

## Montana fish poisoning plan dead in the water: A whale sized legal win for Wilderness

By Dana Johnson

Over the years, Wilderness Watch has noted a slow creep in Wilderness Act litigation where courts are increasingly reluctant to dive into the central purpose of the Wilderness Act—wilderness preservation—instead treating it like multiple use statutes where agencies weigh competing land uses and have discretion in deciding the top value. The result has been a tendency to decide cases on procedural grounds rather than deciding whether an action is—at its core—fundamentally at odds with the purpose of the Wilderness Act.

When the U.S. Forest Service authorized the *Buffalo Creek Yellowstone Cutthroat Trout Conservation Project* in the Absaroka-Beartooth Wilderness in Montana—a project aimed at killing off previously “stocked” fish in a naturally fishless watershed flowing into Yellowstone National Park and replacing them with a different species of stocked fish—we filed suit focusing intentionally on the heart of the Wilderness Act: its untrammelled mandate. Our suit teed up an important question: Can state and federal agencies elevate their desired conditions above the Wilderness Act’s untrammelled mandate? This question often underlies our legal challenges, but courts increasingly focus on the Wilderness Act’s express prohibitions (motorized and mechanized

uses, aircraft landings, structures, etc.) in a manner that avoids addressing the project’s underlying compatibility with wilderness preservation. But, could a project that is unequivocally a trammeling effort—one aimed at fundamentally altering species and habitat composition—really be permissible under the Wilderness Act? (Note: We’re not fans of using the economic language of grocery stores to discuss living beings, but for clarity, we’ll use the agency’s term “stocking” in this article.)



Buffalo Creek by Brett French

Here, the project had two components: 1) killing off the existing fish using rotenone—a nonselective pesticide/piscicide—via a stunning array of motorized means, and 2) restocking a different fish species without motorized assistance. The Forest Service argued the latter was outside of its scope of oversight

because it would be a state action and would not involve any prohibited means of implementation.

The Buffalo Creek Project is nearly identical to projects proposed by state agencies in other Wildernesses across the West—eradicate previously stocked fish above a natural migration barrier and restock the waters with a different fish species. The rationales: supporting angler preferences, creating climate refugia, establishing pools of

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### *In This Issue:*



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*Keeping Wilderness Wild*

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# In troubled times, Wilderness is the way



Listening to the news lately is truly heartbreaking. A whirlwind of actions and events are changing the world so quickly it is difficult to keep track and make sense of it all. In this time of confusion and rapid change, nothing is more vital for the human spirit than wild nature. And, in that regard, nothing is more important to preserve and protect the wild than Wilderness.

When my head starts spinning from too much too fast, I wander into the wild. In Wilderness, I can regain my center and hope. Sometimes that means finding a quiet place to listen to birdsong and watch the trees wave in the wind.

Sometimes it means walking uphill as fast as I can until I am out of air and catching the next breath is all that matters. Regardless of what I do, it always means experiencing a place so much larger than myself that it puts things in perspective.

One of the most astounding things about Wilderness is the silence. The sounds of civilization are so ingrained that we stop noticing the constant noise, until it disappears. In Wilderness, birds chirp and the wind whispers, but when there is a lull, it is stunning. The stillness is profound; one cannot help but feel tranquil. That alone makes it worth the fight.

In the mayhem of current events, the systematic attack on Wilderness and our other public lands continues. The National Environmental Policy Act has been stripped of meaningful public involvement and robust analysis. The Endangered Species Act's ability to protect listed species and their habitat is under siege, and the Roadless Rule could become a thing of the past. In all this, we can be grateful that the Wilderness Act is holding strong thanks to the diligence and dedication of the Wilderness Watch staff and board—and the actions and generous support of our members.

Wilderness Watch is ever vigilant, whether it's in the courts, Congress, or holding agency feet to the fire when it comes to preserving wilderness quality and doing things the wilderness way.

Here are just a few issues currently in our sights: The National Park Service's proposed Visitor Use Management Plan for Cumberland Island National Seashore in Georgia, including the Cumberland Island Wilderness, would essentially develop this unique barrier island as a tourist attraction, degrading the wild, primitive experience it now offers. A logging project in Montana threatens areas bordering the Great Bear Wilderness. Wilderness Watch recently learned the Forest Service is considering nationwide use of chainsaws in Wilderness. And threatened wolverines still lack protected critical habitat, including within Wilderness, because of agency foot-dragging. The list goes on.

To preserve wild nature, the Wilderness Act must remain strong. Humans need Wilderness to reconnect and recharge. Wilderness is blind to how humans define themselves. There is no judgment or special treatment, only acceptance. Spend a few days in Wilderness, or better yet, longer if you can. Every moment you spend there will bring you solace. If you cannot visit Wilderness, get outside whenever possible to conjure that connection to nature. Sometimes just knowing Wilderness exists, that pure waters cascade down rocky creeks and that a host of wildlife thrive, is enough to believe in a better tomorrow.

