

## Wilderness Wetland or Fishbowl Folly? This Summer's Saga at Red Rock Lakes

By Andrew Hursh

The image at the center of this page shows the large fen at the head of Upper Red Rock Lake in the Red Rock Lakes Wilderness. This Wilderness area in Montana's remote Centennial Valley is pretty special. It's not huge—at a little over 32,000 acres, it's a junior neighbor compared to other tracts of well-known backcountry like the nearby Absaroka-Beartooth, Teton, or River of No Return Wildernesses. And it's ringed by roads; the Wilderness encompasses a large expanse of lakes and wetlands in the upper valley bottom, and around it sit ranchlands and the developments of the Red Rock Lakes National Wildlife Refuge. Across the road, a portion of the Wilderness rises to the dramatic crest of the Centennial Mountains.

But it's exactly these circumstances—Red Rock Lakes' isolated, valley-bottom ecosystem—that make it so special. Here, wilderness protection isn't extended only to craggy and difficult-to-access mountainsides, or to dark and desolate canyons. Instead, we've recognized the immense value in saving one of the largest wetland complexes in the Greater Yellowstone Ecosystem, despite it being situated

among the Centennial Valley's wide grasslands, where the demands of livestock grazing and other pressures would incur from all sides. Red Rock Lakes was one of the last habitats that trumpeter swans relied upon when the species was nearing extinction early in the twentieth century. In recognizing the natural value of this place and in so protecting it, we have created an opportunity to honor the importance

of wilderness stewardship both upstream and downstream of the human presence on the landscape.

Unfortunately, however, the vagaries of federal lands management have not always led to success in stewarding the wild earth that our human existence straddles. In and around the Red Rock Lakes National Wildlife Refuge, people got busy mucking around with nature's wetland wonders. Towards the foot of the valley, the Lima Dam

went up in 1909 and severed the hydrologic connectivity. No longer would the waters' inhabitants travel freely downstream from the Red Rock River and its tributary creeks, one of which represents the farthest reaches in the Missouri River basin and thus the fourth longest watercourse in the



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### *In This Issue:*

# President's Message

## Working Together for the Singing Wilderness

*"The singing wilderness has to do with the calling of loons, northern lights, and the great silences of a land laying northwest of Lake Superior."*



A reading from Sigurd Olson's 1956 best-selling book about the Boundary Waters Canoe Area Wilderness, *The Singing Wilderness*, began the October 2023 Board of Director's meeting of Wilderness Watch near Yellowstone National Park. The Board meets with the staff biannually in the spring and fall to manage the organization's affairs, and to strategically chart a path forward.

As with all Boards, finances are a critical responsibility. I'm happy to report to our 3,000-plus members that

the organization is in good financial health and is on track to end the year under budget. Importantly, we have divested our investments from fossil fuels as well as companies responsible for deforestation or harm to people and animals. This has ensured that our investments don't compromise our values.

Besides reviewing and strategizing Wilderness legislation and new brushfires as you'll read about in this issue, the Board is working closely with staff in developing specific campaigns that will guide our policy work in the coming years. We are continuing our work on the campaign to end livestock grazing in Wilderness, and we have started groundwork on our Future of Wilderness campaign. Other developing initiatives include addressing climate change interventions (countering the narrative that climate change and ecological crises necessitate human intervention in Wilderness), recreation in increasingly stressed landscapes, and working to revive and advance agency wilderness programs.

One Board session focused on how Wilderness Watch will celebrate the Wilderness Act's 60th anniversary next year. As is often the case, there are more opportunities than we have the time and resources to commit. With increasing threats to Wilderness coming from every direction, we will look at ways to bolster our campaigns and emphasize the case for why Wilderness and the Wilderness Act are more critical than ever. Stay tuned.

Critical and underlying all our work to preserve Wilderness are our communications and outreach activities. Since our last board meeting in May, staff have issued 22 action alerts and issue-related announcements to 45,000 active supporters. Forty-one percent of our alerts are opened—almost twice the average open rates for nonprofit organizations. We also know that supporters clicking on action alert links to submit comments ranged from a very helpful 1,800 for Point Reyes Tule Elk to 6,000 for High Uintas Wilderness grazing, to 8,200 for Buffalo Creek fish poisoning to an amazing 10,200 on the proposed road through the Izembek Wilderness in Alaska!

