

## Torching the "Range of Light"

By Mason Parker

Moved by the radiance of sunbursts bouncing between granite peaks, John Muir once called the Sierras the "Range of Light." Now, a century later, millions of acres of Wilderness and wild forest in the Range of Light are under threat of reckless cutting and incineration at the hands of those tasked with guarding them. Threatened and endangered wildlife like the spotted owl, wolverine, and Pacific fisher are facing displacement and death based on shoddy fire science and manufactured panic surrounding wildfire and the climate crisis. The nexus of ecological crises that we live under are being weaponized to fuel misguided fear of fire and justify bloated wildfire budgets. The *Sierra and Sequoia Prescribed Burn Project* encapsulates the agencies' endgame—Wilderness where nothing is wild and no fires burn unless the agency lights them. How did we get here, and how do we liberate Wilderness from the hands of its "stewards?"

In May of this year, the Forest Service released a draft decision, bringing them closer to thinning and burning

up to 2.4 million acres of national forest in California's High Sierra, including 800,000 acres across eleven Wildernesses including the Ansel Adams, Monarch, Golden Trout, Jennie Lakes, and John Muir Wilderness-

es. The *Sierra and Sequoia Prescribed Burn Project* would move forward in 5-year increments, seemingly in perpetuity, with no further opportunity for public comment. This burning and thinning would include chainsaw and helicopter use throughout Wilderness, as well as drones dropping incendiary devices and setting the forests ablaze. The project would mark a new and unprecedented era of human manipulation of Wilderness.



Ansel Adams Wilderness by René Voss

In 2022, the government spent over \$6 billion on wild-land fire management, with more than half of that going towards suppression. For years, this allocation of funding led to the damaging practice of "fire borrowing," in which funds were diverted from other Forest Service programs to cover suppression costs. While a 2018 law largely ended this practice, the financial pressure it created left

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### *In This Issue:*



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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P.O. Box 9175  
Missoula, MT 59807  
(406) 542-2048  
wild@wildernesswatch.org  
wildernesswatch.org

# Finding hope and a vision in dark times



History teaches us that often the darkest, gloomiest times turn out to be remarkable incubators of innovation generating positive, enduring outcomes.

One such time on our public lands was in the 1920s and 1930s when cattle, sheep, and horses roamed wherever they could find forage, eating vegetation down to the roots. Soils became bare, water sources were trampled, and invasive weeds were choking out native plants. To make matters worse, without plant cover, a prolonged drought, heat, and winds in the Great Plains stripped away topsoil. The situation seemed hopeless.

Despite the dire situation, the disaster spurred many major, lasting improvements. Congress passed the Taylor Grazing Act creating the U.S. Grazing Service to manage livestock, set up grazing districts and a permit system to control herd numbers, and began to restore vegetation and prevent erosion. This agency later became the Bureau of Land Management (BLM) charged with a broader conservation mission, and over time, laws shifted the BLM from primarily a resource-extraction focus to more emphasis on ecological stewardship, including wilderness management on its lands.

After our last newsletter espousing a new wilderness agency, one reader wrote:

*We need to be doing more looking forward to what comes next so we can present a positive plan for the future. Protest alone isn't going to cut it. Democrats are viewed very poorly, and it's due in part to failing to deliver in office and in part to not having a clear plan of action that appealed to the majority of the voting public. They lacked a Project 2025 and need a Project 2026 and 2028.*

We need to reject returning to the status quo, in which wilderness stewardship was diminished decade after decade by both Democrats and Republicans. Yes, Rome is burning now, but we know there will come a day when we have the opportunity to build anew.

After six decades working with the Wilderness Act, we know what doesn't work beyond perennial, inadequate funding. While land management agencies have many foresters, biologists, hydrologists, and other specialists, wilderness specialists are hard to find. Line officers oversee wilderness management but lack experience or accountability. And the wilderness resource is often viewed as the poor stepsister to front country recreation, which is more visible to more people and access issues dominate. These are just a few examples of the dynamics that need fixing.

As we examine what is broken and why, in the development of a new stewardship model, the tailwind behind our back will be the American public. They didn't vote for haphazard decisions resulting in the public land carnage underway. Instead, public support for conservation is consistently strong and widespread, crossing political, geographic, and demographic boundaries. The National Park Service with its preservation mission enjoys some of the highest public favorability ratings among federal agencies—often over 80 percent approval in major surveys. A similar percentage of Americans, spanning party lines, support protecting forests and wildlife refuges.

