

# OUTDOOR ALLIANCE



September 28, 2011

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**RE: Comments Regarding Recreation Components of the Proposed Action for the Okanogan-Wenatchee National Forest Plan Revision**

Dear Ms. Hartzell,

Thank you for your hard work on the recently released Proposed Action for the Okanogan-Wenatchee National Forest Plan Revision. As national and major regional organizations, Outdoor Alliance, El Sendero Backcountry Ski and Snowshoe Club, Evergreen Mountain Bike Alliance, The Mountaineers and Washington Trails Association represent the interests of the human powered outdoor recreation community, and we have worked in close partnership with the Pacific Northwest Office of The Wilderness Society on this matter.<sup>1</sup> We are delighted that the Proposed Action acknowledges that providing recreational settings represents an increasingly important value of the Okanogan-Wenatchee National Forest. As America continues to grow, become more urbanized and thus more disconnected from the outdoors, the value of quality user experiences becomes ever more plainly visible.

The Proposed Action takes some important steps towards articulating the need for quality recreational experiences instead of simply defaulting to existing infrastructure, which was largely developed to facilitate resource extraction. We view this as a significant philosophical shift that is profoundly important to our community. This said, the Proposed Action (PA) must take a few more critical steps to ensure a quality recreation experience that is socially sustainable.

The stakes for the Proposed Action are high. Many of our members live in the region because of the world-class, human-powered, recreational opportunities that are available for all of our activities on the Okanogan-Wenatchee National Forest. Active outdoor recreation is a major

driver of Washington State's economy supporting 115,000 jobs, generating \$650 million in annual state tax revenue, and producing \$8.5 billion annually in retail sales and services.<sup>1</sup> We believe great potential exists to manage for sustainable recreation on the Okanogan-Wenatchee National Forest and that doing so will lead to long lasting social, environmental, and economic benefits.

*Setting the Stage for Quality Recreation Experience through a Recreational Resource Inventory Assessment.*

The Proposed Action must have a process to determine where recreational use occurs and must also enable a functional understanding of the site-specific attributes that are important to different activities, such as hiking, paddling, climbing, Nordic skiing, backcountry skiing and mountain biking. This is because recreation, especially human-powered recreation, does not occur randomly or evenly across the National Forest System. Rather, we are drawn to specific places at certain times of the year that offer rare opportunities for high quality recreation. A functional understanding of where our activities occur is essential for the Forest Service to adequately meet its obligations<sup>2</sup> to manage the quality of recreational experiences and better position the Okanogan-Wenatchee National Forest and the communities that surround it to more effectively capitalize on these assets.

The PA cites a number of statistics derived from the National Visitor Use Monitoring survey. While this is a good first step in understanding how people recreate in the forest, NVUM has significant limitations and must be harmonized with other data and actual knowledge of on-the-ground behavior. The cited NVUM data used in this PA are six years old and with a single sample source they do not provide a means of making inferences on recreational trends. The NVUM data make no mention of rock climbing, whitewater paddling or mountain bicycling, all of which are passionately pursued on the Okanogan-Wenatchee National Forest. Because of these limitations, the Forest Service cannot secure quality recreation experiences on the Okanogan-Wenatchee National Forest by relying on NVUM data alone.

In order to collect the recreational resource information necessary to provide for a quality recreational experience, we recommend that the Okanogan-Wenatchee National Forest facilitate a meeting with the undersigned organizations with recreation interests prior to further development of potential alternatives. The purpose of this meeting would be to understand not only where forest users recreate, but also why they recreate in particular locations. The outcome of the meeting would be an inventory of places of recreational significance and key factors for quality recreation of each user group that the Planning Team can use in developing EIS alternatives that would better reflect the needs and use patterns of the human-powered recreation community.

