



March 17, 2025

Ms. Jacque Buchanan, Regional Forester
Pacific Northwest Region
USDA Forest Service
1220 SW 3rd Avenue Ste. G015
Portland, OR. 97204

Submitted via webportal:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

**RE: Draft Environmental Impact Statement on Northwest Forest Plan
Amendment #64745**

Dear Ms. Buchanan:

Outdoor Alliance, Outdoor Alliance Washington, and Outdoor Alliance California welcome the opportunity to comment on the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (DEIS) to evaluate the effects of amending the Northwest Forest Plan (NWFP or Plan). We represent the human powered outdoor recreation community in the NWFP area and nationally.

On February 2, 2024, we provided detailed scoping comments on the Notice of Intent (NOI) for this amendment process in which we provided support for the Forest Service's goal of modernizing the 1994 NWFP to improve wildfire resilience, climate adaptation, mature and old growth forest conservation, community

sustainability, and Tribal inclusion. We also discussed the importance of outdoor recreation in the NWFP area and the need to more thoroughly integrate outdoor recreation into the proposed amendment.

Overall, we continue to support the Forest Service's efforts to modernize the 1994 NWFP to improve climate resilience and the progress made to improve climate- and wildfire-resilient outdoor recreation opportunities. In general, we support Alternative B, with a few suggestions for improvement that we outline in our comments. Alternative B most closely aligns with the FAC's recommendations and represents a balanced approach to modernized forest management across the NWFP area. We particularly support Alternative B's plan components to encourage Tribal co-stewardship and incorporation of Indigenous knowledge into forest management, as well as provisions to conserve previously unprotected old-growth forests and strengthen the capacity of Northwest forests to adapt to the impacts of climate change. We appreciate the inclusion of plan components that address climate- and fire-resilient recreation and have several suggestions for improving these provisions in the final NWFP amendment. In these comments, we encourage the agency to strengthen protections for late-successional forests and more robustly integrate outdoor recreation into the final NWFP amendment.

1. Introduction

While the 1994 NWFP made historic improvements in old-growth forest conservation, changes in ecological and social conditions necessitate that the Plan be updated to improve resilience to climate change and high-severity wildfire, uphold trust responsibilities and protected Tribal rights, and improve the economic sustainability of forest-dependent communities. The NOI and DEIS appropriately recognize this need for change and outline five interrelated topic areas including wildfire resilience, climate adaptation, forest stewardship, Tribal inclusion, and rural communities.

In our comments on the NOI, we argued that the growing importance of recreation to social and economic sustainability within the plan area is a key reason for the need to amend the plan, and therefore outdoor recreation should be more

thoroughly incorporated into the need for change, DEIS, and proposed action. Our comments detailed numerous ways that outdoor recreation could be integrated into the five interrelated topics.¹

Betsy Robblee, member of the NWFP Federal Advisory Committee (FAC) representing recreation organizations, has been deeply involved in the NWFP amendment process and contributed to several recreation-related provisions in the FAC's final recommendations to the Forest Service.² These plan components seek to support climate- and wildfire-resilient recreation opportunities by integrating outdoor recreation considerations into the amendment's wildfire resilience and climate adaptation strategies.

While we are pleased to see some of these provisions included in the proposed action, we believe there is an opportunity to strengthen these plan components to better reflect the FAC's intent. We also share some additional opportunities for recreation to be integrated throughout the amendment, including incorporating plan components in Alternative C and D into the final amendment.

A. Summary of Recommendations

- Advance all of the Tribal Inclusion plan components analyzed in each of the action alternatives in the DEIS and revise and further expand the Tribal Inclusion section in the final EIS.
- More thoroughly incorporate recreation into the Forest Stewardship section.
 - Strengthen Potential Management Approaches for dry forests.
 - Add additional Potential Management Approaches in moist forest and Adaptive Management Areas.
- Strengthen protections for moist late-successional forests.

