Wilderness Inventory and Evaluation
in National Forest Planning:
An Analysis of Early Implementation
of the 2012 Planning Rule

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I. Introduction

This report examines the various methods that the Forest Service is using in its most recent forest plan revisions under the 2012 Planning Rule to inventory and evaluate lands that may be suitable for wilderness designation. The report focuses on seven “early adopter” national forests – the Flathead in Montana (Region 1); the Cibola in New Mexico (Region 3); the Sierra, Sequoia, and Inyo in California (Region 5); the Nantahala-Pisgah in North Carolina (Region 8); and the Nez Perce-Clearwater in Idaho (Region 1).

Each of these national forests is revising its land and resource management plan pursuant to the new Forest Planning Rule that was adopted in 2012. The 2012 Planning Rule requires the Forest Service during plan revisions to “[i]dentify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.”

Specific guidance for wilderness inventory and evaluation is contained in the wilderness evaluation section (Forest Service Handbook 1909.12, Chapter 70) of the Forest Service’s planning directives. The Forest Service recently updated those directives, including Chapter 70. Draft directives were released for public comment in February 2013, and a Federal Advisory Committee submitted official recommendations on the draft directives in November 2013. Final directives were adopted on January 30, 2015, and published in the Federal Register on February 6, 2015.

During the period between promulgating the 2012 Planning Rule and adopting the final directives, the previous Chapter 70 (last updated in 2007) technically remained in effect. The Forest Service allowed the early adopter national forests to use the 2013 draft directives, with consideration of the Federal Advisory Committee’s recommendations, to conduct the wilderness inventory and evaluation as a good faith effort to meet the requirements of the planning rule in anticipation of the new directives. Thus, the early adopter forests have used a range of inventory and evaluation criteria.

The purpose of this report is to describe the wilderness inventory and evaluation methods, concepts, and approaches used by the early adopter forests, as well as to offer recommendations at this early stage in the process that can be applied immediately to improve the Chapter 70 process. Because none of the seven early adopter forests has completed the entire wilderness evaluation process, a comprehensive assessment is not yet possible. However, all of them have begun the process and have produced enough results to allow some preliminary analysis of their experiences to date.

The report begins with background information about the legal framework and historical evolution of the wilderness evaluation process in Forest Service planning. Next, it provides an overview of the four-step process required by Chapter 70, emphasizing the initial inventory and evaluation steps examined in this report. Then, the report evaluates how the seven early adopter

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1 36 C.F.R. § 219.7(c)(2)(v).
national forests have interpreted and applied the Chapter 70 guidance. The report concludes with overall observations about the case studies and presents recommendations to improve the efficiency and effectiveness of the wilderness evaluation process.

II. Background

A. Historical and Legal Framework

1. 20th Century

Wilderness inventory and evaluation has long been an integral part of the Forest Service’s land management planning process. The Forest Service completed its first inventory of national forest “primitive areas” in the 1920s and began to administratively designate “wilderness” and “wild” areas in 1935. The Wilderness Act of 1964 established the National Wilderness Preservation System and set the course for future wilderness area designations by Congress. The Forest Service conducted two Roadless Area Review and Evaluation (RARE) processes in the 1970s to identify possible wilderness areas.

The National Forest Management Act of 1976 (NFMA) required the Forest Service to adopt and periodically revise management plans for all national forests and to consider the wilderness resource during the forest planning process. Subsequently, the Department of Agriculture adopted regulations in 1979 and 1982 to implement the NFMA that included a wilderness inventory and evaluation process. The Forest Service developed a detailed Land Management Planning Handbook to implement the 1982 planning rule, including a separate chapter on Wilderness Evaluation.

In 1984, Congress passed numerous national forest wilderness bills for individual states, primarily based on the Forest Service’s RARE II wilderness recommendations. Roadless areas that were not designated wilderness were typically “released” to the forest planning processes. Those wilderness bills generally deemed the RARE II evaluation to be legally adequate and excused the Forest Service from conducting additional wilderness evaluations during the first round of forest planning. However, the bills required the Forest Service to evaluate potential wilderness areas when the relevant forest plans were revised. Congress did not pass RARE II wilderness bills for some states, such as Idaho and Montana; in those states the Forest Service conducted wilderness evaluations as part of the initial development of NFMA forest plans.

Wilderness recommendations and roadless area management often were contentious issues in the first round of forest plans. The Wilderness Society and others faulted the forest plans for not providing adequate wilderness recommendations or roadless area protection. Some critics charged that the Forest Service took a “black box” approach toward wilderness evaluations and

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4 16 U.S.C. § 1604(a) & (e)(1).
used inappropriate criteria, such as external “sights and sounds,” to disqualify areas from consideration.

In 1999, under instructions from President Clinton, the Forest Service began a rulemaking process to protect the remaining national forest roadless areas. As part of that regulatory process, the Forest Service identified 58.5 million acres of Inventoried Roadless Areas (IRAs) that had been previously identified during RARE II or subsequent forest planning. The final Roadless Area Conservation Rule (Roadless Rule) protected all of the IRAs from most road construction and commercial logging. The Roadless Rule did not directly affect the wilderness evaluation process in forest planning, but it did specify that the Rule’s prohibitions and restrictions could not be changed by forest plans.

2. 21st Century

In 2000, the Clinton Administration adopted new NFMA regulations to guide the revision of forest plans; however, the Bush Administration quickly suspended implementation of the new regulations. In 2005, the Bush Administration adopted a different set of forest planning regulations. Conservation groups went to court and succeeded in blocking implementation of the Bush regulations. A second attempt by the Bush Administration to adopt regulations in 2007 was also enjoined. Nevertheless, in 2007 the Forest Service revised portions of Chapter 70 and other parts of the forest planning directives. National forests that had begun to revise their forest plans based on the Bush regulations either continued under the 1982 regulations or postponed planning until the new planning rule was adopted in 2012.

Also under the Bush Administration, the Forest Service attempted to repeal the national Roadless Rule and replace it with a voluntary state petition process. The repeal effort was invalidated by the courts, but state-specific roadless area rules were eventually adopted for national forest lands in Idaho and Colorado. Like the national Roadless Rule, the roadless area management requirements in the Idaho and Colorado roadless rules cannot be changed through the local national forest planning process.

In 2009, the Obama Administration began a new NFMA rulemaking process. After extensive public involvement and environmental analysis, a final planning rule was adopted in May 2012. The Secretary of Agriculture subsequently appointed a 21-member committee, pursuant to the Federal Advisory Committee Act (FACA), to advise the Forest Service on implementing the 2012 Planning Rule. In February 2013, the Forest Service issued draft directives to implement the 2012 planning rule. The FACA Committee evaluated the draft directives and prepared recommended changes, which were presented to the Department of Agriculture and the Forest Service in November 2013. Final directives were adopted on January 30, 2015.

During this period, the Forest Service was also taking steps to limit the impacts of roads and unregulated off-road vehicle (ORV) use in the national forests. First, each national forest adopted a Travel Management Plan that designated a system of roads, trails, and areas for public motor vehicle use and displayed these designations on Motor Vehicle Use Maps (MVUMs). Second, each national forest began a Travel Analysis Process to evaluate the risks, benefits, and costs associated with the agency’s vast road system and identify roads that are “likely not needed” for
future use. By early 2015, the ORV route designations and MVUMs were mostly completed, but only a few national forests had finished their Travel Analysis Reports identifying unneeded roads.

