

## Outdoor Alliance Washington

American Alpine Club • American Whitewater  
El Sendero Backcountry Ski Club • Evergreen Mountain Bike Alliance • The Mountaineers  
Washington Climbers Coalition • Washington Trails Association

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Joseph Adamson  
Recreation, Heritage, and Volunteer Resources Staff  
1400 Independence Avenue SW., Stop 1125  
Washington, DC 20250- 1125

Submitted online via [www.regulations.gov](http://www.regulations.gov)

**Re: Proposed Rule – Use by Over-Snow Vehicles (Travel Management Rule)**

Dear Mr. Adamson,

The American Alpine Club, American Whitewater, El Sendero Backcountry Ski Club, Evergreen Mountain Bike Alliance, The Mountaineers, Washington Climbers Coalition and Washington Trails Association – all human-powered recreation organizations in Washington State – come together as a coalition on issues relating to recreation, access and conservation. Outdoor Alliance Washington organizations represent more than 30,000 members who recreate on public lands in Washington. Together we have a significant interest in year-round travel management planning.

Travel management planning is a critical component of outdoor recreation management, and is very important to our organizations' programming and the human-powered activities our members undertake. While the process focuses on designating routes, trails and areas for motorized use, it impacts those of us that experience National Forests under our own power. Travel management planning can determine many aspects of our experiences – the sounds, the sights and the quality of trails and snow – and even whether we use or avoid an area altogether. Travel management is effectively an exercise in zoning, with the implicit recognition that not all activities can or should take place in all places, both for the sake of natural resource values and for the sake of users' experiences.

The high demand for human-powered winter recreation areas is very apparent here in Washington State. An example of this is the one SnoPark area on the I-90 corridor that is for skiing. The parking lot there on winter weekends is always overflowing, with cars parked on the on and off ramps to the highway. Given the importance of travel management planning with its role as de facto recreation management, we applaud the Forest Service for taking steps towards instituting consistent travel management, in all seasons, with the draft Over-Snow Vehicle rule. Though this draft rule is headed in the right direction, it falls short in a number of critical but addressable ways.

Simply put, it is not clear the new rule will necessitate new planning. Four components of the draft rule conspire to make this unfortunate outcome possible.

- First, the draft rule changes the definition of an area, expanding it to include delineated space nearly as large as an entire ranger district.
- Second, the draft rule does not require an analysis of trails within these areas.
- Third, it permits either “open unless closed” or “closed unless open” management.
- Fourth and finally, it allows prior travel management decisions, no matter how flawed, to be carried forward.

As a result of these interconnected components, there are far too many imaginable scenarios where the draft rule would confuse users, permit undesirable impacts on natural resources and experiences, or worst of all, effectively require no new winter travel management planning. For example, an area of hundreds of thousands of acres could be designated “open unless closed” to over-snow vehicles, with no analysis of the concentrated use on the trails within it. Then a smaller, immediately adjacent area could be designated “closed unless opened”, to the confusion of all users. Alternatively, on another Forest, a decades-old plan made without adequately minimizing natural resource impacts or user conflicts could be allowed to stand.

Here are the solutions we recommend. The simplest way to resolve these issues would be to remove the over-snow vehicle exemption from Subpart B of the 2005 Travel Management Rule. Barring that, we recommend changes to each of the components described above, with one addition.

- (1) Do not change the definition of an area from that used in the 2005 Rule.
- (2) Require trail-by-trail analysis within areas designated as open to over-snow vehicle use by removing the current exemption.
- (3) Adopt the “closed unless open” approach to be consistent with summertime travel management planning.
- (4) Only carry forward winter travel management plans that meet the procedural and substantive requirements of Subpart C of the 2005 Rule.

Additionally, we recommend taking this opportunity to proactively manage a sustainable and growing wintertime use on our National Forests: fat tired bikes. With large volume tires, these bikes float across compacted and fresh snow. Unfortunately fat bikes are frequently managed based on their having wheels rather than their limited impacts. The Forest Service should explicitly incorporate a definition of bicycles that unambiguously distinguishes them from motorized vehicles and over-snow vehicles, and provide guidance to ensure that they are managed as non-motorized use. We recommend the definition used by the National Park Service: “Bicycle. A device propelled solely by human power upon which a person or persons may ride on land, having one, two, or more wheels, except a manual wheelchair.”

Thank you for considering our recommendations for strengthening winter travel management planning. We look forward to working with the Forest Service to fill this gap in outdoor recreation management.

Best regards,

Eddie Espinosa, Northwest Region Manager, American Alpine Club  
 Thomas O’Keefe, Pacific Northwest Stewardship Director, American Whitewater  
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