With so much uncertainty surrounding the stewardship of our National Wilderness Preservation System, one thing is undeniable and should not be underestimated: the Wilderness Watch board, staff, and members will passionately care and tirelessly advocate for Wilderness—in policy, in the courts, and in our hearts. 🌿

—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 agency vulnerable to new priorities, and the fix is set to expire in 2027. The Forest Service has to justify its budget in reports highlighting actions in terms of fires suppressed and acres treated. It is action for the sake of action, which is antithetical to the idea of Wilderness.

The *Sierra and Sequoia Prescribed Burn Project* is only the latest in a long line of projects that land management agencies have tried to push through under the umbrella of "conditions-based management" or CBM. Under the CBM approach, the Forest Service proposed a massive project area through a single environmental assessment, rather than a more robust environmental impact statement, foregoing any additional opportunity for public input. While the agencies claim that CBM is not a "get-out-of-NEPA-free card," in reality this is exactly what CBM is.

How else can one characterize a project that will continue into the future, seemingly forever, across 2.4 million acres, without any further opportunity for public input?

The agencies have created an internal system for wilderness management which pits elements of wilderness character against one another, justifying the trammelling of Wilderness using motorized tools and helicopters to "restore" Wilderness to a desired state of *naturalness*. But what does *naturalness* mean and how do you define it, especially in the age of perpetual and omnipresent human impacts? There is a fundamental contradiction in coercing Wilderness into *naturalness*—it is, by the very act of coercion, unnatural. Under the *Burn Project*, the Forest Service proposes to strong-arm Wilderness into a pre-global warming "desired condition" of *naturalness*, while in the midst of an ongoing climate crisis. At the end of the day, the agencies are simply using the idea of *naturalness* to justify any and all projects they wish to carry out for the sake of appeasing politicians and imposing managers' desired conditions on the landscape.

Ironically, the Forest Service attempts to justify ecosystem-level manipulation of Wilderness by pointing to the nebulous boogeyman of *climate change*. I'm no climatologist, but my understanding of climate change is that it's expected to get worse. Our models are increasingly unreliable because they are based on a planet that no longer exists. If at any moment you are adjusting your management approach to current climate conditions, your baseline will be out-of-date in a few short years. Unless the Forest Service

has a crystal ball, or better climate modeling than anything we've seen up to this point, managing for climate change is like shooting at a target that's not only moving, it's invisible.

It is argued that in the anthropocene nothing exists beyond the thrall of human impacts, including Wilderness. Perhaps, but there must be spaces where we simply observe how the land adapts to climate change, while humanity tries to get its act together outside these small, important places. This understanding of Wilderness, as a control used to measure

scientific research and management strategies, was highlighted repeatedly in the congressional records leading up to the passage of the Wilderness Act in 1964; "The Bill sets up areas which can be used as yardsticks," and Wilderness is "of irreplaceable value to science as sites for fundamental research and as check areas where none of the human factors being

compared by investigators have been operative." Aldo Leopold himself said, "A science of land health needs... a base datum of normality, a picture of how healthy land maintains itself as an organism...the most perfect norm is wilderness."

The Wilderness Act was not an attempt at returning to some idyllic, pristine past—it is a forward-thinking document that sought to minimize human impacts on these lands from the moment of their designation on, creating living, breathing, experiential textbooks that can teach us about evolution and adaptation—but we have to let them. All the while, the Forest Service shows no sign of letting up in its culture of large-scale fire suppression. It seems the ideal world for managers is one in which no fires happen unless they are the ones setting them, completely eradicating the *wild* from *wildfire* and *Wilderness*.

All of these factors have created the circumstances under which a project like the *Sierra and Sequoia Prescribed Burn* could exist, ultimately culminating in a full-on attack on wild nature and the defining character of Wilderness: its wildness. We are all bothered when the agencies disregard the ban on motorized equipment by using chainsaws and helicopters rather than non-motorized tools, and Wilderness Watch will do everything we can to prevent it, but this presents a new paradigm in which agencies can throttle Wilderness through endless ecosystem-level manipulation. It is more than a violation of the Wilderness Act, it is an attempt to tame the essence of Wilderness. 🌿

*Mason Parker is Wilderness Watch's Wilderness Defense Director.*



# Defending Wilderness and its wildlife in Congress

Budgets, logging, and bears, oh my!

David Brower, environmentalist and first executive director of the Sierra Club, once said, “Politicians are like weather vanes. Our job is to make the wind blow.” A public gale earlier this summer taught politicians how much folks value Wilderness and other public lands.

