

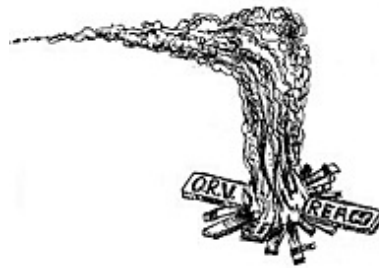


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Around the Campfire

with Uncle Dave Foreman



Wilderness for the Drylands Bureau of Land Management Wilderness

(Note: This edition of Around the Campfire is adapted from my new book, The Great Conservation Divide, which is now in print. An announcement and order form will soon go out to this list.)

Bureau of Land Management in the Wilderness Act

Howard Zahniser and other wilderfolks wanted to have all four federal land managing agencies in the Wilderness Act, but one did not make it. This was the Bureau of Land Management. Although it oversaw more land than the other three agencies, it had drawbacks insofar as Wilderness went. For one, BLM had never administratively set up primitive areas of any kind. Doug Scott writes

BLM...had not administratively designated any areas equivalent to the national forest primitive areas. That made it prohibitively difficult to require a formal wilderness review for BLM-administered lands. There would have been no way to circumscribe the extent of initial wilderness reviews.... Suggesting an inventory of all BLM roadless lands in that era would have been politically unacceptable.[\[1\]](#)

Moreover, it was still a bit up in the air whether the public lands BLM cared for should and would be kept as public lands. That was not settled until 1970; BLM had no “organic act” until the Federal Lands Policy and Management Act (FLPMA) in 1976.

The second drawback was that pretty much the only folks who knew about BLM and its lands were those who had long ruled them for the good of their pocketbooks. We can put them into four cubbyholes.

1. Grazing permittees, some of whom overlorded the public land in “their” ranches and did not let the public in, even though that public had every right to go in.
2. The mining industry, which believed that the 1872 Mining Act gave them the freedom to do whatever they wanted on public land and not worry about any land they scalped or banes they left.
3. Energy corporations (oil, gas, and coal), which shared the miners’ beliefs, but who were under the Mineral Leasing Act instead of the rootin’, tootin’ 1872 Mining Law.
4. Utilities, which saw BLM land as a blank canvas on which they could draw lines for power and telephones, and for pipes carrying oil, gas, and water.

These four might bicker among themselves a little, but they did not fuss that the BLM worked for them. The poor sister to these mighty four were hunters since BLM land was wide-open for lawful hunting and, notwithstanding widespread overgrazing, often had good hunting for birds and pronghorn. Others, such as poachers, trappers, pothunters and other archaeological site looters, and jeepers, who liked to wander about the outback, also prowled BLM land as country where there were no laws. Many times, such desert rats did not even know something like the Bureau of Land Management existed.

The third drawback was that darn few wilderfolks knew that there was any good wilderness in the wide sweep of lands BLM oversaw throughout the Western states and Alaska. Drylands, unless they had amazing rocks, were as yet not loved, but by a few oddballs, such as Edward Abbey, who had not yet written *Desert Solitaire*. Even the small bunch of good BLM staffers didn’t think there was much wilderness on their lands. Chuck Stoddard, a top resource economist and director of BLM under Interior Secretary Stewart Udall, was one such BLMer. In the late 1970s, he was on The Wilderness Society’s Governing Council and warned Debbie Sease, who was overseeing the startup of the BLM wilderness review for The Wilderness Society, that he did not think there was much land at all under the BLM that had Wilderness worth. Debbie sat him down for a slideshow of wild BLM lands that her grassroots helpers were finding. Chuck was blown away by the slides he saw. He couldn’t believe they were from the lands he had once had under his wings.

What this all means is that The Wilderness Society, Sierra Club, and friends wanted BLM put in the Wilderness Act, but they had neither the knowledge nor the fired-up grassroots in 1964 and before to make much of a fight about it.

So. Public lands under the Bureau of Land Management were dropped from the Wilderness Act and from being in the National Wilderness Preservation System. One stalwart soul fought to have BLM in the Wilderness Act from early on and afterwards was untiring in singing the wonders of BLM wilderness and other outstanding areas: the amazing Charlie Watson of Nevada.

