

Citizens for Balanced Use

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Regards to: Kootenai National Forest Revision Plan Objection

Citizens for Balanced Use

Kerry White: Lead Objector

Kootenai National Forest Land Management Plan 2013 Revision.

Responsible Official: Faye L. Krueger – Regional Forester, Northern Region.

Statement of issues and/or parts of the plan revision which the objection applies:

I object to the fact that Kootenai National Forest, under direction from Region 1 of the USDA Forest Service, has adopted a policy for the management of Recommended Wilderness management areas that has not been properly assessed through the National Environmental Policy Act. This new policy has a significant impact on the public's ability to access lands historically used by motorized and mechanized use. Any significant action or proposal by a federal agency must follow the rules and guidelines of the National Environmental Policy Act (NEPA).

This new policy was never analyzed through NEPA and was initially formulated by Region 1 employee Tom Puchlerz in the form of a white paper. This significant proposed policy change was then adopted while Brad Powell was the Regional Forester; an in-house policy was adopted by the Region One Leadership Team that would require all RWAs to be managed as wilderness. Mr. Powell left in 2003 to work for an environmental organization, but his replacement, Abigail Kimball, immediately adopted and defended the policy. She was then promoted to Chief of the Forest Service and replaced as Regional Forester by Tom Tidwell. He too supported the RWA policy, and was promoted to the agency's top position, replacing Kimball as chief.

The assumption behind the policy statement seems to be that mechanized recreation (both motorized and bicycles) is automatically incompatible with RWA's. Our recreation pursuits are unquestionably prohibited in congressionally designated wilderness unless specifically exempted in the legislation, but may well be compatible with recommended wilderness. The proper test is whether or not the specific motorized/mechanized activity somehow compromises the area's future potential for designation as wilderness. That remains the official policy of the Forest Service today.

These areas of RWAs in the Kootenia National Forest have established uses of motorized and mechanized use in place today and it would seem the Forest Service believes these areas continue to qualify for wilderness designation and as such have recommended them for wilderness. The established use has therefore not devalued their wilderness character over the years and to remove these uses now is both arbitrary and capricious. The Forest

Service must justify their action of removing these uses in areas they admit the use has not degraded or devalued the wilderness character.

Representatives from Citizens for Balanced Use called on Ms. Kimball and questioned her about the policy. We left understanding that the policy was unwritten and there was **never any public involvement in its development**. It also was abundantly clear that she was not going to budge on her position; she believed it was a good policy, it made sense and it was going to remain in place. When Mr. Tidwell took Kimball's job in Region One, we called on him. It was his position that the motorized community should 'embrace' this policy because **the policy required the RWAs to be analyzed to determine if in fact they should retain this designation**. He then sent us a copy of the criteria to be used in the analyses process. The policy statement from Mr. Tidwell says under "Topic: Management of recommended wilderness" that the region "will be evaluating the areas that were recommended for wilderness designation in the first round of planning to determine if they should still be recommended. They also will be evaluating all other inventoried roadless areas to see if they should be recommended. For all of these areas, the forest needs to determine, through public involvement and the wilderness evaluation process, the best use of each area." **The document goes on to say that areas with a significant amount of motorized use should not be designated RWA's and if motorized use of an RWA was significant it would be removed from that designation or the boundary adjusted. (Attached FS Guidance document page 1)**

That was the first time we had received anything in writing about the elusive Region 1 policy concerning closure of RWA's to motorized recreation. We found the criteria for evaluation of wilderness potential seriously flawed and lacking. For example, we found no place where the ability to manage natural fire within the area boundary was addressed. We asked for an opportunity to comment on these criteria but heard nothing in response. To our knowledge this directive was never put in written form for public view until September 24, 2007. It is also important to note that it was at this point that it went from a 'policy' to 'guidance'.

Tidwell's September 24, 2007 directive says "If it is determined that the best future use is inclusion in the National Wilderness Preservation System, the desired condition (dc) should reflect that. If there are established uses that are incompatible with that dc, such as motorized or mechanized recreation, forests should choose to implement one of the following actions:

1. Pursue a non-motorized/non-mechanized approach to management of the area through travel planning,
2. **Adjust management area boundary to eliminate the area with established uses,**
3. Not recommend the area for wilderness designation."

What is likely one of the driving forces behind the policy was brought up in our conversation with Mr. Tidwell, reiterated in the Beaverhead-Deerlodge Forest Plan Revision DEIS and appeared again in the more recent Clearwater National forest Travel

Plan Revision DEIS. The agency fears that if motorized/mechanized use of an RWA continues or even expands, those recreationists will strongly oppose legislation designating it at some future time as wilderness; the more firmly we become entrenched, the harder we'll fight to stay there. By taking these uses out of the RWAs with travel plans the use is gone and they hope that opposition to designation gone.

Our greatest fear has been that the policy of Region One would become a national policy. That fear, considering the present administration and congress, is likely to happen. At least one Regional Forester and a Recreation staff member have confirmed that likelihood.

CBU objects to implementing a policy without following NEPA and the public process. This action of policy adoption of a significant action without due process of NEPA and public knowledge or ability for the public to comment is unacceptable. Removal of traditional and historic established use in order to designate recommended wilderness in a forest plan is both arbitrary and capricious and gives good cause for litigation. CBU requests the Forest Service reevaluate this illegal policy adoption until such time as a programmatic impact analysis is completed through NEPA and the public is afforded an opportunity to comment on this significant action under the requirements of NEPA.

Verification of the knowledge of this white paper proposed policy can be found on page 371 of the Appendices for the KNF FEIS. Plainly stated on page 371: "*A white paper provides consistency for management of Recommended Wilderness and Wilderness Study Areas across the Region 1*".

In direct contrast to this, I am in possession of a letter addressed to Citizens for Balanced Use executive board member Kerry White, from Region 1 Regional Forester Abigail Kimbell, (attached) dated January 24, 2006, which clarifies points discussed in a previous meeting:

The first point requesting clarification states: "1. Restrictions on motorized and mechanized use in Recommended Wilderness Areas are applied at the discretion of individual Forest Supervisors."

