

Special Areas

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Sierra Club/Alliance for the Wild Rockies
Northeast Washington Forest Coalition

Objectors contend:

- **Management of Research Natural Areas (RNAs) as de facto wilderness prevents the development of existing Teck mining claims in the Halliday Fen Research Natural Area.**
- **It is not appropriate to designate areas of active mining claims as Research Natural Areas because these areas are already altered by human activities.**
- **The Kettle Crest Recreation Area designation basically cements into the LMP existing motorized uses incompatible with wilderness character.**
- **The Forest Service's land management plan fails to provide the recreation opportunity spectrum (ROS) settings necessary to provide quality recreation opportunities, and recreation opportunities on the National Forest System lands.**
- **The proposed Kettle Crest Recreation Area would significantly degrade wildlife habitat, prevent the area's ability to support sensitive wildlife, and degrade wilderness characteristics. We strongly disagree with locating a Recreation Area (KCRA) overlying Profanity, Twin Sisters and Hoodoo PWAs. Forest Summit participants did not endorse a SIA designation for the Kettle Crest area.**

Response:

The FEIS (Vol 3, p. 1484) shows the Halliday Fen RNA includes 646.4 acres withdrawn from mineral entry. This means this RNA is no longer open to mineral entry under the 1872 mining law. This RNA was established in 1999. The RNA was withdrawn from mineral entry in September 2004. This withdrawal expires in 20 years. At the time of the withdrawal there were mining claims within the boundaries of the RNA. To date no mining proposals have been filed within the RNA. The filing of a proposed mining plan of operations would have triggered a valid and existing rights determination. The RNA would not prevent the development of existing mining claims within the Halliday Fen RNA, but approval of development would be subject to valid existing rights.

The existing motorized routes in the Kettle Crest Area (as with all existing travel routes across the plan area) are not "cemented" by decisions made in the proposed Forest Plan. Decisions related to and guiding future travel management decisions are the desired ROS allocations and other relevant plan components apply either forest wide or to discrete landscapes. Specific route decommissioning, closures, or additions are done at the project level to achieve, maintain, or move toward desired ROS settings and other relevant plan components, including those addressing other resource values (e.g. wildlife, watershed, etc.).

This is addressed in the FEIS, Vol. 3, page 1008:

Site-specific planning would analyze the effects that specific recreation and trail proposals have on users, as well as the effects of those proposals on other resources such as wildlife and water quality. Changes to specific types of recreation opportunities, including dispersed camping and the addition/subtraction of specific trail routes, are not a forest plan decision, but an outcome of a site-specific analysis process. Where appropriate, recreation opportunities will be maintained if they are suitable for the management area (see Table 239 in FEIS chapter 3), and may be expanded under the proposed revised forest plan after site-specific analysis is completed and public input has been considered.

Although initially assessed as a Potential Wilderness Area (PWA), the Kettle Crest Area is not recommended for Wilderness designation in the proposed plan. Instead future projects and management activities will be guided by relevant plan components (Forest-wide, management area specific, and ROS class related), This is true, not only for the Kettle Crest Recreation Area, but for the entire plan area.

Suitability for motorized use varies within other management areas depending on the type of recreation emphasized (based on the recreation opportunity spectrum), or with wildlife habitat emphasis.(FEIS, Vol. 1, page 35-36)

Table 7 (Vol. 1, page 28-43) of the FEIS provides an overview of all proposed management areas and their application across alternatives. Maps of the alternatives are provided in the supplement folder and on the website.

Table 21 (Vol. 1, page 72-75) of the FEIS compares the suitability of each management area for major types of uses across the alternatives.

Table 22 (Vol. 1, page 76) of the FEIS – Compares key indicators and a summary of effects by revision topic. Included is the differences in percent of forest where motorized vehicle use is allowed and whether Kettle Crest is proposed for special area designation.

The FEIS, Vol. 3, Response to Comments (Appendix page 1020) states:

The term “special interest area” has been removed from the FEIS and proposed revised forest plan. In the proposed revised forest plan, the Kettle Crest Recreation Area (KRCA) represents a special type of management area that overlays both forest-wide and management area (i.e. Backcountry, Backcountry Motorized, Scenic Byway, National Scenic Trail, Focused Restoration, and General Restoration) specific direction. For example, motorized recreation could occur in the Scenic Byway, Backcountry Motorized, Focused and General Restoration Management Areas, but could not occur in the Backcountry Management Areas (Profanity, Bald-Snow, and Hoodoo Inventoried Roadless Areas) or National Scenic Trail Corridor associated with the Recreation Area. A list displaying the types of activities that may or may not be suitable in each management area is contained in the proposed revised forest plan.

