

**Forest Service response to the Wyoming Wilderness Association's and Western
Watersheds Project's comments
on the
February 2007 Shoshone National Forest Evaluation of Inventoried Roadless Areas for
Possible Wilderness Recommendation**

This document contains excerpts from Wyoming Wilderness Association (WWA) and Wyoming Western Watershed Project (WWP) March 29, 2007 comments on the Shoshone's preliminary draft revised forest plan and Forest Service responses to the comments. Though this may not cover every comment presented in the letter, it does include the main points we feel should be addressed.

WWA and WWP comments are in plain type; Forest Service responses are in italics.

The decisions that were made by the forest service for inclusion or exclusion of areas as Recommended Wilderness are fundamentally invisible to the public, and do not appear to be directly based on the capability, availability, and needs assessment. The decision to include or exclude areas should be base directly upon the roadless areas analysis.

The assessment was used to provide information and to develop a comparative ranking among the areas. This assessment, along with public input, resource considerations, and current designations will be used to develop a wilderness recommendation. The assessment is not being, nor is it intended to be, used as a screening process to determine whether an area should be recommended for wilderness.

When considering a smaller area that may be connected to a larger area, it is important to keep the bigger picture in mind. These Roadless Areas are not isolated patches of wild country, but are rather parts of a much broader ecosystem.

The process is designed to be able to look at things area by area. This approach meets our needs for distinguishing between areas. As mentioned above, other factors besides the assessment are considered. For example, we take into account the fact that the DuNoir additions are adjacent to the DuNoir. That is the reason they are near the top of the list for consideration, as reflected in the options that have been presented to date, despite the lower assessment scores. It is easier to consider these broader views in our current approach than it would be to distinguish individual area attributes if we had used an approach that aggregated areas together.

Likewise, smaller places such as North Boundary should be considered in connection with surrounding areas. Maybe the 181 acres alone are not much for endangered species, but as a part of the larger adjacent Absaroka-Beartooth Wilderness in the Custer National Forest they gain significance.

We do agree that adjacent areas should be considered as we mentioned in the previous response. However, we disagree that such adjacency automatically adds to the significance. If the North Boundary does not have some unique characteristic, we don't see how it adds anything significant to whole Absaroka-Beartooth Wilderness.

Sometimes, as in the "other special features" category, it seems as if the value should not be an average of specific elements of that category, but rather a high rating in just one element would create a high rating for the category. If there are "other special features" that warrant a high rating but a lack of "designated special areas," and vice versa, a high rating seems most appropriate.

A number of the suggested changes would result in different ratings, but most wouldn't change the relative rankings between the areas. Some suggestions did point out double counting or weightings of the rankings that didn't seem right. We reviewed the categories

and rankings and did make adjustment to fix problems we thought had been identified. We believe an averaging of the rankings provides for a better way to differentiate between the different areas. A system where more areas ranked all high would make it more difficult to differentiate between the areas. It is important to remember that the assessment is used as a way to compare and differentiate between areas. The assessment is one piece of information for the decision maker to consider when developing a wilderness recommendation—other factors are public input, resource considerations, and current designations. One verification of the process is when we compared the highest ranked of our areas that they predominantly matched the areas that ranked highest in the amount of public comment and recommendation.

Also, a clerical error: In the cumulative analysis, Wood River RA (#02052) is given a moderate rating in the “Need” category, but in the “Need” analysis this area is given a “high” rating. Upon reviewing the Need analysis, it is clear that the rating in the cumulative analysis should be corrected to read “high” as opposed to “moderate.”

We repaired these errors and others that were identified, and screened and repaired similar errors.

Questions for the forest service: How was oil and gas potential under a given roadless area determined?

It was determined from the oil and gas potential map produced as part of the 1992 Final Oil and Gas Leasing EIS (Figure III-2).

Questions for the forest service: How was it determined that areas needed active restoration activity due to specific species survival, or identifiable fuels reduction activity to reduce the risk of wildfire, or known areas of severe insect infestations that will lead to high tree mortality?

We based this on proximity to infrastructure (including roads, buildings, campgrounds, etc.) and the fuels conditions. We did not identify any areas based on specific species survival criteria.

Questions for the forest service: How was the presence of non-native species determined?

We based this on the current invasive plant inventory.

Questions for the forest service: How was the water quality determined?

Based on hydrologist ranking and information developed as part of the watershed assessment.

