

# aulderness record

PROCEEDINGS OF THE CALIFORNIA WILDERNESS COALITION

P.O. Box 429, Davis, Ca 95616

September-October, 1978

No. 5

## RAREII: THE LAST 30 DAYS

Before 1978 is out, the have as great an impact on U.S. Forest Service intends to decide, once and for all. the fate of 62 million acres of your "de facto wilderness"--the last remnants of wild land within our National Forest System.

all about. (RARE II is the acronym for the Forest Service's second "Roadless Area Review and Evaluation" program.)

Powerful anti-wilderness lobbies are leaning hard to get most of the remaining roadless land within our national forests officially declared "non-wilderness," dismissed from possible preservation once and for all. These wild forest and grasslands will not be preserved, or even given the benefit of thorough study after 1978, unless you and every other wilderness supporter make your opinions heard.

Ths most important vehicle for your opinion is a letter to the Forest Service office in No letter your region. you've written before could the fate of America's last national forest wilderness. If this seems a lot to ask,

look at it this way. Wilderness opponents and the Forest Service want to make decades-worth of decisions This is what "RARE II" is in one fell swoop. Think of what you would do to save wilderness in the course of the years those decisions should take--and make the extra effort now.

> Enclosed is the information you need to write an effective letter on RARE II. Your letter will be especially effective if it mentions individual roadless areas.

CWC members who have indicated interest in specific regions are being sent alerts on individual roadless areas which conservationists feel merit wilderness designation. Great expertise on the RARE process is not important but your comments to the Forest Service are vital. Your voice is needed as

never before. Please read through this newspaper and write--before the end of September.



Recent Southern Pacific Land Co. logging of Shasta Red Fir on northeast slope of Mount Shasta. This area was within the Forest Service Wilderness Study Area at the time it was logged. To protect your favorite wilderness area read the articles on RARE II. Photo by Phil Rhodes

## **Our Last National Forest Wilderness**

Today, 62 million acres of our national forests and national grasslands remain roadless and undevelopedsome 2,000 areas--in 38 states--every region of the country.

This is a remarkable remnant: called "de facto wilderness" (literally,

"wilderness in fact") or "roadless" because these areas have no formal protection. In striking contrast to the many millions of acres of national forest land which have already been developed or laid open to development, these lands remain wild in 1978 thanks to luck and their relatively low value for commodity development. Though not legally protected, these roadless areas offer invaluable wildlife habitat and

watershed protection--and

wilderness by millions of Americans.

Yet all of this "de facto" wilderness is endangered right now through the RARE II program!

THE RARE II PROGRAM RARE II began in 1977 with the identification of remaining roadless lands ("de facto" wilderness) on the 187 million acres of national forests and national grasslands. This inventory encompasses 62 million acres which remain roadless and undeveloped. RARE II will, by the end of 1978, allocate each of the 2,000 areas in this inventory to one of three categories: **WILDERNESS** 

These areas will be recommended by the Forest Service for protection under the 1964 Wilderness Act, but full legal protection will

of Congress. **NON-WILDERNESS** 

These areas will be officially declared "non-wilderness," and opened to incompatible uses such as logging, offroad vehicles, road-building, etc.

**FURTHER PLANNING** 

These areas will be considered further in the land use planning process before being allocated to either wilderness or to non-wilderness

As RARE II was originally described, the roadless areas would be sorted into these categories after full consideration of: 1) the availability of adequate and reliable data upon which to

This and several other RARE II articles are continued on pages 4, 5 and 8.

## **BLM** Improves Wilderness Inventory

On August 18 the Bureau of Land Management (BLM) issued its "Interim

California Desert Conservation Area Wilderness Inventory Map" which depicts BLM roadless areas in the California Desert which the agency feels contain 2(c) criteria of the Wilderness Act of 1964. From more than 275 roadless areas 125 were found to possess wild-

erness characteristics. Public comment on the map will be accepted until Sept.

