



July 4, 2025

TOM SCHULTZ, CHIEF

United States Forest Service

1400 Independence Avenue, SW

Washington, D.C. 20250-0003

Subject: Clarification and Prioritization of Trails for Maintenance within Frank Church River of No Return Wilderness

Introduction and Purpose

Dear Chief Schultz,

Thank you for your timely response dated June 5, 2025, and your willingness to collaborate in addressing the critical trail maintenance concerns within the Frank Church River of No Return Wilderness (FCRONRW).

In consideration of your request for detailed information to assist the Salmon-Challis National Forest in assessing specific maintenance needs and potential impacts, the Idaho Outfitters and Guides Association (IOGA) has reviewed the relevant appendices (H and J) of the FCRONRW Management Plan, conducted an extensive analysis informed by robust data, professional expertise, and closely consulted with outfitters and partners. This proposal has been developed with an understanding of and alignment with wilderness stewardship direction at both the Regional and National Forest Service levels, and we believe it reflects a balanced and practical interpretation of agency policy and precedent.

Methodology and Data Sources

The data utilized in our prioritization was derived from a methodology recommended by a wildfire expert from the Idaho Department of Lands, who suggested a 20-year assessment period (2004-2024) to accurately reflect persistent impacts from fire and insect damage, including subsequent deadfall and windfall. Specifically, we:

1. Applied a definition query to the Salmon-Challis National Forest's fire history layer, limiting the analysis to fire events since 2004, subsequently clipped to the Frank Church Wilderness boundary.
2. Clipped Forest Service Region 4 Insect & Disease Detection Survey data (R4 IDS Data Downloads - All Years) to the same wilderness boundary.
3. Merged these datasets to accurately reflect combined fire and insect impacts.
4. Clipped the SCNF non-motorized trail layer to the newly created combined impact layer and calculated trail mileage impacted and corresponding percentages.

This thorough approach ensures the prioritization presented here accurately represents ongoing maintenance challenges.

Selection Criteria and Trail Prioritization

Our updated prioritization identifies trails based on a defensible set of criteria integrating spatial data, trail classification, and partner input. Trails were included if they met one or more of the following conditions:

- **Classification as Mainline (Level 3), Secondary (Level 2), or Lower-priority (Level 1) trail types**, as defined in the FCRONRW Management Plan.
- **Significant combined impact from fire and/or insect or disease activity over a 20-year period (2004–2024)**, as verified by Forest Service and state GIS datasets. Specifically:
 - **Mainline (Level 3)** trails with at least **45%** of their mileage affected;
 - **Secondary (Level 2)** trails with **60% or more** affected;
 - **Lower-priority (Level 1)** trails included only in exceptional cases where damage exceeded **90%**.
- Where available, burn severity indicators (e.g., moderate or high severity) were used as additional context for trail condition and access limitations.
- Explicit prioritization by outfitters, reflecting direct knowledge of trail conditions, public use patterns, and readiness to support trail maintenance efforts in coordination with the Forest Service.

This refined prioritization—detailed comprehensively in the attached dataset and supporting documentation—highlights critical Mainline trails such as **Cayuse Creek, Soldier Basin, Square Top–West Horse, and Stoddard**, as well as essential Secondary trails like **White Creek, Mule Hill, and West Fork Thomas Creek**. Additionally, trails explicitly prioritized by outfitters—such as **Bernard Creek, Big Deer Creek, and Fish Lake**—are included to support meaningful collaboration and partnership opportunities.

It is important to emphasize that this proposal is strictly focused on routine trail maintenance, not new construction, reroutes, or development. All proposed work is intended to preserve and restore existing trail corridors consistent with wilderness character and long-standing public access patterns.

Additionally, while the enclosed dataset includes full trail mileage for each prioritized route, this should not be interpreted as a request to apply chainsaw use across all miles indiscriminately. Rather, full trails were included where overall conditions and historical data support a defensible threshold of impact—recognizing that affected segments shift over time due to delayed deadfall, windthrow, or reburn. Given these dynamic factors and the impracticality of managing by discrete mileposts, it is more effective and operationally sound to prioritize entire trail corridors where impacts are known or likely to occur. Actual saw use, if authorized, would be applied only where needed, consistent with on-the-ground assessments and standard wilderness protocols.

Rationale and Supporting Considerations

Our rationale for prioritization incorporates the following considerations:

- **Safety Concerns:** Ensuring trails remain clear and navigable is critical to reducing hazards associated with fallen trees and trail deterioration.
- **Access to Critical Areas:** These trails provide indispensable connectivity to outfitter campsites and recreational destinations essential to the local recreation economy.
- **Environmental Stewardship:** Timely, effective maintenance prevents further environmental degradation following wildfire and insect outbreaks, preserving wilderness character and sustainability.

These conditions converge to render traditional hand tools ineffective at scale, while also posing safety risks and long-term resource degradation. The resulting set of trails—including Cayuse Creek, White Creek, Mule Hill, and Soldier Basin—represent corridors where chainsaw use is not only warranted but necessary to maintain basic access and perform responsible stewardship.

This proposed scope is narrow, high-need, and fully supportable within the legal and policy frameworks guiding wilderness—*viz.* FCRONRW—management, including Minimum Requirements Decision Guides (MRDGs). We also recognize that the Minimum Requirements Analysis (MRA) associated with this request will be subject to approval by the Regional Forester, ensuring an additional level of oversight, accountability, and alignment with broader agency policy and wilderness guidance. To further minimize potential conflicts with other user groups and maintain harmony with traditional use patterns, we propose restricting chainsaw use to the early-season window prior to August 1st, thereby avoiding overlap with peak hunting season. This operational safeguard reinforces the limited, respectful, and situational nature of the proposed action. We welcome collaboration with the Salmon-Challis National Forest to implement this targeted approach efficiently and respectfully.

Policy Alignment and Statutory Framework

Furthermore, we underscore that the FCRONRW falls within the Central Idaho Complex, identified in 2018 by the Secretary of Agriculture as a priority area under the National Forest Service Trails Stewardship Act (16 USC 583k). These priority areas explicitly meet criteria including reduced public land access, increased risk to natural resources, jeopardized public safety, impassible trails, and heightened future deferred maintenance costs. This Congressional intent reinforces our proposal's foundation and underscores the appropriateness and urgency of our maintenance recommendations.

We remain deeply committed to wilderness stewardship principles and minimal-impact practices. Given the demonstrated inadequacies of traditional hand tools in addressing current trail conditions, we respectfully advocate for the strategic, controlled use of battery-operated chainsaws during designated periods—annually each June, for instance—aligning with both legislative intent and the Wilderness Act's overarching goals.

This proposal is specifically tailored to address the uniquely severe and persistent trail maintenance challenges within the Salmon-Challis managed portion of the Frank. Over years of collaboration with Salmon-Challis leadership and staff, our members have developed a nuanced understanding of the conditions and constraints shaping access and safety within this extensive wilderness. This targeted proposal emerges from and builds upon that shared understanding and represents a pragmatic, data-driven approach designed to support the Forest Service's stewardship responsibilities effectively, while minimizing unnecessary political exposure.

