MINIMUM REQUIREMENTS ANALYSIS FRAMEWORK WORKBOOK

"…except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act…"

— Section 4(c), Wilderness Act of 1964

Introduction

The Minimum Requirements Analysis (MRA) is designed to examine whether a project truly needs to occur in wilderness, and if so, how to accomplish it with the least impact to the wilderness resource. The framework below is intended to help managers: 1) evaluate actions proposed in wilderness involving a use otherwise prohibited by the Wilderness Act; and 2) consider appropriate choices about administrative actions they might take. Like the previous version of this document (the Minimum Requirements Decision Guide (MRDG)), the MRA Framework (MRAF) is based on the Wilderness Act and is consistent with agency policy. The MRAF incorporates lessons learned by agency employees as they used the MRDG over the years. The goal of the MRAF is to help provide consistency in the way wilderness-managing agencies consider actions to address threats to wilderness, and to ensure that agencies strive to preserve wilderness character through their on-the-ground decisions.

This document is intended for uses prohibited by Section 4(c) of the Wilderness Act in designated wilderness, but it can be used to analyze all projects in wilderness. Check agency policy to determine if this workbook may be appropriate for other proposals in wilderness.

If applicable, per agency policies, collaborate and coordinate with associated Tribe(s) and/or Tribe(s) with historical, treaty, or related ties to the area.

Salmon-Challis National Forest Frank Church River of No Return Wilderness Area Trail Maintenance

Step 1: Determine If Administrative Action May Be Necessary

Issue Statement

The Frank Church River of No Return Wilderness (Frank), located in central Idaho, is the largest contiguous wilderness in the lower 48 states and in the National Forest System. It is 2,365,896 acres and located on the Boise, Bitterroot, Nez Perce, Payette, and Salmon-Challis National Forests. The Salmon-Challis National Forest (SCNF) manages approximately 1,270,575 (936,540 acres on the SCNF and 334,034 for the Boise National Forest) of the total acres in the Frank. The Frank has 2,405 miles of total hiking/stock trails and the SCNF is responsible for maintaining about 1,225 miles.

The primary issue with the trail system is the vast number of deadfall trees blocking trail access and reducing recreation opportunities. Trees are falling because they have been weakened by wildfire events, insect and disease infestations, and are susceptible to wind events. As a result, a substantial portion of trails are blocked from deadfall trees and they continue to fall at a rate that agency staff, partners, and volunteers cannot keep pace with removing.

Idaho Outfitter Guide Association, in addition to others, sent a letter to the Chief of the Forest Service expressing concern that a significant portion of the trail system in the Frank is inaccessible due to deadfall and diminishing recreation opportunities. They propose using chainsaws to clear deadfall as a solution and are requesting consideration of their proposal.

Background

Public and legislative recognition and concern over deadfall blocking trails in the Frank has existed for many years. In 2013, the Idaho Legislature passed a nonbinding resolution calling for a disaster declaration for the Frank due to loss of access from accelerated deadfall after wildfire, insect and disease, and other weather events. The 2016 National Forest System Trails Stewardship Act (Public Law 114-245, Nov.28, 2016) directed the Secretary of Agriculture to select “priority areas” for increased trail maintenance where a lack of trail maintenance has reduced access. The Central Idaho Complex Priority Area was selected, and the Frank makes up a substantial portion of this area. The public, outfitter guides, and agency employees have also recognized and voiced concern over lack of access due to the quantity of deadfall in the Frank and the scale of the issue.

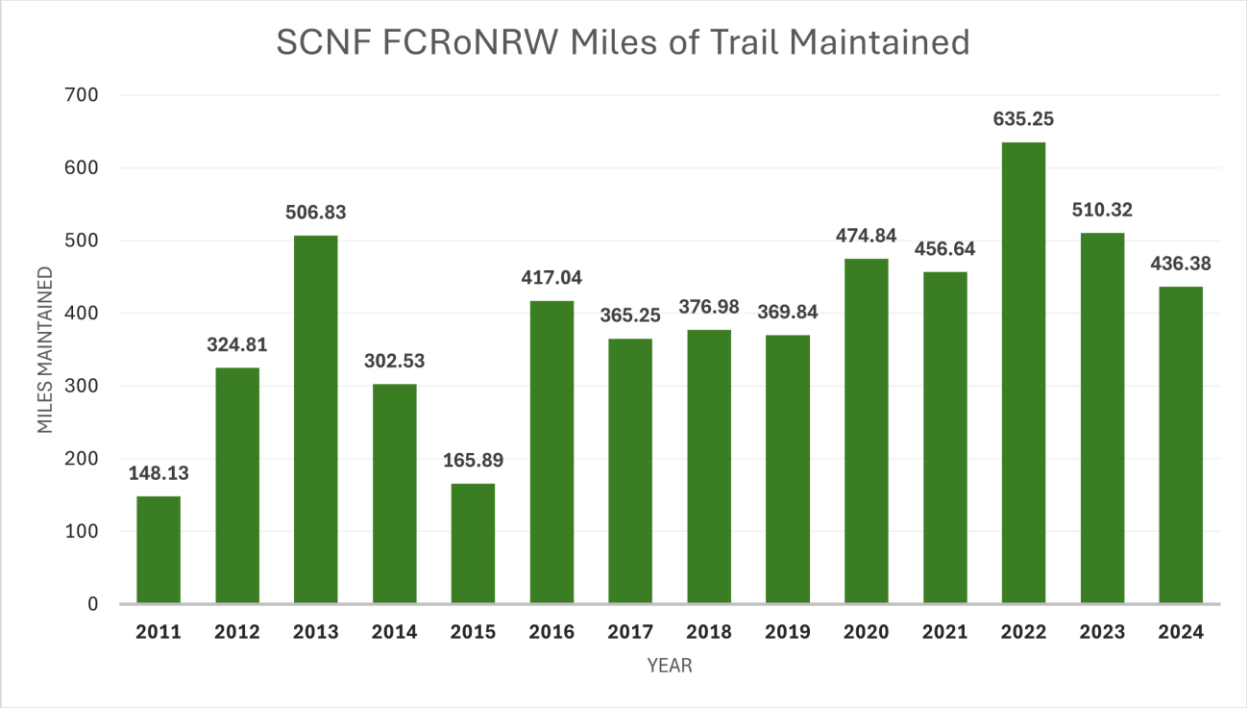
The Central Idaho Wilderness Act (Public Law 96-312, July 23, 1980), that established the Frank, in Section 5(a) (1)(5)(b) states,