Before the House passed its budget bill, it eliminated a provision that would have mandated selling 450,000 acres of federal public land, but Utah’s Senator Lee introduced an amendment to the Senate’s budget bill that proposed to sell 3.3 million acres of public land across the West. The Montana delegation’s unified response—likely from public pressure—succeeded in excluding public land in Montana from the proposal. While the Senate Parliamentarian ultimately judged the sell-off provision to violate the Senate’s budget rules, the Senate could have just amended its own rule and included this provision.

We recognize other provisions in this budget bill will be harmful, but no senator pursued the public land sell-off after such a strong headwind. Public pressure also influenced lawmakers to strip from this bill a proposed mine at the doorstep of the Boundary Waters Canoe Area Wilderness. If you called, wrote, or protested, you made a difference. Thank you.

Public gusts will likely be necessary this fall to redirect those weather vanes. In April, the House passed a bill called the Fix Our Forests Act (H.R. 471)—legislation built upon the deeply flawed premise that we can log and graze our way to vibrant ecosystems and reduce wildfire in a warmer and drier climate (spoiler: we can’t). Two Democrats and two Republicans introduced a similar Senate version (S. 1462). Both versions allow local politicians to participate in designating fireshed management areas on public lands—which may include Wilderness—not subject to the National Environmental Policy Act (NEPA).

Both bills share concerning provisions. They permit 10,000-acre logging projects categorically excluded from NEPA requirements for these fireshed management areas. While those 10,000-acre categorical exclusions exclude

Wilderness, grazing is allowed in Wilderness and both bills expand new grazing to “reduce hazardous fuels” in “fireshed management areas,” which can also include Wilderness. Ecologically, this is an unsound assumption. Grazing increases fire risk because livestock eat more resilient native grasses and spread more flammable non-native plants, like cheatgrass. Both bills severely limit judicial relief from illegal projects. While the House has passed H.R. 471, the Senate Agriculture Committee will likely mark-up the bill when Congress reconvenes this fall. Your pressure will be needed.

Bear-related bills were introduced, and one advanced in July. Rep. Hagerman (R-WY) introduced H.R. 281, which would remove grizzly bears from Endangered Species

Act protection and prohibit judicial review of the delisting. The House Natural Resource Committee held a hearing on July 15, and passed it out of committee by a vote of 20-19. That same day, Rep. Thanedar (D-MI) introduced the “Don’t Feed the Bears Act” (H.R. 4422), which would require the Bureau of Land Management and the U.S. Forest Service to create rules that ban bear baiting



Grizzly bear by Sam Parks

on federal public land within their jurisdictions. Bear baiting, allowed on federal public land in 12 states, is the practice of hunters placing food garbage—doughnuts, dog food, stale bread, etc.—in a pile or barrel to attract bears. When a bear is drawn to the pile, the hunter shoots the bear. In the previous three administrations, regulations from the Department of the Interior that prohibit bear baiting in national wildlife refuges and national preserves in Alaska have been created, repealed, and partially reinstated. H.R. 4422 would also require the National Park Service (NPS) and the U.S. Fish and Wildlife Service (USFWS) to permanently codify each agency’s current regulations so bear baiting is categorized as “feeding wildlife,” and prohibit the practice on public land within their jurisdiction. While an NPS regulation already specifically bans bear baiting in some areas, the USFWS’s regulation makes an exception that permits bear baiting on refuges in Alaska (including in Wilderness), which this bill would codify. 🐾

# Defending Wilderness and its wildlife in the courts

## Federal court vacates U.S. Fish and Wildlife Service wolf finding

**O**n August 5, Federal District Judge Donald Molloy vacated the U.S. Fish and Wildlife Service's (USFWS) 2024 determination that gray wolves in the Western U.S. do not warrant Endangered Species Act (ESA) protections and remanded the matter for a new decision. The ruling in the case brought by Wilderness Watch and allies—represented by Matt Bishop of the Western Environmental Law Center—set aside the “not warranted” finding issued last year and requires the agency to redo its analysis consistent with the ESA.

Judge Molloy agreed with our central arguments. He concluded that, “for the most part,” the challengers were correct and the USFWS failed to use the “best available science.” The opinion identified multiple flaws: the agency discounted lost historical range and failed to analyze whether wolves are endangered or threatened in a “significant portion” of their range; it relied on contested state population models without addressing uncertainty and applying peer-reviewed science; and it insufficiently considered human-caused mortality and the adequacy of existing regulatory mechanisms.

