

Data Submitted (UTC 11): 3/13/2025 4:00:00 AM

First name: Tony

Last name: Cannistra

Organization: Cascade Backcountry Alliance

Title:

Comments: To whom it may concern,

Please find a public comment letter submission from Corinne Handleman, President of Cascade Backcountry Alliance, in the enclosed PDF (CascadeBackcountryAlliance_NWFP_DEIS_Comment.pdf).

Thank you!

March 12, 2025

ATTN: Jacque Buchanan

R6 - Pacific Northwest Region All Units 333 SW 1st Avenue PO Box 3623 Portland, OR 97208-3623

Re: Comments on the 2024 Draft Environmental Impact Statement for the Northwest Forest Plan Amendment proposed by the United States Forest Service.

Dear Ms. Buchanan:

Cascade Backcountry Alliance appreciates the opportunity to present comments on the Draft Environmental Impact Statement (the [ldquo]Draft EIS[rdquo]) for the proposed Northwest Forest Plan (NWFP) Amendment.

Cascade Backcountry Alliance (CBA) is a regional education and advocacy non-profit organization that aims to protect and improve access for winter backcountry users in the Pacific Northwest, including snowshoers and backcountry skiers. Backcountry recreation in the winter season is a form of dispersed recreation, the majority of which occurs on land managed by the United States Forest Service under the Northwest Forest Plan. CBA engages with land management agencies both to ensure sustained access to existing opportunities for dispersed recreation (particularly those in winter) and to evaluate opportunities for improving access to these kinds of recreation opportunities to support growing demand.

The growth of participation in snowsports demands action to ensure equitable access to dispersed recreation opportunities. Nationally, participation in snowsports is estimated at 30 million participants, an all-time high, with a more demographically diverse group of participants than ever.¹ Regionally, a state survey of Washington State residents revealed a 12-fold increase in backcountry skiing and snowboarding participation and a 4-fold increase in snowshoeing participation between 2017 and 2022.² This continued growth in winter dispersed recreation is straining the current opportunities that exist for participating, particularly those adjacent to dense population centers, centering the importance of expanding access to opportunities for such activities.

1 2023-2024 Participation Study, Snowsports Industries America (2024)

2 State of Washington 2022 Assessment of Outdoor Recreation Demand Report (2022)

To this end, CBA supports the Proposed Alternative (Alternative B), modified as directed below. The Proposed Alternative represents the best balance of management actions to achieve the objectives set out by the NWFP and, with modification, support winter dispersed recreation within the context of forest management. CBA presents the following comments to the NWFP Amendment Draft EIS Alternative B on behalf of winter dispersed backcountry users.

1. The proposed NWFP Amendment Draft EIS should include criteria specific to dispersed recreation opportunities in the guidelines and desired conditions related to the Forest Stewardship theme.

Access to high-quality winter backcountry recreation is tightly linked to forest structure, particularly stand density and canopy density. Thinner stands create more open areas where clear, unobstructed terrain enhances the safety and accessibility of winter dispersed recreation activities like backcountry skiing and snowshoeing. These stands are safer for winter backcountry recreation due to the reduced incidence of tree wells and other hazards resulting from variable-density snow. Canopy density also affects winter dispersed recreation quality - decreases in canopy density increase peak Snow Water Equivalent (SWE) and snowpack duration, particularly in moist forests.³ This dynamic can lengthen the winter dispersed recreation season, which is particularly important as the climate warms.

The goals of ecological forest management actions are aligned with those of winter backcountry recreation. For example, thinning to restore resilience to fire-suppressed forests can lead to forests preferred by dispersed backcountry recreators⁴ for the above reasons. Therefore, forest management actions that result in lower stand and canopy density performed in service of these ecological aims can have additional benefits to dispersed recreation, particularly in winter.

To support this shared goal, the Draft EIS must be amended to explicitly incorporate dispersed recreation opportunities in the guidelines and desired conditions of the Forest Stewardship theme. We suggest the following

modifications:

1.