¹ Outdoor Alliance, Outdoor Alliance Washington, Outdoor Alliance California, The Conservation Alliance, and Outdoor Industry Association comments on the Notice of Intent to Develop Northwest Forest Plan Amendment #64745, available at https://www.mountaineers.org/conservation/advocacy/comment-letters/2024-comment-letters/02-02-24-nwfp-noi-comment_outdoor-alliance.pdf

² NWFP FAC recommendations to the Forest Service, 2-2, 3-5, 5-6, 3-7, 3-9, 3-25, 3-26, 4-8, 4-9, 4-21. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1188978.pdf

- Changes needed to the maximum age of moist LSR stands eligible for thinning.
- Changes needed to language to maintain or restore habitat for species that depend upon young stands.
- Retain new protections for mature and old-growth forest stands in Matrix.
- More thoroughly incorporate recreation into the Fire Resilience section.
 - Strengthen recreation-related Fire Resilience plan components in Alternative B.
 - Include recreation-related Fire Resilience plan components from Alternative C and D in the final amendment.
- More thoroughly incorporate recreation into the Climate section.
 - Include recreation-related climate plan components from Alternative D in the final amendment.
 - Include an Objective to identify the minimum Forest Service road system.
- More thoroughly incorporate recreation into the Sustainable Communities section.
 - Include sustainable recreation management plan direction in the final NWFP amendment.
 - Add a recreation-related Sustainable Communities Objective in the final amendment.
 - Strengthen recreation-related Sustainable Communities plan component in Alternative B.
 - Include recreation-related Sustainable Communities plan components from Alternative C in the final amendment.
 - More thoroughly analyze environmental consequences to recreation.

2. Tribal Inclusion

Consistent with our scoping comments, our organizations strongly support expanded opportunities for Tribal co-stewardship and inclusion of Indigenous knowledge in forest management. The development and implementation of the 1994 NWFP lacked meaningful engagement with Tribal governments and communities, and as a result of this injustice, forest management in the NWFP area

(and across the country) fails to adequately recognize and support Tribal sovereignty and co-stewardship. The Forest Service must rectify this historical wrong in order to fulfil its trust responsibilities to the more than 80 Tribal governments and Indigenous communities across the NWFP area.

The DEIS contains wide-ranging plan components to advance Tribal inclusion in national forest management. These were derived from the NWFP FAC's consensus recommendations, input gathered from Tribal roundtable discussions, public scoping letters, and participation of Tribal staff on the DEIS writing team. As a result, the Tribal Inclusion plan components in the Proposed Action are groundbreaking and represent a significant improvement from the 1994 NWFP.

We urge the Forest Service to advance all of the Tribal Inclusion plan components analyzed in each of the action alternatives in the DEIS and ask the agency to revise and further expand the Tribal Inclusion section in the final EIS. The Final EIS should explicitly highlight the major differences between the No Action Alternative and Alternative B's Tribal Inclusion plan components, as this comparison is essential for understanding how the final amendment would advance the federal trust responsibility and support Tribal sovereignty. Expanding the Tribal Inclusion section of the Final EIS would provide a more comprehensive analysis of the impacts of the proposed amendment on Tribes.

In regards to recreation specifically, we recognize the need to sustainably manage recreation to minimize impacts on Tribal rights and interests, including treaty rights. We support the Tribal Inclusion plan components in the Proposed Action that impact outdoor access and recreation. This need also underscores the importance of additional plan components that address sustainable recreation management, which we discuss later in our comments. The outdoor recreation community is committed to improve our own engagement with Indigenous communities, educate recreationists about Tribal rights and responsible recreation, and advocate for resources to better protect natural and cultural resources.

3. Forest Stewardship

Mature and old-growth forests support a wide range of critical ecosystem services and also provide spectacular settings for outdoor recreation activities throughout the NWFP area. 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. Protecting these experiences for future generations is a high priority for the outdoor recreation community.

