



Wilderness Stewardship Planning Toolkit



2018

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INTRODUCTION

“Wilderness is not only a condition of nature, but a *state of mind* and mood and heart.” - *Ansel Adams, nature photographer and environmental advocate*

“Three realities underlie the need for wilderness management planning: (1) *human-caused change is inevitable*; (2) *recreation use is not self-limiting*; and (3) *good planning anticipates problems*.” – *Wilderness Management. Stewardship and Protection of Resources and Values. C.P. Dawson & J.C. Hendee (2009)*

For parks with wilderness resources, NPS *Management Policies 2006* (§6.3.4.2) and Director’s Order 41 (§6.3) mandate that a wilderness stewardship plan be developed and maintained. Director’s Order 41 states: “For every designated wilderness, a Wilderness Stewardship Plan will guide management actions to preserve wilderness character. Parks should notify the WASO Wilderness Stewardship Division Chief and work with their Regional Wilderness Coordinator during the Wilderness Stewardship Planning process.”

This toolkit is intended to assist National Park Service (NPS) planning teams in writing wilderness stewardship plans. A great deal of information and resources is available on wilderness stewardship planning and the various elements that comprise these plans, such as the NPS 2014 *Wilderness Stewardship Plan Handbook*. It is not the intent of this toolkit to repeat all of this information. Rather, it is intended to generally note key points and best practices for writing each of the major components in a wilderness stewardship plan and point planners to sources for additional information. Planning teams should consult with the NPS Wilderness Stewardship Division and regional wilderness coordinators for specific guidance as needed.

A wilderness stewardship plan (may also be titled a wilderness management plan) guides the preservation, management, and use of a park’s wilderness to ensure that wilderness is unimpaired for future use and enjoyment as wilderness. These plans should provide guidance for field managers and staff with actions that are adequate and appropriate to meet goals and objectives for both day to day and long-term management.



Wilderness stewardship plans come in a variety of forms—some are standalone plans, others are part of general management plans; some cover small wilderness areas while others cover hundreds of thousands of acres; some face major visitor use issues while others face coordination issues with various land management agencies; some are combined with an environmental assessment (EA) while others by an environmental impact statement (EIS). An environmental impact statement may be warranted in some cases, for example, when there is a high degree of controversy over potential environmental impacts of a proposed action (NPS 2015). Thus, there is no single template, “one size fits all,” for wilderness stewardship plans. This toolkit provides an ala carte menu, which planners can select from as they see fit. Although suggestions and recommendations are provided here, this toolkit does not provide required, mandatory guidance (see the Wilderness Act (§4), NPS *Management Policies 2006* (§6.3), Director’s Order #41: Wilderness Stewardship (§6.3), and Reference Manual 41: Wilderness Stewardship (§6 and 7) for guidance on wilderness stewardship plans).

Five Qualities of Wilderness Character

The five wilderness character qualities are key to the development and implementation of a successful wilderness stewardship plan. *Keeping it Wild 2* (Landres et al 2015) defines these qualities:

- **Untrammled:** “This means that wilderness is essentially unhindered and free from the intentional actions of modern human control or manipulation. . . .The untrammled quality is preserved or sustained when actions to intentionally control or manipulate the components or processes of ecological systems inside wilderness. . .are not taken.”
- **Natural:** “This means that wilderness ecological systems are substantially free from the effects of modern civilization. . . The natural quality is preserved when there are only indigenous species and natural ecological conditions and processes, and may be improved by controlling or removing non-indigenous species or by restoring ecological conditions.
- **Undeveloped:** “This means that wilderness is essentially without permanent improvements or the sights and sounds of modern human occupation. This quality is affected by “prohibited” or “nonconforming” uses (Section 4(c) of the Wilderness Act,), which include the presence of modern structures, installations, and habitations, and the administrative and emergency use of motor vehicles, motorized equipment, or mechanical transport. . . The undeveloped quality is preserved or sustained when these nonconforming uses are not used by the agency for administrative purposes or by others authorized or not authorized by the agency. It is improved when the prohibited use is removed or reduced.”
- **Solitude or Primitive and Unconfined Recreation:** “This means that wilderness provides outstanding opportunities for recreation in an environment that is relatively free from the encumbrances of modern society, and for the experience of the benefits and inspiration derived from self-reliance, self-discovery, physical and mental challenge, and freedom from societal obligations. The. . .quality is preserved or improved by management actions that reduce visitor encounters, reduce signs of modern civilization inside wilderness, remove agency-provided recreation facilities, or reduce management restrictions on visitor behavior.”
- **Other Features of Value:** This quality addresses other values of wilderness not covered by the other four qualities, including resources of ecological, geological, scientific, educational, scenic, or historical value. “Typically these occur in a specific location, such as archaeological, historical, or paleontological features; some, however, may occur over a broad area such as an extensive geological or paleontological area, or a cultural landscape. . . This quality may or may not occur within a specific wilderness, and is therefore different from the other four qualities that, by law, occur in every wilderness. This quality is preserved when these “other features of value” are preserved.”

(For more details on the five qualities of wilderness character, see NPS 2014a and b and Landres et al 2015.)



Organization of the Wilderness Stewardship Toolkit

The toolkit addresses eight key components found in a typical wilderness stewardship planning process. These components are:

1. **Collect and analyze background information:** laying the groundwork for the plan, collecting information, identifying planning and project management considerations, and defining current management (the “no-action” alternative).
2. **Conduct internal scoping:** defining the purpose and need for the plan, identifying issues and opportunities from the NPS perspective, and identifying possible desired conditions, management options, and a proposed action to address those issues and opportunities.
3. **Conduct external scoping:** identifying the public’s and other agencies’ views on desired conditions for the wilderness and issues and opportunities facing the wilderness, and gathering feedback on the preliminary purpose and need and the proposed action the planning team is considering.
4. **Formulate alternatives:** determining management goals and desired conditions for the wilderness and possibly wilderness zones, and identifying a range of reasonable, feasible management actions to achieve the overall vision for the wilderness and address issues and opportunities. This also includes identifying actions common to all of the action alternatives and elements such as the cost of the alternatives, staffing levels, and mitigation measures.
5. **Identify the NPS preferred alternative:** conducting a preliminary impact analysis of the alternatives and determining which actions the planning team is proposing for managing the wilderness areas.
6. **Complete compliance requirements:** selecting the appropriate National Environmental Policy Act (NEPA) pathway, fulfilling all the NPS NEPA requirements, and ensuring other compliance requirements, such as section 7 for endangered species and section 106 of the National Historic Preservation Act, are met.
7. **Identify programmatic minimum requirements:** determining if programmatic minimum requirements are needed and appropriate, and, if so, describing them.
8. **Amend/visit the wilderness stewardship plan:** including criteria to evaluate the wilderness stewardship plan and determine if and when the plan should be amended or revised.

Public Involvement in the Wilderness Stewardship Planning Process

Public involvement is an essential, integral element in all steps of a wilderness planning process, particularly at the beginning of the planning process and during review of the draft plan. However, aside from the discussion of external scoping and NEPA requirements for review of the plan, public involvement is not addressed in this toolkit. Many other sources of information are available that describe public involvement techniques, best practices, designing a public involvement strategy, etc. Readers are directed for more information to: NPS *Management Policies 2006* (§1.7 Civil Engagement and 2.1.3 Public Participation); Director's Order 75A "Civic Engagement and Public Involvement;" the *Wilderness Stewardship Planning Handbook* (pp.26-28); and the *General Management Planning Dynamic Sourcebook* (chapter 5), among other sources.

Why do Plans Succeed?

- Provides appropriate specificity
- Resolves key issues
- Realistic
- Provides for flexibility
- Integrated with other plans
- Public and agency acceptance
- Reflects interdisciplinary viewpoints
- Developed in a timely manner
- Park staff has resources to implement the plan



General Sources of Information on Wilderness Planning

Dawson, Chad P. and John C. Hendee

- 2009 *Wilderness Management. Stewardship and Protection of Resources and Values.* 4th edition. Fulcrum Publishing, Golden, CO.

Landres, P.; C. Barns, S. Boutcher, T. Devine, P. Dratch, A. Lindholm, L. Merigliano, N. Roeper, and E. Simpson

- 2015 *Keeping it Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System.* Gen. Tech. Rep. RMRS-GTR-340. US Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fort Collins, CO. http://wilderness.nps.gov/RM41/6_WildernessStewardship/KeepingItWild2InteragencyStrategy.pdf

National Park Service

- 2015 *NPS NEPA Handbook:*
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf

Selecting the NEPA Pathway: pp. 16-22

- 2014a *Keeping it Wild in the National Park Service. A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring.* http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf

- 2014b *Wilderness Stewardship Plan Handbook. Planning to Preserve Wilderness Character.* https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm

NPS Wilderness Stewardship Program, “Wilderness Stewardship Planning” <http://share.inside.nps.gov/sites/WASO/WSD/WC/Wilderness%20Stewardship%20Planning/Forms/AllItems.aspx>

Wilderness.net wilderness planning toolbox www.wilderness.net/planning

Wilderness Basics Tool Kit <https://sites.google.com/a/nps.gov/wilderness-basics-toolkit/>

Wilderness Planning, Intermountain Region PowerPoint <http://www.wilderness.net/toolboxes/documents/planning/Wilderness%20Planning-SMS2.ppt>

Covers why planning is important, planning principles, the planning process, ingredients of a good plan, and planning tools.

DSC-WSP_BuildingBlocks_Training_2016.pptx (This PowerPoint on wilderness stewardship planning provides an overview and notes its context in the park planning framework. The PowerPoint is on the V drive in the Wilderness Stewardship Plans folder.)

Another source of information is the Arthur Carhart National Wilderness Training Center’s wilderness stewardship planning framework online course (see <http://www.wilderness.net/NWPS/elearning>)

Examples of Wilderness Stewardship Plans

- *Apostle Islands National Lakeshore General Management Plan / Wilderness Management Plan / EIS* (2011) <https://parkplanning.nps.gov/projectHome.cfm?projectID=10903>
- *Death Valley National Park Wilderness and backcountry Stewardship Plan / EA* (2012) <https://parkplanning.nps.gov/projectHome.cfm?projectID=23311>
- *Petrified Forest National Park Wilderness Stewardship Plan / EA* (2013) <https://www.nps.gov/pefo/learn/management/upload/PEFO-Wilderness-Stewardship-Plan-Environmental-Assessment.pdf>
- *Jimbilnan, Pinto Valley, Black Canyon, Eldorado, Ireteba Peaks, Nellis Wash, Spirit Mountain, and Bridge Canyon Wilderness Areas Wilderness Management Plan / EIS* (Lake Mead NRA 2014) <https://parkplanning.nps.gov/projectHome.cfm?projectID=16820>
- *Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan / EIS* (2015) <https://parkplanning.nps.gov/projectHome.cfm?projectID=33225>
- *Gates of the Arctic National Park and Preserve General Management Plan Amendment / Wilderness Stewardship Plan / EA* (2015) <https://parkplanning.nps.gov/projectHome.cfm?projectID=30266>

(See also appendix 2.6 of *Keeping it Wild in the National Park Service* for other examples of past wilderness stewardship planning.)

Plans in Process as of March 2017

- *Black Canyon of the Gunnison National Park Wilderness and Backcountry Management Plan / EA* <https://parkplanning.nps.gov/projectHome.cfm?projectID=16726>
- *Everglades National Park Wilderness Stewardship Plan*
- *Mount Rainier National Park Wilderness Stewardship Plan / EIS* <https://parkplanning.nps.gov/projectHome.cfm?projectId=55349>
- *Isle Royale National Park Wilderness and Backcountry Management Plan / EIS* <https://parkplanning.nps.gov/projectHome.cfm?projectID=14066>
- *Olympic National Park Wilderness Stewardship Plan / EIS* <https://parkplanning.nps.gov/projectHome.cfm?projectID=29224>
- *Wrangell-St. Elias National Park and Preserve Backcountry and Wilderness Stewardship Plan and GMP Amendment / EA* <https://parkplanning.nps.gov/projectHome.cfm?projectID=44299>

KEY COMPONENTS OF THE WILDERNESS STEWARDSHIP PLANNING PROCESS

“Your job is never done. Protecting your wilderness takes time and effort, but it is worth it in order to secure for the American people of present and future generations the benefits of an enduring resource of wilderness” – Arthur Carhart Wilderness Stewardship Planning Framework

Component 1. Collect and Analyze Background Information

Prior to developing action alternatives, the planning team must consider, and where necessary, carefully outline those components that are essential to informing the NEPA (and alternative development) process. This effort includes:

- collecting wilderness background information
- identifying planning considerations
- defining the no-action alternative

Wilderness Background Information

The wilderness background section establishes a common understanding of the park unit’s wilderness status, boundaries, and legislative history. Primary components include the (1) park-specific wilderness legislation and legislative history; (2) an accurate GIS map that includes the wilderness boundary layer; (3) statements of park purpose, significance and fundamental resources and values related to wilderness; and (4) the relationship of wilderness planning to the general management plan (GMP) and other plans.

The wilderness background section in foundation documents should address wilderness legislation and the relationship of wilderness planning to the general management plan and other plans. A map of the wilderness area should be included in the park atlas and statements of park purpose, significance and fundamental resources and values should be addressed in the park’s foundation document.

Other background materials that provide context for the park unit’s wilderness resource may include the following:

Wilderness Eligibility Assessment – general evaluation of park lands possessing wilderness characteristics for possible inclusion in the national wilderness preservation system. The assessment is the first step in the wilderness study process.

Wilderness Study – a formal study of lands determined to be eligible for inclusion in the national wilderness preservation system. The study further determines whether lands should be proposed by the National Park Service for designation as wilderness. The study requires public review and comment and may be included as part of a comprehensive planning effort, such as a GMP update.

Wilderness Basics – the initial “building blocks” that include a summary of the wilderness area’s legislative background, a wilderness character narrative, and issues for future wilderness planning. The “basics” provide the groundwork for incorporating wilderness character into planning, management, and monitoring (the interactive Wilderness Basics Toolkit provides further guidance: <https://sites.google.com/a/nps.gov/wilderness-basics-toolkit/>).

Wilderness Character Assessment – provides quantifiable measures to identify the baseline condition of a park’s wilderness character that can be monitored to track change over time. Wilderness stewardship planning references the measures (and supporting data) identified for each indicator in the wilderness character baseline assessment to help inform and determine appropriate standards and management actions if the standards are being approached or violated.¹

Enabling legislation and congressional history – the three primary components in the wilderness background section include obtaining and summarizing park-specific wilderness legislation and legislative history (or if not designated, history of the wilderness study and current status); obtaining an official boundary map as filed with the Wilderness Stewardship Division showing the wilderness boundary; and the relationship of wilderness stewardship to existing and future park plans to provide context for park management. Each of these elements is included in the “Wilderness Basics” (page 9).