> "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 system trails within or adjacent to the wilderness on at least an annual basis."[1]

In 2016, trail maintenance in the Frank was prioritized to take advantage of increased funding and capacity through volunteer and partner groups. The National Forest System Trails Stewardship Act increased the role of volunteers and partners in trail maintenance. One part of the Act allowed National Forests to offset outfitters' land use fees by completing trail maintenance. Annually, between 9 and 12 outfitters who operate in the Frank participate in this program. In addition, in 2020 trail maintenance funding through the Great American Outdoors Act was applied to trail maintenance in the Frank.

[1] The Frank Church Management Plan (Frank Plan) classifies trails as level 3-Mainline, level 2-Secondary, or level 1-Lower Priority. Level 3-Mainline trails receive the highest level of maintenance, including logging out annually. Level 2-Secondary trails receive maintenance every 1-3 years and level 1-Lower Priority trails receive the least amount of maintenance, every 1-5 years.

Figure 1



Despite these efforts, the amount of trail maintenance in the Frank only increased slightly (see Figure 1). Crews are having to re-cut the same trails year after year which leaves little or no opportunity to address additional trails in the Frank. Trees killed or weakened by fire, insects, and disease are continuing to fall and block trails at an increasing rate that employees, partners, and volunteers cannot keep up with.

Idaho Outfitter Guide Letter and Proposal

On May 12, 2025, Idaho Outfitter and Guides Association (IOGA) sent a letter to the Chief of the Forest Service proposing using chainsaws for clearing trails during a designated period in the Frank to address the deadfall issue. On June 5, 2025, the Chief responded by asking IOGA to work with the SCNF and provide more detailed information, including priority trails for chainsaw use and reasons they are a priority. On July 4, 2025, IOGA responded to the Chief with additional information and requested consideration of their proposal.

IOGA's proposal (Appendix A) is limited to the SCNF. It identifies trails that are likely to have significant deadfall by overlaying the trail systems with fire history on the SCNF from 2004 through 2024 and Region 4 Insect and Disease Detection Survey Data (1997-2024). It identifies trails when the impact from fire and/or insect or disease affects a certain percentage of a particular trail. Specifically:

- Level 3-Mainline with at least 45% of their mileage affected.
- Level 2-Secondary with 60% or more of their mileage affected.
- Level 1-Lower Priority trails were only included where damage exceeded 90%.

In addition, burn severity (e.g., moderate or high severity) was used, when available, for additional context. IOGA also referenced outfitter knowledge of trail conditions and public use patterns.

In total, IOGA's proposal identifies 542 miles on 61 trails they feel are likely to have significant deadfall.[2] These trails represent about 44% of the total 1,225 miles of trail in SCNF managed portion of the Frank.

2025 SCNF Trail Reconnaissance

On October 30th and 31st, the SCNF completed helicopter flights on a portion of the trails identified by IOGA. The SCNF flew approximately 150 miles of trail out of the 542 miles identified by IOGA to estimate deadfall levels and assess impacts from wildfire, insect, disease, and wind events.

Nearly all trails flown had significant levels of deadfall; particularly in areas affected by wildfire, insect and disease, and wind events. It was estimated that, in total, between 80,000 and 110,000 deadfall trees have fallen across the 150 miles of trail. It is likely that similar conditions exist on the remaining 392 miles of trail.

Summary

Trees killed or weakened by wildfire, insect and disease, and wind events have fallen, and continue to fall, and are blocking trails in the Frank. Deadfall is accumulating at a rate that agency staff, partners, and volunteers cannot keep pace with removing. Increased funding and capacity have only resulted in marginal gains.

In 2025, SCNF reconnaissance verified significant deadfall and trails that are largely unusable. In addition, the trails identified by IOGA represent a substantial (about 44%) of the trail system managed by SCNF in the Frank. The end result is diminished recreation opportunities within the Frank.