Implementation, Oversight, and Collaboration

We look forward to continued collaboration with your office and other stakeholders in refining this approach, ensuring that trail maintenance efforts support wilderness integrity, public safety, and sustainable recreational access. Thank you again for your attention to this critical matter. IOGA is committed to ongoing dialogue and partnership in these efforts.

Respectfully,



Aaron Lieberman
Outgoing Executive Director
Idaho Outfitters and Guides Association



Erik Weiseth
Incoming Executive Director
Idaho Outfitters and Guides Association

Enclosures:

1. Justification Narratives for Priority Trails
2. Dataset: Prioritized Trails with Fire and Insect Impact Criteria
3. Public Law 96-312 – Central Idaho Wilderness Act of 1980
4. House Report, Volume 3, 13361, 96th Congress, 2nd Session, 1980
5. Public Law 95-237 (HR 3454) – Endangered American Wilderness Act of 1978
6. House Report No. 95-540 (to accompany HR 3454)
7. The Wilderness Act Handbook – The Wilderness Society
8. Minimum Requirements Analysis: FAQs and Common Errors – Arthur Carhart Wilderness Training Center

Trail Prioritization Dataset

Methodology Summary

This dataset identifies priority trails within the Salmon-Challis portion of the FCRONR Wilderness based on GIS spatial analysis of 20-year fire and insect/disease impact layers (2004–2024), overlaid with Forest Service non-motorized trail data.

Trail segments were prioritized if:

- Type 3 (Mainline): $\geq 45\%$ of trail impacted
- Type 2 (Secondary): $\geq 60\%$ of trail impacted
- Type 1: $\geq 90\%$ of trail impacted, or designated as an outfitter priority

Additional factors considered:

- Severity of past fire impacts
- Collaborative input from outfitters and partners
- Role in providing essential public and outfitter access

Note: Total trail mileage listed reflects the full length of prioritized trails—not just impacted segments—due to operational and ecological variability that can shift damage and obstruction conditions across time.

Priority Trails Table

Trail Number	Trail Name	Maintenance Level	Total Trail Miles	Trail Mileage in Fire & Insect Damage	% of Trail in Fire or Insect Damage	Meets Criteria
4033	BEAVER-TRAIL CREEK	Level 1	7.93	6.25	79%	No
6061	BERNARD	Level 1	19.30	3.09	16%	No
4023	BERNARD CREEK	Level 1	4.30	3.93	91%	Yes
6029	BIG DEER CREEK	Level 1	13.90	6.27	45%	No
4015	BIG SOLDIER	Level 1	0.49	0.43	87%	No
4214	BLUE BUNCH MTN	Level 1	4.22	2.63	62%	No
4011	BLUE LAKE	Level 1	5.30	4.44	84%	No
4123	BRIDGE CREEK RIDGE	Level 1	10.40	0.37	4%	No
6164	BROOM TAIL	Level 1	4.94	4.89	99%	Yes
4113	CABIN-PIONEER CREEK	level 1	10.22	1.29	13%	No
4100	CACHE CREEK	Level 1	7.18	7.18	100%	Yes
4235	CAMAS MEADOW	Level 1	3.43	1.74	51%	No
4223	CANYON CREEK	Level 1	4.38	4.04	92%	Yes
4003	CASTLE FORK	Level 1	3.20	2.85	89%	No
4107	COLD SPRINGS CR	Level 1	4.50	2.72	60%	No
6173	CORRAL FLAT - SAGE BRUSH	Level 1	1.81	1.81	100%	Yes
4098	COVE CREEK	Level 1	1.40	1.35	96%	Yes
4099	COW CREEK	Level 1	7.66	7.63	100%	Yes
6236	CRAGS HORSE ALTERNATE	Level 1	2.04	0.48	24%	No
6011	DEAD HORSE	Level 1	3.50	0.74	21%	No
4111	DEER CREEK	Level 1	3.50	2.87	82%	No
4012	DUFFIELD CREEK	Level 1	7.60	6.02	79%	No
4009	EAST FORK THOMAS CREEK	Level 1	4.16	4.13	99%	Yes
4114	EAST MAYFIELD - YANKEE FORK	Level 1	14.44	5.69	39%	No
6025	ELKHORN	Level 1	2.91	2.50	86%	No
4020	FALL CREEK	Level 1	6.25	5.25	84%	No
6165	FILLY CREEK	Level 1	7.12	6.25	88%	No
4087	FISH LAKE	Level 1	2.00	1.61	80%	No
4124	FLY CREEK	Level 1	5.10	3.80	74%	No
4230	FORTY - FIVE CREEK	Level 1	5.29	0.74	14%	No
4216	FORTY- FOUR CREEK	Level 1	8.30	5.33	64%	No
4226	GARDEN WAY	Level 1	5.80	0.80	14%	No
4006	HARD SCRABBLE	Level 1	10.23	4.48	44%	No
6041.07	HOODOO CREEK	Level 1	6.52	3.19	49%	No

Trail Number	Trail Name	Maintenance Level	Total Trail Miles	Trail Mileage in Fire & Insect Damage	% of Trail in Fire or Insect Damage	Meets Criteria
6039	HOODOO TRAIL	Level 1	2.60	2.33	90%	Yes
4112	HORSE LADDER	Level 1	5.70	4.49	79%	No
4108	JACK CREEK	Level 1	6.20	2.45	40%	No
4126	LIBERTY CREEK RIDGE	Level 1	7.00	3.07	44%	No
4004	LITTLE LOON	Level 1	11.86	1.52	13%	No
4097	MACARTE RIDGE	Level 1	5.80	5.80	100%	Yes
4130	MELVILLE RIDGE	Level 1	2.10	2.06	98%	Yes
6012	MIRROR LAKE	Level 1	4.00	1.96	49%	No
4232	MOREHEAD MTN	Level 1	3.60	3.49	97%	Yes
4018	MUSKEG CREEK	Level 1	6.02	6.02	100%	Yes
4233	N FK SULPHUR CREEK	Level 1	5.39	3.00	56%	No
6171	NOLAN PT.	Level 1	4.30	2.04	48%	No
4029	NORTH FORK ELK CREEK	Level 1	7.68	1.17	15%	No
4129	POLE CREEK	Level 1	5.42	1.03	19%	No
4208	POTTERVINE	Level 1	1.60	1.58	99%	Yes
6209	RANCHERIO	Level 1	2.28	2.18	96%	Yes
6167	REYNOLDS CREEK	Level 1	6.31	4.99	79%	No
6203	ROAN RIDGE	Level 1	5.35	5.35	100%	Yes
4213	ROCK LAKE	Level 1	0.39	0.31	79%	No
4022	ROUGHNECK	Level 1	2.51	2.51	100%	Yes
6163	SKUNK CAMP	Level 1	7.45	6.15	83%	No
4017	SOLDIER CREEK	Level 1	7.31	7.30	100%	Yes
4016	SOLDIER RIDGE	Level 1	9.09	4.53	50%	No
4021	SOUTH FORK FALL CREEK	Level 1	8.07	7.90	98%	Yes
4215	SULPHUR CREEK CUTOFF	Level 1	3.06	2.74	90%	Yes
4119	TRAPPER CREEK	Level 1	7.50	6.97	93%	Yes
6038	UPPER YELLOWJACKET CR.	Level 1	11.10	7.31	66%	No
4231	W FK ELK CREEK	Level 1	9.97	1.29	13%	No
6161	WEST HORSE CUTOFF	Level 1	5.47	5.44	99%	Yes
4141	WHITE GOAT CREEK	Level 1	5.30	2.84	54%	No
4211	WHITE GOAT RIDGE	Level 1	6.20	5.15	83%	No
4131	WOODTICK RIDGE	Level 1	10.60	8.05	76%	No
6058	BEAR CREEK PT.	Level 2	17.43	3.62	21%	No
4010	BEAR VALLEY MARSH CREEK	Level 2	4.38	1.99	45%	No
4218	BIG BALDY LO	Level 2	0.91	0.50	55%	No
4227	BIG BALDY RIDGE	Level 2	18.48	5.90	32%	No
4102	CABIN CREEK	Level 2	8.50	2.20	26%	No
4134	CAMAS-EDDY CREEK	Level 2	15.18	4.52	30%	No
6204	CAMEL/KITCHEN CR.	Level 2	7.71	5.84	76%	Yes
4027	CAMPTENDER	Level 2	12.06	11.25	93%	Yes

