



October 28, 2008

Margaret Hartzell  
Forest Plan Revision Team Leader  
Okanogan-Wenatchee National Forest  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Margaret:

The Wilderness Society (TWS) is pleased to provide these comments on the forest planning process underway for the Okanogan-Wenatchee National Forest Plan Revision. We understand the Forest Plan Revision Team is working on a draft Forest Plan that will be reviewed at both the Regional and Washington DC levels within the next several months. Since the forest plan revision process is a new one, and there does not appear to be any established comment period, we wanted to make sure our views regarding the forest plan revision for the Okanogan-Wenatchee National Forest are known to the U.S. Forest Service.

Founded in 1935, TWS is one of the nation's oldest and largest non-profit conservation organizations. Our mission is to protect wilderness and inspire Americans to care for our wild places. Toward this end, we work in partnership with local communities, businesses, conservation organizations and local citizens to find solutions for the preservation and stewardship of our national public lands.

TWS has been involved in National Forest issues since its inception and its founders include such notable foresters as Aldo Leopold and Bob Marshall. TWS has focused its attention on National Forests and other federal public lands because that is where most of this country's wild lands remain, and because we believe America's laws give strong conservation stewardship direction to the US Forest Service for protecting the lands managed in trust for the American people. In the Pacific Northwest we have participated in producing and monitoring implementation of the 19 National Forest land management plans, including the Okanogan and Wenatchee National Forest Plans. As you develop the Forest Plans for these National Forests, TWS urges you to consider the viewpoints expressed below regarding a National Forest Vision, the legal requirements for developing a forest plan, the North Cascades as a very special landscape, global warming as an issue that must be addressed in the forest plan revision, the socio-economic value of the forest, recreation as a critical value of the forest that must be managed appropriately, Wild and Scenic Rivers evaluation, maintaining the option of citizens and Congress to protect eligible lands as wilderness, and the importance of developing a thorough and

*Wilderness. Pass It On.*

720 Third Avenue • Suite 1800 • Seattle, WA 98104 • 206.624.6430 p • 206.624.7101 f • [www.wilderness.org](http://www.wilderness.org) • [www.experiencewilderness.org](http://www.experiencewilderness.org)

*Pacific Northwest Region*

scientifically credible forest plan which promotes wise stewardship of our publically owned forests.

## **I. A Forest Vision**

The National Forests belong to all the American people, and the U.S. Forest Service should manage those lands sustainably and in the public interest. TWS is committed to ensuring that National Forests provide a magnificent natural legacy for future generations. We believe National Forests should produce clear water, clean air, wildlife habitat, and biological diversity, as well as outdoor recreation, timber, livestock forage, and other commodities where appropriate. As the cornerstone for large-scale ecosystem protection, the National Forests should emphasize public land values and opportunities -- such as wilderness -- which are rare or absent on other forest lands. TWS has articulated a vision for the National Forest System. The central components to this vision are:

1. The integrity, health, and sustainability of wildland ecosystems shall be the goal of all management;
2. Do no harm to the forest environment;
3. Planning and management shall be based on the best available information and scientific understanding;
4. Management activities shall be economically sound and foster growth of natural asset values;
5. Citizens shall have the opportunity to participate in the decision-making processes affecting their public forests.

For additional clarification about our vision, you can link to our web site at:

<http://65.110.78.8/OurIssues/Forests/visionachieving.cfm>

## **II. North Cascades Initiative**

Recently, TWS has launched an initiative to focus attention on the North Cascades. This landscape stretches from I-90 on the south to the Canadian border and from Puget Sound to the eastern extent of the watersheds draining off the Cascade crest. The Wilderness Society and its partners envision the North Cascades as a celebrated national treasure, where recreational opportunities are enhanced and well-planned, where local communities are vibrant and sustainable and where this unique landscape is preserved for generations to come.

This vast, largely intact ecosystem is capable of supporting healthy populations of wide-ranging wildlife. It has the highest concentration of glaciers in the continental U.S., and the clear, cold rivers fed by those glaciers contribute much of the fresh water that flows into Puget Sound to the west and the Columbia River to the east. These river systems support populations of endangered wild salmon, provide water for people and agriculture, and yield hydroelectric power that supports a significant element of the region's economy. The North Cascades also boast some of the best wildland recreation the Pacific

Northwest has to offer. Additionally, this region is facing challenges associated with increasingly expanding human populations and global climate change. For these reasons, TWS currently has a long-term dedication to the North Cascades region which includes a vision of a landscape where protected wildlands sustain vibrant and healthy human and natural communities.

### **III. Landscape Approach**

The Okanogan-Wenatchee National Forest is an integral part of the North Cascades landscape and ecosystem. The land management decisions of the Okanogan-Wenatchee National Forest must be considered in the context of the entire landscape. Especially with the changes associated with global warming and increased population growth, the management of the Forest cannot be considered in isolation. Impacts of changes in climate, pollution, land-use, and recreational patterns both inside and outside of the Forest do and will interact with the condition of these public lands. To preserve viable, healthy wild landscapes, the most pristine areas, and also those areas and those ecosystem processes (e.g. natural fire regimes or hydrological flows) that play a critical role in the overall maintenance of the integrity and resiliency of the landscape, must be protected. Habitat corridors, for instance, that maximize the ability of plants and animals to migrate within a landscape or between landscapes must remain permeable to target species. Buffer zones around protected cores must be utilized in order to provide room for inevitable shifts in suitable habitat conditions and locations of plant communities and associated species. The plan set out in the Revision must include a thorough consideration of cumulative impacts and effects with the goal of maintaining the integrity of the Forest and the public services that it provides.

Specifically pertaining to the wilderness evaluation component of the Plan Revision, this means that each Potential Wilderness Area cannot be considered in isolation, but that the impact on the overall wilderness system on the Forest and within the context of the National Wilderness System must be analyzed.

