Along the high-elevation, wind-swept ridges of the West, a long-lived, gnarly-branched pine is in trouble. A species of stone pine known for its high stress tolerance and adaptability, whitebark pine is slow-growing and can live between 500 – 1,000 years. Lacking wings for wind-dispersal, its calorie-dense seeds are spread primarily by Clark’s Nutcracker, a member of the crow family with a specialized bill for extracting large seeds from pine-cones and a pouch under its tongue for stashing and carrying seeds long distance. Those seeds are a prized food source for a range of species, including the imperiled grizzly bear.

As tough as the species is, whitebark pine is facing mounting pressures from climate change, decades of fire suppression, blister rust, mountain pine beetles, and competing conifers migrating to higher elevations in response to warming temperatures. Already found at high elevations, many worry that whitebark pine will have nowhere to run.

This cocktail of stressors has landed whitebark pine on the short-list for federal listing under the Endangered Species Act. Unfortunately, the proposed listing rule allows logging and other “forest management” activities in whitebark pine habitat, and is, per usual, loudly silent on actions that might address the underlying causes of global warming. Instead, it focuses heavily on intervention and manipulation strategies—like selectively breeding and planting blister rust-resistant trees, pruning and thinning stands, fighting back other migrating conifers with logging, applying insecticides and pheromones, and even wrapping pinecones in wire mesh to keep red squirrels and Clark’s Nutcrackers from getting at the seeds.

This is a familiar story. Humans are exceedingly bad at exercising restraint and simply not doing things. Rather than drastically reducing consumption, travel, recreation, and development—things that take real personal and political sacrifice but create space for other species to exist—we put an enormous amount of effort into developing technologies that enable us to continue with business as usual or at least provide a veil of plausible deniability regarding our impact on the world. Slap enough windmills on the hilltops, and we’ll never have to slow down. Gather enough data on wildlife, and we can invade their space with abandon. Or, worst case, fire up the helicopters, pluck the critters from their homes, slap tracking collars on their necks, and drop them elsewhere.

There is a deep tendency to treat everything as if it is merely an engineering challenge that is solvable with enough data and ingenuity (and money).

This is not to say we shouldn’t pursue things less harmful than our current things—we’ve dug quite an overwhelming hole with climate change, and we need to be creative in how we deal with it. But too often our efforts are tunnel-visioned on maintaining the status quo, and the tougher conversations about how we exist on this planet are altogether muted.

Take for instance grizzly bears. A widely cited research paper states that “[h]umans are the primary agent of...
A while back I received an email from the founders of a recently established organization that was created out of a concern for the “wilderness visitor.” They wrote to challenge Wilderness Watch's long-time insistence that the fundamental mandate in the Wilderness Act requires managers to—first and foremost—protect each area’s wilderness character. They claim WW’s position misinterprets the law, has incorrectly shaped the views of much of the conservation community and, to the degree we influence the federal agencies, caused them to protect Wilderness from the people.

The gist of their argument is that Wilderness was established to provide recreation opportunities, and that the emphasis many put on protection is diminishing the recreational opportunities that Wilderness affords. To bolster their view they point to language in the law, repeated three or four times, that says wilderness areas “shall be administered for the use and enjoyment” of the American people. The law’s protection requirements, according to their point of view, are operative to the degree they don’t unduly interfere with the overarching purpose of providing recreational opportunities.

I’ve heard variations of this argument before. A long-time wilderness advocate once tried to convince me that recreation was the chief purpose of the Wilderness Act, and as proof offered that the Act uses the words “use and enjoyment” or “recreation” a combined seven times, while “protect” or its derivatives are used only five. I replied that since the Wilderness Act uses the word “mining” 11 times, maybe it was mining, not recreation or protection that the Act sought to achieve! It ended that discussion, but obviously hasn’t ended the debate.

The purpose of the Wilderness Act was never lost on the Act’s architect and supporters. Testifying to Congress in 1962, the law’s chief author and lobbyist Howard Zahniser, explained, “The purpose of the Wilderness Act is to preserve the wilderness character of the areas to be included in the wilderness system, not to establish any particular use.” This directive was codified in the statute with the clear mandate that

“[e]ach agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character.”