Please know this: The Wilderness Watch Board, staff, and members and supporters like you form a passionate, dedicated, and seamless team defending the National Wilderness Preservation System. We appreciate your help in responding to our alerts, contacting decisionmakers, writing letters to the editor, supporting Wilderness Watch financially, and helping to spread the word. You make our successes possible. Thank you on behalf of our "singing Wilderness" everywhere. 🌿

—Mark Peterson

*Mark Peterson is a former director for the National Parks Conservation Association, the Sigurd Olson Environmental Institute, and the National Audubon Society.*



The **Wilderness Watcher** is the quarterly newsletter of Wilderness Watch, America's leading conservation organization dedicated solely to protecting the lands and waters in the National Wilderness Preservation System.

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## Red Rock Lakes (continued from page 1)

world. People built additional, smaller dams upstream in the refuge, and they rerouted and straightened creeks to manufacture more waterfowl hunting grounds. State and federal officials stocked non-native brook, rainbow, and cutthroat trout for sportfishing opportunities.

Yet the ecological integrity of Red Rock Lakes generally sustained, and in later years the Fish and Wildlife Service (FWS) has taken some good steps to remove past harms. When Congress granted most of the refuge Wilderness status in 1976, the bill's drafters emphasized: "It is crucial that the undeveloped and undisturbed marshlands of the Refuge be protected from man-made intrusions."

One victim of human misadventures in this area has been the arctic grayling. As its name implies, this fish in the salmon family thrives in greatest abundance in the waters of the north. In Montana's Missouri River headwaters, an isolated population of grayling occupies the southernmost native habitat for this species. Yet human pressures have pushed these grayling to the brink in their native ecosystems. In the twentieth century, fisheries managers harvested millions of grayling eggs to spread around the West in sportfishing stocking efforts. And the impacts of agriculture, livestock, fishing pressure, human development, habitat destruction, dams, and climate change have all wreaked havoc on what was once robust arctic grayling abundance. Conservation groups have petitioned the Fish and Wildlife Service (FWS) to grant Endangered Species Act protections to grayling populations in the Big Hole and the other few rivers where they remain in Montana. But FWS has rejected these petitions. Conservation groups have now sued over the agency's recalcitrance.

Such recalcitrance from federal officials comes, as it often does, from a failure to put nature over the whims and demands of people, despite laws like the Endangered Species Act and the Wilderness Act that are supposed to make us do so. In efforts to avoid endangered species listing, officials end up reframing the problem entirely. Rather than deploying our legal tools as designed to restrict human activities that harm natural habitat, they refocus efforts on staving off the detrimental effects of regulation—to protect people and the habitat-damaging activity they so enjoy. Thus, political pressures on the folks at agencies like FWS and Montana Fish Wildlife & Parks lead them to clamber for whatever actions don't involve more severe restrictions on sportfishing, development, irrigation, livestock, and so forth.

Such a "bass-ackwards" approach, as a federal judge would call it, was on full display this summer in the Red Rock Lakes Wilderness. In response to sharply declining numbers of arctic

grayling in Upper Red Rock Lake, FWS (at the prodding of the state agency) proposed to essentially reengineer the habitat into a better grayling aquarium. Following an over-reliance on abstracted mathematical modeling, they targeted winter as the primary cause of grayling decline. FWS proposed to artificially boost oxygen levels in the lake to make the effects of winter milder, despite the fish having sustained for millennia in this area through what were surely much harsher winters than today, and thus supposedly assist the fish. They'd accomplish this through permanent infrastructural improvements, installing a pipeline out into the lake to divert water from a man-made pond.

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The bottom line is that when nature starts to reflect injury at human hands, the best approach is to keep hands-off, to remove our harms and get out of the wild's way.