A. More Thoroughly Incorporate Recreation into the Forest Stewardship Section

Strengthen Potential Management Approaches for Dry Forests: We encourage the Forest Service to strengthen Potential Management Approaches for Dry Forests to account for recreation assets in project planning for dry forest restoration projects. As we detailed in our scoping comments, there is considerable opportunity to incorporate outdoor recreation into the design and implementation of forest restoration projects.³ Examples include targeting restoration projects in forests that contain high value recreation infrastructure, rehabilitating recreation infrastructure like trails during project implementation, designing restoration projects in a way that enhances backcountry ski terrain (i.e. glading), designing and locating projects to maximize benefits for scenic integrity, including necessary analysis for recreation infrastructure improvements in project decision documents for vegetation management projects, or combining vegetation management and recreational trails such as the Fire-Hardened Trails concept implemented in the Sierra Buttes Trail Stewardship Connected Communities project.⁴ We appreciate the inclusion of recreation into FORSTW-ALL-DRY-PMA (p. A1-23), but believe there is an

³ Outdoor Alliance, Outdoor Alliance Washington, Outdoor Alliance California, The Conservation Alliance, and Outdoor Industry Association comments on the Notice of Intent to Develop Northwest Forest Plan Amendment #64745, available at https://www.mountaineers.org/conservation/advocacy/comment-letters/2024-comment-letters/02-02-24-nwfp-noi-comment_outdoor-alliance.pdf

⁴ Fire-Hardened Trails Report, Sierra Buttes Trail Stewardship in partnership with U.S. Forest Service Pacific Southwest Region 5. <https://sierratrails.org/wp-content/uploads/2024/05/Appendix-7-Fire-HardenedTrail-Vegetation-Management-Corridors-Prescription.pdf>

opportunity for standalone Guidelines or Potential Management Approaches that support co-benefits for outdoor recreation.

Recommendation: Add a Guideline or Potential Management Approach to the **Dry** Forest Stewardship section, such as:

Reduce wildland fire risks to outdoor recreation assets and their associated community benefits by prioritizing vegetation management activities in dry forests that also benefit recreation infrastructure and settings.

Add a Guideline or Potential Management Approach to the **Dry** Forest Stewardship section, such as:

Design forest stewardship activities to seek co-benefits for sustainable recreation infrastructure and scenic values, by incorporating recreation improvements in the necessary analysis for vegetation management activities. Wherever possible, design forest stewardship projects with input from recreation staff.

These Guidelines or Potential Management Approaches could also be paired with a Desired Condition similar to the FAC's consensus recommendation 3-5⁵:

Forest health and fuels treatment projects minimize negative impacts and seek benefits to recreation infrastructure and settings. Trails and other recreation infrastructure are rehabilitated when impacts are unavoidable.

Add Additional Potential Management Approaches in Moist Forest and Adaptive Management Areas: We encourage the Forest Service to better integrate outdoor recreation into the Forest Stewardship section of the NWFP amendment, in part by adding additional Potential Management Approaches in Moist Forest and Adaptive Management Areas encouraging line officers to account for recreation assets (trail networks, climbing areas, rivers, etc) in project planning for forest stewardship projects in moist forests and Adaptive Management Areas. Examples include targeting restoration projects in forests that contain high value recreation infrastructure, rehabilitating recreation infrastructure like trails during project

⁵ NWFP FAC recommendations to the Forest Service, 3-5. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1188978.pdf

implementation, designing restoration projects in a way that enhances backcountry ski terrain (i.e. glading), designing and locating projects to maximize benefits for scenic integrity, or including necessary analysis for recreation infrastructure improvements in project decision documents for vegetation management projects. These management approaches will help ensure that the implementation of the NWFP amendment proceeds in a way that is synergistic with recreation values and will help build public support for the agency's forest restoration work.

Recommendation: Add a Potential Management Approach to the **Moist** Forest Stewardship sections, such as:

Design forest stewardship activities to protect and enhance recreational resources, including sustainable recreation infrastructure and scenic values. Wherever possible, design forest stewardship projects with input from recreation staff.

This could also be accomplished by adding the following factor to FORSTW-MTX-MOI-GDL-02 (p. A1-20):

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

- **Add:** Improving existing or potential dispersed recreation opportunities."

