

July 28, 2017

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Sent via e-mail to cnewman03@fs.fed.us

Re: Colville Forest Plan Revision – Winter Travel Management – Follow-up Letter with Suggested Plan Components

Dear Craig,

This letter is to follow up on the letter we sent you on March 17, and also as a follow up to discussions our partners at The Wilderness Society had with the Region 6 office in June. Based on those discussions, it is our understanding that the Colville National Forest now intends to complete analysis of winter travel in the forest plan revision FEIS but hold off on making any winter motorized designations until it completes subpart C travel planning at a later time. We also understand the Colville will avoid publishing its over-snow vehicle use map (OSVUM) until the Forest Service's Washington Office completes its OSVUM template. Please let us know if our understanding is accurate. We support this approach and believe it is important that the forest plan provide a framework for sustainable winter recreation and subsequent implementation-level winter travel planning.

We recognize the Colville is close to finalizing its forest plan revision, but also note that whether and to what extent the revision addresses winter travel has been somewhat of an evolving target. With that in mind, we are providing the following suggested elements, including sample plan component language, to address winter motorized recreation in the forest plan revision.

I. Add or modify plan components to ensure winter travel management on the Colville complies with applicable laws and regulations.

As outlined in our March 17 letter, the Colville's current approach to winter travel management that allows cross-country winter motorized travel does not comply with the Forest Service's Travel Management Rule, which established a closed unless designated open management regime. In its revised forest plan the Colville should reinforce the Travel Management Rule's provisions through relevant forest plan standards. The plan should provide a programmatic framework for managing motorized use (including OSV use) that includes, at a minimum: (1) suitability determinations for off-road vehicle use that address both legal suitability (e.g., motorized use is prohibited in wilderness) and practical suitability based on terrain, wildlife habitat, and other conditions that impact off-road vehicle travel; (2) winter ROS classifications; and (3) clear statements that any implementation-level area and route designations will be consistent with suitability determinations and ROS classifications, but that all suitable, motorized areas will not necessarily be open to off-road vehicle use. Instead, the forest should designate discrete open areas and trails within those areas that are located to minimize resource impacts and conflicts with other recreational uses.

Suitability Determinations & ROS Classifications

In its revised plan the Forest Service fails to provide suitability determinations for off-road vehicle use that address legal and practical suitability. In fact, the draft revised plan includes suitability determinations that allow cross-country winter motorized recreational use, which directly conflicts with the Travel Management Rule. *See, e.g.*, Revised LMP at 82 (**MA-SU-ARS-01**), 85 (**MA-SU-BCM-01**). *See also* Revised LMP at 163-164, Appendix E (listing “[m]otorized recreational use, winter, trails or cross-country” as a “Suitable Use” category for management areas). We urge the Colville to modify its suitability determinations to exclude any cross-country motorized travel on the forest. As for practical suitability, the Colville should address functional suitability and operability with its determinations. Steep slopes and windswept ridgelines, low elevation areas without adequate snowpack, areas with dense tree cover, and important habitat for wintering wildlife should be found unsuitable for winter motorized use.

Clear Statement Defining Effect of Suitability Determinations & ROS Classifications

Finally, the draft revised plan lacks a clear statement defining the effect of suitability determinations and ROS classifications. The forest-wide guideline for recreational settings states that recreational project-level decisions should be consistent with mapped classes and setting descriptions in ROS, but it does not clarify that those settings *do not require* motorized use where it might otherwise be compatible with settings or ROS classifications.

The final EIS and final plan should make clear that winter ROS settings do not preclude or determine future travel planning decisions. Chapter 10§11.2 of the recently revised 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 set forth in detail in our March 17 letter. 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 over-snow vehicle area designations. Likewise, management area suitability determinations are not a substitute for Subpart C winter travel planning.

We suggest the modifying **FW-GDL-REC-01** to: “Recreation-related project-level decisions and implementation activities should be consistent with mapped classes and setting descriptions in the recreation opportunity spectrum and meet appropriate screening and scenic integrity objectives, but all suitable, motorized areas will not necessarily be open to off-road vehicle use.”

