

Meeting Summary
Roadless Area Conservation National Advisory Committee
February 20-21, 2008
Richard Tam Alumni Center, University of Nevada, Las Vegas

Participants

Committee Members Present:

- Adena Cook – Blue Ribbon Coalition
- Robert Cope – County Commissioner Lemhi ID
- Jeff Eisenberg – National Cattlemen’s Beef Association
- Paul Hansen – The Nature Conservancy
- Dale Harris, RACNAC Co-Chair – Montana Wilderness Association
- Jim Riley – Intermountain Forest Association
- Greg Schaefer, RACNAC Co-Chair – National Mining Association and Arch Coal
- Todd Schulke – Center for Biological Diversity
- Ray Vaughan – WildLaw
- Chris Wood – Trout Unlimited

Committee Members Absent:

- Darin Bird – Utah Department of Natural Resources
- Geraldine Link – National Ski Areas Association
- Denny Scott – Carpenters Union

U.S. Forest Service

- Tom Tidwell, Northern Regional Forester, Region 1, USFS
- Brad Gilbert, Team Leader for Idaho Roadless Rule EIS, USFS
- Jessica Call, RACNAC Coordinator, USFS
- Richard Cook, DFO, Deputy Director EMC, USFS
- Bill Supulski, Roadless Area Conservation Coordinator, USFS

Idaho

- Thomas Perry, Counsel to the Governor, State of Idaho

Facilitators:

- Kathleen Rutherford, Kearns & West
- Janet Thomson, Kearns & West

Committee Agreements

Upcoming RACNAC Meetings: The RACNAC resolved to hold subcommittee meetings prior to the next RACNAC meeting (scheduled for April 1-2, 2008, in Washington DC) to select options that will shape final recommendations.

Management Themes: The RACNAC agreed that the lands managed under the Backcountry/Restoration theme are not uniform and therefore should not be subject to uniform management. Additionally, the Committee agreed that it needs to make a recommendation on community protection zones within the Backcountry/Restoration theme.

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Change Clause: The RACNAC generally supported the idea that public comment periods for significant changes may need to be extended beyond the minimum 30 days listed in the draft Idaho rule. The RACNAC may consider providing additional recommendations to the State of Idaho on how the RAC-like Implementation Commission should function.

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| Additional Meeting Highlights |
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Welcoming Remarks and Introductions:

Dale Harris, RACNAC Co-Chair, welcomed the Committee. Kathleen Rutherford, Kearns & West, reviewed the ground rules and noted that the meeting objectives are to review and modify options to solve issues identified at the January 16-17, 2008 RACNAC meeting. Options presented were generated by the workgroup meeting held on February 19, 2008. Advice to the Secretary will be formulated at the April 1-2 meeting in Washington, D.C.

Role of RACNAC in Rulemaking

Jim Riley provided an overview of the differences in management prescriptions in the 2001 Roadless Rule, Idaho forest plans, and the draft Idaho rule. The purpose of the comparison was to provide a historical reference for the discussion of Idaho's desire to enable community protection on roadless lands. Riley reiterated Lt. Governor Risch's suggestion that the RACNAC may be able to help clarify the text of the draft Idaho rule and reduce fear that the rule will provide an opportunity for greater management activities than what the State intends.

It was noted that the RACNAC can determine the specificity of its advice provided to the Secretary of USDA. The committee was encouraged to think globally, discussing specific Inventoried Roadless Areas (IRAs) only to explain or highlight broader policy issues. It was further noted that while consensus recommendations are the target, in certain instances consensus solutions may not be viable. Where this is the case, it may be possible to agree to a suite of options, without recommending any single path forward. And in another scenario, the group can at least agree to identify to the Secretary and Governor what the dimensions of the challenges are.

