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October 26, 2010

Lauren Stull
Deputy District Ranger
Cheoah Ranger District
National Forests in North Carolina
RE: removing "hazard" trees in the Joyce Kilmer-Slickrock Wilderness

Dear Ranger Stull:

Wilderness Watch recently learned that the Forest Service is proposing to remove numerous dead and dying trees from the Joyce Kilmer-Slickrock Wilderness. According to the agency's October 22, 2010 news release, approximately 150 large hemlock trees along the Joyce Kilmer Trail will be removed to make the Wilderness safe for hikers in the area. The news release also states that the Forest Service considered closing the trail until the trees naturally fall, but chose instead to remove the trees so as to keep the area open to the public.

Has the Forest Service engaged the NEPA process for this action? If so, please provide me with the appropriate documents, including a minimum requirements decision guide if one was prepared.

Wilderness Watch urges the Forest Service to reconsider its decision to remove the trees from Wilderness. The decision violates both the spirit and the letter of the Wilderness Act and is a sharp departure from Forest Service wilderness policy. We also urge you to keep the trails open to visitors so that those who chose to visit the area can experience Wilderness complete with all its risks and uncertainties. Visitors should be allowed to experience nature on its own terms. Falling trees are a natural hazard that anyone who enters a Wilderness must be willing to accept. These are not managed forests, gardens, or city parks. If visitors expect a manicured forest or a park-like experience in the Joyce Kilmer-Slickrock Wilderness, then the Forest Service has failed in its educational mission to inform visitors of what Wilderness is all about. In a wilderness stewardship context, the current situation isn't a problem to be solved, but rather an opportunity to inform and educate visitors about Wilderness and the values the Wilderness Act seeks to preserve.

Underlying the proposal is the premise that wilderness stewards should make visitors safe from natural hazards and conditions. This approach is the antithesis of Wilderness. Hazard trees are a natural part of a wilderness experience much like avalanches, flash floods, dangerous rapids, grizzly bears, and other natural elements are potential dangers to visitors. The role of wilderness stewards is to ensure that wild, untrammelled conditions are preserved for visitors seeking a wilderness experience, not to interfere in those processes so that visitors are assured of a safe and sterilized recreational outing.

Forest Service regulations are clear on this point. "In resolving conflicts in resource use, wilderness values will be dominate to the extent not limited by the Wilderness Act." (36 C.F.R. 293.2(c)). Forest Service policy also points to the need to leave the trees alone: "Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation, or regulations." (FSM 2320.3). This policy is reiterated in the agency's Wilderness Management

Model: "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. (FSM 2320.6).

Moreover, the Wilderness Act requires managers to preserve the area's wilderness character. In this case the Forest Service has mistakenly placed recreation use above its responsibility to protect the area's wilderness character. The agency has placed non-wilderness-dependent recreation, where safety is assured, above its responsibility to provide for wilderness-dependent recreational opportunities, where risk, adventure, and self-reliance are the norm. Not only is the agency's proposal inconsistent with the Act's goal of preserving untrammelled wilderness, it also diminishes the very recreational opportunities the Wilderness Act sought to preserve.

Wilderness Watch recommends the following course of action.

1. Rather than cut down or blow up the trees, or close the trails because of potential hazards, the dead and dying trees be left alone to fall as dead trees naturally do. In their own time. The trails should not be closed because of such hazards any more than Wilderness should be closed in winter because of potential avalanches or severe storms. Warning signs could be posted at the trailhead(s) informing visitors of the potential risk, and also explaining how the risks are part of the wilderness environment and experience that wilderness stewardship seeks to preserve.
2. The Forest Service should use this as a "teachable moment," an excellent opportunity to inform visitors and local communities about Wilderness and wilderness stewardship. Included in that message should be something about the risks posed by the introduction of non-native organisms into Wilderness ecosystems.
3. Most importantly, the challenges posed to visitors by the dying and falling trees presents an excellent opportunity to talk about the need for restraint. Visitors to Wilderness must be willing to modify their demands, expectations, and behavior out of respect for wildness, rather than insist that the Wilderness be modified to accommodate their demands.

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

Sincerely,

George Nickas
Executive Director