

### **Suggestions for a Strong Forest Supervisor Untrammelled Quality Letter**

- Strong letters do two things:
  - Directly define the untrammelled quality and speak to its importance,
  - Establish an obvious plan/intention for tracking, filing, and evaluating agency trammeling actions.
- Letters should identify the person responsible for maintaining and keeping records, as well as fiscal year due dates for staff reporting.
- Do not confuse trammeling actions with Motor/mech authorization. Motor/mech can be referred to, but that could cause confusion. Be clear on why Motor/mech is being invoked if choosing to do that, so there is no confusion between trammeling actions and Motor/mech authorizations.
- Some forest's letters have established a policy of mandatory MRA/MRDGs for all potential trammeling actions. Making MRA/MRDGs mandatory is not necessarily the intended outcome of this letter/element.
- Most common problems with letters:
  - Poor/limited definition of untrammelled
  - Using trammeling examples rather than emphasizing untrammelled as a desired quality
  - Unclear or no system for filing and tracking
  - Did not identify who is responsible for maintaining and keeping records, as well as fiscal year due dates for staff reporting
- The following letters serve as good examples.
  - Stanislaus, Mt Hood, Ottawa, Tongass NFs letters

**File Code:** 2320**Date:** June 21, 2019**Route To:****Subject:** Trammeling**To:** All Employees

As Forest Service staff each of us shares responsibility for preserving wilderness character for current and future generations through the Wilderness Act. Understanding wilderness character and monitoring how it changes over time will provides valuable information to help comply with the law, fulfill agency policy, and improve wilderness stewardship. The first step is understanding the qualities that make up wilderness character:

- *Untrammeled* - Wilderness is essentially unhindered and free from modern human control or manipulation.
- *Natural* - Wilderness ecological systems are substantially free from the effects of modern civilization.
- *Undeveloped* - Wilderness is degraded by the presence of structures, installations, habitations, and by the use of motor vehicles, motorized equipment, or mechanical transport that increases people's ability to occupy or modify the environment.
- *Opportunities for Solitude or Primitive and Unconfined Recreation* - Wilderness should allow the opportunity for people to experience solitude and primitive and unconfined recreation.

Of these qualities, the most likely to be degraded by Federal land managers as they administer wilderness is the untrammeled quality. A trammeling action is defined as any management action that intentionally manipulates, controls, hinders, or restricts any aspect of the ecosystem. Managers must exercise restraint when deciding whether or not to authorize actions that manipulate any aspect of the wilderness. In general, actions that trammel should be avoided unless it can be shown that these actions are necessary to maintain or improve wilderness character as a whole. Of equal importance, every trammeling action we take must be tracked and reported. These include common activities such as invasive species treatments and fire suppression. Even though these activities may be done to enhance resource conditions, and may be done using traditional tools, they are still actions that trammel the unhindered state of wilderness. We need to ask ourselves "are these trammeling actions really necessary?" If so, we need to track these actions to determine any trends within each wilderness and across all wilderness.



Monitoring and tracking trammeling actions in our wilderness areas is extremely important to ensure that management actions do not result in the degradation of wilderness character. In order to effectively monitor and track trammeling actions, I propose the following in our three wilderness areas:

### *All Staff*

1. Identify and assemble information regarding how we will track these activities. I anticipate a multi-forest, interdisciplinary discussion of what we are doing in the Carson-Iceberg, and Mokelumne that could result in trammeling since these wilderness areas cross forest boundaries. Each forest will ensure appropriate staff is on hand for those meetings. Anticipated resource staff may include fire, botany, aquatics and wildlife, special uses, and heritage program staff. The Emigrant Wilderness will require a forest-wide discussion of activities with a similar variety of staff to determine what actions could result in trammeling.
2. Arrange motorized/mechanical use documentation protocols with the forest wilderness manager to be used for national reporting. Ensure all administrative use of such equipment in wilderness is recorded with the date and location. Equipment requiring authorization include (but are not limited to): aircraft, motorboats, water pumps, chain saws, drones, wheelbarrows, generators, motorized winches, snowmobiles, explosives, bicycles, ATVs, and all other motorized or mechanized equipment.
3. Ensure all law enforcement activities within wilderness are recorded with the date and location.
4. An end-of-season report from program specialists will be submitted to the wilderness manager for national reporting.
5. Conduct a Minimum Requirements Analysis (MRA) when uses prohibited under Section 4(c) of the Wilderness Act are being considered for a project in wilderness (or whenever an administrative action may degrade wilderness character, whether or not a prohibited use is considered). Prohibited uses include: construction of temporary roads; operation of motor vehicles, motorized equipment or motorboats; landing of aircraft; mechanical transport; and construction of structures or installations. An MRA is used to determine that an administrative action is necessary in wilderness and the selection of the minimum method or tool to be used is made within the constraints of law and agency policy. This is in addition to any NEPA required. Contact the forest wilderness manager for templates and example MRAs.

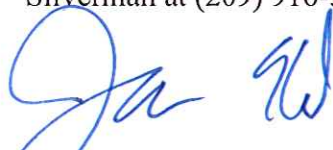
### *Key Staff Meeting*

1. The Forest Leadership Team will determine the key forest personnel who will track trammeling actions, after considering recommendations from the forest wilderness manager. The Forest wilderness manager will hold a meeting with these key forest personnel this fiscal

year in order to answer questions about trammeling actions and identify each person's role in tracking these actions.

As a WSP standard, the trends in trammeling actions will be assessed and presented to me annually. These trends will be evaluated to ensure that wilderness character is being protected and that we continue to play our part in wilderness stewardship. I appreciate your efforts in working with the forest wilderness manager, forest and district public service staff officers, and other appropriate personnel in coordinating projects that occur within wilderness and in reporting the trammeling actions resulting from management activities. Early coordination with wilderness and public services staff on NEPA projects involving MRAs and annual reporting will help maintain consistency and contribute to effective wilderness stewardship.

If you need to coordinate activities within the Emigrant, Carson-Iceberg, or Mokelumne Wilderness Areas or have any further questions, please contact Forest Wilderness Manager Joel Silverman at (209) 916-5137 or [joel.silverman@usda.gov](mailto:joel.silverman@usda.gov).



JASON KUIKEN  
Forest Supervisor



**File Code:** 2320

**Date:** September 23, 2019

**Route To:**

**Subject:** Wilderness Trammeling Actions

**To:** All Employees

The Wilderness Act of 1964 mandates that wilderness areas “shall be administered...so as to provide protection of these areas, the preservation of wilderness character (Public Law 88-577).” Wilderness Stewardship Performance (WSP) is the performance measure we use in effectively measuring how well we are meeting our primary responsibility under the Wilderness Act—which is to preserve wilderness character. Additionally, focusing on wilderness character and monitoring how it changes over time will provide concrete information to help wilderness program managers comply with law, fulfill agency policy, and improve wilderness stewardship. It is the duty and responsibility of all forest staff to protect the qualities that make up wilderness character:

- *Untrammelled.* Wilderness is essentially unhindered and free from modern human control or manipulation.
- *Natural.* Wilderness ecological systems are substantially free from the effects of modern civilization.
- *Undeveloped.* This quality is degraded by the presence of structures, installations, habitations, and by the use of motor vehicles, motorized equipment, or mechanical transport that increases people’s ability to occupy or modify the environment.
- *Opportunities for Solitude or Primitive and Unconfined Recreation.* This quality is about the opportunity for people to experience wildness.