The benefits of “use and enjoyment” of Wilderness were also high on Zahniser’s list, but the concept wasn’t merely synonymous with recreation. He understood the phrase in a much more expansive and meaningful way. Responding to a critic who claimed it was rather selfish to set aside large areas for the limited few who would use them, Zahniser insisted that those who sought out wilderness deserved the opportunity to experience it, but he also explained that the use and enjoyment extended to “many people who never even hope to explore it...they find relief and inspiration in the wilderness vicariously, and a consciousness of its existence is essential to them. This may be hard to explain, but the people I know who want the wilderness saved for these reasons greatly outnumber those I know who want the wilderness saved for their own excursions.”

None of this suggests recreation isn’t an important public purpose of Wilderness. To many of us our time spent in Wilderness is essential to our being. But Wilderness is valuable for many reasons, including for its own sake; it doesn't derive its value from us. Wilderness can exist and thrive without recreation, and indeed some areas do, but for us to have an authentic wilderness experience there has to be a real Wilderness to enjoy.

—George Nickas

*Quoted from “The Wilderness Writings of Howard Zahniser,” by Mark Harvey. A must read for wilderness advocates who want to understand more about the person, the ideas and the language underpinning the Wilderness Act.
death” for grizzlies. We know this. When humans and bears mix, bears end up dead. So, areas with less human access and activity (e.g., recreation, logging, fast-moving cars and trains, etc.) are areas with fewer dead bears. And in areas with greater human activity, we surely need greater tolerance (and compassion) for bears. As with so many other species reacting to rapidly changing conditions, we need to provide grizzlies with the space to move and adapt, and we need to keep open minds about what that might look like. Yet, in the whitebark pine listing rule, the Fish and Wildlife Service downplays the importance of whitebark pine as a food for grizzlies calling them “opportunistic feeders.” But whitebark pine is often found in remote, high elevation sites away from humans. When whitebark pine seeds are scarce, bears search out other food, which often brings them into lower elevations and in closer contact with humans. We don’t much care for the idea of sharing our favorite creek-side trail with a berry-munching grizzly or dealing with potholes in our golf courses from a bear digging up earthworms, so when an “opportunistic” bear ends up in our space, we trap, the bear and move him back to his allotted “recovery zone.” And if the bear crosses our line in the sand again—looking for food, or a mate, or a new home—we kill him, and we go to great pains gathering more data and rationalizing all the reasons why this is the way of things, why we don’t need to change our own behavior or ask, “What gives us the right?” These tendencies toward control and entitlement make our collective agreement on Wilderness pretty remarkable. Wilderness is a conscious reflection of human restraint—a place where we decided there is value in Nature’s own wild order, in the autonomy and freedom of the wild, and in allowing the land to play whatever hand it is dealt without our intentional interference. It is a recognition that we don’t and can’t know everything and that we might learn something if we step back and observe what happens when we don’t impose our will. Because of this, surprisingly, Wilderness is some of the best habitat left for species trying to eke out an existence alongside humans. The idea of Wilderness as a self-willed landscape has been a difficult one for land management agencies. They have an ingrained history of modifying public lands to achieve “desired conditions,” an idea laden with value bias even in the best of times. Throw climate change and all of its uncertainties into the mix, and the increasing urge to actively maintain static conditions becomes all the more problematic. Even though the agencies often resist it on the ground, their policy guidance reflects the value in Wilderness. Agency guidance states, “Wilderness areas are living ecosystems in a constant state of evolution[.]” and “[i]t is not the intent of wilderness stewardship to arrest this evolution in an attempt to preserve character existing” at some prior time. And, “A key descriptor of wilderness in the Wilderness Act, untrammeled refers to the freedom of a landscape from the human intent to permanently intervene, alter, control, or manipulate natural conditions or processes.” And, “Maintaining wilderness character requires an attitude of humility and restraint. We preserve wilderness character by … imposing limits on ourselves.” In Wilderness, we “[p]rovide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist.” Agency policy is taking a notable turn. One agency stated its “policy prior to climate change was to take a ‘hands-off’ approach where overt human influences were not the primary reasons for population fluctuations.” It now believes its role is shifting to adaptive management to maintain “natural conditions,” and this conversation is growing across the agencies. This—at its core—is a conversation about whether we will allow Wilderness to persist into the future. This shift is reflected in the proposed whitebark pine rule. It lists Wilderness under “Challenges to Restoration,” setting the stage for conflict between an imperiled species and an imperiled landscape. But this is likely a false conflict. Roughly 29 percent of whitebark pine habitat is in Wilderness. Given the variables and unintended consequences inherent in manipulations, that 29 percent should be set aside as an important baseline for comparison to our tinkering elsewhere. The listing rule acknowledges “a high degree of uncertainty inherent in any predictions of species responses to a variety of climate change scenarios. This is particularly true for whitebark pine given it is very long lived, has a widespread distribution, has complex interactions with other competitor tree species, relies on Clark’s nutcracker for both distribution and regeneration, and has significant threats present from disease, predation, and fire.” It also acknowledges “[t]here is no known way to control, reduce, or eliminate either mountain pine beetle or white pine blister rust…particularly at the landscape scale needed to effectively conserve this species.” In fact, “the vast scale at which planting rust-resistant trees would need to occur, long timeframes in which restoration efficacy could be assessed, and limited funding and resources, will make it challenging to restore whitebark pine throughout its range. One estimate indicates that if planting continues at its current pace, it would take over 5000 years to cover just 5 percent of the range of whitebark pine[.]” This does not appear to be a scenario where we have to grapple with fine lines. There is no discrete, human-caused disruption in Wilderness that can be corrected with a discrete, short-lived intervention. This is not an errant patch of spotted knapweed along a stock trail that can be pulled. But it is illustrative of the moral and ethical questions coming our way. Climate change will continue to cause vast changes in the world as we know it, and we will see more attempts to mitigate the effects through ongoing, counterbalancing manipulations. The question will be whether we lose Wilderness in the process. 

