

Final Identification and Inventory of Lands on the Flathead National Forest That May be Suitable for Inclusion in the National Wilderness Preservation System

August 8, 2014

Overview of the Identification and Inventory Process

When developing or revising a forest plan, the Forest Service must identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands to be designated as wilderness.¹ This is done in four steps: inventory, evaluation, analysis, and recommendation. **This document describes how the Flathead National Forest planning team completed the first step of the process to identify and inventory potentially suitable lands.**

Upon completing this first step, the Flathead National Forest Planning Team will begin the second step: evaluation. The wilderness evaluation takes a more detailed look at the inventoried areas to evaluate the wilderness characteristics as defined in the Wilderness Act of 1964 for each area.

Once the wilderness evaluation is completed, the responsible official will determine which areas to carry forward as recommended wilderness for analysis in the environmental impact statement (EIS) for the forest plan revision. This analysis is the third step.

In the final step, the responsible official will review the analysis disclosed in the EIS along with all tribal, governmental, and public input and decide which areas, if any, to recommend for inclusion in the National Wilderness Preservation System.

Public Participation

The Flathead National Forest is actively engaging the public, tribes, other local governments and government agencies throughout this process to acquire feedback and input on the inventory, evaluation, and analysis of areas for wilderness recommendation.

On May 12, 2014 an interactive map was made available on the Flathead National Forest website displaying an initial identification and inventory of lands that may be suitable for inclusion in the National Wilderness Preservation System. A draft of this paper, explaining our methodology was also available for comment. These products were provided to the public with a 45-day comment period to solicit input.

Key Concerns from the Comment Period

We received 16 comments, which our interdisciplinary team considered in the inventory process. From these comments we identified some key concerns.

¹ Planning regulations (CFR §219.7(c)(2)(v)) and the Forest Service Handbook (FSH) 1909.12, chapter 70 provide direction and guidance for this process.

One key concern was that the effects of fire on lands that were harvested within the last 40 years was an important factor that needed to be considered. We agreed and decided this would be addressed in the final identification and inventory methodology.

Another key concern was that we excluded areas that had maintenance level 2 roads (see Glossary for definition). The Forest Service Handbook directs us to exclude these roads if they have been improved and are maintained by mechanical means to ensure relatively regular and continued use. Mechanical treatment could include brushing the road, logging out, or replacing culverts. The interdisciplinary planning team reviewed this criteria again and determined that excluding level 2 roads from the inventory was appropriate as it was expected that these roads are likely to receive some type of mechanical treatment during the life of the forest plan.

Other key concerns were related to inventoried roadless areas (IRAs). One concern was that all inventoried roadless areas should be in the wilderness inventory. There is no requirement in the Forest Service Handbook that all inventoried roadless areas need to be included. Another concern was that we didn't include the Mission Mountains IRA 01504. Based on this comment, we reexamined the wilderness inventory and found that a majority of the Mission Mountain IRA 01504 met the criteria for wilderness inventory (an area with regeneration harvest was excluded). This wilderness inventory area is now called North Fork Coal Creek.

Another key concern was that areas less than 5,000 acres were not included in the inventory. To address this we asked for line officer and district review of areas less than 5,000 acres outside of the wilderness inventory. This review again concluded that that no areas less than 5,000 acres were practicable to preserve and use in an unimpaired condition.

Please see Appendix B for response to concerns from wilderness inventory comments

Developing the Inventory

The primary function of the identification and inventory step is to efficiently and effectively identify all lands within the plan area that may have wilderness characteristics as defined in the Wilderness Act of 1964 (16 *United States Code* 1131–1136, 78 Stat 890), using a transparent process. Lands included in the inventory are documented and identified on a map and carried forward for further evaluation.

To develop the inventory of lands on the Flathead National Forest that may be suitable for recommendation as wilderness, we used three categories of inventory criteria (size, forest road improvements, and other improvements) and information obtained during our *Assessment of the Flathead National Forest* (USDA Forest Service 2014), as directed by the Forest Service Handbook. **It is important to note that lands included in the inventory provide a starting point for further evaluation, and their inclusion is not a designation that conveys or requires a particular kind of management.**

Criteria for Including Lands in the Inventory

Size

When considering the size of potential areas for inclusion in the inventory, we used the following guidelines:

- National Forest System lands outside of existing designated areas that were at least 5,000 contiguous acres or greater.
- Areas contiguous to existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventories of other Federal ownership, regardless of their size.
- For areas less than 5,000 acres, each district ranger met with their staff to consider and determine whether such areas could be preserved in an unimpaired condition.