The court was particularly critical of USFWS's confidence in state assurances that wolf killing would stop at certain thresholds, despite acknowledged limitations and lag in the models used to track populations. Agencies must grapple with uncertainty, not assume it away. Judge Molloy held that vacating the 2024 determination was appropriate because it contained “serious and pervasive” errors.

The court therefore vacated the “not warranted” determination and ordered the agency to prepare a new analysis. The order does not relist wolves or immediately change on-the-ground management. Instead, it requires a fresh status review. USFWS must provide an explanation that addresses our—and the court's—concerns, including the treatment of range, the uncertainty of population modeling, and the adequacy of regulatory mechanisms if state policies continue to drive wolf numbers down.

This litigation followed petitions filed in 2021 by Wilderness Watch, Western Watersheds Project, and others seeking to restore protections—either by relisting Northern Rockies wolves or by recognizing and protecting a larger Western population. The agency's 2024 finding rejected those petitions. Judge Molloy's decision requires the agency to reconsider that outcome using the ESA's scientific standards.

Developments in Montana underscore the importance of the court's directives. In August, the Montana Fish and Wildlife Commission adopted regulations that substantially increase wolf killing. For the 2025-26 season, the new rules raise the statewide wolf-kill quota for hunters and

trappers to 452 and add a separate quota of 100 wolves for “controlled removals” by USDA Wildlife Services or private citizens. The rules also allow up to 15 wolves to be killed on a single hunting license and 15 on a trapping license—30 wolves per person. With the state's current population estimate of approximately 1,090 wolves, the combined quotas authorize the killing of 552 wolves—more than



Gray wolves by Sam Parks

half of all wolves in Montana—without even accounting for incidental or illegal kills. These policies illustrate the kind of state-level developments USFWS must consider when determining whether existing mechanisms adequately protect the species.

Several anti-wolf organizations—including Safari Club International, Sportsmen's Alliance Foundation, and Rocky Mountain Elk Foundation—have provided notice of their intent to appeal Judge Molloy's ruling to the Ninth Circuit Court of Appeals.

“This ruling reaffirms the ESA: science first, uncertainty addressed openly, and decisions backed with a transparent, record-based rationale,” said Wilderness Watch staff attorney Dan Brister. “Wolves deserve nothing less. Wilderness Watch and our allies brought this case to uphold these standards and will continue to make sure USFWS's next decision meets the letter and spirit of the law.” 🐾



# RIP NEPA

By Katie Bilodeau

Our leaders are letting the National Environmental Policy Act of 1969 (NEPA) die. But, maybe that's okay. It's time for a National Environmental Protection Act.

By the 1960s, century-accumulated costs of “progress” highlighted the need for new legislation. Rachel Carson had documented the effects of pesticides in *Silent Spring*. American Interstate System construction was bulldozing communities and ecosystems. Ohio's Cuyahoga River caught fire—again. The Senate Committee on Interior and Insular Affairs opined that we were destroying our environment because of an information deficit, and NEPA would correct this.

A “procedural” statute, NEPA doesn't mandate less environmentally destructive outcomes. Instead, its language suggests that the authors believed a government, in cooperation with its people, would make better choices with better information: a policy “to promote efforts which will prevent or eliminate damage to the environment and biosphere ....” Congress would execute this policy by requiring federal agencies to produce detailed statements—environmental impact statements (EISs)—on major federal actions. EISs would disclose foreseeable and adverse environmental impacts that could not be avoided and consider reasonable alternatives.

NEPA is the process that enables Wilderness Watch, and our supporters, to inform various federal agencies how proposed activities would impact Wilderness and whether they comply with the Wilderness Act. This has included stream-poisoning projects, predator-killing decisions, and proposals to reintroduce livestock to places in Wilderness where grazing has been absent for decades. Anyone who has commented on a project the agency is considering has likely done so under NEPA.

Because NEPA is merely procedural, it has suffered a death by 1,000 cuts accumulated over the decades.

All three branches of our government and both political parties bear responsibility for NEPA's demise. In May's judicial bludgeoning, the Supreme Court of the United States (SCOTUS) narrowed the scope of environmental review with blinders, allowing the U.S. Surface Transportation Board to view 88 miles of proposed railway in Utah without considering how the project would enable upstream fossil fuel production and downstream fuel refining by geographically connecting them. The Court reiterated NEPA as a “purely procedural statute that...simply requires the agency to prepare an EIS—in essence, a report.” In condoning compartmentalized environmental analysis over the bigger

picture, SCOTUS summarized how our government regards NEPA nowadays. NEPA is a procedural hurdle on the way to an inevitable project. Sometimes the public can pause it, but only temporarily.

