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Comments: The Washington State Snowmobile Association (WSSA) appreciates the opportunity to comment on the Notice of Intent to amend the Northwest Forest Plan. WSSA works with its partners including the US Forest Service and Washington State Parks to maintain winter access to public lands for its membership, approximately 21,000 state registered snowmobilers, and other winter recreationists using the motorized trail system in Washington State. We look forward to the Northwest Forest Plan amendment as a way to improve and modernize the current Plan in response to better understanding of our environment and growing human population.

WSSA strongly believes that Sustainable Recreation should be included in the Northwest Forest Plan (DEIS) to provide appropriate balance in consideration of recreational use with other goals of the Plan. WSSA is concerned that significant information regarding the value and importance of recreation was collected in the 2015 listening sessions, 2018 Bioregional Assessment, and other federal studies, yet the Northwest Forest Plan Amendment process appears to be taking a different direction and not adequately including recreation in the plan.

WSSA is particularly interested in Amendment provisions affecting the maintenance and repair of road infrastructure critical to winter recreation. The sport of snowmobiling in Washington State is almost entirely dependent upon access to Federal Forests. Snowmobilers and other winter recreationists have a limited number of access points to Federal Forests as compared to summer users. In recent years, the accessibility of winter recreation opportunities in National Forests in Washington State has been adversely affected by the deteriorating condition of Forest Service roads, inadequate parking for the rising winter user base, and frequent higher snow levels. Higher snow levels limit accessibility to quality recreation due to poor road conditions and a shortage of parking at higher elevations.

WSSA believes that greater clarity needs to be reflected in the language in the Northwest Forest Plan and administrative rules to direct the Forest Service to prioritize routine maintenance and emergency repair of existing Forest Service roads. WSSA suggests that wider use of Programmatic Agreements be initiated to facilitate road maintenance and repair. Roads should both be brought to standards that comply with the Aquatic Conservation Strategy, and be available for the public good.

The current requirements on Forest Service staff for analysis related to road repairs are out of balance with the Forest Service workforce size and budget. We have observed situations where road damage such as washouts or bridge damage has led to extended multi year closures affecting thousands of recreationists and causing completely unnecessary economic losses to local communities. WSSA believes that greater clarity in rules and procedures could allow for expedited emergency and permanent repairs without jeopardizing species and habitat protection, and other goals of the Plan.

WSSA believes that modernization of the Northwest Forest Plan can better achieve the majority of the goals of the existing Plan and proposed amendment, but that Sustainable Communities are tied to not just forest products but also "other economic opportunities" with recreation having the greatest economic value and public engagement. Therefore it is important that impacts to recreation be fully considered especially with regard to maintenance and repair of roads, trails, and associated infrastructure. Thank you to the staff and advisors who have undertaken the work to update this plan.