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ISSN 0194-3030



# WILDERNESS RECORD

PROCEEDINGS OF THE CALIFORNIA WILDERNESS COALITION

Vol. 12 2655 Portage Bay East, Suite 5 Davis, CA 95616 May-June, 1987 No. 3

## Lawsuit Filed To Stop Logging Sequoia Groves

By Joe Bogaard

A lawsuit has been filed recently against the Sequoia National Forest in defense of the spectacular Giant Sequoia redwood groves in which the Forest Service has begun to road and log. The suit was brought by the Kern Kaweah and Tehipite chapters of the Sierra Club.

The lawsuit, which was filed in mid-May, seeks permanent protection for the few remaining old-growth groves. The plaintiffs also have requested a restraining order to prevent the Forest Service from logging the groves any further until a court decision has been made.

Although a plea for a temporary restraining order was denied, the judge is now considering the request for a preliminary injunction to halt the logging.

The Sierra Club chapters, Forest Alliance, and several individuals previously have filed administrative appeals in an attempt to stop a number of timber sales. Forest Service Chief Dale Robertson recently denied several of these appeals, leaving the plaintiffs no option but to ask for judicial relief.

In the complaint, the Sierra Club charges that the Forest Service has failed to prepare an Environmental Impact Statement addressing the logging activities in the Sequoia National Forest, to assess the cumulative environmental impacts on the forest due

to timber harvests, to assess the impacts of logging on water quality and fisheries, and to acknowledge the increasing problem of unsuccessful reforestation attempts on the forest.

Although they tend to leave the solitary giants standing, the Forest Service is carving out all other marketable tree species regardless of the inevitably adverse impacts upon water quality, wildlife species (including the threatened spotted owl), abundant fisheries, and survival and aesthetics of the groves.

The *Sequoiadendron giganteum* are the largest living things on earth; many of them are thousands of years old. There are thirty-six groves constituting 13,200 acres within the 1.1 million acre Sequoia National Forest.

The turn of this century brought with it extensive logging of redwoods, and although primarily on private lands, public concern and outcry resulted. Since its institution, the Sequoia National Forest has traditionally avoided lumber activities within the remaining redwood groves. The first timber sale within a redwood grove boundary occurred in 1982, and three years later sixty acres had been cut. By September of 1986, over 450 acres were harvested with an additional 600 acres slated for logging. Assuming that these remaining units are also

See LOGGING OF SEQUOIAS, page 5



Not all giant sequoias are protected in National Parks

Photo by Charlene Little

## East Mojave Scenic Area Plan Needs Comments

By Vicky Hoover

At a June 4 press conference in Los Angeles, the Bureau of Land Management [BLM] finally released to the public its draft "Management Plan and Environmental Assessment" for the East Mojave National Scenic Area, the crucial California Desert region administered by the BLM as part of the California Desert Conservation Area.

Public comments on the plan will be accepted until August 3.

Past and ongoing conservationist concerns with the inadequacies of the lax BLM management have led to a proposal to transfer the East Mojave to the National Park Service's tighter administration as a new Mojave National Park. This proposal is the centerpiece of Senator Alan Cranston's S.7—the California Desert Protection Act. A companion bill in the House of Represen-

tatives is Rep. Mel Levine's analogous H.R. 371; both are strongly supported by conservationists.

The East Mojave draft plan, formulated as part of the guiding framework of the California Desert Plan adopted by the BLM in 1980, discusses many issues of concern to the public and offers some token improvements in management direction. Principal topics of interest are recreation management, motor vehicle use, access and land

ownership adjustments, visual quality, wilderness values, archaeological and historic resources, vegetation, wildlife habitat, livestock grazing, mineral development, and fire management.

The BLM has maintained there is no problem with the quality of its administration. The claims are mirrored in the relatively meager and feeble changes proposed in the draft management plan and the narrow

See EAST MOJAVE, page 7



## COALITION REPORT

By Jim Eaton

"...Keep close to Nature's heart, yourself; and break clear away, once in a while, and climb a mountain or spend a week in the woods. Wash your spirit clean..."

—John Muir

My spirits needed cleansing recently, so I took Mr. Muir's advice. Among other things, this issue of the *Record* has been especially troublesome, with missed deadlines, lost photos, and late-breaking events.

So I decided to nab a visit to the mountains. Just a quick trip north with Inyo, the new office puppy, to put life back into perspective.

The term puppy, by the way, is used somewhat advisedly. This half black lab, half malamute kid passed the fifty pound mark last week—and has yet to turn five months old. I may be in the market for a used saddle soon.

We didn't have time to spend a week in the woods, but we did climb a mountain and looked out over an expanse of old-growth forest that now is in the National Wilderness Preservation System. Eighteen years ago I began writing letters about this roadless area, so there was a personal sense of satisfaction at looking out over the forest canopy and knowing that spotted owls, wolverines, mountain lions, and other wild creatures have a permanent home here.

I left home without knowing exactly where I would be going hiking. As a result, I had just a Forest Service map as a guide. But it looked like I could make a loop hike if I could find the right secondary trail.

We did find a trail pointing generally in the way we wanted to go. It was little-used and somewhat faint, but Inyo loved sniffing the overhanging bear grass and

ferns. It was a challenge to follow the route across the meadows. My kind of trail.

Great wildflowers: paintbrush, lupine, and one of my very favorites, columbine. Since I am not as familiar with the forests to the north, there were other flowers I can't recall seeing before.

It began to rain. And rather than bend to the right to complete a loop, the trail kept bending left. Late in the day, and taking into account the rain and my failure to bring along matches or a flashlight, we abandoned the loop and retraced our steps.

