

## **Travel Management**

WildEarth Guardians  
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Sierra Club/Alliance for the Wild Rockies  
Stevens County Commissioners  
American Forest Resource Council  
Pend Oreille County Commissioners

### **Objectors contend:**

- **The Forest Service is attempting to make motorized use designations in the revised Forest Plan.**
- **The revised plan fails to prioritize unneeded roads for decommissioning (opposite view expressed by one objector).**
- **The Forest Service fails to clearly articulate its proposed action regarding winter motorized recreation. Reference to routes and designated areas implies that the ROS settings designate routes and areas for winter motorized use, which does not follow the Travel Management Rule.**
- **Objectors believe Amendment #31 to the 1988 Colville Forest Plan 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 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 demonstrate the Forest Service's refusal to be guided by its forestwide TAR.**
- **The Forest Service fails to take seriously its responsibilities under the Travel Management Regulations at 36 CFR § 2125, Subpart A. The 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 § 2125, Subpart A. The FEIS and LMP violate the Travel Management Regulations.**
- **By sanctioning current routes without properly applying the Executive Order minimization criteria, the FS has acted in a manner that is arbitrary, capricious, an abuse of discretion. The FEIS fails to take a hard look at impacts from off-road vehicle trails and areas, and those impacts will significantly affect the quality of the human environment.**
- **Objectors contend there is no strategy to fund and ensure effective law enforcement to address illegal motorized use.**

## SUMMARY OF OBJECTIONS:

1. *Forest Plan fails to prioritize unneeded roads for decommissioning.*
2. *The revised Forest Plan does not comply with: Executive Orders 11644 and 119894; nor does it comply with the Travel Management Rule, parts A (using the Travel Analysis Report), B (attempting to make motorized use designations/Amendment #31), and C (forest plan fails to clearly articulate winter motorized use & implies ROS settings designate routes and areas).*
3. *There is no law enforcement strategy to address illegal motorized use.*

## REVIEW AND RESPONSE TO OBJECTIONS:

1. Forest Plans are strategic in nature, establishing broad direction to help guide future decisions at the local level. They do not include project or activity-level decisions. Prioritizing *unneeded roads for decommissioning*, as objector states, is a project level activity and not required in a forest plan. Future road related actions (such as construction and/or decommissioning), would require site-specific analysis before such actions could take place on the ground.

The Colville Forest Plan provides desired conditions, objectives, standards/guidelines, and suitability of areas in which to guide future decisions pertaining to the forest transportation system. Future project level decisions related to the forest road system would be informed by the 2014 Colville Forest-wide Travel Analysis Report (TAR). Additionally, the Colville TAR identifies approximately 1,295 road miles that under separate project-level analysis, *“should be considered for decommissioning, closure, converted to a trail, or mitigated to reduce resource risk.”* (pg. vi, TAR, Key Results and Findings).

I found the draft ROD, forest plan, EIS, and project record consistently reiterated differences between a forest plan and site-specific analysis, which addresses Objectors issue. Forest plan direction pertaining to the road system coupled with guidance in the forest TAR will inform future decisions pertaining to road decommissioning on the Colville NF. In conclusion, I find no violation of law, regulation, or policy.

2. Objector states the Forest failed to comply with: Executive Order 11644 (as amended by EO 11989); and subsequent parts of the Travel Management Rule. EO 11644 (and 11989) requires federal land management agencies to establish policies and procedures for management of motorized vehicles on public lands to protect resources, promote safety of users, and minimize conflicts among uses. The TMR established said policies and procedures (as required by the EO), by providing a consistent framework and consistent terminology for travel management decisions made at the local level.

The Colville forest plan provides programmatic direction as to where motorized and non-motorized recreation may or may not be suitable; also, the forest plan provides desired conditions, objectives, and standards/guidelines to help guide future access and travel management decisions to be made at a later date. The plan also provides direction to monitor wildlife habitat of listed species to ensure objectives are being met; and also requires monitoring of motorized mixed-use designations annually to ensure effects to natural and cultural resources are minimized and conflict of uses are being addressed.

Through completion of their 2014 Travel Analysis Report, the Colville complies with Subpart A of the TMR. The Colville TAR outlines desired conditions for a future road system and identifies opportunities for making

changes in order for the forest to reach a Minimum Road System. Recommendations from the TAR have been incorporated into the forest plan in the form of plan components which address ecological, economic, and social sustainability of the road system, including road density recommendations for some management areas. Future project level decisions related to the forest road system will conform to guidance in the forest plan and also be informed by the Colville TAR.

Amendment #31 to the 1988 Colville Forest Plan complies with Subpart B of the TMR. As required by the TMR, the process by which the Colville's 2008 EA and Amendment #31 to the 1988 forest plan restricted motor vehicles to existing roads, trails, and areas included public involvement and also considered effects on natural and cultural resources, public safety, and conflicts among uses of NFS lands. Future project level decisions related to motorized recreation will be guided by direction in the forest plan and compliance with the TMR.

The following statement in the draft ROD (page 8), "Allow motorized access on designated routes over approximately 75 percent of the forest in suitable management areas, and include desired conditions for road densities in focused and general restoration management area;" implies the forest will utilize forest plan components to guide future site-specific project level decisions for both summer and winter motorized designations. The objector interprets said statement, however, as the forest is "*attempting to make motorized use designations in the forest plan and*" subsequently "*implies ROS settings designate routes and areas for winter motorized use.*" The Colville Forest Plan provides desired conditions, objectives, standards/guidelines and suitability of areas in which to guide future decisions pertaining to the forest transportation system, including motorized recreation. Although I find no violation of law, regulation, or policy, I recommend the Final ROD clarify the statement on page 8 to remove any ambiguity associated with said statement.

3. Enforcement of travel management restrictions is not within the scope of forest plan decisions. The Colville National Forest annually publishes a Motor Vehicle Use Map that displays where motor vehicle use (except over-snow vehicles) can legally occur across the Forest. Forest officials, including law enforcement officials, utilize the MVUM to educate, inform, and when needed, enforce motorized restrictions. I find no violation of law, regulation, or policy.

**CONCLUSION:**

The Colville National Forest's MAs, identified ROS settings, and suitability determinations provide sideboards and guidance for future travel management decisions. This is consistent with FLMPA requirements. Route-specific decisions are not made in the LMP and should be done via subsequent travel management planning. Subsequent closures and/or newly designated routes would be done post forest plan revision and based on route-specific analysis.

**POTENTIAL INSTRUCTIONS:**

Clarify in the final ROD that:

- a) Project level decisions pertaining to the forest road system will be informed by forest plan direction and the Colville's 2014 Travel Analysis Report;

- b) Winter travel planning to designate OSV routes and areas open to motorized recreation will occur after completion of the Colville LMP as budget and capacity allows. In accordance with NEPA and the requirements of the TMR, site-specific analysis including public involvement will be part of the travel planning process.