B. Evolution of Wilderness Evaluation Process

1. RARE and 1982 Planning Rule

The Forest Service’s wilderness evaluation methods and procedures have gradually evolved over the past several decades. During the RARE process in the 1970s, the Forest Service developed a Wilderness Attribute Rating System (WARS). The system utilized four factors derived from the Wilderness Act – naturalness, apparent naturalness, opportunity for solitude, and opportunity for a primitive recreation experience. All roadless areas were assigned a numerical rating between one and seven for each factor, along with a total WARS score.

The 1982 planning rule required the Forest Service to evaluate roadless areas and consider them for recommendation as potential wilderness areas. The roadless areas to be evaluated included the RARE II areas that were still unroaded and any other essentially roadless areas. The inventory was also to cover unroaded areas less than 5,000 acres in size that were contiguous to existing or proposed wilderness areas or contiguous to roadless areas on other federal lands. The 1982 rule required the Forest Service to evaluate each roadless area and determine “significant resource issues” based on several factors, including wilderness values, other values foregone, management feasibility, proximity to designated wilderness, and long-term changes in species diversity.

2. Early Planning Directives

The Forest Service’s planning directives provided important detail to the roadless area inventory and evaluation process required by the 1982 rule. For example, the directives specified that the roadless area inventory should only include areas that do not contain “improved roads maintained for travel by standard passenger-type vehicles.” However, in the eastern national forests, areas could include as much as one-half mile of improved roads per 1,000 acres.

In addition, the planning directives divided the evaluation process into three parts: capability, availability, and need. The capability evaluation addressed a wide array of wilderness values, including opportunities for solitude, degree of disturbance, primitive and unconfined recreation, presence of wilderness-associated species, scientific and educational opportunities, adventure and challenge, and special features. Capability also addressed an area’s manageability as wilderness, such as presence of private inholdings, cabins and other structures, or ongoing management activities. Evaluation of non-conforming uses and structures was more lenient in the eastern national forests than in the West.

Evaluation of availability was essentially a trade-off analysis between an area’s wilderness values versus the area’s ability and need to produce other resource values. For example, areas with highly valuable mineral or timber resources, or potential for downhill skiing development, were generally considered unavailable for wilderness.
The evaluation of need considered an area’s potential to contribute to the national and local distribution of wilderness. Factors considered included distance from population centers and designated wilderness areas, ecological representation, visitor pressure and use trends, and presence of other lands in the vicinity to provide primitive recreational opportunities.

Wilderness advocates frequently criticized the Forest Service’s three-part wilderness evaluation system as biased against wilderness recommendations. For example, some highly suitable areas were not recommended for wilderness because they contained commercially valuable timber (not available) or were located near other designated wilderness (no need).

The Forest Service made some changes to the wilderness evaluation planning directives in 2007. For example, the directives broadened the types of roads that can disqualify areas from the wilderness inventory. Instead of using the traditional, relatively narrow standard of “improved roads maintained for travel by standard passenger-type vehicles,” the 2007 directives instructed planners to eliminate areas that contained any “forest road” – a considerably broader standard which included even closed roads. The 2007 directives did not change the three-part evaluation system.

3. 2012 Rule and 2015 Directives

The 2012 Forest Planning Rule describes the process that the Forest Service must follow whenever it revises a forest plan. The process begins with a rapid Assessment of available and relevant information concerning 15 topics. One required Assessment topic is the condition of wilderness and other designated areas and the opportunity and need for additional designated areas. After the Assessment is complete, the Forest Service develops a Need for Change statement and issues a preliminary Proposed Action along with a Notice of Intent to prepare an environmental impact statement (EIS) for the plan revision. The draft EIS identifies and analyzes the agency’s preferred alternative along with a range of other alternatives. The plan revision process concludes with the release of a final plan and EIS, the resolution of any objections to the plan, and the signing of a Record of Decision by the Forest Supervisor.

The 2012 Forest Planning Rule is much more succinct than the 1982 Rule in its direction regarding wilderness inventory and evaluation. The 2012 Rule simply states that forest plan revisions must “[i]dentify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.”

Chapter 70 of the 2015 directives (Forest Service Handbook (FSH) 1909.12) makes numerous changes to the agency’s wilderness inventory and evaluation system. For instance, the new directives utilize the Forest Service road maintenance classification system to determine whether a particular road can disqualify an area from the wilderness inventory. Roads that are closed (Maintenance Level (ML) 1) do not disqualify an area from the inventory, while open roads

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6 36 C.F.R. § 219.6(b)(15).
7 36 C.F.R. § 219.7(c)(2)(v).
maintained to relatively high standards (ML 3, 4, and 5) do disqualify an area from the inventory. Areas with open roads maintained for high-clearance vehicles (ML 2) are generally excluded from the inventory but with certain exceptions. Inventory criteria are mostly the same for both eastern and western national forests.

The 2015 directives also simplify the wilderness evaluation process. Rather than evaluating the capability, availability, and need for each area, the new directives limit the evaluation to the area’s wilderness values (capability). Availability analysis takes place as part of the comparison of alternatives in the forest plan EIS, while consideration of need for additional wilderness or other designated areas occurs during the Assessment phase of the planning process, separate from the Chapter 70 wilderness evaluation.

III. Chapter 70 Overview

Following is a brief summary of the wilderness inventory and evaluation process described in Chapter 70 of the 2015 directives (FSH 1909.12).

Chapter 70 outlines a four-step planning process in the following sequence: (1) an inventory of areas that may be suitable for wilderness, (2) an evaluation of each area’s wilderness values, (3) analysis of alternative wilderness recommendations as part of the forest plan EIS, and (4) a decision by the Forest Supervisor about which areas, if any, to recommend for wilderness designation.8 The Forest Service must provide opportunities for public participation at each step of the process.9

A. Inventory

The Chapter 70 process begins with an inventory of all lands that may have wilderness characteristics, based on a common set of inventory criteria and additional information generated during the Assessment phase of the plan revision. The inventory should start by considering relevant, existing information about roadless areas, road conditions, etc.10 Each inventoried area should be documented and mapped to facilitate public review and input.11 The principal inventory criteria are the area’s size and the absence of roads or other improvements; however, the Forest Service can add other areas to the inventory based on information received during public participation, such as areas proposed through previous planning, collaborative effort, or pending legislation.12

1. Size

In order to qualify for the wilderness inventory, an area must either be at least 5,000 acres in size or smaller than 5,000 acres but “of sufficient size as to make practicable its preservation and use

8 FSH 1909.12 § 70.62.
9 § 70.61.
10 § 71.1.
11 § 71.3.
12 § 71.2.
in an unimpaired condition.”¹³ Smaller undeveloped areas should also be included in the inventory if they are “contiguous to an existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventory of other Federal ownership.”¹⁴

2. Road Improvements

Unlike past versions of Chapter 70, the 2015 directives rely on the Forest Service’s Road Maintenance Level classification system to help determine what types of roads will disqualify an area from the wilderness inventory. All forest roads are assigned a Maintenance Level (ML) number between 1 and 5.¹⁵

- ML 1 roads are closed and have been placed in storage for potential future use, with only basic custodial maintenance performed to prevent resource damage.
- ML 2 roads are open for use by high clearance vehicles, but passenger cars are either prohibited or discouraged.
- ML 3-5 roads are open and designed for passenger cars, with varying road widths and surfaces.