A fundamental goal of wilderness stewardship is to ensure that wilderness character is preserved by managing wilderness areas as ecosystems that are essentially unhindered and free from modern human control or manipulation, or untrammelled by man. To preserve the Untrammelled Quality of wilderness, managers need to exercise restraint when authorizing actions that manipulate any aspect of the wilderness—in general actions that trammel should be avoided as an essential principle of wilderness stewardship unless it can be shown that these actions are necessary to preserve wilderness character as a whole. A trammeling action is identified as a human endeavor that intentionally controls or manipulates the land’s self-will; any management action that intentionally manipulates, controls, hinders, or restricts any aspect of the ecosystem.

Monitoring and tracking trammeling actions in our wilderness areas is exceedingly important to ensure that management actions that manipulate wilderness do not result in the degradation of wilderness character. In order to effectively monitor and track trammeling actions, all managers will be directed to apply the following:

1. Notify and/or coordinate with the Recreation Program Manager, Jim Sobrack, when





conducting activities within the Sylvania, McCormick, and Sturgeon River Gorge Wilderness Areas.

2. Ensure all authorized use of equipment used in wilderness is recorded with date and location. These authorizations include: fixed wing, helicopter, motorboat, water pump, chainsaw, wheelbarrow, generator, motorized winch, snowmobile, and ATV, etc.
3. Submit motorized/mechanized use information to Randi Ellsworth, Recreation Planner, for reporting. Record use as it occurs to prevent loss of information.
4. Ensure all law enforcement activities within wilderness are recorded with date and location.
5. Conduct a Minimum Requirements Analysis (MRA) when uses prohibited under Section 4(c) of the Wilderness Act are being considered for a project in wilderness or whenever an administrative action may degrade wilderness character, whether a prohibited use is considered or not. Those prohibited uses include: temporary roads, motor vehicles, motorized equipment or motorboats, landing of aircraft, mechanical transport, and structures or installations. The Minimum Requirements Decision Guide (MRDG) is a tool that can be used to determine that an administrative action is necessary in wilderness and the selection of the minimum method or tool to be used is made within the constraints of law and agency policy. All MRAs should be coordinated with Forest wilderness staff.

As a Wilderness Stewardship Performance standard, the trends in motorized equipment and mechanical transport use, emergency authorizations, law enforcement activities, and other actions will be assessed and presented to me annually for the purpose of evaluation trammeling actions to ensure that wilderness character is being protected and that we continue to play our part in wilderness stewardship. I appreciate your efforts in working with Forest wilderness managers and other appropriate disciplines in coordinating projects within wilderness and reporting trammeling actions resulting from management activities. Early coordination with wilderness staff on NEPA projects involving Minimum Requirements Analysis and annual reporting will help maintain consistency in making stronger decisions and contribute to effective wilderness management.

If you need to coordinate activities inside the Ottawa's wilderness areas or have any further questions, please contact Jim Sobrack at 906-285-6912.



*for* LINDA L JACKSON  
Forest Supervisor

**File Code:** 2320  
**Route To:****Date:** September 4, 2019**Subject:** Reporting and Tracking Agency Management Actions in Wilderness**To:** All Tongass National Forest Employees

This letter reemphasizes the expectations for all programs on the Tongass National Forest regarding wilderness stewardship work, the tracking of agency management actions within our wilderness areas and the mandatory use of the Minimum Requirements Analysis (MRA). Wilderness stewardship cannot be successfully achieved solely by our wilderness program staff but is instead a privilege and responsibility that our whole agency shares. To that end it is each and every program areas' responsibility to understand the importance of the untrammeled quality of wilderness character and what it means to all agency management actions. "Untrammeled" is the fundamental goal of wilderness stewardship that ecosystems are essentially unhindered and free from modern human control or manipulation. A "trammeling action" is defined as: A human endeavor that intentionally controls or manipulates the land's self-will; any management action that intentionally manipulates, controls, hinders, or restricts any aspect of the ecosystem.

It is my expectation that agency management actions in wilderness be fully vetted through a MRA process prior to committing staff time and resources. Keep in mind that the MRA is a two-step analysis used to determine if an administrative action is even necessary to do in wilderness and, if so, the minimum means of accomplishing the objective. Using the MRA process will enable the forest to track managerial restraint in the forest's wilderness areas. This is a critical step in order to fulfill our requirements under the Act to protect the untrammeled quality of wilderness character.

