



P.O. Box 9175 | Missoula, MT 59807 | 406.542.2048 | [wild@wildernesswatch.org](mailto:wild@wildernesswatch.org) | [www.wildernesswatch.org](http://www.wildernesswatch.org)

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Thomas M. Schultz, Jr.  
Chief, U.S. Forest Service  
1400 Independence Ave, SW  
Washington, D.C. 20250  
[tom.schultz@usda.gov](mailto:tom.schultz@usda.gov)

CC: Chris French, Associate Chief of the U.S. Forest Service: [chris.french@usda.gov](mailto:chris.french@usda.gov)

*RE: Opposition to Outfitters and Guides' Request for Chainsaws in Wilderness*

Dear Chief Schultz,

On behalf of our hundreds of thousands of members and supporters across the country, we write with growing concern over the Forest Service's apparent consideration of commercial outfitters and guides' request to use chainsaws for trail and camp clearing across much of the National Wilderness Preservation System. The undersigned urge you to reject this request and demonstrate that the Forest Service is still up to the important task of administering Wilderness and fulfilling its statutory duty to preserve wilderness character.

The Wilderness Act was passed "to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition." To that end, Congress prohibited mechanized and motorized uses in Wilderness. While noise is a concern, the rationale for prohibiting both motorized and mechanized use was far more profound. Motorized tools are the antithesis of restraint—they allow humans to transform the landscape quickly and easily to meet our ends rather than transforming our attitudes to accommodate the landscape. Chainsaws, electric or gasoline powered, embody the attitude that human convenience, impatience, and demand come first, and that no place is beyond the reach of our appetite to dominate and control. Chainsaw use fundamentally undermines the goals of the Wilderness Act.

Chainsaws—like any motorized use—are strictly prohibited in Wilderness unless they meet the Wilderness Act's narrow exception—each use must be "necessary to meet minimum requirements for administration of [wilderness] for the purpose of [the Wilderness Act]." The Forest Service is not entertaining a narrowly-tailored request to use a chainsaw in a specific area for a specific task—an inquiry that itself would face a high legal hurdle. Rather, the Forest Service is considering a diffuse request by commercial interests to clear wilderness trails across broad regions for an unknown period of time. This is a precedent-setting consideration that could significantly impact the National

Wilderness Preservation System, legally and practically, by systemically degrading wilderness character and outsourcing the Forest Service's statutory duties of wilderness administration to third parties, including those with significant commercial conflicts of interest.

Clearing trails with chainsaws is not necessary to meet minimum requirements for administering Wilderness. Many Wildernesses have minimal to non-existent trail systems; wilderness character, and the wildlife who rely on it, will not suffer with the natural blockage of existing trail systems. Further, commercial outfitters and guides can adjust operations to accommodate conditions on the ground and to accommodate the pace of wilderness-compatible, non-motorized trail work. Part of the wilderness experience is meeting and experiencing Wilderness on its own terms—an experience that is increasingly rare in our tech-dominated, overly curated world. Visitors may not be able to access everywhere they desire as easily as they desire due to blowdown on trails, but that, too, is part of a wilderness experience. As the Forest Service Manual explains:

Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.

To the extent the Forest Service wants to clear trails for access but is understaffed to do so, the lack of non-motorized trail crews is a problem of the Forest Service's own making. The Forest Service has been using trail crews with crosscut saws in Wilderness for as long as the National Wilderness Preservation System has existed, and even before that. However, over the last decade or two, the agency has been systematically abandoning and defunding its wilderness program and increasingly outsourcing wilderness administration to volunteers and third parties. The wilderness program losses over the last couple of years are simply the final nail. The result has been a catastrophic loss in trained, experienced wilderness leadership staff at the national and regional levels, significant loss of experienced wilderness rangers, and the gutting of seasonal wilderness crews. The solution to this problem is to recommit to Forest Service wilderness programs and wilderness-compatible stewardship rather than resorting to chainsaws and other prohibited activities that degrade wilderness character.