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Wilderness Watch and other conservation groups commented extensively on the problems with this approach. We noted, for example, that the agency was ignoring the potential harms of their recently liberalized spring fishing opportunities in the creek where the grayling spawn. We noted that issues like a lack of habitat connectivity require solutions that restore the connectivity—not solutions that leave past human harms in place and just double down with new engineering efforts in protected Wilderness. We noted that

it made no sense for FWS to refuse Endangered Species Act relief for grayling while at the same time arguing that it was essential to contradict the Wilderness Act with infrastructural habitat manipulations—adding insult to injury by disrespecting both important environmental laws.

This June, after FWS formally approved the pipeline project despite our protests, we took them to court—and won. The aforementioned judge in Montana's federal district court recognized the illogic in the government's approach and awarded us a preliminary injunction halting the construction planned for this year. And rather than fight the case further, FWS then rescinded their project approval decision.

We're pleased to have saved the wildness in this special place from misguided human meddling, for now. And we'll continue to monitor the situation at Red Rock Lakes and fight environmental manhandling throughout the Wilderness system. The bottom line is that when nature starts to reflect injury at human hands, the best approach is to keep hands-off, to remove our harms and get out of the wild's way. We must fix ourselves, not try to fix nature so that it won't reflect our damage as clearly. That's what the Wilderness ethic is all about—reining in our hubris, keeping our backhoes and our pipes and our other junk out, and respecting and protecting wild ecosystems on their own terms. 🐾

*Andrew Hursh is Wilderness Watch's staff attorney.*



# Wilderness in the Courts

In addition to the work at Red Rock Lakes described in this issue's cover story, Wilderness Watch's packed litigation docket has kept us busy in the courts. Two newly launched cases warrant mention now.

First, back in June, we sued the Payette National Forest over their mismanagement of backcountry aircraft activity in the River of No Return in Idaho, the largest contiguous Wilderness area in the lower 48. The Wilderness already contains over two dozen airstrips—eight grandfathered in and managed by the Forest Service (FS) for public access, and the rest on private or state inholdings. Yet hobby pilots have popularized playing around with their noisy machines at four additional locations in the Big Creek watershed, repeatedly bagging landings and choking the Wilderness airspace in a purely motorsport pursuit. The Forest Service has kowtowed to the pilots and to Idaho Fish and Game (which wants more airstrips to facilitate wolf hunting), and the agency recently expressly permitted landing at these unlawful locations and began helping to maintain them. We've filed a lawsuit to reverse the Forest Service's unlawful and wilderness-damaging moves, and we'll keep you posted as the case develops.

Second, we sued the National Park Service (NPS) this September over their extensive plans for environmental manipulations in Sequoia and Kings Canyon National Parks' designated Wilderness in

California. There, wildfires have recently resulted in notable levels of giant sequoia mortality. Impacts to giant sequoia groves can certainly spark an emotional response, but NPS managers have overreacted in their zeal to reshape the Wilderness environment. They've planned to ignite fires over tens of thousands of acres and to extensively cut down trees around sequoia groves to force more "desired" conditions for

future wildfires. All the activity would be heavily assisted by helicopters and chainsaws and other motorized equipment. And the agency approved the large-scale, multi-year project without involving the public, improperly characterizing it as an "emergency" to skip over their National Environmental Policy Act obligations. We sued because we recognize the danger in allowing the federal land agencies to abuse so-called "emergency" situations to cut the public out of impactful and hasty Wilderness-damaging decisions. We also recognize the danger in allowing NPS to open the door to chainsaw cutting in Wilderness in the name of

"fuels reduction"—a slippery term that has covered extensive timber projects on the National Forests. NPS is also gearing up to intensively plant sequoia seedlings in burned areas despite their already abundant natural regeneration. We're currently working on redressing these additional proposals to impose human engineering on the wild as well. 🌲



The National Park Service plans to cut most of the trees surrounding these giant sequoias in the Lost Grove within the SEKI Wilderness. Photo by René Voss.



# Thank you, Cyndi

It's never fun to send off our dear friends and board members, but term limits had us doing just that for Cyndi Tuell, who is leaving the Wilderness Watch board. The term limit policy gives the organization a chance to recruit new board members and gives dedicated board members, like Cyndi, a break. A native of Tucson, she has been a steadfast wilderness, wildlife, and environmental justice advocate for years, working for conservation organizations and using her skills as an attorney to protect public lands. As the Arizona/New Mexico Director for Western Watersheds Project, she has been at the forefront in efforts to keep cattle out of sensitive public lands. She always informed Wilderness Watch about grazing issues that affect Wilderness in the Southwest.