Trail Number	Trail Name	Maintenance Level	Total Trail Miles	Trail Mileage in Fire & Insect Damage	% of Trail in Fire or Insect Damage	Meets Criteria
4116	COLD CREEK	Level 2	12.90	6.05	47%	No
6168	COTTONWOOD BUTTE	Level 2	25.86	13.69	53%	No
4117	COTTONWOOD CREEK	Level 2	6.39	3.28	51%	No
4002	COUGAR CREEK	Level 2	6.85	6.81	99%	Yes
4202	CRIMSON LAKE TRAIL	Level 2	2.50	1.52	61%	Yes
4019	CUTTHROAT	Level 2	2.89	2.89	100%	Yes
6053	DRY GULCH	Level 2	5.10	1.69	33%	No
4127	FLUME-S FK CAMAS	Level 2	9.09	4.05	45%	No
6028	GANT RIDGE	Level 2	10.61	4.13	39%	No
6172	GARDEN CREEK - HORSE HEAVEN	Level 2	14.04	8.89	63%	Yes
6070	GOLDEN TROUT LAKE	Level 2	0.60	0.22	37%	No
4085	GROUSE CREEK	Level 2	7.10	7.10	100%	Yes
6144	HARBOR LAKE	Level 2	1.70	0.03	2%	No
4031	HONEYMOON	Level 2	9.47	6.32	67%	Yes
6043	HOODOO MEADOWS	Level 2	19.23	6.90	36%	No
6159	HORSE CREEK	Level 2	14.58	13.59	93%	Yes
4225	INDIAN CREEK	Level 2	22.08	16.03	73%	Yes
4120	KERR CREEK	Level 2	1.90	0.88	46%	No
4036	KNAPP-LOON CREEK	Level 2	12.90	8.44	65%	Yes
4207	LAKE CREEK	Level 2	8.39	3.28	39%	No
4229	LITTLE PISTOL CREEK	Level 2	15.16	5.90	39%	No
4048	LITTLE SOLDIER LOOKOUT	Level 2	0.94	0.94	100%	Yes
4105	LOON CREEK POINT	Level 2	7.20	7.20	100%	Yes
4121	MAHONEY CREEK	Level 2	4.50	4.02	89%	Yes
4222	MARBLE CREEK	Level 2	14.11	8.09	57%	No
4103	MARTIN MOUNTAIN	Level 2	7.40	4.84	65%	Yes
4001.1	MIDDLE FORK EAST	Level 2	12.45	8.98	72%	Yes
4028	MOUNTAIN MEADOWS	Level 2	3.10	1.49	48%	No
4219	MULE HILL	Level 2	2.85	2.79	98%	Yes
4220	NORTON LAKE	Level 2	19.40	10.93	56%	No
4047	PORTER CREEK	Level 2	10.39	6.44	62%	Yes
6147	PUDDIN MOUNTAIN	Level 2	5.82	3.89	67%	Yes
4115	RAT CREEK	Level 2	11.27	9.22	82%	Yes
6024	REYNOLDS LAKE SPUR	Level 2	0.60	0.32	53%	No
4030	SHEEP CREEK	Level 2	2.97	1.30	44%	No
4005	SHEEP MTN RIDGE	Level 2	17.05	8.06	47%	No
6030	SHIP ISLAND	Level 2	3.57	1.03	29%	No
4040	SILVER MOON	Level 2	2.80	2.14	77%	
4212	SLEEPING DEER LO	Level 2	0.60	0.02	3%	No
4125	SOUTH FORK CAMAS	Level 2	9.30	3.17	34%	No

Trail Number	Trail Name	Maintenance Level	Total Trail Miles	Trail Mileage in Fire & Insect Damage	% of Trail in Fire or Insect Damage	Meets Criteria
6019	SOUTH FORK WATERFALL	Level 2	4.30	3.14	73%	Yes
6140	STODDARD LAKE	Level 2	6.81	3.30	48%	No
4128	W FK CAMAS CREEK	Level 2	11.35	2.66	23%	No
4104	WARM SPRINGS CREEK	Level 2	19.52	13.94	71%	Yes
4008	WEST FORK THOMAS CREEK	Level 2	5.53	4.65	84%	Yes
4221	WHITE CREEK	Level 2	5.61	5.43	97%	Yes
6198	WILSON CREEK	Level 2	3.19	0.73	23%	No
4132	WOODTICK CREEK	Level 2	6.87	5.60	81%	Yes
4133	WOODTICK CUTOFF	Level 2	2.39	0.74	31%	No
6021	BIGHORN CRAGS	level 3	29.74	14.87	50%	No
6166	CAYUSE CREEK	level 3	6.38	6.13	96%	Yes
6022	CLEAR CREEK	level 3	16.97	6.17	36%	No
4014	LANGER LAKE	level 3	7.55	5.83	77%	Yes
4101	LOON CREEK	level 3	20.35	10.17	50%	Yes
6162	LOWER SALMON RIVER	level 3	11.54	8.24	71%	Yes
4237	MARSH CREEK	level 3	4.38	2.57	59%	Yes
4001	MIDDLE FORK	level 3	71.84	42.04	59%	Yes
6044	MIDDLE FORK RIVER	level 3	31.61	6.91	22%	No
4228	PISTOL CREEK	level 3	17.94	4.53	25%	No
4007	RAPID RIVER	level 3	21.13	5.74	27%	No
4013	SOLDIER BASIN	level 3	13.67	12.37	90%	Yes
6158	SQUARE TOP-WEST HORSE	Level 3	33.36	28.22	85%	Yes
6169	STODDARD	level 3	25.40	11.72	46%	Yes
4046	SULPHUR CREEK	level 3	13.38	12.24	91%	Yes
4118	SUMMIT TRAIL	Level 3	17.08	6.43	38%	
6045	WATERFALL	level 3	16.10	10.84	67%	Yes
4224	BIG CHIEF	None	5.04	4.81	95%	Yes
4248	HOT CREEK RIDGE	None	5.20	4.69	90%	Yes
4014.1	LANGER LAKE SPUR 1		1.05	1.05	100%	Yes
4121.1	MAHONEY CREEK SPUR 1		0.88	0.75	85%	Yes
4008.1	WEST FORK THOMAS CREEK SPUR 1		0.08	0.08	100%	Yes

Narrative Justification for Included Trails

Each of the following trails meets defensible thresholds for chainsaw-enabled maintenance based on impact, classification, and/or severity.