The inventory criteria for road improvements in the 2015 directives do not disqualify an area from the inventory if it only includes ML 1 roads (closed).¹⁶ On the other hand, areas with ML 3-5 roads (open for passenger vehicles) are automatically excluded from the inventory.¹⁷ Areas with ML 2 roads (open for high-clearance vehicles) are generally excluded from the inventory, but with several exceptions, such as:

- Roads that are identified for decommissioning in a previous decision document, or identified as “likely unneeded” in a travel management plan or travel analysis.¹⁸
- Roads that will be reclassified as ML 1 through a previous decision document, or as identified in a travel management plan or travel analysis.¹⁹
- ML 2 roads in the eastern national forests that are identified as closed to motor vehicles yearlong in a previous decision document, travel management plan, or travel analysis.²⁰
- Roads in areas that have previously been recommended for wilderness by the Forest Service, or areas “that the Responsible Official merits for inclusion in the inventory that were proposed for consideration through public involvement” during the planning process.²¹
- Historical wagon or mining routes.²²

ML 2 roads that do not fit into any of the above categories will disqualify an area from the wilderness inventory if the roads meet at least one of the following criteria:²³

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¹³ § 71.21.
¹⁴ § 71.21.
¹⁵ § 70.2.
¹⁶ § 71.22a(1)(a).
¹⁷ § 71.22a(2)(b).
¹⁸ § 71.22a(1)(b).
¹⁹ § 71.22a(1)(c).
²⁰ § 71.22a(1)(d).
²¹ § 71.22a(1)(e).
²² § 71.22a(1)(f).
• The roads “[h]ave been improved and are maintained by mechanical means to ensure relatively regular and continuous use.”
• The roads “[h]ave cumulatively degraded wilderness character.”
• The roads “[h]ave been identified for continued public access and use in a project level or travel planning decision supported by NEPA analysis.”
• The roads otherwise preclude evaluation and consideration of areas for wilderness based on Assessment information or on-the-ground knowledge.

3. Other Improvements

The 2015 directives list a dozen types of improvements that may or may not disqualify an area from the wilderness inventory. Consistent with the Wilderness Act’s definition of wilderness, the directives allow some human impacts – such as logging, mining, and range improvements – so long as they are “not substantially noticeable.” The directives make clear that sights and sounds coming from outside an area should not disqualify the area from the inventory. In addition, the directives allow otherwise non-conforming improvements in areas that have previously been recommended for wilderness by the Forest Service, or in areas “that the Responsible Official merits for inclusion in the inventory that were proposed for consideration through public involvement” during the planning process.

B. Evaluation

The primary function of the evaluation step is to comprehensively examine the wilderness characteristics of each area identified during the inventory process. The 2015 directives require planners to evaluate the degree to which each area meets the following four suitability criteria, which are based on the Wilderness Act’s definition of wilderness:

• Does the area “generally appear[] to be affected primarily by the forces of nature, with the imprints of man’s work substantially unnoticeable?” The evaluation should consider such factors as the extent to which ecological conditions and man-made improvements are a departure from “apparent naturalness.”
• Does the area have “outstanding opportunities for solitude or for a primitive and unconfined type of recreation?” Solitude factors that can be considered include topography, distance from impacts, and “pervasive sights and sounds” from outside the area. Recreation factors may include opportunities for activities such as wildlife observation, hiking, hunting, camping, and enjoying nature.
• Does the area also “contain ecological, geological, or other features of scientific, educational, scenic, or historical value?” While not required for wilderness recommendation, these values may include rare plant or animal communities, outstanding landscape features, and high quality water resources.

23 § 71.22a(2)(c).
24 § 71.22b.
25 § 71.22b(10).
26 § 71.22b(12).
27 § 72.1(1).
28 § 72.1(2).
29 § 72.1(4).
• Can the area be managed to preserve its wilderness characteristics? Factors to consider include the area’s shape, legally established rights, and presence of non-federal land.\textsuperscript{30}

The evaluation must be documented so it “is transparent and accessible to the public for input and feedback.”\textsuperscript{31} Not all areas evaluated are required to be carried forward to the next step in the process (NEPA analysis); however, the Forest Service must explain the reason for excluding any evaluated areas (or portions of those areas) from further analysis.\textsuperscript{32}

C. Analysis

Areas in the wilderness inventory and evaluation (or portions of those areas) that the Forest Service decides to carry forward into the National Environmental Policy Act (NEPA) analysis stage will be included in one or more alternatives in the EIS for the plan revision.\textsuperscript{33} The EIS will include at least the following information about each area:

• Name and acreage
• Recommended wilderness boundary
• General geography, topography, and vegetation
• Current uses and management
• Wilderness characteristics and manageability
• Summary of the factors and process used to evaluate the area

D. Recommendation

The Forest Supervisor will decide which areas, if any, to recommend for wilderness designation based on the analysis in the EIS and on public input.\textsuperscript{34} The Record of Decision will summarize the information from the analysis about the recommended wilderness area(s). The ROD will also briefly describe the management direction provided for inventoried areas that are not recommended for wilderness.

IV. Case Studies

A. Flathead National Forest, Montana (Region 1)

Located in northwestern Montana, the Flathead National Forest (FNF) is blessed with abundant wilderness lands and values. The 2.4 million-acre FNF contains over one million acres of designated wilderness and more than half a million acres of lands that may be suitable for wilderness. The Flathead initiated its plan revision in November 2013 and began the wilderness inventory in March 2014.

\textsuperscript{30} § 72.1(5).
\textsuperscript{31} § 72.2.
\textsuperscript{32} § 73.
\textsuperscript{33} § 73.
\textsuperscript{34} § 74.
The FNF has a webpage\footnote{http://www.fs.usda.gov/detailfull/flathead/home/?cid=stelprd3811190&width=full} devoted to the wilderness inventory and evaluation process. The webpage summarizes the Chapter 70 evaluation process and describes the status of the process. It also provides ready access to the inventory maps and documents that explain the agency’s methodology.

1. Inventory

Early public involvement in the wilderness inventory process included a briefing and videoconference in March 2014 for staff of the Montana Wilderness Association and The Wilderness Society. In May 2014, the FNF released a preliminary wilderness inventory along with a draft “process paper” describing how the inventory was conducted. The preliminary wilderness inventory identified 21 areas, ranging in size from 352,165 acres to 228 acres. The total inventory of 620,427 acres was 141,000 acres (29%) more than the Flathead’s 479,000 acres of IRAs.

The Flathead’s wilderness inventory process paper contained an appendix devoted to the issue of how to determine whether old clearcuts were “substantially unnoticeable.” An interdisciplinary team, including a landscape architect, analyzed the visual impact of clearcuts at various ages and concluded that 40 years was a reasonable cut-off point – i.e. clearcuts older than 40 years were considered substantially unnoticeable.

The FNF planners posted an interactive map of the preliminary wilderness inventory on the Flathead website for 45 days of public review and comment. The Forest Service received 16 comment letters.

In August 2014, the Flathead released its final wilderness inventory, totaling 644,847 acres. The final inventory added 8,800 acres in response to public comment that the draft inventory erroneously omitted some areas where post-1974 logging had become substantially unnoticeable due to fire impacts. In response to public comment, the FNF also added most, but not all, of the Sullivan Creek area, which had been included in previous Montana wilderness bills. The Forest Service used Google Earth to help assess the condition of the areas in question.

2. Evaluation

At the same time that it finalized the wilderness inventory, the FNF released a wilderness evaluation worksheet in order to facilitate public participation in the evaluation process. The planning team developed a set of questions and measures based on the evaluation criteria in Chapter 70 of the draft planning directives. The worksheet included a map of each area, the evaluation criteria and associated questions, and a list of measures to address the criteria, as well as boxes for adding narrative responses. The FNF initially provided a 3-week comment period on the evaluation worksheets but added an extra week upon request.

The planning team is currently working on the wilderness evaluations and intends to release the draft results as an appendix to the detailed Proposed Action statement in early 2015. The public
will have an opportunity to comment on the draft evaluations as part of the scoping process on the Proposed Action.