Cyndi served as Secretary for the Wilderness Watch board and took the lead in developing a sabbatical policy for the staff, which was recently implemented. Her critical thinking, perspective as a resident of the Southwest, and enthusiasm helped Wilderness Watch grow and aided Wilderness in the Southwest and throughout the country. We wish you the best, Cyndi, and are grateful for your dedication, friendship, and years of service to Wilderness Watch and Wilderness! 🌵

## Welcome WW Board Members



**W**ilderness Watch welcomes Minnesota attorney Jon Dettmann back to our board of directors. Jon first joined the WW board in 2003, where he served for eight years, including in the role of president of the board. Jon represented Wilderness Watch in our epic successful

legal challenge to stop the National Park Service from conducting motorized van tours through the Cumberland Island Wilderness in Georgia. He argued our case through federal district court up to the 11th Circuit Court of Appeals and won a sweeping decision there in 2004 in favor of Wilderness. Jon enjoys visiting Wilderness, including winter camping in the Boundary Waters Canoe Area Wilderness.



**W**e also welcomed Mike Browning to our board. Mike grew up in Great Falls, Montana. After graduating from Yale Law School, he had a 40-year career in Colorado as a water lawyer. Mike spent most of his summers in high school and college backpacking in Glacier National Park

and the Bob Marshall Wilderness, where he fell in love with mountains and wild places. He has climbed Mt. Everest and finished the rest of the Seven Summits, climbing another 500 or so peaks along the way. Mike has served six years (two as chair) on the board of the Eagle Summit Wilderness Alliance, a volunteer organization working to protect the four Wilderness areas in Eagle and Summit counties, Colorado. He is passionate about the intrinsic values of Wilderness. 🏔️

# Thinking Ahead to the Exponential Age:

## Artificial Intelligence image generation and the Arctic Refuge Wilderness

By Roger Kaye

It's become an ever-more recognized truism: Technological change, and especially that guided by artificial intelligence (AI), is far outstripping our capacity to understand its effects on our values, ethics, and who we are becoming. Futurists warn that the technological imperative, our tendency to adopt such technology without adequately considering its potential (and unintended) effects, is becoming increasingly consequential. We need to consider both the promise and peril of this exponentially accelerating digital, algorithmic self-learning technology and not adopt it unthinkingly.

The Arctic Refuge is anticipating the time, not that distant, when DALL·E-type computer image generating programs will become available for Fish and Wildlife Service (FWS) outreach, information, and educational uses.

Refuge staff have been proactively thinking about how we might respond: 1) adopt or welcome the technology because it's here, it's useful, fun and intriguing, and because others are using it; 2) adopt the technology, but place sideboards or limits on its use, or 3) adopt a policy of not using the technology to represent the Refuge or Wilderness. We have now decided to just say no to the use of AI-generated art and manipulated or faked photos for purposes of outreach, information, and education. The use of virtual reality to embellish or distort perception of the Arctic Refuge would conflict with its authentic, unmanipulated, natural, and wild character. We don't think faked images should represent Wilderness, whose essential quality is detachment from artifice and where one's experience, to the greatest extent possible, should be unmediated by technology and human pretense.

Yes, others may do as they wish; this isn't censorship. But if an Arctic Refuge image is from the FWS, viewers will know

that it is a genuine, human-created representation of the area, not a computer-generated virtual reality portrayal.

That said, we realize that there will be gray areas, ambiguities, and questions of why this but not that. AI is becoming more and more connected to or embedded in what we do, and it's now part of many cameras. Often there will not be

altogether clear, black-and-white boundaries. Nevertheless, we feel reasonable lines can be drawn where the intent is to deceive or mislead the viewer, either through misrepresentation of the subject or the degree of human agency behind the portrayal.

Our policy does not apply to scientific use of AI, which is already occurring on the Refuge.