[2] IOGA proposal included two trails (Big Chief Trail (NFST 4224) and Hot Creek Ridge Trail (NFST 4248)) that are listed in the Frank management plan as unmaintained. The SCNF dropped these two trails from consideration. The original proposal was 63 trails (552 miles). After dropping these two trails from consideration, the proposal includes 61 trails on 542 miles.

Options Outside of Wilderness
Is this issue wilderness dependent, or can an action occur outside of wilderness to properly resolve the issue now or over time?

Can the issue be resolved or addressed outside of wilderness?

☐ YES **STOP – EXPLAIN BELOW AND DO NOT TAKE ACTION**

☒ NO **EXPLAIN BELOW AND PROCEED TO THE NEXT SECTION**

The downed trees that are obstructing trails and resource impacts are occurring on trails that that are within wilderness. The IOGA proposal to clear trails is entirely within wilderness.

Criteria for Determining Necessity

Do any of the criteria below apply?

A. Wilderness Character
Based on the Issue Statement, are any of the qualities of wilderness character degraded, impaired, or threatened to a degree that it is necessary to analyze potential action otherwise prohibited by Section 4(c) to address the issue?

UNTRAMMELED

☐ YES ☒ NO

Trees falling is a natural process.

UNDEVELOPED

☐ YES ☒ NO

Downfall and the trail blockages caused by downfall on trails are not developments.

NATURAL

☐ YES ☒ NO

Trail blockages result in a loss of trails for human use and concentrates wilderness visitors on fewer available trails. This leads to increased impacts (e.g. wildlife habitat fragmentation, anthropogenic resistance) to natural ecological systems that come along with concentrated or higher densities of human use in an area. While it is worth noting

the impacts of concentrating visitor use to natural conditions, these impacts are negligible.

OUTSTANDING OPPORTUNITIES FOR SOLITUDE or PRIMITIVE and UNCONFINED RECREATION

☒ YES ☐ NO

The issue of trees blocking trail access at an extraordinary rate due to trees killed or weakened by fire and/or insect and/or disease infestations significantly affects outstanding opportunities for primitive and unconfined recreation. Opportunities for primitive trail-based recreation (e.g. hiking, backpacking, stock use, hunting) are severely impacted by the extraordinary number of trees down blocking trail access. Additionally, as many trails are impassable, use is concentrated on a subset of trails that are passable in the Frank. This impacts opportunities for solitude on those unblocked and now more frequently used trails, as the people using those trails are more likely to encounter others.

OTHER FEATURES OF VALUE

☐ YES ☒ NO

Other features of value are not impacted, threatened, or degraded due to the levels of downed trees and trails blockage.

B. Valid Existing Rights

Is action necessary to satisfy a valid existing right? If so, cite the specific right, terms and conditions, and source.

☐ YES ☒ NO

There are no valid existing rights impacted by downed trees blocking trail access.

C. Special Provisions of Wilderness Legislation

Is action necessary to satisfy a special provision in wilderness legislation (i.e., Section 4(d) of the Wilderness Act of 1964 or subsequent wilderness-enabling laws) that requires action? Cite law and section.

☒ YES ☐ NO

There is a provision in the Frank's enabling legislation directing the Secretary of Agriculture to clear trails of obstructions. The Central Idaho Wilderness Act (Public Law

96-312, July 23 1980) that established the Frank Church River of No Return Wilderness in Section 5(a)(1)(5)(b) states, “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 system trails within or adjacent to the wilderness on at least an annual basis”.

The management plan for the Frank further sets trail maintenance expectations for each class of trail in Appendix J. Generally, level 3 or mainline trails receive a higher level of maintenance, including logging out (trail clearing, removing trees from blocking the trail), annually. Level 2 or secondary trails receive maintenance every 1-3 years (including logging out), and level 1 or lower priority trails receive a lower quality of maintenance every 1-5 years (including keeping tread passable).

D. Requirements of Other Federal Laws

*Not including special provisions found in wilderness-enabling laws, does another Federal law, by itself or as implemented or interpreted through EO, court order, etc., **require** action? Cite law and section.*

☒ YES ☐ NO

Executive Order 14313 requires action to address “neglect of routine maintenance” to, among other things, “expand access to public lands and waters for recreation, hunting, and fishing.”

Step 1: Determination – Is Administrative Action Necessary in Wilderness?

Based on the responses and detailed explanations in A through D above, is there a need to proceed to Step 2? If at least one criterion in B through D in Step 1 has been met, or at least one quality of wilderness character is threatened, check the “Yes” box and provide a thorough explanation of the rationale described in A through D. It may also be helpful to describe in this determination how action would be consistent with the public purposes of wilderness or satisfy a specific agency obligation. If none of the criteria have been met, action is NOT necessary. Check the “No” box, explain why the proposed project does not meet the criteria, and stop your analysis.

☒ YES **EXPLAIN BELOW AND COMPLETE STEP 2 OF THE MRAF**

☐ NO **STOP – EXPLAIN BELOW AND DO NOT TAKE ACTION**

Yes, administrative action is necessary to respond to the extraordinary level of downed trees blocking trails in the Frank for two reasons.

