



Minimum Requirements Analysis

FAQs and Common Errors



Preface

The intent of this document is to clarify and address questions often submitted by Forest Service personnel and common errors associated with completing a Minimum Requirements Analysis (MRA) for wilderness projects. Employees of other agencies may find it useful as well, but agency policies may differ and additional research may be required. The following online trainings are considered prerequisites to completing an MRA and should be completed before referencing this document:

- *The Wilderness Act*
- *Writing a Minimum Requirements Analysis*

These are found here: <http://www.wilderness.net/NWPS/elearning>.

This document is designed to supplement the instructions for the Minimum Requirements Decision Guide (MRDG). You are advised to review the instructions prior to searching this document for answers to your questions.

The MRDG Instructions are found here:

http://www.wilderness.net/MRDG/documents/MRDG_instructions.pdf.

More MRA resources can be found here: <http://www.wilderness.net/MRA>, including recorded webinars, case study examples, an evaluation guide, and agency guidelines. Current training opportunities provided by the Arthur Carhart National Wilderness Training Center can be found here: <http://www.wilderness.net/NWPS/training>.



Acronyms:

MRA = Minimum Requirements Analysis

An MRA is a statutory obligation derived from Section 4(c) of the Wilderness Act of 1964. This section of the Act specifically prohibits several uses, except “*as necessary to meet minimum requirements for the administration of the area for the purpose of this Act.*” An MRA applies this language to a situation and results in a determination of the “minimum necessary,” which may or may not justify prohibited uses. The Act does not prescribe a means of completing an MRA.

MRDG = Minimum Requirements Decision Guide

The MRDG was developed by the Arthur Carhart National Wilderness Training Center as a tool for completing an MRA. It provides a structured, rigorous process for arriving at defensible determinations of the minimum necessary. The MRDG is the primary means of completing an MRA approved for use by the Forest Service, Fish and Wildlife Service, and Bureau of Land Management.

Disclaimer: MRA and MRDG are referenced throughout this document. MRA is used when referring to the bigger picture analysis process, whereas MRDG is used when referring to writing the document and the specific components of the MRDG tool.



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The Basics

When do I have to complete an MRA?

An MRA is required by law when uses prohibited under Section 4(c) of the Wilderness Act are being considered for a project in wilderness:

“Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet **minimum requirements** for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be:

- **no temporary road,**
- **no use of motor vehicles, motorized equipment or motorboats,**
- **no landing of aircraft,**
- **no other form of mechanical transport, and**
- **no structure or installation**

within any such area.”

Though not required by law, it is also recommended that an MRA be conducted whenever an administrative action may adversely affect wilderness character whether a prohibited use is considered or not. In addition, the use of chemicals requires Regional Forester approval (FSM 2323.34f), and is facilitated using an MRA.

The MRDG provides a thorough and methodical process to assist managers/decision makers in conducting an MRA and is the preferred tool for analysis documentation in the Forest Service.

Do I have to conduct MRAs for emergencies?

First, what is an emergency? According to a court decision ([Olympic Park Assoc. v. Mainella, 2005](#)), emergencies are:

“...matters of urgent necessity rather than... conveniences for future use ...”

FSM 2326.1(1) specifies an emergency as “inescapable urgency and temporary need for speed beyond that available by primitive means.” This basically permits an appropriate response to an emergency. For example, it allows a helicopter evacuation of a critically



injured person, but it does not allow you to establish helipads where you think you might need them in the future.

Section 4(c) of the Wilderness Act specifically states that emergencies are not exempt from an MRA where prohibited uses are involved. An MRA must be conducted when prohibited uses are proposed – such as emergency activities utilizing motorized equipment and mechanical transport. Address this programmatically and proactively in internal emergency response plans or other planning documents, and via MOUs or other instruments with cooperators. Do not wait for an emergency to complete an MRA.