### Arctic Refuge's Policy Statement:

*Anticipating the time, not that distant, when computer visual image-generating programs become available to the Fish and Wildlife Service (the Service), the Arctic Refuge has decided that for the foreseeable future, it will not use artificial intelligence-created, edited, or manipulated artwork or photos. Viewers will know that images presented by the Refuge are authentic, human-created representations of the area.*



This looks like some place in the Arctic Refuge, but it exists only in virtual reality. This "photo" was made up by the Dall·E image generating program, courtesy of Paul Leonard.

DALL·E can not only change, edit, add to, or make up landscapes, it can embed, delete, embellish, or exaggerate features. Image generating algorithms will enable users to "order up" combinations and patterns of colors, tones, shadows, contrasts, depth, and other elements to induce the mood and emotional effect upon viewers that the creator desires. Arctic Refuge is looking beyond where AI image generating programs are now (in relative infancy) to where they are going.

Arctic Refuge's decision is a step toward adopting an approach of thinking critically, objectively, and futuristically about AI and such Exponential-Age transformative technologies, and considering how they may enhance or cause loss of what we value—on the landscape and within ourselves. 🌿

*Roger Kaye is a Wilderness and Anthropocene coordinator for the Alaska USFWS and is the author of "Last great Wilderness: The Campaign to Establish the Arctic Refuge."*



In another essay, “Look, where are we going?”, Roger Kaye urges us to consider possible futures, likely very different from now, for our planet and humanity itself, as exponentially-advancing AI collides with accelerating environmental crises and challenges. Here’s an excerpt from that essay:

“In all this complexity of things,” wrote Mardy Murie, matriarch of American conservation, “where is the voice to say: ‘Look, where are we going?’” At the time, Mardy and her husband Olaus were leading the wilderness movement and the contentious effort to establish the Arctic Wildlife Refuge, which Olaus said symbolized the emerging question “of what is the human species to do with this earth?” Their thinking was in the context of the future of the Earth, the globe, the planet, and humanity.

They worried about “human arrogance,” “idolatry of the machine,” and “our plundered planet.” “Perhaps man is going to be overwhelmed by his own cleverness” Mardy presciently wrote, “Somewhere along the line we have lost control over the beings we have created.” This was during the 1950s post-WWII march of progress, an era of then unprecedented environmental degradation and technological change. Mardy and Olaus were among the earliest to realize that future generations might not inherit the same Earth. But even these visionaries couldn’t have imagined the terra incognita our accelerating environmental degradations and our exponentially advancing technologies are leading us to.

We are creating an anomalous, non-analogue future with possibilities and perils that now depend on not only what we will do with this Earth but also on how our technology will shape our evolution as a species.

**Read the rest on our website:**  
<https://rb.gy/cze77>

## Great Bear Campout

This summer Wilderness Watch organized a gathering of grizzly bear advocates at the Wilderness Gateway Campground in Idaho to discuss the potential delisting of grizzlies from the Endangered Species Act and actions we can collectively take to protect the Great Bear. The Department of Interior is currently analyzing a petition from the state of Montana that would strip the bears of federal protection, leading to more dead grizzlies via trophy hunting and other killing that is currently prohibited. Nearly 60 activists representing over 15 conservation groups attended. 🐾



## Wilderness in Congress

### Connect Our Parks Act (S. 2018)

This bill, introduced by Sen. Barasso (R-WY), with several Democrat co-sponsors, contains requirements to increase broadband internet service and cellular phone service (and associated tower construction) in National Parks, regardless of the current state of such services. This bill could have many negative impacts on Wilderness, Recommended Wilderness, and backcountry in the parks, with its requirements to build towers and the intrusion of increased internet and cell phone service in these wild places. Wilderness Watch has partnered with PEER to raise concerns about this bill, which we’ve shared with the senate sponsors. The Senate Energy and Natural Resources Committee has unfortunately already passed this bill, though there is not yet a House companion bill.

View a complete listing of wilderness bills in Congress on our website: [wildernesswatch.org](http://wildernesswatch.org). 🐾

# On the Watch

## Preserve Isle Royale's Wilderness

The National Park Service (NPS) has drafted a Wilderness Stewardship Plan for Isle Royale Wilderness and National Park in Michigan that will determine the future of historic structures in both potential and designated Wilderness. Nearly all of the land within the park is Wilderness, with an additional 93 acres of Potential Wilderness Additions (PWAs) that the Park Service can convert to designated Wilderness once non-conforming uses (including structures) have ended. Another 1,677 acres of the island are non-wilderness.