Dana Johnson is the staff attorney for Wilderness Watch.
On the Watch

Close grazing allotments in Absaroka-Beartooth Wilderness

The Forest Service (FS) needs to drop its proposal to re-open two long-vacant cattle grazing allotments in the Absaroka-Beartooth Wilderness. Its “East Paradise Range Allotment Management Plan” includes steep and unsuitable allotments closed to grazing for 20 years.

Bordering Yellowstone National Park, the Absaroka-Beartooth is a spectacular part of the Greater Yellowstone Ecosystem in Wyoming. Its rugged peaks, alpine meadows, and dense forests are habitat for grizzly bears, moose, mountain goats, bighorn sheep, pikas, wolves, and other native wildlife.

Cattle grazing would harm the Wilderness, its watersheds, and native wildlife. Fencing and water developments that accompany grazing would adversely impact existing habitats and protected species, and their construction/reconstruction could involve motorized tools and equipment. Additionally, cattle grazing would directly reduce native forage available for wildlife, damage vegetation and riparian areas, degrade water quality, and spread invasive weeds.

The FS should permanently close the two Wilderness allotments, along with four other allotments, which are low-elevation lands critical for native wildlife, in roadless areas adjacent to and proposed for addition to the Wilderness.

Labyrinth Canyon threatened by helium drilling

The Bureau of Land Management (BLM) has approved a helium drilling project in the heart of the Labyrinth Canyon Wilderness in southern Utah. BLM issued a mineral lease just a month before the Wilderness was formally designated as part of the largest wilderness bill of the last 10 years (the Emery County Public Land Management Act, signed into law as part of the John D. Dingell Jr. Conservation, Management, and Recreation Act on March 12, 2019). The BLM had full knowledge that lands encompassing the leased area would soon be designated as Wilderness—but went ahead and issued the lease anyway.

The Labyrinth Canyon section of the Green River, designated as “Scenic” under the Wild and Scenic Rivers Act, is one of the most iconic, remote, and world-renowned river stretches in the United States.