Related plans and studies – examples of plans and studies include the park’s foundation document, a visitor use management plan, fire management plan, ethnographic study, etc.

Planning Considerations

This section addresses how completed, ongoing, or future planning efforts may affect wilderness area management, such as general management plans, backcountry plans, fire management plans, and visitor use related plans. Key elements of these plans that affect wilderness, such as the identification of wilderness-specific management zones, visitor carrying capacities and monitoring indicators and standards, should be summarized. The relationship of wilderness to plans in progress or future plans should also be addressed, such as the role of wilderness in a visitor use management plan. Note that the Finding of No Significant Impact (FONSI) or Record of Decision (ROD) allow for the adoption of the actions in a wilderness stewardship plan. The Finding of No Significant Impact or Record of Decision include respective National Environmental Policy Act) and National Historic Preservation Act (NHPA) compliance, and involve public participation and coordination with other agencies and tribes.

The following considerations are particularly important to informing the wilderness stewardship plan:

1. **Category of wilderness:** the term “wilderness” includes the categories of eligible, study, proposed, recommended, and designated wilderness. The category “potential” wilderness may be a subset of any of these five categories.
2. **Backcountry vs wilderness stewardship plan:** note there are some special considerations when developing a plan that addresses both wilderness stewardship and backcountry management. See the *Wilderness Stewardship Plan Handbook* for more details on this topic (pages 21-23).
3. **Cooperative management:** per the National Environmental Policy Act and other legal and NPS policy requirements, the planning process includes public involvement and consultation with other agencies² (e.g., US Fish and Wildlife Service, State Historic Preservation Office) and traditionally associated American Indian tribes. Regarding tribal consultation, wilderness use may be subject to a treaty right by a formerly occupying tribe to engage in certain activities, for example. Similarly, the wilderness unit may have an overlapping Traditional Cultural Property (TCP) designation indicating an area of cultural significance to tribal members and be listed in the National Register of Historic Places. The process might also include cooperative management of jointly managed areas, such as wilderness units that combine NPS jurisdiction with another federal agency.

¹ The wilderness character assessment *identifies* baseline condition of a park’s wilderness character – the wilderness stewardship plan *sets* standards for wilderness character qualities, which are subject to NEPA and addressed in the appropriate NEPA pathway as part of the stewardship planning process.

² Consultation with federal agencies such as the US Fish and Wildlife Service (required per Section 7 of the Endangered Species Act when a federal agency carries out, funds, or authorizes any action that *may affect* a federally listed endangered or threatened species) and State Historic Preservation Office (per National Historic Preservation Act requirements) are only triggered if the plan’s actions may impact those resources. Consultation is not required in every case.

4. **Relationship with other plans:** the wilderness stewardship plan alternatives should be consistent with other plans, such as the general management plan and visitor use management plan. Zoning should be consistent in the general management plan and wilderness stewardship plan, for example. Note that any changes in the wilderness stewardship plan that are contrary to the general management plan would require an amendment to the plan.¹
5. **Other unit designations:** presence of other unit designations, such as wild and scenic rivers, national trails, and scientific natural areas, need to be considered. Wild and scenic rivers, for example, are intended to safeguard outstanding river values while recognizing the potential for appropriate uses. Similar to Traditional cultural Properties (mentioned above), other unit designations have overlapping management criteria that affects, and in many cases, restricts wilderness stewardship alternatives.
6. **Management of prior and ongoing uses (including nonconforming uses):** previous uses of the wilderness unit, such as grazing, may be allowed by the wilderness area's enabling legislation, and similar to other unit designations, affect wilderness stewardship planning initiatives. The following are some of the most common prior and/or ongoing uses that need to be considered in a wilderness stewardship plan:
 - stock use
 - rights-of-way
 - use of aircraft and motorboats when these uses have already been established in the area (per §4(d)(1) of the Wilderness Act)
 - mineral rights and extractive activities
 - water rights
 - resource management activities (e.g., fire management, wildlife management)
 - historic structure management
 - scientific activities
 - commercial services
 - NPS administrative activities (including use of motorized equipment and mechanical transport)

¹ A GMP amendment can also be conducted through the wilderness stewardship plan / NEPA process, consistent with the NPS planning framework. This is not a common option, but it can be considered by future planning teams.



No-Action Alternative

The National Environmental Policy Act and NPS policies require park managers consider a full range of reasonable alternatives, including a no-action alternative before choosing a preferred alternative. The primary purpose of the no-action alternative (required by NEPA) is to serve as a baseline for comparing the effects of the action alternatives to the effects of the status quo. The no-action alternative is the continuation of current management actions and direction into the future; i.e., continuing with the present course of action until that action is changed. “No action” does not mean that the park managers do nothing. Rather, the no-action alternative should present how the park staff would continue to manage natural resources, cultural resources, and visitor use and experience (including access) if a new activity, plan, or project was not approved and implemented.

The description of the no-action alternative should provide a comprehensive overview of the current approach to wilderness management, including resource management, the management of visitor use and experience, and park operations. If no reasonable alternatives are developed during scoping and planning, “no-action” may be the only alternative to a proposed action (this should be the exception, not the rule).

A question often arises as to whether or not to include projects in current or future planning stages in the no-action alternative. In general, projects or actions should only be included in the description of the no-action alternative if at least one of the following criteria applies:

- the action or project is underway and ongoing,
- the action or project is funded or funding is imminent this fiscal year,
- the project was approved by the Development Advisory Board, and the appropriate environmental compliance is complete or underway,
- a memorandum of agreement is in place with a partner regarding the action or project,
- the action or project is congressionally authorized or legally mandated by a court, and/or
- the action or project is in the US Department of the Interior National Park Service fiscal year budget justification (Green Book).

Best Practices for Outlining the No-Action Alternative

- If the level of commitment to implement these actions does not meet one of the six criteria (listed above), the proposals in previous planning documents may be reconsidered in the current planning effort as part of the action alternatives.
- If the continuation of any management activities would violate laws or policies, these should be noted in the no-action alternative description.
- A project with an assigned PMIS number is not sufficient rationale for including it in the description of the no-action alternative.
- The alternative should be written in the conditional tense (e.g., “would continue”).
- The alternative should represent a legitimate, viable alternative that could be selected by the decision maker.

Sources of Additional Information

National Park Service

- 2015 *NPS NEPA Handbook*:
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf
- No action Alternative: pp. 55-56
- 2014 *Wilderness Stewardship Plan Handbook. Planning to Preserve Wilderness Character* http://wilderness.nps.gov/RM41/6_WildernessStewardship/WildernessStewardshipPlanHandbook_2014.pdf
- Data gathering and analysis: pp. 29-30
 - No action alternative: pp. 62
- 2006 *NPS Management Policies 2006*
- Section 6.3.4 “Wilderness-related Planning and Environmental Compliance,” p.81



Component 2. Conduct Internal Scoping

“Plans to protect air and water, wilderness and wildlife are in fact plans to protect man.” - Stewart Udall, politician and Secretary of the Interior, 1961-1969

The wilderness stewardship planning process relies on the strong commitment and combined effort of an interdisciplinary team throughout the project. Internal scoping provides key input to identify data needs and additional expertise needed throughout the process to guide wilderness stewardship. Through scoping, the team can begin to develop the plan’s proposed action, its purpose and need, preliminary management options, and confirm the appropriate NEPA pathway.

Identifying issues and opportunities related to wilderness management is an essential component of internal scoping. The plan’s proposed action, purpose and need, goals, objectives and preliminary management options may be adjusted after public involvement. This stage of the stewardship planning process also establishes the project agreement (i.e., the who, what, when, where, why, and how responsibilities).

Internal scoping should begin by assembling a strong interdisciplinary team composed of park staff and other relevant partners, including NPS staff, tribes, contractors, cooperating agencies, or other land managers. A park superintendent’s commitment to empower the team throughout the planning process is essential. Success depends on a strong understanding of wilderness character, good communication among the team members, and a willingness to listen to others and share diverse perspectives.



If the wilderness basics building block (see “Collect and Analyze Background Information” section) has been prepared for the park, internal scoping may have already begun as part of that process. Otherwise, the team should gather and compile basic wilderness information to better understand the extent, status, and context of wilderness resources and develop a wilderness character narrative that articulates the five qualities of wilderness character that include the other features of value quality when applicable. Internal scoping results in an initial assessment of significant wilderness issues and opportunities that the wilderness stewardship plan should address. Note that much of internal scoping (e.g., wilderness basics and wilderness character assessment) is “pre-NEPA” planning. The NEPA process begins when there is a proposed action and the proposed action can be meaningfully evaluated (which may also be included by the planning team in the internal scoping tasks). The team should also determine during internal scoping whether or not to combine a wilderness stewardship plan with other types of plans, such as a backcountry management plan, commercial services plan, or general management plan.

Once these preliminary steps have been completed, staff can make an assessment of the data requirements necessary to begin the decision-making process. Data may already be available; however, if there are significant gaps, the team should pause and obtain necessary information before formally initiating a NEPA process. Wilderness stewardship planning should be based on sound science yet avoid “analysis paralysis.”

Develop Purpose and Need for the Plan

Defining the overarching purpose and need for the plan is a key step in the NEPA process. For a wilderness stewardship plan, the purpose is to protect wilderness character qualities through sound stewardship practices. The need for the plan is to resolve management issues for the wilderness area. Thus, the purpose and need statement provides the foundation or “rationale” for proposed strategies outlined in the plan. More specifically, the “purpose” includes a statement of goals and objectives that the National Park Service intends to fulfill by taking action, while the “need” often outlines existing conditions that correspond to “why” a park is proposing an action at a given time. The need might include discussion of existing conditions that may have changed over time, problems that need to be remedied, decisions that need to be made, and policies or mandates that need to be implemented.

Best Practices for Developing the Purpose and Need For The Plan

- Detail the reasons the wilderness stewardship plan is being prepared, and outline the problems and challenges for the management and stewardship of the wilderness.
- Include discussion and explanation of the “on-the-ground purposes” for the plan (not simply a summary of NEPA requirements).
- Identify specific goals necessary to deem wilderness stewardship successful (not just a recap of purposes that stem from law, such as the Wilderness Act and the wilderness area’s enabling legislation).
- Include language that identifies why the park staff needs to take action at this time.

Describe the Proposed Action

A proposed action (or “the proposal”) is the initial NPS proposal to address a purpose and need. The proposed action is one option (alternative) for addressing purpose and need and must be clearly stated in the environmental assessment or environmental impact statement to proceed with NEPA analysis. Hence, when preparing the wilderness stewardship plan, the team may develop alternatives to the proposed action that constitute different ways to address purpose and need.

The level of detail of a proposed action can vary, however. According to NEPA requirements, while the team is encouraged to include as much detail as possible in the description of the proposed action, in many cases it may not know all of the details at the scoping phase. Therefore, the proposal description may be vague at that time. As the NEPA process moves forward and additional details are developed, the team should update the description of the proposed action so that by the time the environmental assessment or draft environmental impact statement is released, the proposed action constitutes an alternative that is developed to the same level

of detail as the other alternatives under consideration. A proposed action may become the preferred alternative during the NEPA process.

At a minimum, internal scoping materials should include information regarding what action is being proposed and how, when, and where it could be implemented. During internal scoping, the project team may meet with interested parties prior to initiating the NEPA process to gather input on a proposed action – as well as the purpose and need for taking action and other issues.

Identify Issues, Opportunities, and Desired Conditions

Identifying key issues, opportunities, and desired conditions for wilderness stewardship helps inform the plan’s proposed action as well as additional management activities that may be needed to ensure high quality wilderness stewardship. A key issue, in particular, usually includes the following traits:

- affects overall management of the wilderness area,
- substantially affects wilderness users,
- affects whether or not one of the five wilderness character qualities is being preserved,
- has a risk of legal challenge,
- sets a precedent that affects management of other wilderness areas,
- has the potential for considerable controversy, and
- is inconsistent with agency wilderness management policy.

A planning team should devote some time to considering the desired conditions for a wilderness area, from wilderness quality, resource, visitor experience, and administrative standpoints. Desired conditions in this context refers to wilderness-wide conditions that the National Park Service aspires to achieve and maintain over time and the conditions necessary for visitors to understand, enjoy and appreciate those conditions. (This use of the term “desired conditions” is broader than how it is used in wilderness zoning, which is discussed later in formulating alternatives.)

The identification of issues, opportunities, and desired conditions—both short and long-term—is largely based on information collected during development of the Wilderness Basics building blocks (or a previous wilderness character narrative workshop); development of the park foundation document; reviews of past and ongoing plans; and discussions with park, regional, and Washington office staff and other relevant stakeholders. The effort is therefore a central component of internal scoping for the wilderness stewardship plan. It may also identify areas in which more data are required to competently develop specific planning alternatives. For example, the team may identify that a key issue for the plan will be addressing high levels of day-use visitation or initiating data collection on current day use levels.

Some issues may not need a plan to be resolved, but rather are operational issues for the park unit. These could include establishing a trackable process for administering the wilderness minimum requirements analysis for routine and non-routine activities, administration of user permit systems or fees, and administration of commercial services in wilderness (assuming the appropriate extent necessary determination is already completed).

A wilderness stewardship plan can address many of the wilderness-wide issues related to wilderness character. For example, the establishment of a wilderness character monitoring program, the development of an extent necessary determination for commercial services, or the framework for how science and research are conducted in a wilderness may be addressed in a wilderness stewardship plan. Issues that are not well-understood, such as an emerging recreational use or adaptations to climate change, also may be considered in a wilderness stewardship plan.

The following table identifies possible issue topics facing many wilderness areas. Other topics may apply to a specific area. (See also appendix 4 of the *Wilderness Stewardship Planning Handbook* for an extensive list of issue topics that may be considered in a wilderness stewardship plan.)