Questions for the forest service: The Forest Service should provide additional maps that include these layers overlaying the new roadless area inventory.

This information will be made available.

It would be worthwhile for the SNF to explain its choice of criteria to fulfill its Capability Analysis. When considering the *natural* characteristics, the SNF focused on:

1. The diversity of native mammals, birds, and fish
2. The variety of threatened and endangered species
3. The importance of streams to historic distribution of Yellowstone cutthroat trout
4. Linkage between wildlife areas or habitats

This is in some degree of contrast to the Forest Service Handbook (1909.12, ch. 70), which directs planning personnel to consider the following factors:

- a. The presence of non-native species
- b. Developments that degrade free-flowing rivers and streams
- c. The presence of light pollution
- d. The presence of pollutants
- e. The health of rare or at-risk ecosystems, plant communities, and plant species

Understandably, some criteria such as the presence of pollutants and light pollution seem more applicable to a fragmented National Forest than they do to a wild and intact ecosystem like the Shoshone. The lack of these disturbances, however, should not diminish the wilderness characteristics of a Roadless Area. On the contrary, the air-, ground- and light-pollutant free characteristics of most roadless areas in the Shoshone should increase their values in a Capability Analysis across the board. Furthermore, it does not seem that at-risk plant communities or ecosystems were sufficiently considered in this analysis. A great deal more analysis should be done by the forest service of these communities to accomplish a satisfactory Capability Analysis. In short, the Wyoming Wilderness Association would like to see light pollution, pollutants, and at-risk ecosystems & plant communities more sufficiently considered.

The handbook identifies criteria that can be considered in the assessment, but they are not requirements. We didn't use factors b, c, and d because these are not issues in Shoshone roadless and do not provide any valuable information for differentiating between the areas.

We did make some changes to address the other categories.

The factor on noxious weeds was moved up to this section. We believe it addresses the non-native criteria. In addition, we think the Yellowstone cutthroat trout factor addresses the presence of non-native trout.

On the issue of health of the ecosystem, we believe all areas support native species. The factors on T&E species and habitat and habitat linkage are related in that it shows that ecosystems support some of the most critical species.

The water quality factor was moved to this section, since water is a key component of ecosystem health.

When considering *undeveloped* characteristics, the SNF used the following criteria:

- a. Signs of human disturbance
- b. Presence of human activities in area's foreground
- c. Presence of improvements
- d. Presence of noxious weeds
- e. Water quality

Such criteria, in fact, go above and beyond the direction in the FSH, which instructs forest planning personnel to consider only the level of human occupation or modification, "including evidence of structures, construction, habitations, and other forms of human presence, use, and occupation."

There is no direction in the FSH for considering the condition of lands surrounding a Roadless Area, such as an area's foreground. Furthermore, while the presence of noxious weeds and the water quality of a given Roadless Area may well be the result of human influence, these criteria do not seem to be in the spirit of the directive, which focuses on visual human structures and construction. The Wyoming Wilderness Association would like to see the Forest Service focus more precisely on human developments in this criterion.

We agree the factors on noxious weeds and water don't belong here. They were moved to the previous category. We believe the factor related to adjacent development is appropriate, since such development does intrude on the wilderness character of the area, whether it would be a mining operation or a highway. Though such items don't disqualify the area from designation, it does seem prudent to consider them.

To determine a Roadless Area's Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation the direction in the FSH instructs planning personnel to determine an area's capability of providing solitude or primitive and unconfined types of recreation, including opportunities for "physical and mental challenge, adventure and self-reliance, feelings of solitude, isolation, self awareness, and inspiration." When analyzing solitude, the FSH directs personnel to consider the "size of the area, presence of screening, distance from impacts, and degree of permanent intrusions." When measuring primitive and unconfined recreation, the FSH directs personnel to consider "the opportunity to experience isolation from evidence of humans, to feel a part of nature, to have a vastness of scale, and a degree of challenge and risk while using outdoor skills," especially in relation to such activities as "hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature."

While this is by far the most involved point the Forest Service analyzed and the level of analysis is admirable, it would appear that the degree of analysis in fact undermined the inherent value of the land. For example, undue weight is given to certain categories, such as "trails." Trails are considered three times for hiking, backpacking, and saddle stock. "Terrain" is considered five times, for providing challenge and adventure, for hiking opportunities, for hunting opportunities, for skiing and snowshoeing opportunities, and for snowmobiling opportunities. In some cases, considering the same basic feature over and over through nuanced recreational uses tends to over-inflate the value of that feature. In other cases, considering the same feature can provide contradictory results, as a high terrain rating for the "provides challenge and adventure" category, which would have "generally rugged" terrain, would contradict a high rating for the "hiking opportunities" category, which would have gentle terrain and "vegetation open to allow easy cross country travel."