Mrs Kimbell states: "**This statement is true. We have not Regional policy or direction that requires that Forest or Grassland Supervisors to prohibit or allow motorized use in areas they recommend for wilderness designation in Forest Plans.** Supervisors may use their discretion when determining the management direction for Recommended Wilderness Areas in their Forest Plans. However, they must weigh these decisions very carefully to protect the values that qualify these areas for wilderness consideration"

Proposed Solution

Region 1 of the USDA Forest Service needs to suspend the management policies for Recommended Wilderness Management Areas and Wilderness Study Areas, which are based on the management policy recommendations stated in the "white paper" referenced

in the response, until such time as the implications of those management policies have been properly evaluated according to the NEPA process, and the public has had sufficient opportunity to comment on those management policies.

In addition, part of this objection, I would like to formally request at this time, a copy of the "white paper" which is referenced in the response on page 371 of the FEIS Appendices quoted above."

Statement demonstrating the link between the objection and prior formal

comments: This is a new issue that has emerged between the release of the KNF DLMP and KNF Final Plan revision. Therefore, no previous comments on this issue should be necessary. However, I was commenter #357 on public comment numbers 4,12,19,23,30,31,141,143,248,263 and 310 which all relate to this issue and the historic use of motorized and mechanized use of RWAs, the process for determining that use, the analysis required to continue, adjust or restrict that use, and the question of guidance provided by the agency.

CBU objects to the Kootenia Land Management Plan FEIS in its violation of EO#13575

Executive Order #13575 – Establishment of the White House Rural Council dated June, 9th, 2011 states under Section 1. Policy: "The Federal Government has an important role to plan in order to expand access to the capital necessary for economic growth, promote innovation, improve access to health care and education, **and expand outdoor recreational activities on public lands**"

Comment: In contrast to this Order, none of the proposed alternatives to the DFMP appear to expand outdoor recreational activities on public lands. CBU requested an alternative in our letter number 357 which followed Executive Order #13575 which was responded to unsatisfactorily in comment response number 79. Why?

Along these same lines, I don't believe that the FS can argue that besides Lake Koocanusa, the Ten Lakes Area is easily the most popular and highly used recreation area in north Lincoln County. It would also be difficult for the FS to dispute that the Ten Lakes Area offers the largest diversity of recreational opportunities of any area on the KNF.

If the FS is obligated by EO#13575 to "expand outdoor recreational activities on public lands", the FEIS is more restrictive forest management on the Ten Lakes Area and thousands of acres adjacent to the TLA, effectively reducing the diversity of recreational opportunities available in the second most popular recreational area on the KNF and in violation of Executive Order 13575. Also, many of the comments found in the Analysis of Public Comment report, advocate increased access to the forest, and increased recreational opportunities in compliance with Executive Order 13575. With this in mind why is the FS proposing to reduce access to the forest, and reduce recreational

opportunities in many areas including removal of existing historic and established uses in areas arbitrarily selected.

CBU objects to implementing the proposed Kootenai National Forest Land Management Plan as it does not comply with the County Resource Plans and no Coordination was ever engaged in between the local governments and the federal agencies as required under federal law. The FEIS simply makes a statement that counties were notified of the proposed action and the final plan states "All county plans were considered as the planning process developed." Because the final Kootenia Land Management Plan does not reflect or follow the county plan the Forest Service must respond in the FEIS as to why their final plan cannot be consistent with the county plan. This was not addressed in the FEIS and **CBU objects to implementing a plan without the required formal coordination and an explanation as to why the Forest Service Plan is not consistent with the county's plan.**

CBU objects to the FEIS Kootenai Forest Land Management Plan objection process as it was adopted after the initial Kootenai Land Management proposal had begun. Once a process for a proposed action is noticed (published NOI) to the public, this process must remain in place. The Kootenai Forest Land Management Plan was initiated under the 1982 Planning Rule after subsequent changes and litigation of the several planning rules.

Page ii of the Draft Land Management Plan dated December 2011 states: "*On May 12, 2006, the Forest released the Proposed Land Management Plan under the 2005 Planning Rule. Public comments on the proposed Plan were analyzed and summarized in a report (the Analysis of Public Comment Report, March 2007). Based on public and agency comments, the revision team began development of the final plan. A court injunction (March 30, 2007) resulted in suspension of the Forest Plan revision activities under the 2005 Planning Rule. The 2008 Planning Rule was released in April of 2008 and Forest Plan revision resumed under that rule. A final Plan release was anticipated for winter of 2009 when the court ruling invalidated the 2008 Planning Rule in June 2009. The 2000 Planning Rule was reinstated in December of 2009. The 2000 Planning Rule was amended in 2002 to allow the Forest Service to **follow the procedures of the 1982 Planning Rule.** The Forest issued a second NOI in March 2010 to revise the Forest Plan using the 1982 procedures under the 2000 Planning Rule. All the public comment received on the various Forest Plan revision products over the life of the Plan revision have been used in developing the draft Forest Plan and draft environmental impact statement.*"

Now again the Forest Service is changing the Rule in which this Forest Plan is being revised but this time there was no NOI issued. The process for objecting to this FEIS is completely different than what was initially indicated and communicated to the public. The 1982 Rule allows for a formal appeal process and subsequent court review. The pre-decisional objection process is part of the new 2012 Planning Rule and was never a part of this plan process until after the process was started and the DEIS was released.

As this is a significant and substantial issue not disclosed until after the release of the Kootenai Forest Land Management Plan, **CBU strongly objects to this arbitrary and capricious use of an alternative process of objection without proper public notice.** Several times this Forest Plan revision process has been changed and all previous changed process resulted in suspension of the plan process until a new process could be identified and correctly noticed to the public.

Citizens for Balanced Use (CBU) **objects to the closures of motorized and mechanized use in areas newly designated as Recommended Wilderness Areas in the Kootenai Forest Land Management Plan without completing site specific road and trail analysis through a Travel Management Plan.**

The attached copy of the letter dated October 4, 2007 to Sandra Mitchell from Tom Tidwell includes on page 1 of the "Guidance document" for motorized and mechanized use in Recommended Wilderness Areas. Specifically this Guidance document states: "Pursue a non-motorized/non-mechanized approach to management of the area through travel planning." The Forest Service has violated this guidance in removing established motorized and mechanized use through land management planning rather than completing a more site specific travel planning process.

The Forest Service is being arbitrary and capricious by removing motorized and mechanized use in recommended wilderness areas through a land management action without site specific analysis of these roads and trails. CBU requests the Forest Service remand this decision until the guidance of addressing motorized and mechanized use is followed.