We got back to camp before dark, and a hot meal and dry tent completed the day. In the morning the showers gave way to the sun, giving the forest a refreshed appearance. A most memorable weekend.

Among the images that will remain with me is looking out over the vast old-growth forest and realizing that it is part of a designated wilderness area. Thousands of people were involved in a number of ways helping to preserve this area, and I played a small role as well.

It reminded me that we *have* been successful in preserving wild lands, and that with teams of dedicated people working on other threatened roadless areas we again will be successful in the future. Spending my days with the telephone, computer, and mountains of paper, I tend to forget what I am doing and why.

So take John Muir's advice. Get away from from the trials and tribulations of civilization this summer and keep close to Nature's heart.

We are pleased to welcome to the Coalition another group member, Forest Alliance in Kernville and two new business sponsors: Gorman & Waltner of Oakland and David B. Kelley of Davis. Thanks for joining the team.

## Maneuvering Fails on Pit River

Attorneys for a hydroelectric development firm have failed in an attempt to divert an appeal filed by the California Wilderness Coalition and other groups to defend the Pit River Wilderness Study Area. Ironically, their efforts to obtain a quick decision actually have slowed the appeal process.

The Coalition, Friends of the River, Sierra Club California, and The Wilderness Society filed an appeal in March to block construction of a hydroelectric project that would remove between 600 to 700 cubic feet per second of water from the Pit River upstream of the Pit River Canyon Wilderness Study Area [WSA]. The Bureau of Land Management [BLM] authorized the project in spite of their recommendation that part of the WSA be designated a wilderness by Congress. At the time of filing, the groups asked for a 60-day extension of time in which to file their Statement of Reasons.

Attorneys for the Malacha Power Proj-

ect, Inc., sent a lengthy brief to the Interior Board of Land Appeals [IBLA] asking that no extension of time be granted. The IBLA responded by granting a 30-day extension.

The lawyers then petitioned Interior Secretary Donald Hodel, asking him to take the case away from IBLA and rule on it himself. A number of documents were filed with Secretary Hodel in an attempt to show that the conservationists have no legal case.

The Secretary's office ultimately decided not to assume jurisdiction of the case. However, the IBLA had stopped working on the issue while awaiting the decision of the Secretary's office.

In the meantime, the appellants filed their Statement of Reasons and BLM has responded to their Statement.

The appellants argue that the construction of this project violates the Federal Land Policy and Management Act of 1976 which requires BLM to maintain the wilderness

## UPDATE

### Zane G. Smith Leaving Regional Forester Job for New Assignment

Zane G. Smith, Jr., regional forester in California for nearly a decade, is taking on a new assignment. He is making a lateral move to work on a Forest Service strategy for recreation, looking ahead into the 21st century.

Smith will make the change in August. Although in his new position he will visit most of the Nation's national forests, he will remain based in San Francisco.

In an interview with *The Sacramento Bee*, Smith suggested the Forest Service wants to change its image.

"A lot of people feel the Forest Service has not kept up its policy on recreation," Smith explained. "What we would like people to think about when they think of the

Forest Service is outdoor recreation rather than timber harvesting. There is a perception now that the Forest Service is not in the recreation business, yet we are."

"The problem in the forests is becoming stewardship," Smith said, "or the public just won't let us cut timber. They want to use wood we cut, but they don't want to see us compromise our soil, water, wildlife, and visual resources."

Prior to coming to California, Smith led the Forest Service effort on the second Roadless Area Review and Evaluation [RARE II] program.

Smith's replacement will be Paul F. Barker, assistant director of recreation in the Washington, D.C., office.

### July Hearings Set for California Desert Protection Act

Senator Alan Cranston's bill to protect the California Desert will get its first hearings on July 21 and July 23 in the U.S. Senate. A number of conservationists from California plan on attending the hearings and testifying in favor of the bill.

Cranston's bill gives statutory protection to 82 wilderness areas which cover 4.5 million acres of BLM land. The bill also redesignates both Death Valley and Joshua Tree national monuments as national parks and makes appropriate additions to both. It creates a new Mojave National Park which

incorporates the existing East Mojave Scenic Area. Within these parks, 3.9 million acres of national park wilderness have been included. Cranston also proposes the long awaited expansion of Red Rock Canyon, the creation of the Desert Lily Sanctuary to protect the very vulnerable Desert Lily, and the establishment of the tribally controlled Indian Canyons National Historical Site.

Companion bills have been introduced in the House of Representatives by Reps. Mel Levine and Richard Lehman. Hearings have not been scheduled on these bills.

### House Moves to Block Land Sale

In early June the House of Representatives moved to prevent the Reagan administration from selling up to 260,000 acres of public land in the West for \$2.50 an acre—or, as one member said, less than a six-pack of beer.

The bill, sent to the Senate by a 295-93 vote, would amend a 1920 law that sets \$2.50 as the sale price for land on which oil shale claims were made before 1920. The law stipulates that to buy for that price, a

claimant must have spent money to develop the claim.

Supporters of the legislation say that nothing has been done to develop the 1,625 oil shale claims on 260,000 acres of federal land in Colorado, Utah, and Wyoming.

The principal author of the bill, Rep. Nick J. Rahall II [D-W. Va.] said that "\$2.50 an acre is less than it costs for a six-pack of beer—cheap beer at that."

### Final Sequoia Plan Delayed a Year

The long-awaited final Land Management Plan and Environmental Impact Statement for the Sequoia National Forest has

characteristics of WSAs until Congress makes a final determination of their fate. The conservation groups also believe that an Environmental Impact Statement is required for such a project.

In addition to other arguments, the attorneys for the developer now are arguing that they don't even need a right-of-way grant from BLM to build their project on

been delayed until the spring of 1988 "because of computer modeling difficulties," according to Supervisor James A. Crates.

public land. And due to a change in the appeal regulations, construction has begun despite the appeal.

