



# WILDERNESS WATCHER

A Voice for Wilderness Since 1989

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## Compromising Wilderness

### Wilderness Watch policy paper addresses the compounding costs of Wilderness dealmaking

This April, Wilderness Watch released a policy paper entitled *Keeping the Wild in Wilderness: Minimizing Non-Conforming Uses in the National Wilderness Preservation System*. The paper, which is excerpted below, was drafted with a sense of urgency and concern that the lands in our National Wilderness Preservation System (NWPS) are steadily degrading despite the best intentions of the Wilderness Act. The Act, passed in 1964, was a uniquely American idea and a tribute to the vision of several generations of Americans who saw the value in setting aside from human domination some valuable remnants of primitive North America. The Act established the National Wilderness Preservation System "for the permanent good of the whole people" to be protected and managed so as to preserve its wilderness character.

One of the greatest emerging challenges to protecting the wild character is the preponderance of *special provisions* or *non-conforming uses* included in new Wilderness bills. These provisions not only allow activities within Wilderness that are inappropriate and degrade individual areas, but more importantly the cumulative impact of these provisions threatens to



Mount Rainier Wilderness, WA. WW file photo.

diminish the core values that distinguish Wilderness from other public lands. It is our hope that the paper will serve as a useful tool for protecting Wilderness in future designations and better acquaint citizen activists involved in stewardship decisions with the unique challenges of protecting Wilderness.

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And Much More!

### How Non-Conforming Uses Are Degrading Wilderness

The unique values that characterize lands within the NWPS are being steadily degraded. The culprits can be broadly categorized as increasing motorized uses, commercialization, manipulation of natural processes, and recreational pressures. The underlying causes of these challenges include lack of commitment to wilderness protection at the highest levels within the land management agencies, lack of oversight or commitment to wilderness stewardship from Congress, and limited public awareness of the risks threatening the integrity of the NWPS. These problems are exacerbated by special exceptions written into wilderness bills. Indeed, special

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# insights

## From the Executive Director

*"United we Bargain; Divided we Beg"*  
*—Bumper sticker outside the Union Hall, Missoula, MT*

I cut my teeth in the public lands environmental movement in Utah in the late 1970's and 80's, the days of Ronald Reagan and James Watt—the archetypical robber barons. We were engaged in a mighty struggle: more than 95 percent of BLM lands, including nearly every wilderness study area, was leased to oil and gas companies; the Carter Administration's "synfuels" agenda targeted huge swaths of public land for tar sands and oil shale projects; nearly all of the Great Basin was to become the sacrificial home to the DOD's MX missile system; and our Governor was pushing Project BOLD, a massive land swap that would affect nearly every wilderness study area, national forest and national park in the State. We were under siege, but we weren't alone.



Our colleagues in neighboring states faced similar battles, confronting unprecedented levels of logging on our national forests and oil and gas development across much of the Southwest and Northern Rockies. While we engaged these battles, we were simultaneously pushing RARE II wilderness bills. It seemed every group fighting the development and land-grabbing schemes was also fighting for Wilderness, and vice-versa. We all had our own priorities, but Wilderness held us together.

Thus, my surprise to hear—at the 40<sup>th</sup> Anniversary of the Wilderness Act conference last fall—a conference speaker profess that he didn't see himself as part of the "public lands movement," but instead as a more narrowly focussed "wilderness activist in Nevada."

That simple statement helped me to understand a growing chasm in our movement and to explain why some folks supporting the new breed of wilderness bills appear willing to give away vast tracks of public land, overturn hard-fought court victories, undercut campaigns to rein-in destructive ATV use, grant favors to commercial interests, and chip away at the safeguards that set Wilderness apart from less-protected public land. It also illuminated why the special interests and politicians who exploit our public lands are having a field day. Our "movement" is so segmented that we no longer share a cohesive vision to confront the challenges facing our public lands or to chart a positive course for the decades to come.

Public lands are our national birthright, a shared heritage held in trust for the whole people. The need for protection has never been more important than today, when we face a movement to treat public lands like a private business venture—making them "pay for themselves" through access fees, commercial developments, and the private sector takeover of responsibilities traditionally done by agency stewards.

The time is now for the public lands community to unify around the highest ideals of our public lands, to get beyond rearguard actions, and to forge a bold vision that can rally concerned citizens. Toward this end, Wilderness Watch has joined with our allies to develop a vision and set of principles to help guide our movement through the troubles we face today, and to build an agenda for protecting all public lands in the future. This "unified public lands campaign" could have great import for Wilderness, as we work to bring the broader community into the cadre of those fighting to protect the values that make our designated Wilderness especially unique. I'll keep you posted.



George Nickas



**The Wilderness Watcher** is the quarterly newsletter of Wilderness Watch, a non-profit organization advocating the protection and responsible stewardship of the nation's designated Wildernesses and Wild & Scenic Rivers.

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# National Park Wilderness – A place to take a stand

— By Sue Gunn

The 40<sup>th</sup> anniversary of the Wilderness Act provides us with an opportunity to take stock of our National Wilderness Preservation System (NWPS). Forty is traditionally an age of reflection. Youth has passed; we have traversed the landscape of young adulthood and now stand in the full glow of our maturity. It provides an opportunity to reflect on the accomplishments and disappointment of life, and to make course corrections to avoid obvious pitfalls in the future. One thing that stands out upon reflection of the first 40 years of the NWPS is the dramatic expansion in Wilderness acreage – starting in 1964 at 9.1 million acres in 13 states and increasing to over 106 million acres in 44 states. Those focused on size might say hurrah, but let's take a deeper look to the actual *status* of those Wilderness lands – particularly within the National Park Service (NPS).

Some, like the new wilderness director of the NPS, will say the agency's wilderness program has improved over the last decade. I suggest that improvement is administrative, providing improved guidance and the establishment of a wilderness steering committee, not in on-the-ground application. For example, The Wilderness Society sued the NPS for 45 bread-and-butter violations of the Wilderness Act. The violations included the agency's failure to evaluate parks for wilderness suitability, the absence of legal boundaries, or the drafting of wilderness management plans.

In the years I worked on public land issues in Washington, DC, I generally found that the environmental community turned its back on national park issues. It seems terminally foolish to ignore NPS abuses, as national park lands are the beloved icons of our nation and should set the gold standard for wilderness stewardship in America. The lands within the national park system were set aside as outstanding examples of a particular resource, possessing exceptional value or quality, providing superlative opportunities for enjoyment and study, and retaining a high degree of integrity as true, accurate, and relatively unspoiled examples of the natural world. The Wilderness found inside our national parks is amongst the most magnificent wild land in the nation or, for that matter, the world. It seems logical to me that this is the place where we need to educate and engage the American public.