Typically, programmatic MRAs for emergencies are addressed through an agreement or planning document, not an MRDG. For example, you may have an MOU with your local search and rescue organization that specifies when and how to deploy a helicopter evacuation. It can be helpful to use the MRDG structure to discuss options and responses to potential scenarios so that FS units and partners understand their responsibilities in wilderness

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Section 4\(c\)](#)

FSM 2326.1(1)

Wilderness.net → *Management Tools* → *Toolboxes* → [Search and Rescue Toolbox](#)

Do I have to do an MRA if the result of the proposed action is going to have a positive effect on wilderness character?

Yes. You need to do an MRA if a prohibited use under Section 4(c) of the Wilderness Act is being considered, no matter the effects to wilderness character. All effects (positive and negative) to wilderness character are identified and documented in the process of conducting the MRA. Having a positive effect on wilderness character doesn't negate the fact that the positive effect was derived via a prohibited use under law. The ideal situation would be to have a positive effect on wilderness character without requiring a prohibited use.

Where do I find the MRDG workbook, instructions, and other resources for conducting an MRA?

The MRDG workbook and instructions can be downloaded from wilderness.net. This site also contains training resources, recordings of a webinar series, case studies, agency guidelines, and other helpful information.



Additional Information:

Wilderness.net → *Management Tools* → [Minimum Requirements Analysis](#)

Who should complete the MRA?

The local Wilderness Manager(s) should always have a role in the development of an MRA, and is generally the writer/coordinator for the analysis. If the wilderness program is the proponent of the project, then the Wilderness Manager would be the primary specialist that works on the MRA with input from other affected resources. If another resource area is proposing a project, then they too will assist in completing the MRA. For example, if engineering is proposing construction of a bridge in wilderness, then engineering staff should develop the project proposal, including development of the different project components and possible alternatives. If this is the case, the Wilderness Manager would then ideally conduct the actual analysis of the effects to wilderness character since they are the resource specialist for wilderness and in most cases have the deepest understanding of wilderness character. The engineering staff would then review the results of the MRA. Any resource that is represented in the project proposal should play a part in the MRA. Wilderness is an interdisciplinary resource, and the Wilderness Manager likely does not have the expertise to represent the interests of other resource programs.

Whoever works on a MRA will need some training on the MRA process and MRDG tool. The Arthur Carhart National Wilderness Training Center offers both classroom and online training courses related to the MRA process. See the Minimum Requirements Analysis section of *wilderness.net* for a listing of the most current training opportunities.

How much time does an MRDG take to complete?

The length and complexity of an MRDG varies according to the complexity of the situation, number of feasible alternatives, and the magnitude of the effects to wilderness character and other criteria. No two are alike and some may, in fact, be complicated. But, these are critical documents and must be given the attention they require for a proper analysis.

The Carhart Center offers courses in writing and evaluating MRDGs and also offers numerous examples of actual MRDGs online. Combining these resources with practice and mentors should afford authors expertise and efficiency in completing MRDGs. A well-written MRDG will be straightforward regarding the issues, the alternatives, the impacts/benefits and the rationale for the final determination. The scope of analysis should be consistent throughout and the alternatives should represent the best feasible options, including maintaining the status quo and/or taking no action. If an MRDG



becomes complicated or protracted, it is worth stepping back and reassessing. Consult wilderness colleagues and veteran MRDG authors to see how they would proceed.

Additional Information:

Wilderness.net → *Management Tools* → [Minimum Requirements Analysis](#)

NEPA

What is the relationship between MRDGs and NEPA?

The MRDG is designed to assist with preparation of a NEPA analysis, but is not a substitute for a NEPA analysis. The MRDG provides a method to determine the necessity of an action, the effects of alternatives on wilderness character, and how to minimize impacts to wilderness character; NEPA analysis compares and discloses the environmental effects of alternatives on all resources, documents a decision, and requires public involvement.

The MRDG should be completed before other NEPA documents because it results in a recommendation for decision makers. Completing a NEPA analysis without it being informed by the MRDG might suggest the MRDG was completed for the purpose of supporting a predetermined decision. This is highly unethical. The only way a planning document could take the place of an MRDG is if the planning document contains an adequate MRA within it.