In addition, the KRCA incorporates the management direction contained in the forest-wide management direction to protect vegetation and other natural resources (air, soil, vegetation, water resources, and wildlife habitats) as well as the social systems that exist (grazing, heritage resources, recreation, minerals, special uses, etc.) within the KRCA. If a conflict in management direction is identified between the KRCA specific management direction and the underlying management area direction, the KRCA specific management direction would apply, except for conflicts with the Nationally Designated Trails MA. Because the National Scenic Trail was designated by Congress and will be supported by a congressionally mandated comprehensive plan, the National Scenic Trail management direction would take precedence over the KRCA management direction. The FEIS displays the effects of the KRCA management direction on natural resources and social systems for each alternative.

The proposed plan uses the Recreation Opportunity Spectrum (ROS) to allocate a range of recreation settings and opportunities across the unit. Settings range from those that are developed (Rural and road natural), to those that are primitive. Recreational settings and natural resource-based recreational activities are managed to meet the recreation opportunity spectrum (ROS) classifications identified on the ROS map in appendix F.

The FEIS (Vol. 3, page 1007-1008) addresses desired ROS settings and associated suitability as programmatic decisions.

The proposed revised forest plan provides programmatic direction as to where recreation opportunities may or may not be suitable. During the planning process, the need to provide a range of recreational opportunities while considering many other resource management needs, user safety, and budget limitations were considered. The desired range of recreation opportunities on the Forest includes a variety of motorized and non-motorized recreation opportunities during the summer and winter that provide a range of difficulty and seclusion levels, are located in diverse ecological, geological, and scenic settings, minimizes user conflicts, provides destination and loop opportunities (FW-DC-AS-02, FW-OBJ-AS-01, FW-GDL-AS-05, MA-OBJ-KCRA-02) of various lengths that connect communities, trail systems, and popular dispersed camping areas, while protecting the natural and cultural resources of the Forest (FW-DC-AS-02. Trail System – Motorized and Non-Motorized).

The FEIS provides an analysis and comparison of recreation opportunities between the various action alternatives and explains the integration with other resource areas. For example, alternative O provides the greatest opportunity to increase motorized and mechanized recreation by limiting the number of acres of recommended wilderness and maximizing both backcountry and backcountry motorized management area acres. Conversely, alternatives R and B both minimize motorized and mechanized recreation opportunities by maximizing the number of acres of recommended wilderness while minimizing both backcountry and backcountry motorized management area acres. The proposed action and the preferred alternative (alternative P) both strive to balance the various demands for outdoor recreation, including motorized and mechanized recreation, by providing additional backcountry (mountain bike trail opportunities), backcountry motorized (motorized trail opportunities), and recommended wilderness acres when compared to the existing condition.

The FEIS (Vol. 3, page 1023) also discusses Recommended Wilderness and the ROS decisions made within the Kettle Creek Recreation Area:

Alternative P was designed to maintain a balance of motorized, mechanized, and non-motorized/non-mechanized recreation opportunities. As a result, Abercrombie-Hooknose and Bald-Snow IRAs will be managed as Recommended Wilderness, while Profanity, Hoodoo, and part of the Bald-Snow IRA north of Snow Peak Cabin will be managed a Backcountry (allowing mountain biking) and Twin Sisters will be managed as Backcountry Motorized. For all alternatives, the effects to wildlife habitat have been analyzed and displayed in the FEIS. The analysis in the Recreation Specialist Report and the FEIS has been updated for each alternative to clarify effects on the remote characteristics (i.e. solitude) of each inventoried roadless area as a result of the Recreation Area designation along the Kettle Crest and the presence of motorized use in the Twin Sisters IRA.

Draft ROD discusses the decision to create the Kettle Crest Recreation Area:

My decision will create the Kettle Crest Recreation Area (approximately 80,300 acres). The Forest received many comments specific to the Kettle Crest and the importance of this area for its recreational, scenic, and spiritual value. This management area will emphasize and protect outstanding recreation opportunities in a semi-primitive setting while allowing continued motorized and mechanized recreation. Some commenters expressed their interest in seeing this area as recommended wilderness (as reflected in alternatives B and R). However, due to the variety of existing recreational uses and public interest in this particular area, I believe that the Kettle Crest is best managed for a range of recreational experiences, similar to the way the area is currently managed. The Kettle Crest Recreation Area will be managed in part as backcountry. Non-motorized opportunities will continue to be emphasized along the nationally

designated trails at the top of the crest. Motorized opportunities will continue to be emphasized in backcountry-motorized management areas where these types of uses are already occurring.