3. Discussion

The FNF has done a reasonably good job of implementing Chapter 70 so far. It has involved the public at each step, carefully considered the public comments, and made appropriate changes in response to comments. The FNF process has been transparent, responsive, creative, and professional. For example, the planning team prepared an inventory process paper and brought in additional expertise (a landscape architect) to develop a workable approach to identify old clearcuts that were “substantially unnoticeable.” They have also made effective use of web-based tools, including an interactive online “Talking Points Collaborative Mapping” tool, to engage the public in both the inventory and evaluation steps of the process. In addition, for Google Earth users, the Forest Service made available a KML file of the inventoried areas. Furthermore, the inventory and evaluation process has proceeded quickly without sacrificing accuracy and public involvement, taking only about five months to complete the inventory and then moving immediately into the evaluation.

The primary issues with the Flathead’s preliminary inventory were the definition of “substantially unnoticeable” and the omission of the Sullivan Creek area. The planning team has generally addressed these issues and made changes to the inventory through its response to public comments.

The Wilderness Society’s comments on the Flathead’s wilderness evaluation worksheet raised several issues and concerns:

- There is a potential for conflating apparent naturalness with natural range of variability, which could result in downgrading an area’s wilderness suitability based on past fire suppression and other activities that are clearly allowed by the Wilderness Act.
- The evaluation could inaccurately estimate an area’s winter non-motorized recreation opportunities, since the FNF is largely open to Over Snow Vehicle (OSV) use and the agency has not yet completed motorized winter planning.
- There is potential for misuse of external sights and sounds to downgrade an area’s wilderness character. The Forest Service has historically been criticized for taking an overly “purist” approach toward evaluating wilderness suitability. Consideration of external sights and sounds may not be an appropriate way to evaluate an area’s opportunities for solitude.
- The evaluation may not adequately represent all of the wilderness-associated wildlife present in the area. The FNF worksheet mentioned just two species – wolverine and mountain goat – but not the grizzly bear, lynx, marten, elk, bull trout, and westslope cutthroat trout.
- The evaluation may overlook the nationally and globally significant wilderness values in the FNF, as well as opportunities to improve the ecological diversity of the National Wilderness Preservation System (NWPS). The Wilderness Society conducted an analysis of ecosystem representation to investigate how land cover types are distributed within the NWPS both nationally and on the FNF. The analysis found both significant under-representation of certain ecosystem types within the NWPS and significant potential to
increase ecosystem representation. For example, only 8% of the FNF’s mesic mixed
conifer forests were located in designated wilderness, but two-thirds of those forests are
within the wilderness inventory areas.

Since the Flathead has not yet released the results of its evaluation, it is too early to tell how well
the agency will respond to these issues.

B. Cibola National Forest, New Mexico (Region 3)

Located in northern New Mexico, the 1.9 million-acre Cibola National Forest (CNF) contains
138,000 acres of designated wilderness and 246,000 acres of IRAs. The CNF began work on the
plan revision Assessment in the fall of 2012 and released a draft Assessment in April 2014.
Work on the wilderness inventory began in the fall of 2013 and will continue into early 2015.

The CNF developed a website specifically for the wilderness inventory and evaluation process.
The website describes the major steps and criteria for inventory, evaluation, and analysis, and
introduces an interactive online mapping tool that the agency has used to collect public input
during the inventory phase.

1. Inventory

The CNF is using a two-stage process for conducting its wilderness inventory. Using inventory
criteria listed on the CNF’s website, the agency identified approximately 501,202 potentially
suitable acres in the first stage of the preliminary inventory, which is double the acreage of IRAs
in the forest. The website includes “preliminary inventory” maps of lands that may be suitable
for wilderness for each ranger district (Magdalena, Mt. Taylor, Sandia, and Mountainair). The
preliminary inventory did not remove areas based on consideration of improvements, like
grazing structures or mines. In the second phase of the inventory, the CNF is using a process
with public engagement to determine the meaning of “substantially noticeable” that will be used
to exclude such improvements.

The CNF offered nearly three months for the public to provide input on its first preliminary
inventory (until November 21, 2014). The agency is revising this preliminary inventory based on
public input received. It will then release a second preliminary inventory for additional public
input sometime in early 2015. After taking a second round of public input and revising the
inventory accordingly, the agency intends to release a final inventory and move to the evaluation
phase.

The agency held public workshops in several communities in and around the CNF to explain the
inventory and the overall Chapter 70 process. The agency is utilizing a web-based interactive

36 http://www.fs.usda.gov/detailfull/cibola/landmanagement/planning/?cid=stelprp3816113&width=full
mapping tool\textsuperscript{41} to collect public input on the inventory. The Forest Service’s intention with using the mapping tool is to facilitate the public offering site-specific information relating to the Chapter 70 inventory criteria. The agency also offered more traditional comment forms for people who prefer not to use the online mapping tool.

2. Evaluation

The website’s evaluation section lists the general criteria that the agency will use to gauge the wilderness characteristics of each area included in the final inventory. The Forest Service has not yet made available the precise methodology for using these criteria to evaluate wilderness character. The Forest Service’s website says that it will again seek public participation through collaborative workshops and web-based tools during the evaluation phase.

3. Discussion

Overall, the Cibola’s inventory process has been rigorous, comprehensive, and transparent. Given that the CNF was operating without final directives, the inventory process has represented a good-faith effort to comply with the draft directives while being responsive to the FACA Committee’s recommendations. The preliminary inventory is broad and inclusive; it includes all IRAs under the Roadless Rule and adds many new roadless areas that were not previously inventoried.

For the most part, the agency properly applied the size criteria, with one notable exception. As discussed previously, the directives instruct the agency to include areas in the inventory that are “contiguous to an existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventories of other Federal ownership,” regardless of their size. The CNF narrowed this criterion by including only those areas that are “adjacent to an existing wilderness.” Consequently, the inventory overlooked an area that is less than 5,000 acres but is adjacent to a BLM Wilderness Study Area, which qualifies as administratively recommended wilderness.

Consistent with the Chapter 70 directives, the agency did not disqualify areas that include ML 1 (closed) roads. The agency also included in the preliminary inventory areas with improvements that are substantially unnoticeable. The agency excluded areas with utility corridors and cleared rights of way that are substantially noticeable.

Additionally, a handful of projects on the forest are undergoing NEPA analysis, including a travel management plan for the Magdalena Ranger District, which could affect the outcome of the inventory. The Forest Service is aware of these projects and intends to update the draft wilderness inventory map as project decisions are signed. The agency appears to be striving for an accurate final inventory that reflects on-the-ground conditions and recent decisions.

The Forest Service has given the public ample opportunity and options for providing input.

\textsuperscript{41} https://my.usgs.gov/ppgis/studio/launch/16978
The agency collected public input for three months on the first preliminary inventory and will offer a second round of public input on the inventory before it becomes final.

Like the other early-adopter foresters, the CNF is using an interactive online “Talking Points Collaborative Mapping” tool to enable the public to offer site-specific information. The agency is hoping this tool will guide the public towards providing accurate information that it can use to help delineate inventory boundaries. While the tool has had some technical difficulties, it is an innovative approach utilizing current technology for collecting information from the public. The agency has also developed a form to complete and submit by those who prefer not to use the online tool to convey their ideas.

The agency has done a commendable job interacting with the public, providing timely information, and responding to concerns. The agency held workshops in local communities to explain the Chapter 70 process and offer instruction about how to provide input. The agency made its slideshow presentation available online for those who could not attend the workshops. The CNF has presented at meetings hosted by other groups, responded to emails and phone calls in a timely fashion, and developed an updated FAQ42 that provides accurate information about the plan revision and wilderness.

