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Campbell, Robert Wellman, "WISH LIST WILDERNESS ENDGAME IN THE BLACK HILLS NATIONAL FOREST" (2010).
Great Plains Quarterly. 2629.
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WISHLIST

WILDERNESS ENDGAME IN THE BLACK HILLS NATIONAL FOREST

ROBERT WELLMAN CAMPBELL

In January 1979 Dave Foreman loosened his tie, propped his cowboy boots up on his desk, and brooded awhile on RARE II. In a second try at Roadless Area Review and Evaluation (RARE), the U.S. Forest Service had just spent two years deciding once and for all how much of its undeveloped land should be designated Wilderness. To Foreman, a Washington executive of the Wilderness Society, RARE II tasted of bitter defeat, and he lonesomely “popped

the top on another Stroh’s” as he brooded. The Forest Service had just recommended increasing its Wilderness acres from 18 million to 33 million, or about a sixth of its 190 million acres. Foreman wished for much more, and he regretted that conservationists like himself had been moderate in their demands and tactics. By 1980 a disgusted Foreman had “loosened his tie” all the way back to New Mexico, out of the Wilderness Society, and into Earth First!, a radical new environmental group that was best known for advocating sabotage of logging and construction projects. As Foreman told this story in his autobiography, *Confessions of an Eco-Warrior*, RARE II was the last straw.¹

Key Words: Beaver Park, Black Elk Wilderness, Norbeck Wildlife Preserve, RARE II, South Dakota, U.S. Forest Service

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Around the same time, South Dakota congressman Jim Abdnor also held a RARE II postmortem, but in a lighter mood. Meeting with environmental activists in his Rapid City office, including Sierra Clubber Sam Clauson, who related this story years later, the Republican congressman lit a cigar, put his feet up on his desk, and asked without much care, “Now what the hell are we going to do about this wilderness thing?” The Black Hills, lying in Abdnor’s “West River” district of western South Dakota, were to get their first official

Wilderness. There was some question how to name it—after a military explorer, a Lakota holy man, or a conservationist governor—and though Abdnor was not enthusiastic about an Indian name, he could accept anything. RARE II had come out satisfactorily for Abdnor, but he had bigger fish to fry as he worked toward his 1980 campaign to unseat Senator George McGovern.²

Two very different reactions from two different perspectives. Dave Foreman, having little to do with South Dakota, typifies the national reaction: angry rejection from both sides. But the reaction in the Black Hills region was probably closer to Abdnor and the environmentalists: some interest, some controversy, but also some rather cool satisfaction. This article looks at RARE II from the latter perspective, to shed a different light on the sausage-making of wilderness legislation.³ This illuminates two issues in particular. First, as a very small state in both population and in attitude, South Dakota provides a useful example of state-federal tension in environmental politics. Who would call the shots in this case, D.C. or S.D.? Second, as a western area developed to a level more typical of the East and of the nation as a whole, the Black Hills provide a view into how a postindustrial America might think about the nature in its own well-worked back yard. The question is whether we believe in redemption for land—whether nature heals or nature is what was there before the wound. Do we believe our land can revert even to “go-back wilderness,” or do we see development as a one-way street?⁴

RARE II was meant to settle the political contest that had been fought over wilderness since 1964, as the endgame to decide once and for all the winners and losers among federal lands. RARE II was a modified version of the process dictated by the National Environmental Policy Act of 1970, which by the time of RARE II was already a well-practiced set piece within the broader politics of environmentalism. These NEPA contests were not just about the specific policy questions at hand; they were also strategic, symbolic plays in the never-ending contest over the nation's

public lands. Partly for this reason, the case of the Black Hills is interesting less for its unsurprising result—Wilderness status for the Norbeck Wildlife Preserve—than for how the political game played out.

PREGAME (1874–1977)

The historical background of the Black Hills is beyond our scope, but a few points are relevant. The first is just how developed the Black Hills were. George Custer's 1874 invasion triggered a powerful, long-term transformation of the landscape. Immigrants were busy building mines, towns, farms, sawmills, and most importantly, roads for almost a quarter century before the creation of the Black Hills Forest Reserve in 1897, later renamed the Black Hills National Forest.⁵ At that point the federal government assumed control of a working forest, an “estate with many tenants” who certainly resented Democrat Grover Cleveland's eleventh-hour proclamation creating the reserve.⁶ The lands they owned are still private inholdings today. Federal timber sales began immediately, and most of the national forest has been repeatedly logged. These “Hills,” though actually old, weathered mountains, have a moderate topography that makes access to timber quite easy. And plentiful snowfall and rainfall in the spring and early summer make the Black Hills a natural nursery for abundant ponderosa pine.

So this was, and is, a domesticated place. And yet, like many places, it can give you a fair impression of wildness. Once off the highway the slopes block your sight, the pines hush your hearing, something hits your nose the right way, and there is some opportunity to get lost if you cooperate. A unique mix of plants grows in the Black Hills: northern, western, and eastern forest species overlap at the far ends of their ranges, blending with the short-grass prairie that flows up the valleys from the plains and becomes quite tallgrass in the Black Hills' wetter climate.⁷ And people did act to preserve these natural qualities, most notably Peter Norbeck, South Dakota's conservationist governor and senator. Norbeck created Custer

State Park, one of the largest state parks in the nation, as well as what's now called Norbeck Wildlife Preserve.⁸ The Preserve is on national forest land and includes Harney Peak, the tallest point east of the Rockies at 7,242 feet.

Since World War II the Black Hills economy has been an interesting contradiction of tourism and extraction. Winnebago campers and logging trucks; the faces at Rushmore and the open pit at Homestake Mine; the pretty and the prolific, tightly intertwined. These same contradictions pulled the U.S. Forest Service in opposite directions. Congress formalized this tug-of-war in the Multiple Use Act of 1960 and the Wilderness Act of 1964. The Wilderness Act gave the Forest Service ten years to recommend which of its wild lands should be managed as official, "big W" Wildernesses. (Only acts of Congress could actually create them.) The Forest Service met this deadline with an effort called the Roadless Area Review and Evaluation, or RARE. But its results were criticized, legally challenged, and ultimately discarded.

Jimmy Carter, an avowed conservationist, took office in 1977. He appointed Rupert Cutler, a former academic and Wilderness Society executive, as the assistant secretary of agriculture with responsibility for the Forest Service. Cutler disliked the slow, uncertain process of piecemeal Wilderness designations, which pleased neither side. He planned a new review with consistency, proper planning, and public involvement. He wanted to move as many lands as possible to either official wilderness or nonwilderness use. When he announced his ambitious plan in early 1977, wilderness advocates derisively nicknamed it RARE II, but the Forest Service quickly Yankee-Doodled this nickname as the program's official title.⁹

So from Custer to Cutler was just over a century, with no lands in the Black Hills designated as Wildernesses. Even the Norbeck Preserve had roads, grazing permits, fences, campsites, cabins, inholdings, and even a Jeep concession selling rides to the top of Harney Peak. The Black Hills was (to paraphrase the act itself) an area where the earth and its

community of life were untrammelled by the Wilderness Act of 1964, where preservation itself was a visitor who did not remain. Now, for almost exactly two years, the Forest Service would look again, in a process divided like an athletic contest into four quarters, in this case lasting six months each. This sounds like a long time, but for evaluating tens of millions of acres across the continent it was an ambitious schedule.

FIRST QUARTER: INVENTORY (SPRING TO FALL 1977)

From late spring to fall 1977, Black Hills National Forest officials inventoried the region to determine what "roadless and undeveloped areas" existed. By late July, Rangers and Supervisors were revising the list, phoning each other as they pored over maps. By August the Forest was soliciting public comment through news releases and at least two informational meetings in Sundance and Rapid City. Citizens were asked to critique the draft inventory and to suggest criteria for judging the roadless areas. The Black Hills Group of the Sierra Club submitted a list of fifteen roadless areas; fourteen were rejected and one (Sand Creek) was added to the list of candidates.¹⁰

Nationally, 227 of these "workshops" attracted 17,000 people, and with all the publicity, spurred more than 50,000 public comments. But the Black Hills National Forest received only ninety-five written responses. Those who did show at the Black Hills meetings were given extra time to speak. One Forest official noted that since RARE I had skipped over the Black Hills, residents had skipped that round of public involvement and controversy in wilderness issues.¹¹

During September 1977 the Forest office in Custer and the Regional office in Denver together evaluated the comments, finalized a list, and forwarded it to Washington and the press. Where RARE I had found no roadless areas, RARE II found four: two in Wyoming and two in South Dakota.