Possible Issue Topics for Wilderness Areas

- Climate change impacts and related management implications.
- Visitor-related impacts (such as impacts from new or emerging recreational uses, increasing use and overcrowding, or resource damage associated with recreational use).
- Cultural resource management in conflict with the undeveloped quality and/or the solitude quality.
- Fire management.
- Exotic, invasive species' impacts on the natural quality.
- Management of threatened and endangered species.
- Ecological intervention and restoration of disturbed ecosystems to improve the natural quality at the expense of the untrammelled quality.
- Interpretive installations.
- Communications installations.
- Emergency and search and rescue services' impact on wilderness character.
- Water issues (including water rights, water flows, water pollution, groundwater withdrawals).
- Park operations/administration (e.g., implementation and monitoring of minimum requirement analyses, permits).
- Management of nonfederal mineral rights (including oil and gas).
- Air tours and overflights.
- External development (e.g., urban growth adjacent to wilderness boundaries; new transmission line corridors and other utilities infrastructure).
- Commercial services management (including developing an extent necessary determination).
- Management of scientific research and monitoring activities in wilderness.
- Use of technology.
- Boundary issues, including inholdings and easements (e.g., livestock trespass or historic roads).

In addition to the examples listed above, there are numerous issues that are largely beyond NPS control but may be influenced by the agency. Examples include forest management decisions on surrounding lands that affect forest structure and composition over time; recreational hunting and fishing activities inside and outside of the park unit; land use changes and fragmentation of habitat that can impede wildlife movements and/or gene flow; and noise and light pollution from adjacent lands and waters. Issues beyond federal control and responsibility are not subject to the National Environmental Policy Act. Some best practices for identifying issues and opportunities are highlighted in the following table.

Best Practices for Identifying Issues, Opportunities, and Desired Conditions for Wilderness Stewardship

- Revisit and update issues identified in the Wilderness Basics and park foundation.
- A key issue requires a decision and related action by wilderness area managers.
- Focus on the key or critical wilderness issues that need to be addressed to avoid/minimize major conflicts or degradation of wilderness character.
- The issue identification should clearly describe what the issue is and why it is important to address.
- The number of key issues will vary depending on the wilderness; if too many issues are included, however, it will be unclear which are the key, priority issues that need to be addressed (the list is dynamic and will likely change over time).
- Group issues according to whether they are short term or long term and whether the National Park Service has direct control, indirect control/influence, or no control/influence. Focus on providing details for those issues over which the agency has direct control (i.e., the NPS won't, in most cases, develop alternatives that address issues beyond federal control and responsibility).
- Wilderness-wide desired conditions will help shape management goals and objectives in developing alternatives for wilderness stewardship. Do not confuse wilderness-wide desired conditions with area-specific desired conditions that are addressed when considering wilderness zoning.

Identify Management Options

After key issues and opportunities are identified, revised, or updated, the project team can begin to develop a range of management options to consider in the wilderness stewardship plan. Management options help inform management possibilities for a wilderness area. They are an initial first cut at identifying a “menu” of ways to protect the area’s wilderness character qualities and address key issues and opportunities. Developing management options through internal scoping allows the planning team to explore different approaches to wilderness stewardship before engaging the public and identifying a preferred alternative later in the planning process. These options can then be used to formulate the plan’s alternatives.

Best Practices for Identifying Management Options

- Management options should reference important aspects of wilderness stewardship, focused on preserving wilderness character.
- Respect the statutory requirements imposed by the Wilderness Act, the Alaska National Interest Lands Conservation Act (for Alaska wilderness areas), and the directions established in NPS wilderness management policies.
- Be sure to consider the baseline information in the wilderness building blocks and wilderness character assessment in identifying possible management options. The park’s wilderness character assessment⁴ provides a monitoring framework for tracking changes in wilderness character and uses nationally standardized monitoring questions and indicators to select measures that track wilderness character conditions over time.

⁴ The Wilderness Character Assessment builds off the Wilderness Basics building blocks and provides a systematic, quantifiable means of identifying the baseline condition of a park’s wilderness character that can then be monitored to track change over time. A national, interagency wilderness monitoring database has been developed to collect and report data: <https://wc.wilderness.net/>.

Sources of Additional Information

Landres, P.; C. Barns, S. Boutcher, T. Devine, P. Dratch, A. Lindholm, L. Merigliano, N. Roeper, and E. Simpson

- 2015 *Keeping it Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System*. Gen. Tech. Rep. RMRS-GTR-340. US Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fort Collins, CO. http://wilderness.nps.gov/RM41/6_WildernessStewardship/KeepingItWild2InteragencyStrategy.pdf

National Park Service

- 2016 *Wilderness Character Assessment Workshop Participant Guide*. (This is on the V drive at V:\DSC Planning Library\Wilderness Planning Library\Wilderness Character Assessment\Wilderness Assessment Participant Guide)
- 2015 *NPS NEPA Handbook*
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf

Developing purpose & need: p.15

- Internal scoping: pp. 42-43
- Defining the proposed action: pp. 48-49

- 2014 *Wilderness Stewardship Plan Handbook. Planning to Preserve Wilderness Character*: http://wilderness.nps.gov/RM41/6_WildernessStewardship/WildernessStewardshipPlanHandbook_2014.pdf

- Internal scoping: pp. 19-20
- Developing purpose & need: p. 54
- Possible management issue/action topics for a wilderness stewardship plan: pp. 90 - 115



Component 3. Conduct External Scoping

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.”

—Wilderness Act of 1964.

Public involvement is essential to the planning process. During external scoping, the National Park Service is seeking to learn the public’s ideas and concerns and also to identify public goals and objectives for the future. This step in the planning process helps to inform the development of the plan. The planning team should fully identify the range of interested stakeholders and be mindful of how it will communicate with public audiences, including the use appropriate communication tools (e.g., newsletters, PEPC, social media).

Public Scoping

To be most helpful, public scoping should take place after internal scoping so that the public can see the purpose and need for action and consider the proposed action and any preliminary alternatives or alternative elements put forward by the National Park Service. A proposed action is required during scoping for an environmental impact statement and it must be published in a Notice of Intent (NOI) in the Federal Register. Whether the stewardship plan is scoped as an environmental impact statement or environmental assessment, the planning team is additionally encouraged to identify a preliminary range of alternatives or preliminary alternative elements at the public scoping phase—it is not predecisional to do so. Including such information can enhance the value of public scoping comments and create efficiencies by allowing the team to address the public’s concerns about a proposed action and alternatives while it is still developing them, rather than waiting until a proposal and alternatives are fully developed.

Like internal scoping, public scoping, is a process rather than a single event or meeting. The planning team has flexibility to determine how exactly to engage the public and is encouraged to use a variety of means to solicit early input, including public notices, public meetings, direct or electronic mailings, and solicitation of comments through the PEPC system. The standard NPS practice is to accept written comments by mail, at public meetings if applicable, at a park unit headquarters, and online through the PEPC system. The preferred method for receiving public comments is through the PEPC system, and, if the planning team chooses PEPC as the primary commenting tool, it should clearly communicate this intent in public outreach materials.

All public scoping comments that are received should be reviewed, and substantive comments should be considered. The planning team is not required to provide responses to public scoping comments, and standard NPS practice is not to do so. Instead, the team should address the issues that are raised in public scoping comments during the process of preparing the wilderness stewardship plan. Most issues should be addressed to some degree in the text of the plan itself. Addressing scoping comments in this manner is sufficient to demonstrate that the National Park Service has reviewed and considered the comments.

Public Scoping for an Environmental Assessment. The DOI NEPA regulations require that public notification and public involvement be conducted to the “extent practicable” when an environmental assessment is being prepared. Therefore, public scoping for an environmental assessment is strongly encouraged. The recommended practice with regard to public scoping for environmental assessments is a comment period announced on PEPC and through a press release, direct or electronic mailings, or other effective means of communication. In some instances, public meetings during the scoping period may be helpful or appropriate, but they are not required. There is no required minimum length for a public scoping comment period for an environmental assessment. However, a comment period of 30 days is recommended. Although a closing date for public scoping is typically established, comments received after the closing date should be considered when feasible.

Public Scoping for an Environmental Impact Statement. Public scoping is required when preparing an environmental impact statement, as is publication of a notice of intent in the Federal Register. Publication of

a notice of intent initiates the formal public scoping period although it is possible to begin scoping activities in advance of publication (specific procedures vary by NPS regional office). The notice of intent must, at a minimum, describe the proposed action and possible alternatives (to the extent they are developed); describe the public scoping process; indicate whether, when, and where public meetings will be held; and include the name and address of an NPS contact who can answer questions about the proposed action and the EIS process. In addition to publication of the notice of intent, it is standard NPS practice to announce public scoping on PEPC and through a press release, direct or electronic mailings, or other effective means of communication.

As with environmental assessments, there is no required length for the public scoping comment period for an environmental impact statement. The standard NPS practice is a comment period of 30 days; however, depending on a number of factors, including the degree of public interest, a longer or shorter period may be appropriate. As with environmental assessments, although a closing date is typically established for the public scoping period, comments received after the closing date should be considered when feasible.

Best Practices for Conducting Public Scoping

- Fully identify the range of interested stakeholders and decide the most appropriate methods to engage the public, which may include open houses, field trips, and forums, as well as communication tools such as newsletters, PEPC, websites, and social media.
- Identify (or update) a preliminary range of alternatives or preliminary alternative elements, including the proposed action.
- Consider using social media to invite participation from a broader audience than is typically reached with park press releases and legal notices in the newspaper of record.
- If using PEPC, post links to direct people to the site to read planning newsletters, conceptual draft alternatives, or public review document.
- Consider using interactive mapping technology via links in PEPC or during public meetings.



Agency Consultation

Consulting with relevant local, state, and federal agencies and tribal governments is an important part of any planning process, and the wilderness stewardship plan should adhere to the same general guidelines as other substantial planning efforts. As part of the environmental compliance process, consultation may be required to comply with section 7 of the Endangered Species Act or section 106 of the National Historic Preservation Act. Relevant agencies should be identified during internal scoping, consulted during external scoping, and involved throughout the process to the extent agreed upon in scoping.

In regard to tribal consultation, it is essential for the planning team to respect and incorporate tribal perspectives in wilderness planning and management through consultation—communicating with tribes early and often, separately from and prior to stakeholder and public meetings if necessary, and throughout the duration of the planning process. The planning team should recognize that government-to-government consultation is required with federally recognized tribes that are traditionally associated with parks. Through consultation, tribal representatives can share their knowledge and their concerns, which may include maintaining access to traditional cultural properties and reburials within wilderness and collecting specific plant and other materials within wilderness for cultural purposes.

While scoping for an environmental assessment, the planning team should, at a minimum, contact all potentially affected federal, state, and local agencies and tribal governments early in the process to discuss information related to the environmental assessment. When preparing an environmental impact statement, project teams *must* notify and invite the input of potentially affected agencies and tribes in writing.

Best Practices for Agency Consultation

- When the project team reaches out to other agencies and tribal governments regarding NEPA-related issues, it should also initiate contact with relevant agencies for other required consultation (such as ESA Section 7 or NHPA Section 106).
- Engaging agencies and tribal governments early in the planning process is important for successful wilderness stewardship planning by helping identify potential issues early and potentially saving time later.
- Engaging tribal governments during agency scoping may be part of, but is not a substitute for, government-to-government consultation that may be required by other authorities.
- If the NPS wilderness area adjoins a wilderness area managed by another agency or a single wilderness is split between managing agencies, integrating the other agency into the planning process is critical for successful wilderness stewardship planning.



Sources of Additional Information

National Park Service

- 2015 *NPS NEPA Handbook*
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf
- Agency scoping: p.43
- 2014 *Wilderness Stewardship Plan Handbook. Planning to Preserve Wilderness Character* https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm
- Public involvement: p. 26
 - Agency and tribal consultation: pp.27-28, 69
- 2008 *General Management Planning Dynamic Sourcebook* <http://share.inside.nps.gov/sites/WASO/PPFL/PSS/GMP/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2F-WASO%2FPPFL%2FPSS%2FGMP%2FShared%20Documents%2FWASO&FolderC-TID=0x01200033265CA3871B064299A2CAAE3F47AC9C&View=%7B13F1F347-4D33-408E-8FCD-B2844DA46B8E%7D>
- Public involvement: pp. 5-1 to 5-12
 - Appendix D (Public Involvement): pp. D-1 to D-32



Component 4. Formulate Action Alternatives

Wilderness is a resource which can shrink but not grow. . .the creation of new wilderness in the full sense of the word is impossible. – Aldo Leopold

Alternatives represent different ways to solve issues and problems, achieve the vision of the wilderness area, protect the area’s wilderness character, and meet the goals and desired conditions articulated in the purpose and need for the plan. All alternatives should protect an area’s wilderness character and meet the purpose and need for a wilderness stewardship plan; they typically vary in how to achieve these ends.

Alternatives are developed by considering and integrating the planning team/park staff’s goals for the wilderness area, the management options and issues identified in internal scoping, and the ideas and issues identified in external scoping. These alternatives are the primary basis of comparison between different approaches to managing the wilderness area and should be clear articulations of possible future conditions for the area. Each alternative generally should be unified by a central management concept that can be achieved through a set of targeted management actions.

Alternatives may address specific current issues, but they also should be goal-driven, ensuring that all of an area’s wilderness character qualities are protected and maintained. There is a tension between addressing existing pressing issues and providing the general direction and guidance that will be needed to address future wilderness issues that haven’t been thought of yet. If a wilderness stewardship plan addresses only existing issues, it will become prematurely outdated and even irrelevant if another issue, which was not anticipated during the planning process (e.g., climate change), comes into play 10 years down the road—a balance needs to be achieved between achieving the vision for the wilderness area and addressing current issues. Some issues also may be better addressed in another type of plan, such as a visitor use management plan or a resource management plan.

According to federal regulations, a reasonable range of alternatives must be developed as part of any environmental assessment or environmental impact statement. Because the Wilderness Act policies constrain what can and cannot occur in wilderness, however, only a few alternatives are usually considered in a wilderness stewardship plan. All of the alternatives in a wilderness stewardship plan must be consistent with the mandates in the Wilderness Act. (For Alaska wilderness areas, the alternatives also must be consistent with the provisions of the Alaska National Interest Lands Conservation Act.)