We are told the public has no idea what Wilderness is, that Wilderness is an elitist concept that locks up the land. After 40 years, the public has a limited or non-existent understanding of Wilderness and is not engaged in its management or preservation. Sadly, managers of Wilderness



*Citizen involvement could bring Wilderness protection to Grand Canyon Nat'l Park, AZ. WW file photo.*

often lack an understanding of the legal mandate of the Wilderness Act or their own agency's policies. Worse yet, managers are under political pressure to accommodate special interests and anti-conservation theology. We see an increasing number of wilderness bills drafted, some with the blessing of

environmentalists, which include numerous exceptions to the Act. We are also seeing an increasing number of bills that undermine or disembowel existing Wildernesses. For example, the 108<sup>th</sup> Congress was responsible for the first de-designation of Wilderness in the national park system at Cumberland Island National Seashore in Georgia.

Another reason to focus our efforts on national park system Wilderness is because it has the

highest standards for land management of the four federal land management agencies. NPS' policy states it "will take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed." "Wilderness" is defined to include the categories of suitable, study, proposed, recommended and designated. In addition, the Organic Act of 1916 and the 1978 Redwood amendment to the 1970 General Authorities Act created a non-impairment standard for the management of national park system land. The 2001 Management Policies clearly outline the agency's obligation to conserve the land while providing for the enjoyment of park resources and values.



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provisions are becoming paramount in the overall threats to Wilderness nationwide.

Section 4(d) of the Wilderness Act is titled “special provisions.” These so-called *non-conforming uses* are compromises that diminish wilderness character, but were nonetheless written into the original law. They include special provisions for such things as aircraft and motorboat use where previously established, mining, water developments, grazing, commercial services, fire suppression, timber cutting (in the Boundary Waters), and continued regulation of hunting, fishing, and trapping by the various states. These special exceptions are qualified to various degrees so as to provide federal wilderness managers with the ability to regulate these uses so as to minimize their impacts on Wilderness.

It is important to keep in mind that with the exception of honoring private existing rights and for fire management, where Congress gave the Secretary broad discretion, the *Wilderness Act required that the other activities be administered in a way that protects wilderness character*. For instance, the exception for commercial services allows for commercial outfitting and guiding, but those activities must be done in a manner that protects the wilderness character of the areas. In other words, while the Wilderness Act allowed for some non-conforming activities, the law also provides managers with the tools they need to ensure that the impacts from these exceptions would be rare and carefully controlled. Unfortunately, the good intentions of the law are not being realized on the ground.

The responsibility for regulating the uses allowed by special provisions falls to federal agencies that have historically not been supportive of good stewardship. Special interests, especially economic ones, are particularly effective at influencing management and policies. The “nose in the tent” enabled by the special provision soon becomes the entire animal, if not the whole herd running roughshod over the area’s wilderness character. It’s not a matter of an isolated instance or occasional transgression. All four agencies are falling woefully short in meeting their stewardship responsibilities, and these shortcomings transcend the past several administrations. Given the lack of commitment to good stewardship on the part of managers, exceptions in wilderness bills often result in far more damage to wilderness character than was anticipated at the time of designation.

Special provisions that have been included in Wilderness bills since 1980 are proving to be particularly damaging to wilderness character. In all likelihood, the impacts of these exceptions were expected to be small and carefully regulated at the time, but the reality has been far different. Relaxed restrictions on livestock grazing, expanded access to private inholdings, actions of fish and wildlife management agencies, and myriad other exceptions are resulting in consequences far beyond what could ever be considered as appropriate in Wilderness. Similarly, exceptions in some Wilderness bills coupled with rapidly expanding technologies, growing affluence among the general public, and the popularity of



Line camp on a grazing allotment in the Emigrant Wilderness, CA. WW file photo.

motorized recreation have opened some of the most remote Wilderness lands to routine aircraft, jetboat, and snowmobile use.

For example, the 1980 Alaska National Interest Lands Conservation Act (ANILCA) allowed airplane, snowmachine and motorboat use for traditional activities, which to the bill’s supporters were understood to be subsistence uses such as hunting, fishing, and berry-picking. Anti-wilderness interests and their supporters in the agencies, however, have used the special provision to open most of Alaska’s Wilderness to motorized recreation. Today, recreational snowmobiling is a popular pastime on parts of the Kenai Wilderness, and snowmobiles have penetrated nearly every drainage on the north slope of the Brooks Range in the 8 million-acre Arctic National Wildlife Refuge Wilderness. Arctic visitors complain about the inability to escape the drone of airplanes shuttling trophy hunters around the refuge, and landing strips now scar the arctic tundra in places where airplane landings were non-existent at the time of ANILCA.

These examples represent just a few of the challenges presented by special provisions in wilderness bills, but they highlight the *unintended consequences* from making such exceptions. Most managers have proven loathe to regulate these non-conforming uses, thus even when discretionary safeguards have been included in legislation it has proven ineffective for protecting Wilderness character from the harm resulting from special provisions. One can only guess what the extent of damage will be from new wilderness bills being proposed that allow for military training exercises, the construction of telecommunication structures, and that elevate recreation use, stock use, new trail construction, and commercial and other economic interests above preservation of wilderness character.

Some non-conforming uses in Wilderness may seem small, or of little impact in a National Wilderness Preservation System that encompasses more than 660 areas and 106 million acres. But each non-conforming use violates the ideal and integrity of Wilderness and diminishes the wilderness charac-

ter and symbolic value of all Wilderness areas in the system. The cumulative impact of hundreds of non-conforming uses is not small.

Once an exception is made in one bill, it becomes politically harder to exclude exceptions in future wilderness bills. It also becomes psychologically easier for conservationists to accept exceptions and compromises when "it's already been done elsewhere." Adding non-conforming uses and special exceptions in wilderness bills results in lowering the standard for what wilderness means, how we interact with these special places, and diminishes the unique benefits that authentic Wilderness can provide.

