



# Travel Management

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## **Eligible Objectors & Interested Persons for this issue:**

- WildEarth Guardians
- Merrill Ott
- Washington Cattleman's Association
- Sierra Club/Alliance for the Wild Rockies
- Stevens County Commissioners
- American Forest Resource Council
- Pend Oreille County Commissioners

## **Objections:**

- The Forest Service is attempting to make motorized use designations in the revised Land Management Plan (LMP).
- The revised LMP fails to prioritize unneeded roads for decommissioning (opposite view expressed by another objector).
- The Forest Service fails to clearly articulate its proposed action regarding winter motorized recreation. Reference to routes and designated areas implies the Recreation Opportunity Spectrum settings designate routes and areas for winter motorized use, which does not follow the Travel Management Rule.
- Amendment #31 to the 1988 Colville LMP did not establish compliance with Subpart B of the Travel Management Rule because it did not analyze whether the motorized designations it authorized complied with the Executive Order and Travel Management Rule minimization criteria. Any route or area designations that are new or different from what is identified in Amendment 31 to the 1988 Colville Forest Plan must demonstrate compliance with the minimization criteria, including winter motorized use designations.
- Although the final Environmental Impact Statement (FEIS) states, "Decisions on road decommissioning would be made at the project level based on information provided by resource specialists and recommendations contained in the Forest's most recent Travel Analysis Report pursuant to subpart A of the 2005 Travel Management Rule." Recent project analysis demonstrates the Forest Service's refusal to be guided by its forest-wide Travel Analysis Report.
- The Forest Service fails to take seriously its responsibilities under the Travel Management Regulations at 36 CFR § 2125, Subpart A. The revised LMP contains no Plan Components that require a significant reduction in the forest road system or identification and implementation of the Minimum Road System, and takes no explicit direction from the Travel Management Regulations at 36 CFR § 212.5, Subpart A. The FEIS and revised LMP therefore violate the Travel Management Regulations.
- By sanctioning current routes without properly applying the Executive Order minimization criteria, the Forest Service has acted in a manner that abuses its discretion and is arbitrary and capricious.
- The FEIS fails to closely consider impacts from off-road vehicle trails and areas. Those impacts will significantly affect the quality of the human environment.



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- Objectors contend there is no strategy to fund and ensure effective law enforcement to address illegal motorized use.

## **Resolution Options Proposed by Objectors:**

- Revise the road-related plan components to comply with the 1982 planning regulation requirements by providing necessary resource protection from roads, modifying objectives to be consistent with the purpose of an objective and to achieve desired conditions. [WildEarth Guardians]
- There is a forest-wide wildlife standard for road density, FW-STD-WL-07. But this standard only prohibits a net reduction of grizzly bear core habitat below levels in Table 15; it does not apply to the Colville National Forest as a whole and it creates a major exception for "physically undrivable roads." Recommend the standards and guidelines be revised to include road density standards that apply to the Colville National Forest road system as a whole (not just within grizzly core habitat). [WildEarth Guardians]
- Revise the road-related plan components to work towards a realistic desired road system that is economically and environmentally sustainable and can be managed along with plan components for ecological sustainability. Include plan components for achieving an ecologically and fiscally sustainable minimum road system, as required under the 2012 Planning Rule and subpart A of the Forest Service's travel rules, 36 C.F.R. part 212. [WildEarth Guardians]
- Clarify in the final Record of Decision (ROD) forest-wide, site-specific winter travel planning is required to designate Over-Snow Vehicle (OSV) routes and discrete areas. Revise the final ROD and sustainable recreation Plan Components to commit to site-specific winter travel planning within areas deemed suitable for OSV use within one year of completion of the revised LMP. [WildEarth Guardians]
- We suggest a rewording of MA-DC -FR-05 and MA-STD-FR-01 (p.107) of the LMP to (1) reflect the stated management emphasis of landscape level ecological function (p106) and (2) drop all references to an arbitrary statistic. The statement regarding General Restoration MA-DC-GR- OS can appear contradictory when read and confusion could spawn litigation. [Stevens County Commissioners]
- The Forest must drop the arbitrary and unachievable goal of no more than two miles of National Forest System road per square mile within the General Restoration Management area and no more than one mile of road per section for Focused Restoration Management areas. These numbers could place restrictions on the construction of new roads for needed access and could force the Forest to close needed roads for fire access, recreation, and forest product removal. AFRC further believes this standard will leave the Forest open to litigation. [American Forest Resource Council]