The undersigned organizations and wilderness professionals urge you to reject the commercial outfitters' requests for use of chainsaws in Wilderness. If the Forest Service is seriously considering authorizing chainsaws for trail clearing, either by agency crews or private entities—a precedent setting decision with significant implications for our Wilderness System—the decision should not be made behind closed doors. The public must be properly notified and given the opportunity to comment.

Thank you for your consideration,



Dana Johnson  
Wilderness Watch Policy Director, Attorney  
[danajohnson@wildernesswatch.org](mailto:danajohnson@wildernesswatch.org)

## CONSERVATION AND TRAIL ORGANIZATIONS

David Gibson  
Adirondack Wild  
[dgibson@adirondackwild.org](mailto:dgibson@adirondackwild.org)

Rick McGuire  
Alpine Lakes Protection Society, President  
[rckmcguire@gmail.com](mailto:rckmcguire@gmail.com)

Sarah Stewart  
Animals Are Sentient Beings, Inc, President  
[webmaster@animalsaresentientbeings.org](mailto:webmaster@animalsaresentientbeings.org)

Paula Hood  
Blue Mountains Biodiversity Project, Co-Director  
[paula@bluemountainsbiodiversityproject.org](mailto:paula@bluemountainsbiodiversityproject.org)

Michael J. Painter  
Californians for Western Wilderness, Coordinator  
[mike@caluwild.org](mailto:mike@caluwild.org)

Helen K. Chase  
The Catskill Center for Conservation and Development, Board of Directors  
[hkchase190@gmail.com](mailto:hkchase190@gmail.com)

Will Harlan  
Center for Biological Diversity, Southeast Director  
[wharlan@biologicaldiversity.org](mailto:wharlan@biologicaldiversity.org)

Daniel Harm  
The Center for Responsible Forestry  
[daniel@c4rf.org](mailto:daniel@c4rf.org)

Sonia Demiray  
Climate Communications Coalition, Executive Director  
[sonia@demirayink.com](mailto:sonia@demirayink.com)

Denise Boggs  
Conservation Congress, Director  
[denise@conservationcongress-ca.org](mailto:denise@conservationcongress-ca.org)

Karen Ashikeh  
Earth Neighborhood Productions, Media Manager  
[wayscans5@gmail.com](mailto:wayscans5@gmail.com)

Josh Schlossberg  
Eco-Integrity Alliance  
[steeringcommittee@eco-integrityalliance.org](mailto:steeringcommittee@eco-integrityalliance.org)

Gustav W Bekker  
El Sendero Backcountry Ski and Snowshoe Club, Founder / Former President  
[gwbekker@gmail.com](mailto:gwbekker@gmail.com)

Kimberly Baker  
Environmental Protection Information Center (EPIC), Conservation Director  
[kimberly@wildcalifornia.org](mailto:kimberly@wildcalifornia.org)

Josh Hart  
Feather River Action!  
[josh@featherriveraction.org](mailto:josh@featherriveraction.org)

Kevin Hood  
Forest Service Employees for Environmental Ethics (FSEEE), Executive Director  
[kevin@fseee.org](mailto:kevin@fseee.org)

Anja Heister, PhD  
Footloose Montana, Executive Director  
[anja@footloosemontana.org](mailto:anja@footloosemontana.org)

Emily Diznoff  
Forest Keeper, Program Director  
[info@forestkeeper.org](mailto:info@forestkeeper.org)

River Harlan  
Friends of Big Ivy, Program Director  
[friendsofbigivy@gmail.com](mailto:friendsofbigivy@gmail.com)

Larry Campbell  
Friends of the Bitterroot, Conservation Director  
[lcampbell@bitterroot.net](mailto:lcampbell@bitterroot.net)

Steve Schultz  
Friends of the Boundary Waters Wilderness, Government Relations Director  
[steve@friends-bwca.org](mailto:steve@friends-bwca.org)

Jeff Juel  
Friends of the Clearwater, Forest Policy Director  
[jeffjuel@wildrockies.org](mailto:jeffjuel@wildrockies.org)

Arlene Montgomery  
Friends of the Wild Swan, Program Director  
[arlene@wildswan.org](mailto:arlene@wildswan.org)

River Harlan  
Forest Keeper, Program Manager  
[info@forestkeeper.org](mailto:info@forestkeeper.org)