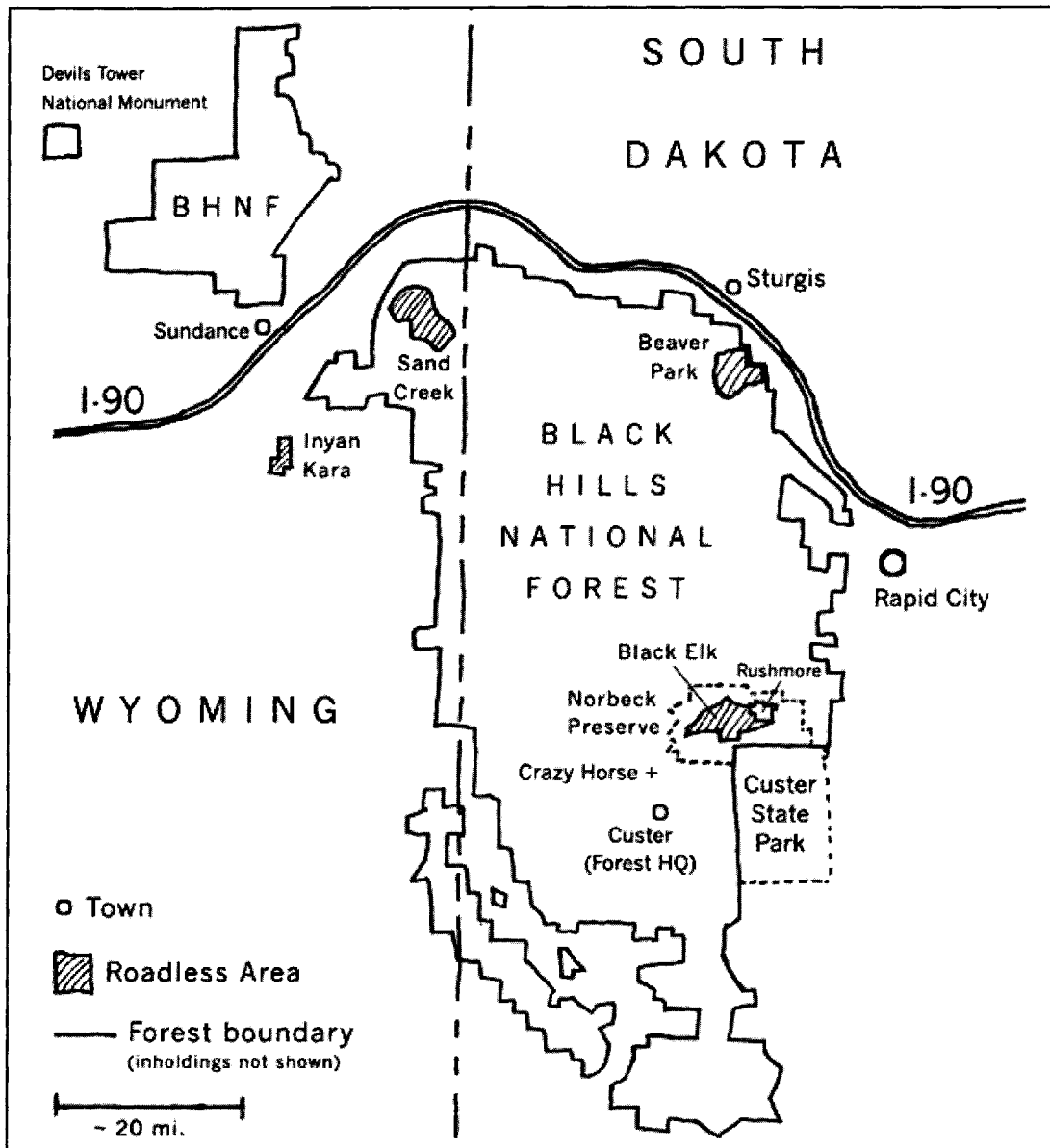


FIG. 1. Area map. Map by the author.

Inyan Kara Mountain was by far the smallest of the four (Fig. 1). This 6,400-foot peak is a western outlier of the Black Hills with two square miles of Forest Service land around it. There were no roads through this area, or even public roads to this area. While Devils Tower, thirty miles northwest, is a more spectacular

and well-known landmark, Inyan Kara (probably corrupted Lakota for “stone maker” or “the stone is made”) was part of local lore as the point of several Indian-European encounters. On July 22, 1874, Custer’s expedition camped four miles to the east, and the next day Custer and some of his men climbed the mountain

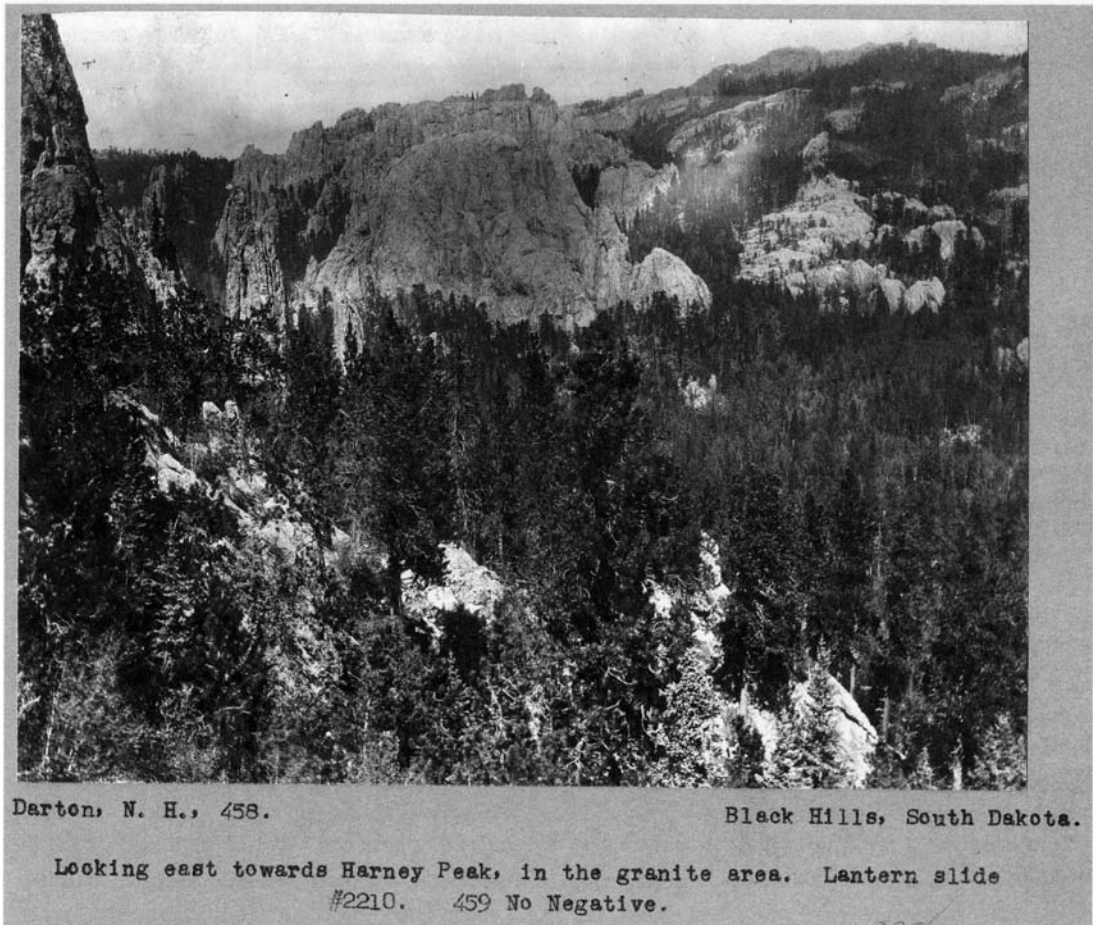


FIG. 2. Looking east toward Harney Peak. Nelson Horatio Darton, 1898. Courtesy of U.S. Geological Survey Photographic Library.