Federal Land Policy and Management Act (FLPMA)

That BLM was left out of the Wilderness Act was only put right in 1976 when Congress pulled together an organic act for the BLM called the Federal Land Policy and Management Act (FLPMA). The Wilderness Society worked hard throughout the cobbling together of FLPMA to get a Wilderness Area review and recommendation process. John Melcher of Montana was chair of the House Subcommittee on Public Lands and took the lead on FLPMA. Melcher was not always a friend to conservationists, but he did us right insofar as a Wilderness review and recommendation process went into FLPMA. He should therefore be acknowledged as one of a few who helped to shape the National Wilderness Preservation System into a truly nationwide and ecologically representative system. Harry Crandell of TWS wrote the Wilderness section (called “602” for its section number in FLPMA). He also rode herd on The Wilderness Society’s field representatives so that we would put BLM Wilderness high in our to-do stacks.

I don’t recall the BLM brass naysaying a Wilderness review. Likely they saw it as a way to jack up their status and visibility (and budget) and to show off a few wonders as good as anything the other agencies had. I do recall one meeting in Washington with top BLM staff to talk about the Wilderness review, though. I was likely a bit over-the-top in what I saw as the potential for BLM Wilderness until Roman Koenings, an old-time BLM bureaucrat and associate director, exploded, “How many millions of acres of sagebrush flats do you want in the Wilderness System?!” I calmly said back to him, “Why, as many as qualify, sir,” and left him utterly befuddled. I don’t think he had ever talked to anyone who thought mile after mile of flat

sagebrush country was good for anything but grazing. (The biggest standalone BLM Wilderness Area today is Nevada's Black Rock Desert of over 300,000 acres—totally flat with lots of sagebrush.)



Karen Tanner and Ron Kezar on a field trip to Desatoya Mountains, Nevada

© Dave Foreman

Melcher held field hearings around the West. I had the job of turning out lots of BLM wilderness backers to the Albuquerque hearing. Other Wilderness Society field reps and I did good work. Throughout the western states we showed Melcher and other subcommittee members that many folks were behind BLM wilderness. We field reps had another job, too, and that was to show the subcommittee members that BLM lands held likely Wilderness Areas of the “quality” of what the National

Forests and National Parks had. Some worried that this would not be easy, and Melcher was straightforward in telling conservationists we had to “wow” congressmembers with eye-popping, breath-taking scenic beauty. We had little time to come up with such lands before the hearings.

I recall that work with a happiness that nothing else has ever matched. It was the unknown we had to explore. For many years the National Forests had been ridden, hiked, mapped, looked at; the great spots named. We had nearly none of that background for BLM. Only a few standouts, such as southern Utah's Escalante River and some mountains in the California Desert, were known. Otherwise, it was the great unknown. And it was holy bliss to come to know it. In New Mexico, with Debbie Sease (my wife at the time) and Sierra Club leader Wes Leonard from El Paso, I came up with a good list of de facto BLM wilderness. Climbers in the New Mexico Wilderness Study Committee already knew a few peaks, such as Ladron Mountain south of Albuquerque. The main wit for likely BLM wilderness, though, was a somewhat shadowy retired CIA operative, Col. Henry Zeller, who looked like someone from the best days of Her Majesty's British Empire. He would have looked good in a pith helmet and with a pipe. Zeller then lived in Silver City and was in the local Audubon Society in that heaven for birders. He drew up a list for us that to this day has the “best” of the BLM areas in New Mexico. How he came up with his list of the best, I had no clue.[\[2\]](#)

Work in other Western states followed a like path, with more and more wilderfolk falling in love with the out-of-the-way, overlooked wilderness of the drylands.

The BLM Wilderness Review

Section 602 of FLPMA bade BLM to undertake, with widespread help from the public, a three-stage Wilderness review process:

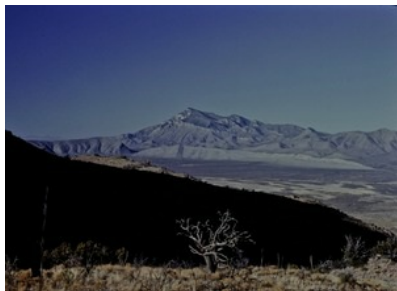
- 1) Inventory all roadless areas of 5,000 acres or more on BLM lands (smaller areas alongside roadless areas in National Forests, Parks, and Wildlife Refuges were also to be inventoried).
- 2) Evaluate all the identified roadless areas to determine if they had wilderness characteristics as set out in the Wilderness Act. If so, they were to be designated as formal Wilderness Study Areas (WSAs); if not, they were to be dropped from further weighing.
- 3) Conduct detailed studies of the WSAs and make Wilderness Area designation or release recommendations to Congress by 1991.