Mainline Trails

- **BIGHORN CRAGS** – Mainline trail impacted by 50%, with 14.87 of 29.74 miles within insect or fire zones. Meets $\geq 45\%$ threshold for chainsaw-enabled maintenance and is vital for wilderness connectivity and safe access.
 - **CAYUSE CREEK** – 96% impacted, 6.13 of 6.38 miles. Critical corridor for access; meets proposed criteria for mechanical maintenance.
 - **LANGER LAKE** – 77% impacted, 5.83 of 7.55 miles. Priority trail for connectivity and outfitter-supported access.
 - **LOON CREEK** – 50% impacted, 10.17 of 20.35 miles. Essential mid-length route, supporting wilderness travel continuity.
 - **LOWER SALMON RIVER** – 71% impacted, 8.24 of 11.54 miles. Heavily used segment requiring sustained clearing efforts.
 - **MARSH CREEK** – 59% impacted, 2.57 of 4.38 miles. Compact but key segment in contiguous access strategy.
 - **MIDDLE FORK** – 59% impacted, 42.04 of 71.83 miles. Backbone of wilderness trail network; clearing efficiency is critical.
 - **SOLDIER BASIN** – 90% impacted, 12.37 of 13.67 miles. Severe damage warrants inclusion.
 - **SQUARE TOP–WEST HORSE** – 85% impacted, 28.22 of 33.36 miles. Critical for deep interior access and loop formation.
 - **STODDARD** – 46% impacted, 11.72 of 25.40 miles. Marginally above threshold, but essential for overall connectivity.
 - **SULPHUR CREEK** – 91% impacted, 12.24 of 13.38 miles. Severe impact; strategic location.
 - **WATERFALL** – 67% impacted, 10.84 of 16.10 miles. Facilitates mainline ingress for multiple user groups.
-

Secondary Trails

- **CAMEL/KITCHEN CR.** – 76% impacted, 5.84 of 7.71 miles. Strategic trail with high impact.
- **CAMPTENDER** – 93% impacted, 11.25 of 12.06 miles. Key mid-tier trail; meets inclusion threshold.
- **COUGAR CREEK** – 99% impacted, 6.81 of 6.85 miles. Severe impact; supports wilderness traffic.
- **CRIMSON LAKE TRAIL** – 61% impacted, 1.52 of 2.50 miles. Justified by impact extent despite short length.
- **CUTTHROAT** – 100% impacted, 2.89 of 2.89 miles. Total impact; warrants support.
- **GARDEN CREEK - HORSE HEAVEN** – 63% impacted, 8.89 of 14.04 miles. Maintains continuity in a remote section.
- **GROUSE CREEK** – 100% impacted, 7.10 of 7.10 miles. Fully obstructed, supports both recreation and outfitter access.
- **HONEYMOON** – 67% impacted, 6.32 of 9.47 miles. Serves dual recreation and logistical function.
- **HORSE CREEK** – 93% impacted, 13.59 of 14.58 miles. Major connector under threat of inaccessibility.
- **INDIAN CREEK** – 73% impacted, 16.03 of 22.08 miles. High priority based on extent and strategic location.
- **KNAPP-LOON CREEK** – 65% impacted, 8.44 of 12.90 miles. Exceeds impact threshold.
- **LITTLE SOLDIER LOOKOUT** – 100% impacted, 0.94 of 0.94 miles. Small but entirely impacted.
- **LOON CREEK POINT** – 100% impacted, 7.20 of 7.20 miles. Major impact justifies mechanical effort.

- **MAHONEY CREEK** – 89% impacted, 4.02 of 4.50 miles. Significant impact.
- **MARTIN MOUNTAIN** – 65% impacted, 4.84 of 7.40 miles. Steep and strategic.
- **MIDDLE FORK EAST** – 72% impacted, 8.98 of 12.45 miles. Central to loop connections and travel continuity.
- **MULE HILL** – 98% impacted, 2.79 of 2.85 miles. Nearly fully impacted.
- **PORTER CREEK** – 62% impacted, 6.44 of 10.39 miles. Moderate length with major impact.
- **PUDDIN MOUNTAIN** – 67% impacted, 3.89 of 5.82 miles. Important for elevation gain and route options.
- **RAT CREEK** – 82% impacted, 9.22 of 11.27 miles. Heavy impact, supporting chainsaw clearing.
- **SILVER MOON** – 77% impacted, 2.14 of 2.80 miles. Smaller but highly impacted.
- **SOUTH FORK WATERFALL** – 73% impacted, 3.14 of 4.30 miles. Functions as interior access spur.
- **WARM SPRINGS CREEK** – 71% impacted, 13.94 of 19.52 miles. Serves deep backcountry users.
- **WEST FORK THOMAS CREEK** – 84% impacted, 4.65 of 5.53 miles. Supports outfitted and self-guided trips.
- **WHITE CREEK** – 97% impacted, 5.43 of 5.61 miles. Highly impacted.
- **WOODTICK CREEK** – 81% impacted, 5.60 of 6.87 miles. One of the most critical affected access routes.

Spur/Connector (Way) Trails

- **BERNARD CREEK** – 91% impacted, 3.93 of 4.30 miles. Exceeds threshold; critical for remote access.
- **BROOM TAIL** – 99% impacted, 4.89 of 4.94 miles. Nearly full trail impact.
- **CACHE CREEK** – 100% impacted, 7.18 of 7.18 miles. Total loss; meets all criteria.
- **CANYON CREEK** – 92% impacted, 4.04 of 4.38 miles. Strategic corridor for interior linkages.
- **CORRAL FLAT - SAGE BRUSH** – 100% impacted, 1.81 of 1.81 miles. Full eligibility.
- **COVE CREEK** – 96% impacted, 1.35 of 1.40 miles. Compact but key trail segment.
- **COW CREEK** – 100% impacted, 7.63 of 7.66 miles. Critical drainage route under full impact thresholds.
- **EAST FORK THOMAS CREEK** – 99% impacted, 4.13 of 4.16 miles. Interior spur meets threshold.
- **HOODOO TRAIL** - 90% impacted.
- **MACARTE RIDGE** – 100% impacted, 5.80 of 5.80 miles. Total inclusion warranted.
- **MELVILLE RIDGE** – 98% impacted, 2.06 of 2.10 miles. Fully impacted.
- **MOREHEAD MTN** – 97% impacted, 3.49 of 3.60 miles. Ridges and transition zones at risk.
- **MUSKEG CREEK** – 100% impacted, 6.02 of 6.02 miles. Complete impact.
- **POTTERVINE** – 99% impacted, 1.58 of 1.60 miles. Spur likely needs intervention.
- **RANCHERIO** – 96% impacted, 2.18 of 2.28 miles. Small connector, fully eligible.
- **ROAN RIDGE** – 100% impacted, 5.35 of 5.35 miles. Fully within impact zones.
- **ROUGHNECK** – 100% impacted, 2.51 of 2.51 miles. Meets 90%+ standard.
- **SOLDIER CREEK** – 100% impacted, 7.30 of 7.31 miles. Strategic and completely impacted.
- **SOUTH FORK FALL CREEK** – 98% impacted, 7.90 of 8.07 miles. Critical to remote egress.
- **SULPHUR CREEK CUTOFF** - 90%
- **TRAPPER CREEK** – 93% impacted, 6.97 of 7.50 miles. Fieldwork required.
- **WEST HORSE CUTOFF** – 99% impacted, 5.44 of 5.47 miles. Nearly fully impacted; strategically placed.

