

Limits of Acceptable Change Planning in the Selway-Bitterroot Wilderness: 1985 to 1997

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Abstract—In 1985 the Forest Supervisors and staff of the Bitterroot, Clearwater, and Nez Perce National Forests met and agreed to an action plan for implementing a Limits of Acceptable Change (LAC) planning process for the Selway-Bitterroot Wilderness (SBW). The process, which was to include a citizens task force, was to produce a completed management plan in 2 years. Eight years later, in May 1992, the Selway-Bitterroot Wilderness General Management Direction was officially amended to the Forests' forest plans and the implementation phase began. This paper documents the application of the LAC process in the Selway-Bitterroot Wilderness. It assesses the effect of LAC on both the current management of the Wilderness and the condition of the resources within the area.

Between spring 1985 and spring 1992, a group of Forest Service managers representing three National Forests and six Ranger Districts, along with a group of 20 to 30 citizens, met over 40 times to write a management plan for the Selway-Bitterroot Wilderness using the LAC process. The effort culminated in 1992 with a management plan for the Wilderness that addressed recreation, trails, and airfield issues (table 1). Additional issues were to be resolved in smaller groups of citizens and managers over the next 2 years. In spring 1994, concerns by decisionmakers about the Federal Advisory Committee Act and the ties between LAC and the forest plan revision process, led to a decision to temporarily end the planning process for the Selway-Bitterroot Wilderness. Several issues were left unresolved and, as of 1997, the planning process has not resumed.

Citizen's Task Force

The SBW Citizen's Task Force, assembled in November 1987, was composed of researchers and scientists, interested citizens, and resource managers. The membership varied between 20 and 30 people throughout the 8 year planning effort. The Task Force approached all the issues hoping to reach a consensus agreement that would be forwarded to Forest Service decisionmakers. The full Task Force tackled the recreation and trails issues. Later in the process issues were assigned to smaller groups that met separately and reported their progress at monthly meetings of the full Task Force.

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Throughout the process, new members joined the Task Force and old members dropped out. A considerable amount of time was spent educating new participants and briefing them about the group's progress. These changes in membership were inevitable, but more could have been done to bring the newcomers up to speed outside of the regular Task Force meetings. Although members of the Task Force were carefully selected by the Forest Service to reflect all stakeholders, communication between the representative sitting on the Task Force and his or her constituents was often a problem. Several members of the Task Force did not have the necessary communication skills or trust with their constituents to convince them that the deliberations represented the group's concerns.

In 1994, concerns over the Federal Advisory Committee Act led to a decision to move toward a more open public meeting format. The close relationship between members of the Task Force and the Forest Service decisionmakers ended. Although many members of the original Task Force stayed with the process, some of them dropped out with a feeling that their help was no longer wanted. For a few years after this decision, public meetings were well attended, but the special bond between citizens and agency had eroded.

Effect of LAC Management Plan on Current Management

Inventory and Monitoring

As was the case with many wildernesses that applied the LAC process, the Selway-Bitterroot Wilderness had little information about wilderness conditions when planning began. The Task Force made many of its recommendations based on an incomplete understanding of the existing situation. The primary basis for allocating opportunity classes came from existing condition maps drawn from limited field data. Since the plan was written, more field information has been collected. This has been a change for the better. However, some of the new data calls into question some of the assumptions that formed the basis for allocating opportunity classes and for defining standards. There has been a general reluctance to consider changing any of the allocations or standards based on this new information. Despite the fact that the LAC process is a dynamic one, based on feedback from monitoring, it has been difficult to get members of the public and managers to consider modifying the plan.

The indicators designed to monitor resource and social conditions in the Selway-Bitterroot Wilderness were modeled after the standards written for the LAC management plan in the Bob Marshall Wilderness (table 2). Other than the Bob Marshall example, there was limited research and

Table 1—Selway-Bitterroot Wilderness LAC Timetable.