Wilderness Watch is working tirelessly to defend the tenets of the Wilderness Act and remind agencies of their mandate to preserve wilderness quality. Thank you for supporting Wilderness Watch, for paying attention, for taking action, and for caring about the wild. 🐾

*Michele Dieterich is the Secretary of Wilderness Watch's Board of Directors. She has spent the last decade working to protect wildlife habitat, old growth, and the solace that Wilderness and intact forests provide.*

genetically pure fish, and resisting already prolific hybridization throughout watersheds. As in the Buffalo Creek case, the Forest Service generally claims that wilderness character will be improved by removing a non-native species and restocking the waters with a species that, while not native to the waters in question, are native to the broader region. In reality, the projects entail removing one introduced species and replacing it with another—not for wilderness protection, but for states’ fish management goals.

The eradication component of the Buffalo Creek project entailed intensive motorized intrusions and other prohibited activities—a massive amount rarely seen in the National Wilderness Preservation System—to poison 46 miles of streams and 30 acres of lakes and wetlands (including aerial spraying rotenone). The Forest Service approved transporting project personnel by helicopter, erecting a radio repeater, helicopter landings for delivery of over 18,000 pounds of gear and rotenone, and establishment of three remote field camps. In total, the Forest Service approved up to 60 days of motorized use and 81 aircraft landings in the Wilderness.

Our case was assigned to a Magistrate Judge in Montana who would write up findings and recommendations for the District Court Judge to adopt. As feared, the Magistrate avoided addressing the restocking component of the project altogether, and worse, issued an opinion drastically increasing agency deference and nullifying the Wilderness Act’s substantive protections. The opinion set a new “either/or” legal standard where agencies could make project decisions *either* in furtherance of wilderness preservation *or* in pursuit of various public uses of wilderness (recreational, scenic, scientific, educational, conservation, and historical uses). You can imagine the parade of horrors marching off the page.

We asked the District Court Judge to reject the Magistrate’s recommendation and correct the course of wilderness litigation. In one of the most important opinions for wilderness protection in decades, District Court Judge Donald Molloy took a deep dive into the heart of the Wilderness Act and addressed previously elusive issues head-on. Judge Molloy rejected the Magistrate’s either/or standard and made clear that the “Wilderness Act mandates the managing agency ‘preserve wilderness character,’” and that “[p]reservation of wilderness is the paramount obligation.” The Judge further held that “the conservation of Yellowstone cutthroat trout in Buffalo Creek is not a valid conservation purpose under the Act” because the wilderness watershed “was historically fishless, so the wilderness neither depended on Yellowstone cutthroat trout for ecological balance nor contributed them to the watershed as a whole.”

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## In one of the most important opinions for wilderness protection in decades, District Court Judge Donald Molloy took a deep dive into the heart of the Wilderness Act.

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And, in an incredibly important ruling for Wilderness, the Judge held that the Forest Service could not extract itself from its statutory duty to preserve Wilderness by severing the State’s fish poisoning and stocking from its oversight. Instead, the Judge held that “[t]he Forest Service was required to consider whether the management actions of rotenone poisoning and fish stocking—as opposed to just their means of implementation—would preserve the wilderness character in the area prior to approving the project.” The Judge also made clear that the Forest Service cannot defer to the states in these matters, noting that “actions that occur in the wilderness but are not executed

by federal land managers still impact the wilderness character of an area,” and “state powers over wildlife ‘exists only in so far as their exercise may not be incompatible with’ [federal law].” Where the state’s actions degrade wilderness character, the Forest Service’s statutory duty to preserve Wilderness is triggered.

Lastly, addressing the Forest Service’s argument that removing a non-native fish species and replacing it with a “more native” fish species would result in a net-gain for wilderness character, the Judge quoted the agency’s own guidance explaining that there is a “thumb on the scale in favor of maintaining the [u]ntrammelled [q]uality” of Wilderness. The guise of “naturalness” “should not be used to recreate historical conditions from an arbitrary point in time ..., target a subject set of desired conditions ..., or otherwise maintain unchanging ecological conditions.”

The Judge concluded,

Unlike other resource management statutes, the Wilderness Act is not merely a procedural checklist or a delegation of discretion to a managing agency to weigh competing uses....

To the contrary, the Act dictates the outcome: wilderness areas ‘shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas [and] the preservation of wilderness character....’ A project that diminishes wilderness character on almost every level cannot meet that requirement.

The Forest Service has not made a final decision on whether it will pursue an appeal of the opinion. If it does, Wilderness Watch will vigorously defend this whale sized win for Wilderness at the appellate court. 🐳

*Dana Johnson is the Policy Director of Wilderness Watch.*

# Defending Wilderness in Congress

In the last newsletter, Wilderness Watch discussed the expansion of the Congressional Review Act (CRA) and how some lawmakers have used it as a tool to meddle in public land management. Specifically, we discussed the recent CRA resolution that enables construction of the 211-mile Ambler Mining Road through some of the wildest habitat remaining in Alaska, and could only postulate other ways lawmakers would try to wield this law.

On January 12, Rep. Pete Stauber (R-MN) introduced H.J. Res. 140, a CRA resolution to strike down a public land order that imposed a 20-year moratorium on mining public lands near the Boundary Waters Canoe Area Wilderness (BWCAW) in northern Minnesota. The CRA resolution would permanently reverse that protection and allow leasing public lands for mining and geothermal development to benefit Chilean mining giant Antofagasta, which wants to mine copper-nickel next to the BWCAW. Copper mining is notorious for polluting groundwater and watersheds. On January 21, the resolution to strip protections next to the BWCAW passed the House by six votes.