Public Law 96-312
96th Congress

An Act

July 23, 1980
[S. 2009]

To designate certain public lands in central Idaho as the River of No Return Wilderness, to designate a segment of the Salmon River as a component of the National Wild and Scenic Rivers System, and for other purposes.

Central Idaho
Wilderness Act
of 1980

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Central Idaho Wilderness Act of 1980".

SEC. 2. (a) The Congress finds that—

(1) certain wildlands in central Idaho lying within the watershed of the Salmon River—the famous "River of No Return"—constitute the largest block of primitive and undeveloped land in the conterminous United States and are of immense national significance;

(2) these wildlands and a segment of the Salmon River should be incorporated within the National Wilderness Preservation System and the National Wild and Scenic Rivers System in order to provide statutory protection for the lands and waters and the wilderness-dependent wildlife and the resident and anadromous fish which thrive within this undisturbed ecosystem; and

(3) such protection can be provided without conflicting with established uses.

(b) The purposes of this Act are to—

(1) provide a comprehensive, statutory framework for the protection, administration, and management of the wildlands of the central Idaho region and a portion of the Salmon River through—

(A) the designation of the River of No Return Wilderness;

(B) the addition of certain lands in the "Magruder Corridor" to the existing Selway-Bitterroot Wilderness; and

(C) the incorporation of one hundred and twenty-five miles of the Salmon River as a component of the National Wild and Scenic Rivers System;

(2) end the controversy over which lands within the central Idaho region will be designated wilderness—thereby assuring that certain adjacent lands better suited for multiple uses other than wilderness will be managed by the Forest Service under existing laws and applicable land management plans; and

(3) make a comprehensive land allocation decision for the national forest roadless areas of the central Idaho region.

SEC. 3. In furtherance of the purposes of the Wilderness Act of 1964 (78 Stat. 890; 16 U.S.C. 1131), certain lands in the Boise, Challis, Payette, Salmon, Bitterroot, and Nezperce National Forests, Idaho, situated north and south of the Salmon River which comprise approximately two million two hundred and thirty-nine thousand acres, as generally depicted on a map entitled "River of No Return Wilderness, Proposed", dated June 1980, are hereby designated as wilderness and, therefore, as a component of the National Wilderness Preservation System, and shall be known as the River of No Return

River of No
Return
Wilderness, area
description and
designation
16 USC 1132
note

Wilderness. The previous classifications of the Idaho and Salmon River Breaks Primitive Areas are hereby abolished.

Sec. 4. In furtherance of the purposes of the Wilderness Act, certain lands in the Bitterroot National Forest, Idaho, which comprise approximately one hundred and five thousand six hundred acres as generally depicted on a map entitled "Magruder Corridor Proposed Additions, Selway-Bitterroot Wilderness", dated November 1979, are hereby incorporated in, and shall be deemed to be a part of, the Selway-Bitterroot Wilderness as designated by Public Law 88-577, and, therefore a component of the National Wilderness Preservation System.

Sec. 5. (a)(1) Within three years of the date of enactment of this Act, the Secretary of Agriculture (hereinafter referred to as "the Secretary") shall develop and submit to the Committee on Energy and Natural Resources of the United States Senate and the Committee on Interior and Insular Affairs of the House of Representatives a comprehensive wilderness management plan (hereinafter referred to as "the management plan") for the River of No Return Wilderness which shall consider a broad range of land uses and recreation opportunities.

(2) The management plan shall be prepared in coordination with the relevant national forest plans required by section 6 of the National Forest Management Act of 1976 (Public Law 94-588).

(3) The management plan shall include the cultural resources management plan required by section 8(a)(3) of this Act.

(4) In preparing the management plan, the Secretary shall provide for full public participation as required under section 6 of the National Forest Management Act.

(5) The management plan shall, among other things, address the need for, and alternative means of, access to the wilderness.

(b) In administering the River of No Return Wilderness, the Secretary shall, to the maximum extent practicable, consistent with the management plan required by this section, clear obstructions from all of the national forest trails within or adjacent to the wilderness on at least an annual basis.

(c) Subject to valid existing rights, the River of No Return Wilderness designated by this Act shall be administered by the Secretary in accordance with the provisions of the Wilderness Act: *Provided*, That any reference in such provisions to the effective date of the Wilderness Act shall be deemed to be a reference to the effective date of this Act.

(d)(1) Notwithstanding the provisions of the Wilderness Act of 1964 (78 Stat. 890; 16 U.S.C. 1131), including section 4(d)(3), closing wilderness areas after December 31, 1983, to the United States mining laws, and the designation of the River of No Return Wilderness by this Act, within that portion of the wilderness depicted on a map entitled "Special Mining Management Zone—Clear Creek", (hereinafter referred to in this section as the "Special Management Zone"), dated June 1980, all prospecting and exploration for, and development or mining of cobalt and associated minerals shall be considered a dominant use of such land and shall be subject to such laws and regulations as are generally applicable to National Forest System lands not designated as wilderness or other special management areas, including such laws and regulations which relate to the right of access to valid mining claims and private property: *Provided*, That:

(A) all mining locations and associated access roads shall be held and used solely for mining or mineral processing operations and uses reasonably incident thereto, except that the Secretary

Abolishments

Selway-Bitterroot Wilderness, incorporated lands

16 USC 1131

Comprehensive management plan, submittal to congressional committees.

16 USC 1604

16 USC 1608

16 USC 1601.

Effective date.

16 USC 1131 note

Special Management Zone, mining
16 USC 1133

LIBRARY OF CONGRESS



0 010 832 334 6

13361

HOUSE
REPORTS
Vol. 3

Nos. 834-837
MISCELLANEOUS
REPORTS

NO. 1
LIBRARY
OF
CONGRESS

96th CONGRESS
2d SESSION
1980

LL

KF 12
.U5
serial
13361
1980
Set 1

National Environmental Policy Act of 1969. Although the District Court's decision holding the final RARE II EIS to be legally insufficient to justify the non-wilderness allocations on 47 specific tracts is limited to the National Forests in California, some have alleged that it places in jeopardy development on "non-wilderness" recommended tracts nationwide. The Committee does not share this view. Not only is the decision limited to the 47 California areas, but the Committee observes that some 100 timber sales occurred in RARE II recommended "non-wilderness" areas in fiscal year 1979, and that some 2 billion board feet of sales, or almost 20 percent of the total National Forest System programmed harvest for fiscal year 1980, are scheduled for such "non-wilderness" recommended tracts in FY 1980. Numerous other development activities including road construction, mining activities, mineral leasing and the like have also proceeded in "non-wilderness" recommended areas. Other than activities scheduled in the 47 California areas, the Committee is unaware of any impediments to the completion of such timber sales or other development activities.