The 2001 3 State OHV Rule required site specific trail inventory and analysis before any closures were implemented. The action of closures of trails in the Kootenai Land Management Plan to motorized and mechanized use without completing the required trail inventory and analysis violates this 3 state rule. CBU provided comments in regards to this issue in our letter number 357 which the Forest Service responded to in comment numbers 248, 142, 29, and 4. CBU is not satisfied with the response from the Forest Service and **objects to the implementation of the Kootenia Land Management Plan without completing site specific trail inventories and analysis.**

Kerry White



Executive Board
Citizens for Balanced Use



United States
Department of
Agriculture

Forest
Service

Region One

Northern Region
200 East Broadway
Missoula, MT 59802

File Code: 2350

Date:

JAN 24 2006

Mr. Kerry White
Citizens for Balanced Use
P.O. Box 606
Gallatin Gateway, MT 59730-0606

Dear Mr. White:

I appreciate you, Brad Grein and Ken Zahn taking the time to meet with us to discuss our travel planning efforts in the Region. You ask that we clarify the points we discussed at our meeting. The following are the five statements to be clarified with our responses.

1. *Restrictions on motorized and mechanized use in Recommended Wilderness Areas are applied at the discretion of the individual Forest Supervisors.*

This statement is true. We have no Regional policy or direction that requires Forest or Grassland Supervisors to prohibit or allow motorized use in areas they recommend for wilderness designation in Forest Plans. Supervisors may use their discretion when determining the management direction for Recommended Wilderness Areas in their Forest Plans. However, they must weigh these decisions very carefully to protect the values that qualify these areas for wilderness consideration.

2. *East Side Recreational Analysis is being used in formulation of Forest travel plans.*

The East Side Recreational Analysis is a tool that we may use as background and reference material for the formulation of travel plans as well as soil, water, and wildlife analyses. The East Side Recreational Assessment is not a decision document. It is usually used as a reference tool when doing travel planning.

3. *"Desire to separate user types" is being used to justify some area closures of motorized use.*

"Desire to separate user types" is not a justification we use for motorized route closures. What we generally strive for is to meet the needs of all users at the highest level possible while protecting the resources, minimizing user conflict, being consistent with laws and providing maintainable routes. Occasionally, it is necessary to separate user types to meet these goals, however, desire to separate user types is not a justification or goal we use.

4. *The Forest Service does not have the resources available to do an extensive trail inventory and analysis as required by the 3 State, 2001 OHV rule.*

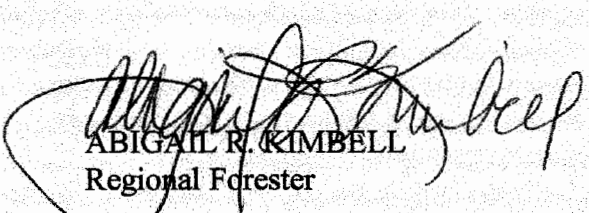
The 3 State, 2001 Decision was a decision and Land Management plan amendment. This decision did not require Forests or Grasslands to complete an extensive trail inventory or analyses; only to identify their high, medium and low priority wheeled motorized areas. This decision also required Units to begin site specific travel planning analyses on the high priority areas within six months and the medium areas within two years of the decision. No time frame was identified for beginning travel planning for the low priority areas. Doing a complete inventory of all routes that includes all of the non-system routes that may exist on the landscape, can be a very costly process and is usually not needed for most travel planning efforts. The new Forest Service National Travel Management Rule does not require a 100% inventory or analysis of all routes. The comment and response section of the November 9, 2005 Federal Register publication of this rule requires a public process that completes an inventory and analysis of feasible and possible routes that considers user created routes and user proposed routes, that may not even exist on the ground.

5. *The Forest Service acknowledges the lack of adequate enforcement and signage.*

Providing adequate enforcement and signage is always a challenge. With finite funding for law enforcement we do not have law enforcement officers at every location. Nor can we keep every route signed at a high level. We are making an effort to provide information to users. National Trails Program grants have been used to fund OHV trail rangers on many Ranger Districts. These trail rangers provide an increased Forest Service presence on roads and trails and we hope this increased agency presence will lessen illegal use and assist our law enforcement program. The new Travel Management Rule requires units to designate routes and areas for motor vehicle use. One enforcement tool will be a motor vehicle use map that will be published each year after we have completed travel planning. This new policy should make enforcement and signing efforts more efficient.

Thank you again for your interest in travel planning and management in the Region. If you have questions regarding this letter or require further clarification of OHV issues, please contact John Favro at 406-329-3150.

Sincerely,



ABIGAIL R. KIMBELL
Regional Forester

cc: Forest and Grasslands Supervisors



United States
Department of
Agriculture

Forest
Service

Region One

Northern Region
200 East Broadway
Missoula, MT 59802

File Code: 1950/2320

Date:

OCT 04 2007

Sandra Mitchell
Public Lands Director
Idaho Snowmobile Association
P.O. Box 70001
Boise, ID 83707

Dear Ms. Mitchell:

Thank you for taking time to meet with us in Missoula last month. I appreciate having the opportunity to share my thoughts on management of recommended wilderness and hear your concerns on how snowmobilers would be affected.

In our meeting you asked to see, in writing, the guidance that has been provided to the field on management of recommended wilderness. Enclosed is a paper that has been developed to provide consistency across the Region. I also am enclosing an explanation of the methodology and process that the forests and grasslands are using to determine which of the roadless areas should be considered for recommendation for inclusion in the National Wilderness Preservation System. I hope you will see that the process is very rigorous and intended to eliminate from consideration those areas that are really best suited for uses that are not compatible with wilderness designation. The final decision on which areas to recommend is done through a thorough and open public involvement process.

My hope is that you and your constituents are active players in these discussions.

Sincerely,

THOMAS L. TIDWELL
Regional Forester

Enclosure



Consistency in Land and Resource Management Plans

Topic: Management of recommended wilderness

Purpose: During plan revision, the national forests and grasslands will be evaluating the areas that were recommended for wilderness designation in the first round of planning to determine if they should still be recommended. They also will be evaluating all other inventoried roadless areas to determine if they should also be recommended. For all of these areas, the forest needs to determine, through public involvement and the wilderness evaluation process, the best use of each area.

