

Roadless Issues

Sierra Club/Alliance for the Wild Rockies
Washington Chapter, Backcountry Hunters and Anglers

Objectors contend the revised plan merely restates the Roadless Conservation Area Rule which accomplishes nothing, therefore the guidelines are unnecessary. Objectors believes in accordance with Chapter 70, Forest Service directives, the revision should include areas that may not have been included within past or current roadless inventories, and those areas should be included in recommended Wilderness. Objectors would like direction that roadless areas be managed to maintain their exceptional wilderness characters.

Response:

Objector is correct, presenting a regulation as a guideline can appear to soften the force of the regulation. Suggested remedy, remove as a guideline and restate the same regulation material in the introductions to these two sections. [Note this would also allow an administrative change if roadless rule was to change].

Colville plan revision was initiated prior to 2015 directives and can be exempted from new chapter 70 direction. However, the Colville needs to provide some documentation and rationale for the use of the 2007 directive. The elements of this rationale are:

1. Use of the 2015 directive would have disrupted the work that was underway on wilderness inventory and evaluation per FSM 1920.3 (9)(b). Documentation regarding transition in the use of directives is required. Colville can summarize their wilderness inventory and evaluation work in terms of the timing of their work relative to the final directives.
2. The 1982 rule at 219.17 and more specifically at 219.17(b) has specific requirements for wilderness inventory and evaluation that are not present in the 2012 planning rule. Compliance with these requirements necessitated use of 2007 chapter 70 since these requirements are not addressed in the 2015 chapter 70.

There is no obligation for Roadless Areas covered by Roadless Rule to be managed to maintain exceptional wilderness characteristics, only to comply with the rule.

Remedy:

We support the fact all motorized activity is deemed not suitable in recommended wilderness. However, that should extend to all Inventoried Roadless Areas (Sierra Club).

This is not required by Roadless Rule and is at the discretion of the Responsible Official to determine area by area.

Conclusion:

A change in the presentation of the roadless rule is desirable. Suggested remedy, remove as a guideline and restate the same regulation material in the introductions to these two sections. [Note this would also allow an administrative change if roadless rule was to change].

Added documentation on the rationale for use of the 2007 Chapter 70 directive is needed. This could be in EIS appendix on wilderness inventory and evaluation, ROD or planning record.