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<sup>1</sup> The Active Outdoor Recreation Economy: A \$730 Billion Contribution to The U.S. Economy: [http://www.outdoorindustry.org/national-economic-impact-reports.php?action=detail&research\\_id=52](http://www.outdoorindustry.org/national-economic-impact-reports.php?action=detail&research_id=52)

<sup>2</sup> In *Meister v. United States Department of Agriculture*, 623 F.3d 363 (6th Cir. Mich., 2010) the court held that the Forest Service was obligated to consider not just the opportunity for recreational experiences, but also the quality of those experiences.

*Securing Quality Recreation Experiences by Using an Expanded Range of Management Designations Informed by the Recreational Resource Inventory.*

The PA identifies two land management designations to provide quality backcountry experiences for the human-powered community. The first type, seasonal backcountry management areas, provides a setting for summertime non-motorized recreation, but not for the wintertime. The second type, Recommended Wilderness Areas (RWA), attempts to provide a setting for wintertime non-motorized recreation. These two management designations may appear to adequately provide the human-powered community with a four-season quality recreational experience. However, these two designations alone will not work to the extent that a given section of the forest is of significant recreational value to *both* the backcountry ski community *and* the mountain bike community. While recommended wilderness assures backcountry skiers will enjoy a quiet and peaceful winter outing, the potential to exclude mountain biking makes this designation problematic. Similarly, the backcountry management designation in the Proposed Action allows mountain biking but fails to assure backcountry and Nordic skiers a quality winter experience by leaving the area open to motorized winter recreation.

Maintaining a broad spectrum of management areas, including a year-round semi-primitive non-motorized backcountry designation is required if the PA hopes to ultimately secure quality recreation experiences for the human-powered community. While the PA now contemplates areas for both primitive experiences (*i.e.* existing and recommended wilderness) and semi-primitive motorized (*i.e.* Backcountry Motorized), no areas for a truly non-motorized semi-primitive experience are provided. This is a major deficiency that can be remedied by including a four-season non-motorized management designation into the portfolio of designations already contemplated in the PA.

The Okanogan-Wenatchee National Forest is a very important forest for our community. It contains superlative backcountry recreation resources that are relatively close to a major regional population center. In addition to serving the residents of the Pacific Northwest, the forest draws visitors from across the nation and from overseas. As noted above, active outdoor recreation is a major driver in the state economy. Having a complete portfolio of management designations is not unlike using a modest tool chest instead of merely relying on a hammer, a saw and a box of nails. For some projects, a tape measure, a level, and an assortment of nuts and bolts can mean the difference between construction and craftsmanship. The Okanogan-Wenatchee National Forest and visitors deserve craftsmanship.

*Growing Opportunities for Quality Recreation Experiences through Increased Acreage of Backcountry Management Areas within the Okanogan-Wenatchee National Forest.*

The human powered recreation community relies on a very diverse landscape to get the most out of their experience, however one common preferred element is the opportunity to recreate separately from motorized users. From a backcountry winter perspective, aside from the obvious snow quality issues, a non-motorized setting greatly enhances visibility, air quality, soundscapes and skier safety. Although mountain bikers frequently ride on trails that are open to motorized vehicles, this is primarily due to a shortage of non-motorized trails open to bicycles. Riding and skiing in areas with motorized access provides a fundamentally lower quality experience for both

mountain bikers and backcountry skiers because there is a loss of the quiet enjoyment of wild places on trails that can be in superior condition due to lower user impact, community maintenance and thoughtful design. Simply put, the PA needs to substantially increase the acreage amounts of Backcountry Management area within the Okanogan-Wenatchee National Forest.

In the PA only 180,000 acres are proposed as Backcountry amounting to only 7.4% of the Wenatchee portion of the Forest. This is one-third less than Backcountry Motorized, which accounts for 11.5% of the Wenatchee portion. When combined with the 686,000 acres of Active Restoration 2 and 3 the total size of the management areas allowing motorized use is 960,000 acres; or 40% of the Wenatchee portion of the Forest. This translates into a five-fold greater acreage for motorized over non-motorized outside of Wilderness; the PA fails to clarify why there should be such a disproportionate amount of motorized use over non-motorized access.