Guidance: If it is determined that the area is best suited to motorized or mechanized recreation, the area should not be recommended for wilderness. If it is determined that the best future use is inclusion in the National Wilderness Preservation System, the desired condition (dc) should reflect that. If there are established uses that are incompatible with that dc, such as motorized or mechanized recreation, forests should choose to implement one of the following actions:

1. Pursue a non-motorized/non-mechanized approach to management of the area through travel planning
2. Adjust management area boundary to eliminate the area with established uses.
3. Not recommend the area for wilderness designation.

Administrative use of motorized equipment for maintenance (chain saws, rock drills, limited use of helicopters) will continue to be allowed.

Background: Through the first round of planning, approximately 1.3 million acres of inventoried roadless was recommended for wilderness designation. The plan standards for most of those areas allowed for existing uses to continue as long as they did not degrade wilderness character. These standards are vague and have resulted in problems:

- **Lack of understanding of wilderness characteristics.** There has been some confusion over how wilderness characteristics are defined and what activities or what level of use would result in degradation of wilderness characteristics. In some areas, uses have changed or certain types of use have increased significantly, possibly degrading wilderness characteristics. In most cases, use has not been monitored closely enough, if at all, to make a call on how use has changed over the years.
- **Inconsistent management of recommended wilderness across the region.** Some areas are managed by more than one unit and the units have different management approaches, particularly for motorized recreation. This results in public confusion and can result in encroachments of illegal activities on to the adjacent forest.

Wilderness Characteristics

National Wilderness Monitoring Committee

Untrammeled—Lack of evidence of human control or manipulation.

- Prescribed fire
- Fire suppression
- Rehab with non-native species
- Mechanical fuel reduction

Undeveloped or "Does not Occupy"—Lack of evidence of modern human presence, occupation, modification.

- Signs
- Structures
- Road and trails
- Special provisions; livestock grazing, electronic sites, etc.

Natural—Ecological systems are substantially free from effects of modern civilization.

- Exotic species
- Changes to air quality
- Changes to water quality
- Effects of past timber harvest

Opportunities for solitude or primitive and unconfined recreation—Remoteness, solitude, freedom, risk, challenge.

- Human noise
- Sights of human civilization
- Number of people/parties
- Types of use; motorized, mechanized

KIPZ FOREST PLAN REVISION
IRA EVALUATION FOR WILDERNESS
EVALUATION METHODOLOGY AND PROCESS
Version 7/26/05

METHODOLOGY

The 85 Inventoried Roadless Areas (IRA)¹ on the Kootenai and Idaho Panhandle National Forests revision zone (KIPZ) will be evaluated for suitability for wilderness recommendation. The three tests of capability, availability, and need will be used to determine suitability as set forth in Forest Service Handbook (FSH) 1909.12, Chapter 72.² In addition to the inherent wilderness quality an IRA might possess, the area must provide opportunities and experiences that are dependent upon and enhanced by a wilderness environment. The area and boundaries must allow the area to be managed as wilderness.

Capability is defined in FSH 1909.12, Chapter 72 as the degree to which the area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness. **Availability** determination is conditioned on the value of and need for the wilderness resource compared to the value of and need of the area for other resources. **Need** is the determination that the area should be designated as wilderness through an analysis of the degree that the area contributes to the local and national distribution of wilderness.

Capability

There are five basic characteristics identified to evaluate the capability of an IRA: environment, challenge, outdoor recreation opportunities, special features, and manageability.

The environment provides the person the opportunity to feel or experience solitude and serenity, a spirit of adventure and awareness, and a sense of self-reliance. The area needs to appear natural and free from disturbance and where the normal activities and life cycles of biotic species take place. A range of geological, biological, and ecological variability exists and is identified. Any scientific, educational, or historical values are identified and considered. Social and economic factors must blend with the environment and natural features to make the area desirable and manageable as wilderness.

1. There are 48 IRAs on the Idaho Panhandle NF and 43 IRAs on the Kootenai NF. Six of the IRAs are located on both forests. They are counted separate for each forest but only once for the planning zone.

2. This chapter of FSH 1909.12 was reissued in March 2005. Changes in the new issue included using new chapter numbers and the use of some new terminology. It did not alter the direction for analysis or the evaluation process. The methodology and process used to evaluate the IRAs in KIPZ meet the March 2005 handbook direction. Chapter numbers used in this document reference the March 2005 handbook.

Challenge considers the degree that the area offers people the opportunity to experience adventure, excitement, challenge, initiative, or self-reliance.

Outdoor recreation opportunities that are primitive and unconfined include hiking, backpacking, stock riding, hunting, fishing, skiing, snowshoeing, and rafting. These may or may not currently exist within an individual area. Other outdoor recreational activities may currently exist but are not compatible with a wilderness setting or other wilderness characteristics.

Special features recognize scientific, educational, historical, and scenic values found in the area. The abundance and variety of wildlife and fish, including threaten and endangered species, will be considered. Other special features that are unique or are outstanding will be identified.

Manageability considers the ability to manage the area as wilderness as required by the 1964 Wilderness Act. Such factors as size, shape, and juxtaposition to external situations are considered. Boundary location and the ability to easily identify the boundary on the ground are critical in meeting this characteristic.

The combinations of basic natural characteristics are of infinite variety. No two areas possess any of these characteristics in the same measure. The process, then, is to analyze the quality and quantity of these characteristics and determine if they can be provided by establishing management, protective, mitigation, or enhancement measures.

In order to evaluate the five basic characteristics, they will be broken down into elements, activities, or features that describe the basic characteristics and provide a basis for rating. At least two criteria will be established for each element, activity, or feature with three criteria considered optimal. While there is no limit on the number of criteria that can be established, the number of criteria must be kept to a number that can reasonably provide for evaluation of the characteristics. Since criteria will probably not be of equal importance, criterion will be listed in order of priority for each element, activity, or feature. Criteria will be established to consider existing as well as future conditions both inside and adjacent to the IRA.

Forest and district resource specialists and managers will rate the criterion as high, medium, or low depending on how well the criterion is or can be met in the IRA. For IRAs that crossed forest boundaries, the criteria will be evaluated only for the portion that lies within the Kootenai or Idaho Panhandle Forest boundary. Final evaluation of these IRAs will not be completed until reconciliation with the adjoining forest can be made.

Three specialists from each of the two forests in the zone will then evaluate the elements, activities, or features based on the criteria rating given in the first evaluation. The IRA will then be given a summary rating of high, moderate, or low in capability. Methodology will use three Forest Service specialists who are familiar with the IRA along with three that generally do not know the IRA and will be limited to the criteria ratings and comments provided by the districts during the first evaluation.