We suggest modifying **FW-DC-AS-01** to be consistent with the Travel Management Rule: “A variety of summer and winter system trails provide a range of difficulty and seclusion levels for the various user types; are located with the objective of minimizing damage to natural resources, harassment of wildlife, significant disruption of wildlife habitat, and user conflicts.”

We also suggest adding the following **Standard** to achieve **FW-DC-AS-01** and ensure compliance with the Travel Management Rule: “Designate discrete open areas and trails within areas determined

suitable for motorized use and with motorized ROS settings with the objective of minimizing damage to forest resources, harassment of wildlife, significant disruption of wildlife habitat, and conflicts with other recreational uses. Show designations on a motor vehicle use map (summer) or over-snow vehicle use map (winter).”

We suggest modifying **FW-GDL-AS-01** to ensure winter motorized use of roads occurs only where those roads have been designated for over-snow vehicle use consistent with the Travel Management Rule: “In the winter, non-motorized over-the-snow recreational is appropriate across the forest. Motorized over-snow vehicle use of roads is allowed only where designated on an over-snow vehicle use map. Roads may be plowed to accommodate management activities such as winter logging or access to winter recreation sites such as Sno-Parks.”

Close Cross-Country Travel

As explained above, the 2005 Travel Management Rule prohibits cross-country motorized travel. The 2015 over-snow vehicle use rule expressly includes over-snow vehicles in that prohibition.

We suggest revising **FW-STD-AS-01** to ensure compliance with the Travel Management Rule: “Cross-country over-snow vehicle use is prohibited except in discrete, specifically designated open areas.”

Minimum Snow Depth

As explained in the March 17 letter, a forest plan standard setting minimum snow depths is necessary to protect soil, vegetation, water quality, and allow management to adapt to changing conditions. The final plan should include a standard that sets a minimum snow depth of 18 inches for OSV travel.

We suggest revising **FW-GDL-AS-03** to be a **Standard** modified to read: “Over-snow vehicle use is allowed when snow depth at over-snow vehicle staging areas meets a minimum depth of 18 inches.”

Seasonal Dates

The over-snow vehicle season should be clearly outlined in the Forest Plan as a winter recreation plan standard. We suggest adding a **Standard** that sets a season for winter motorized recreational use when the snowpack is expected to be of suitable depth, based on average conditions. Setting seasonal bookends for winter motorized use establishes clear direction, making it easier for snowmobilers to comply and allowing the Forest Service to better protect natural resources and wildlife.

Commit to Implementation-Level Winter Travel Management Planning

To ensure compliance with subpart C through subsequent implementation-level winter travel management planning to designate discrete open areas and routes in suitable areas with motorized ROS settings, the final plan should include an **Objective** to initiate a winter travel planning process within 1 year of plan approval and to complete that process within 3 years of plan approval.

II. Include plan components, including standards and guidelines, that ensure the Colville will work towards sustainable winter recreation.

The 2012 Planning Rule states that plans “must include plan components, including standards or guidelines, to provide for sustainable recreation,” including “[s]pecific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.”¹ Sustainable recreation is “the set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations.” *Id.* at § 219.19. In revising a forest plan, the Forest Service must develop plan components—including standards and guidelines—that provide for sustainable recreation, including sustainable settings, opportunities, and access; and scenic character. 36 C.F.R. § 219.10(b)(1)(i). The Forest Service is required to use the ROS to integrate recreation with other resource values to derive sustainable recreation outcomes. The ROS is the best tool the Forest Service has for forest-scale planning related to development of infrastructure and appropriate levels of motorized use and access.

Backcountry skiing, Nordic skiing, and snowshoeing are activities with rapidly growing participation rates. According to the Outdoor Foundation’s 2016 participation report, backcountry skiing is among the fastest-growing outdoor activities, seeing 10% and 8% growth over the past three years, respectively.² Many other types of outdoor recreation are on the rise as well. This 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 to the need to manage for sustainable recreation. With sustainable recreation management the Colville can ensure there are opportunities for the recreating public to appreciate and enjoy public lands while at the same time ensuring that this enjoyment does not degrade the natural environment.

