

3.14 INVENTORIED ROADLESS AREAS

3.14.1 Background

In 1979, the U.S. Forest Service conducted a nationwide Roadless Area Review and Evaluation (RARE II) to inventory roadless areas on NFSL throughout the United States. Among these roadless areas were the Goat Rocks Addition #6036, south of US 12 in the vicinity of White Pass, and Cougar Lakes #6032, north of US 12, in the same vicinity.

Passage by Congress of the Washington Wilderness Act (P.L. 98-339) in 1984 resulted in the designation of several of the RARE II areas as Wilderness in Washington State, including the addition of 23,000 acres of the Goat Rocks Addition #6036 to the Goat Rocks Wilderness adjacent to White Pass (refer to Figure 3-43). Congress further specified in the legislation that areas in the State of Washington not designated as wilderness by the Act “shall be managed for multiple use in accordance with land management plans pursuant to Section 6 of the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Planning Act of 1976: ***Provided that such areas need not be managed for the purpose of protecting their suitability for wilderness designation prior to or during revision of the initial land management plans*** [emphasis added] (P.L. 98-339, Section 5[b][3]).” In addition, Congress removed 800 acres in Hogback Basin from the Goat Rocks Wilderness, to be considered specifically for its “significant potential for ski development” (Senate Report 98-461, May 1984).

The implementing regulations of the National Forest Management Act (36 CFR 219.17), issued in 1982, required the Forest Service, unless otherwise provided by law, to evaluate roadless areas and consider them for recommendation as “potential wilderness areas during the Forest planning process...” Forest Service direction in Forest Service Manual 1923 and 2320 and in Forest Service Handbook 1909.12, Chapter 7, required that an inventory of areas with wilderness potential be conducted, that these inventoried areas be evaluated for potential recommendation as wilderness, and that management direction be provided for all of these lands. Because of the provisions of the Washington State Wilderness Act, roadless areas in Washington State were inventoried during Forest planning (refer to Appendix C of the Forest Plan Environmental Impact Statements) and management direction was developed. No recommendations for wilderness designation were made.

During the roadless area inventory phase of the Gifford Pinchot Forest planning process, the 800-acre Hogback Basin removed from Wilderness by the 1984 Washington Wilderness Act was combined with a remaining portion of the Goat Rocks Addition #6036 to create the White Pass IRA. This IRA is located west of, and immediately adjacent to, the existing White Pass Ski Area. In identifying this area as an IRA, the *Environmental Impact Statement for the Gifford Pinchot Land and Resource Management Plan* also acknowledged the intent of the deletion of the 800-acre Hogback Basin area from Wilderness to provide for possible expansion of the White Pass Ski Area (refer to FEIS for the GPNF Forest Plan, pages C-181 and C-182.) The area was allocated to Developed Recreation and it was anticipated that the associated

Recreation Opportunity Spectrum class would change from Semi-Primitive Non-Motorized to Roaded Natural as a result of developments associated with future ski area expansion.

3.14.2 Management of Inventoried Roadless Area

The management direction for lands within each IRA that was specified through Forest planning has since been augmented by subsequent rulemaking and directives.

In January 2001, the Roadless Area Conservation Rule (“Roadless Rule”) was adopted by the Forest Service. This rule established prohibitions on road construction, reconstruction and timber harvesting, with some specific exceptions, in IRAs on NFSL. The IRAs to which this rule applies were defined in the Roadless Rule as those identified “in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000...” (36 CFR 294.11). In the vicinity of White Pass, the White Pass IRA, Goat Rocks Adjacent IRA, and William O. Douglas Adjacent IRA, are all subject to this rule.

In 2005, the 2001 Roadless Rule was replaced by the State Petitions for Inventoried Roadless Area Management Rule, which established a petitioning process that provided Governors an opportunity to “seek establishment of or adjustment to management requirements for National Forest System inventoried roadless areas within their States” (36 CFR 294, 25654). One year later, on September 20, 2006, the U.S. District Court for the Northern District of California set aside the 2005 Rule and reinstated the 2001 Roadless Rule. As of the publication date of this FEIS, the 2001 Rule applies to management of the IRAs within and adjacent to the proposed expansion area.