The project is currently in the courts. If allowed to proceed, it would involve months of extensive construction in this remarkably quiet and remote place, including, at a minimum, road improvements (upgrading and graveling existing two-tracks that “cherrystem” into the Wilderness), well pad construction and infrastructure, pipelines, and a 10-acre processing facility on nearby school trust lands. At least two helium wells would be drilled, with many of the same on-the-ground impacts as conventional oil and gas drilling. The company would likely request further development of the leases, which would lead to more development, including within the Wilderness.

Alpine Lakes Wilderness be damned

The Alpine Lakes Wilderness, in the famously scenic central Cascade Mountains in Washington, is threatened by a proposed rebuild of the Eightmile Dam by the Icicle and Peshastin Irrigation Districts (IPID). The low-level 90-year-old dam was built before the area’s wilderness designation.

The irrigation district is proposing helicopters to transport materials and equipment, and/or cutting a road through the Wilderness and driving earthmovers in. It could increase the size of the dam and the amount of water diverted from the lake, despite the disputed extent of IPID’s water rights. Similar proposals may affect other locations in the Wilderness. We’re opposing the State’s flawed environmental review process that overlooks the national interest in the area’s wilderness designation and threatens to harm the Alpine Lakes Wilderness not only at Eightmile Lake, but at locations of other small dams elsewhere in the Wilderness.
Wilderness Watch is urging the Bureau of Land Management (BLM) to drop its ill-conceived proposal to spray herbicides across and burn up to 1.3 million acres of public lands in Arizona, including tens of thousands of acres of the Aravaipa Canyon, Dos Cabezas Mountains, Fishhooks, North Santa Teresa, Peloncillo Mountains, and Redfield Canyon Wildernesses. These rugged and remote desert Wildernesses are important habitat for native wildlife.

BLM’s attempt to control the type and location of vegetation in these Wildernesses fails its obligation to preserve wilderness character, which requires allowing natural processes to determine on-the-ground conditions. BLM’s plan might also include using helicopters to ignite fire and chainsaws to cut down “unwanted” vegetation.

Meanwhile in Wyoming, the Forest Service (FS) has issued a Categorical Exclusion (CE)—bypassing proper environmental analysis or public input—to burn up to 1.7-plus million acres of the Targhee National Forest, which is part of the Greater Yellowstone Ecosystem and critical habitat for native wildlife such as wolves and grizzly bears. Burning would impact the Palisades Wilderness Study Area (WSA), plus Recommended Wilderness and Inventoried Roadless Areas. Additionally ignoring its mandate to preserve wild character, the FS could use helicopters or mechanical treatment (tree cutting) in the WSA.

This is exactly the kind of manipulation we’ll always fight to keep out of Wilderness, and that the architects of the Wilderness Act sought to prevent and warned against when they described the role of wilderness stewards as “guardians, not gardeners.”

Under a new Bureau of Land Management (BLM) plan, more people will be allowed in fragile areas of the Paria Canyon-Vermillion Cliffs Wilderness in Arizona, specifically the Wave and Coyote Buttes North. This area of spectacular slot canyons, geological wonders, and rare species like desert bighorn sheep was one of the first areas BLM recognized for its wilderness values when it established the Paria Canyon Primitive Area in 1969.

Starting in February, BLM more than tripled daily visitor use, from 20 to 64 people, and could allow 96 people per day in the future. BLM is considering drilling into rock to place trail markers and installing an emergency satellite phone at the trailhead, no doubt anticipating more problems from more visitors. Additionally, BLM is proposing to increase parking at other trailheads, which could lead to overuse in other fragile areas of the Wilderness that do not currently have the name recognition of the Wave, and which still offer a relatively primitive experience.

BLM, in its final Environmental Assessment (EA), acknowledges the trend of inexperienced wilderness visitors—lacking basic backcountry ethics, skills, and navigation—focused on “attractions” such as the Wave, and less on wilderness qualities such as solitude, and an undeveloped natural experience. BLM’s recent decision has nothing to do with protecting Wilderness, but serves to inappropriately accommodate increasingly excessive visitor use at the expense of wilderness values.
Wilderness in the Courts