The first is the impact of the trails being impassable on the outstanding opportunities for primitive and unconfined wilderness character in the Frank. The extent of the downed trees on trails due to wildfire and insect and/or disease killed trees that have fallen is having significant impacts to the primitive recreation quality, in many cases prohibiting use of trails. The trails identified by IOGA make up about 44% of the total miles of trail in the SCNF managed portion of the Frank and are effectively unusable. The loss of access is affecting hikers, backpackers, stock supported pack trips, and hunters who cannot experience the outstanding primitive and unconfined wilderness recreational opportunities that the Frank has to offer.

The second reason action is necessary is that the legislation creating the Frank sets an expectation of a functional trail system. The Central Idaho Wilderness Act in Section 5(a)(1)(5)(b) states, “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 system trails within or adjacent to the wilderness on at least an annual basis”. The Act specifically uses the word “shall” when addressing the clearing of obstructions.

Step 2: Determine the Minimum Activity

Other Direction

Is there "special provisions" language in legislation or other congressional direction that explicitly allows consideration of (but does not require) a prohibited use? (Step 1 has a similar question in Section C, but that question is specific to other legislation requiring action in wilderness; this question is specific to other legislation addressing consideration of prohibited uses).

AND/OR

Has the issue been addressed or prescribed in agency policy, management plans, or legal directive (e.g., treaty, EO, court order, or other binding agreement with federal, state, or local agencies or authorities)?

☒ YES **DESCRIBE OTHER DIRECTION**

☐ NO **SKIP TO "UNCONTROLLABLE TIMING REQUIREMENTS" BELOW**

There is a special provision in the Frank's enabling legislation directing the Secretary of Agriculture to clear trails of obstructions. The Central Idaho Wilderness Act (Public Law 96-312, July 23 1980) that established the Frank Church River of No Return Wilderness in Section 5(a)(1)(5)(b) states, "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 system trails within or adjacent to the wilderness on at least an annual basis."

In addition, the legislative history from the House of Representatives for the Central Idaho Wilderness Act provides additional context for trail maintenance. It states that:

> The 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 plant succession, or create unnecessary conflicts with primitive recreational use."

The specific language stating that trails shall be cleared of obstructions annually, to the maximum extent practicable, allows for consideration of a 4(c) prohibited use. Considering the use of motorized and mechanized equipment, under certain circumstances to meet the intent of the Central Idaho Wilderness Act is an option that is both practicable and within law, regulation, and FS policy.

Uncontrollable Timing Requirements
What, if any, are the considerations that would dictate timing of the action?

There are no uncontrollable timing requirements.

Workflow Components
What are the distinct components or phases of the action?

Example	*Transportation of personnel to the project site*
Component 1	Transportation of personnel to/from the sites where downed trees need to be cleared.
Component 2	Transportation of tools/materials to/from the sites where downed trees need to be cleared.
Component 3	Clearing downed trees that are blocking trails.

Feasibility of Alternatives
Only include feasible alternatives in this section. Some alternatives that are not feasible may warrant documentation in the "Alternatives Considered but Dismissed" section to provide a brief description and explanation of why it was dismissed and not considered in detail.

Possible reasons for dismissal include alternatives that are impossible, have unacceptable impacts, are unsafe, are proven ineffective, have excessive costs, or whose timing would cause degradation to wilderness character.

The alternatives should also be reasonable. For example, there is no need to include helicopters in an alternative for equipment transport when that equipment can be easily carried by people or pack stock along a maintained trail.

Refer to the MRAF instructions regarding alternatives and the effects to each of the comparison criteria.

Step 2: Alternatives

Alternative 1:

Use non-motorized and non-mechanized means to clear downed trees from trails in areas of the Frank significantly impacted by deadfall trees.

Component Methods

How will each of the components of the action be performed under this alternative?

Component	Workflow Components	Component Methods for this Alternative
	Example: Transportation of personnel to the project site.	*Example: Workers walk to work site.*
1	Transportation of personnel to/from the sites where downed trees need to be cleared.	Personnel will travel on foot or by stock.
2	Transportation of tools/materials to/from the sites where downed trees need to be cleared.	Tools/material will be carried by people or stock animals.
3	Clearing deadfall trees that are blocking trails.	Hand tools (e.g., handsaws, crosscut saws, and axes) will be used to clear downed trees from trails.

Description of the Alternative

What are the details of this alternative? When, where, and how will the action occur? What mitigation measures will be taken? Provide a complete narrative description of the Component Methods identified above.

Trail maintenance on the 542 miles of trail that IOGA proposed for consideration for chainsaw use using hand tools (crosscut saws, hand saws, and axes). Transport of people, equipment, and materials will be by foot or pack stock.

Trail maintenance will continue as it has traditionally, and the Forest Service and partners will continue to look for additional funding and resources to clear downed trees on the trails identified in the IOGA proposal.

Wilderness Character

Component Number	For each component number, indicate the impact the **method for this alternative** will have on each of the five qualities of Wilderness: Positive = P, Negative = N, No Effect = 0 *Describe in detail the impacts to each of the five qualities in the narrative section below*	Untrammeled	Undeveloped	Natural	Solitude or Primitive and Unconfined	Other Features of Value
	Example: Workers walk to work site.	0	0	0	0	0
1	Personnel will travel on foot or by stock.	0	0	0	N	0
2	Tools/material will be carried by people or stock animals.	0	0	0	N	0
3	Hand tools (handsaws, crosscut saws, axes) will be used to clear downed trees from trails.	N	N	N	P	0

What is the effect of each Component Method on the qualities of wilderness character? What mitigation measures will be taken? Include cumulative impacts in the explanation.