The Backcountry management area should be expanded on the Wenatchee National Forest in recognition of the demand for new opportunities by all forms of human-powered recreation. Examples of areas for evaluation could include sections of Devils Gulch IRA and Entiat-Chelan IRA. Considering that this suggestion will have an impact on the motorized user groups, we recommend that the Forest Service begin a dialogue with all users to identify areas of greatest significance and enact a balanced approach to applying management areas.

#### *Special Interest Areas.*

The concept of Special Interest Areas (SIAs) provides the Okanogan-Wenatchee National Forest with the flexibility to manage special areas unique to the region. Our organizations support the appropriate use of this management allocation on the Okanogan-Wenatchee National Forest. We request that the DEIS be very specific regarding the goals and management direction for identified Special Interest Areas. The Proposed Action contains no information beyond a broad category such as “recreational” and this is insufficient to provide useful feedback on the management that will be encouraged within these areas.

#### *Access Infrastructure.*

Access to the Forests, via road, trails and other recreation infrastructure is essential to the public’s ability to recreate. The reduced access due to increased flooding and fire damage, both to the trail and road system needs to be addressed.<sup>3</sup> The ability for local, regional, and national citizens to gain value from and develop a sense of connection to these national forests depends on their ability to get to the land and experience it first-hand. As such, we recommend that all alternatives of the Forest Plan incorporate increased access aimed at enhancing the quality of

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<sup>3</sup> The Proposed Action discusses this challenge explicitly (p. 20-1). The Regional Wilderness Needs Assessment (Therrell 2009b) also calls out this issue, specifically with regards to the impact of failing roads, trails and bridges resulting in further “concentrate wilderness use into the remaining highly desirable areas” (p. 31-2).

experiences available to a broad spectrum of recreational users. This includes:

- *Increasing day hikes to views* – the Forest Service’s analysis of the recreational needs clearly indicate a lack of supply of day hikes to views compared to the demand (Therrell 2009b; pp. 20, 24,25).
- *Enhancing day use access to rivers* – many of the campgrounds, trailheads, and bridges along rivers provide no contact access to the water. The Proposed Action recognizes this need on the Wenatchee River, Icicle Creek, and Cooper River but several other waterways within the Forest lack day-use facilities.
- *Increasing family friendly recreational opportunities* such as picnic areas, developed campsites and gateway trails – the demographic data on users of the OWNF indicate the need to provide opportunities for an increasingly aging population as well as youth (Therrell 2009a, p. 14) – both of which benefit from day use areas, developed areas and trails that are easier to get to and less strenuous to use.
- *Increasing opportunities for disadvantaged youth* to get to and recreate on the Forest.
- *Increasing the cultural and ethnic diversity* of Forest users.
- *Recognizing priority access trails for rock climbing* (through consultation with the rock climbing community including the Washington Climbers Coalition, The Mountaineers, and the Access Fund).
- *Recognizing priority access for cross-country skiing and snowshoeing* particularly for family and beginner day-use.
- *Continuing to leverage public/private partnership to accomplish priority road and trail maintenance.*

#### *Conclusion.*

Our organizations have a long tradition of working to conserve, protect and enjoy our public lands and waters. A new Okanogan-Wenatchee National Forest Plan offers a significant opportunity to fully recognize the importance of outdoor recreation on this Forest and develop effective management strategies that protect the quality of those experiences. The creation and application of a Backcountry Non-Motorized management area and the expanded use of the existing Backcountry classification beyond those areas in the Proposed Action are critical elements to creating a robust Forest Plan that supports and manages recreation for many years in the future. Thank you for your efforts and please do not hesitate to contact us if we can provide

additional information or support your efforts in caring for the Okanogan-Wenatchee National Forest.<sup>4</sup>

Best regards,

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Wade Blackwood  
*Executive Director, American Canoe Association*

Gregory Miller  
*President, American Hiking Society*

Mark Singleton  
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Michael Van Abel  
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Mark Menlove  
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Winter Wildlands Alliance*

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Gus W. Bekker  
*President/Founder  
El Sendero Backcountry Ski and Snowshoe Club*