As this newsletter goes to print in mid-March, the Senate is expected to vote on H.J. Res. 140 imminently. We would like to thank thousands of our members and supporters for contacting their lawmakers. Constituent pressure can make lawmakers think twice about their vote, or even delay what lawmakers expected to be a fast vote while they reassess whether they have enough votes.

In early January, the week before the Boundary Waters Congressional Review Act was introduced to Congress, Wilderness Watch spent four days on Capitol Hill. Katie Bilodeau, our legislative director, had 25 meetings that first week Congress was in session. She met with staffers on the Senate's Energy and Natural Resources Committee and the Environment and Public Works Committee, as well as staffers who work for Congressional members in either the House or Senate in the following states: California, Colorado, Connecticut, Hawaii, Illinois, Indiana, Louisiana, Massachusetts, Michigan, New Jersey, New Hampshire, New Mexico, New York, Oregon, Nevada, Rhode Island,

Vermont, and Washington. Additionally, Katie met with staffers who work for the representatives from Puerto Rico and the District of Columbia. While these delegates cannot vote on legislation, they can sponsor legislation. They also serve and can vote on committees, and the D.C. and Puerto Rico delegates are on oversight committees. (Fun fact: Did you know we have designated Wilderness in Puerto Rico?)

The topics of each meeting were as varied as the legislators, guided by what committees they serve on, such as agriculture, natural resources, or oversight committees; what bills they have sponsored; or a combination of these. While each visit was unique, Wilderness Watch did have some broader

themes. One important theme was to inform congressional members about the incredible extent to which all U.S. taxpayers subsidize the livestock grazing program on federal public lands in the West. Grazing negatively impacts native wildlife and plants, soils, and clean water—including across millions of acres of Wilderness where it has been grandfathered in as a nonconforming use. Additionally, we asked for oversight over land manage-

ment agencies' lack of compliance with the National Environmental Policy Act, where our staff has noticed a significant uptick in instances where these agencies circumvent public participation to more speedily approve decisions that favor resource extraction and private profit over Wilderness and wildlife protection. We discussed how nonconforming uses in wilderness bills threaten the National Wilderness Preservation System, and encouraged designating Wilderness without these damaging exceptions. And in some cases, we just introduced Wilderness Watch and offered our expertise for wilderness-related issues.

While there is a lot happening on the national stage, we left D.C. optimistic that there are still folks there—staffers and legislators alike—who care deeply about Wilderness and other public lands. We will continue to build support for Wilderness that transcends party politics and is aligned with the values that a bipartisan Congress overwhelmingly espoused in the 1964 Wilderness Act. 🐾



Boundary Waters Canoe Area Wilderness by brnptmn via Flickr

# Defending Wilderness in the courts

Across the country, Wilderness Watch is using the law to uphold wilderness protections—from endangered species habitat to wild landscapes threatened by commercialization and industrialization. Here are three cases that show how that work is unfolding.

## Wolverines and wild habitat

Wolverines are among the most wilderness-dependent mammals in the lower 48 states, persisting only in remote, high-elevation landscapes with deep snow and minimal human disturbance. Many of these strongholds overlap with designated Wilderness across the western United States—where natural processes still dominate.

Although the U.S. Fish and Wildlife Service listed the wolverine under the Endangered Species Act in 2023, the agency has failed to complete the next required step: identifying and protecting habitat essential for the species' recovery. Without designated critical habitat, key landscapes remain vulnerable to fragmentation.

Wilderness Watch, represented by the Western Environmental Law Center, has teamed up with other conservation groups in federal court to ensure the government follows through on its legal obligations. The immediate goal is to obtain a court-ordered deadline requiring the agency to designate critical habitat. Once that process begins, we will advocate for protections grounded in best available science.

Protecting wolverine habitat also protects connected wildlands, including Wilderness, essential to many other species. The case is a reminder that species' protections only work when implemented in practice, not just promised on paper.

## Boundary Waters: Commercial motorized towboats

The Boundary Waters Canoe Area Wilderness is one of the most ecologically intact freshwater ecosystems in North America—a vast network of lakes, rivers, and forests supporting species dependent on quiet, connected wildlands. It is also a place where people seek the solitude and natural silence promised by Wilderness.

Our lawsuit challenges the growth of commercial motorized towboat services within the Wilderness. The Wilderness Act

allows commercial services only to the extent necessary for wilderness purposes, yet expanding towboat operations are transforming parts of the Boundary Waters Wilderness into commercialized, motorized travel corridors.

Although the district court ruled for the Forest Service, finding that older planning decisions satisfied legal requirements under a deferential standard of review, we believe that interpretation to be incorrect.

With the support of local counsel Rachel Kitze Collins of Lockridge Grindal Nauen PLLP, we have appealed to the U.S. Court of Appeals for the Eighth Circuit.

## Arctic Refuge: Defending one of the last great wild landscapes

The Arctic National Wildlife Refuge is one of the largest intact ecosystems left in North America—a vast sweep of tundra, mountains, and coastal plains that supports caribou, polar bears, muskox, Dall sheep, migratory birds, and other wildlife dependent on an unbroken landscape. For decades, the Arctic Refuge has represented the idea that some places are too important to industrialize.