### **IV. Global Warming**

The Earth's climate is changing and has the potential to seriously affect the Okanogan-Wenatchee National Forest. Global warming within the Pacific Northwest is projected to result in increased annual precipitation but, unfortunately, little or no increase in summer precipitation. The net effect is that projected climatic changes in the region will produce, on average, longer and more intense summer droughts, resulting in negative consequences for forest health.<sup>1</sup>

The current Land and Resource Management Plans for the Okanogan-Wenatchee National Forest do not address climate change as an issue, and the plans do not offer

---

<sup>1</sup> Franklin, J.F.F., J. Swanson, M.E. Harmon, and others. 1991. Effects of global climatic change on forests in northwestern North America. *Northwest Environmental Journal*, 7:233-254.  
Westerling, A.L., H.G. Hidalgo, D.R. Cayan, T.W. Swetnam. 2006. Warming and Earlier Spring Increase Western U.S. Forest Wildfire Activity. *Science* 313(5789):940-943.  
Johnson, K.N., J.F.F. Franklin, and D.L. Johnson. 2007. A Plan for the Klamath Tribes Management of the Klamath Reservation Forest.

management strategies addressing global warming. This is a significant issue deserving extensive discussion, and it is important to our National Forests on several counts including:

1. Climate fluctuations may have a strong impact on frequency and severity of insect outbreaks and fire;
2. Forests play a large and critical role in storing carbon which may provide a key strategy for how our society addresses global warming;
3. Climate fluctuations may have a strong impact on the quality, quantity and timing of water flowing from our National Forest lands;
4. Climate fluctuations can cause the disappearance of vegetative communities and shifts in species' ranges.

Forest management plans can be developed to address the issue of global warming. Dr. Jerry Franklin and Dr. Norm Johnson recently developed a Forest Plan for the Klamath Tribe in which they addressed climate change issues.<sup>2</sup> Their recommendations include:

“Reducing competition and the potential for drought-induced stress by reducing overall densities;

Reducing the potential for intense wildfires by lowering overall fuel levels and maintaining them at low levels through prescribed burning programs;

Favoring the most drought-tolerant and fire resistant species—ponderosa pine—over Douglas-fir and, especially, grand fir; and;

Conserving old-growth trees, which are most resistant to drought and wildfire.”

According to Franklin and Johnson, the Tribe’s plan to conserve the old-growth trees from both fire and competition “is precisely the strategy that is most appropriate for managing forests under a regime of increasing temperatures and summer moisture deficits.”

The North Cascades are home to the largest concentration of glaciers in the lower 48 states. These glaciers not only form the core of the iconic scenic and tourism component of the ecoregion, but are also critical in providing clean water for communities, agriculture, recreation, the fishing industry, and energy production throughout the region. The North Cascade Glacier Climate Project has monitored 47 glaciers in the North Cascades for the past 25 years. All 47 glaciers are receding. Project Director, Mauri Pelto of Nichols College, has declared Lyman Glacier in the Wenatchee National Forest as dying. In his most recent report, Pelto states “This recession is widespread. All 47 monitored glaciers are receding and four have disappeared completely.” One of the four glaciers that have disappeared is Spider Glacier north of Lake Wenatchee<sup>3</sup>.

---

<sup>2</sup> “A Plan for the Management of the Klamath Forest,” Norman K. Johnson, Jerry F. Franklin, and Debora L. Johnson, May 2008. Website: <http://www.klamathtribes.org/forestplan.htm>

<sup>3</sup> “North Cascades Glacier Climate Project,” Mauri S. Pelto, Director. Nichols College, Dudley, MA. 2006. Website: [http://www.nichols.edu/departments/Glacier/glacier\\_retreat.htm](http://www.nichols.edu/departments/Glacier/glacier_retreat.htm)

Changes due to global warming also may have increased the incidence of disastrous flooding throughout the region. Recent flooding includes road washouts in Icicle Creek and Stehekin. While Stehekin is in a National Recreation Area, the waters that feed the Stehekin River come from the Wenatchee National Forest, showing the necessity of a landscape approach to planning across the borders of the National Parks and Forests.

As discussed above, global warming will continue to drive shifts in vegetation communities and species' ranges. In order to support the ability of these communities and species to persist into the future, they must be given the opportunity to move to newly suitable locations. Thus, maintaining permeability of habitat corridors linked to core habitat areas is essential to the survival of ecosystem integrity.

In the face of the undeniable and challenging impacts of global warming, the Forest Plan must apply the best state of the science of conservation biology, including a significant and sufficient commitment of resources to critical monitoring and genuine adaptive management.

## **V. Economics**

### **A. The Okanogan-Wenatchee National Forest is critical to our social and economic system.**

The Okanogan-Wenatchee National Forest contains some of the most valuable wildlands in the Pacific Northwest. It is an integral part of a landscape on both sides of the Cascade Mountains that forms one of the largest intact ecosystems in the continental United States. At more than 3.2 million acres in size, the Okanogan-Wenatchee National Forest is critical to the health of its surrounding human communities as well home to an amazing diversity of species, several listed as threatened or endangered. This intact system has substantial economic value and provides considerable benefits to Washingtonians and Americans who are the owners of this forest.

Wildlands produce both direct and indirect economic value for nearby communities. These include increases in private property values near wildlands and protected areas. They also include the value produced when people use such lands for hunting, fishing, hiking, and other activities. Okanogan-Wenatchee wildlands produce clean drinking water for communities and water for irrigation. Our National Forests also add value through carbon storage. Other ecosystem services, known as wilderness service values, include educational development, scientific discovery, personal physical health and growth, and community health and quality of life.