FLPMA recognized one special landscape overseen by BLM: the California Desert, which it designated as a standalone 12.1 million-acre Conservation Area. BLM was mandated to draw up a management plan with Wilderness Area recommendations by 1980—the “expedited” review. Interior Secretary Cecil Andrus signed off on a thoroughly lousy plan. BLM had inventoried 5.7 million acres of land qualifying for Wilderness, while conservationists had found over 8 million acres. Of the 5.7 million acres, only a piddling 2.1 million were proposed for Wilderness. Andrus may have helped on the Alaska Lands Act, but when it came to Wilderness for BLM or in RARE II, he was no friend to conservationists. But Ronald Reagan's Interior Secretary, the creepy James Watt, made Andrus look like John Muir. Watt straightaway cut the 2.1 million acres to 1.8 million and illegally went against nonimpairment for WSAs by offering energy leases, proposing to build roads, and allowing other landscaping.

The strong bunch of desert rats in the Southern California Sierra Club and California Desert Protection League went around BLM and to their Senator, Alan Cranston. Jim Eaton, then with the California Wilderness Coalition, remembers how the grassroots activists put together their bill for Cranston:

My recollection is that the conservationists were fine-tuning a 3.2-million acre bill. At a meeting at Mabel Barnes' house, where we were going to make our final proposal, I pointed out that the bill never would get bigger, only smaller. One by one, folks decided this area and that one deserved to be added until we got to nearly 9-million acres....I think the California desert story is important, because it is perhaps the last time the mostly volunteer conservation force developed the proposal. Although there were increasing numbers of paid staffers involved, it was the volunteers who developed that great wilderness bill.[\[3\]](#)

Jim offers one the great lessons for conservationists here: ask for what you want; don't compromise before you go to Congress. Had Jim not spoken up, think what a dinky little California Desert Wilderness bill we would have gotten. Conservationists went to Cranston with what they truly wanted and in 1986 he introduced an outstanding bill—maybe the strongest single Wilderness bill introduced in Congress up to that time. Much of what conservationists wanted as BLM Wilderness was added to Joshua Tree and Death Valley National Monuments, which would become National Parks as would a new East Mohave National Park. Cranston's bill would designate 4.3 million acres as Wilderness in the three new Parks and eighty-one BLM Wilderness Areas with 4.5 million acres—8.8 million acres of Wilderness in all. Desert rats who loved Wilderness and desert rats who wanted to go everywhere by gasoline fought it out with their chosen members of Congress until Cranston left the Senate. California's new Senators, Diane Feinstein and Barbara Boxer, picked up the fight from Cranston. In 1993, they offered a watered-down 7 million acre Wilderness bill. After much political jockeying and more compromises from Feinstein, the bill passed the House and then Senate (fourteen Republicans voted for it) before the election in 1994. Though whittled down from Cranston's original vision, the California Desert Protection Act was the greatest legislative win for Wilderness since the 1980 Alaska National Interest Lands Conservation Act. The BLM's pissant 2 million acre proposal had been long forgotten.[\[4\]](#)



Big Hatchet Mountains WSA from
Alama Hueco Mountains WSA, New
Mexico
© Dave Foreman

By 1976, BLM had administratively set aside a few "Primitive Areas" and "Outstanding Natural Areas." FLPMA made all such areas Instant Study Areas (ISAs) that were to be treated as WSAs. Recommendations for or against Wilderness designation were due by July 1, 1980 for ISAs. For other Wilderness Study Areas, recommendations were to be given to the President by 1991 and the President had until 1993 to send recommendations to Congress. These deadlines were met. Moreover, all WSAs, whether

recommended by BLM for Wilderness or not, were to be kept "unimpaired" until Congress put thumbs up or down on each. Thanks to congressional foot-dragging, most WSAs picked thirty years ago, other than those in Arizona and the California Desert, where thorough and pretty darn good Wilderness bills were made law, are still on the books to be kept unimpaired.[\[5\]](#) In the late 1970s, conservationists, led by Debbie Sease of The Wilderness Society, and BLM went back-and-forth on how tough the interim management standards to keep WSAs unimpaired should be.