Following the determination of the District Ranger that a management action within wilderness is a priority, coordinate with your district wilderness staff to complete the MRA. The Minimum Requirements Decision Guide (MRDG) is a tool that can be used to guide you through the MRA process. District wilderness staff are encouraged to coordinate with the forest wilderness program manager. The forest wilderness program manager will work with the district wilderness staff and the regional wilderness program manager to prepare a submittal to the Region for any actions that require Regional Forester's approval.

In order to properly track the MRAs completed each year, I request copies of MRAs/MRDGs completed throughout the year be submitted to the forest wilderness program manager annually by December 31<sup>st</sup>.

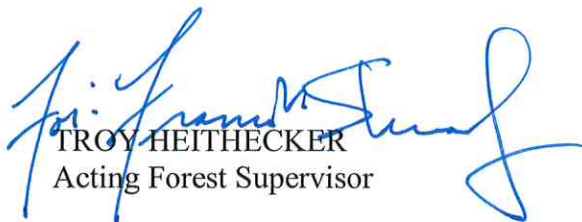
It is also important that we monitor and track trammeling actions in our wilderness areas to ensure management actions that manipulate wilderness do not result in the degradation of wilderness character. In order to accomplish this, all managers are directed to:



1. Notify and/or coordinate with district wilderness staff and/or forest wilderness program manager when conducting activities within any of the Tongass Wilderness Areas. Program specialists will annually post to the Agency Management Actions Tracker on the Tongass Recreation SharePoint Site all activities conducted within designated wilderness areas by December 31<sup>st</sup>.
2. Ensure all authorized use of equipment in wilderness is recorded with the date and location. Annually submit motorized/mechanized use information to district wilderness staff for national reporting by September 30<sup>th</sup>. Record use as it occurs to prevent loss of information. Authorized use of equipment includes (but not limited to): aircraft, motorboats, water pumps, chain saws, wheelbarrows, generators, motorized winches, snowmobiles, explosives, bicycles, ATVs, and all other motorized or mechanized equipment that has been approved through an MRA. Some uses of motorized equipment within the Tongass wilderness areas are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and will not require an MRA/MRDG. District wilderness staff and the forest wilderness program manager will assist you in determining which uses must be authorized.
3. Ensure all law enforcement activities, including search and rescue, within wilderness are recorded with the date and location. Annually submit information to district wilderness staff for national reporting by September 30<sup>th</sup>. Record use as it occurs to prevent loss of information.

As a Wilderness Stewardship Performance standard, the trends in motorized equipment and mechanical transport use, emergency authorizations, law enforcement activities and other actions will be assessed and presented to me annually for the purpose of evaluating trammeling actions to ensure that wilderness character is being protected and that we continue to play our part in wilderness stewardship. I appreciate your efforts in working with district and forest wilderness staff and other appropriate disciplines in coordinating projects within wilderness and reporting trammeling actions resulting from management activities. Early coordination with wilderness staff on MRA's and annual reporting will help maintain consistency in making stronger decisions and contribute to effective wilderness management.

Thank you for your continued good work and upholding our responsibility in future stewarding of our wilderness resources.



TROY HEITHECKER  
Acting Forest Supervisor



**File Code:** 2320**Date:** September 27, 2018**Subject:** Wilderness Trammeling Actions**To:** Mount Hood National Forest Staff & District Rangers

The Wilderness Act of 1964 mandates that wilderness areas “shall be administered...so as to provide protection of these areas, the preservation of wilderness character...” (Public Law 88-577). The new performance measure, Wilderness Stewardship Performance (WSP), represents the next phase in effectively measuring how well we are meeting our primary responsibility under the Wilderness Act—which is to preserve wilderness character. Additionally, focusing on wilderness character and monitoring how it changes over time will provide concrete information to help wilderness program managers comply with law, fulfill agency policy, and improve wilderness stewardship. It is the duty and responsibility of all forest staff to protect the qualities that make up wilderness character:

- *Untrammelled* - Wilderness is essentially unhindered and free from modern human control or manipulation.
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- *Opportunities for Solitude or Primitive and Unconfined Recreation* - This quality is about the opportunity for people to experience wilderness.