Clint Nagel  
Gallatin Wildlife Association, President  
[clint\\_nagel@yahoo.com](mailto:clint_nagel@yahoo.com)

Cynthia Magnuson  
Great Old Broads for Wilderness  
[cmcindyidaho@gmail.com](mailto:cmcindyidaho@gmail.com)

Olivia Juarez  
Green Latinos  
[oliviajuarez@greenlatinos.org](mailto:oliviajuarez@greenlatinos.org)

David Nickell  
Heartwood, Council Chair  
[info@heartwood.org](mailto:info@heartwood.org)

Paul Sieracki  
Inland Empire Task Force  
[paul.sieracki@gmail.com](mailto:paul.sieracki@gmail.com)

Joseph Scalia III  
Institute for a Democratic Psychoanalysis, Co-Director  
[josephscalia@dempsysa.org](mailto:josephscalia@dempsysa.org)

John Siekmeier  
Izaak Walton League of America, Minnesota Division  
[john.siekmeier@outlook.com](mailto:john.siekmeier@outlook.com)

Robert Scheierl  
Izaak Walton League of America, Wes Libbey Northern Lakes Chapter, President  
[rscheierl@live.com](mailto:rscheierl@live.com)

Jennifer Mamola  
John Muir Project, Policy and Advocacy Director  
[jennifermamola@johnmuirproject.org](mailto:jennifermamola@johnmuirproject.org)

Dr. Nancy Messmer  
Lions Club International, Regional Environment Service Chair for BC, WA, N. ID  
[able@olypen.com](mailto:able@olypen.com)

John Weisheit  
Living Rivers  
[John@livingrivers.org](mailto:John@livingrivers.org)

Dr. Kari Gunderson  
Montana Wilderness Education School  
Wilderness Management Education Specialist  
[cnd2543@blackfoot.net](mailto:cnd2543@blackfoot.net)

Jeff Randa  
National Wilderness Stewardship Alliance, Board Chair  
[jeff.randa@wildernessalliance.org](mailto:jeff.randa@wildernessalliance.org)

Joelle Marier  
Former Executive Director of the National Wilderness Stewardship Alliance  
[joelle.marier@gmail.com](mailto:joelle.marier@gmail.com)

Sara Johnson  
Native Ecosystems Council, Director  
[sjohnsonkoa@yahoo.com](mailto:sjohnsonkoa@yahoo.com)

Bjorn Fredrickson  
New Mexico Wild  
[bjorn@nmwild.org](mailto:bjorn@nmwild.org)

Bill Mott  
The Ocean Project, Executive Director  
[bmott@theoceanproject.org](mailto:bmott@theoceanproject.org)

Brian Avery McChristian  
Oregon Community Trees, Board Member  
[avery.mcchristian@gmail.com](mailto:avery.mcchristian@gmail.com)

Deanna Meyer  
Prairie Protection, Executive Director  
[prairieprotectioncolorado@gmail.com](mailto:prairieprotectioncolorado@gmail.com)

Michael Kellett  
RESTORE: The North Woods, Executive Director  
[kellett@restore.org](mailto:kellett@restore.org)

Megan Turtle Southern  
Rewilding Institute, Director  
[tortuga@rewilding.org](mailto:tortuga@rewilding.org)

Tom Martin  
River Runners for Wilderness  
[tommartin@rrfw.org](mailto:tommartin@rrfw.org)

Mark Pearson  
San Juan Citizens Alliance, Executive Director  
[mark@sanjuancitizens.org](mailto:mark@sanjuancitizens.org)

Jack Stauss  
Save Our Canyons, Executive Director  
[jack@saveourcanyons.org](mailto:jack@saveourcanyons.org)

Amy Anderson  
Selkirk Conservation Alliance, Executive Director  
[anderson@scawild.org](mailto:anderson@scawild.org)

Dave Willis  
Soda Mountain Wilderness Council, Chair  
[sodamtn@mind.net](mailto:sodamtn@mind.net)

Zack Porter  
Standing Trees, Executive Director  
Former USDA Forest Service Wilderness Ranger  
[zporter@standingtrees.org](mailto:zporter@standingtrees.org)

