



March 7, 2025

Regional Forester Jacque Buchanan  
Pacific Northwest Region  
333 SW 1st Avenue PO Box 3623  
Portland, OR, 97208-3623

Re: Northwest Forest Plan Amendment DEIS comments

To Regional Forester Buchanan:

Thank you for the opportunity to comment on the proposed amendment to the Northwest Forest Plan (NWFP). Winter Wildlands Alliance (WWA) is a national nonprofit advocacy organization representing the interests of human-powered winter recreationists across the U.S. We work to inspire and empower people to protect America's wild snowscapes. Our alliance includes 32 grassroots groups in 16 states, including several across the Northwest Forest Plan area, and has a collective membership exceeding 130,000. The National Forests of the Pacific Northwest provide a multitude of winter recreation opportunities, including world-class backcountry skiing and cross-country skiing, and are highly valued by our constituents. While we recognize that this NWFP amendment is not focused on recreation per se, the NWFP does present opportunities to improve winter recreation opportunities and management concurrent with forest health and timber priorities. In particular, minor additions to the Forest Stewardship and Sustainability of Regional Communities sections of the NWFP would greatly help integrate winter recreation improvements into forest management.

In considering how to integrate winter recreation improvements into forest management, we encourage you to consider how this has been approached in the Northeast. National Forests in Region 9 have begun to incorporate measures to improve winter recreation opportunities into forest health stewardship projects. For example, the White Mountain National Forest worked with Granite Backcountry Alliance (a Winter Wildlands Alliance grassroots group) to incorporate glading—thinning vegetation to create or improve backcountry ski terrain—into multiple forest health projects. The recently-approved Peabody West Integrated Resource Project<sup>1</sup> designates a 300-acre backcountry ski zone alongside 2,200 acres of silviculture treatments on the White Mountain National Forest. Within the ski zone, project activities include removing understory vegetation, primarily three inches and less in diameter, and limbing low-hanging branches on larger trees. These are the same types of activities common to forest health and fuels reduction projects elsewhere. By encouraging forests to work with local outdoor recreation groups to identify opportunities for forest stewardship to support or improve opportunities for access and enjoyment of National Forest lands, the NWFP can better support the sustainability of local communities.

According to the Snowsports Industries America (SIA), 5.2 million residents of the "Pacific region" (Washington, Oregon, California, Alaska, and Hawaii) participated in non-motorized snowsports (including resort skiing) during the 2023-2024 season, with a significant number of people participating in more than one type of activity.<sup>2</sup> Last winter, 948,000 residents of the Pacific Region went cross-country skiing, while 701,000 went snowshoeing. Meanwhile, 815,000 people living in the NWFP area

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<sup>1</sup> USFS project page: <https://www.fs.usda.gov/project/?project=55659&exp=overview>

<sup>2</sup> Snowsports Industries America 2023-2024 Participation Report



(plus central and southern California, Alaska, and Hawaii) went backcountry skiing or splitboarding last season. These numbers do not include the many people who traveled from outside the region for winter recreation vacations last season.

The vast majority of dispersed winter recreation (snowshoeing, cross-country skiing, backcountry ski touring, and splitboard touring) occurs on National Forest lands. And, the majority of forests in Regions 5, 6, and 10 of the Forest Service (the Regions encompassed by SIA's "Pacific region") that support winter recreation are within the NWFP area. The numbers in SIA's latest Participation Report support what any forest manager within the NWFP area already knows – winter recreation is extremely important to many of the people and communities affected by the NWFP.

### **Forest Stewardship**

To encourage forests to consider opportunities for improving dispersed winter recreation alongside forest stewardship activities, we encourage the Forest Service to add an additional factor—"existing or potential dispersed winter recreation opportunities"—to the list of factors and sources of information cited in FORSTW-ALL\_GDL 03 (DEIS Vol 2. A1), as follows:

*"... consider the following factors and sources of information as feasible:*

- **Add** Existing or potential dispersed winter recreation opportunities. Consultation with dispersed winter recreation stakeholders and advocacy groups may help to identify these opportunities."

