

June 20, 2023

Chief Randy Moore
United States Department of Agriculture
Forest Service

Submitted via regulations.gov

**Re: Advanced Notice of Proposed Rulemaking for National Forest and
Grassland Climate Resilience.**

Dear Chief Moore,

On behalf of the human-powered outdoor recreation community, the outdoor industry, and conservation-minded businesses, thank you for the opportunity to comment on the Advanced Notice of Proposed Rulemaking (ANPRM) for Forest and Grassland Climate Resilience. We commend the Forest Service (USFS) for seeking input on how to modernize agency policies to adapt to climate change and other stressors, and we consider climate resilience to be an appropriate framework for envisioning this change. These comments summarize our community's perspective on the intersections between climate-resilient forests and outdoor recreation and how outdoor recreation in healthy, intact forestlands—including mature and old growth forests—supports social and economic sustainability.

1. Executive Summary

National Forests are among America's most prized public lands for outdoor recreation. Recreationists benefit from a plethora of recreation sites across the National Forest System (NFS), ranging from frontcountry trail networks, to free-flowing rivers, to remote technical mountain terrain in Wilderness and roadless areas. Opportunities to access these irreplaceable public lands provide physical and mental health benefits to the American public and help Americans develop a stewardship ethic through their experiences in natural landscapes. Access to these lands also supports the growing outdoor recreation economy, which contributed \$862 billion in gross economic output to the U.S. economy in 2021, with

pronounced benefits for rural communities such as those in proximity to National Forests.¹

Outdoor recreation and the outdoor economy are profoundly affected by the climate crisis. Climate impacts like high temperatures, extreme flooding, severe wildfires, loss of snowpack, and drought all detrimentally affect the quality of the recreation experience and in many cases prevent recreationists from venturing outside entirely.² Addressing climate change is an urgent priority for the recreation community, and we strongly support natural climate solutions—such as improved management of national forests—that mitigate the effects of climate change and store carbon while simultaneously expanding equitable access to outdoor recreation and preserving biodiversity.³

In response to the ANPRM and related actions on climate resilience at USDA,⁴ these comments summarize our community's perspective on what should be included in a potential climate resilience rulemaking at the USFS, while emphasizing areas where conservation and restoration actions can enhance the outdoor recreation experience, address climate-related impacts to recreation infrastructure, and expand sustainable recreation access. Our high-level recommendations for a rulemaking include:

- Protect mature and old growth forests for their climate resilience and recreation benefits;
- Address the impacts of climate change on outdoor recreation to provide for social and economic sustainability;
- Expand and strengthen recreation-friendly protected areas;

¹ U.S. Bureau of Economic Analysis, BEA 22-55, Outdoor Recreation Satellite Account, U.S. and States, 2021, (2022).

² Matt Koller, Karla Garibay Garcia, Sage Kime, Will Geiken, & Sam Fearer. Hot Trail Summer: The Impact of a Warming Climate on Climbing and Trail Sports. Protect Our Winters (2022).

³ See, Louis Geltman and Jamie Ervin, A Vision for Protecting Nature: How Natural Climate Solutions Can Benefit the Climate and Outdoor Access, Policy Report, Outdoor Alliance, Washington, D.C. (2023).

⁴ See, United States Department of Agriculture, Forest Service. "Biden-Harris Administration Announces New Steps for Climate Resilience." Accessed [July 2023]. Available at: <https://www.fs.usda.gov/news/releases/biden-harris-administration-announces-new-steps-climate-resilience>.

- Increase the pace and scale of ecological restoration, including through prescribed fire, dam removal, and watershed restoration;
- Further incorporate climate resilience into USFS land management planning, including by providing climate-informed guidance to planners and local decision makers; and
- Facilitate responsible development of renewable energy on public lands.

In addition to these recommendations around a potential rulemaking, we have also included additional information to address themes and questions articulated through the ANPRM that may not require new authorities or policy changes. In many cases, existing policies like the 2012 Planning Rule already provide for climate-informed management, and addressing issues related to agency capacity, agency culture, and collaboration may be the actions most needed for building resilience to the climate crisis. The outdoor recreation community remains committed to working with the USFS to address these issues and to supporting our shared vision of sustainable recreation and healthy, climate-resilient public lands.