This map is the second in a progression of four which will culminate in a final map in February 1979, to be used as a baseline by the BLM's Desert Planning Staff in their wilderness study. By

Sept. 30, 1980, the BLM expects to make its final recommendations to Con-

Conservationists with a knowledge of or interest in

specific roadless areas should obtain this interim map and comment upon areas with which they are familiar. Also available are narratives on each roadless area which are available individually upon request. Maps and specific narratives are available from the **BLM Wilderness Inventory** Team, Riverside District Office, 1695 Spruce St.,

Riverside, CA 92507. Despite intense pressure from Off-Road Vehicle groups and the mining in-

dustry, the Inventory Team

improved the quality of the map substaninterim tially over that of their first map. Many wilderness study areas missed earlier during the summer have been added. Some areas. however. were unexpectedly reduced in size and others remain to have their wilderness characteristics recognized by BLM.

Areas reduced in size include: Midway Mtns. (#355) which contains a very rich reptile fauna; parts of the Imperial Sand Dunes (#360) with many specialized and rare plants and animals; the Pinto Mtns. (#335) that is adiacent to existing Wilderness

cont. on pg. 7

## Presidents Message

by Bob Schneider

"It is a critical time for wilderness in California." You have heard this statement a hundred times, but it is truly applicable NOW. Recent activity at the front:

1. Snow Mountain Wilderness Hearing held in Williams on August 10, 1978, with strong wilderness support.

2. Mt. Shasta Wilderness Hearing held in Redding on August 19, 1978, again with solid pro-wilderness representation.

Ongoing U.S. Forest Service Roadless Area Review (RARE II). Send a letter for each of your favorite areas. Deadline is

Oct. 1.

4. Bureau of Land Management Desert Wilderness Review. The second B.L.M. Desert Roadless Area map was released on August 18, 1978. New meetings are scheduled by the B.L.M. to receive comments on the new map. You may also send in

comments, which will be accepted until Sept. 18. Additional information on

each of these items is contained in the Wilderness Record. The basic message is the same. Many critical issues affecting the future of California wildlands will be decided in the next six

Your participation will determine how much of California's wildlands are protected. Write those letters! They do make a difference. Get involved. Write or call the CWC office for more information if you need it. Join a local group or form one to protect your favorite areas.

Make no mistake--Those areas not protected will be logged, mined, developed, and run over by ORV's. So keep up the good work! Remember, we each need to write in the next couple of months all those letters of support that we would normally write in the next



Snow Mountain Roadless Area [#5144].

Photo by Jim Eaton

## **Snow Mountain**

In response to a Congressional mandate, the Mendocino National Forest has completed a wilderness study for the Snow Mountain area. Not surprisingly, the Forest Service is recommending only 19,000 acres of the 52,000 acre study area for wilderness.

#### The Snow Mountain Area

Snow Mountain is located in the coastal mountain ranges of Lake, Colusa, and Glenn Counties. Rugged in character and dominated by 7,056 foot Snow Mountain peak, the area provides a unique opportunity for a

wilderness experience within a few hours' drive of Sacramento and San Francisco. It is easily accessible during winter months when many other wild aras are blanketed with snow.

Although not heavily timbered, it is an area rich in native flora and fauna. The vegetation includes grasslands, mountain meadows, many chapparral types, canyon oaks, oak woodland, mixed conifers, and high elevation red and white fir. Snow Mountain also abounds with wildlife--deer, squirrel, bobcats, golden

eagles, quail, bear, and

mountain lion. The Middle

Fork of Stony Creek which flows through the area supports a fine native trout fishery.

Snow Mountain is considered by many to be an ecologic "island in the

sea." This area has been known for many years by botanists to be unique in harboring rare plants. The California Native Plant Society has identified nine known rare plants which occur there. Also of interest is the fact that a minimum of 65 plants reach their southernmost limit in the Coastal Range on Snow Mountain.

During the past forty-year

struggle for a Snow Mountain Wilderness the Forest Service has not been idle. Roads and logging have affected portions of the area, and the agency has encouraged trailbike use within the proposed wilderness. Two and four-wheel vehicle routes publicized by the Forest Service has created an off-road vehicle problem where none existed previously. Also, there is no enforcement of a vehicle closure for the core of the

### The Proposal

The Forest Service is currently proposing a 19,650 acre "mini-wilderness" that would allow ORVs to expand their use of the area. Only a slice of Snow Mountain would be preserved. This proposal also allows the Forest Service to get at the timber in the area--a whopping 686 acres of the 52,000 acre Study Area have timber in the Standard Component.