itself. While waiting for the haze of Indian fires to clear, they chiseled “74 Custer” into stone, as is visible today.¹²

Sand Creek was the biggest of the four, about nineteen square miles of steep, forested land just inside Wyoming. Lying near the edge of the Black Hills dome, in the northwest corner of the national forest, this area dropped almost a half mile over its five-mile run, making it hard to log profitably. It was locally popular for hunting, snowmobiling, and cross-country skiing.¹³

Beaver Park also lay on the edge of the national forest, but in the northeast near the busy Spearfish–Rapid City corridor, close to Interstate 90 and the town of Sturgis. Its name,

like that of the Holy Roman Empire, was a tangle of historical irony. The Forest Service named this densely forested “roadless area” after one of its few open areas, located at a junction of two old roads. The area’s gulches had only intermittent streams, and so presumably no beavers. Instead, local tradition traced the name to a Mr. Beaver, owner of a sawmill near the park.¹⁴

Norbeck had a different kind of busyness. Its sixteen square miles lay around Harney Peak, and in the center of the Black Hills’ main tourist attractions. Mount Rushmore was immediately northeast, and the enormous Crazy Horse sculpture to the southwest. To the south

Location			Wildness			Commodities					DEIS Alternatives					
Area name	State name	Area size (gross, in DEIS)	Under special classification	Bailey-Kuchler Ecosystem	W'nness Attribute Rating	Timber: growing boardfeet	Grazing: animal use mos.	Recreation: visitor days	Minerals: producing?	Minerals: potential?	C: Commod (w'nness qual)	E: NWS goals: low	F: NWS goals: med	G: NWS goals: high	H: Local issues/politics	I: W'nness qual (commod)
name	name	acres	acres	no.	4-28	MMBF	MAUM	MRVD	y = yes		w = wilderness					
Inyan Kara	Wy.	1,280	1,280	0311016	15	11.5	0.1	1.5	y	y	w					
Sand Creek	Wy.	12,400	0	0311016	14	105.0	0.9	4.0	y	y		w	w			
Beaver Park	S.D.	5,040	130	0311016	20	40.0	0.1	1.3		y	w	w	w			w
Norbeck	S.D.	9,400	9,400	0311016	21	55.0	0.0	7.0	y	y	w	w	w	w	w	w

FIG. 3. Area attributes and draft environmental impact statement alternatives. Figure by the author.

and southeast lay the popular Custer State Park with its scenic Needles, tourist highways, recreational lakes, and other attractions. The Norbeck roadless area lay inside the Norbeck Wildlife Preserve, created in 1920 and named for the hallowed Senator Norbeck.

For the next year and a half these four pieces of ground were debated, defended, and disparaged, first by the Forest Service.

SECOND QUARTER: THE FOREST SERVICE EVALUATES (FALL 1977 TO SPRING 1978)

Soon after the four areas were chosen as candidates, Forest Service staff were at work appraising them in several ways. In the winter of 1977–78 the local and regional offices were assigned the task of quantifying the commodity potential, wildness, and political popularity of each candidate area. These data became the basis for all future stages of the RARE II process; they were used to produce the Forest Service's policy alternatives, to spur public comments, and ultimately to justify the Forest Service's proposal to Congress.

Commodity values: National forests produce wood but also livestock forage, water, energy and minerals, wildlife habitat, and human

recreation. Documenting these commodities is what foresters do, so for the most part commodity assessments for RARE II were nothing new (Fig. 3). One area stood out: Sand Creek. It had much more total timber than the other areas, and its timber was already planned for harvest. It also fed many times more cattle than the other areas combined.

Wildness: How on earth do you quantify wildness? As in any theological question you return to a sacred text, in this case the Wilderness Act of 1964. Its wording was scrutinized for guidance, and four phrases were picked out as criteria. A Wilderness's four "requisite attributes" would be natural integrity, apparent naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive recreation. The Forest Service's Wilderness Attribute Rating System (WARS) rated each attribute from 1 to 7 and added them; thus a perfect WARS score was 28. The average WARS score nationally was 18.48. The Black Hills National Forest's scores are in Figure 3. South Dakota's areas (Norbeck and Beaver Park) led with 21 and 20, while Wyoming's areas (Inyan Kara and Sand Creek) lagged at 15 and 14.¹⁵

Social analysis: The roadless areas' political values (the Forest Service called them "social")

Does this RA stand for anything special in the minds of people?	Inyan Kara	Sand Creek	Beaver Park	Norbeck	Legend	
	locally regionally nationally	y y y	y		y = yes blank = no	
Interest group					USFS officer's perception	Symbol Value
Timber	m	M	M	w	Wilderness strongly favored	W 7
Range (cattle, sheep)	M	M	M	/	Wilderness moderately favored	W 6
Water (municipal, ag)		M	m		Wilderness slightly favored	w 5
Minerals	m	M	m	M	Split opinion	/ 4
Energy (gas, oil, coal, geoth., uranium)	m	m	M	m	Multiple use slightly favored	m 3
Motorized recreationists	m	M	m	w	Multiple use moderately favored	M 2
Nonmotorized recreationists	w	M	/	W	Multiple use strongly favored	M 1
Hunters	m	M	M	/	No real opinion expressed	(blank) none
Fishermen				w		
Nongame						
Environmentalists/preservationists	w	W	W	W		
Chambers of Commerce, civic groups	M	M	/	W		
Elected officials	M	M	/	W		
Scientific / biological / research				W		
Officer's perception: local sentiment	M	M	m	W		
Officer's perception: nonlocal sentiment	M	m		W		
Average support for Wilderness (1-7):	2.6	2.1	3.1	5.2		

FIG. 4. Social analyses. Figure by the author.

values) were even harder to quantify than wilderness. Again the task was approached by breaking it up. The heart of the social analysis was a list of interest groups; unnamed Forest officers (apparently at the District level) estimated, in narrative and a numerical scale, how badly each group wanted each roadless area to be designated one way or the other, and why (Fig. 4). The order of support echoed WARS: Norbeck, Beaver Park, Inyan Kara, Sand Creek. But in this case the big gap fell between Norbeck and the rest; people apparently did not appreciate or desire Beaver Park's wildness.¹⁶

The narrative portion mostly explained the obvious: interest groups opposed Wilderness designation for any area that they wanted to benefit from nonwilderness management. Many of these were anticipated future benefits, but some, such as grazing, were already being enjoyed. Keep in mind that these were Forest Service perceptions; the social analysis essentially described what political flak the Forest Service expected from various allocations. This analysis reveals several points: that the envi-

ronmentalists were politically isolated but their opponents were well allied, that public reaction was really about wilderness in general and not specific areas, and that the Forest Service revealed a particular view in the terms it used.

First, on the term "multiple use": The Multiple Use-Sustained Yield Act of 1960 expressly stated that "multiple use" included wilderness. Environmentalists likewise stressed that multiple use never meant "every use on every acre," and that wilderness itself served various purposes. For these reasons the Forest Service was often careful to speak of wilderness vs. "other uses." But notice that in setting up this numerical scale, the Forest Service placed "wilderness" and "multiple use" at opposite poles. South Dakotans, including Representative Abdnor, often said "multipurpose" instead of "multiple use," a subtle distinction; a drawer of tools is not multipurpose but a single 5-in-1 pocketknife is. In practice, the phrases were used interchangeably as meaning "not wilderness." Only a "Wise Use Act" could hand preservationists a deeper rhetorical defeat.¹⁷

Second, outside of Norbeck, “environmentalists/preservationists” had few allies. Nonmotorized recreationists for Inyan Kara were the only other pro-wilderness group in the table (and “little interest expressed” was noted even here). Potential allies in research, fishing, and nongame wildlife were almost unheard. Environmentalists were also perceived as spreading their support, whereas timber and motorized recreation were sometimes noted as picking and choosing, accepting Norbeck as a “compromise area . . . to get what they want in other areas.”