2. Structure of Comments and Connection to the ANPRM

These comments are structured in order to address a subset of important themes and questions included in the ANPRM while providing our community's perspective on the highest priority strategies and policy changes that we feel are appropriate for a potential USFS climate resilience rulemaking.

The ANPRM includes five overarching questions followed by a list of nineteen sub-questions intended to inform how the USFS updates agency policies and practices to address the climate crisis. We have provided brief answers to the five overarching questions below, while making reference to themes and policy recommendations that are described in more detail in sections three and four of these comments. Because of the interconnected, often cross-jurisdictional nature of USFS land management, many policies and themes address multiple ANPRM questions.

How should the Forest Service adapt current policies and develop new policies and actions to conserve and manage the national forests and grasslands for climate

resilience, so that the Agency can provide for ecological integrity and support social and economic sustainability over time?

In order to better provide for ecological integrity on NFS lands, the USFS can adopt a new policy and science-based restoration guidance for protecting mature and old growth forests (Section 3A), by expanding and strengthening protected areas across the NFS (Section 3C), and by increasing the pace and scale of science-based ecological restoration (Section 3D). The USFS should also recognize the critical contributions that outdoor recreation makes to the social and economic sustainability of the NFS, and should make enhancing climate-resilient recreation, including recreation infrastructure, core to any new climate resilience policy (Section 3B).

How should the Forest Service assess, plan for and prioritize conservation and climate resilience at different organizational levels of planning and management of the National Forest System (e.g., national strategic direction and planning; regional and unit planning, projects and activities)?

The USFS should adopt climate-informed criteria for how projects and land management plans are prioritized at the forest and regional level (Section 4E). The USFS should also consider how its decentralized agency structure and ongoing capacity challenges may present barriers to implementing climate resilience policies and strategies (Section 4B and 4C). To the maximum extent possible, the USFS should provide clear guidance for local land managers such as district rangers to prioritize climate resilience in project and plan level decision making.

What kinds of conservation, management or adaptation practices may be effective at fostering climate resilience on forests and grasslands at different geographic scales?

Climate-driven stressors such as increased wildfire, drought, and flooding, along with anthropogenic stressors like development in the wildland-urban interface, all threaten national forests' ability to support healthy ecosystems and provide for sustainable recreation over time. A dramatic increase in the pace and scale of ecological restoration activities, including dam removal, fire restoration, and watershed restoration, is needed to address these stressors (Section 3D).

How should Forest Service management, partnerships, and investments consider cross-jurisdictional impacts of stressors to forest and grassland resilience at a landscape scale, including activities in the WUI?

Outdoor recreation often does not abide by jurisdictional boundaries, and many recreational resources, such as whitewater rivers, often pass through a mix of land ownerships and management regimes that are outside of the USFS's jurisdiction. The USFS should strengthen partnerships with state and local governments, nonprofits, and Tribes to address cross-jurisdictional recreation management. The USFS should also consider how to better integrate recreation management into other program areas, such as fuels management or energy development (Section 3B).

What are key outcome-based performance measures and indicators that would help the Agency track changing conditions, test assumptions, evaluate effectiveness, and inform continued adaptive management?

Considering the rapidly evolving nature of the climate crisis, adaptive management will be critical for evaluating whether NFS management is or isn't contributing to climate resilience. To the extent possible, we have included suggestions for key performance indicators in each section of our comments below to help inform how the USFS can track success towards building climate resilience.

3. Priority Actions for National Forest Climate Resilience

The following sections outline components of a potential rulemaking to build climate resilience on national forests while enhancing sustainable recreation and helping protect these forests' role as a carbon sink.

A. Protect mature and old growth forests

Mature and old growth forests support a wide range of critical ecosystem services and also provide spectacular settings for outdoor recreation activities throughout the NFS. 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.”