Unfortunately, misinformation about the wilderness evaluation process has been rampant in one community near the CNF. The misinformation has led to distrust, anger, irresponsible behavior, and disrespectful remarks directed towards agency staff. It appears as though just a few people are responsible for spreading this misinformation. As noted above, the CNF has gone to great lengths to ensure that all stakeholders understand the process. Many of the agency’s outreach efforts are partially in response to the spread of misinformation in order to stamp out rumors.

The CNF’s website has been informative, up-to-date, and easy to navigate. Forest and regional staff have been responsive to questions and requests throughout the process. For example, in response to public feedback, the agency offered a second round of public input on the inventory, made adjustments to the online mapping tool to improve functionality, and joined meetings hosted by members of the public to help explain the process and offer instruction on how to use the online mapping tool. Planning staff also provided spatial data of the preliminary wilderness inventory to enable The Wilderness Society to conduct ecological analyses.

Unlike some other early adopters, the CNF website has not provided a detailed process paper that fully describes the CNF’s wilderness inventory and evaluation process. While the CNF provides a useful overview of the Chapter 70 process online43, there are important details missing. For instance, the online materials do not indicate how the agency will address improvements that are substantially noticeable. As noted above, the CNF is using a public engagement process to determine the meaning of “substantially noticeable,” but the agency has not explained this in the materials that are available online. The CNF should provide a more thorough explanation of the process online, including its methodology for each step.

43 http://www.fs.usda.gov/detailfull/cibola/landmanagement/planning/?cid=stelprd3816114&width=full
There is also potential concern about how the agency handled ML 2 roads in the inventory analysis. The roads layer shown in the preliminary inventory map appears to include many ML 2 roads that are not depicted on the CNF’s Motor Vehicle Use Maps (MVUM). The CNF notes that this situation could occur for a couple of reasons: the ML 2 roads at issue could be closed to public motorized use but designated for administrative use or some other purposes, or a NEPA decision may have designated roads for public use, but the roads are pending a certain action such as a wildlife or cultural survey before being shown on the MVUM. Nonetheless, the discrepancy between the MVUM and the roads used in the inventory analysis raises concerns about the inventory’s accuracy.

Finally, the CNF has indicated that the information received from the public in response to the inventory maps will be evaluated through interviews with district staff who have knowledge of the areas, Google Earth, agency databases, GIS data, and other reliable information sources including ground-truthing to address questions related to substantially noticeable improvements. Thus, the agency appears to be making a reasonable effort to validate the information provided by the public. This indicates that the agency appreciates the importance of utilizing accurate data in the process and ensuring that information provided by the public receives serious consideration.

C. Sierra, Sequoia, and Inyo National Forests, California (Region 5)

The Sierra, Sequoia, and Inyo National Forests in California’s Sierra Nevada are jointly revising their forest plans with the assistance of planners in the Forest Service’s Pacific Southwest Regional Office (Region 5). The Forest Service intends to analyze all three plan revisions in a single EIS.

The Region has a website describing the wilderness inventory and evaluation process that is currently organized into three sections: background, inventory, and evaluation. The website’s background section describes the process and provides a link to the process document, which describes the major steps and criteria for inventory, evaluation, analysis, and decision.

1. Inventory

The Region 5 planners used a three-stage process to produce their wilderness inventory. First, they created a “draft preliminary inventory map” including all map polygons that met the road improvements criteria of the draft directives and did not have powerlines, pipelines, or other cleared right-of-way structures. This step produced an initial inventory of nearly 2 million acres. Second, the planners eliminated polygons that did not meet the size criteria or contained substantially noticeable improvements, resulting in an “updated preliminary inventory map” that excluded 528,000 acres from the initial inventory. Third, during June 2014 the Region took public comment on the preliminary inventory maps before releasing the final inventory maps. Inventory boundaries for the Sequoia National Forest – the only one of the three forests that has

44 http://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=STELPRD3803608
completed the Travel Analysis Process – were adjusted based on the TAP’s identification of unneeded roads, resulting in the addition of over 17,000 acres to that forest’s final inventory.

The final inventory included a total of 1.4 million acres of wilderness suitable lands – 303,000 acres in the Sierra, 534,000 acres in the Sequoia, and 600,000 acres in the Inyo. This is about 30% more land than the amount previously identified as IRAs in these three forests (171,000 acres in the Sierra, 346,000 acres in the Sequoia, and approximately 590,000 acres in the Inyo).46

The Region 5 website displays the preliminary and final inventory maps (Sierra47, Sequoia48, North Inyo49, South Inyo50, and an overview51 of the three forests) of potentially suitable wilderness areas. It also contains a zipped ESRI ArcGIS 10.1 geodatabase containing the official final wilderness inventory dataset.

2. Evaluation

The Pacific Southwest Region is currently engaged in the process of evaluating lands in the final wilderness inventory. After evaluating each inventoried area for its wilderness characteristics, the agency will write a narrative description of the areas using a wilderness evaluation template. The planners will then write a summary of wilderness character for each area evaluated (with accompanying large-scale maps) and include this information in the draft EIS accompanying the three proposed plan revisions.

The website’s “evaluation” section describes the process of evaluating the wilderness characteristics of each area included in the final inventory. As a first step in the evaluation process, the Region identified motorized trails on the final inventory maps. Areas with authorized motorized trails were determined – irrespective of other potential wilderness attributes – to lack wilderness character “due to the prevalence of motorized activity and its impact to the surrounding area” and because “there is a high level of commitment to maintaining these authorized motorized trails.” An interdisciplinary team for each forest identified areas within the inventory where wilderness character is impacted by motorized trails and “highlighted” these portions of the inventory (about 19% of the total area of the final inventory). According to the website, “each area will be evaluated as a whole, but the focus for the detailed evaluation will be on the portions of the inventory that do not contain motorized trails (remaining 81%).” The map of the areas to be evaluated in detail was posted on a Talking Points52 Collaborative Mapping website.

The public input period for the wilderness evaluation ended in September 2014. This comment period, however, is more accurately described as an opportunity for the public to comment on the

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46 Approximately 240,000 acres of IRAs in the Inyo were designated wilderness in the Omnibus Public Land Management Act of 2009.
52 http://my.usgs.gov/ppgis/studio/launch/16850
areas themselves in the final inventory and not to comment on the method that the forests are using to evaluate inventoried areas.

The Forest Service will be using three documents to help it evaluate the wilderness character of each area: 1) evaluation criteria in the Chapter 70 directives; 2) the Rocky Mountain Research Station’s General Technical Report 151, Monitoring Selected Conditions Related to Wilderness Character: A National Framework53; and 3) a “Wilderness Evaluation Narrative Outline.” The latter document is a series of questions that expand on the five qualities in the Wilderness Act and the directives: naturalness; outstanding opportunities for solitude or primitive and unconfined recreation; size and manageability; ecological, geological, or other features of scientific, educational, scenic, or historical value; and degree to which it can be managed to preserve wilderness character. The questions contained in the Narrative Outline are being assembled and quantified in a spreadsheet, but neither the document nor the precise evaluation methodology is yet available to the public.

3. Discussion

The inventory process for the three California early adopter plans was rigorous, comprehensive, transparent, and repeatable; it was a good-faith effort to comply with the Chapter 70 draft directives. The inventory includes all IRAs under the Roadless Rule and adds many new roadless areas that were not previously inventoried. The Region used the Forest Service’s INFRA database to determine road maintenance levels. Areas with ML 2 roads that were identified as “open for public use” in the Motor Vehicle Use Maps were eliminated from the wilderness inventory, unless those roads were subsequently identified as “unneeded” in the Travel Analysis Process. However, only one forest (Sequoia) of the three has completed the Travel Analysis Report necessary to identify unneeded roads.

