

## **Response to Feedback on the Coconino NF Draft Potential Wilderness Evaluation Inventory and Capability Results**

The Coconino National Forest released the draft Potential Wilderness Evaluation Inventory and Capability Results for public feedback on January 9<sup>th</sup>, 2009. We received feedback from the Grand Canyon Wildlands Council, The Arizona Wilderness Coalition, and the Arizona Department of Game and Fish. Specific concerns received from these organizations are listed below accompanied by responses from the Coconino National Forest and the Southwest Regional Office (Region 3).

### **Feedback from the Grand Canyon Wildlands Council and The Arizona Wilderness Coalition**

We are concerned with other aspects of the forest's inventory and capability assessment. As to specific areas, we are extremely disappointed that two significant areas strongly advocated and fully justified by conservationists as qualified for wilderness consideration were dropped from further consideration. These areas include:

- The 11,939-acre Deadwood Draw (#18) addition to the 6,155-acre Wet Beaver Wilderness. The decommissioning of a route already recommended for closure by the FS would solidify a continuous protected landscape from Wet Beaver through the Walker Mountain Inventoried Roadless Area. The Forest Service must take into account its other contemporaneous actions and decisions. If the agency has already recommended a road for closure that would then qualify a larger area for possible Wilderness recommendation, that road recommendation should be treated as having been made for the purposes of the wilderness inventory so that the area can continue in the wilderness evaluation process. We believe this applies to the Deadwood Draw area. The decision to drop this area should be reversed.
- Dane Canyon, a scenic, ecologically significant canyon and riparian component of our proposed Barbershop Wilderness, and other suitable areas were dropped from further analysis. Although Barbershop remains an area deemed suitable for further analysis, the FS recognized only 1,310 acres out of the approximately 12,000-acre citizen's proposal.

We believe the detailed wilderness proposals submitted by the Grand Canyon Wildlands and Center for Biological Diversity on May 7, 2007 offer compelling rationale for continued evaluation of these areas.

### **Response from the Coconino NF**

*We appreciate your feedback on the reconsideration of these two areas. We have considered your rationale and have determined that neither Deadwood Draw (#18), nor Dane Canyon will be taken forward for further evaluation for the reasons below.*

*Deadwood Draw (PW-03-04-018) received an overall capability rating of medium. The interdisciplinary group reviewed the rankings for capability and concurred with the original ranking of medium. The GCWC commented that the decommissioning of route 09201J would solidify a continuous protected landscape from Wet Beaver Wilderness Area through the Walker Mt. Inventoried Roadless Area. The implementation of the 2005 Travel Management Rule will determine the initial motorized trail system on the Forest. This process is ongoing and there has not been a decision document signed to close or decommission any roads. Therefore, the Forest may only evaluate existing conditions that exist on the ground now and not speculate on future decisions that have not been determined.*

*The Grand Canyon Wildlands Council submitted a proposal to the Coconino NF to consider an area called Dane Canyon as part of the Potential Wilderness Evaluation. The 12,000 acre proposal included the Inventoried Roadless Area of Barbershop Canyon. The interdisciplinary team used criteria from the Forest Service Handbook 1901.12 Chapter 70 for the initial inventory and the entire evaluation. This criterion includes areas meeting minimum size requirements and the absence of forest roads (36 CFR 212.1) or other permanently authorized roads. The proposal submitted to the Coconino NF for Dane Canyon included several forest roads which excluded the area from our initial inventory. Because of the forest roads in the area, the interdisciplinary team will not reconsider this area for further analysis.*

### **Feedback by the Grand Canyon Wildlands Council and The Arizona Wilderness Coalition**

We also have a number of process concerns. The revised Forest Service Handbook (Forest Service 2007) states that qualifying areas “do not contain forest roads (36 CFR 212.1) or other permanently authorized roads, except as permitted in areas east of the 100th meridian (sec. 71.12). This is a departure from the earlier Chapter 70 language which stated that “areas do not contain improved roads maintained for travel by standard passenger-type vehicles” (emphasis added). We believe the Forest Service erred in adding this language as it violates the intent of the Wilderness Act and serves to decrease, not increase, the amount of land suitable for Wilderness recommendation and eventual designation.