Community and Municipal Watershed Protection

The flexibility necessary for protection of communities and municipal watersheds was understood to be of primary importance to the Governor. Options developed by the workgroup to clearly articulate what this might look like include:

- Healthy Forests Restoration Act (HFRA) definitions for Wildland/Urban Interfaces (WUIs)
- Community Wildfire Protection Plans (CWPPs)
- The parameters identified in the Idaho Draft Environmental Impact Statement (DEIS) (roughly a mile buffer around communities)
- The definition provided by The Wilderness Society (essentially a half-mile buffer around communities, with a community defined as one structure within a 40-acre area)
- A hybrid of CWPPs combined with an additional "significant risk" test to be defined by USFS

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- CWPPs that were created combining scientifically credible geospatial data while maintaining local on the ground knowledge

Discussion:

A complexity identified with using a protection standard based on CWPPs is that federal agencies cannot delegate rulemaking power to local government, which could happen since counties have the ability to amend their CWPPs (and, therefore, the management of Roadless areas) at their desire. A method would need to be designed that uses county information without ceding the federal government's regulatory authority. Two other tradeoffs discussed include the CWPP+ significant risk option may prove more burdensome and may prohibit communities from addressing community protection issues in a timely manner. Conversely, more clearly-defined WUI and municipal watershed boundaries will allow faster action. And finally while using CWPPs incorporates significant on-the-ground knowledge it may open an overly-broad section of national forest lands to treatment.

The RACNAC agreed that the lands managed under the Backcountry/Restoration theme are not uniform and therefore should not be subject to uniform management. Additionally, the Committee agreed that it needs to make a recommendation on community protection zones within the Backcountry/Restoration theme.

Maintaining Roadless Area Values and Characteristics in the Backcountry

The work group devised two diagrams to illustrate options on the significant risk threshold used to manage Backcountry/Restoration areas. The first diagram contains two concentric circles: the inner circle represents community protection zones, inside of which no test would be applied for treatment; the outer circle represents the remaining Backcountry/Restoration lands, subject to an imminent threat standard for treatment.

The second diagram contains three concentric circles: the inner circle represents clearly-defined community protection zones eligible for risk reduction activities, not subject to any test for treatment; the middle circle represents areas that may be managed for forest health, hazardous fire risk management, or other limited treatments, subject to a significant risk standard; and the outer circle represents the rest of the Backcountry/Restoration lands in which management action is subject to an imminent threat standard.

When considering management of the middle circle, the workgroup noted that sideboards could include regulatory language advice as follows:

- Define significant risk
- Define conditions (e.g. condition class, timing, large tree retention, ecosystem composition and structure; incorporate qualitative language from 2001 rule; need to prove)
- Ceiling on acreage, miles
- Clarify: Does the USFS/or counties need flexibility for temporary roads in these lands, i.e. between the community protection zone and the backcountry?

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A procedural relief valve such as a community collaborative that is representative, RAC like, and project specific was also contemplated, noting that the implementation commission would take state wide views.

Recommendations for defining these areas included:

- Considering using 2001 Roadless Rule qualitative language about ecological conditions (harvesting generally small diameter trees, harvesting infrequently, etc.)
- Maintaining and enhancing all roadless values and characteristics in the long term
- Defining significant risk for wildland fire effects
- Limiting acreage/mileage on a time basis that enables annual flexibility
- Prohibiting road construction/reconstruction

It was noted that the term significant risk must be defined in the rule. The work group additionally discussed options for defining significant risk:

- Use significant risk to define WUIs
- Using the HFRA Field Guide language
- Having the RACNAC develop language

Discussion:

Several members voiced concern that key elements of the general understanding forged with Governor Risch in November 2006 as to the scope and intent of the proposed rule are absent in the proposed draft rule. One such element, characterized as critical to those members' joining the consensus advice to recommend the Idaho Petition to the Secretary was the understanding that protections under the Backcountry/Restoration theme would be analogous to those afforded in the 2001 Roadless Rule.

Some RACNAC members felt that if management activities are permitted in community protection zones then no management activities should be taken in the rest of the Backcountry/Restoration lands, to preserve the compromise understanding the RACNAC came to with Governor Risch in November 2006. The group debated how to provide sufficient flexibility in managing community protection zones in a way that allows for future changed circumstances without creating overly permissive standards.