Environmentalists, led by the Snow Mountain Wilderness Area Committee, are recommending a 50,000 acre wilderness similiar to

the Forest Service's Alternative 1. This proposal will protect virtually all of the watershed of the Middle Fork of Stony Creek, and as much of Snow and St. John mountains as remains roadless today.

### Snow Mt. Hearing

On August 10, a public

hearing was held in Williams, CA to provide citizen input on the Forest Service's Snow Mountain Wilderness proposal. California Wilderness Coalition spoke in favor of the Snow Mountain Wilderness Area Committee's proposal of a 50,000 acre wilderness, and opposed the official Forest Service proposal of only 19,650 acres. At the hearing, testimony was overwhelmingly in favor of a larger wilderness. Many local citizens from Glenn, Lake and Colusa Counties spoke of their frequent and long-standing use of the area for horseback riding, hunting and hiking, and its valuable biological resources, such as golden eagles. falcons, mountain lions, and rare plant species. The participants also stressed the area's proximity to wilderness-starved

populations in the Bay Area and Sacramento, and its

accessibility during fall and winter. Others pointed out the great natural beauty of the Snow Mountain area, and the excellent opportunities for solitude and escape offered by the rugged topography of St. John Mountain, ommitted in the Forest Service Proposal. Even a forklift driver from Chico and a building contractor from Davis attended and expressed their concern for the preservation of the entire study area. Only a single speaker was opposed to a larger wilderness designation. It remains to be seen how the Forest Service will utilize these comments in developing their final proposal for a Snow Mountain Wilderness.

Written comments on the wilderness proposals will be accepted until September 11th. Copies of the study may be obtained from, and letters sent to: James L. Davis, Jr., Forest Supervisor, Mendocino National Forest, 420 E. Laurel St., Willows, CA 95988.

Snow Mountain also is being considered in the RARE II process. Letters supporting wilderness for the entire Snow Mountain roadless area #5144 may be sent by October 1 to: Regional Forester, U.S. Forest Service, 630 Sansome St., San Francisco, CA

pect of this recent setback is

that a new Forest Service

Since conservationists have

apparently destroyed earlier

Service is now claiming that

the appeal is "untimely"

since they made up their

minds to expand the ski

area years ago. This argu-

Chief, was never brought

forth for rebuttal by con-

The appellants are con-

ment, accepted by the

servationists.

defense has emerged.

arguments, the Forest

## **CWC Sponsored Businesses**

Like any political organization, California Wilderness Coalition depends on sponsorship and support. The organization is grateful to the following businesses that have been able to see beyond just selling their products to the great need preserve the wildern in which their products are

The Smilie Company 575 Howard St. San Francisco, Ca. 94105 415-421-2459

Echo, The Wilderness Company 6505 Telegraph Ave. Oakland, CA 94609 (415) 658-5075

Wilderness Press 2440 Bancroft Way Berkeley, CA 94704 (415) 843-8080

Mammoth Maintenance Service P.O. Box 155 Mammoth Lakes, CA 93546 (714) 934-8616 (Greg Newbrv)

Antelope Camping Equipment Mfg. Co. 21740 Granada Ave. Cupertino, Ca. 95014 408-253-1913

Solano Ski Sport 1215 Tabor Ave. Fairfield, Ca. 94533 707-422-1705

**New World Outfitters** 1055 Market St. San Francisco, Ca. 94103

Alpine Products, Inc. P.O.Box 403 West Sacramento, Ca. 916-372-2861

The Alpine Supply Co. 130 G Street Davis, Ca. 95616 916-756-2241

The Mountain Shop, Inc. 228 Grant Ave. San Francisco, Ca. 94108 415-362-8477

Four Seasons Sports 410 Redwood Oakland, CA 94619

## Sierra Ski Ranch Appeal Rejected

Chief John McGuire has ruled in favor of the Forest Service in an appeal of their plans to expand the Sierra Ski Ranch into a portion of the proposed Upper Truckee wilderness. Conservationists argued that the expansion plan was in violation of the RARE II program and the National En-

vironmental Policy Act. The area of contention lies south of Highway 50 near Echo Summit in the proposed Upper Truckee Wilderness. The Forest Service refers to the area as Dardanelles (#5982) and Caples Creek (#5027) and admits er than dismembered that the area to be affected piecemeal.

by the ski area expansion is

roadless and undeveloped. They then left the area out of the inventoried roadless area and proceeded with development plans, in violation of the RARE II procedures.