But the lawyers for the developer are worried, however, that the "cloud of the appeal" may limit their client's ability to obtain additional financing to finish the development, leaving the project dead in the water.



## PUBLIC LANDS

## Cache Creek: Coast Range Wildlands Worthy of Protection



Cache Cr. WSA

Photo courtesy of BLM

By Jennifer Wachter

The Rocky Creek-Cache Creek Wilderness Study Area [WSA] is located about 70 miles northwest of Sacramento and four miles east of Clear Lake. This magnificent 33,582-acre piece of land ranges from steeply walled canyons, to broad grassy flats and rolling chaparral-covered hills.

There are a number of special features within this area that make it worthy of wilderness designation. The vegetation found here varies from serpentine chaparral to oak woodland. Such undisturbed, once-typical coastal habitat is becoming rare in these times of rapid development and increasing population. It is imperative that such areas are preserved while they still exist.

A vast number of species, including tule elk and wintering bald eagles, dwell in the WSA. The elk herd, the second largest in

the state, spans over 100,000 acres and includes more than ten percent of the existing population of tule elk, presently a fully protected species in California. Sadly, the elk populations have been adversely affected by unrestricted off-road vehicular traffic during the rutting and calving seasons, when they are most sensitive to the presence of humans.

Each year from October through April, the second largest wintering bald eagle population in the state roosts in and around the immediate outskirts of the Cache Creek WSA. This is extremely significant because of this eagle's position as a nationally endangered species. Surveys have indicated that 55 or more birds come here from as far away as Alaska and Canada. Bald eagles are also very sensitive to human presence.

Cache Creek twists through the WSA, flowing from east to west. The creek is an outstanding feature in the WSA because of its great value for wildlife and recreation. It is rated a class II whitewater stream, and people come from all over the state to spend time boating and rafting in the beautiful scenic setting. Downstream it is an important source of water for agricultural and domestic use.

Cache Creek is listed in the "National Rivers Inventory" as a potentially wild and scenic river and is designated a "Priority Action Waterway" in the California Protected Waterway Plan. Part of the WSA within a half mile of Cache Creek is included in the newly released ACEC draft plan. The western portion of the WSA contains 11,206 acres of land designated as the Northern California Chaparral Research Natural Area. All of this may help to protect the area, but wilderness designation is vital for the preservation of the entire Cache Creek

ecosystem.

There are three to four grazing leases in the WSA presently covering 10,502 acres of public land. These would not be affected as a result of wilderness designation but no new leases would be permitted in the area (see article on Grazing, Page 4).

There are approximately 300 mining claims in the WSA, but all mining activity has been stopped for four years. Most mines have been inactive for much longer than this, however.

Gas and oil lease applications in the WSA are numerous despite the fact that the potential for oil, gas, and geothermal production is considered low. Wilderness designation would serve to protect the area from any further mining disruptions.

Much evidence of prehistoric occupation has been documented within the Wilson Valley. Housepit village sites and burial grounds abound here. Unfortunately, some of these archaeological sites have been damaged as a result of off road vehicle usage.

A newer threat to the Cache Creek WSA is the proposal to build a dam near Blue Ridge, north of Rumsey. This plan is justified under the blanket of flood control, and is being considered despite the fact that a dam in that location would flood out fifteen to twenty miles of land along the creek. This would reach and destroy invaluable bald eagle and Tule elk habitat, and place rare wild land under water.



Jennifer Wachter is a volunteer with the CWC and is an Arts/English major at the University of California at Davis.

## Management Plan Released for Cache Creek ACEC

In April of this year, the Bureau of Land Management [BLM] came out with the draft management plan for the Cache Creek Area of Critical Environmental Concern [ACEC]. The ACEC establishes a one-mile corridor of public land along Cache Creek between the Clear Lake Dam and Rumsey which is worthy of protection.

The Cache Creek ACEC has actually been divided up into four areas of special concern: riparian/primitive recreation values, the wintering bald eagle population, the tule elk herd, and cultural resources. The BLM has recently acquired private land located in the Wilson Valley area and included it within the ACEC, bringing the area located within the ACEC at present to approximately 23,934 acres.

There are 35 miles of Cache Creek currently included in the ACEC. Part of Cache Creek is used by river runners an estimated 5,000 visitor-use days per season. Hiking, hunting, and fishing also occur in the area. The rugged terrain can provide for a challenging wilderness experience since few trails exist within the area.

Most of the area located in the ACEC is also part of the Rocky Creek/Cache Creek Wilderness Study Area. Designation of this area as both official wilderness and an ACEC would best protect it, since present BLM management has proven ineffective in providing the protection needed. This is partially demonstrated through impacts on the ACEC from local off-road vehicle (ORV) usage which has harmed the remains of prehistoric dwellings and people, the riparian values of the area, and both bald

eagle and tule elk populations.

Presently occurring unauthorized (illegal) uses in the ACEC and WSA include trespass cattle, rock and gravel mining, road construction, and firewood cutting.

Comments on BLM's management plan are being accepted until July 1. Contact:

Gretchen L. Smyth, Area Manager  
Bureau of Land Management  
Ukiah District Office  
P.O. Box 940  
Ukiah, CA 95482



Cache Creek Wilderness Study Area

Photo courtesy of Bureau of Land Management

## BLM Plans to Weed Cache Creek Area

The Bureau of Land Management [BLM] is proposing to allow a wildlife habitat improvement project in lands which may become a part of the Cache Creek Wilderness. The plan by the California Department of Fish and Game will require a crawler or wheeled tractor to disc star thistle and tar weed. In the fall, annual range grass will be drilled in and fertilized. Next year, in late spring or early summer the area will be burned or disced. In the fall of 1988 an appropriate seed mix of species found in the area that are deep rooted and perennial will be drilled and fertilized.

