



ARTHUR CARHART NATIONAL WILDERNESS TRAINING CENTER

# MINIMUM REQUIREMENTS DECISION GUIDE OVERVIEW

*“...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act...”*

– The Wilderness Act of 1964

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## Introduction

The Minimum Requirements Decision Guide (MRDG) is designed to help wilderness managers comply with the fundamental tenets of the Wilderness Act of 1964 and make appropriate and defensible wilderness decisions. Use of the MRDG requires some familiarity with wilderness, as defined by the Wilderness Act of 1964.

This overview document provides general information about the MRDG process, its origin, and how it relates to other processes such as NEPA analyses. Please refer to the accompanying *MRDG [Instructions](#)* and *MRDG [Workbook](#)* for specific information about completing the MRDG.

## Wilderness Act Guidance

The concept of “minimum requirements,” sometimes called “minimum necessary,” was derived from Section 4(c) of the Wilderness Act:

“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.” (emphasis added)

Actions that might be subject to an MRDG include, but are not limited to: scientific monitoring, research, wildlife management, recreational developments (trails, bridges, signs, etc.), and activities related to special provisions mandated by the Wilderness Act or subsequent legislation (such as grazing, mineral rights, access to inholdings, maintenance of water developments, and commercial services).

The following excerpts from the Wilderness Act of 1964 may also be useful reminders of key provisions of law that are applicable to the use of the Minimum Requirements Decision Guide.

## **What is the purpose of wilderness?**

“In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States..., leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness.” Section 2(a)

## **What is wilderness?**

“...lands designated for preservation and protection in their natural condition...” Section 2(a)

“...an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation...” Section 2(c)

“...generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable...” Section 2(c)

“...has outstanding opportunities for solitude or a primitive and unconfined type of recreation...” Section 2(c)

“...may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” Section 2(c)

## **How is wilderness administered?**

“...shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness...” Section 2(a)

“A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain.” Section 2(c)

“An area of wilderness is... protected and managed so as to preserve its natural conditions and... its preservation and use in an unimpaired condition...” Section 2(c)

“...each agency administering wilderness... shall be responsible for preserving the wilderness character of the area...” Section 4(b)

“...wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” Section 4(b)

In addition to the Wilderness Act, subsequent legislation and agency policies may influence a determination of the minimum requirement. In some instances, agencies have developed additional guidance and definitions in their respective policies. Please see [Agency Guidelines](#) for more specific agency information.

## Use of this Guide

The MRDG is a process to identify, analyze, and recommend management actions that are the minimum necessary for wilderness administration. It applies this direction from the Act and incorporates a two-step process. Step 1 determines whether administrative action is *necessary*. If action is found to be necessary, then Step 2 provides guidance for determining the *minimum* activity. The minimum activity is sometimes referred to as the minimum “tool” but could include any type of activity, method, or equipment.

The MRDG can be used as:

- a process for evaluation and documentation;
- a guide to help discuss proposals with interested parties; or
- a review of on-going management practices to determine if they are necessary or if a less intrusive practice can be implemented.

The level of detail and effort necessary to effectively utilize the MRDG process depends on the scope and complexity of the issue or problem being considered. One person might adequately analyze simple actions; complex actions may require the coordination of several resource specialists. Likewise, some issues warrant public involvement to provide information, gather input, and result in a better determination.

The MRDG worksheet poses a series of questions to determine the necessity of taking action to resolve a situation and the most appropriate methods to use. Management actions can have profound implications for wilderness character and often require careful consideration of effects and tradeoffs to ensure it is preserved.

## Emergencies

Do not use the MRDG for emergency situations; follow procedures prescribed in approved emergency plans or agreements. The minimum requirements concept should be incorporated into these documents when they are prepared, so that only the minimum necessary is being utilized to meet the needs of an emergency.