Improvements

Lands to be considered for inventory may or may not have improvements. Improvements consist of things that show evidence of human activities such as roads, structures, or past management activities. The presence of such improvements does not necessarily exclude areas for consideration in the inventory.

Forest Road² Improvements

We included the following areas with road improvements in the inventory. Guidance on forest road improvements considered can be found in FSH 1909.12, chapter 70, section 71.22a.

1. Areas that contain objective maintenance level 1 (see *Glossary* for definition) forest roads.
2. Areas with routes that are decommissioned, unauthorized or temporary, or forest roads that are identified for decommissioning in a previous decision document or in travel management plan or travel analysis.
3. Areas with forest roads that are identified to be reclassified to maintenance level 1 in a previous decision document or in a travel management plan or travel analysis.
4. Areas with forest roads that were proposed for consideration as recommended wilderness in the 1986 Forest Plan, in the draft 2006 Forest Plan, and through public involvement during the development of the *Assessment of the Flathead National Forest* (USDA Forest Service 2014).
5. Areas with historic wagon routes, historic mining routes, or other settlement era transportation features considered part of the historical and cultural landscape of the area.

We *excluded* areas from the inventory that contained the following road improvements:

1. Permanently authorized roads validated by a Federal court or the Department of Interior for which a valid easement or interest has been properly recorded.

² A forest road is defined as a road wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the System and the use and development of its resources (36 CFR 212.1).

2. Forest roads maintained to levels 3, 4 or 5.
3. Areas of forest roads maintained to level 2; we determined that all forest roads maintained to level 2 roads receive some type of mechanical treatment to ensure relatively regular and continued use.

Other Improvements

Other improvements on the Flathead National Forest were reviewed to determine whether to include or exclude areas in the inventory (table 1, next page). Guidance on improvements considered can be found in FSH 1909.12, chapter 70, section 71.22b.

Table 1. Determination of whether areas with certain types of improvements were included or excluded in the inventory

Improvement Type	Remarks
Airstrips	Airstrips were excluded from the inventory because the 3 airstrips were next to open roads.
Heliports	These are temporary structures and included in the inventory if there were any.
Vegetation treatments that are not substantially noticeable.	These were included in the inventory. The definition for substantially noticeable, and how the team used the concept in the inventory, is presented in appendix A.
Timber harvest areas where logging and prior road construction are not substantially noticeable.	Timber harvest areas where logging and prior road construction are not substantially noticeable were included in the inventory. Areas where regeneration harvest had taken place within the last 40 years and where significant fire occurred were reviewed in detail to determine if they should be included in the inventory. The definition for substantially noticeable, and how the team used the concept in the inventory, is presented in appendix A.
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	It was determined that these vertical structures had minimal impact, including their maintenance and access requirements; therefore areas with vertical structures were included in the inventory.
Areas of historic mining where impacts are not substantially noticeable.	Areas of historic mining activity are very limited on the Flathead National Forest; therefore these areas were included in the inventory.
Areas of mining activity where impacts are not substantially noticeable.	Areas of mining activity are very limited on the Flathead National Forest; therefore these areas were included in the inventory.
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	Areas that have range improvements are very limited on the Flathead National Forest; therefore these areas were included in the inventory.
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps. As a general rule, do not include developed sites. Areas with minor, easily removable recreation developments may be included.	Areas with dispersed camping sites and outfitter camps were included in the inventory as they are temporary and easily removed. Areas with developed recreation sites were excluded from the inventory. Trails are not considered to be a recreational improvement.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	Whether we include them or exclude them is dependent on what type it is. Most power lines are in main road corridors which were not included in the wilderness inventory areas. Small buried water transmission lines were included in the wilderness inventory.
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions. Areas may include minor watershed treatments that have been accomplished manually such as small hand-constructed gully plugs.	Areas of watershed treatment are very limited on the Flathead National Forest; therefore these areas were included in the inventory.
Lands adjacent to development or activities that impact opportunities for solitude. The fact that the non-wilderness activities or uses can be seen or heard from within any portion of the area, shall not, of itself, preclude inclusion in the inventory.	Areas adjacent to development or activities were included in the inventory.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	Areas with structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area were included in the inventory.

