OUTDOOR ALLIANCE

ACCESS FUND | ACA AMERICAN CANOE ASSOCIATION | AMERICAN WHITEWATER | IMBA INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION | WINTER WILDLANDS ALLIANCE

January 31, 2014

Land Management Plan Revision
U.S. Forest Service
Ecosystem Planning Staff
1323 Club Drive
Vallejo, CA 94592

**RE: Region 5 Early Adopter Forests Preliminary "Need for Change"**

Dear Forest Planning Team,

Outdoor Alliance is a coalition of five national, member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance and represents the interests of the millions of Americans who paddle, climb, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes. This fall, Outdoor Alliance's member organizations and regional partners participated in the Assessment Phases for the Inyo, Sequoia, and Sierra National Forests, and we are pleased to offer these comments on the draft "Need for Change" document.

We recognize and appreciate the Forest Planning Team's efforts in taking on the challenges of acting as early adopter Forests for the new Planning Rule. These challenges are formidable given that the new rule is a sea change in how we manage our national forests, and more so considering the absence of finalized planning directives. We applaud, in particular, the exemplary public participation process employed in developing the Forests' Assessment Reports and the thoughtful incorporation of Assessment content from the outdoor recreation community. These steps will result in a strong final product for the Sierra, Sequoia, and Inyo Forests.

We are pleased, as well, to see the inclusion of sustainable recreation in the Need for Change document and the statement in the Bio-Regional Assessment[1] that planners will evaluate sustainable recreation in accordance with the principles laid out in "Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation" and its aim of "Renewing Body and Spirit, Inspiring Passion for the Land." We wholeheartedly agree with that document's statement that:

> **[R]ecreation is the portal** for understanding and caring for natural resources and public lands. It provides opportunities and motivation to advance from fun and attraction, through awareness, education and understanding, to a role of citizen

[1] FINAL SIERRA-NEVADA BIO-REGIONAL ASSESSMENT REPORT 53 (2014).

> stewardship—one of "giving back" and supporting sustained management of natural resources.[2]

(Emphasis in original). We believe that a focus on sustainable recreation will in turn help to facilitate all other aspects of the planning process.

While we are heartened by the Planning Team's tremendous public outreach efforts, recognition of the important contributions of outdoor recreation to participants' health and well-being, and inclusion of an emphasis area on sustainable recreation in the Need for Change document, we are concerned by some statements in the Need for Change regarding the future of dispersed recreation opportunities in the Forests. In particular, we note the document's suggestions that "Unmanaged recreation can negatively impact ecosystem health," and that "Current forest plans encourage dispersed recreation use over developed recreation impacting ecological sustainability and caus[ing] user group conflicts."[3] While it is unclear to us exactly what changes these statements may imply, dispersed recreation is deeply important our community. We look forward to working with the Forest Service to reduce impacts or conflict so that developed recreation opportunities can complement the suite of dispersed recreation experiences that define the Inyo, Sequoia, and Sierra National Forests.

As illustrated in the comments that follow, outdoor recreationists develop strong affinities for highly particular places and experiences, and those experiences may not be possible at developed recreation sites, or even at alternative undeveloped sites. For much of the outdoor recreation community, "dispersed" does not signify "undifferentiated." Moving forward, Outdoor Alliance is committed to being strong partners with the Forest Service in stewardship of the Forests' landscape, and we are reassured by the knowledge that management decisions will be based on the best available scientific information as mandated by the Planning Rule.

Given that the new Planning Rule presents a fundamental shift in the nature of Forests management, it is unsurprising that adapting older tools to address these changes is challenging. In order to fulfill the promise of the 2012 Planning Rule and the sustainability framework of America's Great Outdoors, we make the following suggestions for implementation of the Need for Change document:

- Develop a more specific inventory of significant recreation assets than is produced in the Bio-Regional Assessment or the Forests' respective Assessments in order to facilitate efficient allocation of resources and ensure the sustainability of dispersed recreation.

- Supplement National Visitor Use Monitoring (NVUM) data with more specific data where available, and recognize the limits in NVUM's methodology so that data gaps can be addressed through the planning and monitoring phases.

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[2] U.S. FOREST SERVICE, USDA RECREATION, HERITAGE AND VOLUNTEER RESOURCES, CONNECTING PEOPLE WITH AMERICA'S GREAT OUTDOORS: A FRAMEWORK FOR SUSTAINABLE RECREATION 3 (2010).
[3] PRELIMINARY NEED FOR CHANGE: FOREST PLAN REVISIONS, REGION 5 EARLY ADOPTER FORESTS 7 (2014).