Peter Dykstra  
*Regional Director  
Pacific Northwest Region, The Wilderness Society*

cc: Rebecca Heath, *Forest Supervisor, Okanogan-Wenatchee National Forest*  
Kent Connaughton, *Regional Forester, Region 6, Pacific Northwest Region*  
Tom Tidwell, *Chief, USDA Forest Service*  
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Jason Keith, Esq., *Senior Policy Advisor, Access Fund*  
Ashley Korenblat, *PLI Director, International Mountain Bicycling Association*  
Sarah Krueger, *Conservation Manager, The Mountaineers*

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<sup>4</sup> To this end, Sarah Krueger ([sarahk@mountaineers.org](mailto:sarahk@mountaineers.org) / 206/521.6012), Forrest McCarthy ([fmccarthy@winterwildlands.org](mailto:fmccarthy@winterwildlands.org) / 208/386.9227), Thomas O'Keefe ([okeefe@americanwhitewater.org](mailto:okeefe@americanwhitewater.org) / 425/417.9012), Jason Keith ([jason@accessfund.org](mailto:jason@accessfund.org) / 303/325.5936), and Glenn Glover ([glenn@evergreenmtb.org](mailto:glenn@evergreenmtb.org) / 206/524.2900) can serve as primary points of contact for the undersigned on this matter.

Forrest McCarthy, *Public Lands Director, Winter Wildlands Alliance*  
Thomas O'Keefe, PhD., *Pacific Northwest Stewardship Director, American Whitewater*  
R.D. Pascoe, *Policy Director, Access Fund*  
Paul Sanford, *Recreation Director, The Wilderness Society*  
Cynthia Wilkerson, *Washington Program Manager, The Wilderness Society*  
David Zayas, Esq., *Director of Government Relations, American Hiking Society*

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<sup>i</sup> **Outdoor Alliance**, a coalition of six national, member-based organizations includes: Access Fund, American Canoe Association, American Hiking Society, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance, and represents the interests of the millions of Americans who hike, paddle, climb, mountain bike, ski and snowshoe on our nation's public lands, waters and snowscapes. Collectively, OA has members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation.

**The Mountaineers** is a 501(c)3 non-profit whose mission is to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest. The Mountaineers was formed in 1906 to explore the wild areas and peaks surrounding the still-young city of Seattle. Today, it is home to nearly 10,000 active members who enjoy outings and courses for a range of human-powered outdoor recreation activities. To learn more about The Mountaineers, see [mountaineers.org](http://mountaineers.org)

**Evergreen Mountain Bike Alliance** is a 501(c)(3) nonprofit organization whose mission is to create and protect sustainable mountain biking opportunities in Washington State. Founded in 1989 as a grassroots solution to local trail closures, Evergreen has since grown to become Washington's largest mountain bike organization with over 6,000 supporters dedicated to trail maintenance, education, advocacy and trail building. As a trusted partner with public land managers across the state Evergreen's network of crew leaders and volunteers contributes over 7,000 hours of labor each year.

**El Sendero** represents winter backcountry recreationists by advocating for the creation, preservation, and management of non-motorized winter areas on public lands. We work to preserve backcountry areas for quiet human-powered use, promote winter backcountry safety and ethics, and cooperatively resolve conflicts among backcountry users. El Sendero is a non-profit volunteer organization and a grassroots member of the national non-profit Winter Wildlands Alliance. We are backcountry skiers, snowboarders, snowshoers and winter campers.

**Washington Trails Association** has a mission to preserve, enhance, and promote hiking opportunities in Washington state through collaboration, education, advocacy and volunteer trail maintenance.

**The Wilderness Society** works to protect wilderness and inspire Americans to care for wild places. Toward this end, The Wilderness Society works in partnership with local communities, businesses, agencies, conservation organizations, recreationists and local citizens to find solutions for the preservation and stewardship of national public lands. Representing more than 500,000 members and supporters nationwide, including more than 20,000 in Washington State, The Wilderness Society has been involved in land management issues throughout Washington State since 1981.