Since the signing of E.O. 14072 in April 2022, the USFS has made significant progress on defining and inventorying old growth and mature forests on both national forests and BLM lands. The mature and old growth forests report,⁵ released in 2023, includes a broad definition of old growth and mature forests that captures a wide spectrum of the forest ecosystems appreciated by recreationists, ranging from towering douglas fir forests of the Pacific Northwest to arid pinyon-juniper forests in the Great Basin. Collectively, the inventory found 32 million acres of old-growth and around 80 million acres of mature forest across the forested lands managed by USFS and BLM. With the initial inventory complete, the USFS has an unprecedented opportunity to move forward with a rulemaking that includes strong protections and, where appropriate, restoration objectives for old growth and mature forests.

Because of logging, development, high severity fire, insect and disease outbreaks, and other stressors, intact old growth forests are relatively rare throughout the NFS. A rulemaking to protect old growth forests should consider where these forests are currently underrepresented compared to historic levels on a landscape

⁵ U.S. Department of Agriculture, Forest Service, FS-1215a, Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management (2023).

or regional scale, and should include policies aimed at protecting existing old growth stands while encouraging mature forests to develop old growth characteristics. Specific policies to help achieve this outcome include:

- Ecosystem-appropriate standards for mature and old growth tree retention;
- Protective designations, akin to the Northwest Forest Plan’s “Late-Successional Reserves,” that protect existing old growth stands;
- Restoration goals for returning beneficial fire to fire-adapted and fire-dependent forests where needed;
- Restoration strategies aimed at accelerating the development of old growth characteristics in mature forests.

Any new policy to protect old growth and mature forests should complement, and to the maximum extent possible, be integrated into existing USFS policies and strategies, including the forest planning process and the 10-year Wildfire Crisis Strategy. Additionally, the USFS should evaluate where existing policies and incentives, such as regional timber volume targets, may be at odds with mature and old growth forest conservation and should consider how these policies might be updated.

B. Enhance Climate-Resilient Recreation

Natural climate solutions, such as forest conservation, can and should be pursued in a way that also improves sustainable and equitable access to the outdoors. Recreation is a core component of “social and economic sustainability,” as articulated by the ANPRM, and in our view, the resilience of outdoor recreation opportunities across the NFS should be addressed explicitly in a rulemaking. 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.

The outdoor recreation community feels the impacts of climate change in a variety of ways, ranging from region-wide closures of national forests due to wildfire danger, to extreme heat waves deterring outdoor recreation during peak season, to record low levels of snowfall in areas that depend on ski tourism as a key component of their economy. The USFS should consider how ecological restoration

and other actions pursued through a climate resilience rulemaking can address these impacts and others on the recreation experience. This should include an assessment of climate impacts to roads, trails, and other recreation resources in need of rehabilitation following climate-related disturbances like floods and wildfires, along with management goals aimed at expeditiously restoring these sites and reopening them to the public. The USFS should also consider how existing policies might be updated to improve the construction and siting of new recreation infrastructure in light of predicted climate impacts. For example, boat ramps should be sited to account for anticipated water levels under a warmer, dryer climate. Similarly, winter recreation infrastructure should be sited in areas where snowpack is predicted to remain relatively abundant.

We also see a need to more thoroughly integrate recreation management with other USFS programs, including those related to climate resilience. Many of the resilience strategies outlined in the ANPRM, including aquatic restoration, hazardous fuels treatments, and carbon forestry, will likely need to be targeted in areas that support high levels of recreational use. These activities should be designed, sited, and prioritized in a way that benefits the quality of the recreation experience in a particular area. The USFS is currently in the process of creating a new national recreation strategy under the title “Reimagine Recreation,” which seeks to modernize the agency’s recreation program in light of historically high visitation and other stressors like climate change. The preliminary materials being used to inform the new strategy identify integrating recreation into other USFS programs as a key priority. We encourage the USFS to consider how elements of Reimagine Recreation can be incorporated into a climate resilience rulemaking.