Spring 1985	Forest Supervisors and staff agree on an action plan to develop an LAC-based management plan for the Selway-Bitterroot Wilderness.
Summer 1986	Collection of campsite inventory data.
Fall 1987	Issues identification (Step 1). First meeting of the LAC citizens task force.
Spring 1988	Opportunity Classes defined (Step 2). Indicators selected (Step 3).
Spring 1989	Standards defined (Step 5).
Fall 1989 to spring 1991	Management actions identified (Step 7). Monitoring elements defined (Step 9).
Spring 1992	SBW General Management Direction amended to forest plans. Focused on trails, recreation, and airfields.
Fall 1992 to spring 1994	Work continued on unfinished wildlife and vegetation planning.
Spring 1994	Decision made to “pause” the SBW planning effort. Citizens task force disbanded.

practical experience that could be used to develop unique indicators for the SBW. For this reason, and perhaps because it is easier to adopt what others have done than to invent something new, campsite conditions and encounters with other groups were the indicators selected for the SBW.

Monitoring encounters with other groups and at campsites has proven difficult. Standards are expressed in terms of a probability that a visitor will experience a set of social conditions while in the wilderness—“there is an 80% chance of encountering no more than X parties per day.” Hidden in this relatively simple standard are a host of complex monitoring protocol decisions that had to be made before meaningful data could be collected. It took managers 3 years of trial and error before a set of monitoring protocols were in place that were responsive to the standard and had some level of reliability. Once reliable field monitoring protocols were in place, and wilderness rangers started gathering the

data, managers ran into further difficulties designing a storage and retrieval system so the data were usable for decisionmaking.

Many questions have been raised during implementation of the Selway-Bitterroot Wilderness plan relating to the usefulness of campsite conditions and encounters as key indicators. Are they responsive to the unique goals and objectives for the area? How do encounters experienced by wilderness rangers in the course of their job duties relate to the user’s experience? Are there better indicators that would measure those attributes that make the SBW unique in a regional and national context?

Management Methods List

The Selway-Bitterroot Wilderness management plan uses a list of “possible management methods” to serve as a menu of possible actions for managers to select from if existing conditions violate LAC standards. They are listed in order of management preference. The light-handed actions (such as education, discouraging users through signing, and so on) are “most preferable,” while the heavier-handed actions (such as closures, permit systems, and so on) are considered “least preferable but still acceptable.” The management plan elaborates further on the use of these management methods, stating, “In general, methods assigned as least preferable should not be used unless other light-handed methods have been tried unsuccessfully.”

This list poses many dilemmas for managers. As Cole (1995) points out, the assumption that direct controls have a negative effect on visitor experience or that indirect controls are less obtrusive to the visitor is not universally supported by research findings. In fact, Cole argues that visitor freedom may be enhanced by applying a direct control as opposed to placing restrictions on where visitors can go and what they can do when they get there. There is also the question of effectiveness. By the time managers have exhausted the indirect controls and must resort to more direct actions, the resource may have been severely impacted.

In the Seven Lakes area of the Selway-Bitterroot Wilderness, managers have attempted to avoid limiting use in their efforts to reduce the number of campsites and improve the condition of the sites. They have selected a number of less heavy-handed actions from the management methods list.

Table 2—Standards for site and social indicators in the Selway-Bitterroot Wilderness.

Indicator	Opportunity Class			
	1	2	3	4
Maximum number of sites per square mile				
Light impact	1	1	2	1
Moderate impact	0	1	1	2
Heavy or extreme impact	0	0	0	1
Maximum number of sites per square mile	1	2	0	4
Maximum number of other parties encountered per day, 80 percent of the time	0	0	2	5
Maximum number of other parties camped within sight or sound, 80 percent of the time	0	0	1	2

Visitors are restricted in their choice of camping location, stock tying location, and group size. Signs are posted at the trailhead and along the trails leading into the lake basin. Other lake basins within the Wilderness have degraded conditions similar to the ones found at Seven Lakes. Managers feel compelled (because of the language in the management plan) to approach the problem with indirect techniques without even considering what may be a more effective and perhaps less obtrusive direct control.

The intent of the “possible management methods” list was to serve as a menu of options from which managers could choose. This list may have become a crutch for both the public and managers during the planning process. Users may have assumed that relatively benign indirect techniques would be sufficient to deal with most violations of standards. They chose quite stringent impact standards with little apparent recognition of how their access and wilderness experience might be affected by the actions needed to achieve these conditions. More serious consideration of direct controls during the planning process might have helped participants understand the potential consequences of the standards they set for the Selway-Bitterroot Wilderness.