Secondly, we have consistently maintained that the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

**Response from Region 3, Southwest Regional Office**

*With respect to your concerns about the change in language for the exclusion of roads for qualifying areas, the Forest Service is required to conduct wilderness evaluations according to the FSH 1909.12 Chapter 70. The Coconino National Forest and all other units within Region 3 of the USFS are required to conduct wilderness evaluations consistent with this direction.*

**Feedback by the Grand Canyon Wildlands Council and The Arizona Wilderness Coalition**

Third, we are concerned with the manner in which light pollution in the night sky seems to have been used in the capability assessment process. Section 72.1 (c) states “The presence of light pollution that degrades night sky quality and night sky quality related values” as a capability criteria appears contrary to the “sights and sounds” issue directly addressed and dismissed in previous wilderness legislation (e.g., Endangered Wilderness Act.)

**Response from Region 3, Southwest Regional Office**

*Neither the Wilderness Act, nor the Endangered American Wilderness Act addresses light pollution or sights and sounds, specifically. The fact that Congress designated some wilderness with night sky pollution does not preclude considering night sky pollution as one of many factors in future eligibility determinations. In addition, the Federal Register Notice released when FSH 1909.12 Chapter 70 was finalized in 2007 specifically states, “The capability analysis includes an evaluation of an area's ability to provide outstanding opportunities for solitude or primitive and unconfined recreation, consistent with the definition of wilderness in the Wilderness Act. Evaluating the opportunity for solitude appropriately includes isolation from sights, sounds, the presence of others, development, and evidence of humans when analyzing a potential wilderness area.” The agency’s stance is that external sights and sounds, including light pollution, are appropriate factors to consider during the evaluation. Again, wilderness evaluations in Region 3 will be conducted according to Chapter 70, in which light pollution is listed as specific criteria for consideration under Section 72.1 – Capability.*

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Other sections contain elements that appear inconsistent with requirements of the Wilderness Act, e.g., the “Availability” (Sec. 72.2), “Need” (Sec 72.3), and “Factors” (Sec. 72.31; e.g. “location, size, and type of other wilderness in the general vicinity”).

**Response from Region 3, Southwest Regional Office**

*The Coconino National Forest, as well as all other units within Region 3 of the USFS, are required to conduct wilderness evaluations according to the direction in Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 70- Wilderness Evaluations.*

**Feedback by the Grand Canyon Wildlands Council and The Arizona Wilderness Coalition**

Finally, we are not clear what management direction the Coconino National Forest intends to use for the remaining nine roadless areas (including two IRAs) not recommended for further evaluation. Until the legal challenges over the Roadless Rule and the 2008 Forest Service Planning Rule are settled, we urge the Forest to use the 2001 Roadless Area Conservation Rule as management guidance.

**Response from Region 3, Southwest Regional Office**

*The Coconino National Forest, as well as all other units within Region 3 of the USFS, will continue to conduct wilderness evaluations according to the direction in Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 70- Wilderness Evaluations. In addition, all units within Region 3 USFS will abide by any and all interim orders issued by the courts, as well as any national agency direction interpreting those orders, until the courts resolve the suits regarding the 2001 Roadless Rule and the 2008 Planning Rule.*

**Feedback by the Arizona Game and Fish Department (Department)**

The Arizona Game and Fish Department (Department) appreciates the opportunity to comment on the Draft Potential Wilderness Evaluation and Capability Results for the Coconino National Forest. Wilderness areas, or those areas that may become wilderness, are some of the most intact, quality wildlife habitat within the state. The Department looks forward to continuing to provide input as the Forest Service moves through its steps of potential wilderness inventory, evaluation, administrative recommendations, and preparation of Forest Plan Components... The Department is currently in the process of carefully analyzing all 37 potential wilderness areas that met inventory criteria. We plan to prioritize those 11 that may be carried forward to the next phase of possible designation. Within the next month a detailed description of current and planned habitat improvements, timing and execution of wildlife surveys, and hunter access issues will be addressed and presented to the Forest Service for those 11 areas.

**Response from the Coconino NF**

*Thank you for your feedback. Information of your current and planned needs for access into these areas would be helpful in determining the availability and need for these areas as potential wilderness.*