

# Wilderness Watch Critiques Ecological Interventions Proposal

By Kevin Proescholdt

In June, the interagency Aldo Leopold Wilderness Research Institute in Missoula, Montana released a draft “decision support tool” to guide managers contemplating ecological intervention management actions in Wilderness. Though intended to require managers to more adequately justify such interventions, the support tool could ultimately make it easier for such interventions to occur. Wilderness Watch responded with detailed comments in September, opposing such manipulations.

The draft document, “Supplement to Minimum Requirements Analysis/Decision Guide (MRA/MRDG): Evaluating Proposals for Ecological Intervention in Wilderness,” was issued for limited review in June. The draft sets up a checklist for wilderness managers to use to evaluate ecological manipulations of Wilderness, much of which might ostensibly be done to mitigate or overcome the effects of climate change.

Unfortunately, the policy starts from the premise that it is appropriate for managers to engage in such in-

terventions and will most likely be used by managers to ensure that all boxes are checked, rather than to seriously question whether proposed projects are appropriate in Wilderness.

## Wilderness Watch’s concerns include:

- The Wilderness Act generally prohibits interventions in Wilderness. The Wilderness Act calls for restraint and humility in Wilderness and directs us to leave Wilderness unmanipulated and untrammelled. As such, Wilderness should be kept free from human control, and should be allowed to function in its ecological and evolutionary roles without human constraints, manipulations, and interventions, regardless of whether managers may wish to see different conditions on the ground. This is a basic tenet of Wilderness, that Wilderness remains a “self-willed” land.
- Ecological interventions in Wilderness to try to mitigate climate change will degrade wilderness character just like other interventions do. Many proposed ecological intervention proposals seem to be the result of sure-to-increase wide changes to ecological systems as a result of human-caused climate change. Specific interventions in Wilderness to address climate change are unlikely to alter the trajectory of the changing climate, and will only serve to degrade the wilderness character of the areas so manipulated.
- The framework for the so-called five qualities of wilderness character found in Keeping It Wild 2—the agencies’ wilderness character monitoring protocol, which the “decision tool” is based upon—is flawed and improperly diminishes the central importance of wildness in wilderness character. Some underlying assumptions, in particular that preserving wildness is not central to protecting wilderness character, need to be reconsidered before approving a framework to evaluate proposed ecological intervention in Wilderness. Some of these relate to the appropriateness of the five wilderness qualities the agencies have selected, which are used in the decision tree in the Minimum Requirements Decision Guide/Minimum Requirements Analysis (MRDG) process. (See accompanying article.)
- The MRDG process was not designed to analyze ecological intervention in Wilderness. Rather, its purpose was to analyze whether the narrow exceptions to the prohibitions in section 4(c) of the Wilderness Act could be used in administering Wilderness. In other words, the MRDG process applies to proposals to use



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Photos: Kevin Proescholdt/Brett Haverstick

## Ecological Interventions Proposal (continued)

motorized equipment, motorized/mechanized transport, build structures, or other prohibited actions. Even if ecological intervention were appropriate, the MRDG process seems to be a poor tool to make those determinations, as this Supplement itself tacitly admits, “This supplement is needed because ecological intervention proposals commonly entail complex legal, scientific, and ethical questions that may be beyond the realm of a typical MRA or MRDG.”

- The Supplement repeatedly asks wilderness managers to make judgments or answer questions that are well beyond their expertise and in most cases beyond the knowledge of the world’s greatest experts. For example, one question asks “Does the proposal describe how the

ecological intervention will provide long-term adaptation or mitigation to the effects of climate change?” Even the world’s leading ecologists would hesitate to answer this question and wouldn’t likely have much confidence in their answer. Similarly, though most wilderness managers are NOT attorneys, another question asks, “Does the proposal describe if potential legal and administrative conflicts and uncertainties have been resolved?” Few if any wilderness managers have the legal expertise to answer this question. In short, while the questions will make it appear the proposed ecological interventions will be well thought out, the reality is managers can’t provide answers with any level of certainty whatsoever. ☹️

### How Keeping It Wild 2 (KIW2) Framework Improperly Diminishes Wildness

The four federal agencies that administer Wilderness (U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, and Bureau of Land Management) have developed a new framework for monitoring and preserving wilderness character. Among many other problems, the misleadingly named *Keeping it Wild-2 (KIW2)* framework fails to recognize the central importance of wildness to wilderness character, and instead decreases wildness to only a small fraction of what must be preserved.

The framers of the Wilderness Act certainly recognized the central importance of wildness to Wilderness. Howard Zahniser, for example, the author of the Wilderness Act, wrote more than a decade before the Wilderness Act became law, “**We must remember always that the essential quality of the wilderness is its wildness.**”

The KIW2 framework recognizes *wilderness character* is a holistic concept that includes symbolic meanings of humility and restraint, landscapes primarily free of human manipulation and free of signs of modern society. But for the purposes of monitoring and decision making, KIW2 devolves wilderness character into five separate qualities—untrammelled, natural, undeveloped, outstanding opportunities for primitive and unconfined recreation, and other features of interest. The five qualities are defined as equal in importance and often in conflict with each other.

So under KIW2, wildness (untrammelled) is reduced to only 20 percent of wilderness character, rather than the

central importance it should have. Perhaps more problematic, the KIW2 framework sets up all five features to be in conflict with each other. So a wilderness manager could decide to approve a project that damages the untrammelled and undeveloped qualities, but which she believes would improve the recreation quality.

Using this flawed framework, as one example, the Forest Service recently authorized the Idaho Department of Fish and Game to use helicopters to capture and collar 60 elk in the Frank Church–River of No Return Wilderness, part of the state’s ongoing efforts to increase elk populations by severely reducing wolf numbers through predator control and liberal trapping and hunting seasons. The Forest Service determined the impacts to wildness (untrammelled) from intervening in the natural predator-prey relationships, and the impacts to the undeveloped quality (using helicopters and installing radio collars on the elk) were offset by potentially increasing elk numbers, which would benefit the “natural” quality of the wilderness.

It is these kinds of rationalizations or balancing acts the KIW2 protocol fosters, but which will surely diminish wildness and degrade the wilderness character of the areas in the National Wilderness Preservation System.

For a full critique of the KIW2 protocol, download the report, “The Definition of Wilderness Character in ‘Keeping It Wild’ Jeopardizes the Wildness of Wilderness” by David Cole, Doug Scott, Ed Zahniser, Roger Kaye, George Nickas, and Kevin Proescholdt, from our website: [www.wildernesswatch.org](http://www.wildernesswatch.org). ☹️