But we should note here that generalized, not site-specific, reactions were the rule. Sand Creek’s grazing was ten times greater than Inyan Kara’s, but the same reaction from ranchers was expected. In fact, those two areas had the most and least total resources, but their overall support was similar.

Finally, in contrast to the isolated environmentalists, the social analysis portrayed the commodity interests as tightly allied. In this account city hall and the Chamber of Commerce were deemed identical in their sentiments. For “elected officials,” three times the unnamed Forest official simply wrote, “Same as [Chamber of Commerce and civic groups].”

The officer’s “overall” perceptions of local sentiment closely match the Chamber–town hall consensus. These were sharper than the (admittedly simple) averages shown in Figure 3, with Norbeck rated high and the Wyoming areas at the lowest level. Beaver Park was again in the middle. The officer also added notes to each, labeled “Sense of Local Control”:

[Norbeck:] The local public presently views the R.A. as a “Wilderness” and wants it to remain that way. Unless the area is designated as Wilderness[,] or M.U. with stringent controls on development and vehicular travel, the local public will feel that Government and outside pressure groups have made the decision and their input was not used.

[Inyan Kara, Sand Creek, and Beaver Park:] General feeling . . . [is] that Gov’t will make

the decision regardless of local input. Gov’t is influenced by big city or eastern pressure groups who know nothing of the local situation. This feeling will be reinforced if the R.A. is designated as wilderness.

In other words, outsiders are environmentalists who want new Wildernesses; locals want Norbeck designated only because it is already an unofficial wilderness anyway. Local Forest Service personnel may have shared this sense, but the documents are silent on tensions within the Forest Service. The major “interest group” omitted from the social analysis was, of course, the Forest Service itself.

By February of 1978, almost a year after the start of RARE II, the Black Hills National Forest had finished its analyses and shipped them up the line to Denver and Washington. Other information trickled in; in March Forest Service lawyers opined on Norbeck’s status, and in June the Department of Energy assessments circulated. In June the Forest Service published the RARE II draft environmental impact statement as required by law. The main statement, a thick, dry tome, formally proposed the national program, while state supplements described individual areas.

The task of a draft environmental impact statement is to describe an area, propose alternative plans for it, and assess how each alternative would change the area, both physically and socially. Figure 3 shows how each alternative allocated the Black Hills areas. Three alternatives (E, F, and G) “rounded out” the National Wilderness Preservation System with low, medium, and high levels of ideal landform, ecosystem, and wildlife representation. Two alternatives (C and I) took the obvious tack of balancing wilderness benefits against commodity costs. And one alternative (H) followed local politics.

Unlike an ordinary environmental impact statement covering one project in one place, this national or “programmatic” environmental impact statement served less as a factual analysis and more as an enormous paper ballot.

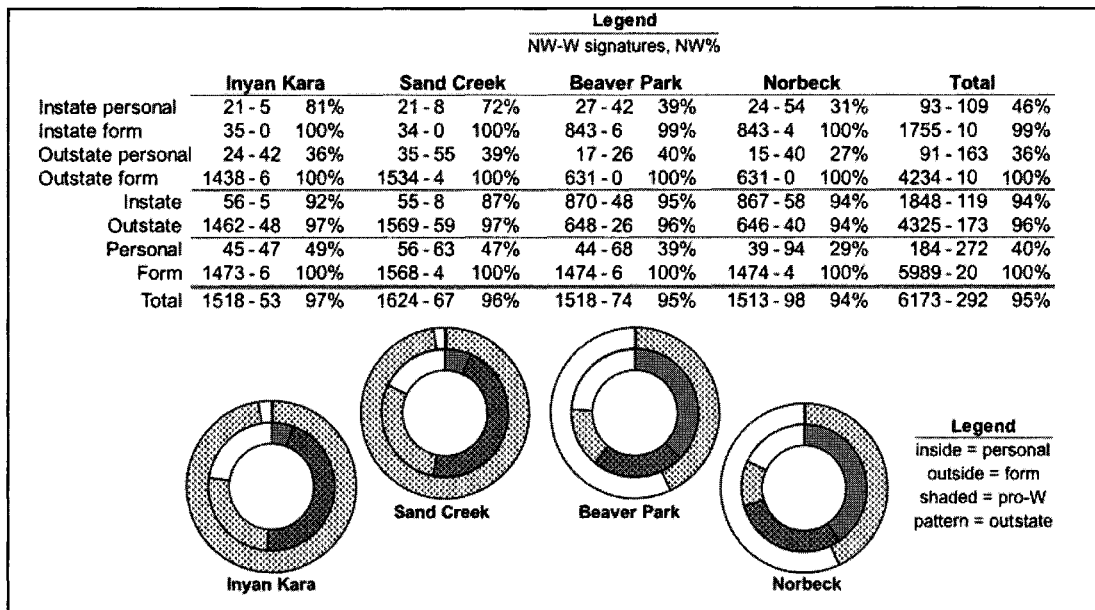


FIG. 5. Public comments. Figure by the author.

THIRD QUARTER: PUBLIC COMMENT
 (SPRING TO FALL 1978)

And so the process had been plopped, heavily, back into the public's court. Forest Service chief John McGuire described this phase of RARE II as a kind of studious outing: "The public will have the field season of 1978 to check the accuracy of these data and present their recommendations." Some of this civic tramping of the grassroots may have occurred, but it was lost in the publicity machines that buried the Forest Service in bales of homogenized "astroturf" balloting. For all U.S. roadless areas, the 1977 inventory round of public involvement reaped 50,000 comments. By contrast, the 1978 harvest topped a third of a million signatures. A special clearinghouse was set up in Salt Lake City to count all the comments and summarize their contents. Forest Service personnel from around the country, including the Black Hills, were moved temporarily to Salt Lake to meet the November 1 deadline for processing comments.¹⁸

Regarding the Black Hills areas, after getting thirty-four comments in the inventory

round, the Forest Service probably heard from over 1,500 people in this round. (Since most people commented on all four areas, over 6,000 "signatures" were recorded.) Comments ran more than 20-to-1 against Wilderness designation. Ninety-three percent were form letters (petitions, preprinted forms, etc.). Figure 5 depicts the comments by origin, format, and preference.

The most obvious pattern is that Inyan Kara and Sand Creek were twins, as are Beaver Park and Norbeck. As the internal social analysis predicted, overall political response was general, not site-specific. Personal letters favored Wilderness by about 3 to 2, but form letters almost purely opposed Wilderness for every roadless area, and the forms produced far more "signatures." The Salt Lake processors noted that pro-Wilderness letters tended to name specific areas but anti-Wilderness letters named entire states or forests.

Where did the letters about the Black Hills National Forest come from? The Forest Service recorded whether each comment came from inside or outside the state of the area it commented on. For this Forest, split between two

states, this requires a bit of syllogism. First, the Wyoming areas received very few comments from Wyoming. Second, it is very unlikely that a South Dakotan or Wyomingite would comment on areas lying just across the border but not on the areas within their own state. So South Dakota's outstate letters were not from Wyoming. Therefore all four areas must have received hundreds of letters from outside the two-state area. But from where?

Among the stacks of cards and letters, the staff in Salt Lake noticed over a dozen organized campaigns targeted at the Rocky Mountain Region (Colorado, Wyoming, South Dakota, Nebraska, and Kansas). Almost all of them opposed Wilderness. Two campaigns were Wyoming-wide. Another "extensive post card form campaign" supported nonwilderness for all four Black Hills areas; many of these cards were hand-annotated: "especially Sand Creek." Another card campaign targeted Sand Creek alone. A "large number" of forms came from Chicago, in four versions for four of the Region's Forests, including the Black Hills National Forest. These were formatted like ballots with checkboxes, but they were almost uniformly checked nonwilderness.

Several states had pro-Wilderness campaigns ("Alternative W"), but apparently South Dakota had none; Wyoming did, but proposed nonwilderness for its two Black Hills areas.

