

## **Examples Paragraphs for Legal Complaints** *Great Old Broads for Wilderness*

### **Bears Ears National Monument Case:**

GREAT OLD BROADS FOR WILDERNESS (Great Old Broads) is a national grassroots organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild lands. Great Old Broads has over 8,500 members and supporters, many of whom reside and/or engage in [recreational activities in Utah]. It was formed, in part, to protect the interests of senior populations who value roadless areas, enjoy them without mechanized means of transportation, and want to see these areas protected in their natural state for future generations. Protection of federal public lands in southern Utah has been an important focus of Great Old Broads since it began in 1989. Great Old Broads has conducted educational, stewardship, documentation, and advocacy activities related to the lands within the original Bears Ears National Monument. The organization has submitted public comments on numerous draft plans for areas within the original National Monument boundaries and has also requested its members to submit comments. Great Old Broads has also advocated for wilderness designations in areas within the Monument. Great Old Broads has organized multi-day camping events in or adjacent to the Monument, including a five-day education, advocacy, and stewardship event in 2016.

### **Boise Air Force Case:**

Plaintiff GREAT OLD BROADS FOR WILDERNESS is a national, non-profit organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild lands. The organization has a grassroots chapter located in Boise, Idaho, known as the Boise Broadband. Formed in 1989, Great Old Broads now has over 8500 members in all 50 states who believe that wild places are valuable in their own right, who value the spirit and intent of national conservation legislation such as the Wilderness Act and the National Environmental Policy Act, and who support sound science as a basis for informed decisions. A primary goal of Great Old Broads is to ensure that there will still be remote, untrammeled places left not just for our own grandchildren, but for those of all species. The organization has worked to protect the Owyhee Canyonlands in southwestern Idaho, the last great unprotected expanse of the American West, and other treasured public lands that may be impacted by the Urban CAS. 9. Plaintiffs participated in the Air Force decision-making process by attending public meetings pertaining to the project and/or commenting on the Draft Environmental Assessment for the project.

### **Chainsaws in Weminuche and South San Juan Wilderness Areas, CO:**

Plaintiff GREAT OLD BROADS FOR WILDERNESS (“Great Old Broads”) is a national, non-profit organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild lands. The organization is headquartered in Durango, Colorado. Formed in 1989, Great Old Broads now has over 8,500 members and advocates in all 50 states who believe that wild places are valuable in their own right, who value the spirit and intent of national conservation legislation such as the Wilderness Act and the National Environmental Policy Act, and who support sound science as a basis for informed decisions. A primary goal of Great Old Broads is to ensure that there will still be remote, untrammeled places left not just for our own grandchildren, but for those of all species. Great Old Broads’ local chapter, called the South San Juan Broadband, emphasizes protecting designated wilderness and other public lands in southwestern Colorado. Great Old Broads members in the Four Corners region use and plan to use the Weminuche and South San Juan Wildernesses and are adversely affected by motorized equipment use in these Wildernesses. Great Old Broads brings this action on its own behalf and on behalf of its adversely affected members.

### **Mt St Helen’s National Volcanic Monument Spirit Lake Complaint:**

Plaintiff GREAT OLD BROADS FOR WILDERNESS (“GREAT OLD BROADS”) is a national, non-profit organization led by women, that engages and inspires activism to preserve and protect

wilderness and wild lands. Formed in 1989, Great Old Broads now has over 8,500 members in all 50 states who believe that wild places are valuable in their own right, who value the spirit and intent of national conservation legislation such as the Wilderness Act and the National Environmental Policy Act, and who support sound science as a basis for informed decisions. A primary goal of Great Old Broads is to ensure that there will still be remote, untrammeled places left not just for our own grandchildren, but for those of all species. Throughout the country, Great Old Broads have conducted educational and advocacy activities on the conservation and stewardship of public lands, including monitoring of impacts of illegal motorized use, evaluating rangeland health, working with federal and state land management agencies on conservation stewardship and restoration projects, providing comments during public land planning processes, litigating on issues related to land use and cultural resource protection, participating in collaborative public land management efforts, and educating our members and the public about values of wilderness and public lands. Great Old Broads has members throughout the state of Washington, including four active grassroots chapters in the state. Members of the Great Old Broads were active in the formation of the Monument and have remained active in actions to protect the Monument from mining and other dangers. Great Old Broads members regularly visit the Mt. St. Helens National Volcanic Monument (Monument) and have hiked, camped and snowshoed in and around the Monument. Great Old Broads have monitored and worked to restore the Monument and the land around it, both in group activities and as individuals. Great Old Broads hiked in the Monument during their annual campout in 2014. Great Old Broads organized stewardship projects around the Monument in 2017 and 2019, including measuring trees subject to timber sales, setting cameras to document wildlife, and monitoring beaver habitat for potential release.