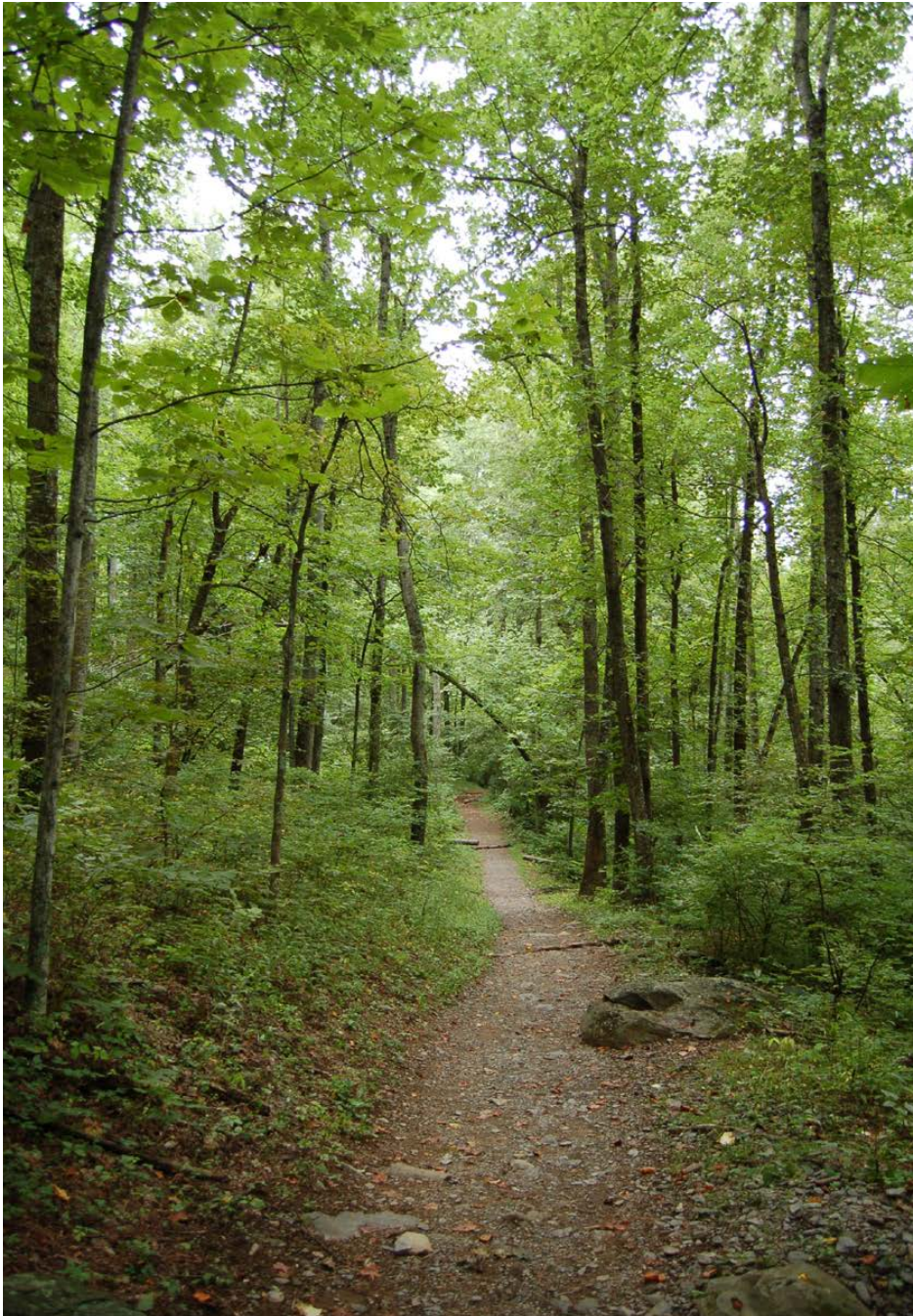
Reasonable alternatives are those alternatives that meet the purpose and need for action and are technically and economically feasible. *DOI NEPA regulations 46.420(c).*

A wilderness stewardship management plan will always consider and describe at least two alternatives: the “no action,” or current management, and the proposed action (NPS preferred alternative). As noted in the *Wilderness Stewardship Plan Handbook*, alternatives can be generated by the planning team and park staff, externally from public stakeholders, or a combination of both. The planning team needs to answer several questions in determining whether other alternatives need to be examined:

- Are there “reasonable,” valid alternatives to what the planning team is proposing?
- What level of detail should an alternative address (e.g., wilderness wide or site-specific)?
- Do potential conflicts exist for achieving different wilderness character qualities in the wilderness area or other goals for the wilderness area, or between different park stakeholders and wilderness users?
- Wilderness stewardship alternatives can be written to provide overall direction for a wilderness area as a whole *and* provide site-specific management direction when needed—wilderness stewardship plans can be both programmatic and site-specific in nature. How much a plan focuses on site-specific direction will depend on the issues and questions the plan needs to address and the impacts that need to be analyzed.

Alternatives may vary based on a number of factors, such as:

- access into the wilderness area
- facilities provided (trails, campsites) and/or locations of facilities
- visitor use management approaches
- type of visitor experience provided (e.g., degree of dispersion, self-reliance, levels of use, visible management presence, services provided)
- level/type/location of commercial guiding (e.g., guided day hiking, overnight backpacking, equestrian)
- type and/or configuration of management zones



Best Practices for Formulating Wilderness Stewardship Plan Alternatives

- Park planning NEPA documents generally have from two to four alternatives in addition to the no-action alternative. However, a wilderness stewardship plan usually will have only a couple alternatives. The number is not as important as ensuring that the document analyzes a full range of reasonable alternatives.
- Alternative management actions or strategies are organized around distinct management concepts.
- Alternatives should be fundamentally distinct and not just variations on a theme.
- Alternatives should not emphasize or sacrifice one wilderness character quality for another—all qualities should be protected overall in the wilderness. However, not all areas within a wilderness need to emphasize a wilderness character quality to the same degree—one area may emphasize opportunities for solitude while another part in the wilderness area may emphasize naturalness.
- Alternatives should not be contrived—alternatives should not follow the “Goldilocks Syndrome” of one alternative being “too hot” and another “too cold” with the preferred alternative being “just right.”
- You might not agree with all actions that comprise an alternative, but the alternatives need to allow the park staff to explore different directions proposed by the public (assuming they are consistent with the provisions of the Wilderness Act).
- The alternatives should be consistent with the actions in an adopted comprehensive or programmatic plan (e.g., general management plan), unless the alternatives are amending the comprehensive plan.
- Check to make sure all of the issues the plan is supposed to address are covered by the alternatives.
- Early in the process, reach agreement among all the preparers and reviewers of the plan on the appropriate level of detail the alternatives should provide.
- Avoid these traps in developing alternatives:
 - Being close minded about other valid alternatives and just focusing on the alternative the planning team sees as the preferred alternative.
 - Overloading the alternatives with too much detail, distracting attention away from the overall alternative concepts for management of the wilderness area.
 - Focusing just on current issues and pressures; not providing flexibility and nimbleness to address future issues that have not been thought of yet.
 - That existing infrastructure or management practices will not change.

Management Goals and Objectives

The “vision” in NPS planning is to establish goals and objectives for protecting the area’s wilderness character and the five wilderness character qualities, which ultimately guides park staff in maintaining and protecting the wilderness area. When resolving management issues, it is important not to lose sight of the “vision” for the wilderness area.

Goals and objectives are the basis of a wilderness stewardship plan, establishing the overall direction for the management of a park’s wilderness area. They help managers envision what the state of the wilderness should be in the future. Goals and objectives help paint a clear picture of what is to be achieved so managers can focus their management efforts—they define what to shoot for. (As the saying goes: “If you don’t know where you are going, then it doesn’t matter which road you take.”)

Management goals reflect broad intent, are more general, and are farther reaching, while objectives are usually more specific and have measurable outcomes.

As stated in the *Wilderness Stewardship Handbook*, it is up to a planning team to determine whether a single goal, multiple goals, or objectives are identified—“do whatever is most effective for managing a particular wilderness.” For example, goals may be identified for each wilderness character quality. Goals and objectives should be achieved to a large degree in all of the alternatives considered in a wilderness stewardship plan; however, how they are achieved may vary from alternative to alternative.

Examples of wilderness area goals can be found in the Petrified Forest, Sequoia-Kings Canyon, and Death Valley wilderness stewardship plans.

Best Practices for Identifying and Applying Goals and Objectives

- Do not get hung up on terminology trying to distinguish what is a goal versus an objective. The important point is they lay out the broad, general direction you want to achieve under all of the alternatives.
- If there is a potential difference in what condition is to be achieved, even if it’s a small difference, then this belongs in the alternatives section, not in the goals and objectives section. Specific actions also do not belong here—beware of calling a management action a goal or an objective.
- Goals should be realistic and feasible although they may take a long period of time to achieve.
- As broad high-level statements, goals provide managers the flexibility to respond to changing conditions by employing a range of discretionary actions. They do not narrowly restrict appropriate management actions or responses.
- Goals and objectives should reflect the best available information from experts and the latest knowledge on best management practices.
- It is not necessary, or even necessarily desirable, to be quantitative at this stage of planning. Terms like relatively large or small, dispersed, moderate, relatively high- or low-density may be used to provide NPS staff with appropriate and adequate guidance.
- Because ecosystems are dynamic and we know very little about how natural systems function and because current conditions typically do not meet our picture of desired conditions, rather than define a “desired condition” for topics involving natural processes, it is better to describe how much human interference is acceptable to achieve other goals.

Alternative Management Concepts

Preservation of wilderness character should be the primary consideration in structuring alternatives and should remain an integral part of the underlying concept of appropriate wilderness stewardship. Management concepts should make a convincing case for the kind of place the wilderness area should be, considering all of the wilderness character qualities, and desired resource conditions, visitor experiences, and facilities (if needed and appropriate). Concepts can also guide how a planning team zones the wilderness area.

A key to creating good alternatives is to come up with alternative management concepts that people can agree are reasonable. This criterion tends to eliminate the “extreme” visions for wilderness management and use that do not realistically consider the range of stakeholder interests in wilderness areas. Management concepts can allow for a number of stakeholder interests while expressing a rationale for why and how those interests are combined in a certain way.

Best Practices for Developing Alternative Management Concepts

- Management concepts should be understandable and succinct. They should eloquently and persuasively describe the type of place the wilderness area should be.
- Stakeholders should be able to find portions of one or more alternatives that reflect at least some of their views about the kind of place the wilderness area should be (provided the stakeholders’ views are consistent with maintaining the area’s wilderness character and assuming the use is appropriate).
- Avoid alternative concepts that emphasize one wilderness character quality over another for the wilderness area as a whole.
- Avoid alternative concepts that focus solely on maximum resource protection or maximum visitor enjoyment. These concepts lie at opposite ends of a continuum and are not realistic.
- Ensure differences among alternative concepts are easy to discern and evaluate.
- In addition to the “no-action” alternative, develop no more than three new alternative management concepts if possible, so readers can readily comprehend the concepts.



Wilderness Zoning

There is not just one desired condition for wilderness. Because most wilderness areas are not homogeneous in their wilderness character, zoning is a way of managing to preserve and enhance a spectrum of qualities in a given wilderness, including preserving the most pristine areas. Wilderness can be managed as one single management zone, or if the planning team decides that an area should be managed differently in different areas or different seasons, the wilderness area can be zoned spatially and/or temporally.

Zoning is an accepted, well-established planning and management tool that has been effectively used in wilderness stewardship. NPS *Management Policies 2006* (§6.3.4.2) states wilderness management plans “. . . will identify desired future conditions, as well as establish indicators, standards, conditions, and thresholds beyond which management actions will be taken to reduce human impacts on wilderness resources.” Zoning is typically used to achieve this requirement. The policies further state, “When necessary, all categories of wilderness may be zoned for visitor experiences and resource conditions consistent with their wilderness values within the established management zoning system for each park. However, management zoning. . . cannot and will not diminish or reduce the maximum protection to be afforded lands with wilderness values. . . [N]o transitional or “buffer” zones are appropriate within wilderness boundaries” (§6.3.4.1). In summary, all wilderness zones should protect and maintain wilderness resources and wilderness character, but they may differ in the way in which they maintain all of the individual wilderness character qualities in specific areas.

Note: where possible, all wilderness zones should be consistent with the zones identified in a park’s general management plan. However, in some cases, such as for parks that do not have a general management plan or the plan is no longer current, the wilderness stewardship plan may need to establish new zones for a wilderness area, and thus would amend the general management plan. To avoid amending a general management plan’s zones, a planning team could also consider creating and applying subzones within the general management plan’s zones.

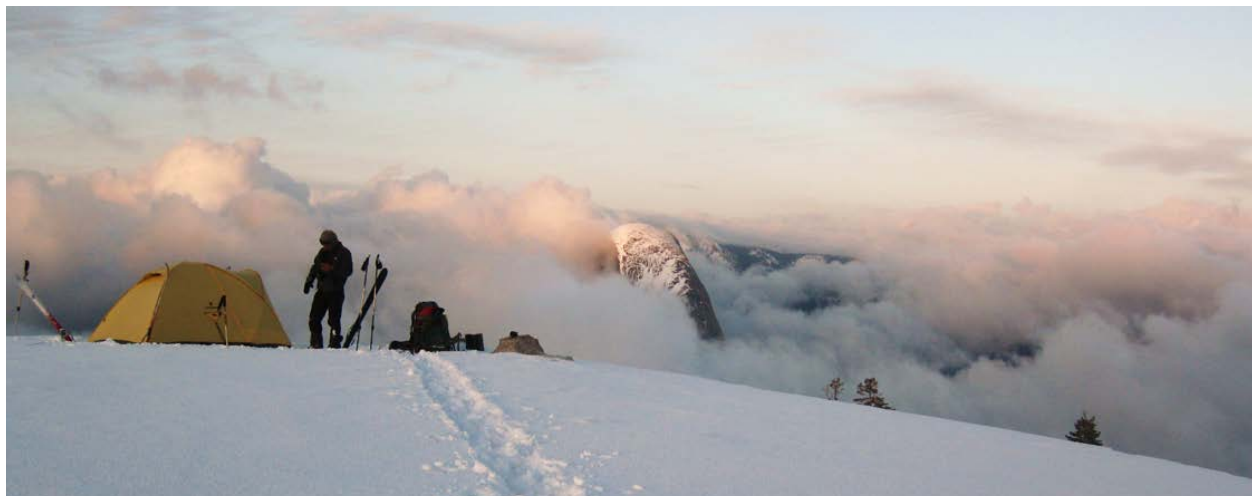
Desired conditions should be described for the zones. Desired conditions in this context are potentially measurable descriptions of wilderness conditions to be achieved in the future (in terms of physical/biological conditions, natural processes, wilderness experiences, and level of management). Basically, the descriptions should paint a picture of what conditions will result from effective management and proper human use. Desired conditions are expressed in terms that describe intent, and thus are not necessarily attainable in the near future—they do not necessarily reflect existing conditions but rather reflect ideal conditions. Desired conditions can be developed for each wilderness character quality, including desired conditions for natural resource conditions, opportunities for solitude and primitive, unconfined recreation, appropriate kinds and levels of management and access, appropriate levels of development (which in the case of wilderness should be minimal), and other features of value. Depending on the park’s issues, desired conditions may also be identified in zones for specific management topics (e.g., natural fire regime, cultural resources, spectrum of trail conditions).