The public comments partly belied the Forest Service's social analysis. In this stage locals did oppose Wilderness, but for all four areas. And there were indeed "outside . . . big city or eastern" pressure groups, but far from being environmentalist, they were almost purely anti-Wilderness.

FOURTH QUARTER: FOREST SERVICE
RECOMMENDATIONS
(NOVEMBER–DECEMBER 1978)

The Forest Service wanted its RARE II recommendations to be ready when the new Congress convened in January 1979 so that areas allocated to nonwilderness could be "released" and utilized that year. To do this it

had to start acting before the October 1, 1978, deadline for public comments. In September the chief of the Forest Service directed his Regional Foresters to adjust boundaries of the areas if they sensed that doing so would "minimize resource conflicts." This meant *removing* commodity areas from proposed Wildernesses, since nobody opposes a proposed Wilderness because it is slightly too small. The Black Hills areas did not change.

Assistant Supervisor Frank Smedley handled RARE II for the Black Hills National Forest, as head of Lands and Recreation. In late October 1978, as soon as the public comments came in from Salt Lake City, he met with his District Rangers in the basement of the Supervisor's office in Custer to review the comments and the previously gathered data. By the 27th he was in the Regional office in Denver conferring with officials from the Regional office, state governments, and other national forests.

Regional Forester Craig Rupp had only about two weeks to make decisions on almost 400 roadless areas. Even the Forest Service admitted that RARE I had lacked consistency between Regions, so for RARE II, every Region had to follow a standardized decision-making process (Fig. 6). This new process did not consider one area at a time, and it did not choose one alternative from the draft environmental impact statement and apply it across the entire Region. Instead, the new process was a kind of algorithm that combined Alternatives C and I (basically, the alternatives that emphasized commodity values and wilderness values), and then ran that result through a series of "filters" that could move areas from one category to another. These filters were a fascinating ranking of Forest Service priorities, since obviously the later the filter the greater its power. For example, Alternatives C and I disagreed on three of the Black Hills areas, so they went to the middle status of "Further Planning"—but that didn't matter because the next step put all four areas into nonwilderness anyway, because more than 90 percent of public comments had wished so. In later filters, Beaver Park and Norbeck moved to Wilderness in order to put

Who, when	Steps in decision-making process	Inyan Kara	Sand Creek	Beaver Park	Norbeck
DEIS, June 1978	Draft Environmental Impact Statement, Alternative C: Obtain high resource outputs, but consider high W qualities Draft Environmental Impact Statement, Alternative I: Obtain high W quality, but consider high resource qualities	W	NW	NW	NW
Regional Forester, Denver, November 1978	"Analysis Base": If C and I agree, that designation. If C and I disagree, further planning	FP	NW	FP	FP
	<ol style="list-style-type: none"> 1. Public comment: If >70% signatures agree, that status 2. Regional Forester override: If #1 misrepresents local opinion, move area one level; document compelling reason 3. National Wilderness System: Meet mid-level ecosystem, accessibility targets, low-level landform and wildlife targets 4. National Grasslands: Remove from W unless needed for #3 (No National Grasslands in Black Hills) 5. Wilderness Attribute Rating: Move to W: (1) top 5% of Region's WAR scores, and (2) FPs in top 30% 6a. Mineral/energy scores: NW if any 100 score. W-->FP if a score >80, or two scores >70 6b. Community employment/stability: NW if Regional Forester shows W would have "significant adverse impact" 7a. 1974 Resources Planning Act's wilderness goal: Move NW to FP until W+FP meets Region's acreage quota 7b. Other RPA goals: Move W to FP until Region can meet goals for timber, range, recreation etc. 8. Regional Forester: Change boundaries/designation for compelling reasons of public desire, professional judgement 	NW		W	W
Chief, RFs, USDA	9/10. National review: Re-evaluate designations against original Criteria, Alternative C/I. Quality control for moves 1-8. Finally, USFS/USDA (i.e. Chief and Cutler) make changes according to perception of national needs and desires			W	NW
	USDA recommendation: 4 January 1979				
	President's proposal to Congress: 16 April 1979			NW	W
	Congressional action: P.L. 96-560 signed 22 December 1980				

Blank = no change. W = designate as Wilderness. FP = hold for future planning. NW = Nonwilderness

FIG. 6. Decision-making process. Figure by the author.

some Black Hills Pine Forest into the National Wilderness Preservation System, but then both areas dropped to Further Planning because they had mineral potential. And that was the Region's recommendation: Further Planning for the two South Dakota areas, and nonwilderness for the two Wyoming areas.¹⁹

In Washington, during the week of Thanksgiving 1978, Forest Service chief John McGuire and the Regional Foresters met with Assistant Secretary Cutler and other Department of Agriculture staff to make the final Forest Service recommendations. McGuire and

Cutler were supposed to consider "national issues and needs, such as energy," as McGuire later said. The United States was suffering through inflation and an energy crisis, and the national forests were to contribute more oil and timber in order to bring energy and housing costs down. So one of their main goals—the original intent of RARE II, after all—was to move Further Planning areas one way or the other.²⁰

McGuire and Cutler moved Beaver Park to Wilderness and Norbeck to nonwilderness. They did so for a commodity: not energy or

timber, but game animals. The Forest Service acted to defend its own decades-long interest in the Norbeck Wildlife Preserve, namely the “production” of wildlife. As a Forest official told the *Rapid City Journal*, Norbeck was passed over “because Federal law already mandates its preservation for wildlife,” implying that Wilderness designation was superfluous. (As we will see, the Forest would eventually claim that Wilderness status would *conflict with* Norbeck’s wildlife mandate.) And once Norbeck was eliminated, Washington still wanted some Black Hills ponderosa forest in the wilderness system, so Beaver Park was in.²¹

The final recommendations of Cutler and the Forest Service, unaltered by the secretary of agriculture, were announced on January 4, 1979, with the release of the final environmental impact statement. Ninety days of political “interagency review” was to follow before the president would formally send his requests to Congress, but the Forest Service’s process—RARE II itself—was over.

SUDDEN DEATH: THE 96TH CONGRESS (1979–1980)

South Dakotans immediately threw out the Forest Service’s final RARE II recommendation of Wilderness for Beaver Park and nonwilderness for Norbeck. Ninety days later, when the president sent his final list to Congress, Norbeck was on it and Beaver Park was out. Let us look at how this reversal came about.

The *Rapid City Journal* had immediately turned against Beaver Park. Paul Riley, outdoors reporter for the *Journal*, filed stories such as “Beaver Park Walk Shows Little Signs of Wildlife” and “Wilderness Area Rates High for Mineral Potential.” “The Forest Service has chosen Beaver Park,” Riley summarized in a news article, “even though the Norbeck area scored higher on the wilderness attribute rating system, showed no potential for gas and oil and had stronger local support.” He combined this position on Beaver Park with criticism of wilderness in general, writing in an editorial that “roadless means lifeless,” because the forest

needed management to keep ponderosa in check.²²

State politicians, many of them just taking office, also rejected the Forest Service decision. This included the new governor, his Wildlife, Parks, and Forestry Commission, and the entire congressional delegation.²³

The local Sierra Club, which had led the pro-Wilderness cause back in 1977 by recommending fifteen roadless areas, now split over what to do about the last two chances. The club strongly supported Norbeck, according to the *Journal*, but officially took no position on Beaver Park because some members wanted to push for two Wildernesses while others worried that Norbeck might be left out.²⁴ Norbeck had been the chapter’s founding cause; they had formed in 1972 as the ad hoc Committee for Preservation of Harney Peak to defeat a proposed tramway. Conservationists had also opposed a sale of timber from the Preserve in the early 1970s.²⁵ By 1979, according to a later Forest Service document,

[p]robably the recommendations for Beaver Park and Norbeck would have stood as presented in the EIS [environmental impact statement] were it not for the Sierra Club in Rapid City. Members thought it would be nice to have a Beaver Park Wilderness, although they had never considered the possibility, but they were disappointed that the Norbeck area was not to be accorded the protection of wilderness designation. Working with the procedure “to bring pressure on Bergland,” members began a strong lobbying effort, sponsored a letter-writing campaign, and ultimately persuaded Governor Wollman, Senators McGovern and Abdnor, and Congressman Abourezk to support wilderness designation for Norbeck.²⁶