Even after the interim management standards were finalized, such stewardship has been sometimes seen by BLM and wilderness lovers in unlike ways; watchdogging what happens in WSAs is a key job for wilderness clubs and wilderness-loving desert rats. Too often it is overwhelming work to keep an eye on every WSA. (In one case, a power company built a hulking power line across a WSA in Nevada without the agency even knowing about it!) Roads and sundry other wounds have a way of creeping into unwatched WSAs. Wilderness Study Areas are not necessarily closed to off-road vehicles and bicycles—they can be allowed on primitive routes where such use was established before designation of the WSA. Under BLM regulations, there is a bit of wiggle room for local managers. Moreover, there is much ORV and mountain bike trespass into WSAs with little enforcement or even surveillance from the short-staffed BLM. Such vehicle use (including bicycles) is a main threat to keeping WSAs unimpaired and staying wild enough to be made Wilderness Areas by Congress. New leasing for oil and gas exploration is banned in WSAs, but leases issued before WSA selection are grandfathered in. However, potential for energy and mineral resources led to roadless areas not being recommended for WSA (even if such potential was not a legitimate reason—other reasons were found), and many WSAs were not recommended for Wilderness because of potential energy resources. Some ranchers have done their best to ignore interim management for WSAs they lease for grazing, and have bladed roads, dug stock tanks, laid water pipelines from springs, and so forth without asking for authorization from BLM.

Nonetheless, nonimpairment standards for WSAs until Congress signs off on their release from Wilderness designation are a great boon to conservationists. Because all WSAs—whether or not recommended by BLM for Wilderness Area designation—have to be kept unimpaired (undeveloped) until Congress releases them if it does not designate them as Wilderness, there is no need whatsoever for wilderfolk to accept a lousy bill that designates a few BLM Wilderness Areas but releases many.

Roadless Area Inventory

Even to long-on-the-job BLM staffers, a roadless area inventory of their lands was almost as much of a trip into the unknown as it was for wilderfolks. For one thing, professional BLM staff moved from state to state quite a bit. For another, some of the BLM land was truly the back of beyond. The wilderness review began in the Carter Administration and overall was run more truthfully and thoroughly than the Forest Service's RARE or RARE II undertakings, in part because FLPMA was much tighter and more straightforward on the BLM Wilderness Review than were the shady in-house guidelines the Forest Service had for the RAREs.



Nancy Morton captains kids through a rapid on the Green River, Desolation Canyon WSA, Utah
© Dave Foreman

New staff was hired to do the overwhelming job of fieldwork, mapping, and analysis. Overall, they were good, hard-working, young folks who liked wilderness and who took their work and mandate earnestly. Many were just out of college with outdoor recreation and resource management degrees. Some of them became strong wilderness backers, and several I worked with back at the beginning are still good friends. They had a big impact on

the culture of BLM because they did not come from ranching or mining backgrounds, and many of them were women. As some of them moved up the BLM ladder, they had even more of an impact. Conservationists and the new BLM Wilderness Review staffers often went together to find roadless areas or to see if they had “wilderness characteristics.” I checked out roadless areas all over New Mexico with BLM staff. I even did a four-day backpack through the quarter-million acre West Potrillo Mountains with Donita Cotter, the Wilderness Coordinator for the Las Cruces BLM District. We wanted to show the Las Cruces District Manager that it had “opportunities for primitive recreation or solitude.”

With BLM, there was somewhat less bickering over what a road was than we’d had with the USFS. The House Committee Report on FLPMA gave the definition:

The word “roadless” refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by passage of vehicles does not constitute a road.

Notwithstanding this clearly stated description of what was a road, there was still some head banging between wilderfolks and BLM managers (rarely Wilderness staff) on whether something was a road or just a way. Sometimes, the bickering became absurd (or at least funny): “Okay, was the rock moved out of the track by hand or a shovel?” “Is this little cut on the uphill side of this slope from tires or did a blade do it?”

Out of 175 million acres of BLM land in the lower 48 states, 49 million acres were identified as roadless.^[6] It is likely that 10 million or more acres were not identified as roadless that should have been. The Utah BLM, for example, identified a little less than 6 million acres of roadless areas in the late 1970s. One Utah BLM District Manager told his staff, “If in doubt, throw it out.” In an overwhelmingly thorough re-inventory in the late-1990s that brought in 500 trained volunteers under the leadership of Jim Catlin, the Utah Wilderness Coalition identified over 9 million acres that were both roadless and qualified for Wilderness.^[7] In New Mexico in the early 2000s, trained field workers for the New Mexico Wilderness Alliance found hundreds of thousands of acres earlier BLM and conservationists’ inventories had missed. Likewise, later fieldwork by conservation teams in Colorado and Nevada found many roadless areas earlier missed or overlooked.