Likewise, a similar factor could be added to both FORSTW-MTX-MOI DC 04 (p. A1-19) and FORSTW-ALL-DRY-DC 09 (p. A1-22):

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

- **Add:** Improving existing or potential dispersed recreation opportunities."

B. Strengthen Protections for Moist Late-Successional Forests

Changes Needed to Maximum Age of Moist LSR Stands Eligible for Thinning: Alternative B and D propose raising the maximum age of young moist Late Successional Reserve (LSR) stands eligible for thinning from 80 to 120 years old. While we are encouraged by the fact that the underlying NWFP direction for LSRs remains intact, and the purpose of such treatment continues to be to produce older,

late-successional forest conditions, we are concerned that this change does not differentiate between naturally-regenerated and previously managed forests. For naturally-regenerated stands, a passive stewardship approach is an appropriate management strategy to accomplish old-growth conservation goals. Especially in wetter, infrequent-fire forests, such as those of the western Cascades, proactive stewardship actions are less clearly scientifically justified in naturally-regenerated stands.

Recommendation: We encourage the Forest Service to develop plan components that establish a preference or prioritization towards proactive stewardship activities to encourage old-growth characteristics in previously managed forests, where such actions are more clearly scientifically justified.

Changes Needed to Language to Maintain or Restore Habitat for Species that Depend Upon Young Stands: We are particularly concerned with a portion of FORSTW-LSR-MOI-GDL-01 (p. A1-18) regarding management of young moist forest stands less than 120 years old in LSRs. It states that “forest management activities should be designed to maintain or restore late-successional and old-growth forest conditions that...(b) maintain or restore habitat for other species that depend upon younger stands...” This language in subsection (b) contradicts the FAC’s recommendations and would undermine the NWFP’s management emphasis for young moist stands in LSRs. LSRs were established explicitly to support late-successional habitat—while early-successional habitat can be an ecologically valuable component of LSRs, such habitat will be provided through natural disturbances and potentially Tribal co-stewardship. We are concerned that the proposed language would allow for heavy thinning or even clearcutting of mature moist stands in LSRs.

Recommendation: We ask the Forest Service to either strike section b of FORSTW-LSR-MOI-GDL-01 or change “younger stands” to “late-successional forest conditions” or “older forest conditions.”

C. Retain New Protections for Mature and Old-Growth Forest Stands in Matrix

Our organizations strongly support new protections from timber harvest for previously unprotected old-growth forest stands in moist Matrix, specifically FORSTW-MTX-MOI-STD-01 and FORSTW-MTX-MOI-GDL-01 (p. A1-20). We ask the Forest Service to retain these plan components in the final amendment. We expect this new management direction to enhance outdoor recreation on thousands of acres of older moist Matrix forest, including paddling runs along the Lewis River in Washington and mountain bike trails near Oakridge in Oregon.

4. Fire Resilience

Outdoor recreation activities are increasingly affected by the impacts of climate change and severe wildfires. In 2023, Outdoor Alliance 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.⁶ 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. In our view, Alternative B and components of Alternative D respond to this need through provisions to encourage accelerated dry forest restoration, expanded use of ecologically appropriate mechanical thinning, and an increase in the use of wildland fire. We encourage the Forest Service to retain plan components directed towards retaining larger, older trees, especially in mature and old-growth forests⁷. While the topics of appropriate staffing and funding are outside of the forest plan amendment process, it is imperative that this new plan direction is paired with adequate funding to ensure that non-commercial treatments like thinning and prescribed fire—essential for achieving fire resilience and other desired conditions—occur alongside commercial thinning.

A. More Thoroughly Incorporate Recreation into the Fire Resilience Section

⁶ Ervin, Jamie. 2023. Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future. Policy Report. Outdoor Alliance, Washington, D.C.

⁷ NWFP Amendment DEIS, FORSTW-MTX-MOI-GDL-03 and FORSTW-MTX-MOI-GDL-04 (p. A1-20), FORSTW-ALL-DRY-STD-01 (p. A1-22), FORSTW-ALL-DRY-GDL-02 and FORSTW-ALL-DRY-GDL-03 (p. A1-23).