UNTRAMMELED: Explain the intensity of the action that would intentionally control, manipulate, or hinder the conditions or processes of ecological systems:

No Effect: Personnel traveling on foot or by stock and transporting needed tools and materials will not affect the condition or processes of ecological systems within the Frank.

Negative Effect: Clearing deadfall from trails, regardless of method, will have a minor negative effect on the untrammeled character of the Frank by manipulating ecological systems to some small degree. This effect is minimal and allowed in designated wilderness throughout the country.

UNDEVELOPED: Explain the effects to this quality in terms of how “the imprint of man’s work [would] remain substantially unnoticeable,” and how wilderness will continue to be in contrast with other areas of “growing mechanization”:

No Effect: Personnel traveling by foot or stock and transporting tools and materials to will have no effect on the undeveloped character of the Frank and do not represent a “growing mechanization” or a substantial “imprint of man’s work” in wilderness.

Negative Effect: Clearing deadfall trees will be a “noticeable impact of man’s work.” Cut trees, stump ends, and a cleared path to travel on will be obvious and clearly identifiable in contrast to other areas of the Frank where there are no trails and downed trees are present.

NATURAL: Explain the effects to this quality in terms of protection, degradation, or restoration of natural conditions:

No Effect: Personnel traveling by foot or stock and transporting tools and materials to will have no effect on the natural character of the Frank.

Negative Effect: Clearing deadfall trees will have minimal negative effect to natural conditions of the Frank. Downed trees naturally filter erosion, provide wildlife habitat, and provide benefits to plants and water quality. The sounds of workers clearing trails, including pounding wedges, using axes and sawing, is at or below 85 decibels and may have a minor negative effect on wildlife. However, these represent minor negative effects to the ecological systems within the Frank.

OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE and UNCONFINED RECREATION: Explain how opportunities for visitors to experience solitude or a primitive and unconfined type of recreation will be protected or degraded. As appropriate, describe solitude, primitive recreation, and unconfined recreation separately**:**

Negative Effect: Personnel traveling by foot or stock and transporting tools and materials to will have a slight negative effect on the outstanding opportunities for solitude in the Frank. This is because visitors may see people and stock along the trail. However, it is expected to be a minimal impact because trails are blocked with deadfall and are receiving little or no use.

The sounds of trail clearing (e.g., crosscut sawing or pounding wedges) will also be noticeable. In general, using hand tools to complete trail maintenance is at or below 85 decibels. While it is unlikely that visitors will be using these trails because they are blocked by deadfall, the act of trail clearing with hand tools carries the potential for minor noise impacts on opportunities for solitude.

Positive Effects: In general, clearing trails of deadfall improves opportunities for primitive and unconfined recreation (hiking, backpacking, travel with stock, hunting, etc.) and provides more trail based opportunities for people to find solitude. However, using hand tools to remove deadfall is unlikely to improve the condition on the 542 miles of trail identified by IOGA.

In 2016, the SCNF increased both funding and capacity for trail maintenance and has not been able to make gains on trail maintenance on a substantial portion of the trail system in the Frank. The rate trees fall across the trail system is simply greater than the workforce capacity can keep up with.

Under this alternative, it is unlikely that crews will have the capacity to address the 542 miles of trail identified by IOGA using hand tools.

OTHER FEATURES OF VALUE: Explain any effects to features of scientific, educational, scenic, or historical value that are not accounted for in the above qualities, including cultural and paleontological resources that are integral to wilderness character:

No Effect: There are no other features of value that would be impacted.

Alternative 2:

Use gas powered chainsaws to clear downed trees from trails in areas of the Frank significantly impacted by deadfall trees.

Component Methods

How will each of the components of the action be performed under this alternative?

Component	Workflow Components	Component Methods for this Alternative
	Example: Transportation of personnel to the project site.	*Example: Workers walk to work site.*
1	Transportation of personnel to/from the sites where downed trees need to be cleared.	Personnel will travel on foot or by stock.
2	Transportation of tools/materials to/from the sites where downed trees need to be cleared.	Tools/material will be carried by people or stock animals.
3	Clearing deadfall trees that are blocking trails.	Gas powered chainsaws will be used to clear downed trees from trails.

Description of the Alternative

What are the details of this alternative? When, where, and how will the action occur? What mitigation measures will be taken? Provide a complete narrative description of the Component Methods identified above.

Trail maintenance on 542 miles of trail that IOGA proposed for consideration for chainsaw use using gas powered chainsaws. Transport of people, equipment, and materials will be by foot or pack stock.

Travel and transport of tools/materials to and from the work sites is the same as Alternative 1. The SCNF has approximately 20 pack animals available to transport tools/materials and each animal can carry 120-160 lbs. It is expected that we can transport chainsaws, gas, and bar oil for crews to reach remote sections of the Frank for 8-10 days at a time and be able to operate chainsaws for that entire time.

Gas powered chainsaw use will be limited from January 1st to August 1st to avoid conflicts during hunting season and when most of the public use these areas.