In order to help define management activities, the Governor's Roadless Rule Implementation Commission could take a statewide assessment of activities, and/or the Idaho rule could stipulate project-specific collaborative groups representative of affected interests (commodities, counties/communities, environmental interests, etc.).

History of Significant Risk Discussion

Tom Perry explained how the term "significant risk" came to be included in the draft Idaho rule. Before the November 2006 RACNAC meeting, Governor Risch was shown the text of the Final Environmental Impact Statement (FEIS) for the 2001 Roadless Rule and, not being very familiar

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with the rule, stated that those exceptions for road construction/reconstruction seemed roughly analogous to his intentions for Backcountry/Restoration area management. When presenting the Idaho petition at the November 2006 RACNAC meeting, Governor Risch described Backcountry/Restoration area management as consistent with the 2001 Roadless Rule. When the State and USFS proceeded into rulemaking it became clear that the “imminent threat” standard for providing community protection was not as permissive as Governor Risch intended it to be to prevent catastrophic wildfire. The State learned that imminent threat means “red lights and sirens,” and Governor Risch desired greater flexibility to provide for preventative treatments. In order to broach that gap the State found text in HFRA regarding “significant risk” which seemed to provide the necessary flexibility to allow for treatments for community protection zones. Lt. Governor Risch adopted this term in the draft Idaho rule to correlate with his previous understanding of the flexibility that could be provided under “imminent threat.”

The opportunity for the RACNAC to help clarify the State’s intentions regarding Backcountry/Restoration area management and to help Idaho define temporary road closure standards was noted.

Change Clause

Workgroup options included:

- Use NEPA like determination of significance, explain in preamble
- Add 30 day public notice and comment
- Use 30 day period to help determine significant/insignificant
- Increase 30 day comment on significant issues (or provide mechanism to request an extension)

Discussion:

The RACNAC discussed whether a “significant” change to the Idaho rule would equate to the regulatory definition of “significant” used in the forest planning process or the NEPA process. The working group preferred to link the term to the NEPA process in the preamble to the rule since the NEPA process evaluates the impacts to the environment and the degree of public controversy, while the forest planning process determines significance in terms of change to the current forest plan. Additionally, a body of literature is available on the significance standards under NEPA that would provide guidance and guidelines for USFS.

The RACNAC generally supported the idea that public comment periods for significant changes may need to be extended beyond the minimum 30 days listed in the draft Idaho rule. The RACNAC may consider providing additional recommendations to the State of Idaho on how the RAC-like Implementation Commission should function.

Implementation Commission (IC)

Discussion here went primarily to whether they ought to have a clear regulatory charge and whether they ought to be both statewide and project specific in scope. It was noted that role,

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function and purpose of the IC ought to be articulated in the preamble. Sideboards would be useful to state on types of issues the commission might consider.

Phosphate Mining

Tom Perry (Idaho) provided an informal overview of the phosphate mining section of the draft Idaho rule. The rule does not affect existing rights to phosphates but provides an exception in Backcountry/Restoration areas for potential future leasing access in Known Phosphate Leasing Areas (KPLAs) in the Caribou-Targhee National Forest. Lt. Governor Risch has requested assistance in creating sideboards on these provisions to allay the fear that all 5.5 million acres of Backcountry/Restoration lands could be developed for phosphate mining. Two options for sideboards include:

- ❖ Moving KPLAs and necessary access lands to the General Forest classification or
- ❖ Limiting phosphate mining to existing KPLAs (approximately 12,000 acres).

Other options offered by the workgroup include:

- ❖ Hybrid- move probable/immediate projects to General Forest
- ❖ No new phosphate mining in IRA's/backcountry
- ❖ Utilize 2001 provisions for Oil and Gas
- ❖ Mitigation success contingency- no new operations until mitigations are proven effective

Discussion then generated another option:

- ❖ Move some General Forest lands in the Caribou-Targhee National Forest into Backcountry/Restoration, in exchange for moving KPLAs from Backcountry/Restoration to General Forest.