This unsigned document has some chronology wrong, and may overestimate the club’s influence on elected officials, but it is consistent with the *Journal’s* account. One chapter member later said that they reacted with “a sigh of relief” to the April 1979 decision to des-

ignates only Norbeck. “We should have fought hard for both of them,” said founding member Sam Clauson in hindsight, but they were green and did not appreciate how final RARE II would prove to be—there had been a RARE I, after all, then RARE II, so maybe there would be more.²⁷

And the local Forest Service—what was their attitude? The documents leave only hints. The Forest’s public information officer distanced the local Forest Service from the initial announcement: “It’s important to remember that [this] decision came out of Washington.” The big Thanksgiving meeting in Washington contravened the Black Hills public’s well-documented preference by choosing Beaver Park, but it is unclear where in the Forest Service this impulse originated—in Custer, Denver, or Washington. Wherever it arose, it was overcome by public pressure between January and April 1979. A later Forest document said merely that in this period “the anticipated management conflicts were found not to exist.” But these “conflicts” did exist, and would be an issue through this Wilderness’s legislative history.²⁸

Making a Wilderness requires an act of Congress, and this act proved just slightly tricky. Carter’s RARE II request was not handled in mass as an omnibus bill, so South Dakota’s western congressman and senior senator each submitted bills covering South Dakota only. Once Norbeck had been chosen, two issues complicated this legislation: how to reconcile the new Wilderness with the existing wildlife Preserve and what to name the Wilderness.

The minor issue was the name. The roadless area had been “Norbeck,” or “the Norbeck Core,” after the Preserve. Once it was a proposed Wilderness, the Forest Service distinguished it from the Preserve by calling it Harney Peak Wilderness. But Senator McGovern introduced a bill in September 1979 naming it Black Elk Wilderness. This Lakota holy man was made famous by John Neihardt’s book *Black Elk Speaks*, which had just been staged as a play at the Kennedy Center and was on its way to



FIG. 7. The trail to Harney Peak, ca. 1920s. Courtesy of Black Hills National Forest Historical Collection, Case Library, Black Hills State University.

Broadway. Fully half of McGovern’s floor comments had to do with Black Elk and his visit to Harney Peak (“A spot, I might add, at which I chose to rejuvenate myself after the exertion of the primaries and Democratic Convention by which I was nominated as a candidate for the Presidency”). It was on Harney Peak, in the climax of Neihardt’s book, where Black Elk recited “Black Elk’s Prayer” and was rewarded with an affirmative rain shower. Abdnor held to “Harney Peak Wilderness,” noting that “a large majority” of his constituents preferred that name. The Forest Service explicitly took no position.²⁹

The more substantial issue in the legislation was how to reconcile the existing Wildlife Preserve with the new Wilderness. The two seemed surprisingly incompatible.

In 1920 Congress had declared the Preserve “set aside for the protection of game animals and birds and . . . a breeding place [therefor].” All uses, even wilderness, were eventually judged against that single standard. A 1927 master plan, in effect until the 1970s, called for fire suppression and for timber cutting aimed

at scenic enhancement, brush disposal, thinning, and insect and disease control. Grazing was allowed with no increase in herd size. Campgrounds, picnic areas, and cabins were permitted when deemed consistent with wildlife goals. A stone lookout tower adorned the peak. Hunting was allowed and regulated by the state. Congress even permitted the state "to erect and maintain a good substantial fence, enclosing [the Preserve] in whole or in part," but no such fence was ever built.

The exception to all this management was the Upper Pine Creek Research Natural Area, 1,190 acres of "virgin timber" just off the peak, set aside since 1932 as a scientific comparison to cutover lands, "so that present and future generations can see it as it was when the Indians used the Black Hills for their hunting grounds."³⁰

How would Wilderness designation affect this use of the land? The Forest Service persistently couched this issue in legal language, even though the real conflict was not legal. Congress had created the Preserve, and Congress could alter or abolish it at will. The whole point of a Wilderness designation, after all, was to supersede previous land-use plans.

Back in 1978, during the preparation of the draft environmental impact statement, the Forest Service's Office of General Counsel had advised Black Hills National Forest officials that "[i]t is conceivable that wilderness designation of the refuge or a portion thereof could be contrary to the intent of the legislation establishing the sanctuary in that activities to further wildlife and habitat therefore [sic] may be prevented by wilderness designation."³¹ And the press release following the initial announcement had echoed: "Norbeck was [allocated] to nonwilderness because wilderness classification would conflict with the wildlife purposes for which the area was set aside in 1920 by Congress." A later Black Hills National Forest document added that Wilderness status might even have conflicted with the 1,190 acres of virgin Research Natural Area.³² These were the conflicts "found not to exist" when the administration flipped Norbeck and Beaver

Park in April 1979, but they did exist, and they took almost two years to iron out in the legislative process.

The real rub was not fire suppression, grazing, commercial logging, or even the substantial stone tower at the apex of the new Wilderness. It was that the Forest Service and others were concerned about the survival of wildlife in this new Wilderness. This should seem odd: why would wildlife die in a Wilderness? Well, just as Custer State Park had been restocked with bison, elk, beaver, and other animals at its establishment, the Preserve was stocked with Rocky Mountain goats, perhaps suggested by the rock outcroppings. An exotic species, they required human manipulation of their habitat to thrive, especially in an era of fire suppression. By the 1970s there were an estimated 300 to 400 goats in the herd, centered roughly where the Wilderness was proposed. Heavy foraging of favored foods like chokeberry and serviceberry had caused "poor plant conditions," according to the Supervisor, and goat and elk bedding areas becoming infested with parasites. Controlled burning of a thousand acres or so, and possibly selective cutting, would open up the dense forest, stimulate grass and bushes, and create more bedding sites. Without continued improvements to the goats' forage and habitat, the Forest Service expected the goat herd to decline, by how much no one knew.³³

It came down to this: which law would have precedence—the 1920 Preserve statute, or the Wilderness Act? In September 1979 the Black Hills National Forest Supervisor urged removing the proposed Wilderness from the wildlife preserve, but providing for Preserve-like maintenance of the mountain goat habitat. Later that month McGovern introduced his Wilderness bill (the same bill proposing the Black Elk name) in a speech warmly positive toward wilderness, or at least the establishment of this particular Wilderness: "[I]t is historically, morally, and spiritually so very right that we do so." This bill agreed with the Black Hills National Forest Supervisor: "The wilderness . . . shall be administered . . .

in accordance with (1) the provisions of the Wilderness Act . . . [and] (2) the provisions of the Act of June 5, 1920." In his speech McGovern called for "biologic manipulation" of goat and elk habitat, particularly prescribed burning.³⁴

Three months later, on the floor of the House, Jim Abdnor gave a very different speech:

The large majority of my constituency reacts negatively to the very concept of wilderness. . . . They are violently opposed to the continued expansion of the authority of the Federal Government, [particularly increased] control of a basic and precious resource; that is, our land. . . .

I sincerely resent the holier-than-thou attitude many of our urban cousins take in suggesting that they know better than our local rural people. . . . I am a staunch supporter of multiple-use management of our public lands—not just in some cases or even in most cases, but in virtually every case. . . .

But not in this case; Abdnor proposed the same area for Wilderness that McGovern had. And interestingly, he changed McGovern's text to hew more closely to strict wilderness management; the law establishing the Preserve would apply only "to the extent that they are not inconsistent with the provisions of the Wilderness Act." Abdnor referred to this explicitly in his speech: "vegetative manipulations will not be performed to increase wildlife populations."³⁵

In May 1980 the associate chief of the Forest Service testified to a Senate committee, apparently in support of Abdnor's text, that "habitat manipulation [was] not consistent with the proposed wilderness designation." The Wilderness could still have Preserve status, he said, but "the wilderness designation would take precedence." Yet McGovern tried again in September 1980, amending Abdnor's bill so as to require administration of the Wilderness "in accordance with" the Preserve statutes,

and again calling for "continuation of wildlife management."³⁶

By then McGovern and Abdnor were in the last weeks of a campaign for McGovern's Senate seat. McGovern lost that campaign, and McGovern lost this minor skirmish over the Wilderness. Jimmy Carter signed the bill, now Public Law 96-560, just before Christmas 1980, and the House-Senate conference committee had settled on the Abdnor language supported by the Washington Forest Service: the Preserve statutes applied only "to the extent they are not inconsistent with the provisions of the Wilderness Act."