Strengthen Recreation-Related Fire Resilience Plan Components in Alternative B: We are pleased that the Forest Service included in Alternative B versions of several of the FAC's consensus recommendations for recreation-related fire resilience plan components.⁸ These plan components should be revised to better reflect the FAC's recommendations. In particular, the FAC recommended a Standard (3-7) to repair trails and recreation infrastructure impacted by fire or damaged by fire suppression operations to meet agency standards. The intent of this recommendation is to ensure that valuable recreation infrastructure is not permanently lost to catastrophic wildfire and is expeditiously restored for public access.

The agency represented the intent of this recommendation in a Potential Management Approach: FIRE-ALL-PMA-B (p. A1-27):

Promote rehabilitation of recreation infrastructure, where desirable and feasible, during post-disturbance management. Within disturbed areas, prioritize forest health, hazard tree and vegetation removal near trails, slope stabilization around trails, and restore affected outdoor recreation facilities.

Turning a Standard into a Potential Management Approach and including the caveat "where desirable and feasible" weakens the FAC's intent. This proposed management direction does not ensure that managers will work to restore trails and recreation infrastructure or find alternative locations for these values.

Recommendation: Convert FIRE-ALL-PMA-B to a Guideline:

Rehabilitate trails and recreation infrastructure during post-disturbance management.

Consider adding a Desired Condition that trails and recreation infrastructure are restored following wildfire and other disturbances.

Include Recreation-Related Fire Resilience Plan Components from Alternative C and D in Final Amendment: We appreciate that the Forest Service included additional recreation-related fire resilience plan components in Alternative C and D and

⁸ NWFP FAC recommendations to the Forest Service, 3-5, 3-6, 3-7, 3-9, 3-25, 3-26. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1188978.pdf

believe they should be included in the final amendment. These plan components will help ensure wildfire-resilient recreation opportunities, provide co-benefits to fire resiliency and recreation, and encourage the public to recreate responsibly in the Pacific Northwest's fire-adapted landscapes.

Recommendation: Include FIRE-ALL-DC-03-D (p. A2-19) and FIRE-ALL-GOAL-02-D (p. A2-19) in the final NWFP amendment.

4. Climate, Ecosystem Integrity, and Carbon

In addition to increased wildfire, other climate change impacts will also affect outdoor recreation in a variety of ways through loss of snowpack, increasing temperatures, and increased flooding and erosion. Our organizations support provisions of the DEIS and proposed action that seek to support adaptation of ecosystems and infrastructure to climate change. We are particularly pleased with plan components in Alternative B that address the resilience of outdoor recreation to climate change. We ask the Forest Service to retain these plan components in the final NWFP amendment, specifically CLIMATE-DC-04, CLIMATE-DC-05, and CLIMATE-PMA (p. A1-28 and A1-29) regarding closures.

A. More Thoroughly Incorporate Recreation into the Climate Section

Include Recreation-Related Climate Plan Components from Alternative D in Final Amendment: We are pleased that the Forest Service included an additional recreation-related climate plan component (CLIMATE-GDL-03-D) in Alternative D and believe it should be included in the final amendment. We especially appreciate that CLIMATE-GDL-03-D is responsive to the *Bioregional Assessment of Northwest Forest's* recommendation that "Land management plans need proactive direction to address the potential effects of climate change and other landscape-altering events on recreation and its infrastructure."⁹ This Guideline will help ensure recreation infrastructure is adapted to the impacts of climate change.

⁹ Bioregional Assessment of Northwest Forests, p. 65.

Recommendation: Include CLIMATE-GDL-03-D (p. A2-17) in the final NWFP amendment.

B. Climate Change and the Forest Service Road System

Include an Objective to Identify the Minimum Forest Service Road System: The Forest Service road system in the NWFP area is simply too large to maintain with current funding levels and a changing climate that brings more flooding and erosion. While priority Forest Service roads should be maintained for public access and wildfire response, the Forest Service must align its road system with the realities of climate change, declining budgets, and riparian and water quality needs.