C. Expand and Strengthen Recreation-Friendly Protected Areas

Protected public lands and waters provide the foundation for the human-powered outdoor recreation experience, while also supporting numerous ecological and climate-related benefits. The outdoor recreation community strongly supports expanding protected areas across the NFS, and we are committed to helping design these protections in a way that preserves recreation access. A climate resilience rulemaking should incorporate and build on the existing system of USFS protected areas while creating new pathways towards protecting lands and waters for both climate mitigation and carbon sequestration.

The USFS already manages an extensive system of administratively-protected areas such as Inventoried Roadless Areas (IRAs). The Roadless Rule provides needed protection for the last remaining unroaded areas in the NFS while also providing outstanding opportunities for backcountry human-powered outdoor recreation. Managing upper watersheds in a roadless condition is a cost-effective and prudent approach to maintaining water supplies and high-quality fresh water in the face of climate change.⁶ Protection of unroaded landscapes is also critical to achieving landscape-scale benefits of enhanced connectivity among protected areas resulting in unfragmented ecological processes across a significant landscape scale.⁷ Preserving the integrity of these ecological processes and associated ecosystem services is critical to fostering climate resilience. For these reasons and others, it is critical that the USFS protect the climate benefits of roadless areas in a climate resilience rulemaking.

Areas protected through the USFS land management planning processes also contribute to climate resilience and to sustainable recreation simultaneously. The outdoor recreation community has been deeply engaged in USFS planning, and we have worked closely with agency representatives and other stakeholders to design protections in a way that protects core conservation values while retaining access for recreational uses like mountain biking, climbing, skiing, and paddling. This includes areas recommended for inclusion in the National Wilderness Preservation System, as well as other designations like backcountry areas or riparian conservation areas that also guide management in a way that supports climate resilience. As an example, areas protected for nonmotorized recreational use through the over snow vehicle planning process provide habitat for certain wildlife species, clean water, and quiet winter recreation. As climate change leads to less reliable snowpack through the NFS, these areas become even more important, both as a refugia for certain species during the winter, and as a way to preserve backcountry winter recreation access for skiing and snowshoeing. A USFS climate resilience rule might contribute to the travel management process in this case by

⁶ Dominick A. DellaSala, James R. Karr and David M. Olson, *Roadless areas and clean water*, 66 (3) Journal of Soil and Water Conservation (2011).

⁷ McKinley J. Talty, Kelly Mott Lacroix, Gregory H. Aplet, R. Travis Belote, *Conservation value of national forest roadless areas*, 2 (11) Conservation Science and Practice (2020).

providing guidance by which planners can consider how particular snowscapes contribute to climate resilience.

We also recommend that a climate resilience rulemaking include new pathways for designating protected areas on the NFS for their carbon sequestration and climate adaptation values. Preserving forests with high carbon sequestration potential, such as those in the coast ranges of the Pacific Northwest, has been identified by researchers as a key strategy for storing carbon and mitigating the effects of climate change.⁸ Because of the urgency of addressing the climate crisis, new tools outside of the existing land management planning processes may be needed for conserving these forests for their carbon sequestration benefits. Similarly, additional land protections may be merited for areas that serve as an ecological buffer for climate impacts. As an example, in dry forest ecosystems, areas with a restored fire regime have shown increased resilience to both wildfire and drought.⁹ Protecting these areas and providing climate-informed management guidance could be helpful for ensuring that they contribute to climate resilience over time.

We also recommend that the USFS more directly integrate climate resilience into their criteria for administrative Wild & Scenic River (WSR) protections. Healthy, free flowing rivers contribute immensely to climate resilience by providing refugia for aquatic species that are sensitive to water temperature and that will bear the brunt of climate impacts. The USFS should recognize and leverage climate resilience, including refugia for aquatic and riparian species, as an outstandingly remarkable value (ORV) when evaluating WSR eligibility through forest planning. The USFS should also address climate resilience by finding a robust suite of rivers eligible for WSR designation during forest planning in order to account for the potential threats to existing ORVs due to climate change. An extensive network of WSRs can provide a buffer for anticipated climate impacts on aquatic species, riparian species, and water-based outdoor recreation.