Prevention of Significant Deterioration

The Selway-Bitterroot Wilderness management plan includes a goal that is commonly referred to as the Prevention of Significant Deterioration, or PSD. The defined intent of this goal is to “prevent a net degradation of the wilderness resource....” This goal could contradict the idea of setting “standards” in the LAC process where conditions can be allowed to deteriorate further, until a minimally acceptable condition is reached. One way for the two concepts, PSD and LAC, to work together would be to set standards that reflect current conditions. This may have been the intent of the Task Force when they adopted the PSD language, because the management plan generally reflects an intent to preserve existing conditions. Alternatively, the two concepts could work together by making certain that places where conditions were allowed to deteriorate (by writing standards less stringent than current conditions) were offset by places where they were to be improved (by writing more stringent standards). This scenario is already taking place. Some areas are improving while others have deteriorated somewhat. Including both PSD and LAC standards remains a point of confusion for both managers and the public.

Opportunity Classes

The Selway-Bitterroot Wilderness management plan defined four Opportunity Classes in terms of their resource, social, and managerial setting. Opportunity Class 1 is the most pristine and unmodified and represents almost 98 percent of the area. Opportunity Class 4 has a relatively higher amount of use and associated impacts. It represents less than 1 percent of the area. Opportunity Classes 3 and 4 are described in gradations between Opportunity Classes 1 and 4. Most of the system trails and popular camping locations are in Opportunity Class 3.

The opportunity class descriptions serve to prescribe, in general terms, a desired future condition for the Wilderness. The opportunity class definitions do not address the unique attributes of the Selway-Bitterroot Wilderness in the context of other wildernesses in the region or compared to the National Wilderness Preservation System as a whole. One can piece together a broad vision of the Selway-Bitterroot Wilderness by examining how the opportunity classes were allocated on the ground and the standards that were assigned to each opportunity class. What emerges is a management plan that generally reflects the existing condition, both in terms of use levels (social) and campsite conditions (resource), at the time the planning process was under way (1985 to 1992).

Exceeding Standards—Yellow Light or Red Light?

The Selway-Bitterroot Wilderness management plan does not specifically address the question of whether violating a standard requires immediate action or further study. Disagreement exists among managers. Without clear policy in the management plan, different philosophies have emerged about what to do with the more than 120 areas in the Wilderness that exceed one or more standards. Some districts aggressively manage sites that violate standards while other districts do not.

Barriers to Implementation

Disagreements Among Managers

Acceptance of the LAC plan by managers of the Selway-Bitterroot Wilderness has been inconsistent. Many of the managers that were involved in the LAC planning process are strong supporters of the plan and its implementation. Other managers feel that the LAC planning process was flawed. This group’s reluctance to accept the conclusions of the planning process (the SBW management plan) has made consistent implementation difficult. The number of administrative units involved in the management of the Wilderness and their physical isolation from each other exacerbates this problem. In 1992, a coordinator position was created whose primary responsibility was to ensure consistent implementation of the LAC plan across the six ranger districts and four National Forests that manage the Selway-Bitterroot Wilderness. District and Forest staff were organized into coordination teams, each with a specific role ranging from policy making to field monitoring. The coordination structure evolved as budgets and personnel changed, but the challenge remained the same: consistent management of the Wilderness according to the LAC management plan.

Effects Disclosure

When the LAC plan was amended to the forest plans in 1992, a procedural exclusion was used to eliminate the requirement of the National Environmental Policy Act (NEPA) to disclose the potential effects that may result from

the plan's implementation. The use of this exclusion meant that an Environmental Assessment (EA) or Environmental Impact Statement (EIS) was not needed. It is in an EA or EIS where decisionmakers and the public can read about the various management strategies (alternatives) and the consequences and trade-offs of each of those strategies. Because there was only one management strategy for the Selway-Bitterroot Wilderness (the one that emerged from the consensus-based LAC process), decisionmakers and the public could not contrast various ways to manage the area and the consequences of each. Consequently, there is no official record documenting the decisions made during the LAC process and the deliberations of the Citizen's Task Force. When managers and citizens who were originally involved in the LAC planning effort leave, there will be no official documentation of the planning process for new managers to rely on to support their decisions. The decision to not write an EA or EIS was a significant procedural flaw in the planning process because it did not provide the legal underpinnings that will be necessary to support future management decisions.