In order to protect the quality and integrity of the NWPS and to realize the benefits that authentic Wilderness can and should provide, it is imperative that wilderness advocates stem the use of special provisions in new wilderness bills. Forty years of experience in implementing the Wilderness Act has shown that the special provisions in various wilderness bills are leading to serious degradation to both the Wilderness *ideal* and to Wilderness on the ground. The exceptions in the 1964 Act should be treated as the floor, not the ceiling, for protecting wilderness. Some specific suggestions to address this problem follow:

**1. Avoid non-conforming uses in new wilderness designations;**

**2. Keep wilderness bills brief and free of special management language, even if the intent of the language is simply to reiterate the provisions of the Wilderness Act;**

**3. Minimize the impacts of any new non-conforming uses in wilderness legislation; and**

a) Phase-out the non-conforming uses over time, such as was done with motorboat use in the 1978 Boundary Waters Canoe Area Act;

b) Limit the impacts from non-conforming uses allowed in the Wilderness Act and that might not be phased-out over time. Examples of such use include livestock grazing and some commercial services;

c) Place the non-conforming uses outside of the wilderness boundary if possible.

**4. Consider alternative designations if special provisions that compromise the ability to manage the area as Wilderness can't be avoided and where the goal to prevent other uses such as logging or ATVs can be achieved with another classification.** The Rattlesnake Wilderness and National Recreation Area near Missoula, MT is a good example of how this option can work.

Wilderness advocates must ensure that special provisions in new wilderness bills and incompatible uses in existing wildernesses are not allowed to further degrade the wilderness character of units in the NWPS. We must seize opportunities to stem the erosion of wilderness standards and the gradual degradation of the system that is occurring due to

special provisions in wilderness legislation. By taking an aggressive stance against new non-conforming uses we can ensure that we pass on to future generations the "enduring resource of wilderness" that the founders of the Wilderness Act sought to preserve and that future generations deserve to enjoy.

A full copy of *Keeping the Wild in Wilderness: Minimizing Non-Conforming Uses in the National Wilderness Preservation System* can be obtained by contacting our office or by downloading the pdf at [www.wildernesswatch.org](http://www.wildernesswatch.org).

## Non-conforming Uses



*When snowmobiles were permitted into Alaska Wildernesses in 1980, no one predicted the technological advances that have made remote places accessible, such as here in Denali National Park and Preserve. Photo by the Natural Trails and Waters Coalition.*



*A water truck fills a wildlife "guzzler" in the Cabeza Prieta Wilderness, AZ. The guzzler requires a permanent vehicle route.*



*Special provisions allowed motorized recreation to skyrocket in areas, as seen here in the Frank Church-River of No Return Wilderness, ID.*

# Wilderness Stewardship

## Concepts & Principles

This is the first of a four-part series examining key concepts and principles of wilderness stewardship. The entire series appears in *Wilderness Stewardship - An Activist's Handbook* written and distributed by Wilderness Watch, available this summer.

## Introduction

The overarching legal mandate of the Wilderness Act is to preserve the wilderness character of each area in the National Wilderness Preservation System. Preserving wilderness character is the essential key to keeping alive the very meaning of Wilderness in America; it is therefore the core concept that guides all public uses and management decisions in Wilderness.

The following concepts and principles of Wilderness stewardship revolve around the concept of Wilderness character. They come directly from the Wilderness Act and other writings of the Act's chief author, Howard Zahniser. These concepts and principles form the statutory direction for wilderness stewardship. They are intended to shape and guide human interactions with Wilderness, for it is not just the physical qualities of the landscape that make Wilderness unique, but also the way we relate to Wilderness, the attitude with which we approach these special places, that makes wilderness different from other undeveloped lands.

Exercising humility and restraint in our interactions with Wilderness is what differentiates 'stewardship' from 'management.' Stewardship entails carefully protecting and guarding certain values, qualities, and experiences, both tangible and intangible, that exist in Wilderness. In contrast, a management paradigm is generally more premised on selecting human-centered goals and objectives for a landscape, and then actively shaping and manipulating the landscape and its wildlife to achieve those pre-determined goals. Good wilderness stewardship requires respecting the value of self-willed land, where natural processes prevail and humans do not dominate and control.

## What is Wilderness?

With passage of the Wilderness Act in 1964, Congress created a new statutory land classification and gave the concept of 'Wilderness' a legal definition. The first paragraph of the Wilderness Act refers to an "enduring resource of wilderness," with "resource" being singular. Congress



specifically recognized wilderness as a unique resource in its own right, not just a collection of other natural resources.

Only Congress can designate or undesignate federal lands as Wilderness. Congressional designation as Wilderness provides an area with the highest level of statutory land protection available in the United States. The statutory definition of Wilderness is found in Section 2(c) of the Wilderness Act. According to the canons of statutory interpretation, when reading a specific section of law the first statements in the section are understood to lay out Congress' clear intent and subsequent statements in that same section are understood to support and expound on that legal directive. It's not uncommon to find managers who suggest that within the definition of Wilderness there are contradictory goals or intentions (such as in the phrases *untrammelled* and *natural*), but such belief is contrary to long-established legal principles.

With this in mind, the first sentence of Section 2(c) defines Wilderness as follows:

"A wilderness, *in contrast* with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and community of life are *untrammelled* by man, where man himself is a visitor who does not remain." (emphasis added)

Congress intended that Wilderness remain in contrast to modern civilization, its technologies, conventions, and contrivances. Congress also intended that Wilderness remain untrammelled, meaning free of intentional human manipulation. In Wilderness, the forces of nature and natural processes would be allowed to unfold without intentional human interference. In this definition, Congress defines not only qualities of

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## Wilderness Stewardship, continued from page 6

Wilderness but also provides statutory direction for how humans interact with Wilderness, and what our relationship will be with these places. In Wilderness, Congress clearly intended that humans will not dominate or develop the landscape, and will not control natural processes.

The second sentence in Section 2(c) expands the definition of Wilderness:

“An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

This sentence recognizes that areas designated as Wilderness may have limited signs of past human influence and uses. However, the clear direction in the first sentence of Section 2(c) states that once an area is designated, human influence will be limited so that the earth and its community of life will remain untrammelled from that point forward. ♪



*Murres. WW file photo.*

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## Nat'l Park Wilderness, continued from page 3

You might ask how the first de-designation of national park system Wilderness occurred with such strong policies? The designation of Cumberland Island was an attempt to save one of the last remaining undeveloped barrier islands along the coast of Georgia. The de-designation of three road corridors and a large segment of the most remote land to the north, served the interest of two wealthy families with interests on the island. These changes allowed for one family to continue its commercial jeep tours through Wilderness, and another family to get its land out from under Wilderness protection, potentially making it available for development. The NPS thought it was a fine idea as did Georgia’s elected representatives.