Availability

Availability of an IRA for wilderness management must be evaluated against other resource needs, demands, and uses of the area. To be available for wilderness, the wilderness value, both tangible and intangible, should offset the value of the other resources. The predominant value does not necessarily reflect the use or combination of uses that would yield the greatest dollar return or the greatest unit output. In evaluating other resources, current uses, trends, and potential future uses and outputs need to be considered.

Wilderness designation and management of an area can have an effect on the management of adjacent lands. Therefore, evaluation of other resource needs may need to be considered in the area adjacent to an IRA. FSH 1909.12, Chapter 72.21 provides some examples and guidance in evaluating the development and management for sustained yield production of resources other than the wilderness resource.

Other resources to be evaluated will be determined from resource specialists' knowledge of the areas and public comments. Once the resources have been identified, criteria will be established for evaluation. Forest and District resource specialists will rate the criteria as high, medium, or low. Two to six forest program managers will then evaluate each IRA's availability for wilderness designation.

Need

The need for an area to be designated as wilderness will be through an analysis to determine the degree the area can contribute to the local and national distribution of wilderness. There should be clear evidence of current or future public need for additional designated wilderness in the general vicinity of the area being considered. This evidence will include public involvement. Need analysis will use such factors as the geographic distribution of areas, representations of landforms and ecosystems, and the presence of wildlife expected to be visible in a wilderness environment.

To best analyze the need for additional wilderness in the Northern Region, the Regional Forester decided the needs assessment would be completed at the Regional level. Once that assessment is completed, two to six program managers will use the assessment to rate the IRAs for need of additional wilderness designations. A rating of high, moderate, or low will be assigned to each IRA.

Suitability of an IRA for potential wilderness designation will be based on the inherent wilderness quality determined in the capability, availability and needs assessment. In addition to the inherent quality, the area must provide opportunities and experiences that are dependent upon and enhanced by a wilderness environment. The size and shape of the area must allow the area to be managed as wilderness. Forest Land Managers will review the evaluation and determine which IRAs are suitable for wilderness designation.

Proposed wilderness boundaries and mapping will be completed following the guidelines in FSH 1909.12, Chapter 72.5 for each IRA determined to be suitable. Boundaries must

be easy to define, locatable on the ground, and must be manageable. Priority of boundary in descending order of desirability is:

1. Use natural features locatable on both a map and on the ground, such as a ridge top, mountain peak, or lake shore.
2. Use semipermanent human-made features such as roads and powerlines. The boundary may be set back a given distance from these features.
3. Use previously surveyed lines or legally determined lines such as section and township lines, property lines, or State boundaries.
4. Use a straight line from one locatable, visible point to another, such as between two mountain peaks.
5. Use a series of bearings and distances between locatable points that are not visible.

PROCESS

Evaluation of the 85 IRAs for wilderness suitability and recommendation was based on the methodology established above. IRAs that crossed the Kootenai and Idaho Panhandle National Forests boundaries but remained totally within the KIPZ revision boundary were rated first for the respective forest, then given a consolidated rating for the zone. IRAs that crossed the KIPZ boundary on to the Flathead, Lolo, Clearwater, or Colville National Forests were not given an overall rating until the adjacent forest had provided evaluation comments. Coordination of IRA evaluation with adjacent forests was completed in December 2004.

The results of each step or test established in FSH 1909.12, Chapter 72 are provided below.

Capability

Methodology required identifying elements, activities, or features that described the basic characteristics and provided a base for rating. This was completed by the two Forest Recreation Program Managers and assisted by a NEPA Specialist and the Forest Planners. The format was adapted from the White River National Forest in Colorado. Work began in September 2002 and was completed in early June 2003.

The five basic characteristics were broken down into 19 elements, activities, or features. A total of 47 criteria were established and used to rate each of the 85 IRAs. Generally each criterion listed first for an element, activity, or feature received a heavier weighting in evaluation than the following criteria. Criteria were established to consider existing as well as future conditions both inside and adjacent to the IRA.

Evaluation of the criteria was performed by District Recreation Managers, Forest Fishery and Wildlife Biologists, and Forest Hydrologists. Each criterion was rated as high, medium, or low. For IRA's that crossed forest boundaries, the evaluation was only for the portion that lies within the Kootenai or Idaho Panhandle Forest boundary. This evaluation was completed in June 2003.

In December 2003, three specialists from each of the two forests in the zone rated the 19 elements, activities, or features as high, medium, or low based on the rating given in the first step. The IRA was then rated as high, moderate/high, moderate, moderate/low, or low in capability. The moderate/high and moderate/low ratings were used only when an IRA did not clearly fit in one of the ratings established in methodology and was considered in a transition area between two established ratings. Specialists for each forest consisted of the Forest Recreation and Wilderness Program Manager and two District Resource Managers.

Table IRA-1 shows the 19 elements, activities and features and the 47 criteria used to rate the 85 IRAs.

Table IRA-1: AREA CAPABILITY ASSESSMENT ELEMENT AND CRITERIA

ENVIRONMENTAL ELEMENTS		
Opportunity for Solitude		
High	Medium	Low
Feeling of being alone or remote from civilization.	Feeling of being alone is possible but signs of civilization are likely.	Little opportunity of feeling alone.
The possibility of meeting another party is remote.	The possibility of meeting or not meeting another party is about equal.	It would be rare to not meet another party.
Recreation use is light.	Recreation use is moderate.	Recreation use is high.
Natural and Free from Disturbance		
High	Medium	Low
IRA appears free of human disturbance. Any disturbance appears to be natural, such as a small wildfire.	IRA appears mostly free of human disturbance. Natural disturbance evident, but does not dominate the landscape.	IRA shows signs of human disturbance. Natural disturbance dominates the landscape, such as a stand replacing wildfire.
Area visible in surrounding foreground (outside the IRA) may show some human disturbance but does not dominate the view.	Area visible in surrounding foreground has signs of human activity such as a road or farmhouse.	Area visible in surrounding foreground shows obvious human activity such as clearcuts or a town.
Has only a minor improvement, such as a trail.	Has several minor improvements.	Has a major improvement such as a power line, dam, or road.
Noxious weeds not evident.	Noxious weeds evident in isolated spots.	Noxious weeds common or scattered throughout the area.
High water quality. Fully supports beneficial uses.	Good water quality. Partially supports beneficial uses.	Poor water quality. Does not support beneficial uses.
Provides Challenge and Adventure		
High	Medium	Low
Terrain generally rugged.	Terrain typical for general forest area.	Terrain more gentle and rolling.
Requires above average physical ability, knowledge,	Requires similar physical ability, knowledge, or skill	Area easily accessible; requires average physical