While the forest-wide desired conditions related to the access system and recreation set worthy goals, there is little in the revised plan that *specifically* describes what steps the Forest Service will take to achieve these desired conditions. To be effective, desired conditions must be supported with other required plan components, including specific standards and guidelines to provide for sustainable recreation including recreation settings and access. 36 C.F.R. § 219.10(b)(1)(i). The forest-wide plan components for access system offer limited standards and guidelines. *See* Revised LMP at 62-63. The plan components for recreation lack any standards. *See* Revised LMP at 72-73. Without a full complement of plan components, the plan does not provide a clear path towards achieving the desired conditions. It also does not comply with the 2012 planning rule.

To ensure the desired conditions are achieved and comply with the 2012 planning rule’s requirement for standards and guidelines that provide for sustainable recreation, we urge the Colville to consider adding the following plan components to the forest-wide direction for access systems:

- Add **Desired Condition:** 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.

¹ FSH 1909.12, ch. 20, § 23.23a(2)(g).

² *See* Outdoor Recreation Participation Topline Report (Outdoor Foundation 2016), *available at* <http://www.outdoorfoundation.org/pdf/ResearchParticipation2016Topline.pdf> (last accessed July 18, 2017).

We urge the Colville to consider modifying or adding the following plan components to the forest-wide direction for recreation:

- Modify **FW-DC-REC-01** to include: “The landscape is generally natural appearing and often includes historic or cultural features.”
- Add **Desired Condition:** “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. In particular:
 - 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, rock climbing, hiking, camping, picnicking, fishing, and boating.
 - Back-country areas are mostly undeveloped places where people engage in a variety of more primitive recreation activities. Visitors rely on their outdoor skills and self-reliance as they engage in recreation activities.
 - 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.”
- Add **Desired Condition:** “Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.”
- To implement the desired condition listed above, add the following **Goals and Objectives:**
 - **Goal:** “The Forest Service will work with local and national partners to educate users on best practices for reducing conflict and promoting responsible behavior.”
 - **Objective:** “Within 3 years of plan approval, the Forest Service, in partnership trail user groups, will sign shared use trails with information on trail etiquette.”
 - **Goal:** “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.”
- To implement the desired condition above, add the following **Standard:** “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.”
- Add **Desired Condition:** “Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.”
- To implement the desired condition above, modify **FW-DC-REC-02** to be the following **Standard:** “Design and construction of new projects must be consistent with the assigned Recreation Opportunity Spectrum (ROS) classification for the relevant location.”

The final plan should identify winter-specific ROS and include relevant plan components to achieve the desired settings. The Deschutes National Forest defined appropriate winter recreation ROS subclasses in its 2009 Winter Recreation Suitability Analysis. These subclasses make sense for the Colville as well. These subclasses are as follows:

- Alpine Solitude (ROS primitive and semi-primitive non-motorized)
 1. These areas provide opportunities for challenge and self-reliance in a wilderness setting. These areas provide untracked snow.
 - Standard: Facilities and services are not provided.
- Backcountry (ROS semi-primitive non-motorized and semi-primitive motorized)
 1. These areas provide opportunities for challenge and self-reliance in a backcountry setting. Untracked snow is easy to find.
 - Standard: Trails are marked but not groomed.
- Alpine Challenge (ROS semi-primitive non-motorized and semi-primitive motorized)
 1. These areas provide opportunities for challenge and low to moderate social interaction in an alpine setting.
 - Standard: Marked trails provide good access and a variety of terrain features provide alpine recreation opportunities for visitors.
- Motorized Social (ROS roaded natural and roaded modified)
 1. These areas provide safe and family-friendly opportunities on motorized trails. Well-marked and maintained trails and adequate parking and staging facilities are appropriate and expected. Non-motorized visitors expect to see and hear over-snow vehicles.
- Non-motorized Social (ROS roaded natural and roaded modified)
 1. These areas provide safe and family-friendly opportunities on non-motorized trails.
 2. Standard: Well-marked and maintained trails and adequate parking and staging facilities are appropriate and expected.

Conclusion

Establishing a forest plan with a vision for ensuring sustainable winter recreation is crucial in light of growing demands on the Colville National Forest. We appreciate the Colville’s efforts to create a framework in its forest plan revision that will help guide future winter travel planning, and hope the Forest Service is able to consider these additional comments on its evolving approach.

Sincerely,

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