Nevertheless, to allay the fears of those who feel the California decision might be construed to apply to the Central Idaho "non-wilderness" recommendations addressed in Senate Report 96-414 and this report, this Committee makes the following observations:

1. The RARE II final environmental statement has served to provide Congress with adequate information to assist Congress in making its determination as to which lands it will designate as wilderness in the Central Idaho region. The RARE II data, the analytical approach and the assessment of public opinion with respect to these lands did not cover every point on which the Committee desired information, but the Committee augmented the Forest Service study by its own reviews and hearings. Further study of the wilderness values of "non-wilderness" lands mentioned in the Senate Committee Report and this report is, in the Committee's opinion, not needed insofar as it involves the roadless area review embodied in the current generation of land management plans being developed under the provisions of the Forest and Rangeland Renewable Resources Planning Act (as amended).

2. Congress (through numerous public hearings, field inspection trips, and otherwise) has carefully examined the wilderness qualities of the lands designated as wilderness by this Act and also the lands discussed in both the Senate report and this report for management as other than wilderness. Therefore allegations of inadequate wilderness review cannot constitute a valid ground for administrative or judicial appeal of "first-generation" NFMA plans and Forest Service decisions to proceed with development plans in the specific areas listed in the reports accompanying S. 2009.

3. Any arguments that the RARE II final environmental statement does not satisfy the requirements of the National Environmental Policy Act for the area in Central Idaho addressed by the S. 2009 decision are thus moot. In short, Congress has acted on wilderness in central Idaho, and any further wilderness studies by the Forest Service of the lands in question would be wasteful and pointless in the context of the current generation of land

management plans being promulgated pursuant to section 6 of the Forest and Rangeland Renewable Resources Planning Act (as amended). The Committee does observe, however, that the law and sound multiple use philosophy will require a further review of such wilderness values as may remain in the lands concerned when "second generation" land management plans are formulated some 10-15 years hence.

SECTION-BY-SECTION ANALYSIS

Section 1: Designates the short title.

Section 2: Designates a River of No Return Wilderness of 2,234,000 acres and abolishes the existing classification of Idaho and Salmon River Breaks Primitive Areas.

Section 3: Adds 105,600 acres to the existing Selway Bitterroot Wilderness.

Section 4(a): Mandates the preparation of a management plan for the River of No Return Wilderness with public participation. The management plan is to include, among other things, a cultural resources management plan, a discussion of the need for alternative access to the wilderness, and a report on the strategic significance of materials and minerals in the area.

Subsection 4(b): Directs the clearing of obstructions from all national forest trails within and adjacent to the wilderness on at least an annual basis.¹

Subsection 4(c): Contains the standard language of all wilderness bills pertaining to the management of wilderness areas designated by the bill.

Section 5: Contains the standard language of all wilderness bills pertaining to the filing of maps and legal descriptions for the wilderness areas designated by the bill.

Section 6: Repeats the provisions of section 4 of the Wilderness Act pertaining to the effect of wilderness on aircraft use, livestock grazing, commercial services, state water laws, and wildlife and fish jurisdiction. In addition, subsection (a)(1) prohibits the closure of aircraft landing strips within the wilderness areas designated by the bill except in the case of extreme danger to aircraft, and then, only with the written concurrence of the agency of the State of Idaho charged with evaluating the safety of backcountry airstrips. Subsection (6)(a)(2) further stipulates that existing grazing within the wilderness areas shall be permitted to continue in accordance with regulations as the Secretary of Agriculture deems necessary and which are consistent with the intent of Congress regarding grazing in such areas. (Detailed guidelines pertaining to Congress' intent vis-a-vis grazing can be found under the "Grazing in National Forest Wilderness" heading earlier in this report.)

Section 7(a): Requires the Secretary of Agriculture to cooperate

¹The Committee recognizes that this is a relatively large task, and observes that the Secretary can contract with outfitters and other third parties to perform such work. Where necessary, the Committee has no objection to the use of chain saws or other mechanized equipment to perform such tasks, as long as such uses occur in seasons and areas where the use of such equipment will not adversely affect wildlife utilization, disrupt natural succession, or create unnecessary conflicts with primitive recreational use.

Public Law 95-237
95th Congress

An Act

Feb. 24, 1978
[H.R. 3454]

To designate certain endangered public lands for preservation as wilderness, and for other purposes.

Endangered
American
Wilderness Act of
1978.
16 USC 1132
note.
16 USC 1132
note.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Endangered American Wilderness Act of 1978".

STATEMENT OF FINDINGS AND POLICY

SECTION 1. (a) The Congress finds that—

(1) many areas of undeveloped national forest land possess and exhibit outstanding natural characteristics giving them high value as wilderness and will, if properly preserved, contribute as an enduring resource of wilderness for the benefit of the American people;

(2) certain of these undeveloped national forest lands meet all statutory criteria for suitability as wilderness as established by subsection 2(c) of the Wilderness Act (78 Stat. 890), but are not adequately protected and lack statutory designation pursuant to the Wilderness Act as units of the National Wilderness Preservation System;

(3) these and other undeveloped national forest lands exhibiting wilderness values are immediately threatened by pressures of a growing and more mobile population, large-scale industrial and economic growth, and development and uses inconsistent with the protection, maintenance, restoration, and enhancement of their wilderness character; and

(4) among such immediately threatened areas are lands not being adequately protected or fully studied for wilderness suitability by the agency responsible for their administration.

(b) Therefore, the Congress finds and declares that it is in the national interest that certain of these endangered areas be promptly designated as wilderness within the National Wilderness Preservation System, in order to preserve such areas as an enduring resource of wilderness which shall be managed to promote and perpetuate the wilderness character of the land and its specific multiple values for watershed preservation, wildlife habitat protection, scenic and historic preservation, scientific research and educational use, primitive recreation, solitude, physical and mental challenge, and inspiration for the benefit of all of the American people of present and future generations.

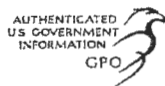
DESIGNATION OF WILDERNESS AREAS

16 USC 1132
note.
16 USC 1131
note.

SEC. 2. In furtherance of the purposes of the Wilderness Act, the following lands (hereinafter referred to as "wilderness areas"), as generally depicted on maps appropriately referenced, dated January 1978, are hereby designated as wilderness and, therefore, as components of the National Wilderness Preservation System—

Pusch Ridge
Wilderness, Ariz.

(a) certain lands in the Coronado National Forest, Arizona, which comprise about fifty-six thousand four hundred and thirty



Appropriation
authorization.

(h) There are hereby authorized to be appropriated after October 1, 1978, such funds as may be necessary to carry out the comprehensive fish and game research program and the multipurpose resource development plan authorized under this section. Appropriations requests by the President to implement the multipurpose resource development plan shall express in qualitative and quantitative terms the most rapid and judicious manner and methods to achieve the purposes of this Act. Amounts appropriated to carry out this Act shall be expended in accordance with the Budget Reform and Impoundment Control Act of 1974 (88 Stat. 297).