As mentioned above, the 2001 Roadless Rule generally prohibits road construction and reconstruction, and the cutting, sale, or removal of timber within an IRA, with certain exceptions (seven of these applying to roads, and five exceptions for the cutting, sale or removal of timber). The preamble to the Roadless Rule notes that management actions not requiring the construction of new roads would still be allowed (36 CFR 294). For agency consistency, the definition of a road was included in the 2001 Rule (36 CFR 294.11). These definitions are the same as those adopted in the final National Forest System Road Management Rule (36 CFR 212) and policy.

The preamble to the 2001 Roadless Rule also clarified the provision that “timber cutting, sale or removal in inventoried roadless areas is allowed when incidental to implementation of a management activity not otherwise prohibited by this rule.” Among the examples given were trail construction or maintenance, and “other authorized activities such as ski runs and utility corridors” (36 CFR 294, 3258).

The 2001 Rule does not prohibit future special use developments in IRAs. However, timber cutting, sale or removal and road construction or reconstruction associated with these uses are made subject to the prohibitions and rule exceptions described in 36 CFR 294.12 and 294.13.

In addition to the 2001 Roadless Rule, current direction for management of IRAs is provided by a USDA Forest Service Interim Directive for the protection of roadless areas (Interim Directive 1920-2006-1). This Interim Directive, which is effective until July 16, 2007, specifies the decision authority for the exceptions provided in the 2001 Rule.

3.14.3 IRA Criteria

As utilized during the RARE II process and refined in Forest Service Handbook 1909.12, Chapter 70, there are specific criteria that qualify an area for placement on the roadless inventory. Either criteria 1 and 3, or criteria 2 and 3, must be met (USFS 1992):

1. Areas contain 5,000 acres or more.
2. Areas contain less than 5,000 acres but can meet one or more of the following criteria:
 - a. Areas can be preserved due to physical terrain and natural conditions.
 - b. Areas are self-contained ecosystems, such as an island, that can be effectively managed as a separate unit of the National Wilderness Preservation System.
 - c. Areas are contiguous to existing wilderness, primitive areas, Administration-endorsed wilderness, or potential wilderness in other Federal ownership, regardless of its size.
3. Areas do not contain forest roads (36 CFR 212.1) or other permanently authorized roads, except as permitted in areas east of the 100th meridian (sec. 71.12).

The Forest Service Handbook guidance further provides criteria for developments that, if present, would not disqualify a potential wilderness area from inclusion in the roadless inventory (USFS 1992). Those relevant to the analysis of the IRAs in the vicinity of, or overlapping with, the proposed project area include:

1. Electronic installations, such as cell towers, television, radio, and telephone repeaters and the like, provided their impact is minimal.
2. Recreation improvements such as occupancy spots or minor hunting or outfitter camps. As a general rule, do not include developed sites. Areas with minor, easily removable recreation developments may be included.
3. Timber harvest areas where logging and prior road construction are not evident, except as provided in Section 71.12 for areas east of the 100th meridian.

4. Ground-return telephone lines, electric lines, and powerlines, if a right-of-way has not been cleared.

As part of the analysis for the White Pass Ski Area expansion project, these criteria were applied to determine whether the IRAs within the White Pass Study Area would continue to qualify for placement on the inventory, and to assess the impact that implementation of the proposed ski area expansion would have on the qualifications of these IRAs, or portions of IRAs, for inclusion in the inventory of potential wilderness areas. The results of this analysis are provided in the following sections.

3.14.3.1 Application of Inventory Criteria to IRAs within the White Pass Study Area

There are three IRAs within the White Pass Study Area. The following presents a brief description of each with respect to the criteria that qualify these IRAs for placement on the inventory of areas with wilderness potential. The conclusions regarding these IRAs are consistent with the inventory of potential wilderness areas conducted as part of Forest Plan revision.

Goat Rocks Adjacent IRA

Located in the eastern portion of the White Pass SUP area and extending to the Goat Rocks Wilderness east of, and outside the SUP area, this IRA was established during the Forest planning process as a portion of the former Goat Rocks IRA #6036. The several smaller parcels not incorporated into wilderness by the Washington Wilderness Act, a total of 7,357 acres, were re-inventoried in 1990 during Forest planning of the Goat Rocks Adjacent IRA.