Discussion of Special Areas of Historic or Tribal Significance (SAHTS)

Regional Forester Tom Tidwell has offered to be personally involved with formal consultation with the tribal chairs. USFS has been working to clarify why this rulemaking is unusual vis a vis government to government consultation processes. There are some remaining differences about what activities are allowed in Backcountry/Restoration areas. The Tribes generally desire the protections provided under the 2001 Roadless Rule and some are concerned about the current draft rule provisions for road building and timber harvest in Backcountry/Restoration areas.

Management Themes

This discussion centered primarily on backcountry and general forest designations, and definitions. It was noted that it is beyond the scope of the RACNAC to investigate every single designation of these lands, but through public testimony, committee deliberation, and conversations with both State and USFS personnel that advice on some changes, or the criteria by which to evaluate whether a change ought to occur would be valuable. Both the State and USFS indicated they are open to well reasoned change recommendations.

Adena Cook presented her findings on the management themes applied to the Caribou-Targhee National Forest. She noted that the Caribou-Targhee National Forest Management Plan does not include much discussion of roads because the Caribou and the Targhee have prescribed road and

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motorized trail densities that cannot be exceeded. Forest-wide, these densities are currently at their limits so that new trails cannot be built in those areas. Therefore, any proposed road construction in General Forest areas would be in violation of the road trail density requirements and could not occur. The road trail densities vary per management prescription from two miles per square mile of road/trail down to about half a square mile per square mile.

The USFS is open to limited changes in the management theme assignments if such proposed changes have a solid rationale and broad support. The USFS supervisor at the Caribou-Targhee National Forest prepared a briefing paper for the RACNAC on how some of the management theme assignments might be modified. Appreciation was expressed for the thoroughness of this process, and it was requested that this be acknowledged and shared with other Forest Supervisors in Idaho. A recommendation was made to support those recommendations supported by the conservation community and forest supervisors. It was noted that while important, a statewide review at the Regional Forester level would be necessary for the State to be comfortable with those recommendations. A draft set of criteria for change in management allocation was drafted, and requested to be appended to the letter distributed to Forest Supervisors. It includes:

Issues for change consideration:

- Wildlife habitat, e.g. mule deer
- Forest health, e.g. beetle kill
- KPLA's
- Community protection
- Is there a way to meet IRA management objectives other than GF allocation?
- If road density is maxed, and it is unlikely that more roads will be built, why not move it into backcountry? (i.e. WUI)

It was questioned whether sideboards for flexibility for the community protection are best executed in management theme allocation, or whether the WUI/watershed designation may be a better vehicle. Finally, it was noted that in the original letter from the committee to the Secretary recommending the petition for rulemaking, a specific request was made to specify the rationale for each IRA designated as General Forest. This information is requested again, beyond that which is in the DEIS appendix, for the April meeting.

It was noted that the analysis from the Forest Plan EIS's, upon which the Idaho rule DEIS is based, does not include analysis for allowing road construction or reconstruction for any reason other than rangeland or timber in any area. Opening lands to General Forest management, which allows for road building for oil and gas or geothermal exploration and development, is therefore not supported by the DEIS. Options discussed to address this included additional NEPA analysis or a method that changes the General Forest management theme to be broader than GRFG but not wide open.

Other options discussed:

- Leave KPLA's and move rest into backcountry
- Split theme into phosphate areas and rec/gfrg

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- Delay, get analysis done
- Execute a targeted change clause analysis, e.g. geothermal

It was also noted that the Forest Service and State are inconsistent with references to the Travel Management Process in the DEIS, Rule, and suitability tables.