Another contradictory element can be found under the "Opportunity for solitude" category, where the recreation value receives a high rating if "use is light." Though not obviously contradictory, the presence of "two or more mainline trails" for hiking and backpacking opportunities, or of "at least one mainline trail designed for saddle stock" would more than likely detract from opportunities for solitude. Mutually exclusive values should not be considered in such a way that they would cancel each other out.

We made a few changes. Hiking and backpacking are aggregated. We removed redundancy for solitude factors. We understand your comments that uses may be over represented. In discussions with our team, we felt we wanted to have the identified range of uses for consideration in the process. Though terrain is mentioned in multiple places, in most cases it is uniquely related to a use and the impact that terrain has on the opportunity for that use. As the process works forward, the key factor is the use and not

the terrain aspect of that use. It is true we could have chosen to do this section differently. For now the team feels this is the most appropriate way to assess this element. We don't believe this is skewing the analysis in any detrimental way and provides a focus on uses and recreation.

To determine a Roadless Area's *Special Features and Values*, the FSH directs planning personnel to evaluate "ecologic, geologic, scientific, educational, scenic, historical, or cultural significance," including "unique fish and wildlife species, unique plants or plant communities, connectivity, potential or existing research natural areas, outstanding landscape features, and significant cultural resource sites." The FSH also directs personnel to "describe any such values and their contribution to wilderness character."

This is an excellent opportunity to point out the inherent flaw in this analysis, namely, the necessity for an area to score well in many areas to achieve a "high" rating. If an area has no high peaks but does have another special feature such as a high alpine meadow, it may still receive a moderate rating--such a process artificially under-represents the significance of a special feature of a place. A Capability Analysis should not be cumulative. The overarching values of an area cannot be adequately determined by tallying up scores across a wide range of characteristics. Rather, if significant characteristics are apparent anywhere across a value, it should rank high in capability.

Furthermore, the FSH directs personnel to describe values that affect its rating. Since no such values are described anywhere in the Capability Analysis, it is impossible to evaluate the criteria used in the Shoshone planning personnel's determination. It is not apparent from the process that unique fish and wildlife species, unique plants or plant communities, connectivity and significant cultural resource sites were considered, as directed in the FSH. The SNF should adhere more closely to current directives.

For each roadless area, there is a description in the back of the assessment that describes its characteristics and unique features. Those descriptions are the basis for these factors.

We do not agree that the analysis is flawed. By using an average, our process identifies areas that have multiple special features. This approach helps differentiate between areas. If it took only one special feature to be classified as high, almost all the areas would rate as high and the factor would provide little value in trying to compare and rank areas. This analysis is based on a comparative analysis of the roadless areas. We are not comparing the roadless areas to other areas that are not roadless. We are comparing them to each other and a process that differentiates among the areas has more utility than one that would result in similar ratings for all the areas.

We feel wildlife values are represented elsewhere in the analysis. The use of special areas, such as RNAs, provides a good surrogate for ecologic values since the RNAs were chosen based on the types of unique plant communities they encompass.

To determine an area's *Manageability*, in the FSH, planning personnel are directed to consider factors such as "size, shape, and juxtaposition to external influences." To do so, the following criteria are used:

- a. "Boundaries locations avoid conflict with important existing or potential uses outside the boundary that might result in demands to allow nonconforming structures and activities in the wilderness."
- b. Boundaries can be described and recognized on the ground.
- c. Boundaries conform with terrain or features that create a barrier to prohibited use.

d. Boundaries provide adequate access and traveler transfer facilities.

The SNF, while conducting a thorough and detailed analysis of manageability, seems to have somewhat overstepped the true intention of the FSH direction. Relation of an area boundary to private property or private inholdings, for example, has already been considered by measuring the probability that activities in surrounding areas could affect manageability. Other measures, such as the ability of natural processes to take place, and the visibility of human presence, have no real bearing on manageability.

We dropped the natural processes factor. We agree it does not apply here. We dropped active disturbance on boundary factor since it is redundant with other related factors. We kept the private property and inholding instead, since the degree to which property is intermingled is important. It should be noted that this is not an issue for most roadless areas on the Shoshone.