Additional Information:

[MRDG Forest Service Guidelines](#) → *Forest Service Guidelines for Use of the MRDG*

[MRDG Forest Service Guidelines](#) → *NEPA Analysis – Decision Process*

[MRDG Overview](#) → *The MRDG and NEPA*

[MRDG Overview](#) → *The MRDG and the Planning Process*

Alternatives

What does No Action alternative mean?

The “No Action” alternative often means a continuation of the current management situation, without taking any additional action. It does not mean ceasing an ongoing action. The “No Action” alternative may also refer to not pursuing or not allowing a new activity that is proposed where it hasn’t previously occurred. The “No Action” alternative



displays the effects (positive or negative) of not taking action and is used as a baseline for comparing effects of the action alternatives in Step 2 of the MRDG.

Making the Decision

Who has the delegated authority to authorize an exemption to prohibited uses?

The authority to authorize an exemption to a prohibited use is directly determined by who has the authority for approving administrative actions in wilderness. FSM 2320 and regional supplements identify the authorized officer that has responsibility to approve administrative actions in wilderness, which depends on the type of action being addressed. Regional Foresters have the most decision authority for MRDGs. Forest Supervisors and District Rangers are assigned relatively little decision authority, unless this authority is delegated by the Regional Forester per regional delegation policies. If you are in doubt about the decision authority for a given action, it is recommended that you check with your Regional Wilderness Program Manager.

Additional Information:

[MRDG Forest Service Guidelines](#) → *Authority for Approval
FSM 2320 and regional supplements
Consult with your Regional Wilderness Program Manager*

Can economics and/or time constraints serve as the primary basis for selecting an alternative in an MRDG?

Generally, no, but both economics and time constraints can influence the outcome of the MRDG in different ways. These two criteria are often misunderstood, easily abused, and sometimes confused.

Time Constraints. This is meant to refer to material time constraints that physically limit the range of alternatives in an MRDG. It should not be confused with efficiency or expediency. Breeding or nesting seasons for certain species, the number of snow-free weeks in the field season, or conditions that are degrading rapidly over time are examples of legitimate time constraints that may affect the range of alternatives and, therefore, the MRDG determination.

Economics. This is meant to refer to the total estimated cost of the alternative, including the direct and indirect costs of labor, supplies, and equipment. It should not be confused with effects on businesses, users, or local or regional economies. Generally, cost alone cannot be used to justify a selection, but all alternatives must be financially feasible.



And, if two or more alternatives have similar effects to wilderness character, this criterion can be legitimately applied to the selection.

The Wilderness Act of 1964 contains no provisions for making decisions based upon time constraints or economics, and preservation of wilderness character is placed first and foremost above all other considerations. Forest Service policy (FSM 2320.6) further states: “*Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.*”

Additional Information:

[MRDG Instructions](#) → Step 2 → Time Constraints

[MRDG Instructions](#) → Step 2 → Alternative Comparison Criteria, Economics

[MRDG Forest Service Guidelines](#) → Applying the Minimum Requirements Process

Can a decision to allow a prohibited use be justified on the basis of safety?

The safety of wilderness visitors and/or workers (agency personnel, partners, volunteers, and/or contractors) is of utmost importance and must be a priority in every action taken. However, most actions involve some measure of risk and should be evaluated in the context of preserving wilderness character. This is why safety is included in the analysis process in Step 2 of the MRDG. Risk associated with each alternative is documented in Step 2, as well as possible mitigations. Hazards presented by most activities can be fully and reasonably mitigated through proper training, personal protective equipment (PPE), and safe practices. Only a hazard that can't be fully or reasonably mitigated should be considered a possible decision driver. The MRDG is intended to help identify, analyze, and select appropriate management actions in wilderness without compromising safety. If a safety concern can't be adequately mitigated and a decision to take action is made, then the decision might be justified on the basis of safety.

Additional Information:

[MRDG Instructions](#) → Step 2 → Safety of Visitors and Workers

[MRDG Instructions](#) → Step 2 → Comparison of Alternatives

What weight do maintaining traditional skills have on the MRDG decision?