Chad Dawson  
SUNY College of Environmental Science and Forestry, Professor Emeritus  
[cpdawson1@gmail.com](mailto:cpdawson1@gmail.com)

Keith Hammer  
Swan View Coalition, Chair  
[keith@swanview.org](mailto:keith@swanview.org)

Janice Reid  
Umpqua Watersheds, President and Conservation Chair  
[janice@umpquawatersheds.org](mailto:janice@umpquawatersheds.org)

Carol Olson  
Ventana Wilderness Alliance, Executive Director  
[carol.olson@ventanawild.org](mailto:carol.olson@ventanawild.org)

Frumie Selchen, Genevieve Christy  
Michael Schneider  
Wonalancet Out Door Club (WDOC)  
Co-Presidents, Vice President, and Trails Chair  
[wonalancetoutdoorclub@gmail.com](mailto:wonalancetoutdoorclub@gmail.com)

Susan Hutton  
Whatcom Million Trees Project, Executive Director  
[susan@whatcommilliontrees.org](mailto:susan@whatcommilliontrees.org)

Thomas Hollender  
White Mountain Conservation League, Board of Directors  
[twhollender@gmail.com](mailto:twhollender@gmail.com)

Jessica Howell-Edwards  
Wild Cumberland, Executive Director  
[jessica@wildcumberland.org](mailto:jessica@wildcumberland.org)

Dave Willis  
Wild Hope, Coordinator  
[sodamtn@mind.net](mailto:sodamtn@mind.net)

Peggie DePasquale  
Wyoming Wilderness Association, National Forest Wildlands Director  
[peggie@wildwyo.org](mailto:peggie@wildwyo.org)

Patricia Hine  
350 Eugene, Co-President  
[president@350eugene.org](mailto:president@350eugene.org)

Nancy E. Larson  
David B. Larson  
Melissa LaPlume  
White Mountain National Forest Trail Maintenance Volunteers  
[nancylarson40@gmail.com](mailto:nancylarson40@gmail.com)  
[dlarson1964boris@gmail.com](mailto:dlarson1964boris@gmail.com)  
[melissamay78@gmail.com](mailto:melissamay78@gmail.com)

Suzanne Perry  
Tom Perry  
US Forest Service Trail Maintenance Volunteers  
[sperry66@yahoo.com](mailto:sperry66@yahoo.com)  
[congtperry@gmail.com](mailto:congtperry@gmail.com)

Heidi Proulx  
Trail Wrights, Trail Worker  
[heidiproulx@comcast.net](mailto:heidiproulx@comcast.net)

Adam Mooshian  
WMNF, AMC trail adopter  
[amooshian@yahoo.com](mailto:amooshian@yahoo.com)

## **AGENCY SPECIALISTS**

Marty Almquist  
Retired US Forest Service  
Wilderness Ranger and Outfitter Permit Administration  
[martyalmquist@outlook.com](mailto:martyalmquist@outlook.com)

Chris Barns  
Retired Bureau of Land Management-WO  
Wilderness Specialist  
[cvbarns@gmail.com](mailto:cvbarns@gmail.com)

Jennifer Blake  
Former USFS  
District Ranger and Wilderness Manager  
[jenni\\_blake@hotmail.com](mailto:jenni_blake@hotmail.com)

Sally Blevins  
Former US Forest Service  
Wilderness Ranger / Educator  
[sallyandraven@yahoo.com](mailto:sallyandraven@yahoo.com)

Suzanne Cable  
Retired US Forest Service, Okanogan-Wenatchee National Forest  
Wilderness Program Manager  
[suzcablewild@outlook.com](mailto:suzcablewild@outlook.com)

Tom Carlson  
Retired US Forest Service  
Forest Service Representative at Arthur Carhart National Wilderness Training Center  
[tcarlson2319@gmail.com](mailto:tcarlson2319@gmail.com)

Debra Davis  
Retired US Forest Service, Okanogan Wenatchee National Forest  
Crosscut Saw Program Coordinator  
[dedavis1310@gmail.com](mailto:dedavis1310@gmail.com)