31 USC 1301
note.

ADMINISTRATION OF WILDERNESS AREAS

16 USC 1131
note.
Effective date.

SEC. 5. Subject to valid existing rights, each wilderness area designated by this Act shall be administered by the Secretary in accordance with the provisions of the Wilderness Act: *Provided*, That any reference in such provisions to the effective date of the Wilderness Act shall be deemed to be a reference to the effective date of this Act: *Provided further*, That with respect to the Gospel-Hump Wilderness Area designated by section 4(a)(1) of this Act, all references under section 4(d)(3) of the Wilderness Act of 1964 to December 31, 1983, shall be deemed to be December 31, 1988, and any reference to January 1, 1984, shall be deemed to be January 1, 1989: *Provided, however*, That all activities resulting from the exercise of valid existing mineral rights on patented or unpatented mining claims within the Gospel-Hump Wilderness Area shall be subject to regulations prescribed by the Secretary as he deems necessary or desirable for the preservation and management of this area.

16 USC 1133.

FILING OF MAPS AND DESCRIPTIONS

SEC. 6. As soon as practicable after enactment of this Act, a map and a legal description of each wilderness area shall be filed with the Committee on Energy and Natural Resources of the United States Senate and the Committee on Interior and Insular Affairs of the House of Representatives, and each such map and description shall have the same force and effect as if included in this Act: *Provided*, That correction of clerical and typographical errors in each such legal description and map may be made. Each such map and legal description shall be on file and available for public inspection in the Office of the Chief of the Forest Service, Department of Agriculture.

Approved February 24, 1978.

LEGISLATIVE HISTORY:

HOUSE REPORTS: No. 95-540 (Comm. on Interior and Insular Affairs) and No. 95-861 (Comm. of Conference).

SENATE REPORTS: No. 95-490 (Comm. on Energy and Natural Resources), and No. 95-626 (Comm. of Conference).

CONGRESSIONAL RECORD:

Vol. 123 (1977): Sept. 12, considered and passed House.
Oct. 20, considered and passed Senate, amended.
Vol. 124 (1978): Feb. 8, Senate agreed to conference report.
Feb. 9, House agreed to conference report.

WEEKLY COMPILATION OF PRESIDENTIAL DOCUMENTS:

Vol. 14, No. 8 (1978): Feb. 24, Presidential statement.

DESIGNATING CERTAIN ENDANGERED PUBLIC LANDS FOR PRESER-
VATION AS WILDERNESS, PROVIDING FOR THE STUDY OF ADDI-
TIONAL ENDANGERED PUBLIC LANDS FOR SUCH DESIGNATION,
FURTHERING THE PURPOSES OF THE WILDERNESS ACT OF 1964,
AND FOR OTHER PURPOSES

JULY 27, 1977.—Committed to the Committee of the Whole House on the State
of the Union and ordered to be printed

Mr. UDALL, from the Committee on Interior and Insular Affairs,
submitted the following

REPORT

together with

SUPPLEMENTAL AND MINORITY VIEWS

[To accompany H.R. 3454]

The Committee on Interior and Insular Affairs, to whom was re-
ferred the bill (H.R. 3454) to designate certain endangered public
lands for preservation as wilderness, to provide for the study of addi-
tional endangered public lands for such designation, to further the
purposes of the Wilderness Act of 1964, and for other purposes, having
considered the same, report favorably thereon with an amendment
and recommend that the bill as amended do pass.

The amendment is as follows:

Page 1, beginning on line 3, strike out all after the enacting clause
and insert in lieu thereof the following:

That this Act may be cited as the "Endangered American Wilderness Act of
1977".

STATEMENT OF FINDINGS AND POLICY

SECTION 1. (a) The Congress finds that—

(1) many areas of undeveloped public lands possess and exhibit outstand-
ing natural characteristics giving them high value as wilderness and will,
if properly preserved, contribute as an enduring resource of wilderness for
the benefit of the American people;

(2) certain of these undeveloped public lands meet all statutory criteria
for suitability as wilderness as established by subsection 2(c) of the Wild-
erness Act (78 Stat. 890), but are not adequately protected and lack statu-
tory designation pursuant to the Wilderness Act as units of the National
Wilderness Preservation System;

THE WILDERNESS ACT H A N D B O O K

40th Anniversary Edition



THE
WILDERNESS
SOCIETY

Numerous other aspects of the so-called "purity" issue have been debated over the past several years, and especially during the hearings on H.R. 3454. In some instances, the strictest interpretation of the Wilderness Act has led to stringent "purity" criteria, which have prejudiced the potential recommendation of an area for further wilderness consideration. In others, it has led to public opposition to wilderness proposals based on what is, and what is not, perceived to be—sometimes erroneously—permissible in wilderness areas under the provisions of the 1964 Wilderness Act.

After more than a decade of experience, the committee recognizes the problems which differing interpretations of the Wilderness Act create. The committee was pleased to receive the new Administration's less stringent interpretation of the Wilderness Act and agrees that this new direction is in order. To further clarify matters, the committee considers it appropriate to comment in some detail on some of the issues which current policies attempt to resolve and to offer its guidance as to how the Wilderness Act should now be interpreted as it relates to certain uses and activities:

Hunting and Fishing.—Hunting and fishing are among the prime uses of many wilderness areas, and are permitted in all cases subject to applicable State and Federal laws and regulations (Wilderness Act, section 4(d)(8)), and such other reasonable restrictions as may be necessary under principles of sound land management. The committee concurs in Assistant Secretary of Agriculture Rupert Cutler's observation that suggestions that hunting and fishing will be phased out in the National Wilderness Preservation System over the next 20 years are "absurd". They will actually be improved.

Trails, Bridges, Trail Signs.—Trails, trail signs, and necessary bridges are all permissible when designed in keeping with the wilderness concept. These are often important to the recreational access and use of a wilderness area. Trail construction or maintenance can include the use of mechanical equipment where appropriate and/or necessary.

Fire, Insects, Disease.—Section 4(d)(1) of the Wilderness Act permits any measures necessary to control fire, insect outbreaks or disease in wilderness areas. This includes the use of mechanized equipment, the building of fire roads, fire towers, fire breaks or fire pre-suppression facilities where necessary, and other techniques for fire control. In short, anything necessary for the protection of the public health or safety is clearly permissible.

Cabins.—Cabins exist in several designated wilderness areas and are entirely appropriate where they are necessary for the proper administration of the area, for the protection of the public, or as a management tool for the protection of the wilderness area.

Sanitary Facilities.—Sanitary facilities (such as pit toilets) are permissible in wilderness areas, and in many cases, may be vital to the protection of water quality and the health of the public. Servicing of sanitary facilities may be accomplished by mechanical means (such as helicopters) where practical alternative means of servicing do not exist.

Mechanized Equipment.—In general, the use of motorboats, airplanes, trail bikes, 4-wheel drive vehicles, snowmobiles and the like is prohibited in wilderness areas. However, subject to such restrictions as

ENDANGERED AMERICAN WILDERNESS ACT
(P.L. 95-237; 1978)

House Report 95-540: "Trails, Bridges, Trail Signs—Trails, trail signs, and necessary bridges are all permissible when designed in keeping with the wilderness concept.

These are often important to the recreational access and use of a wilderness area. Trail construction or maintenance can include the use of mechanical equipment where appropriate and/or necessary. Shelters, Campsite Facilities--Trailside shelters or lean-tos should not be provided in wilderness areas except where necessary under Section 4(b) or (c) of the Wilderness Act for the protection of the wilderness, or for the health and safety of the user. In general, fire rings, hitching posts, non-permanent tent platforms or pads, and other temporary structures used by outfitters may be allowed at the discretion of the Secretary, and the Committee feels that these should not have to be removed each winter if they can be stored in an unobtrusive fashion."

