

February 2, 2018

Chief Tony Tooke
United States Forest Service
1400 Independence Ave, SW
Washington, DC 20250

Re: Advance notice of proposed rulemaking, National Environmental Policy Act compliance (83 Fed. Reg. 302, Jan. 3, 2018)

Dear Chief Tooke:

The Mountaineers appreciates the opportunity to submit comments on the United States Forest Service (USFS) Advanced Notice of Proposed Rulemaking on National Environmental Policy Act (NEPA) compliance, published at 83 FR 302 (January 3, 2018).

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 the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 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 and protects the outdoor experience for current and future generations.

We believe that NEPA is critically important to the management of our public lands. NEPA was designed to shine light on government decision-making processes and ensures that agencies make informed land management decisions. It creates integral opportunities for the recreating public to engage in the management of our public lands, and this involvement is integral to agencies’ decision-making.

NEPA is also a vital tool as it helps ensure that public lands and waters remain healthy and resilient. It helps protect the landscapes where the outdoor community recreates. Using sound science to reduce and mitigate harmful environmental impacts, it puts the environment on equal footing with economics and other factors that shape land management decisions and practices. This cannot be overstated and must remain the bedrock upon which any changes to how the USFS approaches compliance with NEPA.

As the agency considers a proposed rule on NEPA compliance, and we urge the USFS preserve the letter and spirit of NEPA, we also believe that NEPA compliance procedures for facilitated access (outfitter-guide permitting) can be carefully recalibrated.

Access to our public lands through facilitated experiences, whether with a guide, outfitter, university program, nonprofit outdoor education organization, or volunteer-based club is an important way for the general public to experience our public lands safely and responsibly. We believe opportunity exists for the agency to improve the environmental review process as it relates to issuing outfitter-guide permits. The environmental analysis requirements that are currently being applied to outfitter-guide proposals are complex. Their cost prevents USFS from authorizing new recreation activities; reauthorizing some existing activities, and thus creates barriers for people to visit our National Forests.

These analysis requirements are also inequitable. Categorical exclusions that the agency has historically used for outfitter-guide permitting are narrow and allow the agency to authorize guiding and outfitting activities in relatively few circumstances. While existing categorical exclusions currently allow it to authorize activities that have noticeably larger impacts on the land than facilitated recreation.

We encourage the agency to carefully explore a recalibration of its NEPA compliance procedures for facilitated access. We believe it is possible to preserve the letter and spirit of NEPA while at the same time simplifying the process for issuing outfitter-guide permits, and thus allowing for more members of the public to experience our National Forest safely and responsibly.

Sincerely,

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

Katherine Hollis
Conservation and Advocacy Director,
The Mountaineers