Wilderness Study Area Selection

While there was sparring over the roadless inventory, overall BLM did a sounder job than had the Forest Service in the RAREs. Selection of Wilderness Study Areas was another deal, however. While the Wilderness staff wrote descriptions and analyses of whether roadless areas had wilderness characteristics and should become WSAs, those were edited and revised by higher-ups. The decisions to make an area a WSA were done up the chain of

command to each state director. Among the area managers, district managers, and state directors were some who had no personal feeling for wilderness or disliked it. Many shared the purity and quality mindset of their counterparts in the Forest Service, but at least no one argued that the alpine aesthetic should work in the drylands of the BLM. There were darn few glacial tarns and heaven-scraping peaks on BLM land (though one Colorado WSA has a 14,000 foot peak).

Nonetheless, there were some nasty little twists taken by antiwilderness BLM staffers to keep the WSA acreage small. Utah stands out. The BLM State Director in Utah, Gary Wicks (whom Interior Secretary Cecil Andrus seemed to think could do no wrong), did all he could to undercut the Wilderness review.^[8] Of the six million acres found to be roadless by the BLM, Wicks let only 3.2 million acres become WSAs. Debbie Sease, by then The Wilderness Society's BLM watchdog, flew over some of the WSAs and unselected roadless areas with Wicks. She would say, "Okay, the area on the right you've picked for wilderness study, but just next to it on the left, you say it doesn't qualify for wilderness study. It all looks the same to me. Why is the part on the left not suitable for wilderness study? Where's the line between them?" Wicks would say, "Because I say so." So it went as they flew over much of southern Utah.

Later it was shown that the dropped roadless areas met all Wilderness Act and FLPMA criteria but were overlain with mining claims—not a lawful handle for yanking roadless areas from wilderness study. Former BLM Wilderness staffer Clive Kincaid wrote that "no fewer than 60 instances have been discovered" where BLM's recommended boundaries excluded mining claims and other potential conflicts. That was the only ground for exclusion. Kincaid's article in *The Earth First! Journal* should have been on the front page of the *New York Times* and sent Wicks to the gallows, but by that time, wilderness-hater James Watt was Secretary of the Interior.^[9] Later in 1996-1998, the BLM reinventoried 3,107,070 acres beyond Wicks' picked Wilderness Study Areas in Utah and found that 2,606,990 more acres met the mark for Wilderness study, jacking up the Utah WSA acreage to 5.8 million.^[10] While this was a big step in the right way, the Utah Wilderness Coalition, after doing a new standard-setting field study, said 9 million acres of BLM land in Utah should be Wilderness.^[11]

In other states, BLM officials often held to old-fashioned yardsticks of Wilderness "quality" and "purity" and tossed wild and roadless areas because they were too flat in topography (not scenic enough) or too dry (not good for backpacking without water). I had the Wilderness Study documents from every state and found again and again that a desert area was rejected for WSA because it did not have enough "vegetative or topographic screening to provide opportunities for solitude." Never mind that when you are out in the middle of such a place there is likely not another human being for twenty miles. I wrote more than a few comment letters saying, "Flat is beautiful!"

Moreover, agency officials often overlooked ecological hallmarks as they emphasized primitive recreation or solitude opportunities. This was the reason for the four-day backpack Donita Cotter and I did in the waterless West Potrillo Mountains. We proved it had both primitive recreation and solitude opportunities. Though, to be truthful, I don't know of anyone else who has done that backpack in the thirty-five years since.

In Nevada, BLM cut a big area west of Searchlight from WSA consideration saying that it had no remarkable scenic features and was characterized by rabbitbrush. They failed to even note an outstanding ancient Joshua Tree Forest—one of the best in the US. Fortunately Nevada Senator Harry Reid liked Joshua trees and got the area designated as the Wee Thump-Joshua Tree Wilderness in 2002 after much criticism from the BLM and others that the area didn't qualify because it wasn't a WSA first.