The Okanogan-Wenatchee plan revision should take into account the wealth of research that has identified the services and benefits of forest ecosystems. These ecosystem services have substantial economic value and provide important benefits to many people. The public enjoys the benefits from the existence of old growth trees and forest, wildlife, scenic landscapes, high quality and ample quantities of water, and recreational opportunities (with unique opportunities found on USFS land, and not as likely on private

land). Public forests in Washington also are being found to provide a key role in carbon sequestration and contributing to moderating climate change. As reported in 2008, Washington State has the greatest forest carbon density (metric tons CO<sub>2</sub> equivalent per acre) and the third largest forest carbon store (at 9,000 million metric tons CO<sub>2</sub> equivalent) in the lower 48 states.<sup>4</sup>

Although some of these ecosystem services are difficult to quantify, there are methodologies available to USFS that do so, and that could provide needed data and information. On the following page is a table of results from a 2001 International Journal of Wilderness report which quantifies some of the benefits of wilderness as of that time. Please note that non-wilderness lands within the Forest have associated economic values that are in addition to what is represented by the table.

---

<sup>4</sup> A. Ingerson and W. Loya. 2008. Measuring Forest Carbon: Strengths and Weaknesses of Available Tools. Science and Policy Brief. Washington, D.C., The Wilderness Society. Available at: <http://wilderness.org/Library/Documents/upload/FR7-28carbonbrief.pdf>

## Benefits of Wilderness

<i>Community Benefits</i> (includes local jobs and income from wilderness recreation, plus added jobs created by people attracted to areas high in wilderness amenities)	1 job and \$24,600 in personal income per year per 555 acres of eastern wilderness; 1 job and \$26,000 of personal income per year per 1,667 acres of western wilderness excluding Alaska – includes impact of spending by wilderness visitors only (i.e., does not include amenity-based development)
<i>Wilderness recreation</i>	\$44 per acre of eastern wilderness per year; \$15 per acre/year for western wilderness excluding Alaska
<i>Ecological services</i>	\$27 per acre (mid-range estimate for watershed protection, carbon storage for climate regulation and nutrient cycling for waste treatment only)
<i>Biodiversity Value</i>	No estimate given
<i>Off-site benefits</i> (includes making, selling, viewing photos, videos, etc.; real estate enhancement, etc.)	13% gain in value of residential land parcels near Vermont wilderness, for example
<i>Scientific Value</i> (the value of wilderness as a benchmark of ecological health and its value as a venue for scientific inquiry)	\$5 million per year (a rough estimate based on the value of wilderness-based articles in scientific journals only)
<i>Educational Value</i> (e.g. for teaching natural sciences as well as for teambuilding experiences, therapy, etc.)	No estimate given
<i>Passive Use Value</i> (the value the option to use a wilderness area, the value of passing wilderness on to future generations and the value of knowing that wilderness exists and is protected)	\$4 per acre of eastern wilderness per year; \$6.72 per acre/year for western wilderness excluding Alaska

Source: Loomis, J.B. and R. Richardson, 2001, Economic values of the U.S. wilderness system, *International Journal of Wilderness* 7(1):31-34. Available at: <http://www.wilderness.net/library/documents/loomis1.pdf>.

As the above table displays, the economic value of forests can and should be measured in more ways than just the value of resources extracted. There is a quantifiable economic benefit to human communities from ecosystems remaining intact and operating naturally. In September 2008, The Wilderness Society's Ecology and Economics Research Department (EERD) published a study of the economic values of the Tongass and

Chugach National Forests in Alaska<sup>5</sup>. The study found that the forests produce economic value far in excess of the extraction value. The study determined that Alaska's National Forest wildlands are worth as much as \$2 billion annually in economic benefit and impact. The Forest Service should give adequate consideration of these economic values as it does to resource extraction values.

The study of the Tongass and Chugach found that on-site recreation value was between \$75 million and \$115 million, the salmon harvest made possible by the forest ecosystem produces almost \$100 million annually and the ecosystem services value to Alaskan communities is \$365 million. The two National Forests in Alaska can be associated with almost \$300 million in fall and winter visitor expenditures. A study of the Okanogan-Wenatchee National Forests will determine the economic values of its intact ecosystems and should be considered along with resource extraction values.

**B. The Wilderness Society makes the following recommendations to the Okanogan-Wenatchee National Forest:**

1. Produce a scientifically credible economic analysis section in a DEIS.
2. Recognize there are many complex issues driving the economy of this region and of Washington State, including national and international trade policy.
3. Consider and evaluate a reasonable range of future economic scenarios of different alternatives.
4. Produce a credible analysis of the wood products industry which considers recent technological change in lumber manufacturing, and realistic stumpage markets.
5. Use appropriate and credible economic models for employment and revenue predictions.
6. Discuss and explain the economic modeling strategy used and the sensitivity of the results to external national and international economic conditions.
7. Recognize and consider the important role played by natural amenities in local and regional economies including acknowledgement of the important economic contributions of industries such as hunting, sports fishing, recreation and tourism.

**C. Additional References for Quantifying Ecosystems Services:**

- Bergstrom, J.C., J.M. Bowker and H. K. Cordell. 2005. An organizing framework for wilderness values, ed. H. K. Cordell, J. C. Bergstrom, and J. M. Bowker. State College, Pennsylvania, Venture Publishing Inc.
- Costanza, R., et al. 1998. "The value of the world's ecosystem services and natural capital." *Ecological Economics* 25, no 1.
- Englin, J., and R. Mendelsohn. 1991. A Hedonic Travel Cost Analysis for Valuation of Multiple Components of Site Quality: The Recreation Value of Forest Management. *Journal of Environmental Economics and Management*. 21:275-290.
- Freeman, A.M., III. 2003. *The Measurement of Environmental and Resource Values: Theory and Methods*. Resources for the Future, Washington, D.C.