BLM says that the wilderness character of these lands in Wilson Valley will not be impaired. The agency argues that removing a noxious weed will improve wildlife habitat and improve the recreation and wilderness character of the area.



## FOREST PLANNING

## San Joaquin Roadless Area: Wilderness or Ski Resort?

by Joe Bogaard and Jim Eaton

The Inyo National Forest, in association with a private developer, is planning to attach the Mammoth Mountain and June Mountain ski areas and create a ski-lift and lodge megalopolis. This newly proposed ski expansion would destroy over one-half of the San Joaquin Roadless Area, carving up the forest for ski-runs and inundating the mountainous terrain with over twenty new lifts and two new lodges.

"It will be comparable to European ski areas where as many as 250,000 skiers are accommodated," said Dave McCoy, owner of the two existing ski areas. "It's always been a dream of mine to tie the two ski areas together."

McCoy visualizes well over 100 lifts covering Mammoth Mountain, June Mountain, and the roadless area between.

The ski expansion is part of a five-phase development plan. The Forest Service currently is considering the first two phases of the plan which would more than triple the capacity of the June Mountain resort.

Despite the major environmental impacts of this plan, the Forest Service is refusing to prepare an Environmental Impact Statement (EIS) but is relying on less thorough Environmental Analysis (EA). The EA now is expected to be completed in September.

Should the Forest Service still refuse to prepare an EIS after the release of the EA, environmentalists are preparing to appeal this decision. Last year Regional Forester Zane G. Smith overturned the Shasta-Trinity National Forest's attempt to authorize a ski area at Mt. Shasta without an EIS.

## SAN JOAQUIN ROADLESS AREA

Much of the San Joaquin Roadless Area was designated as part of the Ansel Adams Wilderness by the California Wilderness Act of 1984. This remaining unprotected wild area lies east of the crest of the Sierra Nevada in the Mono Basin and Owen's River watersheds.

The Inyo National Forest describes the natural integrity and appearance of the re-

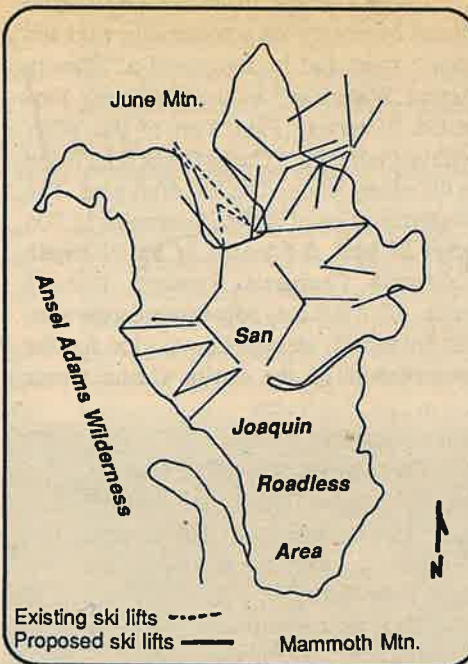
gion as "influenced [by man] to a very low degree" and states that the "opportunities for solitude and primitive recreation are outstanding." This northern portion of the roadless area is primarily forested, scattered with subalpine and red firs, as well as lodgepole pine. The terrain ranges from rolling to steep and the scenery is "unique", as portrayed by the Forest Service.

The San Joaquin Roadless Area is home to a variety of species including blacktail deer, American marten, a resident goshawk and black bear. A ski development would certainly negatively impact many, if not all, of these animals. Also, sedimentation from increased erosion on the new ski slopes could severely threaten the fisheries in streams surrounding the site.

Another major concern involves the fact that this proposed ski resort will double this region's skier capacity and one wonders if this is not, in fact, a rather excessive number that overestimates the demand.



Joe Bogaard is an intern with the CWC and is majoring in zoology at the University of California at Davis. Jim Eaton is the executive director of the Coalition.



Glass Creek Meadow and San Joaquin Ridge

Photo courtesy of Inyo National Forest

## Three More Sales Appealed

Three Forest Service timber sales have hit the appeals process and thus could be on the slow road to the inevitable courtroom showdown.

Those of note include two in the Six Rivers National Forest and one in the Shasta-Trinity National Forest. The latter is the Bear Creek Sale appeal that was initiated by the Trinity County Board of Supervisors.

On a three to two vote the Board approved a resolution to appeal to the Chief of the Forest Service the decision by Regional Forester Zane Smith which supported the Shasta-Trinity plan for logging Bear Creek. The area in question, northwest of Hayfork, is part of the Pattison roadless area that was released by the California Wilderness Act of 1984.

Supervisors Twilight, Garrett, and Meyer want the Forest Service to do a complete Environmental Impact Statement [EIS] on its Bear Creek project prior to any development.

The timber industry is aiding and abetting a drive to recall Supervisor Dean Meyer who has been a leader in the effort to protect Trinity County from the ill effects of herbicides, clear-cutting, and excessive road building.

In Humboldt County, the Hoopa Valley Business Council [HVBC] appeals Six Rivers National Forest Lower Trinity Ranger District plan to log one million board feet of timber to the east of the reservation near the Trinity Alps Wilderness. The HVBC, governing body of the Hupa Indian tribe, is particularly concerned about developments in this area because of spiritual concerns.

Their appeal states that "the essence of protecting a spiritual area is to protect the entire reservoir of knowledge associated with it; otherwise, the possibilities for future spiritual experiences and insights will necessarily be seriously diminished."