Areas Included in the Inventory

The areas listed in table 2 are areas we have identified and included in the inventory and will carry forward for further evaluation. The wilderness evaluation, the second step, will take a more detailed look at these inventoried areas to determine how well they meet wilderness characteristics using a set of criteria based on the Wilderness Act of 1964.

Table 2. Wilderness Identification and Inventory August 2014

Area	Acres
Beaver Lake	3,542
Bob North**	88,041
Canyon	18,814
Coal	67,184
Cold Creek	674
Crane Porcupine ³	5,338
Demers	6,959
Elk Creek	7,739
Essex	23,061
Fatty Creek	4,963
Glacier Creek	2,590
Hungry Horse Reservoir East*	37,152
Hungry Horse Reservoir West*	178,536
Jim Creek	1,509
Le Beau	6,340
Lindbergh Lake	1,019
Meadow Lake	1,033
NF Cold Creek	445
Piper Creek	590
Puzzle	24,110
Sky West	6,266
Swan Face South*	52,958
Tuchuck	34,189
Whale	69,597
Woodward Creek	2,198
TOTAL	644,847

* Previously part of the BMSSHH (Bear-Marshall-Scapegoat-Swan-Hungry Horse) polygon⁴.

** The Bob North area was revised on August 19, 2014 to exclude the Silvertip Cabin, a reduction of 52 acres.

³ When reviewing the wilderness inventory process, we identified this new polygon that was over 5,000 acres.

⁴ Because the BMSSHH polygon in the draft wilderness inventory was very large (352,165), the planning team felt that to adequately evaluate the land for wilderness character, it was necessary to separate the BMSSHH polygon into smaller polygons. We divided the BMSSHH area along the geographic area boundary lines, except where we split the Swan Face area from the Hungry Horse Reservoir (to make Hungry Horse Reservoir West polygon), which followed the 1986 Forest Plan recommended wilderness line for a short distance.

References

USDA Forest Service, 1986, Flathead National Forest Plan, United States Department of Agriculture, Forest Service.

USDA Forest Service, 2006, Proposed Flathead National Forest Plan, United States Department of Agriculture, Forest Service.

USDA Forest Service, 2014, Assessment of the Flathead National Forest, United States Department of Agriculture, Forest Service.

Glossary

Road Maintenance levels. The level of service provided by, and maintenance required for, a specific road.

Level 1. These are roads that have been placed in storage between intermittent uses. The period of storage must exceed 1 year. Basic custodial maintenance is performed to prevent damage to adjacent resources and to perpetuate the road for future resource management needs. Emphasis is normally given to maintaining drainage facilities and runoff patterns. Planned road deterioration may occur at this level. Appropriate traffic management strategies are to "prohibit" and "eliminate" all traffic. These roads are not shown on motor vehicle use maps. Roads receiving level 1 maintenance may be of any type, class, or construction standard, and may be managed at any other maintenance level during the time they are open for traffic. However, while being maintained at level 1, they are closed to vehicular traffic but may be available and suitable for non-motorized uses.

Level 2. Assigned to roads open for use by high clearance vehicles. Passenger car traffic, user comfort, and user convenience are not considerations. Warning signs and traffic control devices are not provided with the exception that some signing, such as W-18-1 "No Traffic Signs," may be posted at intersections. Motorists should have no expectations of being alerted to potential hazards while driving these roads. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. Log haul may occur at this level. Appropriate traffic management strategies are either to "discourage" or "prohibit" passenger cars. "Accept" or "discourage" strategies may be employed for high clearance vehicles.

Level 3. Assigned to roads open and maintained for travel by a prudent driver in a standard passenger car. User comfort and convenience are not considered priorities. The manual on uniform traffic control devices is applicable. Warning signs and traffic control devices are provided to alert motorists of situations that may violate expectations. Roads in this maintenance level are typically low speed with single lanes and turnouts. Appropriate traffic management strategies are either to "encourage" or "accept" passenger cars. "Discourage" or "prohibit" strategies may be employed for certain classes of vehicles or users.

Level 4. Assigned to roads that provide a moderate degree of user comfort and convenience at moderate travel speeds. Most roads are double lane and aggregate surfaced. However, some roads may be single lane. Some roads may be paved and/or dust abated. The manual on uniform traffic control devices is applicable. The most appropriate traffic management strategy is to

"encourage" passenger cars. However, the "prohibit" strategy may apply to specific classes of vehicles or users at certain times.

Level 5. Assigned to roads that provide a high degree of user comfort and convenience. These roads are normally double lane, paved facilities. Some may be aggregate surfaced and dust abated. The manual on uniform traffic control devices is applicable. The appropriate traffic management strategy is to "encourage" passenger cars.

