OUTDOOR ALLIANCE

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United States Forest Service
United States Department of Agriculture
1400 Independence Ave. SW
Washington, D.C. 20250

Submitted via: https://www.regulations.gov/document/FS-2025-0034-0001

Re: Comments on Environmental Assessment for Post-Fire Recovery Actions on National Forest System Lands, Docket Number FS-2025-0034

Director Lohr:

On behalf of the human-powered outdoor recreation community, thank you for the opportunity to comment on the Notice of Intent (NOI) for the Environmental Assessment for Post-Fire Recovery Actions on National Forest System (NFS) Lands (hereinafter "Post-Fire EA"). Outdoor Alliance supports the proposed action's intent—streamlining environmental analysis and decision making in order to help forests and local communities recover more quickly from wildfires. However, we are concerned that some post-fire actions included in the EA, especially salvage logging, tend to have significant environmental impacts that require site-specific consideration through NEPA. These comments describe post-fire recreation management actions that may be appropriate for national-level analysis, identify recreation values that require site-specific analysis, and outline our questions and concerns regarding the design and implementation of the Post-Fire EA.

Outdoor Alliance is a coalition of nine 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, 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.

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Outdoor recreationists across the country, and particularly in the western U.S., are accustomed to wildfires affecting lands and waters with important recreation values. Wildfire is an essential ecological process across much of the west, and many western forests evolved under the influence of regular fires ignited both naturally and by people, including fires lit intentionally for cultural and ecological purposes. Wildfire can play both a destructive and restorative role on landscapes that recreationists value, and adapting to wildfire is an inevitable and necessary part of living and recreating in the western U.S.

In recent decades, the western U.S. has seen an increase in wildfire activity due to multiple factors, including widespread fire suppression, removal of indigenous fire stewardship, climate change, development in fire-prone areas, and legacy effects from logging and other land management practices. This increase in wildfire has significantly affected human-powered outdoor recreation resources. For example, from 2018–2022 alone, wildfires affected more than 23,750 trail miles, more than 1,360 climbing sites, and more than 1,708 miles of whitewater paddling runs.[1] In many of these cases, wildfires burned at low or moderate severity and caused little-to-no damage to recreation resources, but in others fires burned more intensely and caused extensive damage to recreation values. In either scenario, post-fire recovery actions can independently create substantial impacts to recreation infrastructure and the recreation setting if they are not deliberately designed to protect trails, trailheads, and associated visitor experience values (including visual and auditory resources).

Outdoor recreationists, including Outdoor Alliance member organizations, have invested significant time and resources in recent years in rehabilitating recreation sites on Forest Service lands and reopening access to these areas following wildfires. The process of reopening access often takes many years, even when local organizations work closely with USFS staff and bring in outside resources to support restoration. These delays are often the result of factors outside of the NEPA process, including resource and capacity limitations, competing land management priorities, and safety concerns. However, we have also experienced instances where restoration work has been delayed significantly while the agency completes project-level NEPA—often for land management activities unrelated to

[1] 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).

outdoor recreation—and we hope that the Post-Fire EA will provide some efficiencies in these scenarios.

A national post-fire decision framework should not come at the expense of recreation values; instead, it should provide clarity and efficiency while establishing consistent, enforceable protections for recreation assets and recreation settings across forests. Our high level comments and concerns include:

- The USFS must provide more detail about how a national post-fire decision will be implemented and must pursue individual post-fire projects transparently, with support from public input;
- The Post-Fire EA must explicitly treat trail systems, both developed and dispersed, as public infrastructure investments and require a clear "protect, avoid, minimize, then mitigate" framework for any impacts to trails, trailheads, and recreation settings (including visual and auditory resources) from post-fire operations;
- the Post-Fire EA should include standard design criteria and implementation requirements that prevent post-fire operations (e.g., hazard tree removal, salvage, temporary access, staging, hauling) from unnecessarily damaging recreation infrastructure or degrading scenic and soundscape conditions;
- The Post-Fire EA should require monitoring and adaptive management that includes trail condition, visitor access, and user-conflict indicators during and after implementation, with commitments to timely repair/rehabilitation if impacts occur.
- Certain values, such as effects on Wild and Scenic Rivers, require site-specific consideration through NEPA and should not be evaluated through the Post-Fire EA;
- The Post-Fire EA should not amount to a blanket approval for post-fire activities such as salvage logging that are known to have significant environmental impacts;
- Post-fire restoration activities must be designed to enhance long-term landscape fire resilience.