Likewise, a similar factor should be added to both FORSTW-MTX-MOI-DC 04 **and** FORSTW-ALL-DRY-DC 09 (both found in DEIS Vol 2. A1):

*"...These landscapes support projects that address:"*

- **Add:** Existing or potential dispersed winter recreation opportunities. Consultation with dispersed winter recreation stakeholders and advocacy groups may help to identify these opportunities."

Finally, to encourage forest stewardship treatments that concurrently improve winter recreation opportunities, we suggest adding the following factor to FORSTW-MTX-MOI-GDL 02 (DEIS Vol 2 A1):

*"... Treatments may also contribute to one or more of the following:*

- **Add:** Improving dispersed winter recreation opportunities."

### **Support Economic Opportunities and Sustainable Communities**

We appreciate that the Forest Service is considering ways in which the NWFP can support communities and we are largely supportive of the plan components in this section. However, the NWFP could better address multiple use of Forest Service lands in the NWFP by considering the many varied ways National Forests support economic opportunities and sustainable communities. For example, through outdoor recreation. Demand for recreational opportunities on National Forest lands is large and growing and contributes to a robust outdoor recreation economy across the NWFP area. According to the most recent Bureau of Economic Analysis report<sup>3</sup>, outdoor recreation in the NWFP area supports over 739,000 jobs (121,445 in Washington, 72,925 in Oregon, and 545,448 in California). Snowsports are a significant component of the regional outdoor recreation economy. In Washington, snowsports

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<sup>3</sup> Bureau of Economic Analysis Outdoor Recreation Satellite Account, U.S. and States, November 2024



contributed \$433 million to the state GDP while this sector contributed \$172 million in Oregon and \$692 million in California.

It is unfortunate that several recreation-related plan components recommended by the Federal Advisory Committee<sup>4</sup> were not included in the Proposed Action and we encourage the Forest Service to include these components moving forward. While these do not all necessarily fall under the category of “Support Economic Opportunities and Sustainable Communities”, the NWFP could better support economic opportunities and sustainable communities if it were to consider timber management in concert with other uses of and activities on National Forest lands. Rather than focusing on MMBF sold as the sole metric for economic sustainability, ECONSUST-OBJ (DEIS Vol. 2 A1) **should include** a second objective that considers the multiple uses of National Forest land. We suggest:

- ECONSUST-OBJ 02: Contribute to economic sustainability by implementing at least one integrated resource project per forest per decade to improve or create sustainable recreation opportunities alongside restoration and salvage treatments.

Likewise, the NWFP should encourage forests to consider opportunities to create or improve sustainable recreation opportunities through forest management. To do so, we suggest **adding** the following goal to this section of the plan:

- ECONSUST-GOAL 05: Identify opportunities to prioritize forest management actions that can improve access to sustainable recreation opportunities, particularly dispersed winter recreation opportunities.

The Northwest Forest Plan has long served an important role in managing, and protecting the ecological values of, forests in the Pacific Northwest. We agree with the Forest Service that this Amendment is needed to address changed ecological, social, and physical conditions across the NWFP area. We look forward to continuing to engage in this planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen".

Hilary Eisen  
Policy Director  
Winter Wildlands Alliance

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<sup>4</sup> For example,

- 3-5 DC: Forest health and fuels treatment projects attempt to minimize negative impacts and seek benefits to recreation infrastructure and settings and rehabilitate trails and other recreation infrastructure when impacts are unavoidable.
- 3-6 DC: Forest health and fuels treatment projects contribute to the sustainability of the social and economic values of local communities, including recreation opportunities. Successful projects result in fewer and shorter duration recreational closures due to high intensity wildfires.
- 3-7 STD: Trails and recreation infrastructure impacted by fire or damaged by fire suppression operations shall be repaired to meet agency standards, including restoration of unique recreational values and use of sustainable design principles, consistent with federal law and in consultation with Tribes.