In addition to describing desired conditions, indicators, measures, and standards should be identified for the zones. Examples of management actions may also be included in the zone descriptions.

There are two different ways to develop and apply zones in a wilderness area. One way is to create zones and then allocate the zones across the wilderness area. The zone descriptions in this case do not vary between the alternatives, but their distribution on the ground may vary by alternative. The other approach is to divide the wilderness land base into logical relatively homogeneous areas of wilderness character and then decide how each of these subareas would be managed. In this case, the zone descriptions vary by alternative, but the distribution of the zones on the ground does not vary by alternative. (For more details on these approaches, see the NPS *Wilderness Stewardship Planning Handbook*.)

Best Practices for Developing and Applying Wilderness Management Zones

- All wilderness zones must meet or exceed all requirements to comply with the Wilderness Act. All zones must comply with NPS policy for managing wilderness and need to reflect the distinction between wilderness resources and other backcountry resources.
- The zones should address all five qualities of wilderness character.
- All wilderness zones, including the desired conditions within the zones and the configuration of zones applied on the ground, should be aimed at maintaining or improving wilderness character qualities, and be consistent with the alternative management concept.
- The zones should be sufficiently different so that managers can easily distinguish what the difference(s) are—the differences in the management zones should be meaningful to park managers and understandable to all stakeholders.
- Zones may be assigned in a “no-action” alternative when previous planning efforts included zoning of the area. If no zones have been applied in past planning efforts, then the area should not be zoned.
- Management zoning is a prescriptive process that specifies desired conditions. Areas should not be zoned to reflect current conditions, but rather to reflect the future desired state. For example, an area may currently receive a high level of use, with few opportunities for solitude, but it may be zoned for a different desired condition—e.g., lower use levels (temporally or spatially) with increased opportunities for solitude. Beware of locking current conditions in through zoning. Desired condition descriptions should reflect current conditions only where there is agreement that there are no problems with current conditions and these conditions are desired in the future.
- Be careful in selecting a name for zone. Some zone titles can create confusion in communicating the zone’s overall concept. Sometimes it may be better to use numbers rather than titles (e.g., class 1, 2, and 3).
- In applying the zones on the ground, make sure the entire wilderness area is covered by the zones. As much as possible, the boundaries of a zone should be sited at geographically apparent locations so park staff can easily distinguish where the zones are.
- Avoid including incompatible conditions and experiences in the same zone.
- Limit the number of zones that are applied in a wilderness area. As a rule of thumb, no more than three different zones should be applied in a wilderness area. In general, the greater the diversity in the biophysical resources and human uses, and the greater the variety in the condition of the resource and its uses, the more zones may be likely. However, assigning a maximum number of zones may be appropriate—particularly in large and highly diverse wilderness areas.



Actions Common to All Alternatives

Management actions can vary by zone or by alternative. However, not all management actions lend themselves to varying by alternatives—some actions may be the same for all alternatives. These are actions that are considered practical, common sense approaches to wilderness management. They would be implemented through the wilderness stewardship plan regardless of which alternative is selected. The “common to all” actions lay the groundwork for long-term, comprehensive decision-making, helping to avoid the tendency for reactive management. They prescribe a minimum, consistent level of management that protects the wilderness area’s character. In some cases these actions may be applicable to all of the alternatives except for the no-action alternative; in other cases they may be applicable to all of the alternatives including the no-action alternative.

The actions included in this section will vary from wilderness area to wilderness area. They often include application of the minimum requirements concept, visitor capacity, and implementation of a wilderness character monitoring framework. Other topics included here are administrative / operational tasks and processes that are needed to gain efficiency and accountability in wilderness stewardship operations. Examples of such topics might include wilderness use allocation and permit systems; scientific research; commercial use; wilderness education and interpretation; aviation; administrative communications in wilderness; administrative activities in wilderness; winter use management; development of more detailed management plans (e.g., a trails management plan); cooperative management of jointly managed wilderness areas; relations with private and public organizations and governmental agencies; accessibility; wilderness patrols and law enforcement; and emergency services.

Best Practices for Actions Common to All Alternatives

- Be sure to distinguish whether an action is common to all of the action alternatives, or to all of the action alternatives and the no-action alternative.
- Be sure these actions are consistent with all of the alternative concept statements and will not vary between alternatives.
- “Common to all” actions are not to be confused with mitigation measures, which are used to lessen or avoid the impact of certain management actions.
- If the action applies to the “no-action” alternative, use “would continue” in the description of the action.

Wilderness Character Monitoring and Standards

One other topic a wilderness stewardship plan should address is starting or continuing a wilderness character monitoring framework. A park’s wilderness character assessment should have identified the indicators and measures that are going to be monitored and created a monitoring framework. This is a key action that needs to be implemented in order for park staff to determine the status and trends of the area’s wilderness character. The monitoring framework can be revisited in a wilderness stewardship plan. Measures for the indicators are subject to park identification, for example, and can be adjusted for appropriate selection as necessary. If no changes are needed, the framework can be referenced and adopted in the plan, typically in the common to all alternatives section.

Wilderness character standards are the *minimum* acceptable condition for measures and they serve as triggers for management actions. Standards should be identified for all of the wilderness character qualities, either wilderness-wide or by zone, in a wilderness stewardship plan. Typically they do not vary between alternatives and can be included in the common to all actions section. (However, as noted in the *Wilderness Stewardship Plan Handbook*, standards can vary by alternative or management zone—although one would not expect the standards to vary too much because otherwise there would be questions on when a wilderness character quality is being significantly degraded. If standards do vary by alternative, they should be addressed in the descriptions of each of the alternatives.)

Potential management strategies or actions that may be taken if standards are exceeded likewise may be identified in this section; however, if they vary by alternative, the actions should be included in the descriptions of the alternatives. It is recommended that a range of possible management actions progress from least restrictive

or intrusive to more restrictive or intrusive. Be aware that taking an action to preserve one or more qualities of wilderness character often adversely affects the other qualities. Also, note that additional NEPA compliance may be needed before some of these actions can be taken.

Best Practices for Wilderness Character Monitoring and Standards

- Review the measures in the wilderness character assessment and ensure that the park staff will be able to monitor all of them. Determine if the measures need to be revised or additional measures added based on actions in the plan.
- It is extremely important that the wording of measures and standards be carefully crafted. Changing just a few words in a standard can have major repercussions.
- Visitor use monitoring is typically integrated with wilderness character monitoring. However, in some cases there may be a need to monitor visitor use that is not related to wilderness character. For example, in some parks there may be a need to monitor for visitor health and safety, which would not fall under wilderness character monitoring. For more information, please reference best practices developed by the Interagency Visitor Use Management Council (IVUMC): <https://visitorusemanagement.nps.gov/>
- Standards are informed by science, but recognize that establishing standards is a value-based management choice that is linked to maintaining an area's wilderness character. In setting standards, use information from scientists, managers, planners, and the public. Consider also the degree of rigor and reliability that is needed by the park in setting standards. Be sure to document the rationale for selecting the standards.
- A planning team may be tempted to accept existing resource and visitor experience conditions as standards. Standards can reflect existing conditions, but this judgment should be made only after careful thought and assurance that existing conditions represent agency and public visions for the future of the wilderness area.
- Adopt existing applicable measures and standards when appropriate. A park may have a set of desired conditions, measures standards, and management actions in another plan that may be relevant to wilderness character and can be adopted or adapted.
- Remember that standards are related to desired conditions, but they are not the same thing: standards are the minimum acceptable condition and are the low end of a desired condition—they are not the goal park managers are striving to achieve.
- Quantitative standards for the wilderness character qualities are usually preferable from a monitoring standpoint, however qualitative standards that are supported by legitimate social science may be of particular applicability to the solitude quality.
- Standards should have other characteristics: they should have temporal or spatial qualifiers, often be expressed as a probability to include tolerance for random or unusual events, be focused and relevant to issues and concerns, and be realistic.

Visitor Capacity

NPS *Management Policies 2006* (§8.2.1) defines visitor carrying capacity as “the type and level of visitor use that can be accommodated while sustaining the desired resource and visitor experience conditions in the park.” The policy further states “superintendents will identify visitor carrying capacities for managing public uses.” A wilderness stewardship plan may address the area's visitor capacity, as it affects opportunities for solitude or a primitive and unconfined recreation experience, and may affect the natural and other features of value qualities. However, the level of detail the plan goes into this topic will depend on the wilderness area and will vary from area to area. Keep in mind that a wilderness area's visitor capacity is typically common to all alternatives, but it could differ from alternative to alternative depending on a variety of factors (e.g., desired conditions, zoning, infrastructure, types of use). The Sequoia and Kings Canyon Wilderness Stewardship Plan and the Merced River Wild and Scenic River Comprehensive Management Plan are examples of plans that addressed visitor capacity in wilderness areas in detail. For additional information on this topic, see the references at the end of this section.

Management Actions

There are many possible management actions that could be identified in a wilderness stewardship plan, which will often vary from wilderness area to wilderness area, and which may vary between alternatives for a given wilderness area, or which may be worth describing in the “common to all alternatives” section of the plan. Actions also may vary by zone. Many wilderness management actions will not vary between the alternatives and can be included in the “common to all alternatives” section.

The potential management actions generally fall into the following categories: natural and cultural resource management; visitor use management; facilities; and administration. Often, visitor use related topics will be a focus of the alternatives of a wilderness stewardship plan. The following list identifies topics that are commonly addressed in wilderness stewardship plans. The list is not intended to be a comprehensive list of all the topics all wilderness stewardship plans address. (See also appendix 4 in the *Wilderness Stewardship Plan Handbook* for a longer list of possible topics.)

A. Resource Management

- natural resources (e.g., appropriate restoration activities, invasive species management, climate change)
- cultural resources
- fire management
- visitor impacts (e.g., human waste management)

B. Visitor Use Management

- visitor experiences
- visitor user capacity
- permit and allocation systems
- Leave No Trace outdoor ethics
- accessibility for people with disabilities
- pets
- climbing and mountaineering protocols
- stock use
- emerging uses and technology
- interpretation and education
- risk management and safety (including law enforcement and search and rescue coordination)

C. Visitor Access and Facilities

- trails and trailheads
- campsites
- shelters

D. Commercial Services

- extent necessary determinations

E. Other Wilderness Uses

- scientific activities and research
- hunting and trapping
- subsistence uses
- American Indian rights

A. Administrative Considerations

- administrative facilities
- minimum requirements
- relations with private and public organizations and government agencies

B. Other Topics

- special events
- memorialization
- wilderness boundary

Best Practices for Developing Management Actions

- It is not necessary to identify all of the day-to-day management actions that occur in a wilderness area in a wilderness stewardship plan. The plan needs to stay tightly focused on those topics most important to preserving wilderness character.
- The plan may cite and reference NPS management policies and guidance in DO 41 and RM 41 where appropriate, but it generally should not include the policies and guidance as management actions. Management actions included in the plan should be as specific as possible to the specific wilderness area, translating policy and guidance into actions that field staff will be implementing.
- Professional judgment is needed to determine which management actions should be included in the alternatives, in “common to all alternatives,” or not covered. A number of factors should be considered in this deliberation, such as the importance of the topic (e.g., is it key in this wilderness area for protecting a wilderness character quality?), level of controversy, complexity, potential for differing interpretations of what action to take, frequency the action is needed, if the action is wilderness-wide or site-specific, and cost considerations.
- References have been developed that relate to monitoring of wilderness character qualities and also for visitor use management (see “Keeping it Wild in the National Park Service” and the Interagency Visitor Use Management Council’s “Visitor Use Management Framework.” These references provide direction that can be integrated for purposes of developing monitoring guidance in a wilderness stewardship plan.

Other Elements of the Alternatives

Costs and Staffing Levels. All actions in an alternative have an associated cost in terms of dollars and staff time.⁵ For an alternative to be feasible, it must not be too costly and require many more staff to implement. Like all NPS actions, wilderness management actions must be developed in a fiscally responsible manner. Cost and staffing estimates are important to decision makers as a key factor in identifying the preferred alternative. Decision makers and the public need to have an overall picture of the estimated costs of the alternatives, including the no-action alternative, to make wise decisions and determine feasibility within the planning process. Planning teams need to remember that any significant proposed increase in costs or staffing will attract a high level of scrutiny from NPS managers and must have a good justification if they are to be approved.

In estimating costs of implementing an alternative, a variety of different recurring and non-recurring costs should be considered. Recurring costs, or annual operating costs, include such topics as the cost of staffing (FTEs), wilderness patrols, and facility maintenance. Non-recurring costs include such topics as capital improvements (e.g., construction of a new trail) and one-time restoration actions. In identifying costs, the planning team also should consider potential funding sources to pay for any new actions. Likewise, for identified staffing additions give thought to the staff roles, responsibilities, and time devoted to wilderness stewardship.

⁵ Costs are not required for NEPA. However, they are briefly addressed in this toolkit for practical planning considerations related to staff time and capacity to manage wilderness resources.

Best Practices for Estimating Costs and Staffing Levels

- Remember to include costs of the actions for each of the alternatives. Be sure to include costs and staff for wilderness character monitoring. This is an important cost that is often overlooked.
- The total cost of facility ownership (lifecycle cost) should be identified for all new infrastructure. (Facilities management staff can be helpful in developing these costs.)
- In identifying costs consider all of the park staff's contributions in implementing each action (e.g., resource protection, law enforcement, interpretation, facility management).
- Costs and staffing are always important factors in developing alternatives, but remember they are not always the most important factor in identifying a preferred alternative—sometimes costs may be secondary (within limits) to actions needed to maintain and protect the wilderness character of an area.

Mitigation Measures. Although technically not part of the alternatives, mitigation measures are closely connected with the alternatives. Mitigation measures are practical and appropriate methods that would be used under the action alternatives to avoid or minimize harm to wilderness character and other impact topics. These measures are developed using existing laws and regulations, best management practices, conservation measures, and other known techniques. Mitigation should be incorporated into the alternatives to the extent the National Park Service is able, rather than adding mitigation later on in the implementation process.