⁸ Polly C. Buotte et. al., *Carbon sequestration and biodiversity co-benefits of preserving forests in the western United States*, 30 (2) *Ecological Applications* (2020).

⁹ Gabrielle Boisramé et. al., *Managed wildfire effects on forest resilience and water in the Sierra Nevada*, 20 (4) *Ecosystems* (2017).

Finally, the USFS should end the use of “suitability” studies to strip protections for streams found eligible for WSR designation. Under the 2012 Planning Rule, Forests are required to “Identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System,” and provide for “Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system.” Nowhere does the rule direct planners to conduct a “suitability” analysis or allow for rivers to be removed from eligibility through such analysis. While Agency directives suggest Forests can conduct suitability determinations during planning, this advice plainly conflicts with the superseding 2012 Planning Rule. A climate resilience rulemaking should clarify that suitability determinations may not be used to release rivers and streams from WSR eligibility.

D. Increase the Pace and Scale of Ecological Restoration

As is emphasized repeatedly throughout the ANPRM, many ecosystems throughout the NFS have been altered or degraded by fire suppression, climate change, invasive species, insect outbreaks, logging, development, and other stressors. A climate resilience rulemaking should address these stressors by advancing ecologically-sound restoration actions that restore the structure, function, and composition of NFS ecosystems to a more climate-resilient condition while also addressing the resilience of recreation infrastructure and the recreation experience. Multiple USFS policies and initiatives, including the 2012 Planning Rule, the Climate Adaptation Strategy, and the 10-Year Wildfire Crisis Strategy, already support needed restoration actions. A climate resilience rulemaking should tie to these existing USFS initiatives where appropriate and should provide new authorities and clearer direction for land managers where needed.

Our organizations strongly support the inclusion of traditional ecological knowledge (TEK) in the ANPRM, and we encourage the USFS to include components of TEK in a climate resilience rulemaking, including through restoration strategies. Examples include advancing Indigenous restoration practices like cultural fire, facilitating tribal co-management of USFS lands, supporting tribal conservation priorities, and supporting work completed by tribal restoration crews.

The sections below briefly outline restoration activities that hold particular significance for the outdoor recreation community.

Wildfire Resilience. The outdoor recreation community is increasingly affected by severe wildfires, which degrade recreation infrastructure and deter safe outdoor recreation during fire season. Outdoor Alliance recently 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.¹⁰ 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 both 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 behavior¹¹ and because these strategies can be used in steeper, more remote areas where mechanical treatments are not an option.¹² 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 ANPRM, 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 USFS climate rulemaking can support wildfire resilience include:

- Key performance indicators for increasing the use of prescribed fire and wildfire managed for resource objectives on USFS lands;
- Standards and guidance for land managers to retain larger trees and snags, especially in old growth and mature forests;
- Key performance indicators for workforce development for fire managers;

¹⁰ Jamie Ervin, *Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future*, Policy Report, Outdoor Alliance, Washington, D.C. (2023).

¹¹ Scott Stephens et. al., *Fire treatment effects on vegetation structure, fuels, and potential fire severity in western U.S. forests*, 19 (2) *Ecological Applications* (2009).

¹² Malcolm North et. al., *Constraints on Mechanized Treatment Significantly Limit Mechanical Fuels Reduction Extent in the Sierra Nevada*, 113 (1) *Journal of Forestry* (2015).

- Authority for fire managers to manage naturally-ignited wildfires for resource objectives in appropriate ecological settings.¹³

Dam Removal. Removing dams where social or environmental costs exceed benefits provides an opportunity to simultaneously restore free-flowing rivers, improve biologically rich riparian habitats, and improve the outdoor recreation experience. In some cases, dam removal projects can also have significant climate benefits through reductions in methane emissions and by making rivers themselves more resilient to climate change. A USFS rulemaking should include dam removal as a key climate resilience strategy and should establish key performance indicators and incentives to facilitate dam removal where appropriate.