Maintenance of traditional skills is a positive benefit to a wilderness program, but it is not a key factor in the minimum requirements decision. The decision should ultimately be based on the effects to wilderness character. However, if two alternatives have equal effects to wilderness character but one will allow workers to maintain traditional skills, then your decision may be influenced because traditional skills are something you want



to maintain in your workforce. In addition, making the decision to use traditional skills may help you comply with law and avoid a prohibited use.

Additional Information:

[MRDG Instructions](#) → Step 2 → Comparison of Alternatives → Traditional Skills

Can the public purposes of wilderness “trump” the mandate to preserve wilderness character?

No. The public purposes cited in Section 4(b) of the Wilderness Act are deemed the appropriate uses of wilderness if they are consistent with the preservation of wilderness character; they do not supersede our primary mandate to preserve wilderness character. All uses of wilderness must be consistent with both the public purposes and the preservation of wilderness character. Actions that are consistent with the public purposes but unnecessary to the preservation of wilderness character cannot be justified in a MRA. In fact, actions that are necessary to preserve wilderness character are inherently consistent with the public purposes. Since the inverse may not be true, the public purposes alone cannot be used to justify an action in a MRA.

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Section 4\(b\)](#)

[MRDG Instructions](#) → Step 1 → Wilderness Character

Other Laws/Guidance – Other Direction

Where do I find other laws/guidance that applies to my project and/or wilderness area?

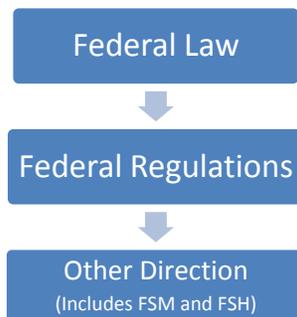
Federal laws other than the Wilderness Act of 1964 may influence the need for action in wilderness. Common examples include the Endangered Species Act (ESA), the National Historic Preservation Act (NHPA), the enabling legislation for a particular wilderness, and subsequent wilderness legislation specific to the wilderness area you are managing. An “[Overview of Key Laws](#)” is provided on www.wilderness.net under the link, “Law and Policy.” This is a good place to start in determining other laws/guidance that may apply to your project proposal. In addition, the other resource specialists involved in developing the MRA should also key you into the potential link to other federal laws. For example, if your project includes an archaeological site, then the archaeologist who is participating in the analysis should be able to assist you with applying the NHPA as necessary.



Your unit should have documentation of the enabling legislation for the wilderness area you manage. You may also find this on www.wilderness.net; click on “Find a Wilderness” in the menu, then search for your wilderness, and click “Wilderness Laws” to view a listing of applicable laws for your wilderness.

How does “other direction” affect the determination of the minimum necessary in an MRDG?

Plans, agreements, policies, and even State laws might serve as “other direction” in an MRDG, and they can be useful in the development of alternatives in Step 2 of the MRDG. But, they cannot alone compel us to take action in Step 1 nor justify prohibited uses in Step 2. Only federal law (e.g., the Wilderness Act) or a private right can compel action. No other form of guidance can supersede federal law; where conflicts occur, we must defer to federal law.



Additional Information:

[MRDG Instructions](#) → Step 2 → Other Direction

Prohibited Uses

How do I know if something is a prohibited use?

Prohibited uses are listed in Section 4(c) of the Wilderness Act:

“...there shall be:

- **no temporary road,**
- **no use of motor vehicles, motorized equipment or motorboats,**
- **no landing of aircraft,**
- **no other form of mechanical transport, and**
- **no structure or installation**

within any such area.”



FSM 2320.5 only explicitly defines half of the prohibited uses: *structures, installations, mechanical transport, and motorized equipment*. Most of the remaining Section 4(c) prohibited uses (i.e., aircraft, motorboats, and motor vehicles) are lumped into these definitions.

Structures are defined in FSM 2320.5 under *permanent improvement*, which are typically in place for more than one field season. The *temporary structure* definition (FSM 2320.5) is a little vague about what it might really include and whether or not it might be considered a prohibited use. In any case, to be considered temporary, the structure must be easily removed and must be removed between periods of actual use. It typically is in place for less than one field season. **Since the Wilderness Act doesn't differentiate between temporary and permanent structures and installations, we should regard both as prohibited and subject to an MRA.**

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Section 4\(c\)](#)

[MRDG Forest Service Guidelines](#) → *Definitions*

FSM 2320.5 (definitions), 2323, 2324, 2326 and Regional Supplements

Wilderness.net → *Management Tools* → [Minimum Requirements Analysis](#) →

Minimum Requirements Analysis Webinars → *Webinar #4C FS Policy*

By law, under what circumstances might we authorize a prohibited use?

