

July 8, 2016

*Submitted online*

Jennifer Zbyszewski, Project Team Leader  
Okanogan-Wenatchee National Forest  
24 West Chewuch Road  
Winthrop, WA 98862

**Re: Draft Environmental Assessment Motorized Travel Management for the Okanogan-Wenatchee National Forest**

Dear Ms. Zbyszewski:

The Mountaineers respectfully submits these comments to the U.S. Forest Service on the Okanogan-Wenatchee National Forest's (OWNF) draft environmental assessment (Draft EA) for travel management planning.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." The Mountaineers Books publishing division expands this mission through award-winning publications. 1,800 skilled volunteers lead 3,200 outdoor education courses and activities annually for 15,500 members and guests. Our youth programs provide over 6,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, protecting the outdoor experience for current and future generations.

Our members are active users of OWNF, logging over 3,000 days hiking, backpacking, climbing, scrambling, snowshoeing and skiing through our trips and courses. We appreciate the opportunity to comment.

We are encouraged to see the OWNF propose changes to its travel management approach by restricting motorized use to designated roads, trails, and areas, as well as appreciating the importance of balancing multiple recreational uses on our National Forests. We are concerned about the negative impacts of unmanaged motorized use on the forest ecosystem, conflicts between types of use (motorized and non-motorized) and the impact of motorized use on those seeking a quiet experience on our public lands. We strongly support your efforts to restore a balance to the Forest and comply with subpart B of the 2005 Travel Management Rule.<sup>i</sup>

The Mountaineers supports Alternative C, as it balances recreational access, while also protecting ecosystems along dispersed campsite streams and rivers. Alternative C takes a more reasonable approach to manage motorized, facilitated, dispersed camping and would not designate 350 miles of WATV routes. We oppose the proposal to add 350 miles of WATV routes as outlined in Alternatives B and D.

*Sustainable Roads System on OWNF*

The National Forest road system is in a serious state of disrepair, and the OWNF is no exception. With about 8,000 miles of system roads, the OWNF can only afford to maintain about 18% of its system. (OWNF TAR, p. 24.) The backlog of uncompleted road maintenance work is about \$158 million. (*Id.* 24.) This growing backlog of unmaintained or under-maintained roads results in serious resource impacts. The OWNF's existing road system is not fiscally and ecologically sustainable. In fact, the OWNF's TAR identifies about 1,877 miles – or 24% – of its roads that are likely not needed for future use. While ending cross-country motorized travel and completing the travel analysis process is a good start, much work remains to create a sustainable motorized travel system.

We emphasize that the OWNF needs to take actions that will put the forests on a trajectory towards achieving a sustainable roads system.

### *Winter Travel Management*

The Forest Service's new rule governing over-snow vehicle (OSV) use – subpart C of the travel management rule – requires national forests with adequate snowfall to designate and display on an "over-snow vehicle use map" specific areas and routes where OSV use is permitted based on resource protection needs and other recreational uses. OSV use outside the designated system is prohibited. Implemented correctly, the rule presents an important opportunity to enhance quality recreation for both motorized and non-motorized winter users, protect wildlife during the vulnerable winter season, and prevent avoidable damage to vegetation, air, water quality, and other resources – thus, restoring balance to winter in the backcountry.

The OWNF is addressing only wheeled off-road vehicles (pursuant to subpart B of the travel management rule) in the current travel management planning process. We are generally supportive of the forest not overloading the current process with comprehensive winter travel planning, but we are concerned about OSV management and use on the OWNF and want to ensure that the forest is actively working towards compliance with subpart C. We hear regularly from members who experience significant conflict with motorized travel use, especially that of snowmobiling regularly happening in designated wilderness areas.

We encourage the OWNF to initiate a winter planning process very soon to ensure compliance with subpart C of the Travel Management Rule. When making winter designations, the Forest Service must comply with the Executive Orders minimization criteria. The OWNF must not grandfather past decisions that did not properly consider the minimization criteria.

Over 25 years has passed since the Okanogan-Wenatchee National Forest last examined its motorized travel management as part of the 1989 Okanogan National Forest plan revision and the 1990 Wenatchee National Forest plan revision processes (the forests were combined in 2000). Since then, Washington State's population has grown and expectations are that Washington will add over 2 million people by 2040 – many who will want to recreate on the OWNF. Recreational use of the OWNF has also increased and evolved. According to the 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan each year 54 percent of Washingtonians go hiking. The Motorized Travel Management Project's Recreation Specialist Report states that "hiking/walking" is the top land-based activity on the OWNF, followed by "viewing natural features" and "relaxing" with 53 percent of forest visitors engaging in a non-motorized recreational activity. We believe that in addressing the issues we outlined here, the OWNF will be able to make strides in meeting the current and future recreational uses on the Forest.

We urge the OWNF to develop a forest-wide plan that will outline how to educate, enforce and monitor motorized roads and trails to ensure that resources are protected and user conflicts diminished. Furthermore, the forest should take into account how the already overstretched agency will financially cope with future additions to its motorized road and trail system.

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katherine Hollis".

Katherine Hollis  
Conservation and Advocacy Director

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<sup>i</sup> 36 C.F.R. §§ 212.50-212.57 (Subpart B—Designation of Roads, Trails and Areas for Motor Vehicle Use) (commonly referred to as the 2005 Travel Management Rule). Part 212, the Forest Service’s Travel Management rules, also include subpart A, 36 C.F.R. §§ 212.1-212.21 (Administration of the Forest Transportation System), and subpart C, *id.* §§ 212.80-212.81 (Over-snow Vehicle Use).