The Goat Rocks Adjacent IRA parcel within the White Pass Study Area is approximately 247.8 acres in size. Although it contains less than 5000 acres, it meets the acreage exceptions for placement on the inventory of potential wilderness areas because of its juxtaposition with the Wilderness boundary. However, substantial recreational developments have occurred here over the last 50 years. As shown in Figure 3-43, a majority of this parcel (approximately 6.05 acres) contains buildings, ski trails, utilities and mountain roads associated with the White Pass Ski Area. The use of mechanical equipment for the clearing and maintenance of ski trails, access roads and other facilities is evident. Although the facilities adhere to the required visual quality standards, they remain apparent to ski area visitors, as is typical of developed recreation sites (refer to Section 3.15 – Visual Resources). Because of the level of development, this portion of the Goat Rocks IRA no longer meets the criteria for inclusion in the inventory of areas with wilderness potential (USFS 1992, 71.11).

Under the WNF Forest Plan, this parcel of the Goat Rocks Adjacent IRA was allocated to Administratively Withdrawn – RE-1 (Developed Recreation) to incorporate the White Pass Ski Area SUP area and other lands with recreation facilities in the vicinity (refer to Figure 3-43).

Approximately one-third of this parcel (143.7 acres) is located between the eastern boundary of the White Pass SUP area and the Goat Rocks Wilderness, further to the east. With the exception of the PCNST, which passes through the IRA from north to south, it is currently undeveloped, and will remain so. Because there are no proposals for expansion into this portion of the Goat Rocks Adjacent IRA, it will not be discussed further.

William O. Douglas Adjacent IRA

The William O. Douglas Adjacent IRA is made up of several relatively small parcels scattered along the William O. Douglas Wilderness boundary. Approximately 955 acres (4 percent) of this IRA is located in the far northwest corner of the existing SUP area, extending north to the William O. Douglas Wilderness. It contains the White Pass Nordic trail system, with the exception of the *Zig Zag* trail (refer to Figure 3-43). These trails are maintained, including vegetation clearing to a width of approximately 18 feet. Although this portion of the IRA is within the influence zone of concentrated public use along US 12, around Leech Lake, and in the nearby Village Inn, Kracker Barrel store and gas station, it remains relatively undeveloped. The Nordic trail is groomed with a motorized trail groomer, but the intrusion is minor and could easily be removed. As such, this IRA parcel continues to meet the criteria for inclusion in the inventory of areas with wilderness potential (USFS 1992).

Under the Wenatchee Forest Plan, the William O. Douglas Adjacent IRA within and adjacent to the White Pass SUP boundary is allocated to Administratively Withdrawn – RE-1 (Developed Recreation).

The remainder of this IRA (21,983 acres) is located outside the White Pass SUP area, along the William O. Douglas Wilderness boundary. It is currently undeveloped. Since there are no proposals for development within any portion of the IRA, it will not be discussed further.

White Pass IRA

Located to the immediate west of the White Pass Ski Area SUP area, and extending south and west to the Goat Rocks Wilderness, this IRA is comprised of the 800 acres in Hogback Basin removed from Wilderness by the Washington Wilderness Act (P.L. 98-339), as well as the portions of the Goat Rocks Addition #6036 that were not added to Wilderness. The White Pass IRA adjoins the Goat Rocks Wilderness along its southern and western boundaries (refer to Figure 1-2). Although it contains less than 5,000 contiguous acres, the 1,160-acre White Pass IRA meets the acreage exceptions for placement on the inventory of areas with wilderness potential because of its juxtaposition with the Goat Rocks wilderness boundary.

The entire IRA is undeveloped, with the exception of the PCNST that passes through a portion of the area near its southern edge. This stock and foot trail is a single tread, native surface that blends into the landscape. Natural physical and biological processes appear to be intact in the area. Within the portion of

the White Pass IRA proposed for expansion, slopes are relatively gentle, and support subalpine parkland vegetation patterned in an array of openings and tree islands. There are intermittent background views of Mt. Rainier, Pinegrass Ridge, Divide Ridge, and views from the ridge-top between the IRA and the Goat Rocks Wilderness into Miriam Basin within the Wilderness. Lifts and ski trail corridors in the adjacent White Pass Ski Area are discernible from some locations within the IRA, but do not dominate the view. Its adjacency to the Goat Rocks Wilderness to the south provides a “seamless” extension of undeveloped and pristine terrain. As a result, the White Pass IRA continues to meet the criteria for inclusion in the inventory of areas with wilderness potential (USFS 1992).