A fundamental goal of wilderness stewardship is to ensure that wilderness character is preserved by managing wilderness areas as ecosystems that are essentially unhindered and free from modern human control or manipulation, or untrammelled by man. To preserve the Untrammelled Quality of wilderness, managers need to exercise restraint when authorizing actions that manipulate any aspect of the wilderness—in general actions that trammel should be avoided as an essential principle of wilderness stewardship unless it can be shown that these actions are necessary to preserve wilderness character as a whole. A trammeling actions is defined as a human endeavor that intentionally controls or manipulates the land’s self-will; any management action that intentionally manipulates controls, hinders, or restricts any aspect of the ecosystem.

Monitoring and tracking trammeling actions in our wilderness areas is exceedingly important to ensure that management actions that manipulate wilderness do not result in the degradation of wilderness character. In order to effectively monitor and track trammeling actions, all managers will be directed to apply the following:

1. Notify and/or coordinate with district recreation managers and the forest recreation program manager when conducting activities within a Wilderness Area.



2. Ensure all authorized use of equipment used in wilderness is recorded with date and location. These authorizations include: fixed wing, helicopter, air tanker, motorboat, water pump, chain saw, wheelbarrow, generator, motorized winch, snowmobile, explosives, and ATV, etc.
3. Submit motorized/mechanized use information to District data stewards or wilderness managers for national reporting. Record use as it occurs to prevent loss of information.
4. Ensure all law enforcement and search and rescue activities within wilderness are recorded with date and location.
5. Conduct a Minimum Requirements Analysis (MRA) when uses prohibited under Section 4(c) of the Wilderness Act are being considered for a project in wilderness or whenever an administrative action may degrade wilderness character, whether a prohibited use is considered or not. Those prohibited uses include temporary roads; motor vehicles, motorized equipment or motorboats; landing of aircraft; mechanical transport; and structures or installations. The Minimum Requirements Decision Guide (MRDG) is a tool that can be used to determine that an administrative action is necessary in wilderness and the selection of the minimum method or tool to be used is made within the constraints of law and agency policy. I request that all signed MRDGs will be kept in the following Pinyon location: Recreation-2300, 2320-Wilderness, 2015-2025 Wx Monitoring, !MRDGs: <https://usfs.box.com/s/97o4t7lq5iu0coz4dd8spj1t4o48yl3m>

As a Wilderness Stewardship Performance standard, the trends in motorized equipment and mechanical transport use, emergency authorizations, law enforcement activities, and other actions will be assessed and presented to me annually for the purpose of evaluating trammeling actions to ensure that wilderness character is being protected and that we continue to play our part in wilderness stewardship. I appreciate your efforts in working with district wilderness managers, forest public services staff, and other appropriate disciplines in coordinating projects within wilderness and reporting trammeling actions resulting from management activities. Early coordination with wilderness and public services staff on NEPA projects involving Minimum Requirements Analysis and annual reporting will help maintain consistency in making stronger decisions and contribute to effective wilderness management.

If you need to coordinate activities inside Mt. Hood National Forest wilderness areas, including Badger Creek, Bull of the Woods, Clackamas, Lower White River, Mark O Hatfield, Mt. Hood, Roaring River, and Salmon Huckleberry Wilderness, or have any further questions, please contact Forest Recreation Program Manager, or the district wilderness managers Mark Engler at 503-622-2024 and Claire Fernandes at 541-352-1248.

*/s/Richard Periman*  
Richard Periman  
Forest Supervisor