The sale area is adjacent to a newly expanded reserve area within the Hoopa Valley Indian Reservation where the HVBC has declared that the values of the land "are

incompatible with management for timber production." The approximately 1700-acre reserve was created by resolution in February of 1987 and is designated to be managed "in a wilderness state..."

A spokesperson for the HVBC says that the issue of tribal sovereignty is central to the dispute because the Forest Service's own regulations require the agency to coordinate planning on matters of mutual interest with the tribe on a government-to-government basis and that it has not done so. Also, the United States has special obligations not to create conditions upstream from Indian lands that will harm them.

Finally, the tribe contends that the Forest Service is obligated to minimize conflicts between the governments and that to do so the Forest Service should "defer to the Tribe's determination of the size of the sacred area..."

Meanwhile, on a rather trashed out tributary of the South Fork of the Trinity River, the Redwood Chapter of the Sierra Club has appealed a Six Rivers plan to proceed with the Madden Timber Sale. In this proposed timber sale the Forest Service has approved an environmental assessment [EA] for logging 5-6 million board feet of timber and building 1.4 miles of permanent road. The Forest Service states that the Sierra Club is "dismayed that...[the forest supervisor] selected [an] alternative... which does not meet forest guidelines for maintaining diversity, for limiting the amount of contiguous acres with [tree] growth less than 20 feet in height, and for preventing cumulative effects...[and] does not meet snag density standards."

This proposed sale is surrounded by logged over private timberlands, and the Forest Service lands in question have become the last refuge for old-growth-dependent wildlife species, like the spotted owl.

The Madden Sale appeal is scheduled for an oral presentation on June 26 in San Francisco.

—Northcoast Environmental Center



Mammoth Mtn. (background) from June Mtn.

Photo courtesy of Inyo National Forest



## EPA Criticizes Six Rivers Plan

The Environmental Protection Agency [EPA] has criticized the proposed Six Rivers National Forest Land Management Plan [LMP] and draft environmental impact statement [DEIS] and expressed support for the Department of Fish and Game [DFG] alternative to protect fish, wildlife and water quality.

According to Charles Murray, EPA's Assistant Regional Administrator for Policy and Management, the agency has rated the Forest Service documents as EO-2, meaning the plan lacked of "a sufficient level of mitigation to offset the potential for significant water quality impacts," and the DEIS did not include a full discussion of environmental effects.

EPA commented that the Forest Service must comply with the "Federal Antidegradation Policy" for water quality. This policy states that water quality better than the existing standards "will be maintained until it has been demonstrated ... that any change will be consistent with maximum benefit to the people of the state..."

EPA said of the Forest Service's Best Management Practices [BMPs] that where Forest Service activity "creates a water quality problem or causes a standards violation," the state and regional water boards may step in and regulate the Forest Service to protect water quality. They also suggested there is too much reliance on BMPs, recounting the Forest Service's failure to implement them in northwestern California.

The EPA is critical of the failure of the LMP to discuss the extent of herbicide spraying contemplated under the preferred alternative, including expected number of acres, types of herbicides, and the types of sites that would be sprayed. They believe the Forest Service should discuss in more detail the relationship of the LMP to the Forest Service Region V Vegetation Management Plan EIS.

The agency also asked the Forest Service to better explain how cumulative watershed effects were derived for each alternative, stating that potential negative effects are unclear in the DEIS.

In addition to these and other water quality concerns, EPA also raised a number of air quality issues, including the Forest Service's obligation to protect Class 1 air quality areas. Northwestern California Class 1 areas include the Redwood National Park and the Marble Mountains Wilderness Area. EPA considers any project within 60 miles of a Class 1 area to have the potential to degrade the area's air quality. EPA asked the Forest Service to identify specific measures it will use to prevent asbestos bearing rock from being used to surface roads.

These comments may be reviewed in the Northcoast Environmental Center library, or we will send them to you if you send a Self-Addressed Stamped-Envelope [SASE] to Six Rivers, c/o NEC, 879 9th Street, Arcata CA 95521.

—Northcoast Environmental Center

## "Best Management Practices" Are Less Than Great

How good are Best Management Practices [BMPs] at achieving the statutory goals of the Clean Water Act? The U.S. Forest Service has put a great deal of faith in the effectiveness of these so-called BMPs, but upon closer review, failures to comply with them can be readily found in the Shasta Trinity and Six Rivers national forests.

Last year in the Shasta-Trinity National Forest a citizen review team alerted the Trinity County Board of Supervisors to apparent BMP violations. The Board then asked the North Coast Regional Water Quality Control Board staff to review the allegations, many of which they found to be factual. BMPs were found to be violated about 40 percent of the time, including equipment operations and even burning in the streamside management zone [SMZs].

Not wanting to wait for the public to find BMP violations in the Six Rivers National Forest, staff of that forest reviewed BMP compliance in its four ranger districts. The resulting report, entitled "1986 BMP Compliance Reviews, October 15, 1986," summarizes their review of selected timber sales conducted over the last five years where the potential for conflicts were greatest. The report authors were cautious to state

that their findings "are not intended to reflect typical BMP implementation on this Forest."

On the eight sales reviewed, 99 violations of BMPs were observed, although the Forest Service says that only four of them "resulted in measurable impacts that clearly" violated state water quality standards. These four included fill material side cast into a stream, logging debris left in a stream channel, road fill sloughed into a tributary of Red Cap Creek, and a four-foot dam composed of channel gravel placed across the East Fork of Pilot Creek which "generates unnecessary sediments and precludes fish migration."

Some 15 other failures were deemed, at that time, to be minor water pollution sources. In all 52 BMP problems fell into four broad categories: 1) road fill stabilization conflicts (18), 2) SMZs not in compliance with standards (15), 3) logging equipment entered SMZs, and 4) mitigation measures outlined in EAs lacking specificity (9).