Temporary Roads

Kathleen Rutherford reviewed the actions/issues that the temporary roads subcommittee had begun to address at the national level. Following the LaPorte ruling, this group opted to place the discussion back into the whole committee's agenda. USFS noted that the questions/issues identified by the subcommittee would be useful, including:

- How are temporary roads defined?
- Under what conditions can temporary roads be used?
- What is the relationship between forest plan prescriptions and road construction?
- To what extent can roads be used to address wildland fire? For prescribed fire?
- What assurances can be provided that a temporary road will be removed at the end of the project?

It was noted that this is a feasible task for the committee, e.g. agreement could be forged around if a temporary road is considered, it would need to be built to minimum standards for industry, it should be closed to any other purpose other than that it was intended for, and there needs to be a verifiable mechanism to close it.

Discussion pertaining to differences Between Submitted Idaho Petition and Idaho Draft Rule

Throughout the meeting several observations were made that the proposed rule varied somewhat to wildly from committee members' expectations based on their understanding of Governor Risch's intent as predicated on the November 2006 RACNAC meeting. Concerns articulated included issues of procedural integrity and trust, and were primarily focused on the degree to which the Backcountry allocation in the proposed rule is markedly less protective than the 2001 Rule. Alternately, it was noted that rulemaking is an iterative process, and that the devil is in the details. The USFS, the State and Committee and public have weighed in on and/or have forged broad based agreements which shift in some circumstances due to application of those details. In this view, there are multiple levels of understanding to be forged, and appreciation was expressed to all parties for their ongoing participation.

Public Comment:

The following oral public comment was offered to the Committee regarding significant risk and stewardship roads:

- Jonathan Oppenheimer (Idaho Conservation League). About 59,000 acres of IRAs are located in zones of high fire risk to communities and about 160,000 acres are in moderate-high risk zones. It is important to realize that the relatively highly impacted community areas are only a very small portion of the Backcountry/Restoration lands.

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While the HFRA Field Guide has good examples on how to think about risk, those sections only apply to municipal watersheds and ecosystems and not to communities. We have concerns about redefining WUIs at this point in the process because there must be an opportunity for public comment on it. There should be some consideration for looking at municipal watersheds in a different light than simply community protection because of water quality concerns in those areas. There is a discrepancy between the WUI acreage discussed in the DEIS and in the preamble to the draft ID rule (12,000 acres vs. 22,500 acres). Lastly, note that the Primitive theme has the same language with regards to timber cutting as the Backcountry/Restoration theme. The WUI discretion we are discussing would likely occur on both Primitive and Backcountry/Restoration areas, but roadbuilding would be prohibited on the Primitive lands.

- Scott Stouder (Trout Unlimited). The term significant risk has caused real trouble. While “imminent threat” and “significant risk” are both subjective terms, I think the Committee should expand on “imminent threat” in order to treat municipal watersheds and WUIs and should get rid of “significant risk.” The circle diagrams are useful and there is a section within the inner circle (defensible space) that everyone can agree upon. We should start the conversation with those areas that everyone can agree upon and work outwards – that will allow us to come to broad agreement.
- Mathew Jacobson (Pew Environmental Group). I am concerned that the RACNAC reached a compromise solution with Governor Risch in November 2006 and it seems that solution has been breached. We need to be clear about the amount of acreage that is being affected by the significant risk standard for Backcountry/Restoration land management. The more specific we are when defining parameters of treatment for community impact lands, the less it will seem like an abandonment of the November 2006 agreement.
- Rob Vandermark (Pew Environment Group). With the confusion over the language in the draft rule, I think we should use the imminent threat language in the 2001 Roadless Rule to provide the clarity that is needed. Using significant risk is problematic because it is not clearly defined anywhere.

The following oral public comment was offered to the Committee regarding the change clause and phosphate mining:

- Alan Prouty (Idaho Mining Association; Simplot). Idaho contains one of the major phosphate reserves in the country; it is part of the Congressionally-designated Western Phosphate Field strategic reserve. Fifteen percent of the country’s phosphate comes from that area, which will become more significant in the next decade as sources in the east decrease. Most of the phosphate goes into fertilizer and some is used in an elemental phosphorous plant (the only one in the western hemisphere). The revised Caribou-Targhee National Forest Management Plan provides the opportunity for environmental

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review and exploration of potential sites and an ability to submit mine plans. We would like to continue to have access to those opportunities in the Idaho roadless rule.

