



October 26, 2009

Tom Tidwell, Chief  
USDA Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250

Dear Chief Tidwell:

On behalf of The Wilderness Society, our 500,000 members and supporters nationwide, and the undersigned organizations and their members and supporters, we are writing to request that you take immediate action to protect the wilderness values of agency-recommended wilderness by issuing a guidance letter that makes clear that forest units must not designate routes for motorized or mechanized vehicle use in agency-recommended wilderness.

As you know, the Forest Service is in the midst of an ambitious and important effort to complete travel management plans for each national forest under the Travel Management Rule of 2005. This far-reaching effort provides a unique opportunity to ensure that the wilderness values of agency-recommended wilderness areas are adequately protected.

In addition to this nation-wide planning effort, the agency constantly makes decisions on any number of projects that are often much smaller than a ranger district that threaten to undermine the maintenance of wilderness characteristics. The opportunity exists to ensure that the wilderness values of

agency recommended wilderness areas are adequately protected under all types of projects.

Management decisions that allow motorized or mechanized travel in areas recommended for Wilderness in Land and Resource Management Plans (LRMPs) can result in damage to the Wilderness potential of these areas. This is a serious concern given that current Forest Service Manual (FSM) direction requires that the Forest Service manage recommended Wilderness so as not to reduce Wilderness potential or compromise Wilderness values. Specifically, this direction states:

“Any inventoried roadless area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of the area. Activities currently permitted may continue pending designation, if the activities do not compromise the wilderness values of the area.”<sup>1</sup>

Unfortunately, we have observed a lack of consistency between regions regarding how this FSM direction is being interpreted and implemented, leading to broad differences and internal contradictions in management approaches. As Region 1 has noted, some recommended wilderness areas are “managed by more than one unit and the units have different management approaches, particularly for motorized recreation. This results in public confusion and can result in encroachments of illegal activities on to the adjacent forest.”<sup>2</sup>

About half the regions have issued internal instructions to their forests regarding the management of recommended wilderness, much of which conflicts. At least one region has provided instruction to eliminate motorized or mechanized use. Another has provided instruction not to eliminate such use. A summary of the regional approaches is included in Appendix A.

Not only has the lack of national guidance on the matter resulted in inconsistency across agency decision making, but the lack of guidance has facilitated authorization of uses in recommended wilderness areas that can reduce an area’s wilderness potential and compromise an area’s wilderness values. For example, the Kootenai National Forest in Region 1 recently issued a scoping notice for a travel management project on the Fortine Ranger District, in which the forest has proposed to designate snowmobile use inside Recommended Wilderness. Both the Payette and the Salmon-Challis National Forests in Region 4 recently released their travel management plan decisions,

---

<sup>1</sup> FSM 1923.03.

<sup>2</sup> Consistency in Land and Resource Management Plans, U.S.F.S. Region One, 8/25/2008.

wherein they designated motorized use in several recommended wilderness areas. Meanwhile, the Boise National Forest, also in Region 4, is proposing to retain motorized use in portions of three roadless areas that have been found suitable for wilderness.

As described below, the continued and expanding use of motorized and mechanized vehicles both reduces an area's wilderness potential and compromises an area's wilderness values. These impacts, combined with the lack of clear national guidance, demands that the agency provide immediate direction to all Regions on managing recommended wilderness.

### **Reducing wilderness potential**

Allowing motorized and mechanized vehicle use in agency-recommended wilderness develops a constituency for the continuation of that use. This constituency becomes stronger and with a greater sense of entitlement, the longer the use is allowed. This creates unnecessary conflicts which agency staff must spend time trying to manage, lessening the time available for other important work. It also contradicts agency direction to minimize conflicts, specifically:

"In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: ... (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands."<sup>3</sup>

This use can also result in outright reduction of the wilderness potential of an area which FSM direction specifically disallows. In addition, the mere presence of the use has resulted in areas no longer being seriously considered for designation, in itself a de facto reduction.

"The increase in vehicle capability, numbers, and local use, puts areas of recommended wilderness at far greater risk of degradation and loss of wilderness character than they were when the Forest Plan was written. In addition, other areas recommended for wilderness have not received serious consideration for designation once motorized use has become established."<sup>4</sup>

In response, Congress is far less likely to designate an area as wilderness that contains long-established motorized or mechanized vehicle use, regardless

---

<sup>3</sup> 36 CFR 212.55(b)

<sup>4</sup> Clearwater NF Travel Management Draft Environmental Impact Statement, pages 3-83 and 84.

of whether the agency has recommended the area for wilderness designation or not.

A recent example of this was the proposed additions to the Hoover Wilderness in California. Despite a long-standing recommendation for wilderness designation, the Forest Service continued to allow winter motorized recreation throughout much of the area. As a result, Congress designated only a portion of the area for wilderness, while designating another portion a winter recreation area, which is primarily for motorized vehicle use.<sup>5</sup> The agency's management of its recommended wilderness directly undermined its own recommendations and reduced the potential for wilderness designation.

### **Compromising wilderness values**

Continued and expanding motorized and mechanized vehicle use compromises wilderness values by:

- *Diminishing opportunities for solitude.*

As motorized and mechanized vehicle use increases, opportunities for solitude decline. Stronger vehicles are able to push farther and farther into undeveloped areas. Further, the number of vehicles continues to expand, making it increasingly difficult to escape the sights and sounds of motors in recommended wilderness areas.