Predator Killing in Wildernesses, Alaska

We have good news to share about protecting brown bears in the Kenai National Wildlife Refuge and Wilderness. We’ve been updating you about our ongoing litigation supporting two 2015 rules aimed at protecting predators in National Wildlife Refuges, National Preserves, and Wildernesses in Alaska—a Fish and Wildlife Service rule (“Kenai rule”) and a broader National Park Service rule. These rules banned the most barbaric hunting practices authorized by the Alaska Board of Game’s “intensive management” law with the Kenai rule specifically banning brown bear baiting in the Kenai Refuge and Wilderness. Safari Club International, Alaska Professional Hunters Association, and the State of Alaska challenged both rules in court claiming federal overreach. We intervened in the lawsuits to help defend the rules, and in November, a federal judge ruled in our favor in the Kenai lawsuit upholding the ban on brown bear baiting. The suit over the 2015 Park Service rule is still pending.

While this is great news for brown bears living in the Kenai Wilderness, the battle is far from over. Safari Club and others have appealed our favorable Kenai court opinion, so we are defending it in the Ninth Circuit Court of Appeals. And last year, the Trump administration issued a Park Service roll-back rule, essentially nullifying the protections afforded by the 2015 Park Service rule. The Trump administration was also working on a Kenai rollback rule, but that rule has yet to be finalized. The new rule would allow brown bear baiting, would open more of the refuge to trapping with fewer restrictions, and would allow more access for snowmobiles, bicycles, and ATVs in non-wilderness portions of the Refuge. We filed suit to challenge the Park Service’s new roll-back rule in August, and we’re keeping a close, hopeful eye on what the Biden administration will do with the pending Kenai rollback rule. Whatever happens, we’ll respond with a strong, coordinated fight to protect these incredible wild places and the wild ones who live there.

Oil and Gas Drilling in the Arctic, Alaska

In August, we joined a coalition of groups in a lawsuit against the Department of Interior for opening the entire coastal plain in the Arctic National Wildlife Refuge to oil and gas leasing. The leasing project will have lasting impacts to both the wild coastal plain and the abutting Mollie Beattie Wilderness. The Arctic Refuge—known as the “Serengeti of the Arctic”—is our wildest, most ecologically intact landscape in the United States, and it is the largest system of public lands and waters set aside for wildlife conservation in the world. This iconic area had been federally protected from oil and gas development until 2017 when the Trump administration pushed through a rider to tax reform legislation, opening up the Refuge to exploitation. So we sued. We also filed for a preliminary injunction to stop the issuance of leases and the authorization of seismic surveys. Unfortunately, the judge denied the injunction request, noting that no ground-disturbing activities had been authorized yet. The good news is the Biden administration is now hitting a pause button and reviewing the whole program. And, the judge left the door open for us to revive our injunction request should Interior authorize ground disturbing activities, and we feel well-positioned to get an injunction and ultimately prevail in the case.

Grazing in Arizona and New Mexico

On January 14, 2021, we sued to stop the Forest Service’s authorization of commercial livestock grazing on more than a quarter million acres of National Forest lands in Arizona and New Mexico, including tens of thousands of acres of the Gila and Blue Range Wildernesses, two Wilderness Study Areas, and the Blue Range Primitive Area. The area has a long history of significant ecological damage from grazing, chronic violations of grazing permit terms, impacts from trespass cows, and predator killing to protect livestock—including the “removal” of ESA-listed Mexican wolves. What’s more, cows come with development, and the Forest Service has authorized three water storage tanks, three troughs, a solar panel to operate a pump, 1.6 miles of fencing, and 2.9 miles of pipeline in the primitive area, which is managed as Wilderness. The suit is in the early stages. We’ll keep you posted as it progresses.

Bear Baiting in Idaho and Wyoming

Our 2019 lawsuit to stop the killing of grizzly bears over bait piles in Idaho and Wyoming has survived two motions to dismiss and is ongoing.