Appendix A

Defining “Substantially Noticeable”

Because the term substantially noticeable is not directly defined in the Forest Service handbook for wilderness evaluation (FSH 1909.12 chapter 70, 71.22b), the plan revision team vegetation and scenery specialists developed a definition with the forest landscape architect’s input. Our definition of substantially noticeable is: what a viewer will likely see when viewing harvest areas and associated roads from the background, mid-ground and foreground of an area to assist in determining whether or not vegetation treatments, timber harvest, and prior road construction were substantially noticeable and, consequently, whether or not they were included or excluded from the wilderness evaluation inventory.

For the purpose of this wilderness evaluation process, vegetation treatments and timber harvest are considered different activities.

Vegetation Treatments

These include only prescribed fire use and non-commercial fuel reduction treatments that do not produce wood products. These types of treatments generally have not created substantially noticeable effects on the Flathead National Forest landscape. For these reasons, we included vegetation treatment areas in the wilderness evaluation inventory.

Timber Harvest Activities

Based on the following factors, it was determined that regeneration timber harvest (such as clearcuts and seed tree harvests) and associated road building activities that were conducted within the last 40 years (since 1974) were substantially noticeable on the Flathead National Forest. We based this determination on factors such as tree height growth, stand productivity, stand densities, time of tree regeneration, topographic features (such as slope), abundance and type of ground vegetation (such as shrub density), and distance from harvested area. There is obvious variability in stand conditions across the Flathead National Forest, but for the purposes of this inventory process and the need to consider all National Forest System lands outside of existing wilderness (1,024,526 acres), the timeframe of 40 years was used as a point in time that, in general, areas harvested within the last 40 years, were determined to be substantially noticeable. However, areas that had regeneration harvests as well as fire had a detailed review by the interdisciplinary team to determine if the fire ameliorated the effects of harvesting. The interdisciplinary team made the determination on a case by case basis if those areas were still considered to be substantially noticeable. If they were determined to not be substantially noticeable, they were included in the wilderness inventory. If they were determined to be still substantially noticeable, they were excluded from the inventory.

Tree growth rates (height growth), especially in young, immature tree stands, depend upon site productivity. We estimated average stand height growth across all sites on lands suitable for timber production. On the better growing sites of the Flathead National Forest, one could expect the average stand height to increase by about 11 inches per year during the first 40 years of

growth. On the poorest sites, average stand height may increase on average about 6 inches per year. Therefore, on the Flathead National Forest, a 40-year-old stand would generally have a height range of 20 to 37 feet, depending on site productivity.

What a Viewer is Likely to See

Boundaries of past regeneration harvest units on the Flathead National Forest are typically geometric in shape with straight lines that contrast with unharvested areas. When viewed from the background (4 or more miles away), harvested areas are typically very distinct, with the line of delineation between harvested areas and unharvested areas substantially noticeable from the background view.

Roads within and surrounding the harvested area are particularly visible during the first few decades after harvest, until young trees have gained sufficient height to block views of the road. In areas with steep terrain, the steep slopes increase the visibility of prominent cut and fill slopes and require longer time periods before trees are tall enough to block continuous view of the road.

After four decades, trees should generally be high enough (20 to 37 feet) to reduce the line of delineation between harvested and unharvested areas as well as intermittently break up views of road cuts and fills.

In the mid-ground view (0.5 to 4 miles from viewer), evidence of past regeneration harvested units are similar to background views except that the viewer may not have a continuous line of sight as when viewing from the background view. The line of delineation between harvested and unharvested areas, as well as road cuts, may be interrupted due to terrain and vegetation.

In the foreground view (0 to 0.5 mile from viewer), decomposition is slower under the drier and colder conditions of the Flathead National Forest, as compared to warm, moist forests in other parts of the Northern Rockies or Pacific Northwest. Therefore, stumps are generally still evident within 4 decades after harvest, particularly in drier area. After 4 decades, stumps have decomposed or ground covers (shrubs) sufficiently block the visibility of the stumps. Road cuts may be long lasting and evident to the foreground viewer for longer than 40 years.

The delineation between harvested and unharvested areas diminishes as young trees grow and reduce views within the harvested area.

