



WILDERNESS RECORD

Proceedings of the California Wilderness Coalition

November 1997

Forest Service to log potential wilderness area Salmon, spotted owl, and goshawk threatened by reckless logging plan

By Lori Cooper

The Klamath National Forest is once again demonstrating that it is hopelessly addicted to cutting old-growth trees and disqualifying roadless areas from ever becoming designated wilderness. The Upper South Fork Timber Sale on the Salmon River Ranger District is designed to log 7.5 - 10 million board feet of timber, build .6 mile of new road, and reconstruct 14 miles of road. Perhaps most disturbing of all, four units of the proposed sale slice into the Orleans Mountain Roadless Area. This is in keeping with a long-standing Klamath National Forest tradition of chipping away, bit by bit, at the remaining roadless areas on the forest.

The Klamath National Forest is planning to liquidate the little remaining old-growth which still exists in the area. As with most of the projects which the Forest Service has designed in the last several years, the good is mixed with the very bad. For example, in the Upper South Fork Sale, two activities which no reasonable environmentalist could oppose, prescribed burning and road decommissioning, are proposed. However, the "sanitation" of beautiful old-growth trees is proposed, along with group selection "patch cuts," ranging in size from half an acre up to six acres of large, old trees. The agency plans to cut critical habitat for the northern spotted owl, despite the fact that two new owl pairs with young were detected during surveys conducted this past spring and summer in preparation for this sale. In addition, there are four other owl pairs known to inhabit the project area.

Among other species which will be adversely affected by the logging in this sale are goshawks (there is a goshawk activity center immediately adjacent to the sale area), martens, fishers, Del Norte Salamanders, and two

species of lady's slipper: the clustered lady's slipper and the mountain lady's slipper.

Since this sale is in the "Matrix" (a land allocation designated under President Clinton's Northwest Forest Plan which offers less protection against logging than other land allocations such as Late Successional Reserves and Riparian Reserves), the Klamath National Forest argues that cutting old-growth and degrading spotted owl habitat in this area is appropriate. This is unfortunate, since there are plenty of plantations and younger growth in the Upper South Fork landscape which could be commercially thinned in order to reduce wildfire risk.

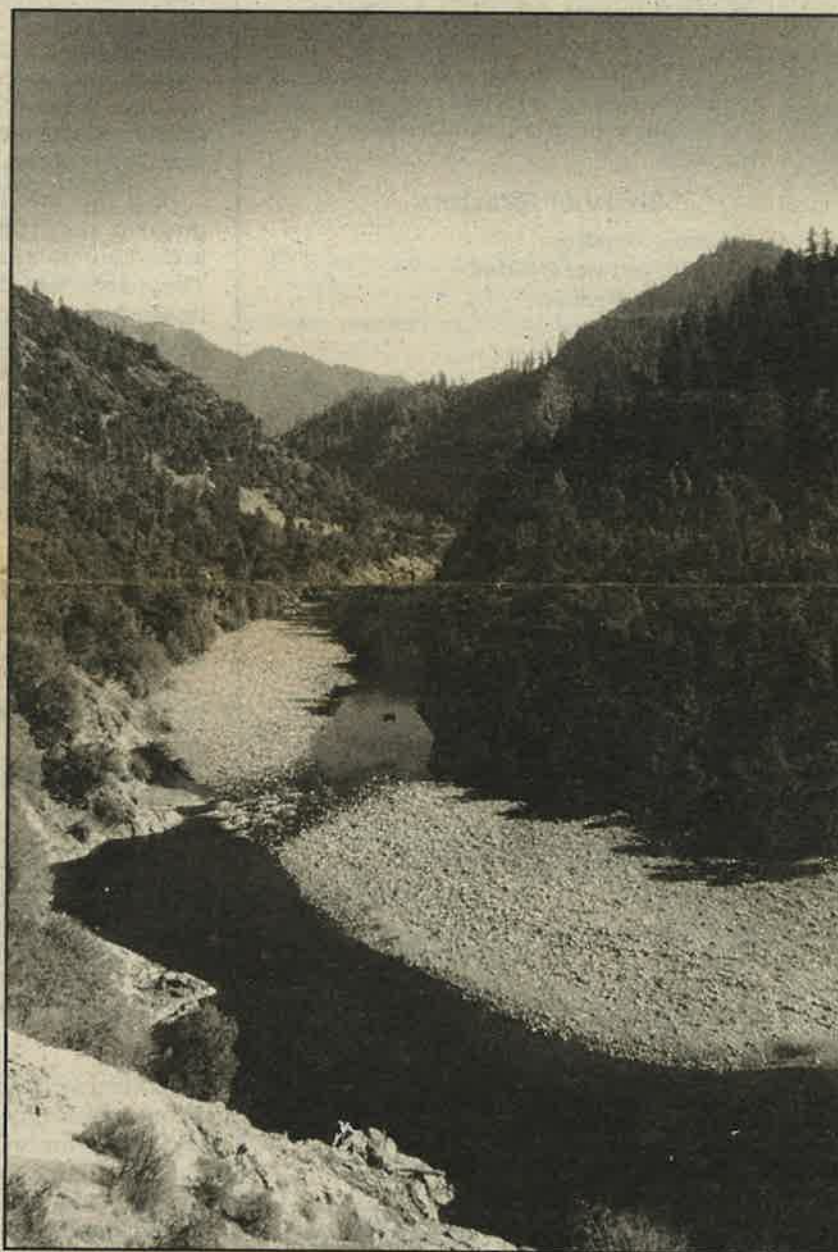
What you can do



Send a letter to Forest Supervisor Barbara Holder at 1312 Fairlane Road, Yreka, CA 96067 or call her at (916) 842-6131 and ask her to drop units in this sale which infringe on the Orleans Mountain Roadless Area (Units 67, 72, 73, & 98). Also ask her to spare the old-growth trees from this sale and to focus on plantation thinning and cutting smaller trees which pose a fire risk in this area. It is always helpful to send copies of your letter to Senators Feinstein and Boxer too. Comments must be postmarked by November 24, 1997.