Why not do it differently? Why not engage through inspiration instead fear. Let’s educate the public about NPS Wilderness. Let them develop a muscle protecting land they love and force the park service into performing as it should. We should at least have one agency that manages optimally for Wilderness. There are so many examples of magnificent NPS Wilderness, such as Grand Canyon National Park. The park has been proposed as Wilderness for decades and the river recommended as potential wilderness (a NPS term of art). Currently, river enthusiasts steer clear of this over-crowded, commercialized, motorized river experience. This 240-mile stretch of world-class white water could provide the greatest wilderness experience in America but instead the river is managed for the profit of 16 outfitters and their \$20 million industry.

Why did this happen? I guess you could say Cumberland Island wilderness was run off the road by the designation of Wilderness at Apostle Island National Seashore. The final Interior Appropriations bill had language designating Wilderness at Apostle Island beside language that de-designated Cumberland Island and allowed private citizens to renege on their decades old agreement to vacate their cabins in Kings Canyon National Park. Of course the necessity of this rider seemed a little odd as the Bush Administration was preparing to move the Apostle’s bill forward in the 109<sup>th</sup> Congress. But those pushing for designation didn’t seem to mind that other park service lands were being defiled.

Congress treats our national parks like city parks and turns a blind eye to problems outside their state or district. We need a campaign to educate the American public on NPS’ astounding Wilderness. An informed public could have prevented the loss of Cumberland Island and it could still establish Wilderness on the Colorado River through Grand Canyon National Park. Unfortunately, the environment is barely on the radar of Congress and the environmental community has turned a blind eye to NPS Wilderness. Let’s do it differently by inspiring people to get involved in the protection of national park Wilderness, making it impossible for areas to be degraded or sold to the highest bidder. It’s the least we can do to maintain our natural heritage on our premier public land. ♪

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*Sue Gunn worked as the Director of the National Parks Program at The Wilderness Society for many years. She serves on the WW Board of Directors, is an isotope geochemist by training, and worked for the US Geological Survey prior to her years at TWS.*

## Borderline Wilderness – A trip through the embattled lands of the Cabeza Prieta and Organ Pipe Wildernesses

— By Hilary Wood, outreach coordinator

*Imagine your spring journey into the backcountry of the Cabeza Prieta. Heavy winter rains leave behind a verdant carpet of green; the ocotillo unfurl conical red blooms, banners to attract eager hummingbirds. By midmorning it is already hot, keeping horny toads and jackrabbits to the slim shade of the saguaros. Things cool as the sun dips behind the sharp upheaval of the Growler Mountains, the evening light bringing every spine and sun-baked pebble into startling contrast - desert light.*

*Things change in the night. The stars hover close above your head, owls and bats navigate an obstacle course of creosote and cacti. Sleep takes you, only to be disturbed by the sound of motors. Motors so deep in the Wilderness? Headlights illuminate your tent walls, and from the height of your camp you witness a high-speed car chase through the desert. A vehicle trailed relentlessly by two Border Patrol jeeps, lights flashing. As you drift back into dreams, you are awakened by the sound of feet, low talking. A line of illegal immigrants files past, hands clasping jugs of water, street shoes unraveling from rough desert travel. It's no dream – dawn reveals stark vehicle tracks and your camp has somehow acquired a discarded tuna can. As you bend to pick it up, the roar of engines makes you duck your head as jets from the nearby bombing range speed overhead. Hiking back to the dirt road where you left your car, you find smashed windows, ripped vinyl, hanging wires – a failed attempt at hotwiring. Your lucky it's there at all.*

The Cabeza Prieta and Organ Pipe Wildernesses on the US/Mexico border in Arizona are arguably the most embattled Wilderness areas in the nation. As reported in the March 2004 issue of *Wilderness Watcher*, these incomparable areas are riddled with impacts from drug smuggling, illegal immigration and border patrol actions aimed at stopping these offenses. Illegal activity in both Wildernesses surged in 1999 after the border patrol cracked down on traditional crossing areas in urban California. The border patrol mistakenly believed that the desert Wildernesses would serve as a natural barrier to illegal immigration and smuggling – an idea that quickly proved wrong. While the scenario detailed above describes a particularly unlucky “wilderness experience”, it is not as hyperbolic as one might wish – the above-listed activities do happen, and not just in the nighttime.

In March, Sonoran Desert Protectors sponsored a two-day Writer's Tour to view the on-the-ground abuse in the Organ Pipe and Cabeza Prieta Wildernesses. The goal was to educate the media and concerned activists about the embattled status of the Congressionally designated Wilderness on the US/Mexico border. As the communications coordinator for Wilderness Watch, I was invited to join representatives from



*Vehicle barrier, patrol activities and curious visitors adjacent to the Organ Pipe Nat'l Monument Wilderness, US/Mexico border, 2005. WW file photo.*

the National Park Service, Fish and Wildlife Service, Arizona Wilderness Coalition, Great Old Broads for Wilderness, a staff person for Senator John McCain, and writers from major Arizona newspapers to view what is really happening to these beautiful areas.

Our first morning was spent viewing the vehicle barrier on the US/Mexico border in the Organ Pipe Cactus Wilderness. Started in 2004 to stop vehicles from crossing into Wilderness, the barrier is constructed of vertical steel posts spaced roughly four feet apart connected by a steel crossbeam. Children from nearby houses hang off the posts, practicing their English while we stumble with Spanish. Though the barrier is not yet completed and will do little to stop illegal foot traffic, in time it should run the entire 29-mile length of Organ Pipe's border with Mexico. It is hoped that the barrier will deter motorized trespass, as there are already 230 miles of illegal roads in the Wilderness ranging from rough tracks to well-established roads. These roads are the visible scars of smuggling, both human and drug, and will mar the desert for years to come.



Our next stop is the trailhead for Dripping Spring and White Pass, and following our armed escort, we head out towards a rocky outcrop in the distance. After a winter of heavy rain, the reddish soil is flushed with color – the deep pink bloom of the hedgehog cactus, the yellow beacons of brittle bush, and a wide spectrum of greens. It is beautiful, almost unearthly, and then we hit the trash. Discarded tuna cans, sardines and water bottles, bedraggled socks, pants, and sweatshirts. Once you see the first pieces your eyes are opened to the rest – alone and in piles, the trash spreads back into the untracked Wilderness. It is the detritus of desperation, left behind by illegal immigrants sometimes totally unprepared for a desert journey. The immigrants are often led by hired guides, known as coyotes, and can face death from the elements if abandoned - as happened to a group of 14 crossing the neighboring Cabeza Prieta Wilderness in 2001.

Our hosts equipped us with trash bags, but there is so much to gather we make very little progress and are told to reserve our efforts for the pass. We pass signs of drug smugglers, a much rougher group than the typically resigned immigrants, and see their graffiti on rock walls and saguaros. At the pass we find a ceramic bust of a man, thick-mustached and surrounded by candles. Our guides are as surprised as we are, though they know the man is considered a kind of patron saint to drug smugglers. The shrine is taken away in a backpack, and for the next 30 minutes we work to remove trash from the area in dozens of bags.