Under the Gifford Pinchot Forest Plan, the White Pass IRA is allocated to Management Area 2L – Developed Recreation Area.

3.14.4 Environmental Consequences

Alternative 1

Under Alternative 1, no new development associated with the White Pass Ski Area expansion project would occur. The permit area would continue to operate as it does currently. The status of the Goat Rocks Adjacent and White Pass IRAs with respect to their inclusion in the inventory of potential wilderness areas would remain unchanged (refer to Section 3.14.4).

Alternative 2

Goat Rocks Adjacent IRA Under Alternative 2, there would be no new development within the Goat Rocks Adjacent IRA. The characteristics of this IRA would remain unchanged beyond the existing level of development. As stated above (refer to Section 3.14.4), the 247.8-acre portion of the IRA within the White Pass SUP area no longer qualifies for placement on the inventory.

White Pass IRA Alternative 2 proposes expansion of the White Pass Ski Area into Hogback Basin, within the White Pass IRA, with two chairlifts, 15 new ski trails and a mid-mountain lodge (refer to Figure 2-2).

A total of approximately 19.6 acres of development would occur on portions of the 767-acre proposed expansion area under Alternative 2. Vegetation would be removed on approximately 19.7 acres for construction of the proposed *Basin* and *Hogback Express* chairlifts, ski trails, the mid-mountain lodge, and utility lines, leaving evidence of corridors and the use of mechanical equipment. Because some of these developments are linear, the effects would be spread across the IRA from east to west (refer to Figure 2-3). Lift towers and alignments would be obvious in the immediate foreground of the visitor. The 2,000-square foot lodge would be a permanent structure within the IRA.

Mitigation Measures would reduce impacts to the vegetation by using existing clearings to the extent possible, marking maximum trail clearing limits, felling trees away from adjacent vegetation, and limiting

maintenance techniques to manual methods within the mountain hemlock parkland community (refer to Section 3.5.3.1 Vegetation Communities). Even so, this level of development would result in the eventual removal of 767 acres (66 percent) of the White Pass IRA from the inventory of potential wilderness areas because it would no longer meet the criteria for inclusion (USFS 1992).

The remaining 393 acres of the White Pass IRA to the north is outside the proposed expansion area and would remain undeveloped. Although it would be cut off from the Goat Rocks Wilderness boundary to the south by the proposed expansion developments, this portion of the White Pass IRA is contiguous along its western boundary with the Goat Rocks Wilderness, and as such, would continue to meet the inventory criteria (USFS 1992).

Modified Alternative 4

Goat Rocks Adjacent IRA Under Modified Alternative 4, a 7-acre parking lot and a new, 400-square foot ticket booth would be developed in the eastern portion of the existing SUP area. Approximately half of the parking lot would be located within the Goat Rocks Adjacent IRA (refer to Figure 2-4), and the ticket booth might intrude as well, depending upon the final footprint. In addition, Modified Alternative 4 incorporates grading on the Holiday trail within the Goat Rocks Adjacent IRA to meet the requirements of novice terrain.

As described above, the portion of the Goat Rocks Adjacent IRA within the SUP area has already been substantially developed and no longer meets the criteria for inclusion on the inventory of potential wilderness areas (USFS 1992). Furthermore, the parking lot and ticket booth would be constructed within the influence zone of US 12. For these reasons, the trail grading and construction of the parking lot and the new ticket booth would have no effect.