The future of historic buildings and structures on Isle Royale has been a controversial issue for years—even though all of Isle Royale has been publicly owned since it became a National Park in 1940—with some families retaining life estates or other continued access to the historic cabins they sold to the federal government those decades ago.

Wilderness Watch is advocating for the Wilderness to be protected by improving the draft plan, which currently proposes “molder” or “removal” for only about 25 of the 100 structures in Wilderness or PWAs and permits maintenance or restoration for many others. The structures in Wilderness should neither be maintained nor stabilized. Those the Park Service wishes to maintain should be relocated to areas outside of Wilderness where they may be better curated, preserved, and made accessible to the general public. We are also urging the agency not to reclassify any of the PWAs as designated Wilderness if it plans to maintain any structures unnecessary for the administration of the Wilderness; to eliminate commercial uses from the Wilderness; to manage visitor use in Wilderness so that solitude and wild character are protected; and

to keep the park closed in winter to allow wildlife a respite from the relatively heavy human presence the rest of the year. 🌿

## Let Yellowstone buffalo roam

Wilderness Watch is advocating for a better Bison Management Plan for Yellowstone National Park in Wyoming and Montana. The current plan severely limits bison migration and keeps the population at an artificially low number by allowing bison to be slaughtered, captured, and relocated.

We're asking the Park Service to greatly strengthen the one Alternative it's presented that moves bison management in the right direction—Alternative 3.

Our recommendations include expanding the landscape that bison are allowed to inhabit outside of Yellowstone, ending the NPS's capture-for-slaughter program, eliminating the Beattie Gulch firing line where bison are

slaughtered just outside park boundaries, requiring that any hunting outside the park on federal public lands be managed by the federal agencies rather than the anti-bison states, and removing artificial bison population limits.

We're pushing the NPS to stop treating our last wild, migratory buffalo as livestock rather than wildlife, and to instead ensure that bison are free to migrate as they need—both within and outside of Wilderness areas around Yellowstone—and that their numbers are allowed to fluctuate naturally, without an artificial population cap. The available habitat in and surrounding Yellowstone, predation, and natural selection should determine bison numbers. 🌿





# On the Watch

## Protect the Arctic Refuge from drilling

In September, we celebrated the news that Interior Secretary Haaland had canceled the last Trump-era oil and gas leases on the coastal plain of the Arctic National Wildlife Refuge. With the cancellation of those leases, the Bureau of Land Management (BLM) also issued a Draft Supplemental Environmental Impact Statement (SEIS), as required by the so-called Tax Cuts and Jobs Act of 2017.

Wilderness Watch strongly opposes all oil and gas activities in the Arctic Refuge. We recognize that a leasing program is required by the 2017 tax cut law, but more has to be done to protect the Arctic Refuge from oil and gas development. Lasting protection will only come by designating the entire Refuge as Wilderness.

Fossil fuel development would destroy the wild quality of both the coastal plain and adjacent Wilderness lands in the Arctic Refuge, and the Draft SEIS fails to truthfully explain what would be lost.

Absent repeal of the provision in that law that opens the refuge to leasing, Wilderness Watch is advocating for stronger protections for onshore denning habitat for polar bears and for the Porcupine caribou herd. BLM also must consider the impact of climate change on migration routes and habitat, and the potential for oil and gas activities to further magnify these effects. 🌿

## Remove a dam in the Rattlesnake Wilderness the right way

As the City of Missoula considers how it will remove a dam it owns in the Rattlesnake Wilderness in Montana, Wilderness Watch is urging it be removed in a way that respects the integrity of the Wilderness. The 15-foot-high dam on McKinley Lake is in poor condition, and the water is no longer used for its original purposes of irrigation and municipal use, so Missoula is proposing to breach the dam and return the area to its natural condition.

Removing the dam is a great idea, but it's important how the work gets done. The city's proposal calls for using a helicopter, motorized equipment, and motor vehicles, even though the work can and should be done the "wilderness way."