One Six Rivers staffer said the review was "positive because it got people to confront reality."

—Northcoast Environmental Center



Only a few 'giants' remain after other species are clearcut

Photo by Charlene Little

## Lawsuit to Stop Sequoia Logging

Continued from Page 1

cut, a total of 1,050 acres will have been decimated within five years.

Despite the Forest Service manual declaring that the redwood grove management objectives are to attain "the preservation of the species and of individual old-growth trees for public enjoyment," their decision to log remains steadfast. The manual further states that "no major activities such as campground or road construction, or timber cutting will be permitted." Such activities threaten to cause extreme root damage while exposing the redwoods to windthrow and inflicting upon them damage from other trees felled against them. This will ultimately imperil the groves' survival. Yet, as late as December of 1986, Regional Forester Zane Smith wrote that "we have not changed our long-standing Regional direction for the management of the Sierra Redwood Groves."

These groves, as well as the rest of the forest, provide habitat for a multitude of species, including the old-growth dependent spotted owl and various fish species like the golden trout, rainbow trout, brown trout, and

others. State Fish and Game fishery biologist Daniel Christenson blames the current adversely impacted stream habitats on unnaturally high levels of erosion and sedimentation due to the poor logging practices. He predicts more of the same in the groves if the harvests proceed.

Forest Service soil scientist Sarah Plocher also cites the issue of tree regeneration as critical, describing the future of long term timber management on the Forest as "bleak". Due to low rainfall, erosive soils, and steep terrain, the reforestation efforts of logged areas have met with little success. Two of the five attempts at reforestation by Ranger Districts resulted in 100 percent failure in 1982.

Thousands of signatures have been presented to the Forest Supervisor in petitions circulated by the Kern Kaweah chapter of the Sierra Club objecting to the redwood grove logging.

Joe Bogaard is an intern with the Coalition and is majoring in zoology at the University of California at Davis.





## PUBLIC LANDS

# Grazing on Federal Lands — Family Ranching or Public Ripoff?

by Lora Moerwald

Because cows and cowboys have played a significant role in popular American culture, Americans have historically tended to sympathize with the needs of those who make their home on the range—until lately. Recent attempts by the federal government to impose entrance fees to national parks and historical sites while it subsidizes private ranchers for grazing on public lands have sparked much controversy among the natives. Many Americans are now beginning to question the fairness of the government's methods in recovering operating costs for these public resources.

Currently, the government charges graziers \$1.35 per month to graze one cow on public land—less than it costs to feed a pet cat for for a week. While competitive market rates can range up to ten times higher, federal appraisers determined in 1983 that the average market value for grazing fees was \$6.53 on all federal lands and \$6.87 for private land. Those opposed the current \$1.35 fee claim that the government is unnecessarily subsidizing private graziers to turn public grass into red meat.

But ranchers contend that they bear more expenses grazing on public lands than they would by renting private lots, since they must share in upkeep costs of the lands, including costs for fences, water holes, cattle guards, as well as share land with recreationists. Bureau of Land Management [BLM] officials, on the other hand, claim that the fees cover only one-third of actual costs.

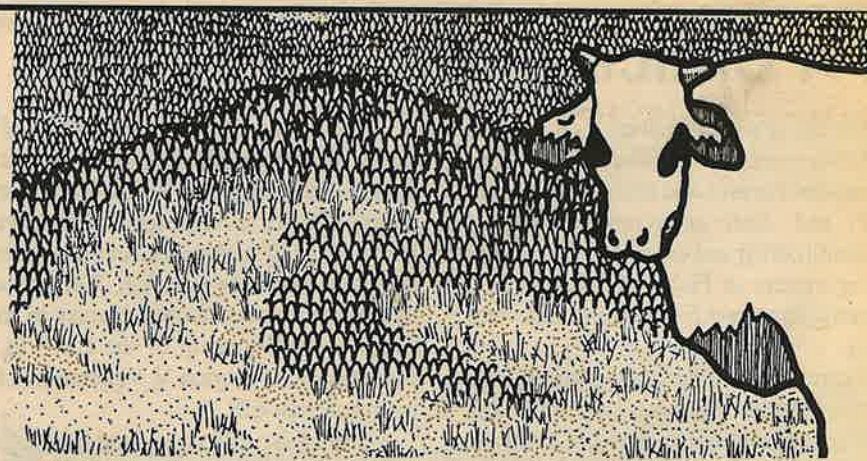
Under the auspices of the Taylor Grazing Act of 1934, the Department of the Interior is directed to provide for "orderly use, improvement, and development of Natural Resource Lands," and to "stabilize the livestock industry" by using the lands. Grazing fees have historically been kept

below market price to perpetuate the "family ranch." But the concept of such is nearly gone. Currently, only about five percent of the public lands graziers are "family ranches" with herds large enough to provide sole support of a family. In addition, these graziers provide only two percent of the beef the nation consumes.

Today, the Forest Service (FS) and BLM administer livestock grazing on about 307 million acres of public rangelands located in the 16 western states. BLM manages about 57 percent of these lands while FS manages the remaining 43 percent. In California, over five million acres of public lands are privately grazed.

Opponents of the low grazing fee claim that the sub-market price has contributed to overgrazing. Economists refer to this as a tragedy of the commons—a rapid depletion of public resources since these goods are "free" (or almost) to the public. Since ranchers do not pay full price to graze their herds, they can afford to graze more animals on the same parcel of land. Though BLM regulations limit the number of livestock that can be grazed on land and also prohibit grazing in certain areas at specified times of the year, few graziers comply with these regulations.