Our comments are described in more detail in the sections below.

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NEPA Application and Level of Analysis

The proposed action represents a major change to the USFS's approach to post-fire environmental analysis, but this change is not adequately described in the NOI. The NOI does not explain how the USFS plans to implement individual post-fire decisions under the Post-Fire EA. Without this information, stakeholders cannot clearly understand the agency's intention for the proposed action, how it will affect post-fire decisions, or how it will affect the public's role in informing post-fire management on National Forests. For example, it is unclear whether individual forests will analyze post-fire projects through separate EAs, through categorical exclusions, or through decision documents outside of the NEPA process. At a minimum, the Post-Fire EA must clearly describe (1) how site-specific determinations will be made under the national decision, (2) how the public will be notified of specific projects and implementation schedules, and (3) what minimum design criteria will apply everywhere—especially for recreation assets and recreation settings. The USFS should also commit to informing the public about project proposals and commit to soliciting public input for post-fire projects.

The NOI also does not explain why an EA is the appropriate level of NEPA review for a national-level decision intended to cover actions with significant environmental impacts over all National Forests. In many cases, the USFS has completed Environmental Impact Statements (EISs) for individual post-fire decisions. Considering that the post-fire EA will cover actions like salvage logging—shown to have significant environmental impacts—over a wide variety of ecological settings, an EIS is likely a more appropriate level of NEPA review. We also recommend that the draft EA consider an alternative that would analyze multiple post-fire decisions for different geographic areas, such as USFS regions. Given the wide range of forest conditions and fire regimes across the US, regionally-tailored decisions are more likely to achieve the USFS's goal of making post-fire management more efficient while satisfying NEPA's substantive requirements.

Finally, the USFS must make public the "national review of Forest Service post-fire recovery analyses under the National Environmental Policy Act" referenced in the NOI. This review serves as the basis for the agency's broad determination that "regardless of location, these projects occur in a relatively similar manner and have similar environmental effects across the agency," which underpins the agency's

entire justification for the Post-Fire EA. Including this review as an appendix to the draft EA will help the public understand the agency's reasoning.

Restoring Recreation Access Post-Fire

As we outline above, outdoor recreationists regularly work alongside the USFS and volunteers to reopen access to recreation sites post-fire. This work includes a wide range of activities, including trail and road repair, trail rerouting, tree clearing, slope stabilization, hazard assessments along rivers, and more. In fire-prone landscapes, from chaparral systems in California to pine and mixed-conifer forests in New Mexico, Colorado, Wyoming, Montana, and elsewhere, recreation infrastructure, including trails, is both highly valued and highly vulnerable. Because post-fire recovery methods vary by ecosystem and risk profile, the Post-Fire EA should ensure consistency in recreation protections while allowing site-appropriate implementation. The sections below outline our individual comments related to recreation access:

Prioritize recreation: The Post-Fire EA should make clear that restoring safe recreation access to both developed and dispersed recreation opportunities is a priority for the USFS's post-fire work. Although it varies considerably between individual forests and ranger districts, our experience has been that recreation is often not treated as a priority by USFS land managers and that getting the USFS to prioritize funding and staff time for restoring recreation access post-fire often requires sustained outreach from recreation advocates. The Post-Fire EA should elevate recreation as a priority by clearly including restoring access to both developed and dispersed recreation opportunities as an objective of post-fire management and by analyzing the environmental impacts of actions that are common to rehabilitating trails and other recreation infrastructure. The Post-Fire EA should also recognize that protecting existing recreation infrastructure during recovery actions is a core element of fiscal responsibility: it preserves prior investment, avoids avoidable repair costs, and supports local economies and communities that depend on recreation access.

Developed vs. dispersed recreation: Many of the recreational activities represented by Outdoor Alliance's member organizations—climbing, whitewater paddling, backcountry skiing, mountain biking—occur primarily outside of USFS developed recreation sites. These sites are often accessed by trail networks and roads that are

vulnerable to damage during wildfires. We recommend that the Post-Fire EA analyze the effects of rehabilitating roads and trails needed to access dispersed recreation sites, and we ask that access routes to these areas receive the same level of resources and priority as sites with developed infrastructure during post-fire management. Importantly, the Post-Fire EA should require that post-fire operational activities do not create new barriers to access such as avoidable long-term closures, preventable damage to trail corridors, or temporary access routes that become unauthorized permanent routes.