Wilderness Watch is urging the city to access the dam on foot or horseback, pack in supplies, and use traditional, non-motorized tools to breach the dam. And we're urging the Forest Service to both encourage the city to complete the work in a non-motorized way and to provide assistance. Motorized use isn't "necessary" and shouldn't be allowed.

The city owns dams on seven other small lakes in the Rattlesnake Wilderness. The McKinley Lake project is a pilot project for breaching these other dams, making it even more important to do this the right way in Wilderness. 🌿

## Keep cattle out of Arrastra Mountain Wilderness

Wilderness Watch is urging the Bureau of Land Management (BLM) to protect the Arrastra Mountain Wilderness in Arizona by keeping cattle out of this fragile desert. The BLM has proposed allowing cattle grazing in the 31,792-acre Palmerita Ranch Allotment, which includes 4,200 acres within the Wilderness.

Both the Wilderness and the surrounding area are unsuitable for grazing, consisting mainly of Mojave and Sonoran desert plants plus a unique ephemeral riparian zone. Threatened, endangered, and rare species include the yellow-billed cuckoo, southwestern willow flycatcher, northern Mexican garter snake, and the Sonoran Desert tortoise. The area also provides important habitat for mountain lions, desert bighorn sheep, javelina, and numerous other birds, amphibians, reptiles, and bats.

The allotment has not been grazed by cattle since 1996. Re-opening the area to cattle grazing would create substantial impacts to the Arrastra Mountain Wilderness, its watersheds, and wildlife, as well as halt or reverse the ongoing recovery of native perennial grasses which support wildlife in the Wilderness. 🌿



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## On the Watch (continued from page 9)

### Take down the fence to let elk roam at Point Reyes

Thanks in part to public outcry by Wilderness Watch and our members and supporters, the National Park Service (NPS) is proposing a new direction at Point Reyes National Seashore in California, with a plan to allow native tule elk to naturally roam the Philip Burton Wilderness as they did for centuries. The smallest and rarest subspecies in North America, tule elk are endemic to, but nearly extinct, across the state.

Tule elk have been rapidly and needlessly dying at Point Reyes, including within the Wilderness, due to NPS mismanagement—the NPS has elk trapped behind an 8-foot-tall fence (that sits just outside the Wilderness), where they have been dying due to lack of water and forage. This is so that some 6,000 cattle can continue to graze there without competition for forage and water, despite the government having paid fair market value to acquire private ranches and end livestock grazing there decades ago. Livestock grazing continues on some 28,000 acres of public land at Point Reyes despite the original agreement to end this commercial use.

Wilderness Watch supports the NPS plan to remove the fence and free the elk. We are also urging the agency to remove water structures without the use of motor vehicles, to honor the seashore's original agreement and end cattle grazing, to not use herbicides in the Wilderness, and to allow natural fires to burn and shape the wilderness landscape rather than create artificial conditions through manager-ignited fire. 🌿



### Remove livestock from High Uintas Wilderness

Wilderness Watch is opposing a plan to continue domestic sheep grazing in the High Uintas Wilderness in Utah, which has the state's highest peaks, hundreds of lakes, and many species of native wildlife.

Despite it being critical bighorn sheep habitat, the High Uintas has more livestock grazing than any other Wilderness in the country. Wilderness Watch is pushing back against a Forest Service (FS) proposal to allow more than 10,000 domestic sheep and their lambs to graze about 144,000 acres across 10 allotments in the Wilderness, including

one that has not been grazed in 40-plus years.

It's likely the High Uintas Wilderness could lose its bighorn sheep population if domestic sheep grazing continues since domestic sheep transmit fatal diseases to bighorns. Not only that, but domestic grazing damages the area's wild character in many other ways, including the trapping and killing of bears, coyotes, and mountain lions; the displacement of other native wildlife; the destruction and loss of vegetation needed by bighorns, elk, moose, and deer; extensive damage to streams and wetlands, and preventing visitors from having an authentic wilderness experience.

Due to these unacceptable impacts to the Wilderness and its wildlife, Wilderness Watch is urging the Forest Service to close these allotments and end domestic sheep grazing in the High Uintas Wilderness. 🌿

## Did you know?

2024 is the 60th anniversary of the Wilderness Act!