According to the Section 4(c) of the Wilderness Act, there are three circumstances under which prohibited uses might be authorized:

- 1) *"Except as specifically provided for in this Act..."* (See the special provisions of the Act in Section 4(d).)
- 2) *"...subject to existing private rights..."*
- 3) *"...except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act..."*

AND, Congress can supersede itself, so there is a fourth circumstance:

- 4) by provision of another federal law, especially by subsequent wilderness legislation.

Prohibited uses may be authorized when prescribed or allowed by provision of law or an existing private right. However, unless a provision of law specifies a prohibited use or such a use is inherent to an existing private right, an MRA is still required to ensure that only the minimum means are authorized.



Prohibited uses may be authorized for other *administrative* purposes when deemed the minimum necessary for the purpose of the Act. Generally, this includes only actions that are essential to the preservation of wilderness character. But, according to the Act, “administration” also includes “*measures required in emergencies involving the health and safety of persons within the area.*”

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Sections 4\(c\) and 4\(d\)](#)

[MRDG Forest Service Guidelines](#) → *The Wilderness Act and Minimum Requirements*

By FS policy, under what circumstances might we authorize a prohibited use?

By policy, consistent with law and subject to an MRA, motorized equipment or mechanical transport prohibited uses may be authorized under the following circumstances:

1) Emergencies involving inescapable urgency and temporary need for speed beyond that available by primitive means, including:

- Fire Suppression
- Health & Safety (Search & Rescue)
- Serious Crime or Fugitive Pursuit (LE&I)
- Removal of Deceased Persons
- Aircraft Accident Investigations

NOTE: The law requires an MRA for emergencies. This does not require the use of an MRDG. It is typically done programmatically in advance of an emergency through the development of an MOU or other type of Search & Rescue agreement. The agreement is structured in a way that provides a legally defensible determination of the minimum necessary in given situations and provides an MRA-appropriate decision framework. See “The Basics” above for more information.

2) Aircraft or motor boat use established before the area was designated as wilderness.

3) Exploration and development of valid existing mineral rights.

4) Access to surrounded State and private lands and valid occupancies.

5) To meet minimum needs for the protection and administration of the area as wilderness, only as follows:

- A delivery or application problem necessary to meet wilderness objectives cannot be resolved within reason by non-motorized means.
- An essential activity is impossible to accomplish by non-motorized means because of such factors as time or season limitations, safety, or other material restrictions.



- A necessary and continuing program was established around the use of motorized equipment before the unit was designated wilderness, and its continued use is essential to the continuation of the program.
- Removal of aircraft wreckage when non-motorized means are unsuitable.

Remember, FS policy does not supersede law, so any authorization of prohibited uses must be consistent with the law as well.

Additional Information:

FSM 2326.1 – Conditions Under Which Use May Be Approved

Can exemptions be made for prohibited uses for non-administrative purposes?

Yes, but very rarely and under different circumstances than administrative exemptions. According to the Section 4(c) of the Wilderness Act, there are three circumstances under which prohibited uses might be authorized:

- 1) *“Except as specifically provided for in this Act...”* (See the special provisions of the Act in Section 4(d).)
- 2) *“...subject to existing private rights...”*
- 3) *“...except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act...”*

AND, Congress can supersede itself, so there is a fourth circumstance:

- 4) by provision of another federal law, especially by subsequent wilderness legislation.