or skill to safely recreate in the area.	as the general forested area.	ability, limited knowledge and skill as compared to the abilities required in the general forest area.
Nonhunting outfitting permitted within area.	Nonhunting outfitting permitted but rarely used.	Nonhunting outfitting not permitted within area.
Manageable		
High	Medium	Low
Size and shape of area allows for effective management.	Size or shape will affect manageability but can be mitigated by boundary changes.	Size is small or has irregular shape that makes management difficult.
Minimum activity in surrounding area that effects manageability	Activity is evident and ongoing in surrounding area but will not keep the area from being managed	Activity in surrounding area will effect the manageability of the IRA
Located adjacent to existing Wilderness or other IRAs	Located near existing Wilderness or other IRAs. May be difficult to access.	Isolated, small parcel of land
SPECIAL FEATURES		
Scientific, Educational, or Historical Values		
High	Medium	Low
Several significant scientific, educational, or historical values have been identified in the IRA	At least one significant or several minor scientific, educational, or historical values have been identified in the IRA	No scientific, educational, or historical value has been identified in the IRA
Identified values are unique to the northern Rockies.	Identified values are common in northwestern US but is uncommon on KIPZ	Any identified values are common through out KIPZ and northwest US.
Scenic Features		
High	Medium	Low
Area has peaks or rocky formations considered spectacular from the rest of the Forest and/or special vegetative features that are considered very scenic.	Area has a peak or formation that stands out from surrounding terrain and/or vegetative features considered scenic.	Terrain is typical of the forest or surrounding area and the vegetation is common to the surrounding area.
Area has alpine lakes, creeks in alpine meadows, or waterfalls.	Area may have bodies of water but are typical for the Forest.	Area has no permanent lakes but may have perennial creeks or ponds.

Variety and Abundance of Wildlife		
High	Medium	Low
There is a diverse community of native mammals, birds, and fish.	There is a moderate variety of native mammals, birds, and fish.	The community of native mammals, birds, and fish is not diverse.
There is a known high variety of TE&S Species within the IRA.	There is a known moderate variety of TE&S Species within the IRA.	There is a known low variety of TE&S Species within the IRA.
Overall wildlife habitat integrity rating of high	Overall wildlife habitat integrity rating of moderate	Overall wildlife habitat integrity rating of low
Provides critical linkage between wildlife areas or habitats	Provides linkage between wildlife areas or habitats	Does not provide linkage between wildlife areas or habitats
Other Special Features		
High	Medium	Low
Area has at least one major other special feature, such as a grove of western red cedars, high mountain meadow, bog, etc.	Area has several minor other special features, such as old growth stand, flat creek bottom, or small water falls.	Area has no major or very few minor other special features
Contains a designated special area such as a W+S River or SIA, etc.	Contains a candidate or eligible special area.	Does not contain an established, candidate, or eligible special area.
PRIMITIVE AND UNCONFINED RECREATION		
Hiking Opportunities		
High	Medium	Low
Two or more trails, class 3 or higher, that are routinely maintained	At least one trail, class 2 or higher, that is routinely maintained	No system trails that are maintained
Terrain is gentle and vegetation open to allow easy cross-country travel	Terrain is moderate or vegetation brushy that impedes cross-country travel	Terrain is steep or vegetation too dense (including down material) that cross-country travel is difficult
Backpacking Opportunities		
High	Medium	Low
Two or more trails, class 3 or higher, that are routinely maintained	At least one trail, class 2 or higher, that is routinely maintained	No system trails that are maintained
Area has several dispersed camping sites that are routinely used	Area has at least one dispersed camping site that is occasionally used	Area does not have dispersed camping sites that are used but progressive

		camping may occur
Saddle Stock Opportunities		
High	Medium	Low
At least one trail, class 3 or higher, designed for saddle stock and routinely maintained	At least one trail, class 2 or higher, that is suitable for saddle stock and routinely maintained	No system trails that are maintained
Trailhead has stock facilities, such as unloading ramp	Trailhead has room to turn around stock truck or stock trailer	Trailhead does not support use of stock
Hunting Opportunities		
High	Medium	Low
Good populations of the big game animals or fair population of permitted animals, such as sheep or goats	Has fair populations of game animals	Has scattered small herds of big game animals
Terrain is gentle and vegetation open to allow easy hunting access off trails and ridges	Terrain is moderately steep or vegetation brushy that limits hunting on much of the area	Terrain is steep or vegetation too dense that hunting is limited to trails or ridges
Fishing Opportunities		
High	Medium	Low
Good populations of native game fish	Has fair populations of native game fish	Has low populations of native game fish
Stream bottoms are generally gentle with minor brush allowing access to water	Stream channel has enough brush to limit access; channel bottom or side slopes not overly steep	Stream channel steep, or steep rocky side slopes, or brush along channel makes access difficult
Skiing and Snowshoeing Opportunities		
High	Medium	Low
Terrain is gentle and vegetation open to allow easy cross-country travel	Terrain is moderate or vegetation brushy that impedes cross-country travel	Terrain is steep or vegetation too dense that cross-country travel is difficult
Area is easily accessible in winter by motorized wheel vehicles	Snow keeps wheeled vehicles several miles from area but access is possible by snowmobile	Area is difficult or rarely accessed by snowmobile

Snowmobiling Opportunities		
High	Medium	Low
Terrain is steep or vegetation too dense that cross-country travel is difficult	Terrain is moderate or vegetation brushy that impedes cross-country travel	Terrain is gentle and vegetation open to allow easy cross-country travel
Snowmobile use prohibited, or if allowed, rarely used	Snowmobile use restricted to two months or less, or on half or less of the area	Snowmobile use permitted.
MANAGEABILITY – THE EXTENT THAT		
Area Boundaries are Recognizable		
High	Medium	Low
The vast majority of the boundary follows features that can be easily found and identified on the ground, such as a dominate ridge, creek, road, or trail	More than half of the boundary follows a feature that can be easily found and identified on the ground	Boundary generally lies across the hill side and can rarely be located without equipment, such as a gps unit
Boundary can be easily adjusted to follow locatable and identifiable features without significantly modifying the area boundaries	Boundary can be adjusted to follow locatable and identifiable features but will modify the general size and shape of the IRA. Boundary may be identified with minimal signing.	Boundary can not be adjusted to follow locatable and identifiable features, or requires extensive signing.
Area Boundaries promote Remoteness		
High	Medium	Low
Area accessed by trail or closed and revegetated road; adjacent area has natural setting	May be accessed by narrow or two track open road that is lightly traveled; minimal human presence evident	Boundary adjacent to heavily used road or along area showing high human presence, such as a number of farm houses with outbuildings, pasture land, etc.
No active disturbance near boundary	May have disturbance near boundary but is short term such as a logging operation.	Boundary adjacent to long term disturbance like farmland or mining operations
Natural processes take place undisturbed and unmanipulated.	Minimal disturbance of natural processes.	Natural processes cannot occur without human intervention.