1. DEIS Vol 2. A1 FORSTW-ALL-GDL 03: [ldquo]...consider the following factors and sources of information as feasible[hellip]

3 Sun, N., Yan, H., Wigmosta, M. S., Lundquist, J., Dickerson-Lange, S., & Zhou, T. 022). Forest canopy density effects on snowpack across the climate gradients of the western United States mountain ranges. Water Resources Research, 58, e2020WR029194. <https://doi.org/10.1029/2020WR029194>

4 Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area, USFS General Technical Report PNW-GTR-966. Spies et. al. (2018)

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* Add: [ldquo]Dispersed recreation opportunities, particularly those in the winter season such as snowshoeing and skiing, and consultation with regional dispersed recreation stakeholders and advocacy groups.[rdquo]

1. DEIS Vol 2. A1 FORSTW-MTX-MOI-DC 04 and FORSTW-ALL-DRY-DC 09:

[ldquo]...These landscapes support projects that address:[rdquo]

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* Add: [ldquo]dispersed recreation opportunities, including those available in the winter season[rdquo]

1. DEIS Vol 2 FORSTW-MTX-MOI-GDL: [ldquo]...Treatments may also contribute to one or more of the following:[rdquo]

* Add: [ldquo]Developing opportunities for dispersed recreation, particularly for winter season dispersed activities such as skiing and snowshoeing[rdquo]

These revisions broaden the scope of possible forest management actions to include the myriad benefits that reducing forest density can have on winter dispersed recreation opportunities while maintaining the core objectives of the NWFP Amendment.

1. The proposed NWFP Amendment Draft EIS should explicitly consider winter dispersed recreation within the Support Economic Opportunities and Sustainable Communities theme.

The growth of participation in snowsports activities, noted above, drives growth in economic sectors related to winter recreation, bolstering state and local economies. In the NWFP area, outdoor recreation employed over 739,000 state residents across Washington (121,445), Oregon (72,925), and California (545,448)⁵. Snow activities in particular represented state GDP contributions of \$433M (23.4% increase from 2022-23), \$172M (20.7% increase from 2022-23), and \$692M (21.1% increase from 2022-23) in Washington, Oregon, and California, respectively⁵. At the national level, outdoor recreation as a whole contributed nearly as much to the U.S. gross economic output (\$1.2T) as timber (\$66B), farming/grazing (\$555B), and mining (\$719.5B) combined in 2023⁶.

In addition, the 2012 Forest Planning Rule requires Forest Plans to [ldquo]include plan components, including standards or guidelines, to guide the plan area[rsquo]s contribution to social and economic sustainability, taking into account[hellip]sustainable recreation; including recreation settings, opportunities, and access.[rdquo]⁷ Though the Draft EIS does perform some assessment of current information available about recreation and its impact on local communities, it fails to include substantive plan objectives related to providing recreation opportunities, particularly for winter dispersed recreation.

5 Bureau of Economic Analysis Outdoor Recreation Satellite Account, U.S. and States, November 2024

6 Bureau of Economic Analysis, Gross Output by Industry, 2023

7Federal Register 88 no 68. Sec. 219.8(b)(2)

Given the substantial contribution of outdoor recreation, particularly snow sports, to the economies of states within the NWFP Area and the whole national economy, the Draft EIS should be amended to include management objectives that directly encourage opportunities for sustainable recreation, such as:

1. DEIS Vol 2. A1 ECONSUST-GOAL:

* Add: [ldquo]Identify opportunities to prioritize forest management actions that can improve access to sustainable dispersed recreation, particularly those in the winter season.[rdquo]

This revision ensures that improvement in the number of available opportunities for dispersed recreation is a criterion used to derive actions that bring opportunities to sustain NWFP communities.

In summary, Cascade Backcountry Alliance supports Alternative B (the Preferred Alternative) of the NWFP Amendment Draft EIS, modified as described in this comment letter. We strongly encourage the revision of the Draft EIS to better protect and improve access to winter dispersed backcountry recreation in the NWFP area, both for the economic benefits to NWFP communities and the enjoyment of the recreating public.

Sincerely,

ATTACHMENT-LETTER TEXT: CascadeBackcountryAlliance_NWFP_DEIS_Comment.pdf; this is the same content that is coded in text box; it was originally included as an attachment