To request an Environmental Assessment call the Klamath National Forest's Salmon River Ranger District at (916) 468-5351.

Lori Cooper works for the Klamath Forest Alliance in Etna, California.



The Salmon River. The headwaters of this key salmon and steelhead stream are threatened by logging in the Orleans Mountain Roadless Area adjacent to the Trinity-Alps Wilderness. Photo by Tim Palmer.

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California Wilderness Coalition
2655 Portage Bay East, Ste. 5
Davis, California 95616
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Phil Farrell
883 Loma Verde Ave
Palo Alto, CA 94303-4116



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California Wilderness Coalition

2655 Portage Bay East, Suite 5
Davis, California 95616
(530) 758-0380
Fax (530) 758-0382
info@calwild.org
www.calwild.org

...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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Executive Director
Paul Spitler, paul@calwild.org
Conservation Associate
Ryan Henson, ryan@calwild.org
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Herb Walker, hwalker@calwild.org
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Wilderness Record

Volume 22, Number 11
ISSN 0194-3030

The *Wilderness Record* is published monthly by the California Wilderness Coalition. Articles do not necessarily reflect the views of the Coalition. Articles may be reprinted; credit is appreciated. Subscription is free with membership.

Submissions on California wilderness and related subjects are welcome. We reserve the right to edit all work.

Editor
Herb Walker

Writers
Cameron Benson
Charlie Casey
Lori Cooper
Steve Evans
Ryan Henson
Paul Spitler

Photos & Graphics
Ryan Henson
M. McLeod
Lynn Gunn-Morrison
Tim Palmer
Jeanne Steele

Printed by the Davis Enterprise
on recycled paper

Coalition News

Monthly Report

Not far from where I once lived, there exists a small, undeveloped hillside. Though it is surrounded by a sea of development, this hillside has retained much of its original wildness. Native oak trees still drop their leaves each winter. An abundance of wildflowers bloom each spring. Hawks soar overhead while deer, fox, skunks and bobcats still call the place home.

I have spent much time on this small patch of native land. I've slept under its oak trees, pulled out encroaching exotic plants, and spent countless hours exploring—always with flower guide in hand—every nook and cranny. I am familiar with all of the trees that grow there, and most of the shrubs, grasses and flowers. I could show you the location of fox dens, where to call for great horned owls, hidden waterfalls, and all the best campsites. I'm not sure if the hillside even has a name. I've always considered it mine. And my love of this land is deeper than I can express.

It is this love that inspires our Adopt-a-Wilderness program. The program is designed to teach citizens from across California how to protect the land they care about. The premise behind the project is simple: people are more inspired to work for the preservation of lands that they know and love. Each of us has a story about a local landscape that we adore. Maybe it is a secret waterfall that only you know about. Maybe it is the home of a rare plant or animal. Maybe it is a rich old-growth forest, full of wonder and ancient wisdom. The areas may be as far apart as the Mojave desert and the Modoc plateau, but one tenet remains constant: the land we love most is the land we know best.

Through the Adopt-a-Wilderness program, we give average citizens the tools they need to protect local wildlands. We add to an individual's love of land the ability to protect that land. Citizens often call the CWC

to express concern about threats to local wildlands: a clearcut proposed next to their property, a new mine, even a highway widening. Many of these people have never worked on a conservation issue before. They are unfamiliar with environmental policy, and are overwhelmed by jargon-laden literature and complicated laws and administrative procedures. But they know they care about the land and want to protect it. These are the people we hope to reach with Adopt-a-Wilderness.

Through the Adopt-a-Wilderness program, we teach citizens the basics of wildland ecology, environmental law and policy, administrative procedure and grassroots organizing. Through a series of workshops, we give people all the tools they need to protect local wild areas. We cover everything from publicizing controversial projects to writing administrative appeals. The program has been extremely successful. To date, we have given dozens of workshops and trainings. Citizens trained through the program have already spared thousands of acres of pristine California wildland. If you live near a wild area that you care about and want to see protected, we need your help. Join our Adopt-a-Wilderness program and we'll teach you how to protect land forever.

And the fate of my little hillside? I now live 90 miles away, and have neither the time nor resources to commit to this tiny, but majestic, parcel. But those who live in the area still care. Developers recently proposed to build 90 full size condominiums on the land, and local residents fought back. They placed an initiative on the city ballot to increase the parcel tax in an effort to buy the land. The measure passed overwhelmingly and the hillside is now protected in perpetuity. The land is perhaps the most enduring gift citizens can leave future generations.

By Paul Spitler

A round of thanks

The Coalition recently received a much needed \$10,000 grant from the Peradam Foundation. The grant will be used to fund our Adopt-a-Wilderness, wildlands defense and wilderness planning efforts. This is the second year we have received funding from the foundation and we greatly appreciate their help. Thanks, Peradam!

♦♦♦

Delbert Williams recently began working at the Coalition as a full-time volunteer. Del recently moved to the area after living in Quincy where he worked to protect the Lassen National Forest. He is working on a comprehensive report on the status of California roadless areas. Del has been putting in long hours (unpaid!) at the Coalition and is an excellent addition to our team. Kudos to Del for his hard work.

♦♦♦

The annual CWC fundraiser will be held on Thursday, November 13 in San Francisco. Special thanks goes to Patagonia for their hard work in putting the event together. At last check, Patagonia had solicited 47 items for the silent auction, including a raft trip, tent and surfboard. Plenty of fine food and drink will be provided. We look forward to seeing you on the 13th!

♦♦♦

Mary Tappel recently gave the coalition \$3,500 to help fund our Adopt-a-Wilderness and wildlands defense work. Mary has been a long-time Coalition supporter and is the proud founder and caretaker of the Jim Eaton Wilderness Area in Sacramento. We greatly appreciate her support.