Mitigation Measures

1. Chainsaw use would be limited to a 3-year period.

2. Gas powered chainsaw use would be limited to January 1st to August 1st each year.

Wilderness Character

Component Number	For each component number, indicate the impact the **method for this alternative** will have on each of the five qualities of Wilderness: Positive = P, Negative = N, No Effect = 0 *Describe in detail the impacts to each of the five qualities in the narrative section below*	Untrammeled	Undeveloped	Natural	Solitude or Primitive and Unconfined	Other Features of Value
	Example: Workers walk to work site.	0	0	0	0	0
1	Personnel would travel on foot or by stock.	0	0	0	N	0
2	Tools/material would be carried by people or stock animals.	0	0	0	N	0
3	Gas powered chainsaws would be used to clear downed trees from trails.	N	N	N	P	0

What is the effect of each Component Method on the qualities of wilderness character? What mitigation measures will be taken? Include cumulative impacts in the explanation.

UNTRAMMELED: Explain the intensity of the action that would intentionally control, manipulate, or hinder the conditions or processes of ecological systems:

No Effect: Personnel traveling by foot and/or stock and transporting tools by foot or by stock and materials will not affect the condition or processes of ecological systems within the Frank.

Negative Effect: Clearing deadfall from trails, regardless of method, will have a minor negative effect on the untrammeled character of the Frank by manipulating ecological systems to some small degree. This effect is minimal and allowed in designated wilderness throughout the country.

UNDEVELOPED: Explain the effects to this quality in terms of how “the imprint of man’s work [would] remain substantially unnoticeable,” and how wilderness will continue to be in contrast with other areas of “growing mechanization”:

No Effect: Personnel traveling by foot and/or stock, transporting needed tools and materials to clearing trees that have fallen and are blocking trails will have no effect on the undeveloped character of the Frank and do not represent “growing mechanization” or a substantial “imprint of man’s work” in wilderness.

Negative Effect: The cutting and clearing of downed trees blocking trail access will be a noticeable “imprint of man’s work.” Cut trees, stump ends, and a cleared path to travel on will be obvious and clearly identifiable in contrast to other areas of the Frank where there are no trails and downed trees are present.

Using gas powered chainsaws also represents a “growing mechanization” in wilderness.

NATURAL: Explain the effects to this quality in terms of protection, degradation, or restoration of natural conditions:

No Effect: Personnel traveling by foot and/or stock, transporting needed tools and materials will have no effect on the natural character of the Frank.

Negative Effects: Clearing deadfall trees will have a minor negative effect on natural conditions of the Frank. Downed trees naturally filter erosion, provide wildlife habitat, and provide benefits to plants and water quality.

The noise level of gas powered chainsaws is around 100-120 decibels or greater. This noise level is greater than using hand tools under Alternative 1. The noise from gas powered chainsaws may have a minor negative effect on wildlife but will not have a long-term effect on natural conditions in the Frank.

OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE and UNCONFINED RECREATION: Explain how opportunities for visitors to experience solitude or a primitive and unconfined type of recreation will be protected or degraded. As appropriate, describe solitude, primitive recreation, and unconfined recreation separately**:**

Negative Effects: Personnel traveling by foot and/or stock or transporting tools and materials to clear trees that have fallen and are blocking trails will have a slight negative effect on the outstanding opportunities for solitude in the Frank. This is because visitors may see people and stock along the trail. However, it is expected to have a minimal impact because trails are blocked with deadfall and are receiving little or no public use.

The trail clearing would be completed by gas powered chainsaws that can produce noise levels of between 100-120 decibels. If visitors are in the area, their experiences may be impacted from the sights and sounds of this activity. The sound impacts from utilizing gas powered chainsaws, although noticeable, will be limited to the between January 1st and August 1st, when visitor use in this area is low (see SCNF National Visitor Use Monitoring Results at https://www.fs.usda.gov/about-agency/nvum).

Positive Effects: Clearing trails of deadfall improves opportunities for primitive and unconfined recreation (hiking, backpacking, travel with stock, hunting, etc.) and provides more trail based opportunities for people to find solitude.

Gas powered chainsaws are more efficient at cutting deadfall trees than hand tools or battery powered chainsaws. They can cut through deadfall 2 to 5 times faster than hand tools and require significantly less energy to operate. In addition, chainsaw runtime is not limited by batteries. Due to the efficiency of gas-powered chainsaws, we expect that significantly more deadfall can be removed and trail miles maintained under Alternative 2 when compared to Alternative 1 or Alternative 3.

Over a 3-year period, it is likely that most of the deadfall on the 542 miles of trail IOGA proposed could be removed. This would have the effect of opening these trails to public use and providing additional opportunities for trail-based recreation and increase the miles of trail that can be used for trail-based recreation.

OTHER FEATURES OF VALUE: Explain any effects to features of scientific, educational, scenic, or historical value that are not accounted for in the above qualities, including cultural and paleontological resources that are integral to wilderness character:

No Effect: There are no other features of value that would be impacted.

Alternative 3:

Use battery powered chainsaws to clear downed trees from trails in areas of the Frank significantly impacted by deadfall trees.

Component Methods

How will each of the components of the action be performed under this alternative?