Stay tuned for information on how you can join us in celebrating this milestone.



# In Memoriam—Jim Eaton

By Tom Suk

Wilderness has lost a friend and hero with the passing of Jim Eaton. Jim was co-founder and executive director of the California Wilderness Coalition (CWC) from 1976 until his retirement in 1997. He was a key force in developing and passing landmark legislation (e.g., California Wilderness Act of 1984, California Desert Protection Act of 1994) and many other smaller wilderness bills.

In addition to his unequalled contribution to wilderness designations in California, Jim well understood that protecting wilderness does not end with the passage of designating legislation. Long before the formation of Wilderness Watch, Jim monitored agency actions affecting Wildernesses throughout California and acted forcefully to protect them from unlawful trammeling.

For example, the CWC under Jim's direction filed successful administrative appeals overturning multiple decisions to "grandfather" excessive livestock grazing levels in early wilderness management plans. He also filed an administrative appeal that briefly ended the maintenance and operation of unlawful dams in the Emigrant Wilderness. (The CWC's short-lived Emigrant dams victory was overturned by polit-

ical meddling, but decades later Wilderness Watch took up the case and secured a court order in 2006 to end for all time the operation and maintenance of the unlawful dams.)

Jim stood up for Wilderness even under intense pressure from special interests. In the 1980s, he brushed aside extreme backlash from supporters of fish stocking in Wilderness, holding firm to the idea that propagating nonnative species in Wilderness is plainly improper—despite the passionate desires of state fisheries officials and some anglers to "enhance fishing opportunities." While then-supporters of fish stocking in Wilderness bristled and brayed at the mere notion of being questioned, Jim believed that fish stocking in Wilderness eventually would be deemed anathema to Wilderness. History has proved him right.



Jim with his wife, Wendy Cohen (far right), in the CWC office circa 1970s. Photo courtesy of CalWild.

Rest in peace, Jim. We will carry the torch. 🕯️

*Tom Suk is a retired wilderness ranger and researcher. He worked as a part-time volunteer at the California Wilderness Coalition from 1982–1997, and has been a supporter of Wilderness Watch since its founding in 1989.*

## Order your Wilderness Watch gear!

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*Keeping Wilderness Wild*

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## Your support makes our work possible!

By Brett Haverstick

**Y**ou may have noticed an uptick in the number of legal challenges we have brought forward in order to defend Wilderness and its wildlife. Whether it's our recent court victory to protect wilderness character in the Red Rock Lakes Wilderness, our ongoing litigation in the Boundary Waters Canoe Area Wilderness and River of No Return Wilderness, or our lawsuits challenging the harassment and killing of grizzly bears in Idaho and Wyoming, we're holding the line. It's what we do.



A lot of time and energy is invested before a lawsuit is filed. Our staff first analyze the agency's proposal and assess if and how the proposed action will affect the Wilderness area. We may reach out to key activists and allied groups who are also knowledgeable about the issue. Many times, we'll issue an action alert to raise awareness and collectively pressure the agency decision-maker to do the right thing for Wilderness.

Oftentimes, there is a formal administrative process where we submit our position through public comments. At the conclusion of the comment period, the agency analyzes all of the public's comments and completes its environmental analyses. In some cases, if our concerns were not adequately addressed through the initial round of public involvement, we can file an objection. When all administrative objections have been heard, the agency issues a final decision. This is the last step in the administrative process.

If we think that a decision is unlawful, we may file a lawsuit. Litigation is expensive and time-consuming, and we'd much rather see our concerns resolved beforehand. But, when decision-makers ignore public input and the law, we're not afraid to challenge this head-in-the-sand approach.

Please be as generous as you can when you receive our winter fundraising letter in the mail. This is when we rely on YOU to propel us forward into the new year so that we're ready to meet the challenges and seize the opportunities to protect Wilderness and its wildlife. Becoming a monthly donor is also an excellent way to sustain our work in the trenches. Our secure bank-to-bank monthly donor program is simple, and 100 percent of your donation goes towards Wilderness, instead of a credit card company taking its cut.

Feel free to call me in the office at 406-542-2048, Ext 1. if you have any questions. 🍷