Desperately seeking volunteers...

We are looking for an accountant to help fulfill our accounting needs. If you are willing to donate a few hours, please give a call to Paul Spitler at the CWC office.

We also need a volunteer to update our web page. If you have experience in web page design and can help out, we need you!

Finally, we are always in need of qualified volunteers to work with our Geographic Information System software. Anyone with prior GIS experience (particularly ArcView) would be a tremendous help to the CWC.

Please send a complimentary copy of the *Wilderness Record* to:

Name _____

Address _____

Area of interest (if known) _____

May we use your name? _____

California Wilderness Coalition,
2655 Portage Bay East, Suite 5, Davis, CA 95616

Wild Rivers

Proposed suction dredge regulations pose threats to rivers and salmon

By Charlie Casey

California's Department of Fish & Game (DFG) is proposing changes to its suction dredge mining regulations that would open for dredging streams that are critical habitat areas for salmonids, including the spring-run chinook salmon which were recently listed as a candidate species for protection under the state's Endangered Species Act.

Suction dredging is a type of gold mining operation that uses gasoline-powered vacuum equipment to sift through the gravels of rivers and streams. Suction dredge miners are a fairly common sight on many waterways in California. With their noisy and powerful engines floating above riverbeds on small barges, suction dredgers can greatly alter stream channels and potentially disturb the aquatic resources necessary for salmon habitat and reproduction.

As an example, in the case of the endangered spring-run chinook, DFG proposes opening Deer and Mill creeks in Tehama County for seasonal dredging beginning in May of 1998. In the agency's just-released notice on the proposed changes in regulations, the department takes a questionable position that suction mining is appropriate for these streams because there is "an apparent abundance of suitable holding pools [for spring-run salmon]" and few if any barriers "to prevent adults [salmon] that might be displaced by dredging to move to alternate pool" (sic).

The agency goes on to maintain that since summer dredging operations are currently low on these streams, it "does not now appear to be deleterious to these [spring-run] fish." Of course, the department says that if dredge use does increase substantially, then it may have to reevaluate its impacts on fish.

This stance would not seem to bode well for the already profoundly reduced and damaged habitat of salmonid populations, especially for the spring-run salmon. The department is apparently willing to wait until deleterious fishery impacts actually occur before taking protective action. For endangered species such as

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spring-run salmon— whose population is quite small already— waiting for the impacts to appear before taking corrective action would seem at best to be an awfully reckless gamble with this noble fish.

Potential suction dredging on Deer and Mill creeks are not the only critical areas threatened by Fish and Game's proposal. The agency has identified several other rivers and creeks for seasonal suction dredge operations that also contain threatened or endangered fisheries. The stretch of Sacramento River devastated by the infamous

Cantara Loop toxic train derailment is also in line for suction dredging for the first time since the 1991 disaster that killed forty miles of that river.

Because of the number of rivers slated for continued or new dredging activities, it is impossible to include them all here. Activists should obtain a complete listing of proposed stream openings in order to assess the potential threats in their local or favorite areas and wildlife habitats.

What you can do



DFG has released a Draft Environmental Impact Report (DEIR) in conjunction with its proposed changes to dredging regulations. Copies of the report and the regulations may be found in a number of public libraries or obtained for a \$10 fee from the department by calling (916) 657-4029. The eight-page listing of proposed regulations for rivers can be obtained for free either from the department or from Friends of the River.

Comments on the DEIR are due November 13, 1997. Comments on the proposed regulations are due December 11, 1997. Address comments to: Department of Fish and Game, Inland Fisheries Division, 1416 Ninth Street, P.O. Box 944209, Sacramento, CA 94244-2090.

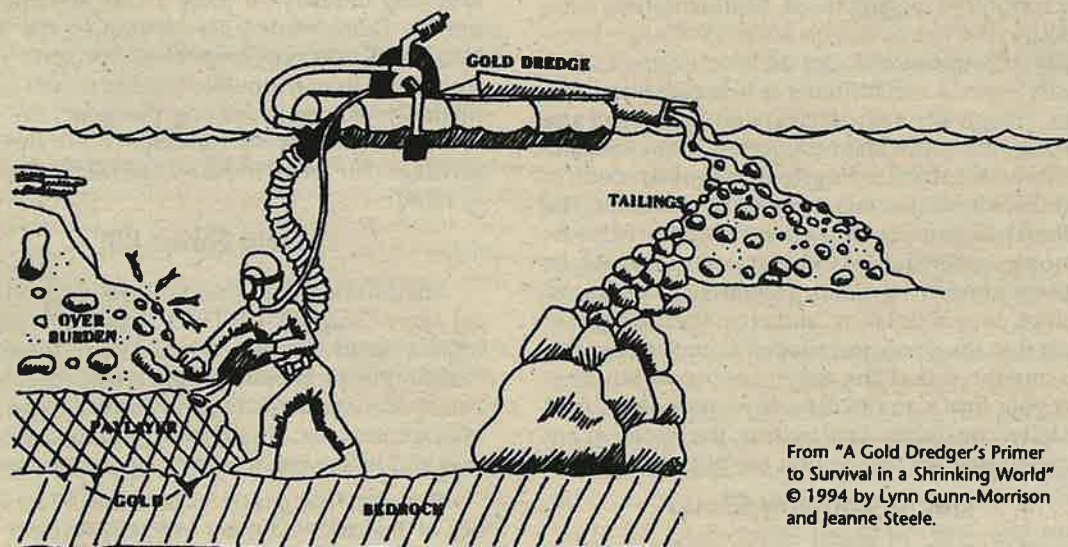
Among other issues, your letters should include the following comments:

- No state or federally threatened or endangered species (including candidate species) habitat areas should be opened (even on a seasonal basis) to suction dredging.
- No designated, eligible, or under consideration Wild & Scenic Act river segments should be opened to suction dredging.
- No state designated "Wild Trout Waters" should be opened to suction dredging.
- No suction dredging should be allowed in waters within the boundaries of state or federally designated wilderness areas.
- All costs related to suction dredging management and oversight by the California Department of Fish and Game should be borne by suction dredge permit fees, not hunting or fishing licenses.