The Forest Service plan was appealed by Sari J. Sommarstrom, California Wilderness Coalition, and The Wilderness Society. Although previously turned down by the Regional Forester, the appellants had hoped Chief McGuire would rule to have the entire roadless area considered for wilderness rath-

The most interesting as-

sidering now further means of having the Forest Service comply with the law and their own regulations in this

## Mount Shasta

After four years of delay, the Forest Service officially released its draft Wilderness Proposal and Environmental Statement for Mount Shasta on June 29, 1978. The agency's proposed 24,760 acre wilderness excludes a critical Shasta red fir forest coveted by developers for a downhill ski resort. Conservationists who want more than just the rock and ice on Mt. Shasta are proposing a 41,000 acre wilderness.

#### The Mt. Shasta Area

Located near the southern end of the Cascade Mountains in Northern California, Mt. Shasta (14,162 feet) is the second highest mountain in this volcanic chain. It is a dominant, aweinspiring feature and can be seen from many locations in Southern Oregon and Northern California.

There are five glaciers, three major waterfalls, and numerous lava flows within the proposed Wilderness. Other geologic features include Shastina, the Red Banks, and Thumb Rock. Endangered, rare, or unique species include the pine martin, fisher, Shasta salamander, and the pileated woodpecker. Five species of plants classed as "sensitive" have been or may be located within the proposed Wilderness.

Hiking or climbing Mt. Shasta is the primary recreation activity in the area. Other uses include camping and cross-country skiing.

In many respects Mount Shasta is an island; topographically, geologically, and botanically, like the Point Reyes Peninsula. Here we have a very wide range of life zones and geologic wonders. Even the most liberal wilderness can only protect about onefourth of Mount Shasta. Most of the remainder of the mountain is relatively unspoiled, though the mesh of roads becomes finer every year, and the scars of logging and plantation clearing become more and more prominent.

The Forest Service has been reluctant to do any thing to protect Mount Shasta, not only because of the development interests, but because about 40% of Mount Shasta is privately owned. Though we should keep working within the Forest Service planning framework, we must realize that the only solution for Mount Shasta is National Park status. A National Park would allow for purchase of the private lands, for creation of a Wilderness Area, and damaged superlative areas to return to, their natural condition, for tasteful recreation development (campgrounds, picnic areas) on the lower slopes. Only this way can we save all of this magnificent mountain, from base to summit.

#### The Forest Service Proposal

The Forest Service proposes that 24,760 acres of Mount Shasta be designated "Wilderness" by Congress. This proposal is one of seven alternatives for management of the upper slopes of Mount Shasta listed in the Draft Environmental Statement. Five of the alternatives include Wilderness proposals of varying size.

Despite some earlier indications that the Forest Service might begin to develop an enlightened attitude toward Mount Shasta, the Forest Service has completely caved in to Ski Shasta Corporation and the timber industry in coming up with their proposal.

The Forest Service proposal was carved out of a revised Wilderness Study Area of 39,030 acres. To create the plan, eleven exclusions totaling 14,370 acres were made, and four additions, including Horse Camp, totaling 100 acres, were added. The exclusions were made to satisfy ski and timber interest, as mentioned earlier, but other weak excuses were given. These would include proximity to logged lands outside the Wilderness Study Area, views of towns and logged areas, difficulty in mapping if the area were included versus the ease in mapping if it were not, private inholdings, presence (in a few cases) of old selective timber cuts and no longer passable roads.

The proximity of developments excuse is particularly absurd, since once the exclusions are formalized and the Wilderness boundaries set, development will occur in the exclusions up to the Wilderness boundary. In exclusion one (section 30), survey tapes for one of the chairlifts of the proposed new ski area extend right up to the WP boundary.

It should also be noted that the Forest Service made most of its exclusion determinations from the study of maps, aerial photos, and survey flights. An in-depth ground study of the boundary areas appears to have begun only this June with the hiring of a Wilderness Ranger by the Mount Shasta Ranger District.

