2/26/13

Response to FRN 0596-0110 comments from WA Recreation Organizations:

This letter comes from a set of recreation interest groups, and presents several concerns with the NVUM program and method. Concerns are expressed within the context of the Okanogan-Wenatchee Forest Plan Revision. The concerns will be restated and discussed below.

1. <u>Random sampling underreports human-powered activities</u>. The groups state they feel that 'the random selection of sites and days on which surveys are conducted leads to the underreporting of certain types of human-powered recreation'. They note differences between the NVUM estimates of snowmobiling and skiing, compared to the Washington 2012 Statewide Comprehensive Outdoor Recreation Program (SCORP).

It is not the case that a random sample necessarily underrepresents any particular group of users. The NVUM sample of locations and days is actually a stratified random sample where the strata are defined by types of sites and expected exiting volumes of visitation. The exiting volumes are provided by forest staff who are knowledgeable about overall visitation patterns to the forests. For the set of activities the groups are concerned with, the sampling locations are typically at entry/exit portals to the undeveloped portion of forest. Most often these portals are where visitors to could be exiting the forest on roads and trails. As such, the portals include a wide array of activity participants, and all of these users are potentially included in the sample. In order to ensure that a representative sample of visitors is obtained, the algorithm used to select the field schedule distributes sample locations for each stratum across seasons and areas of the forest in approximately the same proportion as the population of location/day combinations to be sampled. It may be that a larger sample size would alleviate the concerns the groups have with the sampling approach. It is not clear what recommendations the groups would want to make to improve the NVUM process.

Comparisons with the Washington SCORP results may be problematic. The recreation metric (% state households reporting participation) is not directly comparable to that in NVUM. Moreover, without understanding the methodology or approach for that study, it is very difficult to judge whether the SCORP results are either more or less valid or reliable than those from NVUM.

2. <u>NVUM Methodology does not accurately describe visitor activities</u>. This concern centers on the list of activities that the NVUM program uses. One issue is that some activities on the list are somewhat general while others are more specific; another is that the list does not include a wide enough array of activities.

The activity list in the current collection was developed in consultation with forest managers, researchers, and other Federal agencies engaged in similar monitoring. For purposes of national and regional aggregation, it is desirable to have one activity list that is applied nationally. The activity list is

reviewed prior to the beginning of each NVUM national cycle to evaluate whether some changes are needed to adjust the list used for that 5-year cycle. The next national cycle begins in FY2015. Comments from the groups about tracking human-powered recreation, including climbing, will be given consideration in the review. Unfortunately, simply adding activities to the list may not be practical.

3. <u>Ensuring NVUM data are used properly</u>. The groups express concern that land managers are 'improperly relying on NVUM data in planning documents'.

This is not an issue with the NVUM method, but rather with how field units choose to employ the results. However, agency guidance does recommend use of both NVUM results as well as results from other sources, such as SCORP documents, in recreation planning.