- Use the Recreational Opportunity Spectrum (ROS) methodology in conjunction with more place-specific information in order to keep the overall recreational experience at the center of consideration.

- Expand consideration of the economics of outdoor recreation beyond the impacts of tourist spending to include a variety of more modern study methodologies.

We recognize that these comments may extend beyond the scope of the Need for Change, but we believe that they raise important issues that we hope the Planning Team will address in moving forward with the planning process. Additionally, we have attached the comments of our member organizations from the Assessment process, and we hope that they will be of continued utility in providing greater geographic and activity-specific context to the comments that follow. The remainder of these comments take a deeper dive on how the recommendations outlined above can improve the Need for Change document and the balance of the planning process for the Inyo, Sequoia, and Sierra National Forests.

1. *Responding to the need for efficient allocation of maintenance and operation resources may require a more specific inventory of recreational assets than is produced in the Assessment Reports.*

As noted in the Need for Change paper under the heading "Threats to losing benefits," declining budgets are limiting the agency's ability to respond to current recreation demand and operate and maintain facilities. Responding to this challenge successfully will largely depend on a careful inventory of the places of recreational significance in order to efficiently allocate resources, and the current level of specificity produced in the Bio-Regional Assessment and the Forests' respective Assessment Reports may be inadequate to this task. Planners should strive to document river sections, climbing areas, significant backcountry winter recreation areas, mountain biking trails, and affiliated access infrastructure such as trailheads, river access points, and camping opportunities with the highest possible level of specificity, map recreational features to the greatest extent possible, and, at minimum employ mapping data provided by recreational users and groups.

Among the existing public data sources that could assist Forest Planners in developing a specific inventory of recreational resources are:

- American Whitewater's inventory of California river sections (including a Google Earth mapping layer);[4]
- Mountain Project's California climbing page;[5]
- MTB Project's California mountain biking page.[6]
- Winter Wildlands Alliance's Inyo Assessment comments[7]

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[4] AMERICAN WHITEWATER, CA STATE RIVERS, http://www.americanwhitewater.org/content/River/state-summary/state/CA/. Another important resource for California whitewater information is Lars Holbek & Chuck Stanley, *The Best Whitewater in California: The Guide to 180 Runs* (2d ed. 1998).

[5] MOUNTAIN PROJECT, CALIFORNIA, http://www.mountainproject.com/v/california/105708959.

[6] MTB PROJECT, MOUNTAIN BIKE TRAILS NEAR CALIFORNIA, http://www.mtbproject.com/directory/166215/california.

These sources provide exceedingly high quality, user-generated descriptions of many of the outdoor recreational resources found in the Inyo, Sequoia, and Sierra National Forests. Trail descriptions on MTB Project, for example, contain user-generated mapping data, information on ascents and descents, and qualitative descriptions that yield insights into the trail characteristics valued by the user community. American Whitewater's database provides Google Earth data for put-ins and take-outs and valuable information about the water levels preferred by whitewater paddlers, in addition to qualitative descriptions and photos of river segments. Mountain Project provides climbing descriptions for routes all over the Sierra Nevada (among other areas), including qualitative descriptions, information on seasonal closures, and a breakdown of routes by difficulty, type, and qualitative rating, providing useful insights into the values of the user community. A more thorough integration of these resources into the Assessment Report (or their consideration in some other fashion) will help meet the Need for Change document's goal of efficiently responding to resource scarcity.

Describing recreational resources with a high level of specificity is important, as well, because of the strong connection with specific places formed by outdoor recreationists, particularly with regard to the type of premier resources found in the Inyo, Sequoia, and Sierra National Forests. As documented in greater detail in enclosed and prior letters from our member organizations, these Forests contain deeply treasured places for climbers, mountain bikers, kayakers, and skiers and snowshoers. These activities do not occur at random throughout the Forests; rather, they occur at highly specific locations to which visitors travel for hundreds or thousands of miles.

2. *NVUM data is unlikely to accurately reflect recreational use and should be supplemented with other sources.*

Just as a high degree of geographic specificity is required in the documentation of recreational resources, efficient allocation of resources requires careful documentation of levels and patterns of use in a more specific and accurate fashion than is possible through the National Visitor Use Monitoring program. Outdoor Alliance believes that the NVUM program has only limited utility because of its dated methodology, and an over reliance on NVUM data without supplementation from other sources is unlikely to meet the Planning Rule's mandate of employing the best available science and existing sources of data.