The next day we are in the Cabeza Prieta Wildlife Refuge, bumping along the historic El Camino del Diablo, or Highway of the Devil. Used by travelers to get from Mexico to Spanish settlements in what is now California, the unpaved Camino is flanked by Congressionally designated Wilderness for much of its length. As the Cabeza Prieta has yet to build a vehicle barrier along its border, we are able to see numerous illegal roads and tracks heading off into the desert. Some of the tracks are undoubtedly made by Border Patrol, who often pursue smugglers despite wilderness protections. The Camino itself braids in sections where water or fine silt sinks have eroded the main road, the new tracks moving increasingly close to, and maybe even over, the Wilderness boundary.

We make slow progress on the Camino, as the track is eroded and requires 4-wheel drive. The road is used by Border Patrol, and we are passed by one Humvee towing another and a handful of jeeps steered by stern faced young men. Through the vast plains of cactus and rock outcroppings, it is possible to view abandoned cars, the windshields and hoods reflecting the desert sun. These vehicles were abandoned by smugglers who have either been caught, gotten stuck, or suffered mechanical problems. The hulks pose a challenge for refuge managers, who aim to remove them from the Wilderness without further harming the resource. The best way to accomplish this is by helicopter, but the cost is higher. Another available option is to drive a tow truck into the Wilderness and haul the vehicles out. We are told that often the best option is to leave the cars, unless they appear stolen from nearby Tucson or Phoenix (managers have found abandoned cars with Alaska license plates).

Our destination is a Border Patrol outpost along the Camino. As we bounce along we are regaled by stories of



*Crossroad of illegal tracks, Cabeza Prieta (top); smuggler shrine, Organ Pipe (left); trash collected in 20 minutes, Organ Pipe (right). WW file photos.*

Wilderness mishaps: how visitors wishing to hike in Cabeza should store water and food away from their car in case it is gone upon their return; and how one couple pulled over to help a man sprawled in the road and had their vehicle stolen. Though I am used to taking precautions with grizzly bears and river crossings, the challenges found on the Cabeza are a whole new game.

The outpost, Camp Grip, is situated within the non-Wilderness buffer zone along the Camino. Sided in corrugated metal, the building is largely windowless and is powered by large generators set out in the sand. Inside, we are told to keep our voices down as the back area serves as a bunkroom for night patrollers. A large screen TV plays CNN in the corner, while the main wall is taken up by a map of the Cabeza covered with colored tags marking places where a patrol has picked up immigrants. A smaller poster details the Wilderness regulations of the Cabeza, with special emphasis on the endangered desert pronghorn. The patrolmen are polite and a little amused, surprised to see a group of journalists this far out in the desert. They had picked up our footsteps on seismic sensors earlier in the day, but were reassured by the refuge vehicles. I can't help wonder what would happen to casual visitors venturing off the Camino for a hike in the desert.

Heading home through the gathering dusk, the land spreads out in uninterrupted splendor. It is too dim to see the abandoned cars, the illegal roads, the trash and graffitied cacti. At this hour, it looks just as Congress intended – a vast, pristine stretch of solitude where natural processes reign supreme. Despite the overwhelming challenges these areas face, there is always hope – hope that the people who love them will fight for their protection, hope that some future economic equity will end the desperate race across the border. Until then, the Organ Pipe and Cabeza Prieta will remain embattled, a place where the stark realities of the human world impinge on those of the natural. 🌵

# On the Watch

## Tongass Nat'l Forest Wildernesses, AK

**Maximum Tool** - The Forest Service is reviewing a proposal to use helicopters to access 900+ vegetation monitoring plots in Tongass Wildernesses over the next 10 years. The Forest Service determined that the use of helicopters was the minimum action necessary for achieving the project, as well as the minimum tool for safety and accessibility. Several years ago this same proposal was approved on the Tongass, but reversed by the Chief of the Forest Service upon appeal. Now, in a new political climate, it's back on the table.

The proposal originated with the Forest Inventory Analysis team, a research group charged with monitoring vegetation resources on regional national forest lands. Data from the Tongass will be combined with the similar projects across the country to form a statistically uniform nationwide grid of monitoring plots. Each regional research station is charged with accessing 10% of the study plots each year to conduct vegetation inventories.

Though access for monitoring in other Wildernesses is accomplished by foot, boat, or horseback, the team claims that ground access is too dangerous, citing bears, sprained ankles, and steep slippery terrain. If the proposal is approved, the Tongass will be the only forest in the country using helicopters for vegetation studies.

Wilderness Watch is critical of the agency's determination, as motorized equipment can only be used in Wilderness to protect the wilderness resource or in matters of public safety. As invasive species are not currently present, invading wilderness with helicopters for unnecessary monitoring damages Wilderness rather than protecting it. So far, it looks like the project represents further slippage in the agency's respect for Wilderness.

## Absaroka - Beartooth Wilderness, MT

**New Chapter** - In 2002, a federal judge rejected a landowner's proposal to build nine miles of road, at taxpayers' expense, into his inholding in the Absaroka-Beartooth Wilderness. The landowner bought the 124-acre mining claim in 1991 and, though it had been designated Wilderness for thirteen years, planned to develop it into a resort. In an excellent ruling for Wilderness, the judge held that the Forest Service could deny the landowner motorized access in accordance with the Wilderness Act.

Wilderness Watch recently learned that the landowner



*Tongass vegetation. WW file photo.*

sold his claim to George Matelich, a resident of New York who owns other land in Montana. The new owner has not expressed any intentions of developing the claims, saying only that he wants "to be a good neighbor." We hope that the new owner will respect the wilderness character of the Absaroka-Beartooth and not seek to develop it through motorized means.

## Lusk Creek Wilderness, IL

**Walking Circuit** - For years local Illinois activists have struggled to get the Forest Service to regulate excessive equestrian use resulting in damage to soils, streams and vegetation in the Lusk Creek Wilderness and other Wildernesses on the Shawnee National Forest (See December 2004 *On the Watch*). The activists argued their own case before federal district court Judge J. Phil Gilbert, convincing him to direct the agency to issue special use permits to the commercial horse camps that provide commercial guides for equestrian day-trips into the wilderness. After more than a year the USFS had not prepared nor issued a single commercial outfitter-guide permit.

