW-DC 01)
- Recreation areas are inviting and inclusive of a culturally diverse population, engaging to youth, welcoming to under-served public, and responsive to shifting demographics. (Nantahala Pisgah REC-DC-13)
- Recreation opportunities provide a high level of visitor satisfaction, while minimizing user conflicts. The range of recreation opportunities contribute to social and economic sustainability of local communities. (Sierra Sequoia, REC-FW-DC 03)
- Coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts. (Sierra Sequoia, REC-FW-GOAL 01)
- Work with partners and volunteers to provide, maintain and enhance recreation opportunities and the surrounding landscape, collect, and manage data on recreation use and demand, and contribute to socioeconomic benefits associated with recreation and tourism. (Sierra Sequoia, VIPS-FW-GOAL 04)
- Use integrated resource planning when designing projects to address impacts to culturally sensitive areas and at-risk species habitat, and to manage recreation opportunities. (Sierra Sequoia, REC-FW-GDL 03)

Plan components can also emphasize application of the Interagency Visitor Use Management Framework. The ecological integrity of the landscape depends on effective application of the Visitor Use Management framework that clearly defines

conditions to be achieved or maintained, identifies management strategies to achieve or maintain desired conditions, and implements management strategies and actions. Through this approach, ecological integrity and quality of the user experience can be improved and maintained.

4. Conclusion

Thank you for your work to modernize the NWFP in light of current challenges, and thank you for considering our input. The outdoor recreation community, outdoor industry, and conservation-minded businesses are committed to working with the Forest Service to more sustainably manage our public lands and the recreation experiences that they provide.

Best regards,



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The Mountaineers



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Chris French, Deputy Chief, National Forest System, U.S. Forest Service
Meryl Harrell, Deputy Under Secretary for Natural Resources and Environment, U.S. Department of Agriculture
Sean Babington, Senior Advisor, U.S. Department of Agriculture
Gordie Blum, Director: Recreation, Heritage and Volunteer Services, U.S. Forest Service

Our Organizations

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The Conservation Alliance is an organization of like-minded businesses whose collective contributions support grassroots environmental organizations and their efforts to protect wild places where outdoor enthusiasts recreate. Alliance funds have played a key role in protecting rivers, trails, wildlands and climbing areas. Membership in the Alliance is open to all companies who care about protecting our most threatened wild places for habitat and outdoor recreation. Since its inception in 1989, The Conservation Alliance has contributed more than \$21 million, helped to protect more than 51 million acres of wildlands; protect 3,107 miles of rivers; stop or remove 34 dams; designate five marine reserves; and purchase 14 climbing areas. For complete information on The Conservation Alliance, see www.conservationalliance.com.

Based in Boulder, Colorado, with offices in Washington, D.C., **Outdoor Industry Association (OIA)** is a catalyst for meaningful change. A member-based collective, OIA is a passionate group of business leaders, climate experts, policy makers, and outdoor enthusiasts committed to sustainable economic growth and climate positivity while protecting—and growing access to—the benefits of the outdoors for everyone. For more than 30 years, OIA has catalyzed a thriving outdoor industry by supporting the success of every member company across four critically aligned areas: market research, sustainability, government affairs, and inclusive participation. OIA delivers success for its members through education, events, and business services in the form of solutions and strategies, consultation,

collaboration, and opportunities for collective action. For more information, visit outdoorindustry.org.

Outdoor Alliance Washington is a network of member-based organizations representing the human powered outdoor recreation community in Washington and the thousands of Washingtonians who climb, paddle, mountain bike, hike, and enjoy coastal recreation on our state's public lands and waters. Our members include Access Fund, the American Alpine Club, American Whitewater, Evergreen Mountain Bike Alliance, The Mountaineers, Surfrider Foundation, and Washington Trails Association.

Outdoor Alliance California and its member organizations—Access Fund, American Whitewater, California Mountain Biking Coalition (CAMTB), International Mountain Bicycling Association (IMBA), Surfrider Foundation, and Winter Wildlands Alliance—represent tens of thousands of human-powered recreationists across the state of California: climbers, paddlers, surfers, mountain bikers and skiers working together to achieve robust land protections, equitable access to public lands and waters, nature-based climate solutions, shared stewardship, and sustainable recreation management on public lands and waters.