Tim Devine  
Retired National Park Service  
Wilderness Specialist / Arthur Carhart National Wilderness Training Center  
[tridevine@gmail.com](mailto:tridevine@gmail.com)

Kearstin Edwards  
Former US Forest Service  
Wilderness Specialist  
[kkeacorn@yahoo.com](mailto:kkeacorn@yahoo.com)

Mark Fincher  
Retired National Park Service  
Wilderness Specialist  
[yoserat@gmail.com](mailto:yoserat@gmail.com)

Katherine Fitch  
Former US Forest Service  
Wilderness Ranger  
[kcecilfitch@gmail.com](mailto:kcecilfitch@gmail.com)

Debra Gale  
Retired US Forest Service, Bitterroot National Forest  
Staff and Program Lead for Wilderness, Recreation, Trails, Outfitter and Guides, and Wild and Scenic Rivers  
[galemt@cybernet1.com](mailto:galemt@cybernet1.com)

Jeff Halligan  
Retired US Forest Service, Packer  
[wilderness50@outlook.com](mailto:wilderness50@outlook.com)

Nick Hazelbaker  
Retired US Forest Service  
Trail Manager  
[nhazelbaker1@hotmail.com](mailto:nhazelbaker1@hotmail.com)

Michael Kauffmann  
Bigfoot Trail Alliance  
Executive Director  
[michael@bigfoottrail.org](mailto:michael@bigfoottrail.org)

Hillary Lampard  
Former US Forest Service  
[hlampard@yahoo.com](mailto:hlampard@yahoo.com)

Peter Landres  
Former US Forest Service  
Aldo Leopold Wilderness Research Institute  
[peter.landres@gmail.com](mailto:peter.landres@gmail.com)

Chris Mackay  
Former US Forest Service  
[christopherryanmackay@gmail.com](mailto:christopherryanmackay@gmail.com)

Maria Mantas  
Retired US Forest Service, Flathead National Forest  
Botanist  
[mariamantas22@gmail.com](mailto:mariamantas22@gmail.com)

Kathy McAllister  
Retired US Forest Service  
Deputy Regional Forester  
[kmcallister@bigsky.net](mailto:kmcallister@bigsky.net)

Chris McCarthy-Ryan  
Retired US Forest Service Northern Region  
Regional Program Manager, Wilderness, Wild and Scenic Rivers, Outfitters and Guides  
[mcrayan2010@gmail.com](mailto:mcrayan2010@gmail.com)

Dylan McCoy  
US Forest Service  
Wilderness Specialist  
[breatheinunion@gmail.com](mailto:breatheinunion@gmail.com)

Linda Merigliano  
Retired US Forest Service  
Wilderness and Recreation Program Manager  
[lmerig@silverstar.com](mailto:lmerig@silverstar.com)

Connie Myers  
Retired Multi-Agency  
Arthur Carhart National Wilderness Training Center Director  
[cgmyers7@gmail.com](mailto:cgmyers7@gmail.com)

Taylor Orr  
Former US Forest Service  
Wilderness Ranger  
[taylororr8@gmail.com](mailto:taylororr8@gmail.com)

Nancy Roeper  
Former US Fish and Wildlife Service  
[nancy.roeper@verizon.net](mailto:nancy.roeper@verizon.net)

Patricia Stieger  
Retired US Forest Service, Payette National Forest Krassel Ranger District  
Trails, Recreation, Wilderness staff  
[pstieger83@gmail.com](mailto:pstieger83@gmail.com)

Ken Straley  
Retired US Forest Service  
[nemokrs@gmail.com](mailto:nemokrs@gmail.com)

Ralph Swain  
Retired US Forest Service  
Regional Wilderness Program Manager  
[ralphswain@gmail.com](mailto:ralphswain@gmail.com)

N Taylor  
Former US Forest Service  
Wilderness Program Manager  
[ntaylor.alpine@gmail.com](mailto:ntaylor.alpine@gmail.com)

Jennifer Zbyszewski  
Retired US Forest Service  
Wilderness Program Manager  
[jenkzski@gmail.com](mailto:jenkzski@gmail.com)