Many agencies in this current administration just transitioned their NEPA regulations into meaningless fluff that disempowers the public, but the accumulation of less flagrant

offenses over the years led to this moment. The environmental assessment (EA)—originally created to ascertain whether significant impacts are possible and thus whether an EIS must proceed—has been inappropriately utilized at ever-broadening scales. For example, the Forest Service has recently conducted an EA for a 2.4 million-acre forestwide burn project—which includes 842,000 acres of Wilderness—in the Sequoia and Sierra national forests in California. The project will have no end and will indiscriminately burn Wilderness, roadless, botanical, and research areas. This is the largest intervention and manipulation project ever proposed for Wilderness. Yet, the EA's draft decision claims this behemoth project will have *no significant environmental impact*.

In another example, when the public told the National Park Service (NPS) in 2018 that it hadn't justified how killing half of the mountain goats on the Olympic Peninsula and helicoptering the other half into the



Mountains goats in the North Cascades by brookpeterson via Flickr

North Cascades—impacting eight Wilderness areas—was the best environmental choice, NPS maintained it neither had to identify nor choose the “environmentally preferred alternative.”

One last example: The Bureau of Land Management (BLM) received 34,783 comments on a proposal to build the Ambler Road in Alaska, which would run adjacent to and negatively impact the Gates of the Arctic Wilderness. BLM counted 30,000 of these opposition comments as “one” because they were “standardized letters” with the same text, minimizing that 30,000 people agreed with the ideas in the letter, enough so to spend their own time submitting a copy. These offenses occur regardless of who heads the executive branch.

Congress also has contributed to the fall of NEPA. In the “Healthy Forests Restoration Act of 2003” (HFRA), Congress allowed the Forest Service to designate “treatment” areas without NEPA review, and created categorical exclusions (CEs) that allow logging in those areas, adding more CEs in decades since. The Council of Environmental Quality initially created CEs to avoid NEPA processes for actions with highly unlikely environmental impacts, enabling agencies to avoid environmental reviews for activities like mowing lawns at Forest Service ranger stations. Congress used HFRA

to transform this administrative feature into legislative loopholes bypassing NEPA, deeming that 3,000 acres of logging (which underwent EISs in the 1990s) has “no environmental impact” simply because lawmakers don’t want to believe it. The “Fix Our Forests Act” bill pending in Congress elevates this to a macabre level, excising the public and NEPA with “fired” designations

within which 10,000-acre CEs are permissible—so logging, burning, and grazing may proceed largely unexamined and unchallenged.

Our government doesn’t want better information. In our upside-down world, if the government spends the time to propose a project with potentially large environmental costs, NEPA and its values are annoying speed bumps to apparently inevitable “progress.” Since NEPA won’t sway decision makers from environmentally destructive decisions, it merely complicates how quickly the government can accomplish projects because of public pushback. It’s time for a National Environmental **Protection** Act, one that mandates substance over pro-

cedure, and reflects values that the NEPA authors thought we had. 🍂

*Katie Bilodeau is Wilderness Watch's Policy Director/ Legislative Analyst.*

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John Muir Wilderness by René Voss



# On the watch

## Wilderness Watch objects to burning the Boundary Waters

In August, Wilderness Watch submitted a formal objection to the Forest Service (FS) over its massive manipulation project that would set fire to as many as 84,000 acres of the Boundary Waters Canoe Area Wilderness (BWCAW) in Minnesota. The misguided *Fernberg Corridor Landscape Management Project* has no place in Wilderness and would violate the mandate of the Wilderness Act to preserve the area's wilderness character. The project's use of helicopters and chainsaws also violates the letter and spirit of the law.

The 1.1-million-acre BWCAW stretches for almost 150 miles along the Canadian border and is one of the most visited Wildernesses.

Wilderness Watch supports restoring fire to its natural role in the BWCAW, and the FS has promised since the 1980s to allow lightning-caused fires to shape the Wilderness. But, the agency has, with very few exceptions, continued to put out nearly all natural wilderness fires over the past 40 years. And while the agency claims that one of the project's purposes is to allow natural fires to burn in the BWCAW, the project's final environmental assessment omits any analysis about whether, when, or how the agency will allow natural fires to burn.

From a wilderness perspective, manager-ignited fires are a prime example of humans imposing their will on Wilderness to try to create desired conditions rather than allowing nature to shape Wilderness. Manager-ignited fires can have very different effects on a wilderness ecosystem compared with natural, lightning-caused fires. The ignition location and forest types that managers burn are often different, and the fire type can be very different, too.