So what was this disagreement about? The side issue was whether the new Wilderness would remain part of the Norbeck Preserve. South Dakotans did not want a doughnut-shaped scrap as a memorial to their former governor. This was avoided by keeping the Wilderness nominally within the Preserve. (This meant, by the way, an almost perfect five-layer concentric "wedding cake" of preservation in the Black Hills: forest, national forest, Preserve, Wilderness, and Research Natural Area. Elevation equaled protection.)

But the heart of the Preserve/Wilderness question was of course that several actors shied away from full wilderness for the Wilderness. That would mean abandoning the wildlife to nature and accepting whatever "game crop" resulted. It also meant abandoning the goats. They were never fully wild—not just because people introduced them, but because people had to help them survive in those numbers. The goats needed openings in the ponderosa, and usually one of three things will create these openings: loggers, pine beetles, or fire. The politics of wilderness is all about letting the beetles and fire do it rather than the chainsaws. By changing from Preserve to Wilderness, Norbeck's core became "a breeding place" not only for game but for beetles and fires. Abdnor, just before passage of his bill, gave his constituents assurances on eight wilderness-related issues; fire, beetles, and logging were numbers one, two, and three.

When faced with this issue, McGovern the East River environmentalist Democrat

tried for looser rules allowing more management, but Abdnor the West River “wise use” Republican stuck tight to the Wilderness Act. Viewing this as a management issue, this is surprising. Perhaps just as Nixon could go to China, Abdnor could afford to do this because, as he said, “[M]y constituents know that I am anything other than a wild-eyed, environmentalist rabble-rouser.” But viewing this as part of the fight over future Wilderness designations, the contradiction disappears. The standard for managing a Wilderness, some have argued, is the same standard that any proposed Wilderness must meet. So a “purity policy,” demanding strict management, is one way to keep the National Wilderness Preservation System small. Abdnor indeed stated, “It is my intent that this legislation will close the book on wilderness deliberations in my state.”³⁷

CONCLUSIONS

RARE II was certainly not the end of wilderness politics in the Black Hills. But let us pause here and, like Foreman and Abdnor with their feet on their desks, consider for a moment what we have learned, first about wilderness purity.

During the RARE II process, South Dakotans tended to speak of “which area” in the Black Hills would be selected.³⁸ This may have been political realism, but it also reflected their tendency to discuss Wilderness designation as an honor or award rather than as a land-use plan. They saw the designation as descriptive, not prescriptive. This would imply an attitude of purism, as if the area with the fewest marks against its virginity should win.

But oddly the debate didn’t turn in that direction; it is hard to find arguments based on purity. The discussion of Norbeck’s goats, road, and tower was not whether they would detract from a possible Wilderness designation, but whether the designation would detract from them. There was a striking consensus, at least for lands with a modest human footprint, that the land heals itself back to wilderness. Particularly in this high-rainfall landscape

where an ungraded, ungraveled road was often the worst disqualifier. People actually watched this happen, when the disastrous 1972 flood that struck Rapid City also washed away many of Beaver Park’s roads.

The national trend, since at least the 1920s, has been designation of ever more imperfect lands. But another rational concern for anti-wilderness activists would be the land healing back to meet up with that loosening standard, and whether the public will accept this “secondary virginity” as valid. It happened at Harney Peak, where dialing back on the human impact rewilded the place to a small degree.

In this sense it is either fitting or ironic that the Forest Service classified each roadless area by its “Bailey–Kuchler ecosystem” (Fig. 3). The reference to geographer August Kuchler is remarkable because his system, often assumed to describe a region’s natural state at some point in the past, in fact describes a kind of hypothetical future. Kuchler said his map showed

the vegetation that would exist today if man were removed . . . and if the plant succession after his removal were telescoped into a single moment. The time compression eliminates the effects of future climatic fluctuations, while the effects of man’s earlier activities are permitted to stand. The potential natural vegetation is a particularly important object of research because it reveals the biological potential of all sites.

He was, in other words, mapping the entire United States as a kind of go-back wilderness, an early cartographic version of the recently popular “Earth after humans” genre. Perhaps not what the Forest Service had in mind.³⁹

The go-back dynamic is slippery. It makes more lands suitable for protection as Wilderness, or as other kinds of natural preserve, thus complicating Jim Abdnor’s wish to “close the book on wilderness in South Dakota.” But it also makes more activities permissible within natural lands by promising a kind of natural self-mitigation. It is a political pretzel.

And what did we learn about the politics? First of all, that the game was indeed a political one. After several denials that public comments would be handled as vote counting, that is exactly how they were handled, with the vote counting even formalized in the publicized decision-making track (Fig. 6). Nationally, environmentalists were naive to think votes would not be counted, because this was already being discussed in the inventory phase, and the implication was clear: how else could several hundred thousand "inputs" be considered? Discounted unless judged to be "thoughtful"? RARE II was accused of being a political decision with a scientific face, but it was really a political decision with a political face. And when it was done its formal results were simply thrown to the arena of ordinary congressional politics.⁴⁰

In the end, Dave Foreman's conclusions described the Black Hills accurately: the commodity interests stood firm, the conservationists stood timidly against them, and so the chosen Wilderness was the area of least cost.⁴¹ But Jim Abdnor was right, too: South Dakotans disliked wilderness generally and Beaver Park distinctly, but the conflict could be minimized because the opposition *was* general and not truly aimed at Norbeck. The Forest Service played its role in the middle; if it did less than the environmentalists wished for, it also did more than the environmentalists could rally support for. It was national Forest Service officials, after all, who insisted that Black Hills ponderosa forest be represented in the National Wilderness Preservation System, and by the numbers even Norbeck had only 6 percent of the public support.

But the main story politically is that this was definitely not some national imposition upon the Black Hills. The attempted imposition was rebuffed in 1979, and every local interest group came out satisfied. South Dakotans had power, at least in deciding *which* area was designated, and even in the details of how it would be managed. And yet the local rhetoric was a drumbeat of the small-state litany: big-state urban bureaucrats and environmentalists were

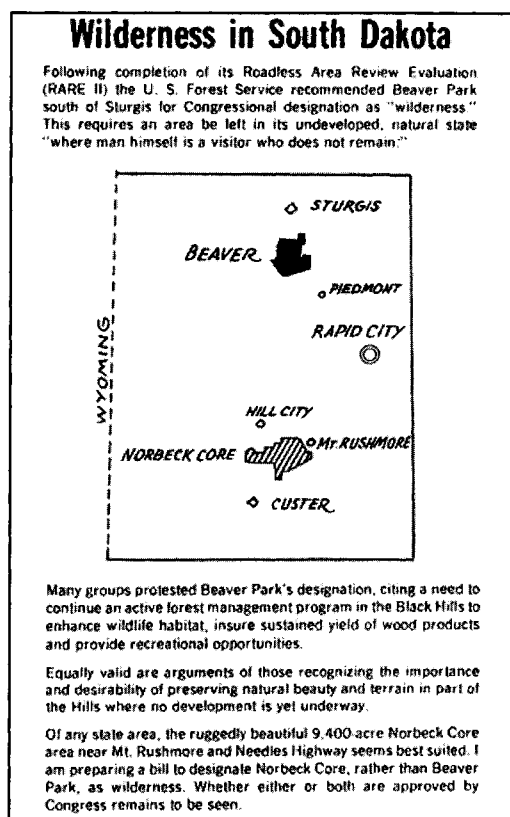


FIG. 8. *Abdnor map*. Courtesy of South Dakota State Archives.

going to lock up vast expanses of the Black Hills. This was the tone in the news coverage, in the social analyses, in the Forest Service press releases, and in the mismatch between rhetoric and action so striking in Abdnor's House speech delivered long after the issue was settled in his favor.