A wilderness stewardship plan/environmental impact statement or environmental assessment often includes mitigation measures for impacts to wilderness character. Relevant, reasonable mitigation measures that could improve the wilderness resource should be identified. These measures are usually listed at the end of the alternatives chapter so that impacts are evaluated based on the mitigated alternatives. In analyzing environmental impacts, it is assumed that proposed mitigation measures would be followed.

Some mitigation measures may be specific to one alternative, while others may apply to all of the action alternatives.

An important caution should be kept in mind when identifying mitigation measures in an environmental impact statement or environmental assessment. Both Records of Decisions and Findings of No Significant Impact must identify the mitigation measures that will be implemented along with the selected alternative. Therefore, it is important that the agency consider budgetary projections when making this commitment. In other words, a planning team should only include a mitigation measure if it is going to be implemented by a park staff. If a mitigation measure were identified but not followed, it could call into question the validity of the environmental analysis, possibly requiring an additional NEPA document.

Note that special considerations apply to mitigation measures to avoid adverse effects to cultural resources and to federally listed threatened and endangered species.

Best Practices for Developing Mitigation Measures

- Mitigation should be incorporated into the alternatives to the extent the National Park Service is able, rather than adding mitigation later on in the implementation process.
- Be sure the National Park Service has the authority to carry out the measures and there is a reasonable expectation of having the staff and funding to perform the mitigation measure and monitor its effectiveness. Can the park staff fully commit to implementing each of the mitigation measures that are being proposed?
- Check to make sure that the mitigation measures being proposed are reasonable, effective, and feasible ways to reduce, eliminate, or avoid impacts to the wilderness character qualities and other affected resources and visitors.
- Mitigation measures should not just cite NPS policies, but rather provide specific actions that can be taken to avoid or minimize negative impacts of the alternatives.
- Inventories, monitoring, and consultation are important actions that can help avoid negative impacts to resources, but they are generally not included in a list of mitigation measures.

Other Implementation Considerations. A wilderness stewardship plan should consider a set of strategies to ensure effective implementation of the plan. The *Wilderness Stewardship Plan Handbook* provides a number of strategies that may be included in a plan.

Alternatives Considered but Dismissed

While reviewing the range of reasonable alternatives and management concepts in the alternatives development process, it may become evident that certain alternatives are not appropriate to analyze fully in the environmental assessment or environmental impact statement. Certain alternatives can sometimes be considered but eliminated from further study for a variety of reasons. Dismissed alternatives should be limited to those that were initially thought to be viable or suggested by the public, but later rejected. Reasoning for dismissal must be documented in the wilderness stewardship plan. According to the NPS Director’s Order 12 Handbook, reasons to eliminate alternatives include:

- technical or economic infeasibility—this means the alternative could not be implemented if it were selected or would be unreasonably expensive.
- inability to resolve the purpose and need for taking action.
- duplication with other, less environmentally damaging or less expensive alternatives.
- the alternative conflicts with an up-to-date and valid park plan, statement of purpose and significance, or other policy, such that a major change in the plan or policy would be needed.
- the alternative would require a major change to a law, regulation, or policy.
- too great of an environmental impact.
- the alternative addresses issues beyond the scope of the NEPA review.

Alternatives that are inconsistent with the Wilderness Act or NPS management policies, for example, may be considered in a wilderness stewardship planning process, but in most cases would be dismissed. Above all, when eliminating an alternative from detailed analysis, be sure the planning team can explain why it is eliminating it. If the team dismisses specific alternative elements, consider including those in the description of alternatives considered but dismissed as well. However, the project team does not need to dismiss every management concept that is considered throughout the process in the NEPA document itself, as long as the plan’s decision file reflects those additional concepts that were considered.

Best Practices for Dismissing Alternatives

- “Reasonable alternatives” are those that are economically and technically feasible and show evidence of common sense.
- While it is not appropriate to generate weak or infeasible alternatives, the planning team should not pare down the list of alternatives to only those that are cheap, easy, or simply the park’s favorite way of managing the wilderness.
- Provide brief, clear documentation in the environmental assessment or environmental impact statement of the reasons for dismissing an alternative.

Sources of Additional Information

Interagency Visitor Use Management Council

2016 *Visitor Use Management Framework. A Guide to Providing Sustainable Outdoor Recreation* http://visitorusemanagement.nps.gov/Content/documents/lowres_VUM%20Framework_Edition%201_IVUMC.pdf

- Management actions (visitor use): pp. 34-38, 46-49

National Park Service

2015 *NPS NEPA Handbook* https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf

- Developing alternatives: pp. 52-57
- Alternatives considered and dismissed: p. 54
- Mitigation measures: p. 58

2014 *Wilderness Stewardship Plan Handbook. Planning to Preserve Wilderness Character.* https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm

- Developing alternatives: p. 41, 45-46, 62-63
- Management concepts: pp. 41, 45-46
- Actions common to all alternatives: pp. 41,45-46
- Zoning: pp. 42-44
- Management actions: pp. 30-41, 45-46, 62, 87-115
- Mitigation measures: p.64
- Implementation considerations: p. 50
- Alternatives considered but dismissed: p. 63

2014 *Keeping it Wild in the National Park Service. A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring.* http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf

- Management actions: pp. 72-74, 80-92
- Actions common to all alternatives: pp. 80-92

2008 *General Management Planning Dynamic Sourcebook* <http://share.inside.nps.gov/sites/WASO/PPFL/PSS/GMP/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2F-WASO%2FPPFL%2FPSS%2FGMP%2FShared%20Documents%2FWASO&FolderC-TID=0x01200033265CA3871B064299A2CAAE3F47AC9C&View=%7B13F1F347-4D33-408E-8FCD-B2844DA46B8E%7D>

- Developing alternatives: pp. 7-1 to 7-41
- Management concepts: pp. 7-20 to 7-21
- Zoning: pp. 7-22 to 7-35
- Mitigation measures: pp. 10-8 to 10-9, and Appendix I.3
- Costs of alternatives: pp. 9-1 to 9-9

Outdoor Skills and Ethics Reference

Leave No Trace Center for Outdoor Ethics: <https://lnt.org/>

Visitor Carrying Capacity and Wilderness References

Cole, D., and T. Carlson

- 2010 “Numerical Visitor Capacity: A Guide to Its Use in Wilderness.” Gen. Tech. Rep. RMRS-GTR-247. US Forest Service, Rocky Mountain Research Station. <http://www.treesearch.fs.fed.us/pubs/37213>

Interagency Visitor Use Management Council

- 2017 Interagency Visitor Use Management Council. *Visitor Capacity Guidebook*. [<http://visitorusemanagement.nps.gov/VUM/WhatGuidesIt>]
- 2016 *Visitor Use Management Framework. A Guide to Providing Sustainable Outdoor Recreation*. http://visitorusemanagement.nps.gov/Content/documents/lowres_VUM%20FrameworkEdition%201_IVUMC.pdf
- Identifying visitor capacities: pp. 50-555.

National Park Service

- 2015 *Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan / EIS*. Appendix A. <https://parkplanning.nps.gov/projectHome.cfm?projectID=33225>
- 2014 *Merced Wild and Scenic River Final Comprehensive Management Plan/EIS*. (Volume 1, Chapter 6, Segments 1, 5 and 8) <https://parkplanning.nps.gov/document.cfm?parkID=347&projectID=18982&documentID=57526>

Wilderness Character Monitoring, Setting Standards, and Potential Management Action References

National Park Service

- 2014 *NPS Wilderness Stewardship Plan Handbook* https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm
- Wilderness character monitoring and selecting standards: pp. 30-39.
 - Indicators, measures and NPS data sources for the qualities of wilderness character: Appendix 5, pp. 116-121.
 - Management actions if standards are exceeded: pp. 37-39.
- 2014 *Keeping it Wild in the National Park Service* http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf
- Identifying and prioritizing measures: pp.102-109, 194-208
 - Dealing with a downward trend in wilderness character: pp. 116-117.

2014 *Jimbilnan, Pinto Valley, Black Canyon, Eldorado, Ireteba Peaks, Nellis Wash, Spirit Mountain, and Bridge Canyon Wilderness Areas Wilderness Management Plan / EIS* (Lake Mead NRA 2014) <https://parkplanning.nps.gov/projectHome.cfm?projectID=16820>

- Wilderness character monitoring and standards: pp. 103-116.

2013 *Petrified Forest National Park Wilderness Stewardship Plan / EA* <https://www.nps.gov/pefo/learn/management/upload/PEFO-Wilderness-Stewardship-Plan-Environmental-Assessment.pdf>

- Wilderness character monitoring and standards: pp. 50 - 65

US Forest Service

2015 *Keeping it Wild 2. An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System* http://www.fs.fed.us/rm/pubs/rmrs_gtr340.pdf

Wilderness Vision References

Interagency Wilderness Policy Council

2016 *2020 Vision: Draft Implementation Plan.*

<https://parkplanning.nps.gov/document.cfm?parkID=442&projectID=64374&documentID=73205>

2014 *2020 Vision: Interagency stewardship priorities for America's National Wilderness Preservation System.*

<https://www.nps.gov/orgs/1981/wilderness-2020.htm>

Zoning References

Arthur Carhart National Wilderness Training Center, Wilderness Stewardship Planning Framework course: module 7, Zoning Wilderness. http://dev.eppley.org/carhart_wspf/u7.php

Cole, D.N. and T.E. Hall

2005 "Wilderness Zoning: Should We Purposely Manage to Different Standards?" *2005 George Wright Society Conference Proceedings*. <http://leopold.wilderness.net/pubs/578.pdf>

Dawson, Chad P. and John C. Hendee

2009 *Wilderness Management. Stewardship and Protection of Resources and Values*. 4th edition. Fulcrum Publishing, Golden, CO. Pages: 209-210.

Haas, G.E., B.L. Driver, PJ. Brown, and R.G. Lucas

1987 "Wilderness Management Zoning." *J. of Forestry* 85(2): 17-21. http://www.wilderness.net/leopold/pubsResults_noheader.cfm?searchType=Publication&Pub=171

Component 5. Identification of the Preferred Alternative

“The richest values of the wilderness lie not in the days of Daniel Boone, nor even in the present, but rather in the future.” – Aldo Leopold

A preferred alternative is the alternative that the National Park Service determines “would best accomplish the purpose and need of the proposed action while fulfilling its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors” (43 CFR 46.420(d)). In the case of a wilderness stewardship plan, the preferred alternative should be the one that best preserves wilderness character and best fulfills the other goals and objectives of the plan.

The NPS *NEPA Handbook* states that structured decision-making processes, such as “choosing by advantages,” should not be relied on to identify a preferred alternative. There is no one way to identify a preferred alternative—identification is up to the planning team and the superintendent, who decides whether or not to adopt the planning team’s recommendation or recommend a different alternative to the regional director.

A preliminary analysis of potential impacts is typically done as one step leading up to the identification of the preferred alternative. The analysis can be done in the form of a table, with bullets, identifying general effects. The focus of the preliminary analysis should be on the five qualities of wilderness character. A bottom-line determination should be provided on the overall effect of each alternative on wilderness character and a comparison of how well each alternative does in protecting wilderness character (e.g., this alternative best protects the area’s wilderness character compared to current conditions.) The effects of the alternatives on other key resources and on visitors in the wilderness area should be identified as well.

Other factors should be considered in identifying a preferred alternative. The following questions may be considered in the analysis:

- Which alternative best meets the purpose and need for taking action?
- Which alternative best meets the requirements of the Wilderness Act and NPS statutory mission and responsibility?
- Which alternative has the fewest environmental impacts?
- Which alternative is most feasible to implement, as far as cost and personnel constraints?
- Which alternative is most supported by members of the public and other stakeholders and why? And, which alternative is most opposed by stakeholders and why?

Other questions that may assist the team in identifying a preferred alternative include:

- What wilderness values are dominant in this area?
- How does the alternative preserve the unique character of this wilderness?
- Which wilderness user groups are affected and how does the alternative facilitate or restrict use?
- How does the alternative fit into the regional or national context?

The *Death Valley Wilderness and Backcountry Stewardship Plan* used the following criteria in identifying a preferred alternative. Each alternative was evaluated in how well it achieved these criteria:

- Meets the plan’s purpose and need.
- Meets the goals of the plan.
- Minimizes negative impacts to park resources and visitors.
- Maximizes positive impacts to park resources and visitors.
- Is feasible to implement within 20 years.
- Anticipates future needs.
- Addresses existing visitor issues identified in scoping.
- Addresses existing resource issues identified in scoping.
- Addresses existing administrative issues identified in scoping.

Best Practices for Developing the Preferred Alternative

- Consider the effects of the alternatives on all the qualities of wilderness character and then synthesize and integrate them into an overall conclusion on the effect on wilderness character.
- If a wilderness extends beyond a park boundary, consult with the neighboring land management agency on the effects and the identification of the preferred alternative (must be a joint-lead NEPA document and the NPS Regional Director retains the authority to select a preferred alternative).
- Be sure to discuss and document the rationale for identifying the preferred alternative. Although this rationale will not be included in the EA/EIS, it will be needed for the decision document (FONSI/ROD).
- Remember at all times to state in the NEPA document the preferred alternative is being identified by the team. We are not selecting the preferred alternative (which occurs in the decision document).
- Remember also that the NPS preferred alternative is not necessarily the same as the environmentally preferable alternative—the agency can select as its preferred alternative an alternative that is not the environmentally preferable alternative,⁶ although there should be a good defensible rationale if this is the case.

Sources of Additional Information

Arthur Carhart National Wilderness Training Center’s wilderness stewardship planning framework online course module 8 (http://dev.eppley.org/carhart_wspf/u8t10.php)

NPS Wilderness Stewardship Plan Handbook, p. 48 http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf

NPS NEPA Handbook, pp. 56-57
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf

NPS NEPA Handbook Supplemental Guidance, “Identifying a Preferred Alternative” (https://www.nps.gov/orgs/1812/upload/SupplementalGuidance_Identifying-a-Preferred-Alternative_9-2015_Final.pdf)

⁶ The National Park Service needs only to identify an environmentally preferable alternative in a Record of Decision.

Component 6. Compliance Requirements

“The only thing we know for sure about the future is that it will be radically different from the past. In face of this enormous uncertainty, the least we can for future generations is to pass on as many of the planet’s resources as possible.” - Norman Myers (Author of The Sinking Ark)

Selecting the Appropriate NEPA Pathway (Environmental Assessment / Environmental Impact Statement)

The National Park Service uses four pathways, or levels of analysis and documentation, to comply with the National Environmental Policy Act. The two pathways that apply to wilderness stewardship plans are the environmental assessment or environmental impact statement. In most cases, an environmental assessment is the appropriate NEPA pathway. However, some extenuating circumstances may require development of an environmental impact statement. The appropriate NEPA pathway will be determined once a better understanding of the issues and the impacts associated with the actions is made.