Wolverine by Howie Wolke

Wilderness Watch's involvement in this litigation spans years and changing federal administrations. In 2020, we challenged a leasing program that opened the Refuge's 1.56 million-acre Coastal Plain to oil and gas development. The lawsuit was paused while agencies reconsidered the program under a subsequent administration, but when earlier leasing policies were reinstated and suspended leases revived, our coalition returned to court with updated claims.

We are participating as one of several plaintiffs represented by lead counsel, Trustees for Alaska. Together, we're arguing that agencies failed to fully evaluate impacts to wilderness, wildlife, Indigenous communities, and the ecological integrity of the Refuge.

## Conclusion

These cases differ in place and scale, but they share a common thread: wilderness protections endure only when consistently defended. Through litigation, Wilderness Watch continues working to uphold the legal promises made to future generations with passage of the 1964 Wilderness Act. 🐾

# “They will not replace me if I leave”

## A wilderness ranger’s 2025 season

*In February 2025, the Trump administration fired approximately 4,400 U.S. Forest Service and National Park Service employees, including wilderness rangers and trail crew members. Some wilderness rangers shared with Wilderness Watch their stories and concerns about impacts to Wilderness.*

*The following details one wilderness ranger’s 2025 season. Wilderness Watch has authenticated the wilderness ranger’s identity, but we’re publishing this story anonymously to protect their identity and help prevent potential repercussions. The image in this story is unrelated to where the wilderness ranger works.*

*In February 2026, the Forest Service announced it would hire up to 2,000 seasonal positions for this summer, but it remains to be seen how many of those positions will be geared toward wilderness protection versus resource extraction and recreation.*

I’m a quarter mile into my hike when the tears start to fall. I can’t control them these days. I’m at work, wearing my uniform, and I do not want to be crying right now. I briefly contemplate walking into the bushes and breaking down for a few minutes. I pull my sunglasses over my eyes and keep walking, wiping away the tears as they continue to fall. This is my new normal. Anxiety, sadness, and anger are my constant companions.

I am a wilderness ranger. I work for the U.S. Forest Service. I do not work for the National Park Service. I am not a park ranger.

This is probably a familiar tale by now. I was fired in what is known by federal employees as the Valentine’s Day Massacre. Thousands of us were fired by the Trump administration under false and sweeping claims of poor performance. After weeks of stress and frustration, a court ruled in favor of our reinstatement. I returned to my job. I was expecting a summer of hard work and camaraderie with my coworkers. We had all been through something harrowing together, but now we were stronger and more united. Declarations of “hold the line” gave me hope.

### May 2025: Staffing

Shortly after I returned to work, “DOGE” rolled out the deferred resignation program, or “DRP.” Agree to resign now, and get paid to do nothing until the end of September. Public lands employees often live paycheck to paycheck. Housing and health insurance are connected to seasonal jobs. This is not a group of people who can afford to ride out financial uncertainty. When the battered Forest Service staff was offered a stable-looking exit ramp, so many people took it. This was the real blow to the agency.

I do not judge my fellow Forest Service employees for leaving, but I do miss them.

### July 2025: Passing the torch

I sit beside my mentor on the shore of a large lake. To start the morning admiring the reflection of the peaks is a tradition of this particular hitch. My mentor took the DRP and will retire at the end of it. They are not supposed to be here, but I appreciate they have come along to help me out. My mentor points to various spots around the valley and shares quick stories of their adventures. Stewarding this Wilderness has been their entire career. I have wanted to follow in their footsteps for some time, but not like this. This will be their

last hitch as a Forest Service employee. We part ways, and my mentor heads toward the trailhead. The torch has been passed. I walk slowly down shore and deeper into the Wilderness. I am the only one left now. Tears fall, and I feel the weight of everything, heavier than my loaded backpack.

### July 2025: Public contacts

I have just finished a strenuous and waterless day on a trail that climbed and descended relentlessly. Perhaps this was an ambitious early season hitch, as I don’t have my trail legs yet. After setting up my tent, I grab my shovel and trash bag and start my rounds. Some micro-trash, but no fire rings. I notice a tent set up on the vegetation right by the water, despite the empty campsites all around. I approach and ease into a conversation about Leave-No-Trace and camping on durable surfaces. They agree to go check out the other sites.

In the morning the tent hasn’t moved. I am irritated now. I gave them all the information, and they still chose to cause this damage? I mentally prepare myself to be firm. I hate confrontation.

“There were a lot of other good campsites last night. Why did you stay on the vegetation?”

“Well, we could see another tent from those other sites.”

We are at a popular lake, on a weekend, just a few miles from a trailhead, in one of the busiest Wilderness areas in the region. I was the other tent they could see. The camper continues to list excuses. I tell them again to move their stuff. Finally, the second camper apologizes and agrees to move. It is obvious the first camper doesn’t agree and will do the same thing again.

This was once a place one could expect the level of solitude they were seeking. While we should all mourn that loss, we must also calibrate our behaviors to the current situation. A person’s experience is not more important than the longevity of these places.

### July 2025: Volunteers and partners

“He yelled at you in the parking lot?”