NVUM survey sites are selected "using a stratified random sample of the times and locations where recreational visitors can be counted." However, the places that people choose to recreate, particularly for activities like climbing, kayaking, mountain biking, and skiing and snowshoeing are not distributed across Forest Service sites such that a random sampling is likely to capture them. Outdoor recreationists seek out particular experiences that can only be found in specific locations, and without weighting the site selection process to ensure that these favorite locations are included, the sample will result in an under-representation of these activities.

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[7] Comments dated December 16, 2013, and attached. *See also* PAUL RICHINS, JR., 50 CLASSIC BACKCOUNTRY SKI AND SNOWBOARD SUMMITS IN CALIFORNIA (2010); DAN MINGORI AND NATE GREENBERG, BACKCOUNTRY SKIING CALIFORNIA'S EASTERN SIERRA: 166 SKI AND SNOWBOARD DESCENTS IN THE RANGE OF LIGHT BETWEEN TIOGA PASS AND BISHOP CREEK (2008).

Additionally, data sampling at NVUM sites occurs on randomly selected days without adequately taking into account the variables that make any particular day optimal for a particular activity. NVUM sampling is unlikely to produce accurate data on many types of recreational use because it fails to account for variables like whether a river is at the appropriate water level for paddling or whether a trail is too muddy to ride. Many higher elevation whitewater runs, for example, may only be at appropriate levels for river running for as little as a few days during each season's runoff, but nevertheless offer highly prized experiences for whitewater kayakers for which boaters literally travel from all over the world.

In order to account for these deficiencies in NVUM data, the Assessment Reports should be supplemented with information from the experience of local land managers and participation studies such as those published by the Outdoor Industry Association, which include detailed information on participation, the demographics of outdoor recreation, and substantially more detailed consideration of the various forms of each outdoor recreation activity than is provided by NVUM.[8] While these surveys cannot provide improved geographic granularity in comparison with NVUM, they do provide an incremental improvement by offering greater specificity on the varieties of outdoor recreation activity. Planners should also continue to actively engage the recreation community in developing this data, and Outdoor Alliance is prepared to assist in this effort. Finally, planners should specifically note the limited nature of existing use data so that these needs can be addressed in the planning and monitoring phases.

3. *Over-reliance on the Recreational Opportunity Spectrum undercuts the importance to people of specific places.*

As alluded to in *Part 1* above, members of the human-powered outdoor recreation community seek out highly specific experiences at highly particularized locations on the landscape. We believe that planners should incorporate this insight into the "Importance to People" subhead of the Need for Change document's Sustainable Recreation section, and, additionally, recognize that responding to this exceedingly important characteristic of recreational use on the Forest landscape requires a reconsideration of the way planners employ the Recreational Opportunity Spectrum. Ultimately, the ROS is a useful shorthand for the level of development in an area, but it must not become a tool for treating unique places merely as components of monolithic blocks.

Overall, the level of development as described by the ROS is an important attribute of a recreational setting, but that attribute alone does not define it, and ROS data needs to be considered in the context of the overall recreational experience. Too frequently, the Assessment Reports read as though the Forest Service hopes to respond to hypothetical demand in a way that is not sufficiently connected to the landscape, and this problem is exacerbated by an over-reliance on the ROS.

The Bio-Regional Assessment, for example, notes that "Each national forest aims to provide a set of outdoor recreation activities consistent with the forest niche and the ROS class in which the activities are located."[9] The Forest Service clearly cannot offer recreation activities based on

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[8] OUTDOOR FOUNDATION, OUTDOOR PARTICIPATION REPORT 2013, *available at* http://www.outdoorindustry.org/images/researchfiles/ParticipationStudy2013.pdf?193.

[9] FINAL SIERRA-NEVADA BIO-REGIONAL ASSESSMENT REPORT 60 (2014).

these considerations alone, however, since it is the landscape itself that provides the topography and the climate that make a given activity possible and a particular experience unique. The Forest Service cannot respond to the preferences of climbers by creating vertical rock where there is none or the desires of skiers by making it snow—it is the landscape that provides the setting, and management has to respond to that demand in the sense of appropriately managing existing resources. From the perspectives of recreationists seeking whitewater, rock, biking trails, or snow-filled couloirs, the ROS describes an important attribute of an area, but not necessarily its defining one.

