



USDA Forest Service
Attn: Appeal Reviewing Officer
1400 Independence Ave., SW
EMC, Mailstop 1104
Washington, DC 20250
email: appeals-chief@fs.fed.us

September 17, 2018

RE: Record of Decision for the Coronado National Forest Land and Resource Management Plan.

Dear Appeal Reviewing Officer,

The Wilderness Society is pleased to see a Record of Decision (ROD) for the Coronado National Forest Land and Resource Management Plan (MB-R3-05-17; April 2018). The Plan revision process has been a lengthy one and it is good to see this important event.

We are also pleased to see some positive changes--particularly the inclusion of additional recommended wilderness areas--in the modified proposed action. We have some concerns regarding the ROD and the recommended wilderness areas' number and boundaries. We also are concerned about the possibility of any reductions in recommended wilderness that might occur through the appeals process. However, we read in the ROD:

Recommendations for designations such as additions to the National Wilderness System are preliminary administrative recommendations that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and/or the President of the United States. The Congress has reserved the authority to make final decisions on wilderness on federal lands; therefore, wilderness recommendations in the revised plan are not appealable under the agency's administrative appeal procedures (Section 4 of the Optional Appeal Procedures).

source: <https://www.fs.usda.gov/detail/coronado/landmanagement/?cid=fseprd583120>
(emphasis added).

Our interpretation of the ROD is that issues pertaining to recommended wilderness areas in the revised plan are not subject to appeal. Consequently, we will not be filing an appeal and we do

not anticipate the need to intervene in any appeals that oppose the plan's wilderness recommendations. If our interpretation is incorrect and any appeals of the wilderness recommendations are, in fact, received and accepted, The Wilderness Society will seriously consider intervening in those appeals.

We look forward to assisting the Forest Service in the implementation of the Plan and to continue working closely on projects on-the-ground.

Sincerely,



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CC (by email only):

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