---

<sup>5</sup> Phillips, S., R. Silverman, and A. Gore. 2008. *Greater Than Zero: Toward the Total Economic Value of Alaska's National Forest Wildlands*. Washington, D.C.: The Wilderness Society

- Garber-Yonts, B., J. Kerkvliet, R. Johnson. 2004. Public Values for Biodiversity Conservation Policies in the Oregon Coast Range. *Forest Science*. 50 (2004) 589-602.
- Pimentel, D., C. Harvey, P. Resosudarmo, K. Sinclair, D. Kurz, M. McNair, S. Crist, L. Shpritz, L. Fitton, R. Saffouri, R. Blair. 1995. Environmental and Economic Costs of Soil Erosion and Conservation Benefits, *Science*, New Series. 267:1117-1123.
- Washington Department of Natural Resources. 2000. Preliminary Economic Analysis: Forest Practices Rule Making Affecting Northern Spotted Owl Conservation. available at <http://www.dnr.wa.gov/forestpractices/rules/activity/owlecon.pdf> (Accessed November 2, 2007).
- Wilson, M., and S. Carpenter. 1999. Economic Valuation of Freshwater Ecosystem Services in the United States: 1971-1997. *Ecological Applications* 9:772-783.

## **VI. Recreation**

TWS is deeply committed to maintaining the ecological integrity of our public Forest Service lands for the sake of the wildlife, watershed, and recreation values that they provide for current and future generations. More and more we are coming to observe and understand that the future of public support for our public lands is reliant on a citizenry that is actively engaged in experiencing these lands. According to the National Visitor Use Monitoring Data for Okanogan and Wenatchee National Forests, the forest generates over \$115 million per year from recreation (2006 data). Therefore, responsible, appropriate, and balanced recreational opportunities are critical assets that must be prioritized on the Okanogan-Wenatchee National Forest through the Forest Plan Revision and other related processes.

The current and future recreation network must be considered in the context of the overall landscape of recreational opportunities. Thus, allowed recreational use should be compatible with the level and need for natural resource protection. This may mean including buffer areas with mixed use recreation on the periphery of more core ecological areas where lower impact recreation is emphasized. The Forest Plan should also consider and coordinate with local and state recreation networks. Road access to recreation facilities and linking trails from multiple jurisdictions should be considered, as well as coordinating the types of trails and recreation use that multiple jurisdictional trails allow.

Further, we are aware that there is an increased need and demand for day hikes to views and the Forest Plan should plan for appropriate expansion of this type of recreational opportunity. In all Forest Planning elements, a balance must be struck to preserve both the tremendous wildlands and world-class recreational assets that the Forests possess.

The recreation component of the Forest Plan Revision must be coordinated closely with the on-going Travel Management Planning (TMP) effort on the forest. The exact nature of this coordination as it currently exists is unclear to us and we look forward to further clarity from the Forest Plan revision team. Further, the emphasis on motorized recreation in the TMP process must be balanced with a process to ensure that other recreationalists (equestrians, hikers, backpackers, campers, hunters, anglers, wildlife viewers, mountain

climbers, mountain bikers, scenic drivers, etc) are afforded opportunities to recreate on the forest as well. Additionally, as the TMP process does not include winter recreation, additional focus must be paid to the spatial distribution and balanced opportunities for winter recreation on the forest.

We realize that this is a complicated process and encourage the Forest Service to take a visionary approach to this critical issue and especially to remember that the Forest Plan Revision offers an opportunity to look at this issue from a proactive perspective that is not burdened by the limitations of the status quo.

## **VII. Legal Responsibilities**

### **A. New Forest Service Planning Regulations are Inadequate and Potentially Illegal**

As you know, the Forest Service recently revised the National Forest Management Act regulations (2008) for the forest planning process. These new regulations are considerably different than the 1982 regulations which resulted in the initial forest plans for the Wenatchee and Okanogan Forest Plans. TWS has serious concerns with the new forest planning regulations and are challenging their legality in federal district court. Our concerns include:

1. Key environmental safeguards for national forests have been removed that have been in place for more than 25 years. Without these safeguards in place, national forests are far more vulnerable to environmentally destructive activities and there is no assurance of citizen involvement in improving forest plans;
2. Rather than planning to ensure the continued existence of wildlife, forest plans will only “establish a framework to provide the characteristics of ecosystem diversity in the plan area” [36 CFR 219.10(b)(1)]. In fact, forest plans will no longer have to specifically address wildlife needs at all unless the Forest Service determines that the “ecosystem diversity” provisions of the plan need to be supplemented for a particular species.
3. The final regulations eliminate the requirement to prepare an environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA) whenever a forest plan is revised or significantly amended;
4. The final NFMA regulations do not require the Forest Service to incorporate scientific evidence and recommendations. The new regulations only require agency officials to “take into account” the best available science [219.11(a)]. The result could be the rejection of critical scientific information and recommendations;
5. The forest plans themselves are viewed as optional and any and all guidelines the plans might contain to protect wildlife or water quality can simply be ignored if desired. This reduces transparency and all citizens’ ability to hold government officials accountable for following National Forest plans in managing our National Forests.

We are requesting a federal district court to invalidate the 2008 regulations and direct the U.S. Forest Service to instead use the forest planning regulations that were issued in 1982 to conduct the forest planning process. Even though we disagree with the validity and legality of the new regulations, we are providing our input to the plan revisions in the hope that the forest plan will incorporate credible stewardship and conservation perspectives.