White Pass IRA The development of two new lifts, 17 ski trails, the 2,000-square foot mid-mountain lodge, utilities, and water supply line or well within the 767 acres of Hogback Basin (refer to Figure 2-4) would affect the placement of the White Pass IRA on the inventory of potential wilderness areas for the same reasons described in Alternative 2, with one slight difference. Vegetation clearing for ski trails would increase to approximately 21.5 acres in the mountain hemlock parkland, a distinctive feature of the IRA. In addition, a segment of the PCNST would be relocated to the Wilderness boundary, resulting in less than half an acre of ground and vegetation disturbance. As with Alternative 2, Mitigation Measures/design criteria and Other Management Provisions (refer to Section 2.4) would reduce impacts to the natural vegetation by marking maximum trail clearing limits, felling trees away from adjacent vegetation, and limiting maintenance techniques to manual methods within the mountain hemlock parkland community (refer to Section 3.5.3.1 – Vegetation Communities). The former location of the PCNST segment would be allowed to revegetate naturally. Even so, the level of development proposed under Modified Alternative 4 would result in the eventual removal of the 767-acre Hogback Basin portion

of the White Pass IRA from the inventory of potential wilderness areas because it would no longer meet the criteria for inclusion (USFS 1992).

The effects to the remaining 393 acres of the White Pass IRA to the north would be identical to Alternative 2. There would be no development of this area, and given its juxtaposition along its western boundary with the Goat Rocks Wilderness, would continue to qualify for placement on the inventory.

Alternative 6

Goat Rocks Adjacent IRA Impacts to the Goat Rocks Adjacent IRA under Alternative 6 would be similar to those described for Modified Alternative 4, with the exception that the proposed parking lot would be reduced to 2.5 acres. This would slightly reduce the extent of clearing and grading needed within the Goat Rocks Adjacent IRA. However, as noted above, a 247.8-acre portion of the Goat Rocks Adjacent IRA within the SUP area has already been substantially developed and no longer meets the criteria for inclusion on the inventory of potential wilderness areas (USFS 1992).

White Pass IRA Alternative 6 proposes expansion of the White Pass Ski Area into approximately 282 acres within the White Pass IRA. Facilities would be scaled back as compared to Alternative 2 and Modified Alternative 4, and would include a single lift (*Basin*) with seven associated ski trails, and a utility corridor for power and communications. The utility corridor would be trenched into the proposed ski trail clearings and into the proposed 0.25 mile of road that would be constructed within the White Pass IRA (refer to Figure 2-6 for location of the developments, including the proposed road).⁵² Motorized use would occur on the proposed road during construction and maintenance activities.

The mid-mountain lodge would be located within the existing White Pass SUP area rather than in the proposed expansion area, eliminating the impacts of clearing and construction for this permanent structure within the IRA. The proposed developments would affect about one-third of the acreage in the White Pass IRA that is proposed for expansion under either Alternative 2 or Modified Alternative 4, and the same visual screening evident in Alternative 2 and Modified Alternative 4 would apply in Alternative 6. However, the effects of the clearing and some grading on approximately 15.3 acres would leave evidence of the use of mechanical equipment, and the lift towers and their alignment would be obvious in the immediate foreground of the visitor.

Development within approximately 282 acres in the White Pass IRA would introduce landscape alterations as well as a segment of road. This area could no longer be managed in an essentially natural,

⁵² The road would include approximately 0.25 mile inside the White Pass IRA, which is also in a Tier II Key Watershed. In order for the Decision-makers to select this road and for the road to be constructed, the Regional Executive Interagency Committee would have to formally determine the construction of such a road would be consistent with the Aquatic Conservation Strategy, as outlined in the Northwest Forest Plan (USDA and USDI 1994). If the Roadless Area Conservation Rule is formally implemented, this road would not be allowed in the White Pass IRA, therefore construction techniques (as described in the other Action Alternatives) would be implemented.

unimpaired condition and would no longer be considered unroaded. For these reasons, this portion of the White Pass IRA would no longer meet the criteria for placement on the inventory of areas with wilderness potential (USFS 1992).

There would be no development within the approximately 878 remaining acres of the IRA, including much of Hogback Basin. Because it is bordered on two sides by Wilderness, it would be possible to continue to manage this portion of the White Pass IRA in a natural, unaltered condition that would connect seamlessly with the adjacent Wilderness. It would continue to meet the criteria for placement on the inventory of potential wilderness areas (USFS 1992).