- Matthew Jacobson (Pew Environmental Group). The GYC says that the Caribou-Targhee National Forest is the largest remaining block of relatively pristine lands in the western United States. It is highly valued habitat, so development of phosphate areas in this region is a concern. Also, the DEIS says that mitigation will likely be required to address any effects from selenium; we should make mitigation mandatory.
- Jonathan Oppenheimer (Idaho Conservation League). The impacts on the environment of phosphate mining should be looked at closely. If the Smoky Canyon lease is approved that could create a domino effect of lease approvals. We need to ensure that the FEIS examines the potential that the approval of the Idaho rule directly affects the approval of the Smoky Canyon mine. Additionally, approving phosphate mining in Backcountry/Restoration areas is not consistent with the November 2006 agreement between the RACNAC and Governor Risch. We would like to see both public comment and public notice provided for in the case of significant and insignificant changes to the rule.
- Scott Stouder (Trout Unlimited). I think the more palatable of the State's two options regarding management of KPLA lands is to transfer the lands to General Forest, in return for converting some of the current General Forest lands to Backcountry/Restoration management. Many of our members and local folks in southeast Idaho feel they are being singled out as the percentage of Caribou-Targhee National Forest lands identified as General Forest is far greater than for any other forest in the state. Perhaps it would even be more palatable to transfer lands equal to twice the amount of KPLA acreage to the Backcountry/Restoration theme to earn support from the communities in and near the Caribou-Targhee.
- Rob Vandermark (Pew Environment Group). It will be very important to get the Governor's Roadless Rule Implementation Commission right. There are RAC committees under HFRA and under the Secure Rural Schools Act – it might be confusing to have a third committee doing potentially duplicative work unless the new committee is very clearly defined. Regarding phosphate mining, if we are only really talking about 12,000 acres, why does it not say that in the DEIS or the proposed rule? The current text could be interpreted as allowing leasing and mining for any future phosphates that are found. As a citizen I am very concerned about selenium poisoning and the potential for creating seventeen Superfund sites. Phosphate mining does create jobs, but releasing poisons into the environment affects salmon runs, trout runs, animals, and humans.

The following oral public comment was offered to the Committee regarding management themes:

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- Rob Vandermark (Pew Environment Group). There is a lack of clarity about the applicability of the draft Idaho rule to recreation management for roadless areas. The petition states that motorized use within Primitive areas is not permitted, yet the draft rule references the use of travel management planning. The final rule and FEIS should be made consistent by removing all references to permissible recreation activities; the documents should have clear statements indicating that the travel management planning process will be used to define recreation activities on these IRAs. Additionally, we should consider adding in language to clarify that roads cannot be built beyond the prescribed road and trail densities.
- Brad Brooks (The Wilderness Society). I think we should go back to the pretext that there should be a rationale for why each piece of land is placed under General Forest management, rather than why portions of IRAs are not included in the General Forest management theme. The appendix in the DEIS does not provide sufficient rationale.
- Jonathan Oppenheimer (Idaho Conservation League). It would be clearer if the definitions in the rule contained no reference to recreation, as they currently do, and I hope the RACNAC will specifically recommend that the rule remain silent on the issue of recreation. We originally heard that the rationale for putting lands in the General Forest theme was either that the lands were roadless or that the areas did not contain timber. These lands still have roadless values and characteristics whether or not there is timber on them. The DEIS indicates that there are 1800 miles of roads in roadless areas in Idaho, of which 1219 miles are in the Backcountry/Restoration category. This does not correlate with the statement that roadless areas do not deserve roadless protection. The maps I have distributed clearly indicate that there are areas slated for General Forest management that do not meet the definition and purpose outlined by Governor Risch in November 2006. Regarding issues that may require further investigation, I think the RACNAC should add to that list a discovery of where the roads are in the General Forest category. Additionally, I want to note that there are some slivers of General Forest lands along boundaries of IRAs that were put in that category because of inventory issues. I encourage the RACNAC to look into that issue.
- Matt Jacobsen (Pew Environment Group). I think it is necessary to acknowledge if a previous agreement is being re-negotiated; otherwise it undermines the integrity of the entire process and leads to cynicism. Regardless of whether changes were made in good faith or for good reason, dismissing previous agreements is not acting in good faith.