As the Clearwater National Forest in Idaho recently observed in its draft travel management plan:

“As motorized technology continues to be developed levels of access into remote, back-country locations will rise and with this increased use will come additional noise and disturbance which adversely affects attributes of wilderness character.”<sup>6</sup>

- *Degrading an area's naturalness.*

Motorized and mechanized vehicles cause an array of impacts on natural systems, including wildlife and their habitat, air and water quality, the introduction of non-native plant species, and damage to vegetation. Noise from motors disturbs wildlife and can impact opportunities for roosting, foraging, and nesting. Off-route travel and poorly cited motorized routes in areas important for wildlife can easily degrade habitat for an array of species by dividing an area of relatively continuous habitat into smaller, disconnected parcels. Motorized vehicles degrade water quality

---

<sup>5</sup> See PL 111-11, section 1806.

<sup>6</sup> Clearwater National Forest, Travel Planning Draft Environmental Impact Statement, p. 3-83.

by causing increase sedimentation and erosion, and through direct and indirect deposits of pollutants. Roads and trails serve as corridors for non-native invasions, and ORVs are frequently cited as the key link in the transport and spread of invasive or noxious plants. The force of rolling wheels under the weight of an ORV easily damages and crushes shrubs, grasses, forbs, and other vegetation. Each of these impacts degrades an area's naturalness.

- *Diminishing opportunities for primitive recreation.*

Opportunities for hiking, hunting, fishing, camping, horseback riding, and cross-country skiing are diminished by the presence of motorized and mechanized vehicles. Vehicles can scare wildlife, leading to degraded hunting opportunities. Trail conflicts between motorized/mechanized vehicles and hikers, horseback riders, and skiers degrade the primitive recreation experience. Engine noise stemming from motorized vehicles propagates widely across the landscape, which can disrupt and even spoil the primitive, backcountry experience sought by many non-motorized users.

- *Adversely affecting an area's undeveloped character.*

Routes maintained for motorized and mechanized vehicles often require more expansive maintenance than those maintained for foot and horse travel. Brush clearing utilizing motorized equipment, hardened water crossings, water bars, and bridges are but a few of the impacts often necessary for motorized and mechanized vehicle routes. These modifications diminish an area's undeveloped character and instead show forms of human presence and use.

The Clearwater National Forest recently reevaluated the wilderness character of areas recommended for wilderness in 1978. The wilderness character of half of the areas was degraded in the intervening years, simply by the continued and expanded use of motorized and mechanized vehicles.<sup>7</sup> The wilderness characteristics of numerous other agency-recommended wilderness areas are no doubt suffering similar declines, which the agency itself acknowledges.<sup>8</sup> Region One notes that:

"In some areas, uses have changed or certain types of use have increased significantly, possibly degrading wilderness characteristics. In most cases, use has not been monitored closely enough, if at all, to make a call on how use has changed over the years."

---

<sup>7</sup> Id. p. 3-81-82.

<sup>8</sup> Consistency in Land and Resource Management Plans, USDA FS Region One, 8/25/2008

This situation demands immediate attention. We understand that the agency may soon revise its policies regarding wilderness management and planning. However, these policy revisions will likely not be completed in time to affect the current travel management planning effort or a number of site-specific projects currently under consideration. Meanwhile, due to the lack of national guidance establishing a uniform approach that agency-recommended Wilderness areas be managed solely for uses compatible with Wilderness designation, management decisions may be locking in motorized and mechanized vehicle use within recommended wilderness areas across the country. Such decisions would be difficult to reverse, and the wilderness characteristics of agency-recommended wilderness areas may be degraded as a result.

We believe that immediate guidance is needed to ensure that travel management decisions adequately protect the wilderness values of agency-recommended wilderness. We ask that you provide immediate guidance nationwide establishing a uniform approach that makes clear that that agency recommended wilderness areas are to be managed solely for Wilderness compatible uses and that all management decisions must exclude motorized and mechanized vehicles from agency-recommended wilderness.

This guidance would be consistent with the FSM, and would ensure that land managers interpret the manual's direction to preserve wilderness character of agency-recommended wilderness in a consistent manner. As one Forest Service regional office noted: "There has been some confusion over how wilderness characteristics are defined and what activities or what level of use would result in degradation of wilderness characteristics."<sup>9</sup>

---

<sup>9</sup> Consistency in Land and Resource Management Plans, U.S.F.S. Region One, 8/25/2008.

Immediate guidance on managing recommended wilderness is essential to preserving the wilderness character of recommended wilderness areas, preventing the reduction of wilderness potential, ensuring consistency among forests and regions, and minimizing public confusion. We hope you will consider issuing such guidance as soon as possible.

Thank you for considering our views. We look forward to your prompt response.

Sincerely,

## Appendix A

### REGIONAL APPROACHES TO MANAGING RECREATION IN AGENCY-RECOMMENDED WILDERNESS AREAS

REGION	GUIDANCE	APPROACH
1	Regional Forester guidance	Eliminate motorized or mechanized recreation through travel management plans, or adjust boundary of area to eliminate established use.
2	"Standing policy"	Not allow or "phase-out" non-conforming uses in recommended wilderness.
3	Guidance for Forest Plan revision <sup>10</sup>	
4	Guidance for Forest Plan revision	Motorized or mechanical transport is allowed if they do not compromise the wilderness values of the area. Maintain existing ROS classifications or change toward a more primitive classification.
5	None	
6	None	
8	None	
9	None	
10	None <sup>11</sup>	

<sup>10</sup> Region 3 has issued guidance on travel management planning which prevents designating routes for motor vehicle use in primitive areas, but does not address recommended wilderness. Forest Service Region 3, Travel Management Rule Guidelines, June 30, 2008.

<sup>11</sup> Region 10 has issued Manual Supplement direction R-10 2300-2003-2, which deals with wilderness management, but does not address planning for recommended wilderness.