



**File Code:** 2320

**Date:** May 11, 2020

**Subject:** Untrammelled Quality and Tracking Agency Management Actions within Wilderness Areas of the Flathead, Helena-Lewis and Clark, and Lolo National Forests

**To:** All Flathead, Helena-Lewis and Clark, and Lolo National Forests Employees

The wilderness resources of the Flathead, Helena-Lewis and Clark, and Lolo National Forests are vast, wide ranging, and valuable. This letter is to express the value of the "untrammelled" quality of wilderness, which the Wilderness Act mandates, and set expectations for all programs regarding the need to annually report and track administrative management actions which may have a trammeling effect within the Bob Marshall Wilderness Complex (BMWC), Gates of the Mountains, Mission Mountains, Rattlesnake, and Welcome Creek Wilderness Areas. This letter will satisfy the requirements of the Wilderness Stewardship Performance (WSP) Element: Agency Management Actions (AMA), 2-point level, and sets a path for accomplishing the 4-, 6-, and 8-point levels. Please reference the WSP Guidebook for technical information.

"Untrammelled," one of the qualities of wilderness and a facet of wilderness character, is a key requirement of the Wilderness Act. It is the fundamental goal of wilderness stewardship; that ecosystems are essentially unhindered and free from modern human control or manipulation. To preserve the untrammelled quality of wilderness, managers need to exercise restraint when authorizing actions that manipulate any aspect of the wilderness. Forest Service manual direction (FSM 2320) provides direction to National Forests to manage wilderness to ensure that human influence does not impede the free play of natural forces or interfere with natural successions in the ecosystems. It is important to remember that only Line Officers with the appropriate delegation of authority may approve/authorize trammeling actions in Wilderness (FSM 2323.04).

A "trammeling" action is defined as a human endeavor that intentionally controls or manipulates the land; or any management action that intentionally manipulates controls, hinders, or restricts any aspect of the ecosystem. Examples of agency authorized trammeling actions in wilderness include, but are not limited to, fire suppression; invasive species management; vegetation management; certain fish, wildlife, cave, cultural/historical, range, and recreation/trail resource management/monitoring activities; research/scientific activities; and some emergency/search and rescue activities, no matter if these activities do or do not involve any motorized equipment-mechanized transport elements. Trammeling actions such as those listed above may also be approved activities conducted by agency personnel or partners, or authorized activities for special use permit holders and cooperators. If you are uncertain whether an activity may be considered a trammeling action, contact your local wilderness manager for a determination.

Each time a decision is made to take management action, we need to recognize the basic tenet that wilderness should be wild. In general, agency authorized actions which trammel should be avoided or minimized as an essential principle of wilderness stewardship, and as required by the Wilderness Act, unless it can be shown that these actions are necessary to preserve wilderness character as a whole. Non-emergency activities should be evaluated in accordance with forest policies, such as



through a Minimum Requirements Analysis, or the Framework for Evaluation of Proposals for Research and Scientific Activities, in addition to appropriate NEPA analysis.

Trammeling actions occurring in these national forests which cannot be avoided shall be annually reported and tracked to facilitate trend analysis by wilderness managers. Agency authorized trammeling trends and their implications will be annually presented to leadership of the appropriate forests to inform future wilderness management decisions. Annual trends shall be reported to the regional wilderness program manager each fiscal year. It is important that we track and monitor agency authorized trammeling actions in our wilderness areas to ensure management actions that manipulate wilderness do not unnecessarily result in the degradation of wilderness character, as required by the Wilderness Act. To this end, the following shall be implemented:


“Key personnel” for tracking trammeling actions are:


- Bob Marshall – Ian Bardwell (Rocky Mountain), Rich Owens (Spotted Bear)
- Great Bear – Colter Pence (Hungry Horse), Rich Owens (Spotted Bear)
- Scapegoat – Ian Bardwell (Rocky Mountain), Josh Lattin (Lincoln), Matt Walter (Seeley Lake)
- Gates of the Mountains – Rory Glueckert
- Mission Mountains – Beth Pargman
- Rattlesnake and Welcome Creek – Katie Knotek

In order to effectively monitor and track a proposed non-emergency trammeling action, all forest resource staff conducting or facilitating an authorization/approval of a potentially trammeling action, including staff evaluating a special use permit, or working on behalf of a partner or cooperator to seek authorization, shall annually meet or conference with all relevant designated key personnel to review the proposed trammeling action before it occurs. All staff shall follow up by October 1<sup>st</sup> with key personnel, providing updated information. Emergency trammeling actions authorizing officers shall notify and provide information as soon as practical to relevant designated key personnel. This will satisfy the WSP AMA element 4-point level.

Information for all trammeling actions which needs to be provided will include: type of activity, geographic location, reason for the activity, all authorizing and evaluation documents, and relevant dates. This will satisfy the WSP AMA element 6-point level. District and forest wilderness staff for all of the wilderness areas on a forest are responsible for annually coordinating among themselves to compile information to be presented to the relevant forest’s leadership teams, and reporting to the regional program manager, in conformance with the WSP AMA element 8-point level.

Wilderness stewardship is a privilege and responsibility our whole agency shares. Thank you for your hard work and upholding our responsibilities in stewarding of our wilderness resources.

  
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