While most active outdoor recreational users prefer sites in the most pristine possible condition and would not like to see areas degraded by increased development, the level of development as described by the ROS is only one factor in the decision making process of where a would-be user goes on any given day. A highly specific inventory of recreational resources, including a description of where each trail system, river segment, climbing area, or snowscape fits into the ROS could yield important insights into how levels of development affect recreational use as well as give a fuller picture of the traits that make recreational resources and experiences desirable.

While the ROS provides valuable insights into the availability of recreational experiences in the National Forests, its use should also not preclude recognizing that high quality recreational assets occur across the ROS, and that the degree of development in an area is not necessarily the driving factor in recreational use decisions. By better understanding the highly specific experiences sought by recreational users, and, most importantly, the connections between those experiences and the landscape, the Forest Service will be better prepared to protect treasured recreational resources, efficiently allocate resources, and ensure that recreation occurs in the sustainable fashion mandated by the planning rule.

4. *The Need for Change should reflect that the economic contribution of outdoor recreation to local economies extends well beyond the effects of tourist spending.*

The Need for Change aptly notes that, "The economic vitality and quality of life of local communities is threatened by degraded scenic character and loss of recreation opportunities," and that, "Visitors to the national forest support the tourism industry that contributes to the economic vigor of local businesses and stimulates local employment."[10] The Need for Change should also reflect that the economic contributions of outdoor recreation to local communities extend well beyond the effects of visitor spending, including allowing communities to attract high-skill employees and businesses as a result of amenity-based migration.

A large body of research exists documenting the role of outdoor recreation opportunities in attracting businesses and workers[11] and the relationship between protected public lands and

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[10] PRELIMINARY NEED FOR CHANGE: FOREST PLAN REVISIONS, REGION 5 EARLY ADOPTER FORESTS 7 (2014).

[11] *See, e.g.*, SONORAN INSTITUTE, THE CAPITALIZATION OF OUR CLIMATE: ATTRACTING HIGHLY SKILLED WORKERS TO ARIZONA'S SUN CORRIDOR (2013), *available at* http://www.sonoraninstitute.org/component/docman/doc_download/1544-the-capitalization-of-our-climate-attracting-highly-skilled-workers-to-arizonas-sun-corridor-09172013.html.

economic growth.[12] The Sierra Nevada area is a draw for outdoor recreation equipment manufacturers from Praxis Skis to Patagonia—in addition to guiding and tourist based businesses—and the Need for Change should reflect the role of the National Forests and their recreational amenities in attracting these employers, as well as other measurements of economic activity beyond tourist spending.

In addition to economic impact analyses (EIAs), a common method for evaluating the effect of tourist spending on a local economy, economists have a broad range of tools that can help to illuminate the economic work being performed by outdoor recreation and the protected public lands where it often occurs. As noted above, an array of studies persuasively document the connection between protected public lands and economic growth, as well as the ability of protected lands to attract high-skill workers and industries. Other valuation techniques include hedonic property value analysis, a method of breaking down the components of housing price data to ascertain the role of an attribute, such as proximity to a National Forest or other recreational amenity, in the overall price of housing, thereby revealing willingness to pay for proximity to the resource; the travel-cost method, a means of constructing a demand curve for willingness to pay for a visitor day at a recreational amenity; and contingent valuation, a technique for eliciting an individual's willingness to pay for a resource or experience. These techniques help to flesh out a fuller picture of the economic work being performed by the outdoor recreation opportunities offered in the National Forests, and these types of studies should be considered alongside visitor-spending based measurements such as EIAs whenever possible.

*5. Conclusion*

Outdoor Alliance deeply appreciates the efforts of the Forest Planning Team in acting as early adopters of the new Planning Rule and engaging in this process without the benefit of directives from the Forest Service. We particularly appreciate the Team's exemplary efforts at public engagement and its recognition of the important role of outdoor recreation in the lives of individuals and communities. We appreciate the challenges inherent in trying to adopt old tools, which may not be well suited to the task at hand, to the tasks of a more modern planning rule, and we look forward to serving as a resource for planners in moving forward.

Best regards,

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CC:
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Michael Van Abel, *Executive Director, International Mountain Bicycling Association*
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[12] *See, e.g.*, HEADWATERS ECONOMICS, THE VALUE OF PROTECTED LANDS, http://headwaterseconomics.org/land/reports/protected-lands-value.