Climbing in Wilderness

Climbing has a long history in designated wilderness and is considered to be a legitimate activity in wilderness. Yet, certain aspects of climbing have generated controversy—particularly the use of permanent, fixed anchors. There are both temporary and permanent fixed anchors. Temporary anchors are readily removable and include nylon slings, or metal nuts and chocks that are wedged into cracks in the rock. Others, such as small bolts that are attached to rock faces by drilling a small hole in the rock and inserting a bolt to which a rope is attached are more permanent in character.

The Wilderness Act is silent on climbing and on the issue of fixed anchors, although they were in use at the time, primarily in the form of pitons. The use of fixed anchors in wilderness areas became an issue in 1998 after a Forest Service ban on the use of permanent and temporary anchors in Idaho's Sawtooth Wilderness was extended to all wilderness areas. This nationwide ban subsequently was lifted, pending the outcome of a rule-making committee. However, the committee was unable to come to a unanimous agreement. As of April 2004, fixed anchors are allowed in designated wilderness. Some areas, where the use of permanent anchors is pervasive, are addressing the

motorized equipment or mechanical transport requires advance approval by the administering agency.”

ENDANGERED AMERICAN WILDERNESS ACT (P.L. 95-237; 1978)

House Report 95-540: “Fisheries Enhancement—Fisheries enhancement activities and facilities are permissible and often highly desirable in wilderness areas to aid in achieving the goal of ‘preserving the wilderness character of the area’ as stated in Section 4(b) of the Wilderness Act. Such activities and facilities include fish traps, stream barriers, aerial stocking, and the protection and propagation of rare species.”

Recreation Use

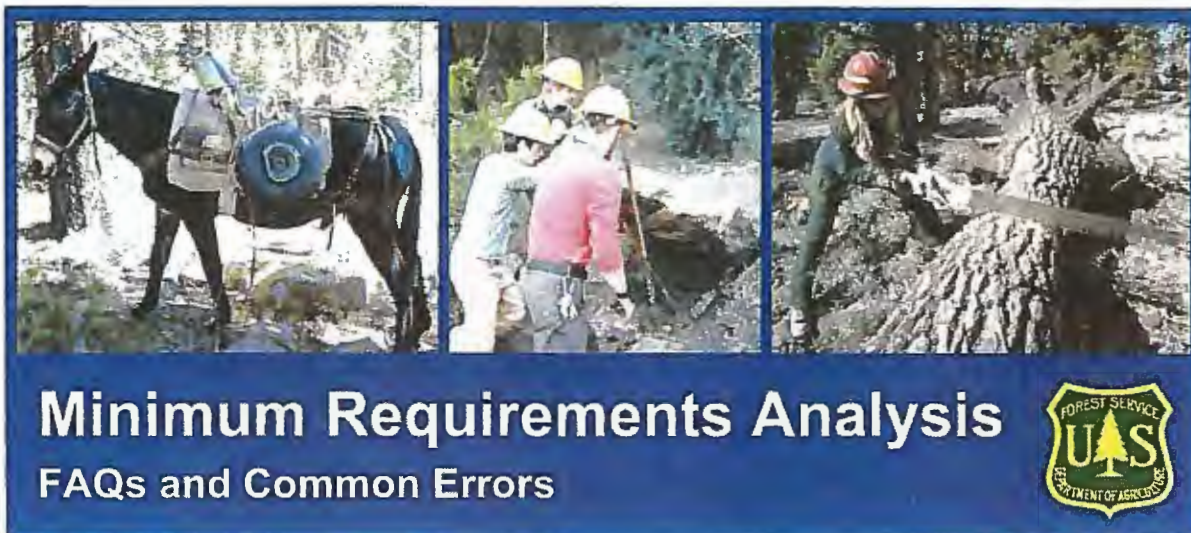
The Wilderness Act clearly recognizes recreation as an important value of wilderness. Arguably, the drafters of the Wilderness Act considered “solitude” and a “primitive and unconfined type of recreation” to be premier wilderness values.

Recreation within a wilderness area depends significantly on the mandate of the relevant land management agency. For example, hunting is allowed to continue when an area is designated as wilderness—except in national park wilderness, because hunting is generally not permitted in parks.

Nonetheless, while recreation is a recognized use of wilderness, it is not the only one--nor the most important. Some thought should be given to leaving large portions of a wilderness area free of trails.

Visitor use can be dispersed by constructing new trails where trails are already located or, more often, simply through better maintenance of the existing trail network. Inadequate trail maintenance is an increasing problem in wilderness areas, resulting in its own negative environmental and social impacts.

Facilities such as trail shelters are regarded as relatively permanent structures and generally are not permitted in wilderness. Most land management agency policies prohibit the construction of new shelters and call for prompt removal of existing shelters after an area is designated as wilderness. Those policies were criticized, especially



Preface

The intent of this document is to clarify and address questions often submitted by Forest Service personnel and common errors associated with completing a Minimum Requirements Analysis (MRA) for wilderness projects. Employees of other agencies may find it useful as well, but agency policies may differ and additional research may be required. The following online trainings are considered prerequisites to completing an MRA and should be completed before referencing this document:

- *The Wilderness Act*
- *Writing a Minimum Requirements Analysis*

These are found here: <http://www.wilderness.net/NWPS/elearning>.

This document is designed to supplement the instructions for the Minimum Requirements Decision Guide (MRDG). You are advised to review the instructions prior to searching this document for answers to your questions.

The MRDG Instructions are found here:

http://www.wilderness.net/MRDG/documents/MRDG_instructions.pdf.

More MRA resources can be found here: <http://www.wilderness.net/MRA>, including recorded webinars, case study examples, an evaluation guide, and agency guidelines. Current training opportunities provided by the Arthur Carhart National Wilderness Training Center can be found here: <http://www.wilderness.net/NWPS/training>.



The Basics

When do I have to complete an MRA?

An MRA is required by law when uses prohibited under Section 4(c) of the Wilderness Act are being considered for a project in wilderness:

“Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet **minimum requirements** for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be:

- no temporary road,
- no use of motor vehicles, motorized equipment or motorboats,
- no landing of aircraft,
- no other form of mechanical transport, and
- no structure or installation

within any such area.”

Though not required by law, it is also recommended that an MRA be conducted whenever an administrative action may adversely affect wilderness character whether a prohibited use is considered or not. In addition, the use of chemicals requires Regional Forester approval (FSM 2323.34f), and is facilitated using an MRA.

The MRDG provides a thorough and methodical process to assist managers/decision makers in conducting an MRA and is the preferred tool for analysis documentation in the Forest Service.

Do I have to conduct MRAs for emergencies?

First, what is an emergency? According to a court decision (*Olympic Park Assoc. v. Mainella, 2005*), emergencies are:

“...matters of urgent necessity rather than... conveniences for future use ...”

FSM 2326.1(1) specifies an emergency as “inescapable urgency and temporary need for speed beyond that available by primitive means.” This basically permits an appropriate response to an emergency. For example, it allows a helicopter evacuation of a critically