Overgrazing can destroy range vegetation, making lands at least 25 percent less productive over a 25-year period. When grazing cows stay in one spot for too long, cattle can trample the moss and lichen that normally help produce soil, eventually leading to massive soil erosion. As plant life diminishes, the animal species that depend on it diminish too. Soil and soil nutrients then wash away, and the entire ecosystem is left in limbo. In California alone, over 50 percent of the privately grazed public lands are in fair to poor condition, suffering severe to



extreme erosion.

Current economic losses in terms of topsoil alone on the western range is staggering; if topsoil is valued at only twenty-five cents a ton, annual soil loss per acre in the western states would equal about four times the current income from grazing. Between 1979 and 1984, BLM spent some \$43 million in collected grazing fees on improvements, but most of this went to improving the quality of the range for cattle.

Why does overgrazing and mismanagement of these public continue? Despite the fact that BLM can suspend or revoke a grazer's permit for non-compliance, these measures are rarely taken. Some blame this non-enforcement on burdensome enforcement requirements, while others point out that most of the key range management decisions are made at the local level, where BLM decision makers must live in the local communities with these rancher—making enforcement difficult to maintain.

For years, western ranchers have wielded an inordinate amount of power on public rangeland issues and regulations. Part of this power has been institutionalized in the Taylor Grazing Act, where BLM and FS officials are authorized to work directly with grazing district advisory boards—most of whose members are composed entirely of public lands graziers. And in Congress, western members have historically held a tight rein on public land policies.

Originally, grazing privileges on public lands were based on prior use. Other qualifications now include ownership or control of livestock and a sufficient base property (near the public land) to provide feed for the time animals are not grazed on the public

land, as well as proving a need for additional grazing in order to round out yearlong operations. Permits or leases are good for ten years, but current holders are given priority for renewal.

Some folks claim that raising grazing fees could mean bankruptcy for many of the ranchers who have borrowed money or bought property based on an artificial value of the grazing subsidies. Because ranchers can turn a higher profit on public lands by overgrazing them, permit values for these lands are artificially high. If the government attempted to reduce the allocation of livestock on these lands, the permit value would decrease and a rancher's net worth would sink.

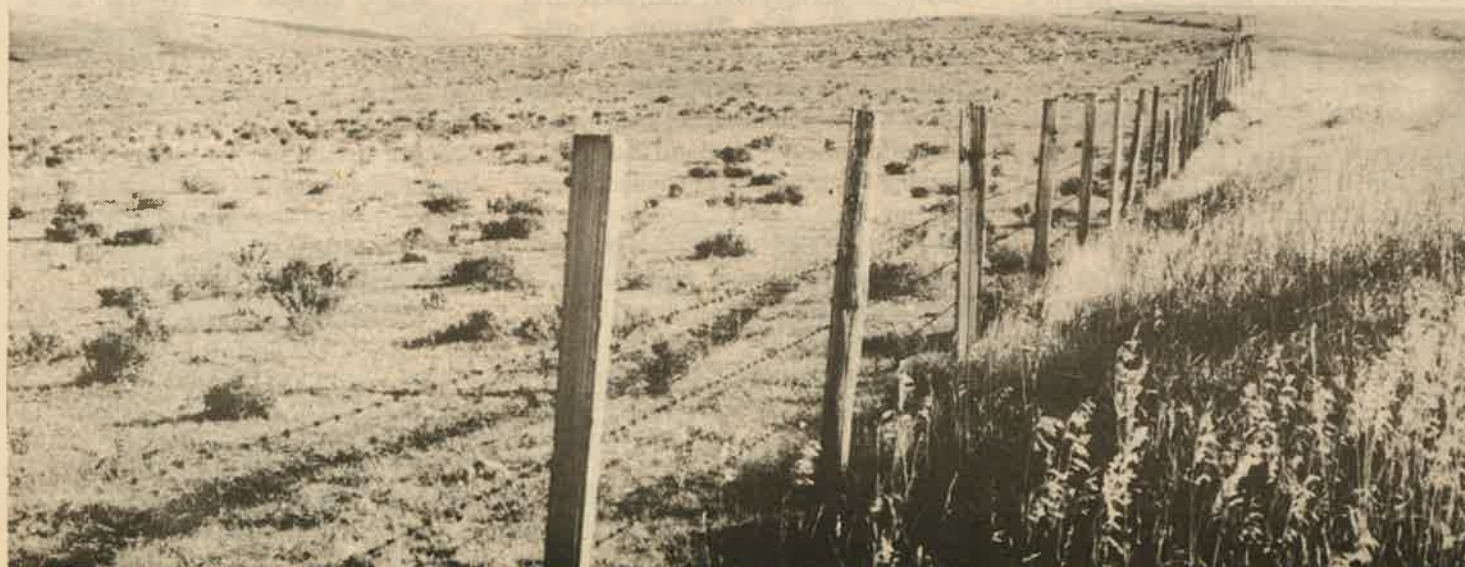
While ranchers cannot sell the grazing permit itself, they can sell the base property. Since the permit generally comes attached with the property, and the "permit value" enhances the value of the private property. Thus, private ranchers can profit enormously on a sale enhanced by a public good at no benefit to the public at all. Additionally, graziers can sublease their public land legally under BLM regulations, while the financial details do not have to be made public. Some ranchers charge sublease fees for as much as 12 times higher than the government fee. Raising the grazing fees to market rates would eliminate most of these profits made from subleasing.

Early last year, despite much hoopla from conservationists, Congress failed to adjust the grazing fee formula to bring fees up to current market rates. President Reagan then, issuing an executive order, indefinitely froze the monthly \$1.35 per cow price tag.