The Sierra Nevada forests’ process has several other positive features:

- The process paper that identifies the methods for inventory and evaluation was provided to the public early in the process, and all intermediate steps in the inventory process were shown on GIS maps.
- The Regional Wilderness Program Leader has been responsive to questions and requests and has provided spatial data of the final wilderness inventory to enable independent ecological analyses.
- The Region has shown interest in working with the conservation community to incorporate ecological analyses into the process. For example, the Regional Wilderness Program Leader has made an exceptional effort to use the best available science on ecosystem representation in the wilderness system (The Wilderness Society study) and incorporate it into the wilderness evaluation process. The Region’s wilderness team prepared a data summary for each roadless area, ranked by percent composition of under-represented ecosystems, to use in the wilderness evaluation.
- The Region’s website is informative, up-to-date, and fairly easy to navigate.

• The public has been given the opportunity to comment at every stage of the process so far (though it is unclear whether there will be a comment opportunity on the individual area evaluations prior to inclusion in the draft EIS).

A major concern with the evaluation process is the insertion of a preliminary step into the process that has effectively eliminated many inventoried areas from serious consideration. As previously noted, the Region identified areas with authorized motorized trails, made a preliminary determination that those areas lacked wilderness character, and decided to focus its evaluation on the remaining 81% of the inventory. This step appears inconsistent with the Chapter 70 directives. Motorized use should be considered simultaneously with all other factors influencing wilderness character – not given special priority. As a result of this extra step in the process, 19% of the final inventory area was essentially dropped from detailed consideration.

Another concern with Region 5’s process is that public comment periods have been too brief. Typically, the public has been given 30 days (and sometimes less) to submit comments at each stage of the process. However, the data needed to conduct analyses has not always been available at the start of the comment period, so the effective time frame is even shorter. For example, the spatial data for the final inventory was not available until two weeks into the 30-day comment period for the evaluation. In addition, the Talking Points interactive comment site crashed several times and was not ideal for posting in-depth comments (there were word limits, no mechanism to show analyses, and all comments were supposed to be solely place-based).

A few other concerns have emerged from the Sierra Nevada process:
• It is at present unclear how the evaluation questions for wilderness character listed in the Narrative Outline will be quantified or qualified. The outline suggests some potential problems, including improper evaluation of apparent naturalness (focusing on ecological integrity and historical conditions, rather than whether the area generally appears natural to the average visitor).
• The Forest Service apparently is not planning to provide for public review and input on the results of the evaluation prior to development of the wilderness suitability appendix to the draft EIS. That means that the agency may already have determined what areas to carry forward for analysis by the time the public can provide input and identify any infirmities in the evaluation.
• The Inyo and Sierra National Forests have not completed Travel Analysis Reports. Without those reports, roads that are potentially unneeded will continue to eliminate areas from wilderness consideration.
• Some officials from Sierra Nevada national forests have made public and private statements revealing their personal and ideological opposition to new wilderness designations, potentially prejudicing the process and eroding trust among stakeholders.

D. Nantahala-Pisgah National Forest, North Carolina (Region 8)

Located in the Appalachian Mountains of western North Carolina, the 1.1 million-acre Nantahala-Pisgah National Forest (N-P) contains 70,000 acres of designated wilderness and 152,000 acres of IRAs. The N-P began its plan revision during 2013, soon after the first early
adopter forests. The N-P’s [website](http://www.fs.usda.gov/detail/nfsnc/home/?cid=stelprd3822407) has a separate section devoted to the wilderness inventory and evaluation process.

1. Inventory

In April 2014, the Forest Service released an initial wilderness inventory along with a detailed explanation of its seven-step inventory methodology. This inventory included 209,600 acres in 20 separate areas and 14 additions to existing designated wilderness areas. While this was a 38\% increase over the total acreage of existing IRAs, several IRAs were not included in the wilderness inventory, including a congressionally designated Wilderness Study Area. In addition, the inventory left out several “Mountain Treasure” areas that The Wilderness Society and other conservation groups are supporting for recommended wilderness and other designation.

The initial inventory, as well as the methodology used for the inventory, was open to an informal 30-day comment period. Conservation groups submitted detailed comments on the inventory, identifying problems in the methodology along with site-specific reasons why certain areas should be included in the inventory. They also met with the N-P planning staff and Forest Supervisor in August 2014 to discuss inventory issues.

In November 2014, the Forest Service released a revised inventory that totaled 215,007 acres, a 41\% increase above the total acreage of existing IRAs. According to maps and the GIS layer released to the public, this inventory added one new stand-alone area, added two extensions to existing wilderness, included 200 acres of an IRA located mostly within the adjoining Cherokee National Forest, and adjusted boundaries for a number of other areas, resulting in a net increase of 5,146 acres compared to the initial inventory. PDF maps and an interactive mapping tool were posted. The Forest Service did not revise the inventory methodology, but said that regional officials would send a written response to conservationists’ issues.

The regional office’s response cited the addition of five new areas and the expansion of seven areas in the revised inventory with a net increase of 24,000 acres inventoried. Subsequent discussion with N-P staff has made clear that the Forest had intended to add two additional areas to the inventory -- Overflow (an IRA and Wilderness Study Area) and Bearwallow (an IRA). However, these areas were not included on maps made available during the public comment period. N-P planners have acknowledged the omission of Overflow and Bearwallow and have posted corrected maps and inventory materials incorporating these areas in the inventory. With the posting of the corrected inventory on January 29, 2015, the comment period on wilderness evaluation was also reopened.

2. Evaluation

At the same time that the revised final wilderness inventory was released, the Forest Service also launched an informal 45-day public comment period for the wilderness evaluation, ending on January 5, 2015. As noted above, a corrected inventory was posted on January 29, and the
The comment period was extended until February 27, 2015. The N-P’s Wilderness Inventory and Evaluation Process webpage listed the five evaluation factors that are set forth in the Chapter 70 directives, along with a series of questions to consider. Regarding the naturalness factor, the N-P webpage asks about invasive species, fish stocking, fish and wildlife habitat and connectivity, and the presence of cell towers and other improvements. For the solitude and primitive recreation factor, the N-P asks about exterior sights and sounds and adjacent development or activities, as well as evidence of civilization within the area.

One option for providing public comment on the evaluation is to use a web-based collaborative Mapping Tool, made accessible via a link at the bottom of the webpage. Users of the mapping tool are able to submit anonymously either general comments or comments on specific areas. Following are two examples of area-specific comments that were posted on the mapping tool during the first two days of the public comment period:

Comment 25660: “Bald Mtn (formerly known as the Shelton Laurel Backcountry Area) … is a remote area adjoining Cherokee NF and very close to Sampson Mtn Wilderness on the Cherokee. This would provide a wonderful wildlife corridor travelling up the spine of the Appalachians which is expected to be important as climate change sends some species northward. The area has waterfalls, rock outcrops, lovely cove forest, and is topped by the [Appalachian Trail].”

Comment 25684: “Woodlawn/Woods Mtn contains many old logging roads, trails that are 12’ wide with gravel bases, culverts etc. that are currently being used by mtn bikes & stock. They do not fit the ‘untrammeled by man’ category.”