Timing: The timing of restoration activities can also be an important factor in long-term rehabilitation of recreation sites. High severity wildfires can severely affect soils and destabilize slopes surrounding trails and other recreation infrastructure. This damage can be exacerbated by heavy rains following a wildfire, which can cause severe erosion. Wherever possible, recreation infrastructure should be restored as quickly possible following wildfires, ideally before significant rain events. The Post-Fire EA should examine whether allowing partner organizations earlier access to burned areas to complete trail restoration work might improve recreation access and environmental conditions over the long term. Where earlier partner access is feasible, the Post-Fire EA should pair it with clear safety protocols and coordination so that partner work accelerates restoration without increasing risk.

Closures: In recent years, the outdoor recreation community has become accustomed to widespread closures of public lands following wildfires. These blanket closures can be necessary for public safety, but closures often extend for long periods of time and affect recreational activities not affected by changed forest conditions due to wildfire.[2] The Post-Fire EA should require that closures be narrowly tailored, time-limited, and paired with clear public communication. Specifically, the agency should provide timely postings at trailheads and access points describing the closure area, rationale, expected timeframe, and maps of closure areas and detours or alternate access where available. The Post-Fire EA should also encourage scheduling disruptive operations to avoid peak visitor use near high-use trails and facilities when feasible and require early notification to recreation staff so closures and communications are implemented consistently.

[2] For example, the Plumas NF closed the Wild and Scenic Middle Fork Feather River for more than two years following the 2020 North Complex despite the river being safe for boating and angling.

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Mitigation measures: Because the proposed action includes activities that often rely on heavy equipment, temporary access, staging, and repeated operations, the Post-Fire EA must be transparent about potential impacts to recreation infrastructure and recreation settings, and must include clear, enforceable design criteria that prevent unnecessary damage or degradation. This should include explicit analysis of how salvage, hazard tree operations, temporary roads, and equipment access may affect trails, trailheads, scenic integrity, and the soundscape experienced from trails and other recreation sites. In order to achieve this outcome, we suggest adopting the Protect/Avoid/Minimize/Mitigate Standard Recreation Design Criteria described below for projects occurring near trail systems, rivers, climbing areas, and other recreation resources and infrastructure:

- Protect/Avoid: Pre-implementation mapping and field verification of trail alignments and recreation assets (trailheads, kiosks, signs, benches, bridges, drainage structures), and review of implementation areas by recreation specialists before equipment use, with authority to prescribe buffers, access routes, staging locations, and timing restrictions.
- Minimize: Keep trail corridors functional and clear during operations; locate staging, decking, slash piles, and haul routes away from trailheads and popular trail segments; and avoid leaving debris or hazards within the trail corridor or sightlines.
- Visual resources: Maintain scenic integrity along trails by avoiding high-contrast debris management in foreground views near trailheads, using irregular boundaries where appropriate, and maintaining buffers/screening where feasible so treatments do not dominate casual views from high-use trails.
- Auditory resources: Manage the soundscape experienced from trails by reducing prolonged high-noise disruption near concentrated recreation areas (trailheads, campgrounds, popular trail segments) through timing, sequencing, and operational controls where feasible.
- Mitigate: If damage occurs to non-motorized trails or other recreation amenities, restore them to pre-project function promptly as part of mitigation. Require rehabilitation and visual obliteration of temporary operational tracks and access evidence so they do not become unauthorized permanent routes after the project.

- Monitoring/Adaptive management: Include trail condition checks (tread damage, drainage function, debris accumulation, signage/wayfinding) and visitor use/user-conflict indicators during and after implementation, with clear triggers to adjust operations and commitments to timely repair/rehabilitation.

Site-Specific Analysis Required for High-Value Recreation Resources

Although some post-fire projects may share common characteristics and environmental impacts, many will require site-specific analysis at the project level even if the Post-Fire EA is adopted. Recreational values differ considerably between regions, landscapes, and forests, and we are concerned that tiering individual projects to the Post-Fire EA will cause forests to overlook impacts to recreation access, infrastructure, and settings caused by salvage logging, hazard tree removal, and other activities. Certain high-value recreation resources—such as iconic mountain bike trail systems, unique viewpoints, and concentrated recreation hubs (trailheads, campgrounds, river access points) often warrant site-specific consideration because the character of the experience (including scenery and soundscape) is integral to the resource value and local economic benefit.