Area Boundaries are Manageable		
High	Medium	Low
Boundary total on National Forest and not adjacent to private property	Boundary follows property line forming irregular shape.	Boundary crosses private property so there are inholdings along the boundary.
No inholdings.	Few small inholdings may be present.	Several small or a large inholding.
Area Boundaries Constitute Barrier to Prohibited Use		
High	Medium	Low
Topographic feature provides a natural barrier, such as major stream or steep hill side	Topography generally makes it difficult to participate in prohibited use	Topography not a deterrent to prohibited use
Human improvement is significant to physically provide a barrier, such as a road cut slope	Human improvement places user on notice of prohibited use, such as a sign.	Human improvement not a deterrent; may provide point of access of prohibited use

Table IRA-2 shows the rating for each criteria and element and the overall rating for each IRA.

Add the table.

Availability

While Capability evaluated the wilderness characteristics of an IRA, Availability considered other resources needs. FSH 1909.12, Chapter 72.2 and internal and external comments were used to identify other resources for evaluation and establish the criteria. Eight criteria were established by the two Forest Recreation and Wilderness Program Managers in August 2004. The two managers selected resource specialists from each forest to rate the criteria using a high, medium, or low rating system. Specialists included recreation managers, wildlife and fishery biologists, hydrologists, ecologists, geologists, fuels and wildfire specialists, land specialists (special use permits), and Silviculturists. These ratings were completed by October 2004.

Individual district and forest specialists rating and resource needs were summarized for each IRA. An overall availability rating was then established by the two forest program managers. This was completed in December 2004.

Table IRA-3 lists the eight resources and criteria. The availability for an area for proposed wilderness designation will be the opposite of the rating for other resource requirements. For example, a rating of high mineral value will mean a low rating for wilderness designation.

Table IRA-3: AREA AVAILABILITY RESOURCE ASSESSMENT AND CRITERIA

RESOURCES
1. Areas that are of high value for water yield or on-site storage where installation and maintenance of improvements may be required.
2. Areas needing management for wildlife or aquatic animals that MIGHT conflict with Wilderness management.
3. Area needing active aquatic restoration activities.
4. Area needing active vegetative restoration activity due to specific species survival, or identifiable fuel reduction activity to reduce the risk of catastrophic wildfire, or known areas of severe insect infestation that will lead to heavy tree mortality.
5. Areas of high value mineral deposits of economic or strategic importance.
6. Areas having such unique characteristics or natural phenomena that general public access should be developed to facilitate public use and enjoyment including winter sports sites.
7. Lands committed through contracts, permits, or agreements that would be in conflict with Wilderness management (some minor permitted uses may still be allowed.)
8. Forest Service does not have sufficient control to prevent development or irresolvable, incompatible uses that would lessen wilderness character and potential.
RATING
HIGH = Areas having an evidence and high priority need for treatment in the category addressed in the question. Availability would equate to Low.
MEDIUM = Areas having a need for treatment in the category addressed in the question. Availability would equate to Moderate.

LOW = Areas have no to little need of treatments or management addressed in the question. Availability would equate to High.

Table IRA-4 shows the ratings determined for each resource and the overall rating for each IRA.

Add table.

Need

After evaluating an area's capability for providing wilderness characteristics and availability for wilderness designation, the last step of the evaluation process is to determine if the area is needed as part of the National Wilderness Preservation System. A Wilderness Needs Assessment was completed in 2003 by an interdisciplinary team at the regional level. This allowed the assessment to cover Montana, northern Idaho, and parts of the Dakotas – a much larger area than the KIPZ. The assessment focused on social and ecological factors. The social factors included current levels of use in designated wilderness in the Northern Region, national and local trends in outdoor activities, and population statistics. Ecological factors included representativeness of vegetative cover types and ecological sections, fisheries, and wildlife. A copy of the Northern Region Wilderness Needs Assessment is attached as Appendix A.

Since the regional needs assessment covers a large and diverse area, it could not address individual IRA's. The two Forest Recreation and Wilderness Program Managers met in December 2004 to apply the regional needs assessment to the 85 IRAs in the KIPZ. The assessment was broken down into six questions and each IRA rated high, moderate, or low. Maps created for the regional assessment were available and used to determine the significance of the resource being addressed by each question to every individual IRA. Table IRA-5 shows the six questions and the rating criteria used to determine need.

Diversity within KIPZ and application of the broad regional needs assessment required that ratings be established for individual IRA's, for individual forests, for portions of a forest, or for the zone. Ratings for questions 1 and 2 were determined for each IRA based on the presence or absence of the species being addressed. Question 3 was split based on whether the IRA was located adjacent to an existing wilderness boundary or located near another IRA. A rating was determined for either 3a or 3b, but not both. A rating for Question 4 was determined for the entire forest or section of forest. It was split for the Idaho Panhandle between the north and south halves but only one rating was used for the Kootenai Forest. A single population center was selected for each forest from the list in the regional needs assessment for question 5. Couer d'Alene, Idaho was selected for the population center for the Idaho Panhandle Forest. Kalispell, Montana was selected as the population center for the Kootenai. For Question 6, each forest produced a map that showed the four selected under-represented plant communities that are typically available in the KIPZ. The four selected were Vegetation Response Units (VRU) 2 (ponderosa pine), 5 (western red cedar and western hemlock), and 8 (western red cedar and western hemlock – wet) and Aquatic Response Unit (ARU) types representing forest-dominated riparian areas. Other under-represented communities were not considered because they do not exist or are only found in small quantities within the IRAs.