## **B. Why an Environmental Impact Statement (EIS) is Necessary**

It is not clear what NEPA documentation will accompany the Forest Plans for the Okanogan-Wenatchee National Forest Plan when it is publically released. The Forest Plan Revision Team has indicated the documentation will be one of the following three: Categorical Exclusion, Environmental Assessment, or Environmental Impact Statement (EIS). TWS urges the U.S. Forest Service to prepare an EIS for the following reasons:

1. The law requires it.
  - a. The National Environmental Policy Act of 1969 (NEPA) – NEPA requires the Forest Service to disclose the environmental effects of their proposed actions and alternatives to those actions. If the Forest Service determines the action may have “significant” environmental effects, NEPA requires preparation of an environmental impact statement (EIS).
  - b. The National Forest Management Act of 1976 (NFMA) mandates that “land management plans are prepared in accordance with the National Environmental Policy Act of 1969” and requires considerable public participation in the forest planning process so citizens have opportunities to help set overall management direction for National Forests. The new NFMA rule “does not preclude preparation of an EA or EIS for a land management plan” (73 Fed. Reg. 21482).
2. An EIS will provide additional information, and transparency to the public regarding the decisions involved in the forest planning process. Public participation in National Forest planning can result in greater support from the public in the final plan, as well as better governmental accountability for the long-term management of our natural resources.
3. The current Forest Plans are over 18 years old and severely outdated. Significant demographic and economic changes have happened in the Northwest since then. There is significant new information regarding natural resources on these National Forests, including fish and wildlife species determined by the federal government to be threatened with extinction, and new US Forest Service management direction and regulation that is a substantial change from when the last Forest Plans were adopted.
4. Other National Forests in the Pacific Northwest are doing an EIS for their forest plans. The only other Forest Service planning process underway in USFS Region 6 is occurring on the Malheur, Wallowa-Whitman, and Umatilla National Forests. According to the June 2008 edition of the Blue Mountains Forest Plan Revision

newsletter (Volume 5, Issue 10), based on specific changes to the new planning rule, “The Forests will prepare an Environmental Impact Statement to document the potential effects of the proposed plan and alternatives.” We commend the decision of the Blue Mountain forest planners, and urge the forest planning team for Okanogan-Wenatchee National Forest to also prepare an EIS for the forest plan.

### **C. Wilderness Review is Required Under the New NFMA Regulations**

NFMA requires the USFS to evaluate the lands it manages and to make recommendations for potential additions to the National Wilderness Preservation System. The Forest Service Handbook (FSH) provides guidance and directives on how that evaluation and documentation shall occur. The FSH (72.4) direction is quite comprehensive and specific. It states:

“Document the results of evaluating potential wilderness areas against characteristics of capability, availability, and need. The minimum requirements for this documentation are outlined in section 74. Supplement the contents as necessary to fully evaluate the suitability of a potential wilderness area for preliminary administrative wilderness or wilderness study area recommendation. Ensure that this documentation includes the following:

1. For each area evaluated, comprehensively assess and describe resource trade-offs and consequences associated with nonwilderness options.
2. Consider measures designed to avoid or minimize the impact to or loss of wilderness characteristics.
3. Develop and evaluate wilderness and nonwilderness options.”

Chapter 74 of the FSH details the minimum documentation necessary for the evaluation and includes:

1. overview (name, acres, location, vegetation, topography, etc.)
2. wilderness capability (basic characteristics that make the area appropriate and valuable for wilderness)
3. availability for wilderness (describe other resource potentials)
4. need for wilderness (summarize the factors considered and the process used)
5. effects of recommendations (describe the potential effects of wilderness and nonwilderness recommendations for each potential wilderness area).

The U.S. Forest Service wilderness recommendations will rely on the evaluation and documentation required by the Forest Service Handbook. We urge you to do a thorough and credible evaluation, and to provide that information to the public in an EIS. The EIS should evaluate a reasonable range of alternative wilderness recommendations. We provide further perspective on the specifics of the wilderness recommendation in section VIII below. Please let us know if we can provide information or perspective to help with the evaluation.

#### **D. Cumulative Effects, Connected Actions and the Reasonably Foreseeable Future must be Considered**

Accurate assessments are critical to a comprehensive analysis of the impacts of the proposed action and alternatives. In a document as far reaching as a Forest Plan (and its accompanying environmental impact statement) it is important that the full range of connected actions and reasonably foreseeable future actions be considered and disclosed. We hope that the Forest engages in a comprehensive look at impacts and actions both in and outside the boundaries of the Forest. A full disclosure of cumulative impacts is critical to good analysis under NEPA.

Identifying a comprehensive list of connected and reasonably foreseeable future actions could perhaps form the basis of the next opportunity for public involvement. There may be many connected and reasonably foreseeable future actions critical to future forest management that the Forest may not be aware of that the public could identify. We are particularly concerned with the how the concurrent process of Travel Management Planning will interact with the decisions of the Forest Plan.

#### **VIII. Considerations for developing a USFS wilderness recommendation**

The famous author Wallace Stegner wrote that wilderness is part of the geography of hope. He was saying that wilderness is as important for reminding us of our frontier past and “our human need for exploration, adventure, and discovery as it is for scientific, recreation, spiritual and cultural reasons.”<sup>6</sup> TWS believes that anyone who hikes or visits the wild country of the Okanogan-Wenatchee National Forest will recognize the value, and the need to protect these lands. The landscape is so dramatic and stunning that it impresses all who experience it—whether one is braving the elements by hiking, hunting, camping or skiing, or just driving to the edge of a wilderness and looking at the vistas. The glaciated peaks, the cascading rivers, the lush forests, and the chance of experiencing and encountering a diversity of wildlife species are a legacy that future generations should also experience. Wilderness designation is the strongest protection the federal government can provide to federal lands. Achieving wilderness protection is difficult and only the United States Congress can designate public land as wilderness. The U.S. Forest Service has the responsibility and legal obligation to evaluate the lands it manages in trust for the American people, and make a recommendation as to which federal lands it believes should be included in our Nation’s Wilderness Preservation System.

The Forest Service Handbook, based on the new 2008 Forest Planning regulations, provides the legal guidance and direction for developing wilderness information and recommendations that the Forest Service is required to prepare for the forest plan (see above wilderness review section). TWS urges the Forest Service to prepare information to insure the wilderness recommendations are as thorough and credible as possible by making sure the following information is also considered in the wilderness review.