I am standing with the lead of a volunteer trail crew as they explain to me that the lead from a different organization accosted them in the parking lot. The yelling crew lead is apparently mad that this crew is working on the same trail. He is worried they will “take all the crosscut work.”

The Forest Service higher-ups have been preaching that we need to lean on our non-profit partners, and I am trying.

The yelling crew lead has accused me of repeatedly depriving his crew of logs to crosscut. I do not have the energy for this again. The Forest Service trail crews are gone. After logs are cut, there are hundreds of trail drains to clean and tons of brush to trim back. There is so much trail maintenance that fighting over it is almost comical.

Later, I find out the yelling crew lead canceled a trip on a 20-mile stretch of trail deep in the Wilderness. Now the maintenance falls on me. A few years ago, an avalanche brought down 300 logs and took two seasons to clear. Two years ago, a complex pile of massive logs turned into a two-day project for a crew of six. When trails aren't maintained, trails become wider as visitors avoid downed trees and erosion increases. Vegetation gets trampled as users climb around obstacles.

Many dedicated volunteers and partner organizations work alongside the Forest Service staff. Every one of those partnerships requires attention, and coordinating their work is a full-time job. I am already trying to cover the work of several full-time jobs.

Volunteerism ebbs and flows. People are enraged by what is happening to their public lands and want to help right now. If volunteers can step up for now and complete some of the work previously done by Forest Service crews, the trails will limp along. When the situation is no longer newsworthy, or as times get harder for everybody, who will do the work? Some tasks, like dealing with human waste, are more than most volunteers want to take on.

### August 2025: Toilets

I started the day at a remote alpine lake. There, I plucked 16 cigarette butts out of a fire ring, dismantled four other fire rings, and packed out a substantial bag of trash. The only way to the lake is a scramble across a rocky slope. A 1990s map classifies the area as "pristine" and "trail-less." The fragile alpine environment is closed to campfires.

It is now 3:45pm as I walk towards a larger lake and into the camp frequented by long-distance backpackers. I see toilet paper everywhere as I follow the signs to the pit toilet. The smell hits me before I arrive. I tentatively open the lid to see human waste and toilet paper overflowing from the ground. The mess is halfway up the wooden box that serves as a seat. I curse and look longingly at the ridge far above me where my tent sits. I read all the trip reports, and no one mentioned this toilet was full! If this lake was more accessible to a trailhead

and not nestled in a remote valley, the day hikers and overnight backpackers would have complained about this. While it is next to a popular trail, the long-distance backpackers float on to their next destination and seem to have forgotten about the abhorrent toilet by the time they next pass cell service. More likely they never made it to the toilet, judging by the toilet paper lining the trail on the way in.

It is time to dig a new pit toilet. I pull on my nitrile gloves and carefully pull the wooden seat off the heaping pile of waste. I work quickly and try not to gag. I upend the seat in the sun, hoping that will do something about the disgusting state of the lower boards.



Maroon Bells-Snowmass Wilderness by Kyle Alcorn

I look for an opening away from any trees to encounter fewer roots. I grab my shovel and sink the blade into the ground. The clink of metal on rock is not the sound I was hoping to hear. I try again a few inches away and find success. I keep digging for the next hour, throwing shovelfuls of dirt atop the heaping, stinking pile a few paces away. I loosen small rocks and lay on my stomach to remove them from the ground. When the old toilet hole is fully bur-

ied, the smell becomes bearable again. Hopefully the human waste will break down and the ground above it will flatten out over time. This is the third toilet I have dug this year, and I know I have two more that will fill before the season ends.

In a normal year, multiple wilderness rangers would have been here way before August. I would dig one or two toilets and share the workload with other rangers. Will I ever know a year like that again? I'm told, "don't do more with less," but I can't just let pit toilets overflow.

I reinstall the toilet seat on the new hole and have stabbed as much loose toilet paper as I can with a long stick. I begin to climb the dozens of switchbacks back to camp. Dispatch will probably call me on the radio soon since I was supposed to check out a few minutes ago, but I am still more than an hour from my camp.

A backpacker appears and I start my Leave-No-Trace spiel. I put extra emphasis on packing out toilet paper. She starts to leave but turns back to ask if I actually meant she should take the toilet paper with her. My conversation with this one hiker is not going to make a difference. I could stand on this spot and tell every hiker that passes me all week to pack out their toilet paper, and it still wouldn't make a difference. I smile and assure her that packing it out is what I meant.

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## “They will not replace me if I leave” (continued)

### September 2025: Overuse

I feel like I have been embedding rocks the entire hitch. Somehow it is already Labor Day weekend and I am on my first trip to one of the busiest wilderness sites on my district. I arrived to find lots of new “brown out” in development. Flat-ish ground that was once covered with heather and huckleberry shrubs is now only a thinning layer of grass between patches of bare dirt. The grass won't survive much longer if people keep camping on it. I embed rocks in the dirt to discourage tents. I complete the scene with some logs that were almost too heavy to move and a tiny sign stating, “restoration area, please camp elsewhere.” It's far from natural, but maybe this patch will escape the fate of the surrounding sites.

I repeat the process at a smaller lake. As I work, I greet incoming parties and point them toward vacant camps, repeating some variation of “camp on durable surfaces.” The last campsite has filled as I climb out of the basin. Why is everyone coming to this tiny lake that is usually so quiet?