One last example is illustrative. In that spring of 1979, after South Dakotans successfully overturned the Beaver Park decision, Jim Abdnor discussed the issue in his regular mailing to constituents (Fig. 8). Note that it sets up a choice between a Beaver Park Wilderness or continued multiple use for the Black Hills, as if Beaver Park's 5,040 acres would imperil the habitat, recreation, and timber industry of a 1.2-million-acre Forest. The map illustration, sent out at least twice, is an illuminating bit of misinformation, whether deliberate or not.

Even at first glance the roadless areas look suspiciously large, and overlaying this illustration onto a map of the Black Hills confirms this. The towns and state border are positioned accurately, but Norbeck (shaded gray for an unstated reason) is shown at about 200 percent of its real size. Beaver Park, in solid black, looms over Sturgis at about 320 percent of reality. Looking at this map, which shows only the central portion of the national forest within its bounding box, one might agree that a major change in forest management was being debated, that the future of "an active forest management program in the Black Hills" really was on the table. It never was, but that is not the point; this map is in the realm of rhetoric, not reality. It is a political mind-map.⁴²

NOTES

1. Dave Foreman, *Confessions of an Eco-Warrior* (New York: Harmony Books, 1991), 13.
2. Sam Clauson, interview by author, Rapid City, SD, October 21, 1999.
3. There is no general history of the Black Hills National Forest covering this time period. For RARE II there have been extensive national studies, such as Raymond W. Karr, "Forests for the People: Case Study of the RARE II Decision" (Ph.D. diss., University of Montana, 1983). But there have been almost no intensive case studies examining roadless areas going through the process. A useful exception, though for a vast geographic area, is William D. Doron, *Legislating for the Wilderness: RARE II and the California National Forests* (Millwood, NY: Associated Faculty Press, 1986).
4. Doron, *Legislating for the Wilderness*, 68, 89; William Cronon, "The Trouble with Wilderness," *Environmental History* 1, no. 1 (January 1996): 7-28.
5. Though as noted there is no general history of the Black Hills National Forest, one rich source on early settlement is Lance Rom, ed., *Black Hills National Forest Cultural Resources Overview* (Custer, SD: Black Hills National Forest, 1996), 4a7-4a14, 5e1-5e3.
6. This is geographer Martha Geores's apt phrase in *Common Ground: The Struggle for Ownership of the Black Hills National Forest* (Boston: Rowan and Littlefield, 1996), 43.
7. Sven G. Froiland and Ronald R. Weedon, *Natural History of the Black Hills and Badlands* (Sioux Falls, SD: Center for Western Studies, 1990), 81-96.
8. Herbert T. Hoover et al., *A New South Dakota History* (Sioux Falls, SD: Center for Western Studies, 2005), 310.
9. Dennis M. Roth, *The Wilderness Movement and the National Forests*, 2nd ed. (College Station, TX: Intaglio, 1995), 63-65.
10. James Hagemeyer to Lloyd Todd, July 19, 1977, Black Hills National Forest Supervisor's Office records (hereafter cited as BHNFSO); James Mathers to District Rangers and others, December 2, 1977, BHNFSO; Mathers to District Rangers, September 30, 1977, BHNFSO.
11. John McGuire, "RARE II Inventory List," *Federal Register* 42, no. 223 (18 November 1977): 59688; Mathers to District Rangers, September 30, 1977, BHNFSO.
12. Linea Sundstrom, "The Sacred Black Hills: An Ethnohistorical Review," *Great Plains Quarterly* 17 (summer/fall 1997): 189-90; Mark Junge, "Historic Inyan Kara," *Bits and Pieces* 8, no. 5 (1972): 1-9.
13. Sierra Club, Dacotah Chapter, "Black Hills National Forest Wilderness Proposal," 1991; Sand Creek Social Analysis, Mathers to District Rangers, February 3, 1978, BHNFSO.
14. "Wilderness Designation Sought," *Rapid City Journal*, January 4, 1979.
15. U.S. Congress, Senate Committee on Energy and Natural Resources, Roadless Area Review and Evaluation (RARE II), Publication No. 95-92 (Washington, DC: General Printing Office, 1978), 124.
16. Mathers to District Rangers, February 3, 1978, BHNFSO.
17. Jim Abdnor to Secretary Bob Bergland, February 14, 1979, BHNFSO.
18. Chief John McGuire, "Roadless Area Review and Evaluation (RARE II) Inventory List," *Federal Register* 42, no. 223 (November 18, 1977): 59688; "Analysis of Public Comment to the Roadless Area Review and Evaluation (RARE II)," October 26, 1978, BHNFSO.
19. "National Direction," U.S. Forest Service, October 27, 1978, BHNFSO.
20. "How RARE II Decision Was Reached," John R. McGuire, January 4, 1979, BHNFSO.
21. "Wilderness Designation Sought," *Rapid City Journal*, January 4, 1979.
22. "Beaver Park RARE II Area," undated BHNFSO document sent to Nemo District Ranger Dave Blackford on December 19, 1984, BHNFSO; Paul Riley, "Wilderness Area Rates High for Mineral Potential," *Rapid City Journal*, January 17, 1979, 1; Paul Riley, "Beaver Park Walk Shows Little Signs of Wildlife," *Rapid City Journal*, March 23, 1979, V3.
23. Governor Janklow to Bergland, February 28, 1979, BHNFSO; Abdnor to Mathers, March 7, 1979,

BHNF SO; Sen. McGovern to Bergland, May 3, 1979, BHNF SO; "Beaver Park RARE II Area," BHNF document to Ranger Blackford, December 19, 1984, BHNF SO.

24. Mathers to District Rangers, September 23, 1977, BHNF SO; Riley, "Beaver Park Walk."

25. Brian G. Krick, "Mountain Farmers: Supervisors of the Black Hills National Forest, 1898-1995" (master's thesis, University of South Dakota, 2001), 57.

26. "Beaver Park RARE II Area," sent December 19, 1984, BHNF SO.

27. Clauson, interview by author.

28. Mathers wrote to "Secretary Merwin" on February 21, 1979, on the merits of Norbeck and Beaver Park, but I have not found this letter (Abdnor to Mathers, March 7, 1979); Riley, "Wilderness Area Rates High."

29. *Congressional Record*, 96th Cong., 1st sess. (September 18, 1979): 25029-25031.

30. Sup. Mathers to Regional Forester Rupp, September 7, 1979, BHNF SO.

31. OGC (Office of General Counsel?) to BHNF, March 31, 1978, BHNF SO.

32. "RARE II: How the Black Hills National Forest Allocations Were Made," attached to February 2, 1979, BHNF press release, BHNF SO; "Beaver Park RARE II Area," BHNF document to Ranger Blackford, December 19, 1984, BHNF SO.

33. Mathers to Rupp, September 7, 1979, BHNF SO.

34. Mathers to Rupp, September 7, 1979; *Congressional Record*, 96th Cong., 1st sess. (September 18, 1979): 25029-25031.

35. *Congressional Record*, 96th Cong., 1st sess. (December 10, 1979): 35135-35136.

36. "Statement of Douglas R. Leisz," May 29, 1980, BHNF SO; *Congressional Record*, 96th Cong., 2nd sess. (September 25, 1980), 27283-27286.

37. Craig W. Allin, *The Politics of Wilderness Preservation* (Westport, CT: Greenwood Press, 1982), 157-60, 191; *Congressional Record*, 96th Cong., 1st sess. (1979): 35135-35136.

38. McGovern to Bergland, May 3, 1979, BHNF SO; discussion of Sierra Club, above.

39. August W. Kuchler, "Potential Natural Vegetation," in *The National Atlas* (Washington, 1970).

40. For denials, e.g., Rupp to Forest Supervisors, September 26, 1977; Nelson to Regional Foresters, September 19, 1978, BHNF SO; Doran, *Legislating for Wilderness*, 96.

41. Foreman, *Confessions of an Eco-Warrior*, 13, 16, 111.

42. "Reports from Washington," spring, winter 1979, Abdnor Papers, South Dakota State Archives, Pierre.