Unfortunately, part of exclusion five (northeast side) is justified due to recent logging sales by Southern Pacific Land Company, affecting parts of their sections 1 and 25.

The last-minute 'exclusion of 300 acres of section 30 (exclusion one), came as a direct result of lobbying efforts of Congressman Harold T. (Biz) Johnson,

plus paid Ski Shasta lobbyists Bob Roberts (Director, Sierra Ski Areas Association), and Paul Statham, former National Forest Supervisor.

Although only 300 acres in section 30 are directly involved, the loss of this area would have widespread

ramifications. A chairlift would terminate one-

quarter mile from Horse Camp, a popular base camp for the Mount Shasta ascent. The opening of section 30 is the key to the ski development of sections 31 and 36, including Sand Flat and the remainder of the largest remaining stand of Shasta red fir on Mount Shasta. The Forest Service states it this way: "Because of this area's suitability for downhill skiing and its relationship with areas in sections 25 (already logged), 31 and 36 which are outside the Wilderness study area and also have potential for

downhill ski development, it is not recommended for Wilderness." (Draft Wilderness Proposal, page 27.)

#### **ADDITIONAL POINTS**

The Forest Service made a couple of particularly callous decisions in drawing the lines of their proposal. They drew the line right through the center of Lower Squaw Valley Meadow, the only lakebed meadow on Mount Shasta. And they drew the line through the summit of the main North Gate lava dome, leaving out the Shasta red fir forested north slope.

### Poster Available

Mt. Shasta wilderness posters are now available. These outstanding 2x3 foot 4-color posters designed by the untiring Walker Brothers call for the preservation of Mt. Shasta.

Posters may be obtained from the Mt. Shasta Resources Council, P.O. Box 829, Mount Shasta, CA. 96067. Send \$3 for a poster plus 75 cents for handling.

#### The Citizen's Proposal

Conservationists are supporting a 41,000 acre wilderness as proposed by the Mount Shasta Resource Council. This plan would encompass the Forest Service rock-and-ice proposal as well as the lower forested slopes. The Shasta red fir stands still uncut would be protected, and some lands already logged and roaded would be allowed to recov-

Skiers for Quality Skiing (SQS), a local group of downhill skiers, is proposing an alternate site for downhill ski development that would not greatly affect the 41,000 acre wilderness proposal. The SQS plan would take in lower slopes already logged in the Gray Buttes area was well as

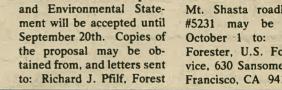
some of the existing ski facilities. The Ski Shasta

Singer 1.

Corporation, however, seems adament on expanding into the wilderness of section 30.

Written comments on the draft Wilderness Proposal Supervisor, Shasta-Trinity National Forest, 2400 Washington Avenue, Redding, CA 96001.

Mount Shasta also is being considered in the RARE II process. Letters supporting wilderness for the entire Mt. Shasta roadless area #5231 may be sent by October 1 to: Regional Forester, U.S. Forest Service, 630 Sansome St., San Francisco, CA 94111



## Mt. Shasta Hearing

Wilderness supporters from throughout California attended the U.S. Forest Service hearing in Redding on August 19, 1978, on the proposed Mt. Shasta wilderness. The Forest Service proposes a "rock and ice" wilderness of about 24,000 acres. Wilderness enthusiasts argue for, a .41,000 acre area with an additional 20,000 acre Natural Wilderness Resource Recovery

A major area of controversy involves the future of skiing on Mt. Shasta. Save Our Skiing (S.O.S.), representing merchants, local Chambers of Commerce, and Carl Mc Connell (the current Ski Shasta owner), argued for relocation of the existing ski area into Sections 25 and 30. Section 30,

however, contains the best

Area.

remaining stands of the virgin Shasta Red Fir climax forest.

Skiers for Quality Skiing (S.Q.S.), a local skiers organization, argued for expansion of the existing ski area into the Grey Butte area. This proposal is an excellent compromise endorsed by the Mt. Shasta Resources Council. It protects the Shasta Red Fir and allows skiing on the moun-

tain to continue. Other local groups testified for a large wilderness--in cluding Friends of the Mountain and the Sand Flat Appeal Group.