Instead of planning to burn tens of thousands of acres in the BWCAW, the FS should finally allow natural lightning-caused fires to play their role in the Wilderness. Our objection calls for the agency to withdraw its Draft Decision Notice and Finding of No Significant Impact and prepare a full environmental impact statement. 🌿

## Forest Service should not increase visitor fees for the Boundary Waters

Wilderness Watch is pushing back against the Forest Service's (FS) proposal to more than double visitor fees for the Boundary Waters Canoe Area Wilderness (BWCAW) in Minnesota, one of the most visited in the National Wilderness Preservation System.

The FS has charged a visitor fee there since 1998 and last raised the fee in 2008. But the FS now proposes to drastically increase the per-trip youth fee from \$8 to \$20 and the per-trip adult fee from \$16 to \$40.

While Wilderness Watch supports quotas and permit systems to reduce impacts and protect wildlife and solitude for visitors, the proposed 150 percent fee increase for the BWCAW will both add to the commodification of the Wilderness and make it harder for lower-income individuals and families

to experience the BWCAW. Access to Wilderness should be available to everyone, not just those who can afford to pay.

The FS and Congress have also been starving the wilderness program for years. While nearly 20 percent of the National Forest System is Wilderness, the budget for Wilderness is not even one percent of the FS's budget. The agency shouldn't be charging wilderness visitors exorbitant fees so it can spend taxpayer money elsewhere. It needs to fund its wilderness program at a reasonable level out of its current budget.

This new fee increase proposal also comes on the heels of the Trump administration's extreme staffing cuts at the FS—including wilderness rangers—with about 100 staffers cut on just the Superior National Forest alone (which the BWCAW is part of).

The public shouldn't be asked to backfill those severe budget and staff cuts that affect the BWCAW. The Forest Service should seek to restore staffing and budgets outside of asking the public to make up for the administration's cuts. Public lands belong to all of us and we should not be asked to pay more simply to visit Wilderness. 🌿



Boundary Waters Canoe Area Wilderness by Tony Webster via Flickr



# On the watch

## A better plan needed to remove microwave reflector in the Roaring River Wilderness

**W**ilderness Watch commends the Forest Service (FS) for its goal of restoring part of the Roaring River Wilderness in Oregon by removing a microwave reflector, though we're concerned about the agency's proposal to complete this. The reflector was installed in 1972, and abandoned after its permit expired in 2002. The Wilderness was designated in 2009.

The 36,548-acre Roaring River Wilderness is bordered by the Clackamas and Salmon-Huckleberry Wilderness areas. It's home to native wildlife like salmon and steelhead, black bears, mountain lions, mule deer, elk, and northern spotted owls.

Earlier this year, the FS skirted environmental analysis and limited public participation when it issued a categorical exclusion (CE) for the project. The proposed use of motorized tools and up to 16 helicopter landings in the Wilderness requires analysis through an environmental assessment (EA).

The microwave reflector is less than 1,000 feet from the nearest road, which further diminishes the perceived need for motorized tools and helicopter use within the Wilderness. The agency should explore wilderness-compatible, non-motorized options, such as dismantling and moving the components to the road via human power or with pack stock, to be hauled away from there with a motor vehicle.

As noted in our comments, the agency has failed to disclose relevant information such as: how the reflector was constructed, what the largest and heaviest components are, and why the components can or can't be taken apart or otherwise reduced to a packable size. The agency should explain why sledgehammers/chisels/wedges aren't adequate to break up the concrete pillars, and why using traditional tools, like a star drill and explosives, wouldn't suffice instead of a motorized jackhammer.

Helicopters are only allowed in Wilderness under the rarest of circumstances. This is far from the case with this project. In our comment letter, we described the many impacts helicopters can inflict on Wilderness, including disturbance to native wildlife and their habitat. We also noted that the

project's specific impacts to fish and wildlife are unknown due to a lack of analysis by the agency.

A CE is not appropriate for this project. The FS needs to complete an EA that not only includes a detailed analysis of the potential impacts of helicopter use and motorized tools, but also explores alternatives that respect the Wilderness. An EA would also facilitate meaningful public involvement. 🐾

## Helicopter roundup threatens Goshute Canyon and Becky Peak Wildernesses

**T**he Bureau of Land Management (BLM) is proposing to potentially land helicopters in the Goshute Canyon and Becky Peak Wildernesses in Nevada to remove wild horses as part of its *Antelope-Triple B Gather* project. Wilderness Watch appreciates that the agency is seeking to remedy degradation caused by wild horses, but it must respect the Wilderness with whatever actions it takes, and should consider less traumatic/more humane ways to deal with the wild horse population.

