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February 16, 2009

Lisa L. Jones  
Trails and Wilderness Program Manager  
Sandia Ranger District  
Cibola National Forest  
11776 Hwy 337  
Tijeras, NM 87059

Dear Ms. Jones:

Wilderness Watch is providing these comments in response to the Forest Service's proposal to fell "hazard" trees and use chainsaws along trails in the Sandia Mountain Wilderness.

Our concerns with the proposal as described in the January 16, 2009 scoping letter are three-fold. First, we believe the proposal to use chainsaws and to fell "hazard" trees is contrary to both the letter and spirit of Wilderness law. Second, we're concerned that the Forest Service has already determined, without even a clear understanding of the extent of the felling and clearing that will be required, that the project is exempt from NEPA. Third, we do not believe it is appropriate to close the trails in Wilderness to visitors while this natural event plays itself out over the course of the next several years.

The Wilderness Act describes Wilderness in part as an area "where the earth and its community of life are untrammelled by man...retaining its primeval character and influence...which is protected and managed so as to preserve its natural conditions." The current insect epidemic in the Sandia Mountain Wilderness exemplifies the "wilderness" the Act sought to preserve, both for its ecological values as well as the opportunity for human visitors to witness and engage.

In order to preserve the area's wilderness character, the Act also prohibits certain activities including the use of motorized equipment, like chainsaws. The law provides a narrow exception if the use of motorized equipment is the minimum required to preserve the area's wilderness character. The current proposal fails this test in every way:

Cutting down the trees has nothing to do with preserving the area's wilderness character. To the contrary, it interferes with the much slower natural process of

death and decomposition that would occur without human meddling. Many members of the Wilderness' "community of life" rely on dead, standing snags. Felling the trees would destroy their habitat.

Even if one accepts the idea that the current condition warrants a management response, the scoping letter explains that felling the trees isn't the minimum required. The minimum is to simply let the trees fall when they're ready to fall.

Once the trees are down, the use of chainsaws isn't the "minimum tool" to clear the trails. Again, the scoping letter indicates that crosscut saws will do the job, even if it could potentially take longer. Forest Service policy is clear that convenience of visitors or managers is not a legitimate reason for using motorized equipment.

Wilderness Watch also believes that the scope of this proposal requires an environmental assessment or potentially an environmental impact statement. The scoping letter does not indicate the extent of proposed motorized equipment use, except to state there is "extensive tree mortality" along 80 miles of trail. This suggests that chainsaw use and ecosystem modification could be quite extensive, certainly warranting at least an EA in Wilderness. Indeed, any proposal that include motorized equipment or ecosystem modification—both of which are the antithesis of Wilderness—should be analyzed in an environmental assessment.

Lastly, Wilderness Watch does not believe it is appropriate to close the area to visitor use due to the insect epidemic. Visitors should be allowed to experience nature on its own terms, including any risks that naturally exist. Falling trees are a natural hazard that anyone who enters a Wilderness must be willing to accept. These are not "managed" forests, gardens, or city parks. If visitors expect a manicured forest or a park-like experience in the Sandia Mountains Wilderness, then the Forest Service has failed in its educational mission to inform visitors of what Wilderness is all about.

Wilderness Watch recommends an alternative approach to the four options described in the scoping letter:

1. Trees should be allowed to fall naturally to the ground, and then using crosscut saws to clear only those trees from the trail that must be cleared.
2. Because there are likely to be a large number of trees needing to be cleared, the district should incorporate extensive "minimum impact" trail-clearing training for trail crews. When the clearing is done, the trails should appear to be a natural part of the landscape. Visitors shouldn't experience trails exhibiting the "heavy hand" of humans.
3. Warning signs should be placed at the trailheads informing visitors of the risks they assume when visiting the area. If the Forest Service is concerned about liability from a tree falling on a hiker on a system trail, then perhaps the trails should be removed from the system, and visitors informed that the trails are no longer part of the Forest Service trails system. The Forest Service may wish to inform visitors that it will consider returning the trails to the system when the agency feels it safe to again maintain and use the trails.

4. The Forest Service should use this as a “teachable moment,” an excellent education opportunity to inform visitors and local communities about Wilderness and wilderness stewardship. It presents an opportunity to talk about the scientific value of having “control” areas where nature is in charge, where we can learn about the role of insects and the evolutionary changes that have occurred for millennia. It’s also an opportunity to teach about the role of traditional skills in Wilderness, and the value of Wilderness for keeping those skills alive. Local citizens could be encouraged to participate in the trail clearing, building a sense of ownership and support for the agency’s wilderness program along the way. This has been done in other Wilderness with great success.

5. Most importantly, the challenges posed to visitors by the dying and falling trees presents an excellent opportunity to talk about the need for wilderness visitors to practice restraint. This situation teaches us that as visitors we must be prepared to modify our demands, expectations, and behavior out of respect for the place, rather than insist that the Wilderness must give to accommodate our demands. What better opportunity to show that than the current challenge presented by the situation in the Sandia Mountains Wilderness.

Finally, we’ve heard it said that the approach taken in some larger or more remote Wildernesses might not be appropriate here because the Sandia Mountain Wilderness is an “urban wilderness.” That characterization is not right. The Sandia Mountain Wilderness is a Wilderness near an urban area. More people learn about Wilderness here than in far more remote areas. The lessons they learn here about Wilderness are the lessons they take with them throughout their lives. That’s why administering the Sandia Mountain Wilderness in accord with the highest ideals of wilderness law and policy might just be more important here than in other areas.

Nature has presented the Forest Service with a grand opportunity to teach a great number of citizens about the benefits of Wilderness, and why it is administered differently than other public lands. We hope the agency is up to the challenge.

Sincerely,

George Nickas  
Executive Director