Public hearings on the suction dredge regulations and the DEIR were held in October and early November. On December 11th at the state Resources Agency auditorium in Sacramento (1416 9th Street), a final public hearing will be held to certify the documents. The hearing begins at 7:00 pm.

For more information, contact Charlie Casey at Friends of the River in Sacramento by calling (916) 442-3155, ext. 218 or e-mail him at cec Casey@friendsoftheriver.org.

Charlie Casey is a Conservation Associate with Friends of the River.



From "A Gold Dredger's Primer to Survival in a Shrinking World" © 1994 by Lynn Gunn-Morrison and Jeanne Steele.

Wilderness News

Channel Islands plants listed under Endangered Species Act

By Cameron Benson

As a result of litigation from the Environmental Defense Center (EDC) in Santa Barbara, the U.S. Fish and Wildlife Service (FWS) listed thirteen Northern Channel Island plant species as threatened or endangered under the federal Endangered Species Act. All but one of the thirteen listed species exist within the boundaries of Channel Islands National Park, and nowhere else in the world.

Although the plants' entire historic ranges fall within the national park, and therefore should be protected, the FWS determined that ongoing adverse impacts from non-native livestock will drive the rare plant species to extinction. The negative impacts attributed to livestock include direct predation, trampling, and massive erosion of crucial topsoils.

EDC will continue their efforts to protect and preserve the biodiversity and unique island ecosystem of the Channel Islands National Park. For more information call EDC at (805) 963-1622. For background information about livestock-caused damage in the Channel Islands National Park see *Wilderness Record*, March 1997.

Cameron Benson is a Staff Attorney for EDC. Reprinted courtesy of the Environmental Defense Center.



Soft-leaved Indian paintbrush (*Castilleja mollis*), an endangered species, is now one of thirteen plants in Channel Islands National Park which were recently listed as threatened or endangered. All these plants face extinction unless destructive livestock operations on the islands are stopped. Photo by M. McLeod, courtesy of the California Native Plant Society.

Legislative Roundup

Exemption Excess

The Forest Service was forced to abandon an effort to exempt numerous timber sales from environmental review. A clause in the National Environmental Policy Act, the law that requires environmental review of all major federal actions, allows government agencies to "exempt" from review certain insignificant actions. Traditionally, these exemptions are limited to minor, non-controversial actions, such as routine maintenance of buildings, roads, or campgrounds; trail reconstruction, or approval of special use permits

on national forest land. Currently, any timber sale of live trees over 250,000 board feet (about 50 log trucks) requires environmental analysis. (A board foot is a piece of wood one foot by one foot square and one inch high.) The Forest Service proposed to exempt timber sales up to 3 million board feet from environmental review—thus increasing twelve-fold the volume of timber that could be sold without environmental review. The new policy could have led to a majority of logging projects in California being exempted from environmental review. Fortunately, the agency memo proposing the idea was leaked to environmental groups, who convinced the Clinton Administration to quash the proposal.

More Sneak Attacks

The 1998 Interior Appropriations Bill contains a number of anti-environmental riders, prompting environmental organizations to urge President Clinton to veto the measure. Among other things, the bill would: ban the reintroduction of grizzlies to the northern Rockies, lift the export of logs from the Pacific Northwest, and eliminate the cap on federally subsidized logging roads. Representatives Peter DeFazio (D-OR) and George Miller (D-CA) are circulating a Congressional sign-on letter urging a Presidential veto. A similar letter is being circulated by Reps. Joseph Kennedy (D-MA) and Elizabeth Furse (D-OR), two of the main supporters of the measure to eliminate subsidized logging road construction in national forests that failed in June by two votes. The Miller/DeFazio letter, which has the support of House minority leader Richard Gephardt (MO), says that the anti-environmental riders "represent a broad assault on our public lands" and urges the President to insist that the riders are stripped from the bill. "We are convinced that the American people will support your firm stand in defense of our public land" the letter concludes. As of writing, the President has not indicated his position on the bill.

Quincy Logging Group

Senator Feinstein's Quincy Library Group bill, S. 1028, was approved by the Senate Energy and Natural Resources Committee on October 22 and awaits final passage on the Senate floor. The bill requires

the Forest Service to carry out a massive five year logging experiment on the Lassen, Plumas and Tahoe National Forests. The committee made only minor changes to the bill and left intact the disastrous language calling for greatly increased logging on the affected forests.

The Forest Service proposed to exempt timber sales up to 3 million board feet from environmental review—thus increasing twelve-fold the volume of timber that could be sold without environmental review.

Meanwhile, firefighters held a press conference in Sacramento in October to denounce the bill, stating that it will not reduce the threat of wildfire and may put firefighters at risk. The bill "constrains the flexibility of response that firefighters need to do their jobs and survive," U.S. Forest Service Smokejumper Joel Fox told the Associated

Press. In an October 21 editorial, the San Francisco Chronicle called the bill "fraught with problems" and said it is "based on a flimsy scientific premise." The Chronicle urged the Senate to "include amendments that would limit the firebreak experiment to a small test area, protect all known environmentally sensitive areas and reduce the amount of taxpayer subsidy in this Sierra logging venture."

Grazing Bill on the Mooove

Rep. Bob Smith's (R-OR) "Welfare Ranching" bill, H.R. 2493 passed the House floor by a vote of 242-182 on October 30. Representative Sherwood Boehlert (R-NY) worked with Smith to remove some of the worse provisions of the bill before it was voted on by the House. The Clinton administration and an alliance of environmental groups are still opposed to the measure. The President has threatened a veto of the bill if it reaches his desk, citing concerns that it would "undercut the ability of federal land managers to protect the land."