The environmental assessment applies to a variety of stewardship scenarios. Although an environmental assessment was originally envisioned as a tool for determining whether to prepare an environmental impact statement and is still used this way in some instances, in most cases the environmental assessment has become a distinct pathway. An environmental assessment is a means for documenting compliance with NEPA and assisting in the planning and decision-making process when an environmental impact statement is not necessary. Essentially, an environmental assessment is used to assess a proposed action that is unlikely to result in significant environmental impacts. An environmental assessment is meant to be a concise document at a level of detail limited to what is necessary to demonstrate the proposal would not result in significant environmental impacts. It should be kept brief by:

- carefully developing the scope to identify pivotal issues
- focusing discussions and analysis on the relevant issues, and dismissing issues that are not meaningful to the decision
- discussing impacts in proportion to their importance
- using tiering and incorporation by reference techniques, when appropriate, to minimize bulk

An environmental impact statement, on the other hand, is intended to provide a detailed written statement on the environmental impacts of major actions that have potential to significantly affect the environment. Its fundamental purpose is to include detailed consideration and disclosure of the environmental costs and benefits of a proposal. An environmental impact statement is often the appropriate NEPA pathway when there is a high degree of controversy over the environmental impacts of a proposed action. Because of the protective statutory language in the Wilderness Act (related to preserving wilderness character and restricting permanent human improvements and motorized equipment), wilderness stewardship activities won’t typically require an environmental impact statement; however, there are several examples of NPS wilderness plans that have been prepared as environmental impact statements.

Best Practices for Selecting the Appropriate NEPA Pathway

- In most cases, an environmental assessment is the appropriate NEPA pathway. However, extenuating circumstances may require development of an environmental impact statement. The appropriate NEPA pathway will be determined once a better understanding of the issues and the impacts associated with the actions is made.
- If the planning team can document there is no potential for significant adverse impacts as a result of implementing stewardship activities, the team should prepare an environmental assessment.
- For environmental assessments and environmental impact statements, carefully develop the scope to discuss key issues and dismiss those that are not meaningful to the decision.
- The length of an environmental assessment should be sufficient to demonstrate the planning team has taken a hard look at the environmental impacts of the proposed action and any alternatives.
- Consider the context and weigh the intensity of the proposed action to determine if an environmental assessment or environmental impact statement should be prepared for the wilderness stewardship plan.

NPS NEPA Requirement Considerations

For actions occurring in any category of wilderness (designated, proposed, recommended, and eligible), the wilderness stewardship planning team must determine the potential effect on wilderness character. Addressing impacts to wilderness character is tracked throughout the NEPA process, including scoping, selecting impact topics, developing the affected environment, alternatives, and environmental consequences sections of the environmental assessment or environmental impact statement, and in the identification of the NPS preferred alternative. *Wilderness Character Qualities must be identified in the NEPA document's affected environment section and analyzed in the environmental consequences section.*

The plan's ability to preserve wilderness character is also documented in the decision document. NPS Director's Order 12 and the NPS *NEPA Handbook* provide comprehensive guidance on NEPA requirements. The following sections of this toolkit focus on how to assess impacts to wilderness character; the public's role in post-scoping involvement and plan development; and how the NEPA decision document is developed for a wilderness stewardship plan.

Selecting Impact Topics. For each of the identified impact topics, concisely describe the resource and its condition based upon accurate and adequate data for analyzing impacts. Keep in mind that many of these topics interact, and important aspects of natural resources, such as disturbance, succession, rare species, etc. are often overlooked. Some common impact topics for a wilderness stewardship plan are:

- Wilderness character, including each quality of wilderness character
- Vegetation
- Wildlife
- Threatened and endangered species
- Water resources
- Natural soundscapes
- Night skies
- Historic structures
- Ethnographic resources
- Cultural landscapes
- Visitor use and experience

In all cases, wilderness character and its qualities should be analyzed in the impact analysis in a wilderness stewardship plan. However, in cases where certain wilderness qualities are not an issue for a wilderness stewardship plan, they can be considered and dismissed with a justification in the first chapter of the wilderness stewardship plan (e.g., if a plan is not proposing any actions that would affect the undeveloped quality, there would be no need to analyze impacts to this quality).

Wilderness Character Impact Analysis. Management decisions and daily park operations can greatly affect wilderness character. Wilderness character should be the primary impact topic when analyzing impacts on wilderness. Although this section focuses on wilderness character impacts, it is also necessary to analyze non-wilderness character impacts as part of the NEPA document. *Wilderness character qualities must be analyzed in the environmental consequences section.* In addition, the concept of significance is central to NEPA reviews. If an action has the potential to result in significant adverse impacts and applying mitigation measures cannot ensure that significant adverse impacts will be avoided, an environmental impact statement must be prepared. Although evaluation of significance often relies on subjective judgment, the Council on Environmental Quality (CEQ) regulations for implementing NEPA require that evaluations of significance consider both an impact's context and intensity.

Wilderness character impact analysis should consider the following components:

- *Direct versus indirect impacts* – An alternative can directly affect wilderness character (e.g., establishing a backcountry campsite in a wilderness area affects the undeveloped quality), and an alternative can also have an indirect or delayed effect on wilderness character (e.g., developing a campground near a wilderness area, which eventually results in increased use and decreased solitude in the wilderness area).
- *Quality of the impact* – The alternative could have an adverse or beneficial effect on wilderness character.
- *Context of the impact* – Refers to the setting within which an impact may occur, such as a locality or region. In the case of wilderness character, the context is usually either localized or wilderness-wide. In addition to the spatial context, there is a temporal context to wilderness character impacts: is the impact seen immediately during and just after implementation of a management action or will impacts persist long after the action is completed?
- *Intensity of the impact* – Refers to the severity or magnitude of the impact to which wilderness character would be beneficially or adversely affected. This dimension assesses the relative size or amount of the effect, not the geographic extent or duration and frequency. When evaluating intensity, CEQ regulations require the wilderness manager to consider the following (each point is explained in greater detail in the 2015 NPS NEPA Handbook, pp. 20-22):
 - Impacts may be both beneficial and adverse—a significant impact may exist even if the wilderness manager believes the balance of the effect would be beneficial.
 - The degree to which the proposed action affects public health or safety.
 - Unique characteristics of the geographic area, such as proximity to historic or cultural resources, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
 - The degree to which the proposal's effects are likely to be highly controversial.
 - The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.
 - The degree to which the action may establish a precedent for future actions with significant effects.
 - Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
- The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- Whether the action threatens a violation of federal, state, or local law.
- *Cumulative impacts* – Evaluate cumulative impacts across all the qualities of wilderness character and on wilderness character as a whole. The planning team needs to identify past, present, and reasonably foreseeable future actions that have or are likely to impact wilderness character. Past, present, and reasonably foreseeable future actions are not limited to NPS actions, but could be actions taken or proposed by any federal, state, or local government or a private entity, and are actions that are not included in the proposal or alternatives under consideration.

All of the above components should be integrated into a narrative text that fully explains the nature of the impact and its importance (see 2015 NPS NEPA Handbook Supplemental Guidance: Impact Analysis).

For the wilderness character impact topic, all five wilderness character qualities (i.e., untrammeled, natural, undeveloped, solitude or a primitive and unconfined type of recreation, other features of value) may be analyzed separately as subtopics under the wilderness character impact topic. The document should, however, include an overall discussion of the importance of the impacts to wilderness character in total.

An alternative approach to analyzing wilderness character impacts is to analyze a wilderness character quality under another related impact topic and then reference and summarize it under the wilderness character impact topic. For example, the opportunity for solitude or a primitive and unconfined type of recreation quality could be addressed as a subtopic under a broader visitor use and experience impact topic; impacts to the natural quality could be analyzed as a subtopic under vegetation and soils. The wilderness character impact topic would then reference and summarize this analysis.

In both cases, to minimize potential for reader confusion, it is important to use wilderness character terminology and explicitly identify the location of the wilderness character impact analysis in the NEPA document. Also, planning teams should strive to avoid overlap or redundancies among the descriptions of wilderness character qualities and other impact topics.

Best Practices for Analyzing Environmental Impacts

- NEPA reviews must take a “hard look” at impacts that wilderness stewardship plan alternatives would have on wilderness character. The planning team must document it has considered all foreseeable direct, indirect, and cumulative impacts, used sound science and best available information, and made a logical, rational connection between the facts presented and the conclusions drawn in the plan.
- Assess adverse and beneficial impacts to wilderness character separately because an action may result in a localized adverse impact even though there may be an overall beneficial effect.
- Preserving all the qualities of wilderness character is equally important, so managers should carefully weigh impacts and benefits of stewardship activities.
- In analyzing impacts, be sure to consider both context (spatial and duration) and intensity of the impact.
- The document should include an overall discussion of the importance of the impacts to wilderness character in total.

Other Compliance Considerations

Other wilderness stewardship plan compliance may involve section 7 of the Endangered Species Act (ESA), section 106 of the National Historic Preservation Act, tribal consultations, Wild and Scenic Rivers Act, essential fish habitat, coastal zone consistency, and several other policy considerations.

Minimum Requirements Concept in a Wilderness Stewardship Plan

Under NPS *Management Policies 2006* (§6.3.5) “all management decisions affecting wilderness must be consistent with the minimum requirement concept. This concept is a documented process used to determine if administrative actions, projects, or programs undertaken by the National Park Service or its agents and affecting wilderness character, resources, or the visitor experience are necessary, and if so how to minimize impacts.” The minimum requirements concept should be kept in mind in developing a wilderness stewardship plan. As stated in the *Wilderness Stewardship Planning Handbook*:

“The wilderness stewardship plan should include a section that details how the park will apply minimum requirements analysis [MRA] for all potential actions impacting wilderness character. The section should identify the MRA form to be used or guidance to be followed; and describe how the analysis will be initiated and evaluated; the approval process; procedures for ensuring that actions conform to the decision, and for tracking cumulative effects over time. It should also identify possible programmatic minimum requirements analyses.” (p.49)

In addition, if an alternative in a wilderness stewardship plan is proposing actions prohibited under section 4(c) of the Wilderness Act (e.g., allowing motorized equipment), a minimum requirements analysis will need to be prepared as part of the plan/NEPA document.

The NPS Environmental Quality Division and Wilderness Program are currently developing guidance on addressing the minimum requirements analysis and NEPA. When this guidance is issued, this section of the toolkit will be updated. In the interim, planning teams should check with their regional wilderness coordinator and/or the Environmental Quality Division.

Public Involvement in Developing the Plan / NEPA Document

CEQ regulations require that agencies involve the public in decisions that would have environmental impacts to the “fullest extent possible.” One way to meet these requirements is by making environmental assessments and environmental impact statements available for public review and comment.

Gathering Comments. There are a variety of mechanisms for notifying the public of the availability of environmental assessments and environmental impact statements, including the Federal Register, direct or electronic mailings, press releases, website updates, newsletters, and on PEPC. The planning team is encouraged to use electronic communications and digital media whenever possible to facilitate public review and comment. One tool that is particularly useful for disseminating information and facilitating public comments is the PEPC system, which is specifically designed to help with the collection, management, and analysis of public comments. The standard NPS practice is to accept written comments by mail, at public meetings if applicable, at a park unit headquarters, and online through the PEPC system. The preferred method for receiving comments is through the PEPC system; this should be clearly communicated in public outreach materials requesting comments.

Requests for an extension of a comment period should be considered on a case-by-case basis. When considering whether to extend a comment period, the planning team should consider the length of the original comment period, the time frame in which a decision is needed, and any extenuating circumstances that would warrant additional time. For environmental impact statements, in most cases where the comment period is 60 days or more, there should be no need to extend the comment period. If a comment period is extended for an environmental impact statement, it should be done formally through the Environmental Protection Agency (EPA); an NPS Federal Register notice is not required. Extensions of comment periods for an environmental assessment should be accomplished by providing notice to the public in a similar manner that the original comment period was announced.

Circulating an Environmental Assessment or Environmental Impact Statement. Per CEQ regulations, the National Park Service must provide for public involvement in an environmental assessment process to the “extent practicable.” In all cases, the National Park Service is required to notify the public of the availability of an environmental assessment. NPS Director’s Order 75 takes public involvement one step further, however, setting forth the NPS philosophy the agency will “do more than meet the minimum legal requirements for public involvement in our decisions and activities” and seek public input into discretionary decision making. The standard practice for environmental assessments is to allow for a public review period of 30 days that is announced on PEPC and through a press release, direct or electronic mailings, or other effective means of communication. The comment period should commence on the day the planning team announces the availability of the environmental assessment.

In some instances, public meetings to present information on the environmental assessment and solicit comments may be helpful to or appropriate for the planning effort. If there is known public interest in the proposal or if a cooperating agency expresses a desire for a public meeting, the planning team should consider holding one. If the team holds public meetings, notice of those meetings should be included as part of the announcement of the environmental assessment’s availability.

Regarding circulation of an environmental impact statement, CEQ regulations require issuance of both draft and final versions of the document (DEIS and FEIS) for public review and comment. Environmental Impact Statements (both draft and final) must be filed with the Environmental Protection Agency at the time of public release. Upon filing, the Environmental Protection Agency publishes a notice of availability (NOA) of the draft or final environmental impact statement in the Federal Register. CEQ regulations require a DEIS public comment period of at least 45 days after publication of the notice of availability in the Federal Register. The NPS standard practice is to allow a 60-day comment period.

The standard NPS practice is to hold public meetings to present information on the draft environmental impact statement and to solicit comments, although public meetings are not required. When determining whether to hold public meetings or hearings, the CEQ regulations require consideration of factors such as the level of environmental controversy associated with the proposal, the level of public interest, and requests by other agencies for meetings or hearings. It is standard NPS practice to announce meetings or hearings on PEPC and through a press release, direct or electronic mailings, or other effective means of communication.

Responding to Comments. For environmental assessments, the National Park Service must consider all comments that are received in a timely fashion, and the standard NPS practice is to respond to “substantive” comments that are submitted during the public review period. The National Park Service is required to respond to substantive comments submitted during the public review period for draft EIS documents. Substantive comments are those that raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response.

