

WILDERNESS AND ROADLESS: OBJECTOR PROPOSALS FOR WILDERNESS RECOMMENDATION

Primary Objectors:

- **Stephen Alastuey**
- Tahoe Area Sierra Club, Wilderness Committee, **Fred Roberts**
- Sierra Forest Legacy, Sierra Club, Friends of the River, California Wilderness Coalition, Snowlands Network, Sierra Nevada Alliance, Earthjustice, et. al., **Michael Graf and Craig Thomas**

Summary: Discussion during the May 20th meeting included a review of proposals contained in the California Wilderness Coalition DEIS comment letter. Steve Evans stated that these included proposals for Hellhole and Trimmer, within the Freel IRA, and a Meiss/Dardanelles proposal that did not include current mountain bike routes or WUI.

While the Hellhole and Trimmer proposals do exclude mountain bike routes and WUI, the Hellhole proposal is currently open to OSV use.

The Meiss/Dardanelles proposal excludes the portion of the Tahoe Rim Trail that is open to mountain bikes, but does not exclude the Big Meadow Trail that connects to the Rim Trail, also open to mountain bikes. Additionally, the northern border of this proposal is partially within the WUI. Thus California Wilderness Coalition did not propose a Meiss/Dardanelles recommended wilderness area that excludes mountain bike routes and WUI. The Forest Service would like to clarify whether the CWC is proposing a different boundary for the Meiss/Dardanelles area than what was proposed in the DEIS comment letter.

FEIS version: No recommended Wilderness was included in the selected alternative.

Objectors' proposal: Reconsider recommending wilderness in the selected alternative.

Previous Forest Service Instruction:

- Explain why objectors' recommendation to modify the boundaries to the Dardanelles and Freel Roadless Areas alternative was not explored further. Also, update the response to PC 418 in Appendix N-Response to Comments accordingly.
- Section 2.5.5 of the FEIS (p. 2-23) should be modified to clarify that approximately 12,000 acres of the CIRAs were added to the Backcountry Management Area in Alternative D **but were not analyzed for wilderness potential or considered for wilderness recommendation** under that alternative.

- Additional text should also be added to FEIS Appendix C (Evaluation of Areas for Potential Wilderness) to describe the basis for the inventory used to delineate potential wilderness. The current empty reference to “Section 6: The Inventory Process,” p. C-1, should also be corrected.
- An explanation as to why the CIRAs outside of the IRAs were not included in the inventory and evaluation for wilderness potential would also strengthen the project record. Specifically, LTBMU should explain whether any consideration was given to areas that are not IRAs but otherwise meet the criteria set forth in 1909.12, section 71.1---if such areas exist on the Management Unit.
- Modify the ROD to include a more specific and detailed discussion of the rationale for not recommending any areas for wilderness designation, providing additional specificity concerning why the Dardanelles Roadless Area and Freel Roadless Areas were not recommended in the selected alternative.
- If “motorized or mechanized access or use” is significant enough to warrant not recommending an area for wilderness designation, LTBMU may want to re-evaluate their Availability Assessment, documented in Appendix C, particularly in the case of the Dardanelles Roadless Area which listed such uses as LOW.

Also, while not mentioned by objectors, LTBMU should modify the following in the draft ROD and FEIS:

- Clarify that wilderness recommendations do not automatically equate to prohibitions on mountain bike and OSV use in those areas---congressional designation as wilderness would do that, but agency policy on management of recommended wilderness does not require that current non-conforming wilderness uses be prohibited in recommended wilderness. See FSM 1923.03. Make appropriate changes to the draft ROD, p. R-10; FEIS pp. 3-576, 3-577, 3-578.
- Modify the language about preservation of historic structures to clarify the nature and likelihood of potential impacts. See FEIS, pp. 3-575, 3-577. Suggested rephrasing: “Without enabling legislation that explicitly provides for their preservation or identifies them as contributing to the area’s wilderness character, wilderness designation could potentially limit the agency’s ability to maintain the historic Meiss Cabin, barn structures, and historic dams.”