The bill would lower grazing fees for public lands ranchers to a level lower than that proposed by the ranching industry—a mere \$1.60 per animal per month. (Meanwhile a day hiking in the Angeles National Forest now costs \$5 per person.) The bill would also limit the public's ability to halt environmentally damaging grazing practices, and would redefine public lands' grazing as a right, not a privilege. The term "industry wish list" again comes to mind.

Craig Forest Bill

Environment and Energy Weekly reports Senator Larry Craig's (R-ID) Public Lands Management Improvement Act of 1997 (S. 1253), intended to "streamline forest policies" and rework the National Forest Management Act and Federal Land Policy Management Act, is being rewritten following hearings and before being marked up in committee.

Conservation groups oppose the bill for a number of reasons. Contact Western Ancient Forest Campaign for more information: (202) 876-3188.

Source: GREEN, the GrassRoots Environmental Effectiveness Network.

Bureau of Land Management

BLM cracks down on illegal road construction

By Ryan Henson

One of the largest unprotected wildlands in northern California is the Eden-Thatcher wilderness complex in northeastern Mendocino County. Composed of the Bureau of Land Management's Eden Valley and Thatcher Ridge wilderness study areas (WSA), the Mendocino National Forest's Elk Creek and Thatcher roadless areas (RA), as well as additional public lands, the Eden-Thatcher area comprises over 65,000 acres of critical wildlife habitat along the wild-and-scenic Middle Fork Eel River and several of its key tributaries. A land of great diversity in both plant and animal life, the Eden-Thatcher region is splendidly isolated from the hustle and bustle of the rest of the Golden State.

At least that was the case until, according to the Bureau of Land Management (BLM), a citizen named Mr. Fresquet illegally bulldozed 3,500 feet of road into the Eden Valley WSA to reach a portion of his ranch across public land. Mr. Fresquet's illegal road construction went unnoticed until the Forest Service saw the road construction from the air and reported it to the BLM. The BLM was quite concerned because the area is a potential wilderness and the affected watersheds support threatened salmon and steelhead downstream.

Now the BLM is requiring Mr. Fresquet to "fully decommission" the road at his own expense. Full decommissioning involves restoring the roadbed to such an extent that it looks as though the road was never built in the first place. This will involve several thousand dollars in expenses for the road-building rancher, including over \$1,180 for the purchase of native plant seeds alone.

Conservationists applaud the BLM's efforts to protect and restore the wilderness values of the Eden-Thatcher region. The primitive nature of the area and its considerable botanical, wildlife, and watershed values make it worth preserving. For this reason, the California Wilderness Coalition has been seeking to have the Eden-Thatcher region designated in its entirety as the "Yuki Wilderness" for several years now in honor of the native people who



The BLM's Eden Valley Wilderness Study Area (background), as seen from the Mendocino National Forest's adjacent Elk Creek Roadless Area. Both areas are part of the proposed 70,000-acre Yuki Wilderness. Photo by Ryan Henson.

dwelt there prior to European settlement. To achieve this goal, we cannot tolerate ranchers running bulldozers roughshod across this critical wild area.

What you can do



Write to the BLM and thank the agency for taking decisive action to restore the Eden Valley WSA after the road construction incident. Also, remind the agency that the conservation community wants the proposed Yuki

Wilderness strongly protected so that it may be officially designated as wilderness by Congress in the near future.

Write to:

BLM, Arcata Resource Area
ATTN: Bruce R. Cann
1695 Heindon Road
Arcata, CA 95521

Ryan Henson is the Conservation Associate for CWC.

Update: King Range ORV closure moving ahead

By Ryan Henson

Your calls, e-mail messages, and letters have made a real difference: for despite intense pressure from off-road vehicle (ORV) enthusiasts, the Bureau of Land Management (BLM) has decided to proceed with its plans to close Black Sands Beach in the 64,000-acre King Range National Conservation Area (NCA) to motorized vehicles. The closure would stretch 3.5 miles from Telegraph Creek to Gitchell Creek on Black Sands Beach.

The next step in the process is for the public to review the BLM's environmental assessment (called the King Range NCA EA) for the proposed closure and comment on the proposal.

The King Range NCA EA reveals that backpacking use of Black Sands Beach has increased fourteen fold from 1973 to 1996, while ORV use has decreased by 15-20 percent in the same period. The EA also cites a recreation study of the King Range NCA conducted by Humboldt State University in Arcata, California which found that 62 percent of hikers and backpackers had "conflicts" with motorized vehicles along Black Sands Beach. The EA also

cites a U.S. Forest Service study from 1993 which found that non-motorized recreationists visited the King Range primarily because of its "undisturbed natural setting" and lack of motorized vehicles. As a result, the BLM has concluded that it must respond to these changes in public opinion and recreation-use patterns by closing Black Sands Beach to vehicles.

There are also ecological and political reasons for closing the beach to ORVs. Currently, ORVs are damaging fragile sand dune ecosystems, frightening wildlife, causing erosion, and depositing large amounts of trash. In addition, since Black Sands Beach is the last remaining portion of the King Range NCA accessible to ORVs, closing it will help reduce opposition to designating the area as wilderness in the near future (motorized vehicles are only rarely allowed in designated wilderness areas, and even then only under extraordinary circumstances).

Closing Black Sands Beach to ORVs will thus help pave the way for wilderness designation for the King Range NCA, preserve and restore damaged ecosystems, and improve wilderness-compatible recreation opportunities. If the BLM and conservation community can get rid of these kinds of management conflicts early on,

wilderness designation for the area will be that much easier to attain.