Recommendation: Include an Objective to identify the minimum Forest Service road system.

Within 5 years, identify the minimum Forest Service road system needed for safe efficient travel, climate resiliency, and wildfire suppression. Maintain roads to provide public access and meet management objectives. Consider converting roads to trails where feasible to maintain recreational access.

5. Support Economic Opportunities and Sustainable Communities

A. More Thoroughly Incorporate Recreation into the Sustainable Communities Section

Include Sustainable Recreation Management Plan Direction in the Final NWFP Amendment: According to the DEIS, recreation visitation is the largest contributor to the regional economy, supporting an estimated 12,551 jobs and contributing a total of \$628.3 million in labor income.¹⁰ Given the importance of recreation to the social and economic sustainability of the NWFP area, it is disappointing that the Proposed Action does not provide for landscape level, consistent management direction for sustainable recreation in the NWFP region. In our scoping comments, we pointed out that the 1994 NWFP does not provide uniform management direction related to recreation, and that the *Bioregional Assessment* recommends consistent recreation

¹⁰ NWFP DEIS, p. 3-109

management direction across the NWFP area to effectively and efficiently sustain recreation opportunities given increased use.¹¹ We asked the Forest Service to consider a number of sustainable recreation plan components, many of which are from recent forest plans revised under the 2012 planning rule. While we understand that sustainable recreation management was deemed out of scope for the NWFP amendment, we continue to believe this is a missed opportunity to address a key need for the economic and social sustainability of communities within the NWFP area.

Recommendation: We encourage the Forest Service to include additional sustainable recreation management direction to enhance the economic benefits of outdoor recreation for rural communities, such as our suggestions provided in our scoping comments on page 17.¹²

Add a Recreation-Related Sustainable Communities Objective in Final Amendment: The outdoor recreation economy in the Pacific Northwest has grown significantly since 1994. Outdoor recreation accounts for 2.7 percent of the state GDP in Washington, 2.5 percent in Oregon, and 2.0 percent in California according to the Bureau of Economic Analysis.¹³ Given the importance of outdoor recreation to regional economies within the NWFP area, the final NWFP amendment should include an Objective to better support recreation alongside the other multiple uses of Forest Service land. 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 million board feet (MMBF) sold as the sole metric for economic sustainability, ECONSUST-OBJ should include a second objective that considers the multiple uses of National Forest land.

¹¹ Bioregional Assessment, p. 65.

¹² Outdoor Alliance, Outdoor Alliance Washington, Outdoor Alliance California, The Conservation Alliance, and Outdoor Industry Association comments on the Notice of Intent to Develop Northwest Forest Plan Amendment #64745, available at https://www.mountaineers.org/conservation/advocacy/comment-letters/2024-comment-letters/02-02-24-nwfp-noi-comment_outdoor-alliance.pdf

¹³ U.S. Bureau of Economic Analysis, BEA 23-54, Outdoor Recreation Satellite Account, U.S. and States, 2022, (2023).

Recommendation: We encourage the Forest Service to include an additional Objective in the final NWFP amendment:

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.

Strengthen Recreation-Related Sustainable Communities Plan Component in Alternative B: We are pleased that the Forest Service included in Alternative B a version of one of the FAC's consensus recommendations for recreation-related sustainable communities plan components, 2-2.¹⁴ This plan component, ECONSUST-DC-02-B (A1-30), should be revised to better reflect the FAC's recommendations.

ECONSUST-DC-02-B reads:

Recreation activities across national forests within the Northwest Forest Plan area contribute to the sustainability of the cultural, social, and economic values of local communities and Tribes. This is achieved by providing recreation opportunities that meet the needs of populations underserved by public lands recreation and contribute to stability and growth in local communities and economies.

The second sentence implies that recreation activities contribute to sustainability solely by providing recreation opportunities that meet the needs of populations underserved by public lands recreation. The intent of the FAC's recommendation 2-2 is broader than just focusing on underserved populations.