In addition to the ROS map, there are several Forest-wide and MA-specific plan components that further guide future actions and ensure the desired range of ROS settings are achieved/maintained. For example:

FW-DC-REC-01. Recreation Settings and Experiences

The Forest provides a spectrum of high quality, nature-based outdoor recreational settings and opportunities varying from primitive to urban and dispersed to developed where visitors can experience the biological, geological, scenic, and cultural resources of the Forest, with an emphasis on the natural-appearing character of the forest.

Dispersed recreation opportunities are available (such as camping, backcountry skiing, boating, mushroom and berry picking, hunting, and fishing) and dispersed recreation sites (such as campsites, vistas, and parking areas) occur in a variety of ROS classes throughout the Forest.

Facilities for developed and dispersed recreation activities are appropriate for the ROS class and scenic integrity objective of the location and are designed to protect natural and cultural resources.

FW-STD-REC-01. Built Environment - Structures

All new structures associated with the built environment blend with the surrounding landscape and meet the ROS class and SIO design elements associated with the natural setting in which they are located. All new structures meet the appropriate regulations for accessibility. Existing facilities are reconstructed or maintained to meet the ROS and SIO design standards for the area in which they are located and to meet requirements for accessibility.

FW-GDL-REC-01. Recreation Opportunities

Recreation-related project-level decisions and implementation activities should be consistent with mapped classes and setting descriptions in the ROS and meet appropriate screening and SIOs.

Other suggested Special Interest Areas (SIAs): Calispell, Baldy, and Swan-Cougar were addressed in the FEIS (Vol. 3, page 1021-1022)

The term “special interest area” has been removed from the FEIS and proposed revised forest plan, to be consistent with terminology in Forest Service Manual 2372, which refers to special areas. All proposals brought forward by collaborative groups that support the idea of adding additional recreation areas (special areas) into the proposed revised forest plan were reviewed. Special areas are a type of special management area comprised of NFS lands that are: 1) not designated as wilderness, and 2) contain outstanding examples of plant and animal communities, geological features, scenery, or other unique attributes (such as recreation opportunities) that merit special management by the Forest Service. Unlike National Recreation or National Scenic Areas, which are designated by law through Congress, special areas are designated administratively by either the Regional Forester (for areas under 100,000 acres) or the Secretary of Agriculture (for areas greater than 100,000 acres). The primary management objective for a special area managed by the Forest Service is “to protect and manage for public use and enjoyment, special recreation areas with scenic, geological, botanical, zoological, paleontological, archaeological, or other special characteristics or unique values.”

The forest determined that the areas listed above do not possess the unique attributes necessary to merit a special management area designation, and were not included in the proposed revised forest plan as special areas or recreation areas. However, the proposed revised plan emphasizes

the Forest's commitment to work with collaborative groups to look for opportunities to enhance the recreational opportunities during the life of the revised forest plan. (FW-DC-REC-03 Sustainable Recreation; FW-DC-PA-02 Cooperation and Community Involvement).

Remedies:

1. Remove the Kettle Crest Recreation Area from the ROD due to our comments about the suitability of much of this area for Wilderness.
2. We ask Forest Plan drafters to take a fresh look at the potential economic benefits of locating SIAs where they abut or are near to rural communities that will benefit most from SIA infrastructure development and tourism. They detail the benefits of three specific areas (see below). Include the following Recreation Areas (formally SIAs):
 - a. Calispell
 - b. Baldy
 - c. Swan-Cougar [19-8]

Response To The Remedies:

The Kettle Crest area was analyzed for recommended Wilderness in Alternatives B and R.

Due to the variety of existing recreational uses and public interest in this particular area, the decision is to manage Kettle Crest for a range of recreational experiences, similar to the way the area is currently managed. It's designation as a Recreation Area will provide emphasis on the recreation opportunities. Non-motorized opportunities will continue to be emphasized along the nationally designated trails at the top of the crest. Motorized opportunities will continue to be emphasized in backcountry-motorized management areas where these types of uses are already occurring.

The forest assessed and determined that additional areas suggested by constituents for special area designation do not possess the unique attributes necessary to merit special designation. The Forest is committed to working with collaborative groups to enhance recreational opportunities during the life of the revised forest plan as evidenced by two desired conditions: FW-DC-REC-03 Sustainable Recreation; and FW-DC-PA-02 Cooperation and Community Involvement.

POSSIBLE INSTRUCTIONS (if any): None