Alternative 9

Goat Rocks Adjacent IRA There would be additional development within the 247.8-acre portion of the Goat Rocks Adjacent IRA that is within the existing SUP area. This would include construction of the new *PCT* chairlift, clearing and some grading for seven new ski trails, trenching of utilities into existing roads and trails, and rerouting of a short segment (225 feet) of the PCNST. The new 2.5 acre-parking area and ticket booth would be developed to the north and outside of the IRA boundary.

The development of the *PCT* chairlift and associated ski trails in the Goat Rocks Adjacent IRA would further degrade the roadless character of the 247.8-acre portion of the IRA within the White Pass SUP boundary. Because the vegetation here is densely-spaced, mixed conifers, full clearing with some grading would be required. The impacts of this would be evident, since trees could not be retained and a majority of the understory vegetation would be removed on approximately 35.3 acres of mixed conifer vegetation communities. The lift towers and their alignment would remain obvious developments within the IRA. However, for the reasons described under Modified Alternative 4, that portion of the Goat Rocks Adjacent IRA within the SUP area is substantially developed and no longer meets the criteria for inclusion on the inventory of potential wilderness areas (USFS 1992).

White Pass IRA Alternative 9 proposes no developments within any portion of the 1,160-acre White Pass IRA. Its roadless characteristics as described under the existing condition would remain unaltered. The White Pass IRA would continue to meet the criteria for placement on the inventory as a potential wilderness area (USFS 1992).

Tables 3.14 FEIS1 and 3.14 FEIS2 summarize the level of development that would occur in the Goat Rocks Adjacent IRA and the White Pass IRA under each alternative (current developments are reflected in the No Action Alternative 1 for comparison).

**Table 3.14 FEIS1:
 Goat Rocks Adjacent IRA Inventoried Acres (within the SUP area)**

Characteristic	Alt. 1 (Existing)	Alt. 2	Mod. Alt. 4	Alt. 6	Alt. 9
Number of Lifts	0	0	0	0	1
Number of Ski Trails	17	17	17	17	24
Acres of existing trails/ trails to be cleared	66.2	0	1.29	0	26.28
Number of Buildings	0	0	0	0	0
Acres of all other existing cleared area/clearing	6.1	0	1.71	0.02	0.14
Road length	12,375 ft	12,375 ft	12,375 ft	12,375 ft	12,375 ft
Total Acres Affected	72.3	0	3.00	0.02	26.41
Net Qualifying Acres ^a	0	0	0	0	0

^a Net Qualifying Acres represents the area of the IRA that is not common with a proposed SUP expansion area.
 Example: IRA - ProSUP = X

**Table 3.14 FEIS2:
 White Pass IRA Inventoried Acres**

Characteristic	Alt. 1 (Existing)	Alt. 2	Mod. Alt. 4	Alt. 6	Alt. 9
Number of Lifts	0	2	2	1	0
Number of Ski Trails	0	15	18	7	0
Acres of existing trails /trails to be cleared	0	16.53	19.39	8.35	0
Number of Buildings	0	1	1	0	0
Acres of all other existing cleared area/clearing	0	3.08	3.72	2.61	0
Road length	0	0	0	1,705 ft	0
Total Acres Affected	0	19.60	23.11	10.96	0
Net Qualifying Acres ^a	1,383.78	372.11	372.11	893.09	1,383.78

^a Net Qualifying Acres represents the area of the IRA that is not common with a proposed SUP expansion area.
 Example: IRA - ProSUP = X

3.14.5 Cumulative Effects

No past, present or reasonably foreseeable projects have been identified that would result in impacts to IRAs within the White Pass Study Area. For a description of project actions, refer to Tables 3.0-FEIS1 and 3.0-FEIS2 in Section 3.0.

Over recent history, the most visible effect on IRAs has been the outcome of the 1984 Washington Wilderness Act, which designated the William O. Douglas Wilderness, expanded the Goat Rocks Wilderness, and withdrew from Wilderness 800 acres in Hogback Basin, now included in the White Pass

IRA. This change has been included in the existing condition for this analysis. The White Pass expansion would affect the White Pass and Goat Rocks IRAs and the potential for wilderness designation as described in Section 3.14.4. Other than the impacts of the White Pass expansion, no cumulative effects would result from the past, present and reasonably foreseeable projects listed in Tables 3.0-FEIS1 and 3.0-FEIS2.