Half an hour down the ridgeline, I can see my camp at a lower lake. I can also see nearly 100 people scattered along the shoreline, and I'm sure I hear music. I mentally prepare myself to descend into the chaos.

A group of 12 appears, the maximum size for a wilderness party. It is 5pm on a holiday weekend. They share that they are headed to the small lake I recently departed. I suggest they head towards the larger lake in the opposite direction.

“We will just go beyond that lake to the tarns.” I cringe and explain that there is no place for 12 people to camp at the “trail-less” tarns. They seem unmoved by my explanation and annoyed at my suggestion that they change their plans. I continue down the hill, and some trail runners pass me returning from the larger lake. They didn't see the group of 12.

### October 2025: Slowing down

There is a layer of snow in the mountains, and darkness comes early. Solitude can be found again, wrapped in the harsh and protective blanket of winter. The Wilderness can rest for a while.

### November 2025: Looking ahead

They will not replace me if I leave. I have to hope that by staying I can be the bridge to the next generation of wilderness rangers.

Our Wilderness areas are invaluable and precious. Our public lands are a privilege and a responsibility. If we destroy or sell off these resources, we will never get them back.

If we keep treating these wild spaces as bucket-list destinations and provide no resources to care for them, we may lose the very thing that makes them special. We must all demand better for our Wilderness and our public lands. This fight is just getting started. 🌿

## Jim Coefield, In memoriam

By George Nickas

We often hear about unsung heroes, people who work behind the scenes yet deserve a heaping amount of credit for an organization's success. Jim Coefield was that person for Wilderness Watch. Sadly, Jim passed away in late December, leaving a hole in our community and our hearts.

Jim was a grassroots activist who, for reasons I'll never understand, took a liking to computer systems and developed an uncanny ability to troubleshoot them. For that, Coefield became the go-to guy for numerous activist organizations in the region, always willing to help at a moment's notice to get a computer back up and running or, in most cases, undo an operator error. For nearly three decades, Jim generously set up every computer/printer/network in the Wilderness Watch office, offered his expertise on everything from email and website software to external hard drives, set up our listserves, and solved every computer and

operator malfunction that came along, and there were many! Never flustered, he approached every “crisis” with incredible patience and a calming smile that said, “Calm down, you didn't lose everything on your hard drive.”



More than a master computer tech, Jim was a strategic thinker and lent his services as a board member and advisor to many conservation groups in the Northern Rockies. The only thing he wasn't good at was providing an invoice for his work. It took some serious arm-twisting to get him to accept any pay, and even then, we often failed.

Best of all, Coefield was a champion for Wilderness and a good friend to many of us at Wilderness Watch. Thank you, Jim! 🌿

# Nationwide chainsaw use considered for Wilderness

**W**ilderness Watch recently intercepted a letter from the Idaho Outfitters and Guides Association (IOGA) to Forest Service (FS) Chief Tom Schultz requesting permission to use chainsaws in Wilderness in Idaho for trail maintenance. In response, Wilderness Watch reached out to the Salmon-Challis National Forest, but we were effectively stonewalled. While Forest Supervisor Heather Degeest admitted that the agency had been in communications with outfitters and was “conducting analysis,” she refused to elaborate on the type of analysis, whether there would be public involvement, or any further details about the agency’s communications with the IOGA. Meanwhile, Wilderness Watch members continued to reach out with tips that led us to believe that this effort was not limited to Idaho but had national implications.

Sure enough, documents we obtained through the Freedom of Information Act indicate that the FS wasn’t being forthright and that Supervisor Degeest and her colleagues knew significantly more about the proposal than what we were led to believe. The Idaho proposal is part of a nationwide effort to let outfitters run chainsaws through Wilderness and the Wilderness Act. According to internal emails, the agency is bringing in an outside contractor to “help address the chainsaws in wilderness issue at the national scale.” But this is a very simple issue: chainsaws are not allowed except under extremely limited circumstances. There is no need to waste tax dollars on outside consultation—the Wilderness Act lays it out for us.

Chainsaws are the antithesis of wildness. The development of the chainsaw coincided with the evolution of the wilderness idea during the first half of the 20th century, in a race of forest preservation against industrial consumption. For a small amount of land in the United States, Wilderness won. Now certain groups who prefer the smell of gasoline and engine grease to pine sap and fresh soil, would like to haul these machines into the Wilderness. This isn’t a matter of convenience (lugging gas cans and chainsaws into the backcountry is far less efficient than using a crosscut); it’s a matter of domination.

Unfortunately, this is only the latest in a growing trend of wilderness-degrading efforts on the part of many in the commercial outfitting industry in the West. This constituency, once an ally of Wilderness, has become one of its most dangerous threats. Whether it’s demanding killing more wolves and bears to artificially inflate elk and deer numbers, promoting more aircraft use, insisting on large developed campsites and over-built pack trails and now running chainsaws in Wilderness, many outfitters now only see economic and recreation value in Wilderness rather than the value of untrammelled wildness.