---

<sup>6</sup> Letter from Wallace Stegner to David E. Pesonen, Wildland Research Center, Agricultural Experiment Station, University of California, Dec. 3, 1960.

## **A. Do not limit the prerogatives of Congress**

The Washington State Wilderness Act of 1984 (P.L. 98-339) mandates that the Forest Service “shall review the wilderness option when the [forest] plans are revised....” The legislative history of the Act indicates that while areas that have been logged and roaded since 1984 are not to be evaluated for potential wilderness, all the remaining roadless areas are to be studied for the wilderness option.

Regardless of the wilderness recommendations in the Forest Plan, only Congress is empowered to designate wilderness areas in accordance with the Wilderness Act. In practice, Congress has often disagreed with agency interpretations, policies, and recommendations that particular lands do not qualify as wilderness.<sup>7</sup> The last time the Forest Service evaluated potential wilderness in Washington State -- during the RARE II process in 1979 -- the agency recommended Wilderness designation for 268,887 acres, Further Planning for 219,012 acres, and Nonwilderness for 2,032,169 acres.<sup>8</sup> However, Congress found the Forest Service recommendations for Washington national forests to be grossly inadequate and instead designated 1,013,930 acres, or nearly four times the amount recommended by the Forest Service.

Given the record of Congress designating far more wilderness than the Forest Service recommended in Washington, the Forest Service should take a much more inclusive approach toward wilderness suitability than it has in the past. The Forest Service must avoid unfairly biasing the wilderness evaluation process by erecting artificial hurdles for areas to be recommended for wilderness designation. The evaluation must not simply become a “process of elimination” that routinely disqualifies areas that do not satisfy the agency’s suitability criteria. Instead, the wilderness evaluation should objectively assess the wilderness values of each area and leave it to Congress to decide which lands it chooses to ultimately designate as wilderness.

---

<sup>7</sup> For example, in the late 1960s the two regional offices of the Forest Service in the eastern half of the country developed the notion that no lands in their regions could qualify as wilderness. This led to Forest Service drafting of an alternative to the Wilderness Act that was, after a very large controversy, repudiated by the Congress with the enactment of the Eastern Wilderness Areas Act of 1975. The root of this problem was an agency “purity theory” of how to interpret the Wilderness Act, including misuse of criteria involving past human impacts, perceived solitude, and outside sights and sounds, among others. Some of these same errors were also reflected in the RARE process (now known as RARE-I) and in subsequent efforts by the agency to correct those errors through an early version of forest planning once the RARE-I process had been found unacceptable by a Federal court. Controversy over those problems in the West led to the enactment of the Endangered American Wilderness Act of 1978, during the consideration of which the Forest Service decided to conduct a new roadless area inventory, RARE-II. This history is recounted in detail by the Forest Service Historian, Dennis M. Roth, in *The Wilderness Movement and the National Forests* (College Station TX: Intaglio Press, 1988) and summarized from another perspective by Douglas W. Scott, in *A Wilderness-Forever Future: A Short History of the National Wilderness Preservation System*, Campaign for America’s Wilderness, 2001, available at [www.leaveitwild.org/reports](http://www.leaveitwild.org/reports).

<sup>8</sup> USDA Forest Service, RARE II Final Environmental Statement, January 1979, p.S-1.

## **B. Consider the Multiple Values and Uses of Wilderness Designation**

1. **Ecosystem services** – Wilderness areas provide clean water, clean air, wildlife habitat, and scenic beauty for those viewing them from inside or outside their boundaries. The prevalence of the municipal water sources for communities adjacent to the Okanogan-Wenatchee National Forest that rely on the integrity of watersheds within the forest clearly demonstrates one of many ecosystem services provided by these lands.
2. **Recreation value** – The ability to hunt, fish, hike, camp, ski, climb, horseback ride, and paddle in wilderness is highly valuable to a diverse population.
3. **Opportunities for Solitude** – Wilderness offers opportunities for self-reflection, relaxation, and a return to a simpler existence that is not found in other land allocations and that is of enormous value to individuals and our society as a whole.
4. **Scientific Rationale: Wilderness as Benchmark** – There are many widely accepted and well-supported ecological benefits of public land managed as wilderness. A network of large wilderness areas can act as a critical reservoir of biodiversity and naturally evolving ecosystems. Wilderness serves as a control or baseline against which we can measure change in both managed and unmanaged landscapes. It provides a standard of what a healthy, intact ecosystem looks like and how it functions in a relatively unmodified state. The less an ecosystem is disturbed by human activities, the more complex, more diverse, and more valuable it is as a benchmark or a reference point.
5. **Research Natural Areas** – These areas are specifically identified as having high scientific value that can be maintained through wilderness protection.
6. **Structural Diversity** – Many important structural features like large trees, snags, and downed woody debris, much of which is removed by logging, are best developed in unmanaged forests. The structural complexity found in wild, unlogged forests creates a wide range of niches in which many species, including early successional ones, can find appropriate and often the highest quality habitat. Natural disturbance processes maintain native biodiversity, preserve the full spectrum of natural communities, and sustain a mosaic of habitat patches in different stages of recovery from natural disturbance events.
7. **Wildlife Benefits** – Large tracts of unmanaged forests provide optimum habitat for species that are sensitive to human presence, such as nesting raptors or large carnivores, species which may roam widely to find food and mates such as bears and wolverines, and species that depend on interior or mature forest habitat such as pine martens and many neo-tropical migratory birds. The animals and

plants found in unmanaged forests may also serve as source populations for surrounding managed forests following human disturbance. Additionally, viable movement corridors between core habitats are necessary to maintain the long-term viability of plant and wildlife populations. Importantly, lower elevations are often of high value for plant and animal life. As the vast majority of current wilderness on the forest is above 3,500 feet, the remaining intact lower elevation lands will add incredible value to the current wilderness system.