What you can do



Once again, the BLM could use your support for closing Black Sands Beach to ORVs. You can express this support by submitting comments on the EA by December 12, 1997. To submit comments on the EA, please write a letter* to:

Lynda Roush, Area Manager, BLM Arcata Resource Area, 1695 Heindon Road, Arcata, CA 95521

Stress that you fully support the preferred alternative outlined in the EA and wish to see the closure implemented as soon as possible. Also mention that you would like to see the NCA protected as wilderness. It is always helpful to send copies of such letters to one or both of California's senators at:

The Honorable Barbara Boxer or the Honorable Dianne Feinstein, Senate Office Building, Washington, DC 20510

* Ms. Roush will also accept comments via e-mail at lroush@ca.blm.gov or by fax at (707) 825-2301.

Wilderness Activism

Adopt-a-Wilderness campaign on the move Activist trainings coming to a wilderness near you...

By Ryan Henson and Paul Spitler

Who wants to be the treasurer? Who wants to coordinate our meetings? Should we have a spokesperson? What should our name be?

Believe it or not, these are the questions that have wildlife, trees, and other living things breathing a sigh of relief in the Tahoe and Lassen National Forests as new groups have formed to defend these Sierra Nevada public wildlands from destruction.

With this ongoing organizing and recruitment effort, CWC and its allies hope to expand the ranks of the grassroots conservation movement and win new friends for even the most neglected areas of public land. To protect California's threatened wildlands in the short and long-term, we must build and support an active and engaged citizenry capable of participating in the public land-use decision-making process

The Forest Issues Group (FIG) recently organized to work on the Tahoe National Forest. FIG has already had a significant impact on the management of the national forest by stopping one large timber sale and modifying others. Simply having increased public scrutiny alone is often enough to make the Forest Service mind itself.

The Lassen Forest Preservation Group (LFPG) also recently formed to defend the Sierra Nevada/Cascade ecosystems of the region, and, like FIG, has succeeded in making the Forest Service more responsive to public concerns about ancient forests and roadless areas. I recently attended one of their meetings, and I was impressed by their increasing skill and sophistication in forest activism.

These are just two of the new groups CWC, along with the Sierra Nevada Forest Protection Campaign (SNFPC), and Friends Aware of Wildlife Needs will recruit, train, financially support, and advise over the next year in the

Sierra as well as other key regions around the state to bring new vision, energy, and creativity into the public lands conservation movement. Both of these groups are filled with talented and enthusiastic folks whom we fully expect will become everyday conservation heroes and heroines in the near future.

With this ongoing organizing and recruitment effort, CWC and its allies hope to expand the ranks of the grassroots conservation movement and win new friends for even the most neglected areas of public land. To protect California's threatened wildlands in the short and long-term, we must build and support an active and engaged citizenry capable of participating in the public land-use decision-making process. We have learned through many years of working with grassroots activists that many of the provisions of federal environmental laws such as the National Forest Management Act, National Environmental Policy Act, Endangered Species Act, Clean Water Act and Forest Service Handbook are complicated and difficult for the layperson to understand. In fact, while the laws often encourage—and in some cases require—public participation in the decision-making process, would-be citizen activists are often discouraged from becoming involved because they do not understand what exactly to do, find the process confusing and do not feel their voices make a difference.

In our many years of working with grassroots activists, we have also learned that when citizen activists understand the process and have the necessary support and resources, they can be very effective advocates for protecting our wildlands. With the continuing assault on our last remaining wildlands, grassroots activists fill a vital niche for in many instances they live near the places they want to protect and therefore are familiar with the potential effects of proposals put forward by the land management agencies.

In order to level the playing field and make the federal land management decision-making process more accessible to citizens, CWC, through the Adopt-a-Wilderness program, is creating a vibrant statewide network of citizen wildland guardians capable of defending wildlands from short- and long-term threats, creating a statewide proposal for the permanent protection of California's remaining wildlands, and reaching out a rural constituency for the protection of California wilderness.

To accomplish these goals, we recruit interested citizens, hold training workshops and meetings to teach people how to protect their public lands, provide materials, resources, and ongoing support to new and seasoned activists, develop proposals for the permanent protection of California wildlands, and build a base of support for the protection of these lands.

Through this project, we work to ensure that wild areas are adequately defended from short-term threats while working to ensure their permanent protection. We have separated the project into two components: grassroots organizing and wilderness planning. These two approaches are complementary and have proven to be the most effective way to ensure wildland protection.

Through the grassroots organizing effort, we work to recruit and train citizens from across California to become wildland guardians. These citizens form a solid base

of support for the protection of wilderness in California. Through the wilderness planning effort, we are developing wilderness proposals for the remaining California public wildlands. Once completed, these proposals will serve as the foundation for a long-term wilderness protection campaign. In the short term, the wilderness proposal will guide the efforts of citizens working to defend wildlands from immediate threats.

CWC is one of the few California conservation organizations actively engaged in teaching citizen activists to defend threatened wildlands (in the Sierra Nevada, our training efforts are closely coordinated with the talented staff of Friends Aware of Wildlife Needs). Each year our staff spends a considerable amount of time recruiting, training, advising and coordinating the efforts of California's public land conservation activists. CWC is the only organization that works on a statewide level to coordinate groups that work to protect wildlands and serves as a link between numerous smaller groups.

Sound interesting? If you live in or near any of California's Bureau of Land Management holdings, or any of our National Forests, we would like you to become an active steward and guardian of these lands. The list below outlines our tentative schedule for regional organizing:

Land Management Unit	Target Training Date
Lassen National Forest	1997*
Plumas National Forest	1997
Tahoe National Forest	1997*
Modoc National Forest	1997
Shasta Trinity National Forest	1998
Mendocino National Forest	1998
BLM California Desert District	1998
Susanville BLM District	1998
Six Rivers National Forest	1998
Sierra National Forest	1998
Sequoia National Forest	1998
Toiyabe National Forest	1998
Lake Tahoe Basin Management Unit	1999
Los Padres National Forest	1999
San Bernadino National Forest	1999
Cleveland National Forest	1999
Angeles National Forest	1999
Ukiah BLM District	1999
Inyo National Forest	1999

* Activist training completed

In the short-term, we have trainings planned for November 20 (Alturas) for the Modoc National Forest, November 25 (Quincy) for the Plumas National Forest, and December 9 (Mariposa) for the Sierra National Forest. Call Ryan Henson at the CWC office for details.