Cross-cut saw work in the Frank Church-River of No Return Wilderness by Josh Page

It is hard to separate this issue from the recent, relentless attacks on public participation and the National Environmental Policy Act (NEPA)—the law requiring public oversight in agency decision making. It is not a coincidence that this attack on Wilderness was proposed as the current administration was carrying out unprecedented

assaults on public lands protections. Unfortunately, agencies like the FS have proven, yet again, that without legal guardrails, they will not conduct their work with transparency and accountability.

The outfitters argue that chainsaws are now necessary, because the FS is failing in their obligation to maintain trails. This problem was self-created by the agency’s leadership and the current administration. For decades, the FS has cut packstrings and wilderness rangers, before the current administration drove the final nails in the coffin. Now, the only solution being offered is more chainsaws in Wilderness.

It is important that we put pressure on the agencies to become more transparent and honest with the public who fund their coffers. If the FS is considering an act so brazen as allowing widespread chainsaw use in Wilderness, the public has the right to know about it. We recommend you reach out to their offices and let them know you do not approve of chainsaws chewing through Wilderness. 🍄

## You Sustain Our Work

Please consider making a special donation to help defend Wilderness.



# On the watch

## Cumberland Island deserves better

Cumberland Island National Seashore and Wilderness in southern Georgia—with its massive live oak maritime forests, saltwater marshes, and spectacular white sand beach—is the largest undeveloped barrier island on the eastern seaboard and one of the gems of America’s National Park system. The National Park Service (NPS), though, is looking to maximize visitor numbers and recreation at the expense of the Cumberland Island Wilderness and its wild inhabitants.

Once the private enclave of wealthy families, the federal government acquired the Island and established the Cumberland Island National Seashore in the 1960s to save it from real estate development. In 1982, Congress designated much of the Island’s northern two-thirds as the Cumberland Island Wilderness, or as potential Wilderness in areas where private existing rights would eventually expire. Already quite a treasure, Cumberland Island was on the path to wild restoration.

Tragically, NPS has failed to keep the promise of a wild Cumberland Island. Its proposed new Visitor Use Management Plan

(VUMP) prioritizes recreation over wildness by more than doubling daily visitor numbers from 300 to 700, adding a new ferry service to the wilderness boundary at Plum Orchard, creating two new campsites in Wilderness, increasing guided backpacking trips and kayak rentals, and expanding e-bike access across the island. It also allows degradation—including thousands of feet of trenches and a 1,200-square-foot septic leach—adjacent to the wilderness boundary, risking important habitat for loggerhead sea turtles, piping plover, and other migratory birds.

The plan would transform what is a relatively primitive experience to a more developed tourist experience. The NPS needs to change course and instead promote a wild Cumberland Island by prioritizing Wilderness and its wildlife over intensively expanding recreation. Wilderness Watch and our members are urging the agency to drop this VUMP, keep the current 300-visitor-per-day limit, and ban motorized or mechanized vehicle use north of the Wilderness’s southern boundary, except for those with private existing rights. We urged NPS not to establish ferry service to Plum Orchard, expand island commercial services, or create any new developed campgrounds in Wilderness. 🌿



Cumberland Island Wilderness by NPS

## Protect the Worthington Mountains Wilderness

The Bureau of Land Management (BLM) is considering permitting a cattle ranching company to install more than a mile of permanent fencing in the Worthington Mountains Wilderness in Nevada, despite the Wilderness Act’s prohibition on permanent structures that fail to meet the minimum requirements for administering Wilderness.

This remote Wilderness is within the Great Basin Desert, with its namesake mountain rising 4,000 feet above the valley. Mountain lions, bobcats, deer, desert bighorn sheep, kit foxes, coyotes, and other native wildlife inhabit its canyons, cliffs, and ancient forests.

BLM’s *Outcome Based Grazing John Uhalde & Co. Term Permit Renewal EA* is deeply flawed and problematic for Wilderness on many levels, with the agency’s prioritization of livestock grazing over the wild character of the Wilderness striking at the heart of it. The EA also misinterprets the law in its claim that the Wilderness Act requires livestock grazing in Wilderness at any cost, including authorizing a prohibited use like this permanent fence.

Our comments also noted that the BLM has chosen the more damaging alternative in selecting the longer of two fence options (1.2 miles vs. 0.36 mile). The agency acknowledges its preferred alternative “would have a slightly greater impact on undeveloped aspect of wilderness character ... because it involves more miles of fence line within wilderness.”

Other problems include potential motorized and mechanized use, and violating the Act’s requirement for solitude and “unconfined” recreation in Wilderness—with the EA stating the fence is, “a form of confinement that will require the visitor to either navigate around the fence or climb over or crawl through or under it,” and it’s a “reminder of modern expanding settlement therefore impacting solitude.”

Rather than building unlawful fencing to facilitate grazing an inappropriate number of cows in this ecologically-sensitive desert Wilderness, the BLM should uphold its statutory responsibility to protect the Worthington Mountains Wilderness by reducing the number of cows allowed to graze there. 🌿

# On the watch

## Protect trailless areas in the White Mountains

**W**ilderness Watch is concerned about the Forest Service's (FS) proposal to amend its Forest Plan in regards to wilderness trail management on the White Mountain National Forest (WMNF) in New Hampshire and Maine. The agency is trying to do the right thing by addressing trail issues in Wilderness, but instead should consider trails individually.