8. **Ecosystem Resiliency** – With the increased uncertainty of future climate suitability scenarios, large, intact, and connected ecosystems offer the best chance for resiliency and adaptation to survive new conditions. In the Okanogan-Wenatchee National Forest this value is clearly demonstrated by the ability of intact lands to withstand extreme flood events, whereas roaded and otherwise developed lands are challenged by these same events. Likewise, forests that are in within the historic range of variability in terms of the amount and distribution of fuels are more adept at withstanding natural fire regimes than those that have a history of fire suppression that has increased the fire risk.
9. **Legacy value** – Knowing that future generations will have wilderness areas is very important to Americans, who feel this is one important way that we are fulfilling our generation’s duty to pass on the American heritage to the future.
10. **Existence value** – Simply knowing that wilderness areas still exist, with no expectation of ever themselves visiting these lands.

**C. Do not exclude areas based on activities that are permitted uses in wilderness.**

1. Hunting
2. Grazing
3. Wildlife Habitat Management
4. Fire Fighting
5. Recreation Use
6. Fuels Reduction
7. Trail Maintenance
8. Rock Climbing
9. Prevalence of insects or disease

Because of the increasing public concern over uncharacteristic fires on the Forest as a result of nearly a century of fire suppression, it is important to point out that necessary fuels reduction is possible in wilderness areas.

First, there should be a clear prioritization of fuels reduction based on the Wildland Urban Interface (WUI) that The Wilderness Society defines as a quarter

mile buffer from habitable structures. Natural processes should remain the driving management force within the interior of wilderness areas.

Second, the draft wilderness evaluations that we have reviewed include numerous references to the Healthy Forest Restoration Act (HFRA)'s inability to conduct fuels reduction logging in wilderness areas. Importantly, HFRA is not the only way to accomplish fuels reduction. Wildland Fire Use and prescribed fire should be the first tools employed when fuels reduction is necessary in wilderness areas. In fact, Wildland Fire Use is a much less expensive tool to accomplish fuels reduction. For example, a 2004 lightning strike fire in a mixed conifer habitat in the Sierra National Forest was managed to accomplish nearly 3,500 acres of fuels reduction at a cost of just over \$150 per acre as opposed to the \$900 per acre cost of mechanical fuels reduction work (Broder-Beck Fire, Rob Griffith, U.S. Forest Service Region 5 Assistant Director of Fuels, personal communication August 2008).

**D. Do not exclude areas based on “sights and sounds” from nearby human developments.**

**IX. Wild and Scenic Rivers Evaluation**

We reiterate our request for a full evaluation of potential Wild and Scenic Rivers recommendation for rivers in the Okanogan-Wenatchee Forest as part of the Forest Plan revision that are documented in our March 28, 2007 letter to then-supervisor Jim Boynton. This letter also follows up on a December 11, 2006 letter from our colleagues. Your May 21, 2007 response indicates that the following rivers/reaches will be evaluated through the Forest Plan revision process:

Little Wenatchee River  
North Fork of the Entiat River  
Mad River  
Cooper River (tributary to the Cle Elum River)  
Silver Creek (tributary to the Yakima River)  
Teaway River – West, Middle and North Forks; Stafford and Bear Creeks  
Naches River (confluence with Little Naches/Bumping River to NF boundary)  
Little Naches River (including Middle Fork)  
Bumping River  
Tieton River, including South and North Forks  
Rattlesnake Creek  
American River, Rainier Fork  
Nason Creek – Raging and Rock Creeks – tributaries to the Chiwawa River

In the analysis, the recreational and habitat values of these rivers must be considered not only in isolation, but on a Forest-wide, regional and national scale. It does not make sense to preclude protections for these rivers because of the good fortune of this geographic region having many rivers with outstandingly remarkable values. If there are

world-class river values, but none are protected, then the biological, social, and economic values of the rivers overall are at risk. These low-elevation river corridors should also be recognized in terms of their unique and under-represented habitat type as well as their ability to connect currently protected lands on the forest to maintain resiliency and the potential for species and habitat conditions to move in response to shifting resource availabilities (food, shelter, mates, etc) and global warming.

## **X. Okanogan-Wenatchee Wilderness Evaluation—the PAC process**

We commend the Forest Service for the excellent work and involvement of the public during the Roadless Inventory identification process on the Forest. This process exemplifies the public involvement necessary for a quality outcome.

The Wilderness Society was involved as an observer and an alternate participant in the Provincial Advisory Committee (PAC) process to evaluate the wilderness suitability on the Okanogan-Wenatchee National Forest. Overall, we appreciated that the process attempted to elicit thoughtful evaluation of a large amount of material. The breakout groups were well-balanced in terms of representation and, for the most part, they produced quality and constructive discussions amongst participants. The outcome, as reported in the August 2007 Progress Report, demonstrates a broadly held and strong desire to protect the wilderness character of the lands considered. This is demonstrated by the overwhelming majority of the units (all but one) considered falling into category #1 (recommended for wilderness), #2 (might support for wilderness) or #4 (manage to maintain roadless character).

We do, however, have significant concerns with the amount of credence given to the work of the PAC. First, the PAC is a hand-selected, Forest Service-convened body of highly involved individuals, almost entirely comprised of individuals that live in communities adjacent to the National Forest. While this is an important demographic to include, it is also critical to remember that the National Forest is owned by all American citizens and that the perspectives of a broader public audience must also be considered by the Forest Service in determining the long-term management of these lands. As such, the Forest Service still needs to reach out to citizens and organizations that care about wilderness on the Okanogan-Wenatchee, but who were not involved in the PAC meetings.

Beyond this, the PAC process itself has the following inadequacies.