This January, Judge Gilbert announced he was going to traverse the Lusk Creek Wilderness with all parties so he could see the on-the-ground situation for himself. Accompanied by federal marshals, the court clerk, Forest Service officials, representatives for the commercial horse camps, and the two plaintiffs, the Judge reportedly described the trip as "enlightening" and "unbelievably beneficial." He plans to keep an eye on how well the Forest Service enforces protections for the area by scheduling additional visits this summer, fall, and possibly next spring.

## Norse Peak Wilderness, WA

**Natural Progression** – This spring, the Forest Service decided to allow the Big Crow Basin shelter along the Pacific Crest Trail to naturally decay into the Norse Peak Wilderness. The shelter was built in the 1930's before the area was designated, and has never been maintained by the agency.

Certain groups argued that the shelter should be repaired and maintained under the National Historic Preservation Act. Wilderness Watch objected to restoring and maintaining an unnecessary structure in Wilderness, and suggested recording the shelter's historic values through photographic and written documentation. After three years of deliberation the agency decided that restoring and maintaining the shelter would be incompatible with the primitive character of the wilderness. The shelter's historic values will be documented and the shelter will be allowed to decay back into the forest at the end of its natural lifespan.

If you'd like to send a 'thank you' to the Forest Service for its good decision for the Norse Peak Wilderness, you can address your letter to: Randall Shepard, Naches District Ranger, Wenatchee Nat'l Forest, 10237 Hwy. 12 Naches, WA 98937; rdshepard@fs.fed.us

## South Baranof Wilderness, AK

**Commercial Capitulation:** The Forest Service plans to issue five, 5-year special use permits to commercial outfitting operations using floatplanes for day access to certain lakes in the South Baranof Wilderness. This decision comes despite a seeming lack of public need, as current use of the lakes is largely unguided hunting and camping. The decision represents a significant and unprecedented expansion of motorized airplane access by commercial enterprises, and will directly affect the island's wilderness character.

Wilderness Watch first commented on this proposal in 2001, stating that allowing an unnecessary surge in commercial aircraft use violates the agency's statutory obligation to protect wilderness character. The Forest Service is not required by law to grant motorized airplane access for commercial use, and is instead charged with regulating any existing use to protect the wilderness resource. The allowed use – 400 visitor days per outfitter per year - far exceeds historic access levels for commercial enterprises in the area, and is not even supported by a show of need.

The proposed plan clearly violates the desired condition for the area as detailed by the agency's own EA as continuing to provide solitude and remoteness, with motorized and mechanical use limited to the minimum actually needed. Wilderness Watch is working with other conservation groups in Alaska to review options for challenging the Forest Service's decision.

## Palisades Wilderness Study Area, WY

**Permit Withdrawn** – The Forest Service recently withdrew its decision to permit a heli-skiing company to conduct 1,200 skier days in the Bridger-Teton National Forest, including 135,000 acres of the Palisades Wilderness Study Area. A coalition of conservation groups challenged the original authorization, claiming that the agency failed to properly consider the impacts of such use on wildlife and the Palisades' wilderness values. Though the agency has withdrawn the permit for further evaluation, the skiing company can continue its present level of use (832 skier days) for this winter season.

Wilderness Watch commented on the original plan, noting that by law wilderness study areas must be managed to preserve their wilderness character by prohibiting uses that would impede future designation as Wilderness. The level of heli-skiing use initially authorized by the Forest Service not only impacts wilderness values, but allows incompatible commercial use to become entrenched in the area.



## Kalmiopsis Wilderness, OR

**Motorized Access Denied:** In January, Federal Magistrate John P. Cooney held that the "undisputed evidence" before him demonstrated that a landowner's claim to unlimited motorized access to build a destination resort on his mining claim in the Kalmiopsis Wilderness held no merit. In a potentially precedent-setting decision, the Judge found that the Wilderness Act of 1964's language prohibiting permanent roads within Wilderness placed the public on notice that the law did not recognize any permanent roads or historic rights-of-way located within the Kalmiopsis Wilderness. Any private party claims to a right-of-way would need to be brought within the 12-year statute of limitations, i.e. no later than 1976. As the plaintiffs purchased the land for \$150 in 1988 and did not file suit until 1999, they were barred by law from asserting a claim.

Working with the Siskiyou Regional Education Project and the Western Environmental Law Center, Wilderness Watch has fought to keep a developed road and motorized access out of the Kalmiopsis Wilderness. Last spring, we settled with the Forest Service when it withdrew its Record of Decision granting the landowner's motorized access. When the inholder challenged the Forest Service's right to regulate his access under RS-2477 and other statutes, Wilderness Watch intervened in the case as an interested party (see *Wilderness Watcher*, July 2004). If the Magistrate Judge's recommendations are adopted by the District Court, it will send a clear message that speculative rights-of-way claims filed years after Wilderness designation will be appropriately barred from consideration.



# Wilderness Study Area Debacle

— By *Howie Wolke*

**Editor's note:** The Wilderness Act's principle mandate for stewardship is to preserve each area's wilderness character. While neither the law nor the courts have ever defined specifically what those words mean, a couple of lawsuits involving congressionally designated wilderness study areas in Montana could change that. Adding to the controversy is that even conservationists in Montana don't agree on what the law should require. In the article below, long-time Montana wilderness activist and WW Board Member Howie Wolke describes the issues surrounding these WSAs.



The last true statesman to represent Montana in Congress was the late Senator Lee Metcalf. In 1977, Metcalf ushered into law S-393, the Montana Wilderness Study Areas Act. This law instructed the Forest Service to preserve the existing wilderness character of 10 new national forest Wilderness Study Areas (WSAs), so that the option of future wilderness designation would remain viable. The bill was written primarily by Clif Merritt, then the Western Regional Field Director of The Wilderness Society, and now a member of the Wilderness Watch Advisory Council. Three of the original WSAs have subsequently been released: one to development (it has since been roaded and logged); one to create the Elkhorn Mountains Wildlife Management Area; and one was designated in part as the Lee Metcalf Wilderness. The other seven WSAs remain wild and roadless.

These magnificent wildlands range from high mountains rising above the prairie to the densely-timbered Blue Joint area on the Idaho border, a proposed addition to the Frank Church-River of No Return Wilderness, the largest Wilderness area in the lower 48 states. Perhaps the quintessential WSA is the Gallatin Range, 150,000 acres contiguous with over 300,000 roadless acres in Yellowstone National Park. Abused and scarred in places by increasing numbers of ATV's, the Gallatins support grizzlies and wolves, and include some of the best wildlife habitat in the U.S. In fact, all of these threatened bastions of primeval magic are characterized by great habitat, places where both two and four-legged beings can find peace and security in an increasingly tumultuous and insecure world. Montana conservationists view these wildland gems as obvious future additions to the National Wilderness Preservation System.