An overall rating was then applied for the IRA based on the following parameters:

The overall rating would be high if:

- Three or more questions were rated high, or
- Two questions were rated high and at least two of the remaining four questions were rated moderate.

The overall rating would be moderate if:

- Two questions were rated high and not more than one of the remaining four questions was rated moderate, or
- One question was rated high and at least one of the remaining five was rated moderate, or
- No question was rated high but two or more were rated moderate.

The overall rating would be low if:

- Five of the questions rated low, or
- No question was rated high and no more than two were rated moderate.

Table IRA-5: AREA NEEDS ASSESSMENT AND CRITERIA

Questions	High	Moderate	Low
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Presence of 2 fish	Presence of 1 fish	None of the species present
2. Presence of sensitive plant species.	Sensitive plant(s) identified in IRA are globally rare	Sensitive plants identified in IRA would benefit from wilderness designation = moderate/high Sensitive plants present in IRA = moderate/low	No sensitive plants identified in IRA.
3a. Areas adjacent to existing Wilderness (larger reserved size beneficial for wildlife conservation.)	IRA is adjacent to existing Wilderness boundary	IRA adjacent but separated by corridor	Not applicable
3b. IRAs could be combined to form large habitat patches.	Two or more IRAs adjacent and separated only by a narrow corridor, such as a road.	Two or more IRAs could be connected by a wildlife travel corridor.	IRA not adjacent or close to another IRA
4. Ecological Sections represented in Wilderness.	Ecological Section represented by not more than 10,000 acres.	Ecological Section represented by 10,001 to 100,000 acres.	Ecological Section represented by more than 100,000 acres.
5. Number of	Wilderness acres of	Wilderness acres of	Wilderness acres of

Wilderness acres within 100 miles of Kalispell or Couer d'Alene.	approximately 100,000 acres.	approximately 500,000 acres.	approximately 1,000,000 acres.
6. Under-represented plant communities.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers more than 2/3 of the IRA.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers 1/3 to 2/3 of the IRA.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers less than 1/3 of the IRA.

Table IRA-6 shows the ratings and overall ratings for the IRAs.

Add the table.

DETERMINATION OF SUITABILITY AND PROPOSAL

Each individual IRA received a rating from the three tests of capability, availability, and need as described above. To be determined suitable for wilderness designation, the three ratings must indicate the IRA has an inherent wilderness quality. In addition to the three ratings, the area must provide opportunities and experiences that are dependent upon and enhanced by a wilderness environment. The size and shape of the area and the area boundaries must allow the area to be managed as wilderness. Suitability must also consider adjacent land, whether public or private, so that the entire national forest can be managed in accordance to public laws, including the protection and management of a variety of resources, both inside and outside the IRA.

The evaluation process described in FSH 1909.12, Chapter 72 is to determine the mix of land and resource uses that best meet public needs. This process may recommend management of an IRA through a theme different than proposed wilderness designation. Some management themes provide protection of existing wilderness characteristics while providing for resource management that is not compatible with a wilderness management theme. IRAs determined not to be suitable for wilderness designation will be evaluated for management under one of the other themes.

The three ratings of capability, availability, and needs provided the beginning determination of suitability. Other considerations such as size and shape, wilderness opportunities, and the ability to manage the area as wilderness were then applied. For areas determined to be suitable, proposed wilderness boundaries were mapped that supported wilderness management of the included land while providing protection of other resources and public safety.

An IRA's inherent wilderness quality could be demonstrated if the capability rating was high or moderate/high. Availability and need for wilderness designation could be demonstrated if at least one of these ratings was high and the other moderate or high. A rating of low for any of the three tests indicated the IRA did not meet the suitability determination. Applying the other considerations either confirmed or modified the beginning determination and completed the suitability determination for each IRA.

Determination of suitability included the Forest Supervisor, District Rangers, Forest Staff Officer, and Forest Wilderness Program Manager.

Parameters for mapping proposed wilderness for those IRAs determine to be suitable are, in order of priority:

1. Boundaries must be identifiable on the ground. Major ridges and roads provide the best topography or human development feature that can identify a boundary. Minor or broad ridges are often hard to identify on the ground and should not be used. Major creeks or rivers are suitable for boundaries but small creeks should not be used. Contour lines are difficult to locate even with the proper equipment

and generally will not be used except for short distances. Meandering lines are impossible to locate and may not be used.

Points and connecting straight lines using the Global Position System (GPS) may provide adequate boundary identification in the near future. Small handheld GPS units can locate boundaries to within a few feet. This system was allowed when other, better boundary locations did not exist.

2. Boundaries must allow for wildfire protection by providing a wildland fire interface zone near private property, along state and federal highways and county roads and along major utility corridors. The boundary was to be at least ½ mile from these features. Shorter distances were allowed in cases where management of private property was not conducive for human occupancy, such as high elevation corporation timber lands, where existing proclaimed wilderness boundary abuts against private land, or where remoteness of the area allowed for a shorter interface zone. These boundaries may not correlate to the Wildland Urban Interface (WUI) boundaries developed under the Healthy Forests Restoration Act of 2003. It is possible to have proposed wilderness boundaries inside a WUI boundary.
3. Boundaries must allow for maintenance of existing roads. The boundary was set 300 feet (horizontal distance) on either side of the road centerline to provide adequate area to maintain clearing limits, provide fuel breaks, handle slumps and slides, maintain water drainage structures, and allow for improvements necessary for safe travel. Along major arterial roads where traffic is normally heavy and the road provides the main access to the national forest, the distance was increased to ¼ mile.
4. Boundaries could allow motorized travel corridors through the proposed wilderness area. When two or more IRAs were separated by an open road, the IRAs could be proposed as a single wilderness but a 600 foot (300 foot either side of the road) motorized travel corridor could be maintained.
5. Old harvest units and the access roads could be included within the proposed wilderness boundary provided the evaluation process indicated wilderness management was the highest resource value for the treated lands, adequate mitigating measures had been taken to reduce erosion and other watershed issues on the access roads, and the inclusion of the treated lands eliminated intrusion corridors within the proposed wilderness.

Boundary mapping was completed in April 2005.

IRAs proposed for wilderness designation and the recommended boundaries are shown in the Forest Plan Revision documents and on the accompanying maps.

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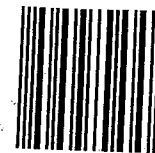
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