Watershed Restoration. Healthy, functioning watersheds and free-flowing rivers and streams provide outstanding recreation opportunities throughout the NFS and also support climate resilience by providing important habitat for aquatic species and a reliable water supply for communities throughout the country. We recommend addressing watershed health through a climate resilience rulemaking by building on existing guidance in the 2012 Planning Rule and the Watershed Condition Framework. This should include language clarifying the USFS's responsibility to maintain the condition of watersheds that are functioning properly, as well as stronger standards and incentives to encourage land managers to improve the condition of watersheds that are impaired or functioning at risk.

Post-fire Restoration. The post-fire rehabilitation process includes numerous opportunities to increase the climate resilience of USFS lands and restore recreation infrastructure. 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. We recommend that the USFS consider how best to address post-fire impacts to recreation through a climate resilience rulemaking.

E. Address Climate Resilience through Land Management Planning

¹³ Many older USFS land management plans do not explicitly allow for resource objective wildfires outside of wilderness areas.

The outdoor recreation community has been deeply involved in forest planning and travel management planning, including close engagement by many of our organizations and partners in the initial application of the 2012 Planning Rule. Forest planning is a highly important opportunity to balance sustainable recreation with other public lands values in a way that achieves beneficial outcomes for both people and ecosystems. Plan revisions also include valuable opportunities to protect important areas for conservation purposes while continuing to provide for high quality recreation access. Having invested over a decade of work into several of the “early adopter” forests, we support existing efforts to increase the pace and scale of forest planning and to make the plan revision process more efficient through the new USFS Planning Service Organization. Completing forest plan revisions expeditiously will be critical for adapting the NFS to climate change.

Although the 2012 Planning Rule already emphasizes climate resilience, a new rulemaking by the USFS could provide additional clarity for land managers to ensure that forest plans move the NFS towards a more resilient condition. Specifically, we encourage the USFS to update guidance to inform how the agency prioritizes the timing of forest plan revisions in a way that maximizes the benefits for climate resilience. Forest plan revisions are supposed to occur every 15 years, but currently, 99 out of 128 Forest Service land management plans are older than 15 years. As the agency works to address this backlog, it should consider climate resilience as a framework for which plan revisions occur first and which receive limited resources.

F. Facilitate Responsible Development of Renewable Energy

A society-wide transition from fossil-fuel based energy sources towards renewable energy is needed to address the climate crisis. This transition will likely put increased pressure on USFS lands, through individual projects, increased demand for critical minerals, and new transmission infrastructure. All of these development activities potentially affect outdoor recreation and conservation values on USFS lands. Our organizations acknowledge the pressing need to transition away from fossil fuels, and we encourage the USFS to consider how a climate resilience rulemaking might balance the need for new renewable energy infrastructure with

ecosystem integrity as well as outdoor recreation and its associated social and economic values.

4. Other Themes and Questions from the ANPRM

The sections below outline our perspective on selected themes and questions raised in the ANPRM that might be addressed outside of the context of a climate resilience rulemaking.

A. Climate Risk Viewer

Our organizations appreciate the inclusion of the Climate Risk Viewer in the ANPRM, and we generally feel that this tool has potential to lead to better planning and decision making on NFS lands. We are especially encouraged to see the USFS include land allocation mapping from Land Management Plans into a single layer in the viewer so that the multiple land allocations made through the forest plan revision process can be viewed in a single location alongside other data. Given the contribution of outdoor recreation to the social and economic sustainability of the NFS, we strongly encourage the USFS to add recreation data to the Climate Risk Viewer. At a basic level, this should include trails, campgrounds, river access points, and other USFS recreation sites and should also include land designations that facilitate recreational activities, such as non-motorized areas used by backcountry skiers. Including recreation data will help the USFS better integrate recreation management into other areas of work and will help visualize the connections between recreation values and climate-resilient landscapes—a high functioning watershed alongside high-value water-based recreation, for example.