Component	Workflow Components	Component Methods for this Alternative
	Example: Transportation of personnel to the project site.	*Example: Workers walk to work site.*
1	Transportation of personnel to/from the sites where downed trees need to be cleared	Personnel would travel on foot or by stock.
2	Transportation of tools/materials to/from the sites where downed trees need to be cleared.	Tools/material would be carried by people or stock animals.
3	Clearing downed trees that are blocking trails.	Battery powered chainsaws would be used to clear downed trees from trails.

Description of the Alternative

What are the details of this alternative? When, where, and how will the action occur? What mitigation measures will be taken? Provide a complete narrative description of the Component Methods identified above.

This alternative is the same as Alternative 2, except battery-powered chainsaws will be used instead of gas-powered chainsaws.

Mitigation Measures

1. Battery chainsaw use would be limited to a 3-year period.

2. Battery chainsaw use would be limited to January 1st to August 1st.

Wilderness Character

Component Number	For each component number, indicate the impact the **method for this alternative** will have on each of the five qualities of Wilderness: Positive = P, Negative = N, No Effect = 0 *Describe in detail the impacts to each of the five qualities in the narrative section below*	Untrammeled	Undeveloped	Natural	Solitude or Primitive and Unconfined	Other Features of Value
	Example: Workers walk to work site.	0	0	0	0	0
1	Personnel would travel on foot or by stock.	0	0	0	N	0
2	Tools/material would be carried by people or stock animals.	0	0	0	N	0
3	Battery powered chainsaws would be used to clear downed trees from trails.	N	N	N	P	0

What is the effect of each Component Method on the qualities of wilderness character? What mitigation measures will be taken? Include cumulative impacts in the explanation.

UNTRAMMELED: Explain the intensity of the action that would intentionally control, manipulate, or hinder the conditions or processes of ecological systems:

Same as Alternative 2.

UNDEVELOPED: Explain the effects to this quality in terms of how “the imprint of man’s work [would] remain substantially unnoticeable,” and how wilderness will continue to be in contrast with other areas of “growing mechanization”:

Same as Alternative 2.

NATURAL: Explain the effects to this quality in terms of protection, degradation, or restoration of natural conditions:

Same as Alternative 2; however, battery powered chainsaws are slightly quieter (around 85-100 decibels) than gas chainsaws and would likely have less impact to wildlife from noise.

OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE and UNCONFINED RECREATION: Explain how opportunities for visitors to experience solitude or a primitive and unconfined type of recreation will be protected or degraded. As appropriate, describe solitude, primitive recreation, and unconfined recreation separately**:**

Negative Effect: Same as Alternative 2; however, the trail clearing will be completed by battery powered chainsaws that produce noise levels of about 85-100 decibels, which is slightly less than gas powered chainsaws. Noise levels for the use of hand tools (crosscut saws, hand saws, and axes) to clear trails is at or below 85 decibels. The use of battery powered chainsaws to clear trails will produce noise levels at or slightly more than the use of hand tools.

If visitors are in the area, their experiences may be impacted from the sights and sounds of this activity. The sound impacts from utilizing battery powered chainsaws, although noticeable, would be limited to the between January 1st and August 1st, when visitor use in this area is low (see SCNF National Visitor Use Monitoring Results at https://www.fs.usda.gov/about-agency/nvum).

Positive Effect: Clearing trails of deadfall improves opportunities for primitive and unconfined recreation (hiking, backpacking, travel with stock, hunting, etc.) and provides more trail-based opportunities for people to find solitude. However, using battery powered chainsaws to remove deadfall is unlikely to improve the condition on the 542 miles of trail. While battery powered chainsaws are more efficient at clearing deadfall than hand tools, they are less efficient than gas powered chainsaws.

Battery powered chainsaws for trail maintenance on the 542 miles of trail are unlikely to be effective given the large amount of deadfall. Volumes of deadfall this substantial will require prolonged chainsaw work. The runtime for a single battery on a battery powered chainsaw is 45 minutes or less before recharging is required. In addition, the remoteness of the trail system further necessitates solar or power bank charging that cannot keep up with the level of chainsaw use needed to clear the trail system. The volume of deadfall and short battery life will require frequent charging and a large number of batteries. This along with solar power charging systems will add weight to the transportation of tools to complete the work and complexity into the clearing operations.

Considering average deadfall of 500 to 700 trees per mile over 542 miles of trail, it is unlikely that significant portions of the trail system will be cleared.[3]

Over a 3-year period, it is unlikely that a significant amount of deadfall on the 542 miles of trail IOGA proposed could be removed. Crews may be able to address short sections of the trail system; however, they are unlikely to remove enough deadfall that the trails ae usable by the public.

OTHER FEATURES OF VALUE: Explain any effects to features of scientific, educational, scenic, or historical value that are not accounted for in the above qualities, including cultural, and paleontological resources that are integral to wilderness character:

No Effect: There are no other features of value that would be impacted.

[3] See Battery Powered Chainsaw Saw Evaluations 2323–2804–NTDP which concludes that "[t]hey are not currently a good solution in work situations that require saws to run for prolonged periods of time."

Step 2: Alternatives Considered but Dismissed

What alternatives were considered but dismissed? Why were they dismissed?