3. Discussion

The Forest Service has taken several positive steps to encourage public involvement in the Chapter 70 wilderness inventory and evaluation process so far. The planning team has created a separate wilderness evaluation webpage and has promptly posted materials to it. The web-based mapping tool has provided a good opportunity for web-savvy members of the public to look at the inventory and provide comments. The Forest Service has also promptly provided GIS layers for the inventory. Numerous public meetings have facilitated discussion with the planners about the inventory and other planning issues. The Forest Service also considered conservationists’ Mountain Treasure inventory as input into the process and ran all of the areas through its inventory methodology. In addition, planners agreed to a meeting to discuss inventory issues, and when it was clear that conservationists’ interpretation of the Chapter 70 directives differed from theirs, they agreed to verify their interpretation with the Region 8 office.

The Forest Service’s inventory methodology for the N-P has been controversial. The planning staff has maintained that its methodology is a “reasonable interpretation” of current national guidance. However, the N-P inventory methodology appears to differ markedly from the inventory criteria in the Chapter 70 directives. Specifically:

55 https://my.usgs.gov/ppgis/studio/launch/24175
The methodology appears to eliminate areas that the directives would clearly include as part of a “reasonably broad and inclusive” inventory, especially in the eastern national forests. IRAs included in the Roadless Rule were initially not included in the wilderness inventory. The inventory also initially omitted one area that is both a Congressionally-designated Wilderness Study Area (WSA) and an IRA. Although planners now state that these areas will be added to the inventory, other areas that seem to qualify under Chapter 70 directive criteria have not been included.

All closed ML 2 roads appear to be used as disqualifying features in the inventory in apparent contradiction to the Chapter 70 directive to inventory areas in the eastern national forests with ML 2 forest roads that are closed to motor vehicles year-long. Forest Service staff claim that all ML 2 roads in the N-P are considered “open” because they can be administratively opened at any time, despite the fact that these roads are gated and are not seasonally open, they do not appear on the Forest MVUM (prepared and issued under 36 C.F.R. § 212.56 showing roads open to use), and the N-P Assessment documents that ML 2 roads are not open. Furthermore, since many of these ML 2 roads are unmaintained and impassable, they should not be considered disqualifying features under the directives.

The N-P is counting ML 2 roads as disqualifying features even in areas that have been proposed for consideration as recommended wilderness through public involvement during the Assessment or previous forest planning processes. Although the Forest Service accepted the Mountain Treasure areas as public input into the Assessment and inventory process, roads in these areas were used as disqualifying features.

Three areas less than 5,000 acres have been included in the revised inventory. However, these areas include only IRAs: Overflow, Bearwallow, and Slide Hollow. Other than IRAs, the N-P has not included in the inventory other areas less than 5,000 acres that satisfy the size criteria in the Chapter 70 directives.

Roads impinging into wilderness inventory areas are arbitrarily buffered by 500 feet on each side creating an exclusion of 1,000 feet along roads, often unmaintained ML 2 roads. Based on a review of designated wilderness in the Southern Region, this 500-foot buffer appears unprecedented.

The inventory process excluded – as a bright-line test – any discrete area in which vegetation management has occurred within the past 20 years, thus whittling down the wilderness inventory. This approach seems inconsistent with the language of the Chapter 70 directives and also departs from the longstanding interpretation of the statutory definition of wilderness. The directives explain that planning staff should consider the eligibility of “the area as a whole”; the broader area to be inventoried may include areas with vegetation treatments and timber harvest. It is the broader area’s eligibility that is at stake when vegetation management has occurred within that area.

Another inventory problem is that the N-P’s travel analysis has been inadequate and has not been integrated into the planning process. A Travel Analysis Report completed in 2012 for the Pisgah transportation system found that the expected budget was only 13% of that needed to adequately maintain the current road system. Yet only 2.25 miles of road were identified in the “optimum road system” for potential decommissioning, and 180 miles of road were identified for upgrading versus 113.5 miles for downgrading. Besides failing to grapple with identifying a sustainable

56 § 71.22b.
road system during this planning process, the wilderness inventory also used roads identified for upgrade as fragmenting features in the inventory. Nantahala has not completed a Travel Analysis Process, but the road system on the Nantahala is similar to Pisgah and likely has similar deferred road maintenance shortfalls.

Regarding the evaluation process, the Forest Service appears to be making a good-faith effort to involve the public by posting information about the evaluation criteria and providing a 45-day comment period. At this point it is unclear how the Forest will evaluate wilderness suitability. Besides a brief list of wilderness characteristics, there has been no discussion about how the evaluation will be conducted and how public comments will be integrated with the Forest Service’s analysis. Many of the questions posed to the public appear to invite objections to areas having wilderness characteristics. For example, the evaluation of solitude and primitive recreation opportunities poses questions about external sights and sounds, but omits any questions about quiet recreational uses and opportunities such as nature observation.

The relationship between the wilderness evaluation process and the simultaneous development of management area proposals was also problematic. As a part of a proposed management framework, the Forest proposed the allocation of lands to specific management, including timber production. This proposal included over 57,000 acres as timber-suitable lands within the same areas that were being evaluated for potential wilderness recommendation, which may prejudice the wilderness evaluation of those inventoried areas.

Insufficient time has been allotted for wilderness evaluation and other critical parts of the planning process. After the revised wilderness inventory was released on November 20, 2014, the public had until January 5, 2015, to submit wilderness evaluation comments. During this same period the public was expected to submit comments on the management area framework, including desired conditions, standards and guidelines, and comment on the proposed management area mapping. Because areas in the wilderness inventory are mapped into suitable management, the public will also have to propose alternative management designations for special areas that are not suitable for wilderness but should receive some level of protection. The errors and discrepancies in the inventory seem a likely result of too hurried a process, with insufficient time to conduct analysis or adequately listen to and accommodate substantive public input. On the other hand, the N-P planners seem willing to step back and reopen public comment on the evaluation, which will be important for public engagement and building confidence in the process.

More broadly, the N-P early adopter experience has demonstrated that the way in which the Forest Service formulates and sequences proposals, and frames issues, can have major ramifications on opportunities for collaboration. For example, the rollout of management proposals at the same time that the public was being asked to address wilderness evaluation inevitably pitted different interests against each other. By contrast, management proposals developed after and informed by the wilderness evaluation could have facilitated collaboration and integrated competing interests.
E. Nez Perce–Clearwater National Forest, Idaho (Region 1)

The 4 million-acre Nez Perce-Clearwater National Forest (NPCNF) contains 1.1 million acres of designated wilderness and 1.5 million acres of IRAs. As the Forest Service stated in its 2014 Proposed Action statement, the NPCNF “serves a unique national role providing vast, contiguous wildland areas including the Selway-Bitterroot, Gospel-Hump, and Frank Church-River of No Return Wilderness areas with regional linkages in the Hell’s Canyon Wilderness area and Idaho Roadless Rule areas such as the Great Burn and Mallard-Larkins. Together these areas comprise the largest complex of unroaded lands in the lower 48 states.”

1. Inventory, Evaluation, and Proposed Action Options

Unlike all of the other early adopter forests examined in this report, the NPCNF chose not to use the 2012 planning rule’s Chapter 70 directives. Instead, according to the 2014 Assessment posted on the Nez Perce Clearwater National Forest Plan Revision website, the 2007 version of the Chapter 70 directives is the “guiding document being used to begin the process of assessing the capability, availability and need for recommending inventoried roadless areas (IRR areas) for wilderness designation.” Furthermore, the Assessment indicates that the Forest Service will be relying on the roadless area maps generated during the rulemaking and NEPA process for the 2008 Idaho Roadless Rule.

In July 2014, the Forest Service released a Proposed Action for the NPCNF plan revision that included two options for recommended wilderness designation. One option is based on the recommended wilderness proposal developed through public input for the 2004–2007 plan revision effort. The other option in the Proposed Action is based on public input provided since reinitiating the plan revision effort in 2012. The latter option includes considerably more recommended wilderness and other administrative designations than the former. The Proposed Action did not mention how the NPCNF used the Chapter 70 guidelines to inventory and evaluate recommended wilderness.