B. Implementing Climate Resilience Policies

Due to the USFS's size and relatively decentralized structure, implementing the priorities laid out in a climate resilience rulemaking will require significant coordination and capacity building within the agency. Having worked closely with the USFS on a wide variety of initiatives, ranging from small trails projects to decade-long forest plan revisions, our organizations have an informed perspective on how national-level policies are—and sometimes are not—implemented effectively. In our experience, many USFS projects originate from a local-level need

identified by stakeholders and are then vetted by agency staff through multiple layers of policies, including forest plan guidance, roadless area protections, and more. This grassroots, bottom-up approach to project planning is helpful for ensuring that NFS management reflects the needs of local communities, but it can also lead to conflict and misunderstanding among stakeholders when national-level policies are unclear or ambiguous. A USFS climate resilience rule should include clear policy direction that can be easily applied at the local level. We also recommend that the agency commit to training local-level staff on climate-informed land management so that they are better able to implement climate resilience priorities once a rule is finalized.

C. Agency Capacity

In 2021, Outdoor Alliance, The Mountaineers, and Winter Wildlands Alliance released a report titled “A Case for Bold Investment in the Forest Service” documenting the ongoing capacity challenges related to recreation management at the USFS.¹⁴ The report details how, despite rising levels of recreational use, the USFS faces staffing and funding challenges that prevent the agency from achieving its mission related to recreation and sustainability. Extreme weather events and other stressors driven by the climate crisis are already exacerbating these capacity challenges, and the USFS will doubtlessly need more resources to effectively implement a climate resilience rulemaking. While the responsibility to provide adequate funding for the USFS ultimately lies with Congress, there are changes that the agency can make on its own that will make climate adaptation more feasible. These include improving the hiring process, addressing staff retention, establishing better incentives for employees to remain in a single location, and exploring where Bipartisan Infrastructure Law and Inflation Reduction Act funding might be used to address staffing challenges related to climate change.

D. Climate Resilience in Eastern Forests

¹⁴ A Case for Bold Investment in the Forest Service, Policy Report, Outdoor Alliance, The Mountaineers, and Winter Wildlands Alliance (2021), *available at* <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/606b85ef726e3c443430b1f8/1617659376833/Forest+Service+funding+report+April+2021+%281%29.pdf>.

The ANPRM notes that eastern forests “have not been subject to the dramatic wildfire events and severe droughts occurring in the west, but eastern forests are also experiencing extreme weather events and chronic stress, including from insects and disease, while continuing to rebound from historic management and land use changes.” Due to their close proximity to numerous population centers, as well as the relative lack of federal public land in the east, eastern forests are enormously important to the outdoor recreation community. Because many eastern forests are highly fragmented and interspersed with private lands, we recommend working with land trusts and other partners to accelerate land acquisition to support climate resiliency in the east. We also recommend emphasizing forest conservation strategies that protect ecosystem characteristics, such as old growth forest structure, that tend to be underrepresented in eastern forests.

E. Cross-Jurisdictional Impacts

We appreciate the consideration of cross-jurisdictional impacts in the ANPRM. Climate change and its associated impacts on people and ecosystems do not abide by jurisdictional boundaries. Addressing climate resilience across the NFS will require close coordination across public, private, and Tribal lands. Forest plans and existing USFS strategies already include mechanisms for working across land ownership boundaries. These mechanisms should be strengthened through a climate resilience rulemaking and should account for recreational values of rivers, winter recreation terrain, and other features that may require cross-boundary recreation management.

5. Conclusion

Thank you for your work to support climate-informed management of our National Forests, 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 help our public lands, and the recreation experiences that they provide, adapt to the climate crisis.

Best regards,



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Louis Geltman
Policy Director
Outdoor Alliance

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Shoren Brown
Vice President, Public Affairs
The Conservation Alliance

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Rich Harper
Director of Government Affairs
Outdoor Industry Association

cc: Jamie Ervin, Policy Associate, Outdoor Alliance



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.

Outdoor Industry Association (OIA) is the national trade association for the outdoor industry and is the title sponsor of Outdoor Retailer, the largest outdoor products tradeshow in North America. OIA serves over 1,300 manufacturers, suppliers, and retailers through a focus on international trade and public lands and recreation policy, sustainable business innovation and outdoor participation.