In particular, it is essential that the USFS continue to evaluate impacts to Wild and Scenic Rivers (WSRs) at the project level. This analysis must address each designated river segment, its specific values (free-flowing condition, water quality, and Outstandingly Remarkable Values), and be conducted in alignment with the applicable forest plan. In managing WSRs and their corridors, the Forest Service is also statutorily required under Section 10 of the Wild & Scenic Rivers Act to give "primary emphasis" to protecting aesthetic, scenic, historic, archaeological, and scientific features, and to "protect and enhance the values which caused [the river] to be included in the National Wild and Scenic Rivers System."[3] For designated rivers, the analysis shall include:

1. Identification of river segments and corridors with respect to project treatment areas;
2. Identification of each river segment's classification and outstandingly remarkable values;

[3] 16 U.S.C. § 1281(a)

3. Site-specific analysis of the project's impacts to the free-flowing condition, water quality, and outstandingly remarkable values, including impacts from actions that occur along the river, within designated corridors, and in other areas from which project activities may affect these qualities;
4. A river-focused scenery assessment with a geospatial viewshed analysis that determines the location and extent of project treatment areas visible from the full length of rivers;
5. Analysis of the project's consistency with the Forest Plan, agency policy, and the Wild and Scenic Rivers Act, including protection of free-flowing condition, water quality, and outstandingly remarkable values; and
6. Development of project design features to protect and enhance free-flowing condition, water quality, scenic, and outstandingly remarkable values.

The Post-Fire EA should acknowledge these requirements explicitly and reaffirm that they will be analyzed at the project level, both for Congressionally-designated rivers and for eligible Wild and Scenic Rivers designated through USFS land management planning. Additionally, many of these elements amount to best practices that should be applied for all river segments where recreational use occurs, regardless of designation.

Environmental Impacts of Post-Fire Actions

The NOI states that the Post-Fire EA will analyze the effects of a wide range of post-fire actions, including mechanical and non-mechanical hazardous fuels reduction, hazardous tree removal, timber salvage, reforestation, use of natural materials to restore water and soil systems, and maintenance or reconstruction of permanent roads and trails. Many of these activities are known to cause significant environmental impacts, and the scale of these impacts is highly dependent on individual project design and mitigation measures, many of which are refined considerably based on public input during project-level NEPA. Salvage logging, in particular, can significantly degrade ecological conditions in post-fire landscapes, often without clear benefits for sensitive ecosystems or wildfire resilience.

The Post-Fire EA should not amount to a rubber stamp or blanket approval for every post-fire project or for every action listed in the NOI. The Post-Fire EA should also provide clear guidance for local land managers to determine when site-specific analysis is needed. The EA should also be clear that these post-fire actions are not

needed everywhere, and that in many cases burned forests, such as complex early-seral forests, should be retained.

Building Landscape Fire Resilience

Beyond restoring access immediately post-fire, recreationists are invested in the health of National Forests over the long term. Post-fire land management actions such as reforestation should be designed in a way that promotes long term resilience to wildfire and other disturbances. Conversely, strategies such as replanting in dense, evenly spaced plantations, which can lead to homogeneous forest conditions prone to repeated high severity fire, should be avoided. Examples include planting seedlings in clusters to mimic natural regeneration following wildfires, and reintroducing prescribed fire early in stand development.[4] The Post-Fire EA should promote these reforestation strategies wherever possible and encourage USFS line officers to design reforestation projects based on local fire regimes and ecological conditions.

Post-fire restoration activities should also be designed and implemented in ways that protect recreation infrastructure and sustain the recreation setting as well. Protecting trail systems during recovery is compatible with resilient restoration when, with adequate and appropriate consideration, the agency plans access routes, staging, debris management, and mitigation deliberately and early.

* * *

Thank you for considering our community's input. We look forward to working with you to improve post-fire land management across the National Forest System.

Best regards,

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[4] *See*, Malcolm P. North et al., *Tamm Review: Reforestation for Resilience in Dry Western U.S. Forests*, 432 Forest Ecology & Management 209 (2019), https://doi.org/10.1016/j.foreco.2018.09.007.

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