The following oral public comment was offered to the Committee regarding temporary roads:

- Jonathan Oppenheimer (Idaho Conservation League). We are supportive of bringing the language regarding temporary roads for mining activities to the section on timber roads. Additional language should be required regarding minimizing the impacts of roads on surface resources, surface disturbance, applicable leases, and other requirements. In terms of defining roads, it is important to note that we are changing from an existing

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condition since the 2001 Roadless Rule defines classified and unclassified roads and the “forest roads” mentioned in the draft rule have not been defined in the DEIS analysis. This lack of clarity might allow any road on the landscape to be logged.

- Brad Brooks (The Wilderness Society). Before we talk about standards for temporary roads we need to define why we need the roads in the first place. Are there ways to reduce the risk of wildland fire without building roads? We need to define the risk before we build roads to address the risk. We also need to be clear about identifying the funding to reclaim roads. Also, simply blocking a road with a gate is not sufficient to prevent use.
- Rob Vandermark (Pew Environment Group). The DEIS makes an attempt to address the timeframe for reclaiming roads by indicating that they should be closed and revegetated within a ten-year period. It is hard to believe that would not have a permanent effect on the landscape. According to the 2005 Government Accountability Office report, the roads in Idaho have over a \$600 million backlog in maintenance. There is just not enough money to reclaim roads. I would recommend that everyone read the report that went along with the 2001 Roadless Rule, authored by Chris Wood, that describes how USFS deals with temporary roads.
- Scott Stouder (Trout Unlimited). In Idaho, at least south of the Clearwater, once you scar the land it takes decades to obliterate roads and trails. Vegetation here grows slowly and noxious weeds are a real problem. Idaho has lots of roadless land simply because it is difficult to build roads in many of these areas. While four miles per year of road building does not sound large it has a substantial effect on the Idaho environment.

Written comments to the Committee were received from:

- B. Sachau
- Coeur D’Alene Tribe
- Greater Yellowstone Coalition
- Heritage Forests Campaign
- Idaho Conservation League
- Idaho Mining Association
- Jim Trenholm
- Theodore Roosevelt Conservation Partnership
- The Wilderness Society

Follow up/Actions

- Language will be drafted for each of the options generated to serve as the basis of advice formulation for the April 1-2 RACNAC meeting.
- Help clarify the State’s intentions regarding Backcountry/Restoration area management and to help Idaho define temporary road closure standards.

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- The RACNAC may consider providing additional recommendations to the State of Idaho on how the RAC-like Implementation Commission should function, such as developing sideboards on types of issues the commission might consider, and whether their scope should be limited to a state wide view, or whether a project specific focus would also be useful.
- The working group preferred to link the term “significant” to the NEPA process in the preamble to the Rule since the NEPA process evaluates the impacts to the environment and the degree of public controversy, while the forest planning process determines significance in terms of change to the current forest plan.
- RACNAC will pursue the conversation on temporary roads and formulate advice that would aim to resolve key challenges.
- Management themes and IRA discssuion
 - In the original letter from the committee to the Secretary recommending the petition for rulemaking, a specific request was made to specify the rationale for each IRA designated as General Forest. This information is requested again, beyond that which is in the DEIS appendix, for the April meeting.
 - The Committee resolved to send a letter of appreciation to the regional forester for the briefing paper prepared by the Caribou Targhee National Forest Supervisor that analyzes and makes recommendation to refine the management themes on that forest.
 - A draft set of criteria for change in management themes was drafted and requested to be appended to the letter to Forest Supervisors.