Recommendation: Retain the FAC's language in 2-2 or change ECONSUST-DC-02-B to read:

Recreation activities across national forests within the Northwest Forest Plan area contribute to the sustainability of the cultural, social, and economic values of local communities and Tribes. This is achieved by providing recreation opportunities that meet the needs of populations, ***including those***

¹⁴ NWFP FAC recommendations to the Forest Service, 2-2. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1188978.pdf

underserved by public lands recreation, and contribute to stability and growth in local communities and economies.

Include Recreation-Related Sustainable Communities Plan Components from Alternative C in Final Amendment: We are pleased that the Forest Service included an additional recreation-related sustainable communities plan component (ECONSUST-PMA-C) in Alternative C and believe it should be included in the final amendment.

ECONSUST-PMA-C (p. A2-17) reads:

Consider the value of recreation infrastructure when designing permanent fuel breaks so that the Forest Service can reduce wildland fire risks to outdoor recreation assets and their associated community benefits while still maintaining the scenery management objectives of a given area.

While we believe ECONSUST-PMA-C could also be in the Fire Resilience section, nevertheless we support including it in the final NWFP amendment. This plan component is a recommendation in the California Wildfire & Forest Resilience Task Force's "California's Joint Strategy for Sustainable Outdoor Recreation & Wildfire Resilience," which we cite in our scoping comments.

Recommendation: Include ECONSUST-PMA-C (p. A2-17) in the final NWFP amendment.

More Thoroughly Analyze Environmental Consequences to Recreation: The DEIS includes a limited analysis of the environmental consequences of the action alternatives to recreation (p. 3-151). It states that "the proposed amendment may affect the use of recreation areas in the NWFP area, but given the programmatic level of this assessment, impacts to individual areas or uses, and related impacts to the recreation visitor-related economy cannot be determined at this time and will instead be considered in future project-level analyses" (3-152). The action alternatives propose timber harvest on as many as 810,000 acres per decade and fuel treatment and wildland fire on millions of additional acres. This increase in active management has the potential to significantly affect outdoor recreation opportunities and the outdoor recreation economy.

Recommendation: Include a thorough analysis of the environmental consequences of the preferred alternative in the Final EIS, including using GIS to map recreation assets with areas where restoration and fuels treatments are anticipated and analyzing expected impacts.

6. Conclusion

Thank you for your work to modernize the NWFP in light of current challenges, and thank you for considering our input. The outdoor recreation community appreciates the opportunity to provide comments on the NWFP Amendment DEIS and look forward to working with you to finalize and successfully implement the amendment.

Best regards,



Louis Geltman
Vice President for Policy and Government Relations
Outdoor Alliance



Betsy Robblee
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Conservation and Advocacy Director, The Mountaineers



Katie Hawkins
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Rebekah Phillips, Executive Director, the Mazamas
Madeline Bachner Lane, Chief Executive Officer, Colorado Mountain Club
Chad Nelsen, Chief Executive Officer, Surfrider Foundation

Steve Messer, Board President, California Mountain Biking Coalition
Eddie Espinosa, Executive Director, Evergreen Mountain Bike Alliance
Taylor Luneau, Board Member, Washington Climbers Coalition
Michael DeCramer, Policy and Planning Manager, Washington Trails Association

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.

Outdoor Alliance Washington is a network of member-based organizations representing the human powered outdoor recreation community in Washington and the thousands of Washingtonians who climb, paddle, mountain bike, hike, and enjoy coastal recreation on our state's public lands and waters. Our members include American Whitewater, Evergreen Mountain Bike Alliance, The Mountaineers, Surfrider Foundation, Washington Climbers Coalition, and Washington Trails Association.

Outdoor Alliance California and its member organizations—Access Fund, American Whitewater, California Mountain Biking Coalition (CAMTB), International Mountain Bicycling Association (IMBA), Surfrider Foundation, and Winter Wildlands Alliance—represent tens of thousands of human-powered recreationists across the state of California: climbers, paddlers, surfers, mountain bikers and skiers working together to achieve robust land protections, equitable access to public lands and waters, nature-based climate solutions, shared stewardship, and sustainable recreation management on public lands and waters.