Wildfire may soften edges created from the delineation between harvested and unharvested areas and skyline corridors; it may also burn stumps, standing trees, and logging residual such as branches and boles that reduce the visual effect of harvesting. However, it may also expose more roads associated with the harvested area. When reviewing harvested areas where fire occurred, we utilized the web based tool google earth to view the area post-fire along with district staff knowledgeable about the areas.

Conclusion

After considering tree height growth, stand productivity, stand densities, time of tree regeneration, topographic features, and abundance and type of ground vegetation at different viewing differences, areas of past harvest are generally found to be substantially noticeable, on average, for at least 40 years from time of harvest. The high contrast edges created by the harvest, associated road cuts, and evidence of mechanical harvest (such as visible stumps, skyline corridors) within these areas, were the most prominent features affecting the substantially noticeable determination. As mention before, the effects of fire were also taken into account and a determination made on a case by case basis to determine if the area harvested within the last 40 years is no longer substantially noticeable due to fire in the harvest area.

Appendix B

Table 3. Concerns from wilderness inventory comments and response to concern

No.	Concerns	Response
1	There is a concern that the wilderness inventory is incorrect because it included trails which should be considered developed recreation sites. The process paper states that developed recreation sites are not included; therefore, areas with trails should not be included into the wilderness inventory.	Trails are not considered developed recreation sites, they are infrastructure and there is no direction to exclude them from the wilderness inventory.
2	There is a concern that we did not account for how wildfire has a significant effect on diminishing the degree to which logging units are or are not substantially noticeable.	Areas that had regeneration harvests since 1974 as well as fire were reviewed by the interdisciplinary team to determine if the fire effects reduced the appearance of the harvest areas and made them no longer substantially noticeable. The interdisciplinary team made the determination on a case by case basis if those areas were still considered to be substantially noticeable. If they were determined to not be substantially noticeable, they were included in the wilderness inventory. If they were determined to be still substantially noticeable, they were excluded from the inventory. Approximately 8,800 acres were added to the wilderness inventory.
3	There is a concern that areas within the wilderness inventory should receive a special management area prescription (e.g. wildland restoration zones or wildlands recovery areas) that will keep these areas on track and trending toward qualifying for recommendation as wilderness.	The directives on wilderness evaluation indicate that lands included in the inventory provide a starting point for further evaluation, and their inclusion is not a designation that conveys or requires a particular kind of management.
4	There is a concern on how the scenic integrity map layer factored into wilderness inventory methodology.	We reviewed the scenic integrity map to make sure it was consistent with the substantially noticeable areas.
5	There is a concern that areas that have maintenance level 2 roads should be included in the wilderness inventory. Some felt that public input should be considered and other additional information that may warrant inclusion of some areas that contain unmaintained level 2 roads. Some felt that each ML 2 road that contributes to exclusion of an area in the inventory should be documented. Some would like us to consider the inclusion of maintenance level 2 roads that are closed to public use and are located near or are adjacent to wilderness lands.	The directives allow exclusion of these roads if these roads receive some type of mechanical treatment to ensure relatively regular and continued use. The interdisciplinary team reviewed this issue and concluded that maintenance level 2 roads are likely to receive some type of mechanical treatment in the life of the plan. Mechanical treatment could include brushing the road, logging out, or replacing culverts.