Over the last couple of years, grizzlies have been making their way across highways and interstates and over divides to their ancestral homeland in the Selway-Bitterroot ecosystem along the Idaho and Montana border. The area provides some of the best grizzly habitat left in the Lower 48, and the bears will return if we let them. Unfortunately, their path is littered with black bear bait piles, and several dispersing grizzlies have been shot and killed over the garbage heaps—including the first known grizzly to inhabit the Selway-Bitterroot in more than 50 years. In the last two years, other grizzlies have been spotted in the area—an incredibly exciting development—but we knew they were there because they were photographed at bait piles. Our lawsuit aims to eliminate this deadly, but easily preventable, obstacle and help grizzlies return to their wild homelands.
As I write this, I'm smiling because I can see my desk again after two months of year-end fundraising. Thanks to all of you who were able to make a donation. And thank you to everyone who wasn't able to contribute financially, but responded to our action alerts throughout 2020. We are humbled by your tremendous support.

We also want to take this time to acknowledge one of our members, Bob Weggell, who provided a generous match incentive for all first-time donors during our year-end fundraising efforts. Bob is a retired magnet design engineer at the National Magnet Laboratory at Massachusetts Institute of Technology, and was cited in *The Guinness Book of World Records* for co-designing a magnet that generated the “most intense continuous magnetic field in the world.” He also has a passion for hiking, trail work, conservation, wildlife photography, and it’s safe to say, Wilderness, too. Thank you, Bob!

We took a giant leap last year in the number of monthly donors that contribute to Wilderness Watch. Monthly donors provide us with a stable funding source that we can depend on to meet the vast challenges facing the National Wilderness Preservation System. It also provides donors with the peace of mind of knowing that they don't have to think about renewing their membership. We have approximately 100 monthly donors, and our goal is to double that number in 2021. Signing up to become a monthly donor is simple. You can call me in the office at 406-542-2048, Ext. 1, and we can do it over the phone, or you can complete the transaction through our website—wildernesswatch.org—by clicking the donate button. Make sure to click the box, “Make this a monthly donation.”

I’ve noticed in my short time at Wilderness Watch that more and more of our members are requesting only e-communications. In other words, they don’t want to receive any paper in the mail from us. This is understandable on many levels, and we’re happy to oblige. You can receive our newsletters, membership renewal letters, fundraising appeals, and receipts for donations electronically if you prefer. Email me at breth@wildernesswatch.org or call our office, and I will update your membership preferences.

Please remain vigilant in the defense of Wilderness. While the new administration appears to be more environmentally friendly, that doesn’t, necessarily, translate into better wilderness administration by the federal land agencies. For decades, commitment to our National Wilderness Preservation System has been eroding, both with Democrats and Republicans in the White House. Therefore, please continue to read and respond to our action alerts, write letters to the editor in your local and regional newspapers, and pick up the phone and call your elected officials. Activism only works if you remain active! And keep those donations coming, too!

P.S. Your membership renewal date now appears on the back of the newsletter near your name and address.
Wilderness Watch is urging the Forest Service (FS) to reject a proposal by Montana Department of Fish, Wildlife, and Parks (FWP) to poison 67 miles of the North Fork Blackfoot River and its headwater tributaries and three small lakes in the Scapegoat Wilderness. The plan calls for at least 60 helicopter flights to haul in poisons and other equipment, a motorboat, and generators and other motorized equipment. The Scapegoat is part of the famed Bob Marshall Wilderness Complex in northwest Montana.

The streams, lakes, and upper reaches of the North Fork Blackfoot River scheduled for poisoning are naturally fishless. The State’s goal is to kill the fish they’ve been stocking in these headwater streams for several decades and replace them with westslope cutthroat trout, a species native to the lower reaches of the North Fork, and one they deem to be more attractive to anglers than the fish they’ve stocked in the past. The FS and FWP refer to the project as “restoration,” yet it isn’t restoring any condition that ever existed in the upper North Fork.

Poisoning streams and stocking fish in naturally fishless waters wrecks havoc on the natural aquatic ecosystem. We noted in our comments that the poison rotenone has been shown to kill many of the organisms that derive oxygen from the water, including aquatic vertebrates and invertebrates, amphibians, and other species that naturally occur in these streams. Introducing westslope cutthroat—an effective predator—into naturally fishless ecosystems has been shown to have devastating effects on natural systems throughout the West. Creating more angling opportunities is not a legitimate justification for invading and manipulating the Scapegoat Wilderness with helicopters, motorboats, and poisons, and the FS needs to reject this FWP proposal.