## The MRDG and NEPA

Agency NEPA guidance does not necessarily require a process to determine if administrative action in wilderness is necessary, or to select the minimum activity. The MRDG provides a method for determining the necessity of an action and identifying the alternative that best preserves wilderness character. In contrast, a NEPA analysis discloses and compares the environmental effects of alternatives, documents a decision, and requires public involvement. Note that an MRDG determination is not the same as in a NEPA decision, but rather a “finding” and a recommended course of action.

The Minimum Requirements Decision Guide can help inform a NEPA analysis, if required, but is not a substitute for a NEPA analysis. Portions of the MRDG may be transferable to a subsequent NEPA analysis as shown below.

## Process Comparison

Minimum Requirements Decision Guide	NEPA Analysis
<b>STEP 1:</b> Determine if action is <i>necessary</i> .	
Describe the situation.	Purpose and Need for Action, Issues, and Affected Environment
Valid Existing Rights or Special Provisions, Other Legislation, or Wilderness Character (Step 1A-C).	Existing Management Direction
<b>STEP 2:</b> Determine the <i>minimum</i> activity.	
Other Direction	Existing Management Direction
Description of Alternatives	Proposed Action and Alternatives
Effects to Wilderness Character	Environmental Consequences
Alternatives Not Analyzed	Alternatives Considered but Eliminated
Determination and Rationale	Record of Decision (Decision)
Monitoring and Reporting Requirements	Record of Decision (Mitigation Measures)

## The MRDG and Planning

The degree to which the MRDG can be useful in the planning process will vary according to the scope of the process and the objectives of the plan. Below are the three typical planning levels in use by agencies and suggested uses of the MRDG.

Planning Level	Use of the MRDG
<p><u>Comprehensive Land Use Planning</u> (i.e. forest plans, park plans, refuge plans, resource management plans, and wilderness management plans)</p> <p>- Establish or modify desired condition, general unit standards or guidelines, and/or make land use allocations.</p>	<p>Use the MRDG to help screen alternatives in anticipation of the need to authorize actions in the future, while ensuring the continued preservation of wilderness character.</p>
<p><u>Programmatic Planning</u> (i.e. monitoring plans, fire plans, search and rescue and other "incident" plans or agreements)</p> <p>- Analysis of multiple, similar or routine project proposals or activities (trail maintenance, monitoring, dam maintenance, etc.) in a single document.</p>	<p>Use the MRDG to prepare a single analysis for similar, current, and/or future actions where the social and biophysical values and potential effects will be nearly identical.</p> <p>Create a "decision tree" or "GO/NO-GO checklist" to be able to assess the necessity for action involving Section 4(c) prohibited uses as similar needs arise in the future.</p>
<p><u>Project or Site Specific Planning</u> (i.e. wildlife surveys, trail reconstruction, research proposals, weed treatment)</p> <p>- Analysis of site-specific or non-recurring actions.</p>	<p>Use the MRDG to determine if administrative action is <i>necessary</i> and, if so, determine the <i>minimum</i> activity.</p>

## The Spirit of the Wilderness Act

Limited budgets and conflicting priorities for staff and crew time make implementing the minimum requirements provision of the Wilderness Act more challenging. It's tempting to craft an MRDG to justify the use of motorized equipment, or other prohibited uses, to expedite work or cut costs. However, such decisions degrade wilderness character and violate the letter and spirit of the Wilderness Act. To honor the purpose of the Act, to secure the benefits of wilderness, wilderness decisions should not be taken lightly.

The central mandate of the Wilderness Act is to preserve wilderness character. And, the National Wilderness Preservation System was established, in part, to guard against the threat of "growing mechanization" and to provide areas "in contrast" with other lands where human activities and the trappings of modern civilization dominate the landscape. The Act contains no provision that allows the use of "faster, cheaper, and easier" as criteria for authorizing any of the prohibited uses. The only criteria are that such uses are the minimum necessary for the wilderness administration and that wilderness character is preserved. Agency policies may define or even expand upon these criteria. The MRDG can help managers make defensible wilderness decisions, if it is used as an analytical tool, and not as a justification for a predetermined decision or simply as a form for rubber-stamp approval.