The Availability process used by the Shoshone adheres more closely to Forest Service directives than the Capability process, and should be commended. The shortcomings lie not in the criteria used for considering conflicting resources, but in the qualitative and quantitative information that should supplement the rating system. The Wyoming Wilderness Association would like to consider the process that was used, compare it to the Forest Service Handbook, and offer suggested steps that could help the Shoshone more closely mirror federal guidelines.

Also it is important to note that, by the Forest Service's own guidelines, "All National Forest System lands determined to meet wilderness capability requirements are considered potentially available for wilderness designation." (FSH 1909.12 ch. 72.2) The purpose of the Availability Analysis should be to determine the value and need for other resources.

In the Availability overview, the Shoshone points out that "other resources, current uses, trends, and potential future uses and outputs need to be considered," which is correct and follows the handbook guidelines. More specifically, however, the Forest is directed to include "pertinent quantitative and qualitative information" as part of this analysis. Additionally, the degree of Forest Service control over the surface and subsurface of the area should also be determined. The Availability process should document situations when resource conflicts are significant, and should be specific about the conflict.

The team believes the availability portion of the assessment provides good information and is adequate for the decision being made at this time. At this time, all that is being considered is whether to make a recommendation. If a recommendation is made in the final plan approval, then a subsequent environmental impact statement will be conducted prior to a recommendation being made to Congress. This environmental impact statement would provide much of the detailed qualitative and quantitative analyses the WWA is looking for. The main factors that lead to high rankings for availability are oil and gas potential, water storage potential, and areas that have been heavily impacted by insect epidemics and have a high mortality. The oil and gas potential is based on the analysis from the 1995 Record of Decision. The water storage potential is based on State of Wyoming information. The assessment does not attempt to make any determination as to whether the areas are suitable for oil and gas, water storage, or whether high mortality areas should be salvaged. The information is provided as potential only and is for consideration. In many areas, other plan direction would preclude an area's suitability. A high rating is not being used to drop areas from consideration.

When compared with the Capability and Availability analyses conducted by the Shoshone National Forest, the Needs analysis is by far the most simple and straightforward.

On one level, the chosen criteria seem appropriate. Many of the factors addressed in the Forest Service manual are over-arching questions that are forest-wide factors rather than area-specific concerns. Factors concerning “present visitor pressure on other wilderness” and “Increase capacity of existing wilderness to support human uses” needn’t be addressed on a case-by-case basis. These overarching factors should, however, be addressed somewhere in the need analysis.

Additional analysis is being added to the assessment.

The area-specific factors that planning personnel are directed to consider are, 1) Need to provide refuge for species that require primitive surroundings, and 2) Ability to provide for preservation of identifiable landform types and ecosystems. In essence, wildlife species, ecosystems, and location are all addressed by the Shoshone, and this seems satisfactory.

A key feature that perhaps has only not yet been addressed is public inclusion. According to the FSH, the Shoshone needs to demonstrate need “through the public involvement process, including public input into the evaluation report.” In other words, a significant factor when considering needs is the public process, and the public’s desire (or lack thereof) for additional Wilderness on the National Forest. Public input on the Need for specific wilderness areas to be included in the National Wilderness System should be solicited and documented. Only then can the Shoshone consider its Needs analysis to be completed.

Additional information is being included in the document.

Other comment

Comment that the analysis does not account for everywhere the Yellowstone cutthroat trout occurs.

The factor is evaluated based on the genetic purity of the Yellowstone cutthroat trout population within that drainage. Some areas with cutthroat trout do not qualify on this basis.

Are grizzly bear or lynx in the area? We know that 16%, or 9,296 acres, of this roadless area is within the Grizzly Bear PCA. This area is entirely outside of existing lynx analysis units. The needs criteria suggest that to acquire a “high” rating requires 100 acres of grizzly bear PCA and of the lynx analysis unit. One would think that 9,000 acres is more valuable than 100 acres, even for just a single species.

The purpose of the factor is to identify whether the area includes both bear and lynx areas or just one of those species, or neither. The 100-acre number is just a bottom line to screen out small acreages that are the result of mapping errors. The rating is not evaluating acres and there is no intent to evaluate the value of the acres. This is similar to earlier discussions. The team developed the process to help differentiate between areas, not identify as many high areas as possible. In comparison to the non-roadless portions of the Forest, most of these areas would come out high.