The Goshute Canyon and Becky Peak Wildernesses are located near each other, though not contiguous. Goshute Canyon Wilderness, with its limestone cliffs and rugged canyons, is within the Cherry Creek Mountains, while Becky Peak Wilderness, with its 9,859-foot namesake peak, among other high peaks, lies within the Schell Creek Range.

In our comments on the environmental assessment (EA), we noted that the Goshute Canyon and Becky Peak Wildernesses occupy a very small fraction of the project area. The EA fails to make the case that the proposed action is needed inside the Wildernesses, largely because the analysis is not site-specific. The EA also fails to provide information on how many horses live in the Wildernesses, either permanently or those that only pass through, making it difficult to make an informed decision.

Other problems with the analysis in the plan include: it downplays and is missing details on the impacts to Wilderness, it's based on a misreading of the law, it lacks a minimum requirements analysis and a map of areas potentially impacted by helicopter overflights, it allows for helicopter landings in "case of emergency," and it will likely go on in perpetuity in the Wilderness. We're awaiting a decision. 🐾



Microwave reflector, Roaring River Wilderness by USFS

# On the watch

## Foolhardy construction project proposed in the Mount Timpanogos Wilderness

The Forest Service (FS) is proposing to replace a useless, dilapidated, sheet metal Quonset hut in the Mount Timpanogos Wilderness in Utah. The hut was damaged by snow during the winter of 2021-2022. While the FS has sold this as updating the old structure, the agency would construct an entirely new building with a new concrete slab in the Wilderness.

The plan includes invading the Wilderness with an undisclosed number of helicopter flights and landings, and using jackhammers, cement mixers, and other motorized tools.

The FS absurdly claims that rebuilding the structure would improve the area's wilderness character. Wilderness Watch is working to convince the agency to allow the hut to fade with time, or remove its collapsed remnants using wilderness-compatible means. The FS built the hut without motorized equipment, falsifying its claim that it can't dismantle (or repair) it using traditional means.

The hut was built in 1960, prior to the area's 1984 wilderness designation, to provide shelter and restrooms for an annual public group hike first organized in 1912. Excessive impacts during the 1969 event, when 8,000 people attempted to reach Mount Timpanogos' 11,753-foot summit, caused the FS to ask hike organizers to end the event. The group hike ended and the hut deteriorated over the decades.

The FS's first responsibility is to protect the area's wild character. The agency's own wilderness policy recognizes that a structure is not needed for visitor use, and states that visitors must be prepared to face "inherent risks of adverse weather conditions, isolation, physical hazards, and lack of rapid communications...."

In August, the agency preliminarily approved the plan to build the new hut, and Wilderness Watch responded with a formal objection. We'll keep everyone updated. 🍄

## Commercial outfitter permits renewed in the Bob Marshall Wilderness Complex

Despite the concerns raised by Wilderness Watch, our members and supporters, and other conservation groups, the Forest Service recently renewed 62 existing outfitter permits in the Bob Marshall, Scapegoat, and Great Bear Wildernesses in Montana without any environmental analysis or disclosure of these commercial operations' impacts.

These three Wildernesses comprise the 1.5-million-acre Bob Marshall Wilderness Complex. The "Bob," as it's known, helps protect one of the last great expanses of biodiversity in North America, with outstanding habitat for grizzly bears,

Canada lynx, wolverines, elk, gray wolves, moose, mountain lions, mountain goats, bighorn sheep, and many more species.

The Bob has a long history of outfitting and guiding, and some outfitters have been instrumental in protecting the area. But, as we pointed out in our scoping comments—which provided the only opportunity for public comment—impacts from outfitting and camps are often glossed over or overlooked. This includes

wilderness trails so heavily used by pack animals that they more resemble roads than foot or horse trails, and many outfitter campsites more suited to front country "glamping" than wilderness travel. These impacts are compounded by the extraordinarily large party sizes (up to 35 pack animals) allowed in the Wildernesses. And, we urged the Forest Service to consider the impacts of these commercial hunting operations on the wolves, bears, and mountain lions living in the Bob, especially in light of Montana's war on predators.