In the meantime, if you live in or near either the Lassen or Tahoe forests, you can contact FIG by calling Don Jacobson at (916) 272-1433 or e-mail him at dj@oro.net; contact LFPG by calling Steve Sayre at (916) 345-5698.

Wilderness Forum

Letters

Emigrant Wilderness dams and Forest Service policy

Your August 1997 article on dams in the Emigrant Wilderness raises some interesting issues, particularly when viewed in light of the very similar issues raised by the Josephine Bradley Memorial Ski Hut, which before its recent demolition was located in the Granite Chief Wilderness.

The characteristic that both the Emigrant Wilderness dams and Bradley Hut share in common is that they all pre-existed the designation of wilderness. The significance is that, in the case of both dams as well as backcountry shelters, Forest Service standards for managing wilderness areas draw a clear distinction between new and pre-existing structures.

Forest Service wilderness management standards which allow for the continued existence and use of pre-existing primitive shelters and water control structures are subject to the qualifications that such structures continue to serve the public purpose for which they were originally constructed and that they not in some way apart from their mere existence impair the wilderness values of the area. In the case of the Emigrant Wilderness dams the Forest Service, in response to the CWC's appeal, determined that the dams no longer fulfill the public purposes for which they were constructed for the reason that, as of the present, their benefits to fisheries and to recreation are minimal. Moreover, the Forest Service found that the Environmental Assessment (EA) prepared by Stanislaus National Forest (SNF) to support retention of the dams failed to evaluate adequately the significant adverse impacts identified by CWC in its appeal of dam maintenance on the wilderness environment. The article documents other adverse impacts of the dams. The case for removal of the dams under the Forest Service wilderness management standards seems well supported.

A different picture emerges when one applies a similar analysis to Bradley Hut. Since 1957, and until its demolition, Bradley Hut continued to serve well its original purposes—as a backcountry emergency winter shelter and as one hut in a series to foster the use and enjoyment by nordic skiers of the area. Moreover, during the months of debate within the Sierra Club leading up to its demise the only concerns apart from its mere existence raised over

the hut's effect on the wilderness were over the maintenance of the hut's outdoor privy and by the gathering of downed wood as fuel for the hut's woodstove. While these concerns were both legitimate, they were also both eminently mitigable. The case for demolishing Bradley Hut seems to be, at minimum, open to serious question.

The article also takes the position that the Wilderness Act automatically trumps the National Historic Preservation Act (NHPA) and requires the demolition of structures even if they are eligible for listing in the National Register of Historic Places (NRHP). It is worth at least noting in this connection that the Wilderness Act itself provides that a wilderness "may also contain...features of...historical value," and that "wilderness areas shall be devoted to the public purposes of...historical use." Whatever the merits of this position, it is not one that is shared by the Forest Service. The Forest Service Manual provides in clearest possible terms that wilderness management decisions regarding resources eligible for listing shall be made in accordance with guidance received under the NHPA. Rather than relying on the argument stated in the article, wilderness advocates would do more to advance their cause by directly challenging a determination that a resource in a wilderness area is eligible for listing in the NRHP, or by arguing that notwithstanding such eligibility, the adverse effects of the resource on the surrounding wilderness environment warrants its removal.

One last point. The article strongly implies that by "reversing herself," The Deputy Regional Forester handling the CWC's appeal regarding the dams upheld the decision of the Stanislaus NF to retain the dams. As the CWC itself must well know, this is simply not the case. The Deputy Regional Forester required the national forest to issue a new decision notice regarding the dams in light of the deputy forester's determinations (among others) that the national forest's original decision that the dams continue to benefit fisheries and recreation was not supported by the record, and that the EA failed to evaluate adequately the environmental impacts of dam maintenance. The article does not tell us what new decision the Stanislaus NF issued after remand, but it is hard to imagine how it could reaffirm its original decision under

Calendar

November 20 Adopt-a-Wilderness meeting in Alturas for the Modoc National Forest. Call Ryan Henson at (530) 758-0380 for details.

November 24 Comment deadline on the Upper South Fork Timber sale in the Klamath National Forest. See article on page 1.

November 25 Adopt-a-Wilderness meeting in Quincy for the Plumas National Forest. Call Ryan Henson at (530) 758-0380 for details.

December 7 Medicine Lake geothermal project opponents meeting. The meeting will be held in Burney at the Pitt River Tribal Health Center at 1pm. Call Ryan Henson at (530) 758-0380 for details.

December 9 Adopt-a-Wilderness meeting in Mariposa for the Sierra National Forest. Call Ryan Henson at (530) 758-0380 for details.

December 12 Comment deadline on the proposal to close Black Sands Beach in the King Range National Conservation Area. See article on page 5.

these circumstances. Moreover, a decision by the Stanislaus to require removal of the dams is the only outcome that makes sense in light of Doolittle's bill mandating the maintenance of the dams.

John Bowers
Oakland, CA

The author responds:

There are three main points I want to address: 1) Reference to Forest Service policy on structures in wilderness; 2) Structures eligible for the National Register of Historic Places; 3) The decision by the Deputy Regional Forester on the CWC appeal.

1) Essentially, Mr. Bowers is upset that the Forest Service chose to do the right thing for the wilderness resource, rather than provide an exception to the prohibition of structures in wilderness. I think the important point is that when an exception is made, it makes it easier to argue for additional exceptions everywhere else. Because of the leadership the Sierra Club demonstrated in supporting the decision to remove the hut, it will be easier to reject demands to retain structures in other places. This is certainly the case in the Emigrant, where many of the same folks promoting the dams are also pushing the maintenance of several cabins for personal use.