### **A. Not all IRAs were evaluated**

Only 22 of the 35 Inventoried Roadless Areas (IRAs) were considered by the PAC. Because of time constraints, the PAC only discussed the IRAs that the Forest Service had already identified as “high capability.” Thus, there was no consideration of the capability of the remaining 13 IRAs, nor was there discussion regarding their suitability, need, or overall recommendation. This omission of IRAs should not reflect on the relative

consideration and ultimate recommendation and/or management decision regarding these lands in the Forest Plan revision.

### **B. The evaluation tool was skewed towards exclusion**

As discussed in our January 16, 2007 comment letter, we have significant concerns with the construction of the matrix tool that the PAC created and used to discuss the wilderness evaluations. This tool encourages exclusion of IRAs for consideration of wilderness based on the mere existence of real or perceived incompatible uses which may or may not have undergone review required by the National Environmental Policy Act (including user-created recreation routes). We have repeatedly argued that these criteria must take into account the quality of the uses and issues regarding their importance to various constituencies to allow a true consideration of the trade-offs between prohibiting the ability of Congress to protect those lands with wilderness designation and allowing limited non-compatible use. Additionally, several of the criteria detailed in the matrices deal with uses that are compatible with the definition of the Wilderness Act (see list above regarding specific management exclusions) and it is inappropriate for the Forest Service to use or to direct the public to use them in order to exclude lands from being considered for wilderness. The result of the tool was that even areas with extremely compelling suitability and need for wilderness (especially in terms of wildlife habitat) were not recommended for wilderness because of the presence of one or two of the activities that the matrix identified as lowering the capability or need.

While we understand that the matrix was a tool designed to reduce the conflict and bring objectivity to the PAC discussions, the result is that there was not a comprehensive discussion of the value of wilderness in these areas and a tough look at the trade-offs that designation or lack of designation would entail. This leaves the difficult decision to the Plan Revision Team and the Forest Supervisor. Clearly the Forest Service cannot employ the same exclusionary decision-making tool that the PAC created. The wilderness values held by the Potential Wilderness Areas must be considered and weighed against the current incompatible activities based on quality, quantity, and the existing or potentially expanded opportunities for such activities in more appropriate locations on the forest.

### **C. Decisions were made without key information**

Recommendations at the breakout group level (that then filtered up to the large group stage as discussed below) were made quickly with varying levels of information. At minimum, all groups had the draft evaluations written by the Plan Revision team. However, that does not mean that every individual read every write-up and evaluated it critically. Additionally, anecdotal evidence was used to influence the decisions at the breakout session level. For example, in the breakout session considering Long Swamp Proposed Wilderness Area, there was mention of a snowmobile trails that bisect the area throughout. Even though no maps or concrete evidence of these trails was available, the group chose to allow this claim to flavor their eventual decision.

#### **D. Breakout structure led to less informed and more ideological discussion at the large group stage**

The breakout structure did allow in-depth discussion and information sharing on the individual Proposed Wilderness Areas. This was constructive. However, because each group considered only a subset of the total 22 areas, the discussion at the large group stage tended to be more ideological than factual in nature. Either people just accepted the decision of the breakout group due to lack of conflicting information or they would oppose them based on some compelling personal belief or experience. The result is displayed in the final recommendation chart where the majority of the Potential Wilderness Areas were assigned to the 4<sup>th</sup> category of no designation, but maintenance of the roadless character and with many less being recommended for wilderness (category #1). This limitation must be considered as the Forest Plan Revision team determines how to interpret the work of the PAC.

#### **XI. Specific Comments on the Draft Wilderness Evaluations**

Please note that these comments represent some initial feedback on the draft wilderness evaluations, but we reserve the option of providing a more detailed analysis in the future.

1. We have received a copy of the draft August 2008 wilderness evaluations. Unlike the evaluations for the Colville National Forest, whose Forest Plan Revision is linked to the Okanogan-Wenatchee, the drafts were not available on-line. The public had to know that they existed in order to request them. We request that the drafts be announced publically and be accessible to the public on the internet.
2. The wilderness evaluations do not include critical analyses required by the Forest Service Handbook. As we cited above, FSH 72.4 requires that the evaluation include:
  1. a comprehensive assessment and description of resource trade-offs and consequences associated with nonwilderness options
  2. a consideration of measures designed to avoid or minimize the impact of loss of wilderness characteristics
  3. an evaluation of the wilderness and nonwilderness options

None of these are actually fully addressed in the drafts as we read them. Particularly lacking is the fifth component required under Chapter 74 of the FSH – “effects of recommendations.” This section is conspicuously lacking in all the wilderness evaluation drafts and must be completed.

3. The increased demand for incompatible recreation should not be discussed in the needs section. Instead, it should be discussed in the availability section and should include the context of how many acres/miles of trails and percent of the forest that is open to those areas currently and that would be closed by individual and cumulative Proposed Wilderness Areas. The mention of the impact of

increased ORV use on the need for wilderness is, however, appropriate in the needs section.

4. The focus on suitability for timber should be balanced with a report of how much of that land is available for timber harvest under current management.
5. The reporting of snowmobile trails must be augmented to include the amount of acres open to snowmobiles due to the legality of snowmobiles riding off-trail. Otherwise, it is impossible to gauge the current opportunities available to this recreation constituency and the resultant trade-offs associated with management actions that may change those opportunities.

## **XII. Conclusion**

Again, we look forward to continued engagement with the Forest Revision Team on these issues as the Forest Plan Revision moves forward. Please direct any questions to me at 206-624-6430 x 293 or [jchelminiak@twsnw.org](mailto:jchelminiak@twsnw.org).

Sincerely,



John Chelminiak  
Director, North Cascades Initiative

Cc: Mary Wagner, Regional Forester, Region 6  
Susan Sater, Wilderness, Region 6  
Becki Heath, Forest Supervisor, Okanogan-Wenatchee National Forest  
Debbie Kelly, Public Affairs Specialist, Okanogan-Wenatchee Forest Plan Revision