Implementation of the Plan

"What do we do now?" is an often-repeated phrase at SBW coordination meetings. Over 120 sites do not meet the standards set by the LAC process, but there is little direction and few criteria to help managers prioritize which sites to tackle first. The mechanics of the LAC planning process were well thought out, but managers did not spend enough time thinking about implementation of the plan. The potential effects on the Wilderness users from the management actions that will be necessary to comply with LAC standards were hardly discussed. This was primarily because the consequences of the "most preferable" education management action were relatively benign to users. If wilderness conditions were not meeting the standards, managers would simply apply an education strategy to the problem. Focusing more on implementation may have led to more attainable standards or would have at least provided users with realistic expectations about the consequences of meeting the standards, in terms of increased restriction.

A Wilderness Implementation Schedule (WIS) was developed in 1993 that outlined the cost of fully implementing the LAC plan in the Selway-Bitterroot Wilderness over a 5 year period. The WIS provided a good overview of costs, but it did not establish priorities or help focus work on the ground. For that reason the Selway-Bitterroot Wilderness WIS was not widely used in project planning.

Public Involvement

The Federal Advisory Committee Act (FACA) became an issue in 1994. The Forest Service had just become aware of the law, and local decisionmakers were uncomfortable with the way citizens were involved in the Selway-Bitterroot Wilderness planning process. Shortly after the management plan was completed, the Citizen's Task Force was disbanded in favor of a more open public meeting format. Many long-time members of the Task Force became disillusioned with the Forest Service and dropped out of the planning process.

The close working relationship that had developed between the agency and a group of citizens was damaged. Managers lost the close contact with a group of citizens that were advocates for the agency—a group that could have been allies during implementation of the LAC plan. Another reason the citizen's group was disbanded was because members of the group wanted to be involved in project-level decisions. Some decisionmakers felt that including citizens in implementation decisions was inappropriate.

Lessons Learned and a Look to the Future

The primary benefit of the LAC planning process has been the incorporation of goals, objectives, and monitoring elements for the Selway-Bitterroot Wilderness into forest plans. In theory, and often in practice, management projects and decisions are linked directly to the goals and objectives developed from the LAC process and now incorporated into the forest plan.

The goals and objectives described in the SBW management plan are not perfect. They describe an area that is fairly generic among wildernesses in the Northern Rockies. The plan does not articulate the features (experiences and resource conditions) that make the Selway-Bitterroot Wilderness unique and worth preserving. During the next round of forest planning it will be important to take the LAC plan a step further by describing in more detail what role the Wilderness plays in the region and nation. When those unique attributes of the Selway-Bitterroot Wilderness are described, managers may realize that the current plan is based on the wrong indicators or that additional indicators are needed. For instance, one could describe the Selway-Bitterroot Wilderness as unique because of the opportunity for fires to burn unrestricted by humans. If unrestricted fire is a process that warrants protection, managers will need to design monitoring protocols for indicators that differ from the current ones focused on campsites and visitor encounters.

The bond that occurred between users, citizens, and agency people during the LAC process was highly significant. After years of face-to-face discussions about perplexing and complex issues, a group of people with varied backgrounds and values agreed on the best way to manage the Selway-Bitterroot Wilderness. The LAC process provided the framework that brought people together to share their experiences and knowledge. The process produced a planning document, but it also helped people with varied positions on the issues understand that there were no easy answers. The compromises that created the management plan required that each member of the Citizen's Task Force understand the issues and empathize with the views of their fellow citizens. The group became not only experts in forest planning, but they became stronger wilderness supporters and agency champions. This kind of relationship could only have been built through dialogue and by taking the time that the LAC process requires.

Reference

Cole, David N. 1995. Wilderness management principles: science, logical thinking or personal opinion? Trends. 32(1):6-9.