No.	Concerns	Response
6	<p>There is a concern that roadless lands were omitted from the wilderness inventory, specifically Mission Mountain Wilderness Addition 01504, where only the northern half contains roads and harvest areas. Some believe that all inventoried roadless areas need to be within the wilderness inventory. Some thought that inventoried roadless areas should be listed/mapped separately on the wilderness inventory to promote transparency and facilitate public comment.</p>	<p>We reviewed the wilderness inventory and found that a portion of the Mission Mountain IRA 01504 met the criteria and should be in the wilderness inventory. It is now included in the inventory and called North Fork Coal Creek (228 acres).</p> <p>The Swan River Island IRA that is 465 acres was not included in the wilderness inventory because it was less than 5,000 acres and determined that its preservation and use in an unimpaired condition was not practicable; all other inventoried roadless areas are included in the inventory if they meet the methodology.</p> <p>The inventoried roadless areas was available to review during the comment period as a layer. In an appendix to the EIS, we are required to display areas identified in the Forest Service Roadless Area Conservation Final EIS.</p>
7	<p>There is a concern that much of the areas in the wilderness inventory do not meet the definition in the Wilderness Act of 1964 as many of these areas have been heavily logged and contain roads. Just because the roads are closed do not mean the land is no longer undeveloped or untrammelled by man.</p>	<p>The wilderness evaluation takes a more detailed look at the inventoried areas to determine whether they meet criteria for wilderness characteristics as defined in the Wilderness Act of 1964.</p>
8	<p>There is a concern that the criteria for wilderness inventory are too liberal with the human impact elements such as roads and past harvest units and that the broad brush approach includes areas that are unlikely to score well in the evaluation process.</p>	<p>We followed the draft wilderness evaluation directives Forest Service Handbook (FSH) 1909.12, chapter 70. The wilderness inventory is supposed to be a broad and inclusive look at areas to go through wilderness evaluation.</p>
9	<p>There is a concern that the LeBeau area which is a research natural area that barely meets the minimum acreage of 5,000 ac meets the intent of wilderness designation and wilderness designation may actually degrade the value of the RNA from a research standpoint.</p>	<p>The LeBeau area is over 6,000 acres, and meets the other criteria outlined in the process paper for inclusion into the wilderness inventory.</p>
10	<p>There is a concern that some of the areas in the wilderness inventory are too close to highway and open roads and edges of active management and those activities degrade the wilderness value and potential.</p>	<p>We followed the draft wilderness evaluation directives Forest Service Handbook (FSH) 1909.12, chapter 70. The wilderness inventory is intended to be broad and inclusive, based on the inventory criteria. The intent is to provide transparency of which lands are evaluated and considered for further analysis, allowing for input and feedback. During the wilderness evaluation step, a detailed look at the inventoried areas to determine whether they meet criteria for wilderness characteristics as defined in the Wilderness Act of 1964.</p>

No.	Concerns	Response
11	There is a concern that the inventory excludes all areas that are smaller than 5,000 acres and are not contiguous with existing wilderness, and that these unroaded areas less than 5,000 acres should be included in the wilderness inventory. Some felt that an area less than 5,000 acres in size when joined to an adjacent roadless area, that its size may not be an obstacle to management that maintain the area in an unimpaired condition.	Each district ranger met with their staff to review areas less than 5,000 acres. The wilderness inventory map was reviewed and a line officers determination was made and documented that no areas less than 5,000 acres were practicable to preserve and use in an unimpaired condition.
12	There is a concern on the definition of substantially noticeable regarding timber harvest. Some felt that putting a definitive date (1974) is wrong because of the varying vegetative response; some harvested areas grow quickly and no longer are substantially noticeable within the 40 year timeframe while others feel that any area that has had timber harvest or human manipulation should be excluded.	We reviewed the substantially noticeable determination; other than reviewing the effects of fire on past timber harvest, we feel this determination is appropriate.
13	There is a concern that we should expand the wilderness inventory process to address ecosystem function by including in the wilderness inventory, any potentially suitable lands that serve to secure functioning habitat for migrating species, and any areas that protect or facilitate recovery of listed species.	We followed the process outlined in Forest Service Handbook (FSH) 1909.12, chapter 70
14	There is some concern that the wilderness inventory should include areas identified in the Northern Rocky Ecosystem Protection Act (NREPA). Some people also would like the wilderness bills of 1988 and 1994 mapped on the wilderness inventory.	Only wilderness bills pending before Congress are required to be mapped.
15	There is concern that the visual quality objectives and standards in the 1986 forest plan were designed to mitigate degradation of scenic values; therefore, timber sales since the 1986 plan should have minimal effects on scenic values.	Visual quality objectives ranged from preservation to maximum modification. In timber harvest areas in modification and maximum modification, a range of timber harvest effects were allowed, many allowing delineation between harvested and unharvested stands, and geometric lines which make some harvested unit substantially noticeable.
16	There is a concern that a substantial portion of the Bunker Creek area (from Gorge Creek Trailhead to the Forks) was not included in the wilderness inventory because there is a permanently installed linear right-of-way structure (bridge) that is being maintaining in management area 11 (Grizzly Bear Management) that is managed to provide optimum grizzly bear habitat, classified as “unsuitable” for timber and closed to motorized recreation. We propose that all lands within the Bunker Creek Grizzly Bear Management Area be evaluated in the inventory.	There are substantially noticeable harvest units in the Bunker Creek area that would have excluded the area from wilderness inventory; however, as this area was identified during the assessment phase to be included in the inventory, therefore, we included it in the wilderness inventory. A portion of the Bunker Creek area was excluded from the wilderness inventory because of the noticeable improvement of a bridge as well as other substantially noticeable regeneration units on either side of the road to the east of the bridge.