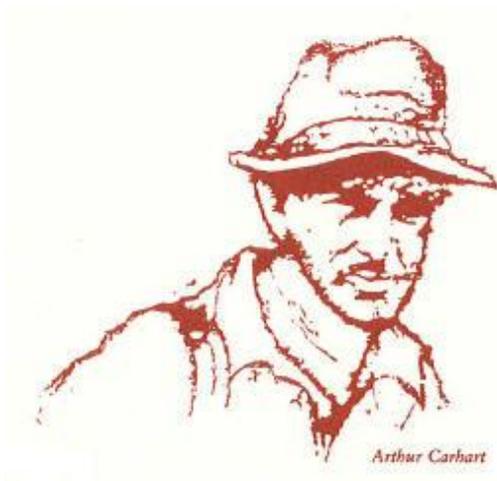
Exemptions are seldom made for *non-administrative* purposes, and only when prescribed or allowed by provision of law or an existing private right. For example, an exemption for motorized equipment may be authorized to maintain a private water right. When considering provisions of law, do not confuse the words “may” and “shall.” And, unless a provision of law specifies a prohibited use, an MRA is still required to ensure that only the minimum means of realizing the provision are authorized. The same is true of existing private rights. When such rights do not inherently prescribe a prohibited use, they may only be exercised by the minimum means.

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Sections 4\(c\) and 4\(d\)](#)

[MRDG Forest Service Guidelines](#) → *The Wilderness Act and Minimum Requirements*





Arthur Carhart's
Top 10 List
REASONS AN MRDG
"IS LESS THAN ADEQUATE"

1. Written to support a pre-determined decision!

Just as you should not propose a solution in the description of the situation, you should not write an MRDG to justify a pre-determined decision. To do so would be to bias the analysis and defeat the purpose of the MRA, failing to comply with Section 4(c) of Wilderness Act. The intent of the MRA, documented through the MRDG, is to conduct an objective evaluation of possible alternatives for addressing a situation or issue that is occurring in wilderness. Start your analysis with objective writing in Step 1, the determination of whether any administrative action is necessary. Then in Step 2, be open to detailing and analyzing all possible alternatives, not just a proposed solution you may have in mind. This should help ensure objectivity of your analysis to the extent possible.

2. In Step 2 of the MRDG, the action is not broken down into its discrete components or phases for analysis.

The components of an action provide the basis for comparison between alternatives. Breaking the action into the smallest possible components that may differ by alternative helps identify the minimum activity for each component, reveals hidden effects, and facilitates a meaningful comparison of alternatives. Not doing so results in an insufficient analysis that fails to consider all effects of the action and an MRDG decision that may not be the minimum necessary.

Additional Information:

[MRDG Instructions](#) → Step 2 → Components of the Action

[MRDG Evaluation Guide](#) → Components of the Action



3. Biased statements are used to discount otherwise legitimate alternatives.

When writing your MRDG, justify any statements that appear to be biased; support such statements with facts. For example, it's common to claim horses will cause too much damage. In most cases, this is probably not true and it reveals the writer's preference for an aircraft. But, if a large number of trips will be needed with heavily-loaded pack strings, especially off-trail and in sensitive areas, this could be true. Bottom line: such claims need to be defended or should be omitted.

4. Did not address motorized equipment as a form of development.

When considering motorized equipment in an MRDG, remember that it is a form of development. While you may consider use of motorized equipment to be a temporary development due to the short duration of its use within the wilderness, it will have an effect on the "Undeveloped" quality of wilderness character that should be considered as part of your analysis.

5. Failed to properly apply the word "untrammelled."

This is the most misunderstood word in the Wilderness Act. It is often confused with the word "untrampled" or the biophysical effects of an action. But, *trammeling* is taking action with intent to manipulate the earth and its community of life. It is the very act of interfering with nature, regardless of the consequences. Thus, an *untrammelled* area is one in which humans do not interfere with nature. Untrammelled is synonymous with the word "wild" as we often use it, and indicates the use of restraint by managers. FSM 2320.5 defines untrammelled as an area "where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem." Another definition is provided in "Keeping It Wild: An Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System," which states: "Wilderness is essentially unhindered and free from modern human control or manipulation. This quality is degraded by modern human activities or actions that control or manipulate the components or processes of ecological systems inside the wilderness."