2) The article does not take the position that "the Wilderness Act automatically trumps the NHPA", but rather that the NHPA does not trump the Wilderness Act. Put another way, the article takes the position that the Wilderness Act requires managing uses of wilderness to preserve the wilderness character and does not provide that maintaining eligible structures will take priority over that requirement. Mr. Bowers is correct in pointing out that decisions regarding NRHP eligible structures must be made according to NHPA guidance. That means that certain procedures and requirements must be followed in

determining the disposition of an eligible structure, but it does not require that they be maintained. Section 4(b) of the Wilderness Act does refer to historical use as one of the purposes of wilderness, but also states that the purposes of wilderness will be managed so as to preserve its wilderness character. This does not require that eligible structures be demolished, only that appropriate action be taken to manage the structure in a manner that preserves the wilderness character. In some cases that may be removal, in other cases slow decay over time. The presence of cabins, dams and other such structures has not precluded many areas from becoming designated wilderness. In general, they have been considered "substantially unnoticeable" in the context of the Wilderness Act, but continued maintenance and use would have to be considered as perpetuating a "permanent improvement." It is also important to consider that the Act puts emphasis on allowing natural processes to prevail, and allowing a structure to decay naturally meets that intent. While I agree that there may be cases where a determination of eligibility might be challenged, I feel it is far more important to stress the point that eligible structures do not override the requirement of the Act to preserve wilderness character.

3) Here are the facts of the CWC appeal: The Deputy Regional Forester (DRF) agreed with the appeal and issued a decision to reverse the Forest Supervisor's decision and directed that the dams be removed within five years. Three weeks later, after substantial local outcry and political pressure, the DRF backpedaled and claimed her

decision had been "miscommunicated." Instead of requiring the removal of the dams, she was now directing the Forest Supervisor to issue a new decision notice that would be appealable. She further stated "I would like to say clearly that my 4/13/90 statement that 'the record indicates that all dams should be removed' should not be interpreted as my predisposition affecting the new decision. My 4/13/90 statement is based on the current record (EA and study report). If, after review of the EA, the Forest modifies the record, then the new decision will be based and judged on that new record." Now, technically, that is not a "reversal" in the sense that she decided to completely change her mind and support the original decision. However, I would consider that as classic CYA that certainly sends a very different message than her first letter. It sounds to me like "If you can come up with some good reasons to get us off the hook, we'll support the original decision." Consequently, the Forest attempted to do just that, coming up with equally inadequate (and invalid) reasons to justify the original decision. A draft of a new EA was written in this endeavor, but was eventually dropped in the face of internal criticism and in favor of making the decision in the context of developing new management direction for the wilderness as a whole. This resulted in a draft EIS that included a proposal to maintain the seven eligible dams. At this time, no final decision has been reached.

Steve Brougher, with the Central Sierra Wilderness Watch, is a former employee of the Stanislaus National Forest.

Coalition Member Groups

Ancient Forest Defense Fund; Branscomb Angeles Chapter, Sierra Club; Los Angeles Back Country Horsemen of CA; Springville Bay Chapter, Sierra Club; Oakland Bay Chapter Wilderness Subcommittee; S. F. California Alpine Club; San Francisco California Mule Deer Association; Lincoln California Native Plant Society; Sacramento Citizens for Better Forestry; Hayfork Citizens for Mojave National Park; Barstow Citizens for a Vehicle Free Nipomo Dunes; Nipomo

Committee to Save the Kings River; Fresno Conservation Call; Santa Rosa Davis Audubon Society; Davis Desert Protective Council; Palm Springs Desert Subcommittee, Sierra Club; San Diego

Desert Survivors; Oakland Eastern Sierra Audubon Society; Bishop Ecology Center; Berkeley Ecology Center of Southern California; L. A. El Dorado Audubon Society; Long Beach Friends Aware of Wildlife Needs (FAWN); Georgetown

Friends of Chinquapin, Oakland Friends of Plumas Wilderness; Quincy Friends of the Garcia (FROG); Point Arena Friends of the Inyo; Lee Vining Friends of the River; Sacramento Fund for Animals; San Francisco

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Loma Prieta Chapter, Sierra Club; Palo Alto Los Angeles Audubon Society, West Hollywood Los Padres Chapter, Sierra Club Marble Mountain Audubon Society; Etna Marin Conservation League; San Rafael Mendocino Environmental Center; Ukiah Mendocino Forest Watch; Willits Mono Lake Committee; Lee Vining Mt. Shasta Area Audubon Society; Mt. Shasta Mountain Lion Foundation; Sacramento Native Habitat; Woodside Natural Resources Defense Council; S.F. NCRCC Sierra Club; Santa Rosa Nordic Voice; Livermore Northcoast Environmental Center; Arcata People for Nipomo Dunes Nat'l. Seashore; Nipomo

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Save Our Ancient Forest Ecology (SAFE); Modesto

Sequoia Forest Alliance; Kernville Seven Generations Land Trust; Berkeley Seventh Generation Fund; Arcata Sierra Club Legal Defense Fund; S. F. Sierra Nevada Alliance; South Lake Tahoe Sierra Treks; Ashland, OR Smith River Alliance; Trinidad Soda Mtn. Wilderness Council; Ashland, OR South Fork Mountain Defense; Weaverville South Yuba River Citizens League; Nevada City

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"I don't think simply because we pass this bill that we ought to be entertaining every group that meets at a library and decides they want to run a national forest"

— Senator Dale Bumpers (D-AR), after withdrawing his amendment to the Quincy Library Group bill, which would have stopped similar plans for assuming control of other national forests until the end of the QLG five-year pilot project.

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