The Forest Service has repeatedly violated both the spirit and intent of S-393. Throughout these threatened wildlands, the agency has encouraged increasing numbers of snowmachines, dirt bikes, and 4-wheeled ATV's. This has created erosion, stream siltation, weed invasion, air and noise pollution, and the disruption and displacement of various



*Hyalite-Porcupine-Buffalo Horn WSA, Montana. Photo by Howie Wolke.*

wildlife populations, including the probable disruption of high altitude winter denning of lynx and wolverine. In the Sapphires WSA on the Bitterroot and Deer Lodge National Forests, the Forest Service even bulldozed ATV routes through the fragile high country, claiming the necessity to localize and control ongoing resource damage. That's like trying to cure lung cancer with more cigarettes!

Virtually all of the S-393 lands are suffering. Remember, in 1977 snowmachines dared not tread the steep deep remote

folds of high mountain powder that their newer more powerful counterparts now routinely track. And four-wheelers didn't even exist. These are key points, because S-393 clearly instructs the Forest Service to maintain, at a minimum, the level of wilderness character that existed in 1977.

Gaining Wilderness status for these lands will be especially tough, given the growing anti-wilderness motorized constituencies that the Forest Service has encouraged. In addition, when we do succeed in getting at least some of these

When we do succeed in getting some of these lands designated Wilderness, managing them as real Wilderness - that is, fixing the physical damage and preventing motorized trespass - will be a nightmarish challenge.

lands designated Wilderness, managing them as real Wilderness – that is, fixing the physical damage and preventing motorized trespass- will be a nightmarish challenge. This mismanagement also increases the likelihood that future Wilderness boundaries will exclude popular motor playgrounds, creating small amoeba-shaped Wildernesses subject to various ecological problems associated with a high edge to interior ratio. Weed infestations, vehicle trespass, poaching, and disturbance of sensitive wildlife populations are among those problems. Unlike the Forest Service, many Montana wilderness advocates are not oblivious to this problem.

So far, two lawsuits have been filed. First, the Montana Wilderness Association (MWA) and Friends of the Bitterroot sued the Forest Service over generalized WSA mismanagement. The district court ruled in their favor, holding that the Forest Service has violated its responsibility to protect the area's wilderness character. A federal appeals court upheld the determination that wilderness character must be preserved, but sent the case back to the district court to define more precisely what that means. A ruling on that point not only has huge implications for Montana's WSAs, it has potential ramifications for the National Wilderness Preservation System as a whole. Unfortunately, while the case winds through court nothing has been done to reduce ATV and snowmachine use or to reclaim recent damage.

More recently, a small citizens group in Lewistown, Montana – the Central Montana Wildlands Association (CMWA) – filed suit against the Lewis and Clark National Forest's proposed winter use plan for the Big Snowies WSA. The Snowy Mountains are a lovely escarpment of forest, meadow and profuse wildlife rising majestically above the shortgrass prairies, wheat fields and piney breaks of central Montana. The proposed winter use plan would allow substantial snowmobile use in the WSA.

Given the language in S-393 that requires preserving the areas' current (1977) wilderness character, and court rulings to



ORV damage, Hyalite-Porcupine-Buffalo Horn WSA. Photo by Bill Cunningham.

date that have upheld this standard, it seems to follow that increased use levels and the resulting physical damage are illegal. It would also seem to argue that new uses such as four-wheelers and snowmachine use in areas that were inaccessible in 1977, are illegal as well.

Unfortunately, the conservation community has failed to present a united front for maintaining the integrity of these wildlands, or for upholding a meaningful standard for what constitutes degradation of wilderness character. For example, while CMWA (represented by The Ecology Center) went to court over the Snowies, MWA entered into negotiations with a snowmachine group and the Forest Service. They reached an agreement in which about 15,000 acres of the 98,000 acre Snowy Mountains WSA would be open to unlimited snowmachine use, thus effectively reducing the size of the WSA. Although MWA believes that reaching this agreement will benefit Wilderness in the long run by limiting snowmachines to one 20,000 acre area, CMWA disagrees, arguing that Congress intended for the entire WSA to be protected and that once snowmobiles gain a foot-hold, the rest of the Snowies will be impossible to defend. By agreeing to expanded use of snowmobiles within the WSA, the MWA-snowmobilers' deal also casts a shadow over a wilderness-friendly interpretation of what is meant by pre-existing wilderness character. CMWA's outrage was boosted when on Dec. 2, 2004, MWA and the snowmachiners intervened together in the locals' lawsuit, on behalf of the Forest Service.

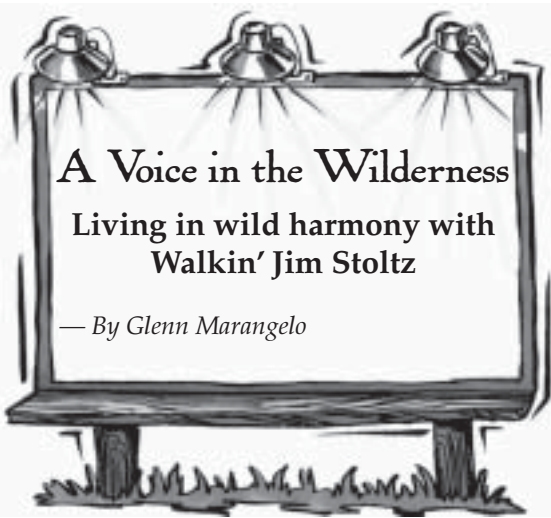
At least in one sense Montana conservationists are united in the belief that our portion of the National Wilderness Preservation System is grossly incomplete. Many if not most of our remaining roadless wildlands can best be protected as Wilderness Areas, and they should be managed to stay wild, under the provisions of the Wilderness Act of 1964. New Wilderness designations should avoid compromises that make good wilderness stewardship impossible. From the standpoint of wild Wilderness that really protects native biodiversity and natural processes, it would behoove our movement to eschew strategies that might result in truncated amoeba-shaped edge-dominated undefendable wilderness boundaries – a scenario that ultimately threatens to make good Wilderness stewardship impossible and to mock the very idea of Wilderness.