Conservationists argue that raising the fee could provide extra funds to provide real improvement for wildlife, soil, streams, and riparian zones. Additionally, boosting the fee would discourage overgrazing and help preserve what little critical riparian habitat remains in the West.

Recently, the Natural Resources Defense Council and eight other western-based environmental groups have challenged the grazing fee in a major lawsuit, arguing that the fee formula encourages overgrazing and denies the public of much-needed revenue to restore cattle-damaged range. In the meantime, cows will continue to graze will the judge chews on this one for a while.

Lora Moerwald is an intern with the CWC who is majoring in Environmental Policy Analysis and Planning at U.C. Davis.



An extreme, but clear example. Which side of the fence do think was heavily grazed?

Photo by Elliott Bernshaw



## Companion Book Available this Fall

## Audubon Specials Return this Summer

"Six Hours of Television That Will Bring You Closer to Extinction" is how National Audubon Society Specials are being billed for a summer return showing. Included will be the program on the California condor.

This fall, a companion book to the series, *Life in the Balance*, will be available. It covers a number of the Earth's ecosystems—skies, grasslands, forests, deserts, mountains, rivers, oceans, wetlands, polar regions, and islands—and the creatures in them. The book, by California author David Raines Wallace, will be reviewed in a later issue of the *Wilderness Record*.

The first six Audubon specials will be

broadcast by the Public Broadcasting System (PBS) on Sunday evenings at 8 p.m. as follows:

July 12	Galapagos, My Fragile World
July 19	Ducks Under Siege
July 26	Condor
August 2	The Mysterious Black-Footed Ferret
August 9	Common Ground: Farming and Wildlife
August 16	On the Edge of Extinction: Panthers & Cheetahs

The Audubon series is made possible through a generous grant from The Stroh Brewing Company.



## East Mojave Plan Lacks Strength

Continued from Page 1

scope of alternatives considered by the agency. Judy Anderson, the Sierra Club's Desert Committee Chair, says, "the BLM has started to take a step in the right direction, but they haven't gone nearly far enough! The comment period for this draft plan gives us a much-needed chance to point out where they need to do more, and where they simply haven't addressed the issues clearly or adequately."

The following are initial criticisms of the plan by conservationists:

- Although it presents some cosmetic modifications, the management plan shows no overall vision, no philosophical idea of protection or enhancement of the area's park-like character (examples of minor "cosmetic" changes are plans to post signs, build a new trail, publish guide brochures, landscape campsites, and reduce width of roadside camping corridors).

- The Environmental Assessment (EA) gives only one proposal for slight modifications here and there contrasted with a "no-action" alternative; it fails to present a full range of reasonable alternatives to consider.

- Campground expansion is proposed but without any evaluation of campground distribution; no concern is shown for proper campground placement for resource protection.

- Grazing modification plans are entirely lacking.

- The proposal to close certain specific vehicle routes, as listed in plan is commendable, but clarification and strengthening of rules regarding motorized access is needed.

- Mining withdrawals recommended by BLM (for 100,000 acres) do not generally include areas now important to mining.

BLM reaffirms its intention to "keep as much of the East Mojave available to mineral exploration and development as possible..."

- Statistics should be updated. Types of recreational use are estimated with little apparent rationale. The claim that 50 percent of visitors to the East Mojave engage in hunting, seems excessive. The category of 90 percent for "sightseeing" is not meaningful, especially as off-road vehicle exploring is lumped in with this!

- BLM failed to consider eliminating all shooting not associated with hunting, in order "to accommodate the large number of visitors who come to the East Mojave to pursue this activity..."

By addressing these concerns more carefully and completely in its final plan, the BLM can show its willingness to produce a viable program for improving East Mojave management.

Sending comments is very important. But unfortunately the BLM—after taking seven years to produce its draft plan—has allowed the public only sixty days in which to comment. It has also not yet made copies of the plan readily available. Thus, readers are urged to write a general brief comment letter as soon as possible, without waiting for a copy of the plan. If possible, start out with a note TODAY to request an extension of the comment period. If you wish to study the plan, ask them to send you a copy. Then, before August 3, send your comments to:

Everall G. Hayes, Area Manager

Needles Resource Area

P. O. Box 888

Needles, CA 92353

Vicky Hoover is the Chairperson of the Bay Chapter Wilderness Committee of the Sierra Club.

## 'I'd Flip for a T-Shirt —No Lion!'

Whether hanging around at the beach or just paddling around, you will want to order your CWC T-shirt sporting the Coalition's logo of black mountains beneath a blue sky, with yellow sand dunes in the foreground. KEEP IT WILD rings the top of the logo, with CALIFORNIA WILDERNESS COALITION beneath.



T-shirts are 100 percent double knit cotton. Regular T-shirts are available in white, tan, blue, and yellow in small [S], medium [M], large [L], and extra-large [EX]. A limited number of French-cut style T-shirts are available in white and pink in women's small, medium, and large. [Sorry, we are out of tan in large size at present.]

T-shirts are \$8.00 to CWC members and \$10.00 for non-members (sales tax included). Use the order form on Page 8. Clearly indicate

if you want regular or French-cut, size, color, and a substitute color. Please add \$1.25 postage and 75¢ for each additional T-shirt.

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The *Wilderness Record* is the bi-monthly publication of the California Wilderness Coalition. Articles may be reprinted; credit would be appreciated. Please address all correspondence to:

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Typesetting courtesy of agAccess for use of the LaserWriter; printing by the Davis Enterprise

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...to promote throughout the State of California the preservation of wild lands as legally designated wilderness areas by carrying on an educational program concerning the value of wilderness and how it may best be used and preserved in the public interest, by making and encouraging scientific studies concerning wilderness, and by enlisting public interest and cooperation in protecting existing or potential wilderness areas.



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