The Forest Service provided a four-month public comment period on the Proposed Action that concluded in November 2014. Prior to the public comment period on the Proposed Action, the Forest Service held several public meetings on the Forest Plan Revision, some of which discussed the topic of recommended wilderness. The next major step in the planning process will be the release of a draft EIS, currently expected in the summer of 2015. The Forest Service intends to include wilderness inventory and evaluation information in an appendix to the EIS, which will be the first time the public will have had an opportunity to see and comment on this information.

2. Discussion

The Wilderness Society and other conservation groups have been involved and working with the Forest Service throughout the forest planning process. While the Forest Service appears to be

responding to collaborative input regarding recommended wilderness in its Proposed Action, the lack of a comprehensive wilderness evaluation is cause for concern. The Idaho Roadless Rule was never intended to inventory or evaluate lands for their wilderness suitability. Another concern is the NPCNF’s stated intention to use the 2007 planning directives to conduct their wilderness evaluation when most of the forest plan revision is being done under the latest directives. The 2007 directives prescribe the traditional three-part evaluation of capability, availability, and need. This evaluation system has often been criticized as biased against wilderness.

With the vast acreage of roadless lands in the NPCNF, the amount of suitable wilderness is significant. By relying on the Idaho Roadless Rule as a proxy for recommended wilderness, along with using the old Chapter 70 regulations, the Forest Service is short-circuiting its duty to fairly evaluate the amount of suitable lands that meet the inventory and evaluation criteria spelled out in the new Chapter 70 planning directives. The Forest has gone to great lengths to involve the public in the forest plan revision, including providing opportunities to provide suggestions on recommended wilderness. However, the Forest Service could do more to communicate with the public about their evaluation process and how inventoried areas will be considered for inclusion as recommended wilderness. Furthermore, the forest plan Assessment that is supposed to inform the proposed action is incomplete and lacking important information that should help inform decisions around recommended wilderness. By not allowing the public to analyze how the agency evaluated different candidate areas for recommended wilderness until the draft EIS is released, per the Chapter 70 guidelines, there is insufficient transparency with the public about how the agency developed its recommendations. The new Chapter 70 guidelines were designed to provide a rational and transparent process for making decisions on recommended wilderness.

The agency is using old planning guidelines and relying on inventory and analysis information that was assembled prior to development of the draft Chapter 70 directives. The new directives were developed specifically to address deficiencies in the old process for inventory and evaluation. If the NPCNF uses the old planning process criteria, it will be leaving out a critical component of the new forest plan revision process. Consequently, important roadless areas may not receive a thorough and proper analysis and consideration as recommended wilderness.

V. Conclusion

A. General Observations

Overall, the Forest Service appears to be making a good effort to implement the wilderness inventory and evaluation process in Chapter 70 of the new planning directives. With the exception of the Nez Perce-Clearwater National Forest (which is relying on previous planning), all of the early adopter forests examined in this report have been providing opportunities for public participation at each stage of the inventory and evaluation process. Except for the Nez Perce-Clearwater, all have created webpages that focus solely on the Chapter 70 process, and they are creatively using web-based technology to make maps of potential areas available and provide opportunities for public input and feedback. The Forest Service has also held public
meetings on the wilderness inventory and evaluation, and has made the GIS data available for independent analyses. All of the case study forests (including the Nez Perce-Clearwater) have been responsive to wilderness-related public input, which bodes well for future public participation in the planning process there and elsewhere in the country.

For the most part, the early adopters so far have accurately followed the national guidelines to conduct the wilderness inventories and evaluations. However, there have been some notable exceptions:

- The Cibola National Forest inventory omitted one area adjacent to a BLM Wilderness Study Area.
- The three California national forests inserted a preliminary step in the evaluation process that effectively removes from serious consideration any inventoried area that contains designated trails for off-highway vehicles, regardless of the area’s wilderness values.
- The Nantahala-Pisgah National Forest inventory eliminated numerous areas that contain closed ML 2 roads, eliminated some areas based on overly strict application of size criteria, and drew a huge, 500-foot buffer around all roads.

Some issues have arisen for which national guidelines are currently lacking, such as:

- At what point do past management activities become “substantially unnoticeable?”
- Should the lack of funding for road maintenance be factored into determining whether an undrivable but officially “open” road disqualifies an area from the wilderness inventory?
- Should areas in the eastern national forests be held to the same wilderness suitability standards as areas in the West?

Other questions that may emerge in the near future as the early adopter forests move forward in the chapter 70 process include:

- How should external sights and sounds be considered in evaluating an area’s opportunities for solitude, if at all?58
- Should the evaluation of naturalness be done from the perspective of a casual visitor (appearance) or a knowledgeable land manager using best available science (e.g. using indicators of ecological integrity)?59

B. Recommendations

Below are The Wilderness Society’s initial recommendations to improve the implementation of Chapter 70, based on best practices and areas of concern observed so far in early adopter wilderness evaluation processes. These recommendations are intended to support the public engagement, planning efficiency, and ecological sustainability goals of the 2012 Planning Rule and 2015 directives. We anticipate that later versions of this report will yield additional recommendations given that forests will be further along in the process.

58 The 2015 directives address this issue by specifying that the evaluation of opportunities for solitude “may” consider, among other factors, “pervasive sights and sounds from outside the area.” § 72.1(2)(a) (emphasis added).
59 The 2015 directives may help to resolve this potential issue by requiring planners to evaluate each area’s “apparent naturalness.” § 72.1(1) (emphasis added).
**General**
- All future plan revisions, including those in Idaho and Colorado, should use the new planning directives, including Chapter 70.
- Allow sufficient time for critical stages of the process.

**Public Engagement**
- Give the public an opportunity to comment on the methodologies and preliminary results of the wilderness inventory and evaluation.
- Offer a reasonable duration of time for public comment opportunities, and make sure that information is available at the start of the comment period.
- To the extent practicable, ensure the public understands the Chapter 70 process in order to address concerns.
- For each forest undergoing a plan revision, develop a website that is dedicated to the Chapter 70 process, serving as a one-stop shop for all relevant information.
- Clearly communicate the inventory and evaluation methodology. This includes:
  - Which roads will be disqualifying features, which will not, and why?
  - What is the agency’s methodology for gauging whether an improvement is substantially noticeable?
- Continue to use the interactive online mapping tool in the Chapter 70 process, and address technical difficulties to improve its functionality where needed.
- Check the accuracy of comments received from the public before utilizing the information in the inventory and evaluation process. For example, verify that comments documenting on-the-ground conditions about an improvement are accurate before using this information to disqualify an area from the inventory or down-rating its score in the evaluation.

**Inventory and Evaluation Criteria Application**
- Correctly interpret the size criteria in the planning directives – namely, that lands that are contiguous to existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventories of other Federal ownership, regardless of their size, should be included in the inventory. Do not limit consideration to only those lands that are contiguous to existing wilderness.
- Use the findings from travel analysis to determine whether a road should be a disqualifying feature. Specifically, those roads identified as “likely unneeded” in the travel analysis process should not disqualify areas from the inventory.
- Carefully apply the relevant criteria in Chapter 70 to each ML 2 road to determine whether to include or exclude an area from the inventory. It is not appropriate to circumvent the process by categorically disqualifying areas from the inventory that include ML 2 roads.
- Do not attempt to short-cut the evaluation process by eliminating areas from consideration based on presence of off-road vehicle trails.
- Conduct analyses to identify under-represented ecosystem types within the National Wilderness Preservation System and the potential to increase ecosystem representation.