**What you can do:** Comment on the Gallatin Travel Plan by 5/14 asking the Forest Service to eliminate all motorized use on the Gallatin Range WSA to protect its wild character. Comments may be sent by mail or email to:

Gallatin National Forest  
P.O. Box 130  
Bozeman, MT 59771  
mailroom\_r1\_gallatin@fs.fed.us

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*Howie Wolke is a professional Wilderness guide and wildland conservationist. He is widely recognized as one of the top Wilderness/public lands experts in the U.S. and has worked as an organizer, lobbyist, and board member (he is the Vice President of WW). Howie has written two books on the American Wilderness plus numerous articles and papers on wildland conservation.*



## Activist Spotlight

They don't call him Walkin' Jim for nothing. The Appalachian Trail ... a coast to coast backcountry hike ... three different treks from Mexico to Canada ... a Yellowstone to Yukon hike — these are just a few of the trips that contribute to the more than 25,000 miles that Jim Stoltz has logged over the years on his annual treks.

To say that Jim has a passion for Wilderness and wildlands is an understatement. His passion not only puts the spring into his many, many steps, but it fuels his focus to protect this planet's remaining wild places. Through his songs, concerts, books, and paintings, Jim stresses the vital importance of citizen involvement in Wilderness protection:

"The folks in Congress do not know wilderness. They do not know the value of an unblemished skyline, or the sight of a grizzly bear galloping across a mountainside. They can't grasp the importance of a spotted owl or for that matter a lowly prairie dog. They've never felt the power of the old growth forests or the silence of the Utah canyons. You need to tell them about these things. You must share your feelings about life and nature and how precious they are. Those who are making the decisions need to know."

As one of America's most unique folksingers, Jim's lyrics express a great love and respect for the Earth and the Wilderness he knows so well. The majority of his songs are penned while exploring the backcountry. Known for his powerful baritone and emotion-packed vocals, he also spends part of each year touring across America performing his award-winning concert, *Forever Wild*. The show combines live music and his poetic words with stunning, multi-image slides. The mix of photographs and music results in a stirring celebration of Wilderness.

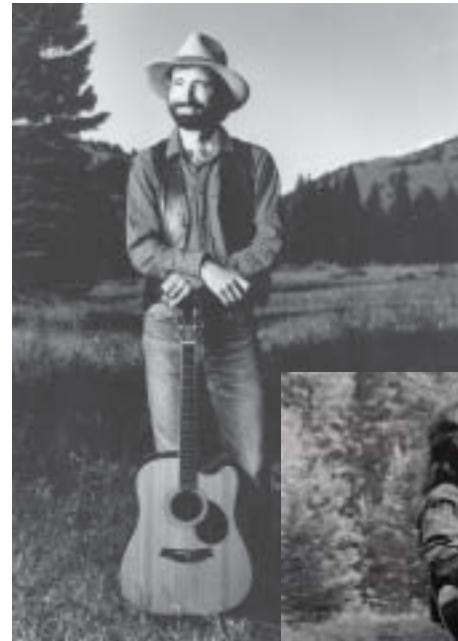
Walkin' Jim is a veteran of 30 years of performing and has been presented with the Environmental Protection Agency's Outstanding Achievement Award for his sharing of nature and wilderness across America. Jim's shows are not only an avenue through which to share his passion for Wilderness, but

an opportunity to educate and involve others in wildland preservation. Edward Abbey, the late author of many nature classics, described Stoltz as "a music man of exuberance and passion, with more to say in one song than Frank Sinatra ever managed in a whole bloody concert."

In 1998 Jim co-founded M.U.S.E. (Musicians United to Sustain the Environment), a non-profit organization dedicated to using music to benefit Wilderness and wildlife causes. In addition Jim's *Wild Wind Records* also gives 5 to 10% of earnings each year to Wilderness protection efforts.

Jim is life member of Wilderness Watch. And with his passion for Wilderness and generous nature, he's continually been there to help us in many ways throughout the years. With the recent release of his book *Walking With The Wild Wind*, Jim has extended a generous offer for Wilderness Watch members in support of our mission. Customers who buy Walkin' Jim's CD's or books from his website ([www.walkinjim.com](http://www.walkinjim.com)) can have a \$5 portion of each of Jim's items purchased donated to Wilderness Watch by entering "WILDWA" in the "contribution code" section of the on-line order form.

Our sincere thanks go out to Jim for all of his work on behalf of Wilderness and for introducing so many people across the country to the spirit and wonder of our Wilderness heritage. ♪





# Help us keep it wild!

Deserts, mountains, hardwood forests, alpine meadows, swamps, prairie ... Wilderness comes in many forms. And so can your support of Wilderness Watch's efforts to protect America's Wilderness heritage.

Wilderness Watch is the only conservation organization fighting day in and day out to protect our National Wilderness Preservation System and Wild and Scenic Rivers System - assuring a wild tomorrow for future generations. But we can't do it without you!

Take a moment to renew your membership, become a member, make that special donation, or make a lasting commitment to Wilderness preservation as a monthly donor or with a memorial gift or bequest. Your support makes a lasting difference.

## Join Our Wilderness Legacy Donor Program!

Make donating easier, increase the impact of your giving, and help reduce administrative costs (allowing even more of your gift to go directly to our protection efforts) -- consider becoming a Wilderness Legacy donor today!

For as little as 33 cents per day, what amounts to daily spare change, you can make a difference for Wilderness each day. A monthly or quarterly contribution will automatically be transferred from your checking account or charged to your Visa or Mastercard. It's easy. It's fast. And no more renewal notices!

Call, write, or e-mail Glenn at (406) 542-2048 or gmarangelo@wildernesswatch.org for more information.

## On-Line Donations

Want the simplicity of donating from your desktop? Then go to our secure on-line donation page at [www.wildernesswatch.org](http://www.wildernesswatch.org) to make a donation or renew your membership using your Visa or Mastercard.



## Memorial Gifts and Bequests

Assure that the Wilderness lands that enrich your life remain forever wild. Consider Wilderness Watch in your estate planning. Memorial gifts and bequests provide long-term support for the protection of America's National Wilderness Preservation System -- leaving a wild legacy for future generations. Give us a call at (406) 542-2048 with any questions.

If you wish to make a provision in your will, the following general form is suggested:

*"I give, devise and bequeath to Wilderness Watch (FEIN 81-0457646), a Montana not-for-profit corporation, located on the date hereof at 208 E. Main St., 3rd Floor, Missoula, MT, 59802, the sum of \$\_\_\_\_\_ (or specifically described property)."*

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## Yes! I would like to make a contribution and help defend Wilderness!!!

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# Thank You!

Wilderness Watch would like to thank Working Assets and our members for their kind support on the 2004 Charitable Donations Ballot. The donation goes a long way in our work to protect America's Wilderness and Wild Rivers - our invaluable wild heritage!

To learn about Working Assets visit <http://www.workingassets.com>



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