Explain:

1. Blasting was considered but dismissed due to the large number of trees down and the quantity of explosives that would be needed and associated safety issues with handling that quantity of explosives.
2. Allowing the trails to naturally close themselves and taking the trails off maps and amending the Frank Church Management Plan was considered but dismissed due to the Central Idaho Wilderness Act language regarding maintaining trails annually as well as the loss of recreation opportunities.
3. Allowing chainsaw use on all trails on the SCNF within the Frank was considered but dismissed because we are targeting a specific portion of trail system with significant deadfall. Not all trails have this issue and some trails do not pass through fire affected and/or insect/disease infected areas where significant deadfall is likely.
4. The use of crosscut saw “strike teams” and/or obtaining additional funding to hire personnel or contractors and/or through agreements with partners obtain a larger workforce to clear these trails with crosscut saws was considered. This approach was tried beginning in 2016 following the 2016 Trails Stewardship Act (see Issue Statement) and Great America Outdoors Act and were not successful in removing deadfall from a substantial portion of the Frank.

Step 2: Determination – What is the Minimum Activity?

Selected Alternative

Recommendation: Alternative 2: Use gas powered chainsaws to clear deadfall trees from trails on the 542 miles of trail identified by IOGA.

Explain rationale for selection, including a comparison of the selected alternative with other alternatives:
Alternative 2 was selected because it best balances the need to provide recreation opportunities while maintaining wilderness values.

The vast quantity of deadfall on the SCNF managed portion of the Frank is substantially limiting recreation opportunities. The quantity of deadfall is so great that visitors cannot use these trails and crews cannot meet the maintenance levels in the Frank Plan. While we have used hand tools in the past to complete trail maintenance, these methods are much less efficient than gas or battery powered chainsaws and cannot keep up with the rate or quantity of trees that are falling and blocking trails. Battery powered chainsaws are impractical and unlikely to effectively address the issue given the short battery life and weight and large numbers of batteries and solar or power bank charging systems that would be needed coupled with the volume of trees that need to be cleared. The only practical and efficient means of addressing this quantity of deadfall so that the public can use the trails and the Forest can meet the maintenance levels in the Frank Plan is to use gas powered chainsaws.

This situation is primarily due to wildfire and insect and disease. Trees in areas in the Frank that have experienced past wildfire and insect and disease have been weakened or killed and are extremely susceptible to wind events. Alternative 2 is targeted at addressing trail miles in these past wildfire and insect and disease areas where trail access is effectively blocked and cannot be used by the public.

The Wilderness Act directs that wilderness areas “shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” 16 U.S.C. § 1133(b). In addition, the Central Idaho Wilderness Act explicitly recognizes the importance of clearing obstructions from trails to provide recreation opportunities.[4] Addressing the deadfall situation will move the Frank closer to the intent

[4] The Central Idaho Wilderness Act (Public Law 96-312, July 23 1980) that established the Frank Church River of No Return Wilderness in Section 5(a)(1)(5)(b) states, “ In administering the River of No Return Wilderness, the

of both the Wilderness Act and Central Idaho Wilderness Act to provide outstanding recreation opportunities.

The use of gas-powered chainsaws also balances recreation values and negative effects to wilderness character. It provides for the only feasible method to open trails to public use and limits impacts on wilderness users and their experiences. Limiting the performance window to August 1 to complete deadfall clearing minimizes the impact to the natural character of wilderness to the extent possible and reduces the likelihood of noise impacts to visitors.

Secretary shall, to the maximum extent practicable, consistent with the management plan required by this section, clear obstructions from all of the national forest system trails within or adjacent to the wilderness on at least an annual basis".

Approved?	Prohibited Use	Quantity, Timing, Frequency, or Duration
☐	Mechanical Transport:	Click or tap here to enter text.
☒	Motorized Equipment:	Gas powered chainsaws annually prior to August 1st for a period of three years.
☐	Motor Vehicles:	Click or tap here to enter text.
☐	Motorboats:	Click or tap here to enter text.
☐	Landing of Aircraft:	Click or tap here to enter text.
☐	Temporary Roads:	Click or tap here to enter text.
☐	Structures:	Click or tap here to enter text.
☐	Installations:	Click or tap here to enter text.

Describe mitigation measures as well as monitoring and reporting requirements, if appropriate:

Mitigation Measures

1.Gas powered chainsaw use would be limited to a 3-year period.

2.Gaspowered chainsaw use would be limited to January 1st to August 1st.

Approvals

Salmon-Challis National Forest Frank Church River of No Return Wilderness Area Trail Maintenance

Refer to agency policies for the following signature authorities:

Prepared by:

Name Joshua Milligan Position Deputy Forest Supervisor

Signature Joshua Milligan Date 05/08/2026

Reviewed by:

Name Heather DeGeest Position Forest Supervisor

Enter reviewer comments here.

Signature HEATHER DEGEEST Digitally signed by HEATHER DEGEEST Date: 2026.05.11 17:38:13 -06'00' Date

Reviewed by:

Name Click or tap here to enter text. Position Click or tap here to enter text.

Signature Date

Enter reviewer comments here.

Approved by:

Name Click or tap here to enter text. Position Click or tap here to enter text.

Signature Digitally signed by MICHIKO MARTIN Date: 2026.05.12 15:26:23 -06'00' Date