Building a Grassroots BLM Wilderness Movement

Conservationists were a bit overwhelmed by ranchers, drillers, miners, and ORVers at the beginning of the BLM Wilderness Review. The great Alaska campaign and RARE II were sucking most of the energy out of conservationists, and there wasn't much of a constituency among conservationists for the Bureau of Land Management. We had little experience dealing with BLM and few wildlovers knew the land overseen by BLM. The challenge was to ride herd on the BLM as a few staffers put together regulations on how the review would be done, and



—at the same time—build a strong grassroots throng of dryland wilderness lovers and activists. Both those tasks fell mostly on Debbie Sease's shoulders. Moreover, the new executive director of The Wilderness Society, Bill Turnage, was busy tearing down the organizing team of Brandborg and Merritt and replacing it with cloistered economists and other "professionals" from Yale. In 1980 he fired Debbie along with nearly all the rest of the old TWS staff. She was left without an organization and a

Debbie Sease checking out
pictographs in a New Mexico
BLM roadless area, 1977
© Dave Foreman

paycheck. It is a testament to her character and true wilderness heart that she kept on working. First, she was given a temporary home by Friends of the Earth and then finally hired by the Sierra Club. Along with a handful of grassroots BLM activists, such as Jean Herzegh in New Mexico and Karen Tanner in Nevada, Debbie built a grassroots constituency for BLM Wilderness from the ground up. I don't write this because she was once my wife, I write it because I watched it at the time and because I have fat file folders with the raw history of that landmark organizing. From time to time, there has been an essential person for the conservation movement. From 1978 to the mid-1980s, that person was Debbie Sease. I truly don't know how badly we might have done on BLM Wilderness without her at the center of a web of only two-dozen or so hardcore activists in the West. Jim Eaton writes, "The nationwide BLM campaigns were developed mostly by volunteers. Debbie was perhaps the last professional staff person to direct such a grassroots campaign."[\[12\]](#)

Upshot

Notwithstanding weak Wilderness Area recommendations from BLM and some head-butting with mostly the brass in BLM, I have to say, overall the BLM ran their Wilderness review more fairly and above-the-board than the Forest Service ran the RAREs and their aftermaths to the late 1990s. Since *The Great Wilderness Divide* ends in January 2001, I won't go into all the dirty dealing by Bush's Interior Department with BLM Wilderness. Even so, many good BLM staffers did their best under Bush to do the job the law told them to do, just as they did under Jim Watt in the Reagan years. Below is a summary showing how BLM Wilderness has fared. It is a strong example of how a few folks can have a mighty influence.

Happy Trails,
Dave Foreman



In Desolation Canyon WSA, Utah

© Nancy Morton

BLM Wilderness Summary*

Total BLM acreage outside Alaska	175 million acres
Roadless Area acreage selected	62 million acres
Wilderness Study Areas designated	23 million acres
Wilderness Study Areas recommended for Wilderness	9,720,490 acres; 328 areas
Designated Wilderness by Congress as of 2014	8,710,640 acres; 221 areas**
WSAs still left under interim management	2,760,472 acres; 528 areas
TOTAL BLM Wilderness Areas and WSAs	about 21.5 million acres

(Note: state wilderness groups propose much more Wilderness than the 12.7 million acres of remaining WSAs. The Utah Wilderness Coalition alone proposes over 9 million acres of BLM Wilderness in Utah.)

*As of Summer 2014

** Mostly in California, Arizona, and Nevada, though nearly all Western states have some BLM Wilderness Areas.

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- [1] Doug Scott, *The Enduring Wilderness* (Fulcrum Publishing, Golden, CO, 2004), 84.
- [2] I recently learned more about Zeller and how his list came about, but that's a tale for another time.
- [3] Jim Eaton, email, September 23, 2014.
- [4] I draw on three books for the California Desert: Dave Foreman and Howie Wolke, *The Big Outside* (Harmony/Crown, New York, 1992), 156-158; Dyan Zaslowsky and T. H. Watkins, *These American Lands* (Island Press, Washington, 1994), 220-221; and James Morton Turner, *The Promise of Wilderness* (University of Washington Press, Seattle, 2012), 255-259.
- [5] Southwestern Idaho and some regions of Nevada have also had BLM Wilderness bills where some WSAs were released.
- [6] Secretary of the Interior James Watt dropped BLM lands in Alaska from Wilderness Review in 1981.
- [7] *Facts About America's Redrock Wilderness*, Southern Utah Wilderness Alliance, April 1999.
- [8] BLM, unlike the other federal land managing agencies, is administered on a state-by-state basis.
- [9] Clive Kincaid, "Something Rotten In Utah: The BLM," *Earth First!*, Vol. III, No. I, November 1, 1982.
- [10] Utah Wilderness Inventory 1999, USDI Bureau of Land Management.
- [11] *Facts About America's Redrock Wilderness*, Southern Utah Wilderness Alliance, April 1999.
- [12] Eaton, September 13, 2014.



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Pleistocene wildlife header graphic by Sergio de la Rosa Martinez

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