Responding to substantive comments in many cases means more than just providing a written response and can include:

- Making factual corrections in the wilderness stewardship plan environmental assessment or environmental impact statement
- Supplementing, improving, or modifying the analysis
- Modifying alternatives
- Developing and evaluating new alternatives
- Explaining why the comments do not warrant further response by citing sources, authorities, or reasons in support of the NPS position.

Following the close of the comment period, if necessary, the planning team should make changes and respond to substantive comments in errata rather than reissuing the environmental assessment.

The release of a FEIS document and publication of the EPA notice of availability for the FEIS document is followed by a 30-day period during which the National Park Service cannot make a final decision; i.e., a Record of Decision cannot be signed until at least 30 days after publication of the EPA notice of availability. This is commonly called the “30-day no action period.” It is not a formal comment period; however, agencies or members of the public may make comments before a final decision is made. If the planning team receives comments on a FEIS document, it should consider them to the extent practicable, but the team is not required to formally address the comments.

Best Practices for Public Involvement in the Development of the Plan/ NEPA Document

- The planning team must notify the public of the availability of an environmental assessment.
- Public meetings to present information on the wilderness stewardship plan and solicit comments may be helpful or appropriate for the planning effort.
- Public comment periods of 30 days for an environmental assessment and 60 days for draft and final environmental impact statement documents are standard NPS time frames.
- When preparing written responses, the planning team does not need to respond to every individual substantive comment received—it is acceptable to summarize similar comments and create a single response.
- The planning team should use the PEPC system to help with organizing and responding to comments. PEPC can be particularly helpful when there are a large number of comments.



Development of the Decision Document

For the National Park Service, the Finding of No Significant Impact and the Record of Decision are formal decision documents resulting from NEPA reviews. Once a Finding of No Significant Impact or a Record of Decision is signed by the regional director, the NEPA process formally ends.

For environmental assessments, the Finding of No Significant Impact serves two functions in the National Park Service. First, it documents the NPS decision on a proposal evaluated in an environmental assessment. Second, it documents the conclusion that implementation of the selected action would not result in significant adverse impacts. Neither the CEQ nor DOI NEPA regulations provide detailed requirements for the content of Finding of No Significant Impact. The standard content of an NPS Finding of No Significant Impact is reflective of the dual purposes described above. The project team must notify the public of the availability of a Finding of No Significant Impact once it is signed. The standard NPS practice to meet this requirement is to announce its availability on PEPC and through a press release, direct or electronic mailings, or other effective means of communication.

For environmental impact statements, the Record of Decision documents the NPS decision on a proposal evaluated in an environmental impact statement. A Record of Decision is typically signed by the regional director and should be signed only after all EIS process requirements and other consultation requirements (such as ESA Section 7 and NHPA Section 106) have been met. Similar to a Finding of No Significant Impact, the content of the Record of Decision typically begins with a brief summary or background of the proposal and includes the following:

- Clearly identify and describe the selected action/alternative; if the selected alternative has been changed since release of the FEIS document as a result of public or agency comments, briefly describe the changes, the reasons for the changes, and whether and how the changes alter the impact analysis that was included in the FEIS document.
- Briefly describe other alternatives considered and analyzed in detail.
- Discuss the rationale for the decision reached (i.e., why the alternative was chosen as the selected action).
- Identify the environmentally preferable alternative. A brief discussion of the rationale for the identification should be provided.
- State any mitigation measures that are not inherently integral to the selected action's implementation and a summary of any monitoring or enforcement programs associated with the mitigation.
- Include a statement of whether all practical means to avoid or minimize environmental harm from the selected action have been adopted, and if not, why.

Regarding public notification of a Record of Decision (and similar to public notification of a Finding of No Significant Impact), it is standard NPS practice to announce the availability of a Record of Decision on PEPC and through a press release, direct or electronic mailings, or other effective means of communication. The project team may wish to post the Record of Decision on PEPC as well. For most actions, implementation of the selected action may commence once the Record of Decision is signed and proper notice of its availability is announced to the public. If changes to the selected action occur after the Record of Decision is signed but before the action is implemented, additional NEPA review may be required.

Best Practices for Developing the Decision Document

- A Finding of No Significant Impact or Record of Decision should be signed only after all EA process requirements and other consultation requirements (such as ESA Section 7 and NHPA Section 106) have been met.
- Standard NPS practice involves announcing the availability of a Finding of No Significant Impact or Record of Decision on PEPC and through a press release, direct or electronic mailings.

Sources of Additional Information

National Park Service

- 2015 *NPS NEPA Handbook*.
https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf
Selecting the NEPA Pathway: pp. 16-22
- Identifying environmental issues and impact topics: pp. 50-52
 - Impact analysis: pp. 19-22, 61-64
 - Public involvement: pp. 12-13, 45-47, 64-67, 69, 70-71
 - Decision documents: pp. 67-72
- 2015 “Writing Impact Analysis Sections for EAs and EISs.” https://www.nps.gov/orgs/1812/upload/SupplementalGuidance_Impact-Analysis_Final_9-2015.pdf
- 2014 *NPS Wilderness Stewardship Plan Handbook* https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm
- Selecting impact topics: p.66
 - Environmental consequences: pp. 67-68
 - Minimum requirements concept: pp. 48-49
 - Public involvement: pp. 26-27, 69
- 2014 *Keeping it Wild in the National Park Service. A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring*. http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf
- Selecting impact topics: p.76
 - Environmental consequences: p.78
 - Minimum requirements analysis: pp. 66-71
 - Decision documents: p.79
- 2008 *General Management Planning Dynamic Sourcebook* <http://share.inside.nps.gov/sites/WASO/PPFL/PSS/GMP/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2F-WASO%2FPFL%2FPSS%2FGMP%2FShared%20Documents%2FWASO&FolderC-TID=0x01200033265CA3871B064299A2CAAE3F47AC9C&View=%7B13F1F347-4D33-408E-8FCD-B2844DA46B8E%7D>
- Impact topics: pp. 10-1 to 10-4
 - Environmental consequences: pp. 10-5 to 10-6, 10-8 to 10-10 {Note that the discussion of impact thresholds on pp. 10-6 to 10-8 is outdated and no longer being followed.}

Component 7. Programmatic Minimum Requirements

“When you try to change any single thing, you find it hitched to everything else in the universe.” John Muir

NPS *Management Policies 2006* states “All management decisions affecting wilderness must be consistent with the minimum requirement concept. This concept is a documented process used to determine if administrative actions, projects, or programs undertaken by the Service or its agents and affecting wilderness character, resources, or the visitor experience are necessary, and if so how to minimize impacts. . . . In accordance with this policy, superintendents will apply the minimum requirement concept in the context of wilderness stewardship planning, as well as to all other administrative practices, proposed special uses, scientific activities, and equipment use in wilderness. . . . Parks will complete a minimum requirement analysis on those administrative practices and equipment uses that have the potential to impact wilderness resources or values.”

The NPS *Wilderness Stewardship Planning Handbook* identifies several guidelines on minimum requirements analysis, which wilderness stewardship plans should address:

- the MRA form to be used or guidance to be followed in applying the minimum requirements analysis,
- how the analysis will be initiated and evaluated,
- the approval process,
- procedures for ensuring that actions conform to the decision, and for tracking cumulative effects over time, and
- possible programmatic minimum requirements analyses.

Ordinarily each proposed park management action is evaluated separately through its own minimum requirements analysis. However, in cases when a certain administrative action occurs routinely and/or frequently (e.g., wilderness boundary fence maintenance) wilderness stewardship plans may include programmatic minimum requirement decision guides (MRDGs). (See the *Petrified Forest National Park Wilderness Stewardship Plan* as an example.) These analyses allow managers to eliminate repetitive analysis and better consider cumulative impacts.



Best Practices for Developing a Programmatic Minimum Requirements Decision Guide

- Programmatic minimum requirement analyses and decision guides should rarely be prepared, and only in instances when the social and biophysical values and potential effects of a repetitive or routine action will be nearly identical. Always keep in mind that a programmatic MRA should not be done as a substitute for a project-specific MRA.
- The analysis must be thorough and well-documented, with well-defined sideboards, mitigations, thresholds and ending dates.
- A range of management options should be identified and analyzed for the preferred alternative, covering all likely possible actions as well as a “no action” alternative.
- The programmatic minimum requirement decision guide should follow the same format used in the parks’ MRAs, with all the questions answered. The first step is to determine if any administrative action in wilderness is necessary. If an action is determined necessary, then the guide determines the minimum activity, describing the alternatives and analyzing their effects on the wilderness character qualities and other criteria as appropriate. This will ensure impacts on wilderness resources and character are minimized. A rationale should also be provided for why an alternative meets the MRA concept⁷.
- Be sure to include a sunset date in a programmatic MRA to indicate this is not indefinitely in place. Additional review should take place to determine if the programmatic MRA needs to be revised or dropped due to changing conditions.

Sources of Additional Information

National Park Service

- 2014 *Wilderness Stewardship Planning Handbook* (pp. 48 – 50) https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm
- 2014 *Keeping it Wild in the National Park Service. A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring.* (pp. 66 – 74) http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf
- 2013 *Petrified Forest National Park Wilderness Stewardship Plan / EA:* pp. 46 - 48, 191 - 228. <https://home.nps.gov/pefo/learn/management/upload/PEFO-Wilderness-Stewardship-Plan-Environmental-Assessment.pdf>
- 2006 *NPS Management Polices 2006*, Section 6.3.5. <http://www.nps.gov/policy/MP2006.pdf>.

National Wilderness Steering Committee. Guidance White Paper Number 3. “Minimum Requirements Decision Process.” https://www.nps.gov/policy/Reference%20Manual%2041_rev.htm

Wilderness.net “Minimum Requirements Analysis” <http://www.wilderness.net/index.cfm?fuse=MRDG>

⁷ For prohibited uses “necessary” is the correct standard. However, NPS Management policies 2006 indicates “appropriate” is the correct standard for non-prohibited uses. For example, it is hard to argue scientific research is necessary to administer an area as wilderness, but it is an appropriate activity.

Component 8. Amendments and Revisions to a Wilderness Stewardship Plan

“There is nothing permanent except change.” Heraclitus

“The wilderness that has come to us from the eternity of the past we have the boldness to project into the eternity of the future.” – Howard Zahniser, author of the Wilderness Act, from “The Need for Wilderness Areas.”

There are no requirements for a wilderness stewardship plan to consider when it needs to be amended or replaced, and planning teams may or may not decide to include a section on evaluating when a plan needs to be updated. If a planning team decides to cover this topic, the following information is useful to consider.

Wilderness stewardship plans are long-term implementation plans. However, wilderness management is an iterative process, with ongoing monitoring informing managers of the effectiveness of their actions and identifying when changes are needed to meet management goals and objectives. This calls for some flexibility in implementing a wilderness stewardship plan. Environmental, social, and political conditions change, as does the information available to most effectively manage the wilderness area, and it is not the intent of a wilderness stewardship plan to freeze conditions. Over time, changing conditions may call for changes in the management approach to protecting wilderness resources and character. On the other hand, the specific directions and desired future conditions in a wilderness stewardship plan should not be changed without a lot of thought and good justification and documentation.

Existing wilderness stewardship plans fall into one of three categories with regard to determining the need for an amendment or replacement:

- The current plan remains relevant for a park (e.g., desired conditions and management actions are still relevant). In this case a wilderness stewardship plan should be reviewed approximately every 5 years to ensure it remains valid.
- Existing or anticipated issues facing a wilderness area require the preparation of a new wilderness stewardship plan.
- One or more elements of a wilderness stewardship plan need to be added or changed, but all other aspects of the approved plan remain valid. In this case a plan amendment is warranted.

In evaluating whether or not a wilderness stewardship plan needs to be updated or replaced, two primary questions need to be answered:

- Based on current evidence, where are we now as far as protection of the area’s wilderness resources and character—how are we doing?
- Are we getting where we want to go regarding protection and maintenance of the area’s wilderness resources and character, and how will we get there?

Other questions that may want to be considered as evaluation criteria include:

- Are the plan’s goals and desired conditions up-to-date, and still relevant to management of the wilderness area?
- Is the plan actually being used, or is it just sitting on the shelf?

If a major change is needed that would have the potential to result in new or controversial actions or impacts that have not been analyzed, then a formal amendment or a replacement plan should be prepared. Examples of circumstances that might trigger a major change in a wilderness stewardship plan include:

- new legislation that affects management of the wilderness area
- a change in adjacent land use that requires a major change in the management of the wilderness area
- a major change in the type of use, the level of use, or access of the area that affects management of the wilderness area
- new conflicts between different types of visitor uses
- new discoveries or scientific findings not considered in the original plan
- additional lands are added to the park and identified in one of the wilderness categories (eligible, proposed, recommended, or designated)

Best Practices for Amending/Revising a Wilderness Stewardship Plan

- Evaluation criteria should be specific, easy to determine if they are being met or not, and cover all of the wilderness character qualities.
- The criteria should be as clear as possible, avoiding ambiguity and vague terms (e.g., “generally,” “usually”).
- Criteria that contain conjunctions (and, or, with, also) can often be split into independent criteria.
- The criteria should be practical and not take a lot of staff time or funds to answer.

Sources of Additional Information

IUCN Protected Area Governance and Management. Chapter 28: “Protected Area Management Effectiveness” <https://press.anu.edu.au/publications/protected-area-governance-and-management/download>

National Park Service

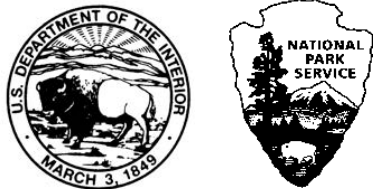
2008 *General Management Planning Dynamic Sourcebook*: pp. 3-2 to 3-5). <http://share.inside.nps.gov/sites/WASO/PPFL/PSS/GMP/Shared%20Documents/Forms/AllItems.aspx?-RootFolder=%2Fsites%2FWASO%2FPPFL%2FPSS%2FGMP%2FShared%20Documents%2FWASO&FolderCTID=0x01200033265CA3871B064299A2CAAE3F47AC-9C&View=%7B13F1F347-4D33-408E-8FCD-B2844DA46B8E%7D>

Wilderness Management. Stewardship and Protection of Resources and Values. 4th edition. pp. 212-214.

World Commission on Protected Areas. “Evaluating Effectiveness. A Framework for Assessing Management Effectiveness of Protected Areas.” Best Practice Protected Area Guidelines Series No. 14. <https://portals.iucn.org/library/efiles/edocs/PAG-014.pdf>







As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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