The WMNF has 150,000 acres of Wilderness—the Pemigewasset, Great Gulf, Presidential Range-Dry River, Wild River, Sandwich Range, and Caribou-Speckled Mountain. Moose, black bears, Canada lynx, fishers, beavers, coyotes, peregrine falcons, and bobcats call the mountains, forests, and river valleys their home.

Wilderness on the WMNF has trailless zones, and the current Forest Plan requires wilderness trails to be within 1000-foot-wide trail corridors. Trailless areas protect plants and wildlife, keep Wilderness from being overrun by humans, and offer a primitive experience for those who venture there. The FS proposal to allow trails—including possibly new, relocated, and user-created trails—outside of trail corridors could weaken protections throughout these six Wildernesses.

Instead of amending the Forest Plan, the agency should make every effort to keep trails in Wilderness on the WMNF within trail corridors; should analyze wilderness impacts through site-specific NEPA analysis for new trails or trail relocations outside of trail corridors; and should complete all trail work in Wilderness using traditional skills and tools. 🌿

## Hands-off Wilderness

**W**ilderness Watch recently signed onto a letter calling on the Forest Service (FS) to withdraw its *Environmental Assessment for Post-Fire Recovery Actions on National Forest System Lands*, which fails to recognize the hands-off management approach the Wilderness Act requires, among other problems with this damaging proposal.

The EA covers all National Forest lands across the country, without clear exemptions or distinct management protocols

for Wilderness, and with no requirement for environmental review or public comment. The proposal would expedite “active management,” a euphemism for logging and road building. The Wilderness Act allows land managers to suppress active fires in Wilderness, but it does not allow for what this EA proposes—logging, building roads, and artificial reforestation/replanting months after fires are extinguished.

By including Wilderness in this plan—with activities the Wilderness Act prohibits—the FS is ignoring its responsibility to protect untrammeled Wilderness, where natural processes, including fire, are allowed to play out. At the very minimum, if the FS pursue this, it must exclude Wilderness. 🌿

## Great Bear Wilderness threatened by logging on its boundaries

**W**ilderness Watch is concerned about the Forest Service's (FS) *Granite Moccasin Project*, a proposal to log 4,689 acres across the Flathead National Forest in northwest

Montana, including 175 acres next to the Great Bear Wilderness. The FS is relying on an “Emergency Action Determination” to sidestep National Environmental Policy Act requirements—including the public comment period.

Wilderness Watch noted in our letter to the FS the many ways proposed logging, road construction, and heavy machinery in riparian areas threaten the clean water, healthy watershed, and untrammeled character of the Great Bear. Noise from this

industrial logging project will be heard miles into the Wilderness, impacting human visitors and wildlife alike. Sensitive species such as wolverines, grizzly bears, Canada lynx, wolves, and mountain goats could be displaced from vital habitat and a key migration corridor. And, seven miles of new roads outside the Wilderness would act as conduits for invasive species and illegal motorized incursions into the Wilderness.

Unlike some Wildernesses, Congress designated the Great Bear via a “clean” wilderness bill without an anti-buffer clause, which means the FS must ensure the Great Bear's wilderness character is not degraded from activities outside of the Wilderness, including on its boundaries. Those that would harm wilderness character, such as this project, need to be mitigated or relocated. 🌿



Great Bear Wilderness by Troy Smith



**WILDERNESS WATCH**

*Keeping Wilderness Wild*

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## Time to think about the legacy we'll leave

By Brett Haverstick

As threats toward Wilderness and its wildlife increase each day, Wilderness Watch continues to relentlessly push back on and defeat harmful proposals, regulations, illegal projects, and anti-wilderness legislation. This newsletter is a testament to what we are accomplishing together.

Thank you for continuing to read our action alerts and submit your comments to defend Wilderness and its wildlife. Public involvement is a cornerstone of our democracy, and it's imperative for all of us to participate in decision-making processes. Endless pressure, endlessly applied leads to change, and eventually the opportunity to chart a new path.

While we fight day-to-day to defend Wilderness, we must also have a vision for a better future—a future where Wilderness freely pursues its evolutionary destiny without human meddling, where wildlife lives undisturbed, and humans can still find solitude and spiritual renewal. Indeed, this was the original intent of the 1964 Wilderness Act!

In order for wilderness to endure into the eternity of the future, there must be a fundamental change to how Wilderness is administered and safeguarded. It won't happen overnight, but we're up for the challenge.



Bruneau-Jarbridge Rivers Wilderness by Bob Wick/BLM

One of the ways that you can help secure this future for Wilderness is by leaving a Legacy Gift to Wilderness Watch through your will or trust. A Legacy Gift is a forward-thinking investment that allows you to control your assets during your lifetime, and you have the freedom to update your plans at any time.

A Legacy Gift of any size will make a huge difference for Wilderness and its wildlife, and ensure that Wilderness Watch can keep up the fight for the wild! Wilderness Watch is built for the long haul, and our mission to defend Wilderness will never waiver.

Please visit our website, [wildernesswatch.org/legacy-giving](http://wildernesswatch.org/legacy-giving), or contact me at [bretth@wildernesswatch.org](mailto:bretth@wildernesswatch.org) / 406-542-2048 x1 to learn more about our Legacy Giving program.

Thank you! 🌿