Given the growing impacts from all recreation use in the Bob, the Forest Service needed to do a thorough environmental analysis—with public input—before issuing new outfitter-guide permits. Unfortunately, the agency's use of a categorical exclusion completely sidestepped the more rigorous environmental analysis and public input this important area deserves. We're considering our next steps. 🍄



Bob Marshall Wilderness by Howie Wolke



# On the watch

## Cattle once again grazing a long-closed area of the Superstition Wilderness

This spring, Wilderness Watch was alarmed to learn that the Forest Service recently and quietly allowed a long-vacant grazing allotment in the Superstition Wilderness in Arizona to once again be grazed by domestic cattle. This Wilderness lies mostly within the Sonoran Desert, with semidesert grassland and chaparral in its higher elevations. Not only will this fragile desert Wilderness once again be harmed by cattle grazing, but there appears to have been no public notice or opportunity to comment on the reopening of this grazing allotment known as the Reavis-Tortilla.

This past June, Wilderness Watch and Western Watersheds Project sent a letter to the supervisor of the Tonto National Forest to express our serious concerns and to request more information on this grazing allotment, including: when cattle were allowed back on the allotment; the number of cattle; official documentation on the grazing permit and the decision to resume grazing; when the allotment was last assessed for past damage; and whether a public process has or will be conducted.

The agency should have conducted a site-specific National Environmental Policy Act (NEPA) analysis since cattle

have not grazed this allotment for decades, and reauthorizing grazing requires the agency to analyze potential impacts to the Wilderness. Such analysis should account for the ecological recovery over the years since cattle last grazed and should provide a current ecological baseline. If the Forest Service believes a NEPA review and/or a public process isn't required, it must explain why.



Superstition Wilderness by Deborah Lee Soltesz via Flickr

Our letter also expressed concern that the agency may be allowing private ranchers to use helicopters or other motorized equipment within the Wilderness to manage the cattle.

Reintroducing cattle into areas not grazed in a long time within the Superstition Wilderness will likely cause negative impacts to soil and water quality, riparian function, and native plant and wildlife populations

that depend on intact desert ecosystems. These impacts should have been rigorously analyzed and publicly vetted before grazing was reintroduced into this part of the Superstition Wilderness—or any Wilderness, for that matter.

As this newsletter goes to press, we're awaiting a response from the Forest Service. 🙏

## You Sustain Our Work

Please consider making a special donation to help us defend Wilderness and the Wilderness Act.





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## We are leading the way because of your support

By Brett Haverstick

**T**hanks to your great support, our staff has organized and participated in a number of strategic gatherings around the country this year.

We worked with allies and grizzly bear advocates to host the Third Annual Great Bear Gathering at the University of Montana's Lubrecht Experimental Forest. Close to 40 people attended, including staff from 17 conservation groups. The gathering's main goal was to create a plan to oppose efforts to delist grizzly bears from the Endangered Species Act, and to introduce federal legislation to permanently protect grizzlies, similar to the Bald and Golden Eagle Protection Act.

Staff attended the Healthy Public Lands Conference in Salt Lake City.

Activists converged to discuss the numerous harms and ecological damage created by livestock grazing on federal public lands, including in Wilderness. Livestock are authorized to graze on 25 percent of the 52 million acres of Wilderness in the Lower 48. Wilderness Watch is a co-founder of the Healthy Public Lands Project, a coalition working to reduce the harmful effects of livestock grazing on public lands and native wildlife.

Our Legislative Director and Policy Analyst, Katie Bilodeau, gave a Wilderness 101 presentation at the 33rd Annual Heartwood Forest Council in Pennsylvania. Attendees learned what Wilderness is, why it's important, its key legal protections, and the current challenges it faces. In a plenary session, Katie gave an overview of the Northern Rockies Ecosystem Protection Act, which would designate Wilderness across five states and was recently re-introduced to this Congress, and long-time forest activist Steven Krichbaum presented his vision for a similar bill for the Appalachian region.



Great Bear Gathering by Adam Rissien

Our Wilderness Defense Director, Mason Parker, joined staff from the John Muir Project and others for a field trip to the Sequoia-Kings Canyon Wilderness in California. Participants documented the natural regeneration of sequoia groves following a wildland fire in 2021. The burned areas are lush with

sequoia seedlings and a rich array of flora. This runs counter to the National Park Service's claims that the area was too burned to recover and required management and manipulation of the Wilderness by planting sequoia seedlings.

Whether it's being in the courtroom, the halls of Congress, or working with like-minded groups and activists to defend Wilderness and its wildlife, **THANK YOU** for making this possible! 🐾