Many believe the untrammelled quality of wilderness character to be first among the other qualities. While the law does not place any more importance on this quality than on the others, it's clear that the word "untrammelled" is central to the purpose and intent of the Act: to ensure the existence of places in which nature is unfettered and self-willed. Paradoxically, wilderness should be managed to be unmanaged. As Howard Zahniser said, "*We are guardians, not gardeners.*"



When analyzing effects to the untrammelled quality of wilderness character in an MRDG, any form of trammeling results in a negative effect. The only way an alternative might positively affect this quality is if it halts an ongoing action, ceasing current manipulations of the earth and its community of life.

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Section 2\(c\)](#)

[MRDG Instructions](#) → Step 2 → Alternative Comparison Criteria → Wilderness Character

6. Did not account for real costs or savings.

Though costs alone cannot be used to justify the selection of an alternative in an MRDG, all alternatives must be financially feasible. And, if two or more alternatives have similar effects to wilderness character, the least expensive one may be selected. So, it's important to accurately account for all direct and indirect costs of each alternative, including: labor, supplies, materials, equipment, and contracts, and even partner contributions – all real costs of the alternative. Similarly, cost estimates should account for real savings as well.

See also FAQ on page 9, above.

7. Complete range of alternatives was not considered.

Similar to a NEPA analysis, when completing an MRDG, a range of alternatives should be considered to guarantee a rigorous analysis. Including an adequate range of alternatives should help to ensure you are not missing a management action that may be attainable and possibly the best solution for preserving wilderness character. At a minimum your alternatives should include, as applicable:

- An alternative that considers use of proposed Section 4(c) prohibited uses,
- An alternative that considers no use of Section 4(c) prohibited uses,
- An alternative that considers a combination of proposed Section 4(c) prohibited uses and no Section 4(c) prohibited uses (e.g. a combination of motorized and non-motorized methods or tools)
- A no action alternative

Think creatively and include all feasible alternatives that will accomplish the objective.

Additional Information:

[MRDG Instructions](#) → Step 2 → Description of Alternatives



8. Effects/impacts were described in Step 1, which is reserved for determining necessity.

It is common for MRDG authors to delve into effects/impacts of a proposed project in Step 1 of the MRDG. It is important to assess the effects/impacts of alternatives under consideration, but necessity of action must be determined before alternatives and their effects/impacts can be considered. Step 1 determines whether administrative action is necessary by describing the issue at hand, examining non-wilderness options for addressing the issue and provisions of law compelling action, including the need to preserve wilderness character. If administrative action is necessary, then Step 2 is conducted to determine the minimum activity. It is at the alternative comparison stage of Step 2 where effects/impacts should be detailed.

Additional Information:

[MRDG Instructions](#) → Step 2 → *Alternative Comparison Criteria*

9. Just because a prohibited use is allowable, does not mean it is necessary.

When considering provisions of law, do not confuse the word “may” with “shall.” And, unless a provision of law specifies a prohibited use, an MRA is still required to ensure that only the minimum means of realizing the provision are authorized. The same is true of existing private rights. When such rights do not inherently prescribe a prohibited use, they may only be exercised by the minimum means.

Additional Information:

[Wilderness Act of 1964 \(PL 88-577\), Sections 4\(c\) and 4\(d\)](#)

[MRDG Instructions](#) → Step 1 → *A. Valid Existing Rights or Special Provisions...*

[MRDG Instructions](#) → Step 2 → *Other Direction*

[MRDG Forest Service Guidelines](#) → *The Wilderness Act and Minimum Requirements*

[MRDG Forest Service Guidelines](#) → *Subsequent Wilderness Legislation*

10. Description of the situation contains a proposed solution.

The purpose of Step 1 of the MRDG is to describe the current situation, which helps to determine if any administrative action is necessary. As such, it is not appropriate to include a proposed solution in the description of the situation. It would be preemptive to propose a solution before determining if action is even necessary. The intent is to describe, as objectively as possible, the situation and/or issue that may or may not warrant action in wilderness. If it is determined that action is necessary, then the proposed solution will come in Step 2 of the MRA process where various alternatives are detailed and the minimum activity is determined.

Additional Information:

[MRDG Instructions](#) → Step 1 → *Description of the Situation*