The U.S. Forest Service proposal callously disregards the Wilderness concept and local, state, and national public opinion which favors thorough evaluation of wilderness opMany have argued that the

Mt. Shasta area should be made a National Park. As John Amodio, the Sierra Club Northern California Wilderness Coordinator stated: "Mt. Shasta wilder-

ness will be protected

through the Forest Service by the Forest Service, or it will be protected from the Forest Service" All those interested in Mt. Shasta should write: Forest Supervisor Shasta-Trinity National Forest U.S. Forest Service 2400 Washington Ave. Redding, CA 96001 Urge that the Mt. Shasta

Resources Council wilderness proposal be adopted and ask to have your letter entered into the official hearing record. Deadline--September 18,



East side of Mount Shasta [#5231]: Ash Creek Canyon and Falls. .

### Last Wilderness

### cont. from page 1

base any decision; 2) the presence of some kind of consensus in public opinion favoring wilderness of development; and 3) assessment of the "tradeoffs" between preservation and development. Areas for which sound data is lacking, or where controversy still divides public opinion, would be left in the "further planning" category for the detailed evaluation traditionally given through individual wilderness studies.

### THE ANTI-WILDERNESS ATTACK

As origianlly described, RARE II aroused a storm of protest from timber, mining, and off-road vehicle interests who disrupted Forest Service meetings in with cries of "no more wilderness." These special interest played upon and intensified anti-wilderness fears in some communities, and they put steady pressure on the Forest Service to alter the RARE II ground-rules. Their themes:

Settle everything now.
No "further planning"
for wilderness. Do it fast.

Their pressure tactics worked. The rules were altered. The deadline (December 1978) for final Forest Service recommendations was locked in, regardless of the quality of the job that might be done. Public commitments were issued, long before the analysis was done, that there would be little "further planning."

At that point, the RARE II program itself became a threat to wilderness. By forcing all remaining roadless areas into the quick decision making program, RARE II made it easy for Forest Service officials to lose sight of the individual character of these lands and to underrate their wilderness values. Lumping so many areas together makes it difficult for concerned citizens to ensure that each deserving area receives adequate attention and sup-

The anti-wilderness interests see this RARE-II program as their chance to remove most or all of these 62 million acres of wildlands

from wilderness consideration quickly--and permanently. They think they have conservationists on the run and that few will rally to speak up for this last remnant of national forest.

They are working hard to turn out anit-wilderness letters and to sway the Forest Service, governors,

senators, and representatives to their way of thinking.

If any of this wilderness is to live--its wildlife, its solitude, its quiet beauty, its ecological wholeness--you must help by raising your voice for wilderness now.

WHERE DO WE STAND

NOW?

In June, the Forest Service issued its analysis of the roadless areas which had been inventoried: a draft environmental impact

statement (DEIS) consisting of a nationwide summary document and individual state or regional supplements. Both can be obtained from Regional Forester, 630 Sansome St., San Francisco, CA 94111, where comments should

should also be addressed.

The DEIS presented 10 alternative listings of the roadless areas sorted into

roadless areas sorted into wilderness, non-wilderness, and further planning categories. Each alternative sorts all the roadless areas, using different decision-making criteria.

Arrayed in a comparative chart, the "range" of alternatives for California looks like this-- (see below)

## Obviously, this array of alternatives is not balanced.

The extreme options, all wilderness ("J"), all non-wilderness ("B"), no action ("A"), were included simply to meet legal requirements. The seven "practical" alternatives yield strongly anti-wilderness lists.

An ominous indication of

current thinking within the Forest Service is Alternative "H", in which agency officials judged areas based on their perceptions of local and regional opinions and needs. Since there is little to choose from in this lopsided array, we will have to show public support for all deserving areas and we will have to demand the use of more

balanced criteria in reaching the final decisions.

#### THE FOREST SERVICE ANALYSIS OF WILDERNESS

The badly slanted set of alternatives was accompanied by a one-sided analysis of economic "tradeoffs," attempting to show what it would "cost" to preserve this "de facto" wilderness.

The so-called analysis calculated "costs" of preserving wilderness on the basis or potential lost development but neglected to consider that such development would cost millions of dollars in taxpayer's subsidies. And beyond this oversight, the benefits of wilderness preservation to all Americas were ignored.

This failure to make a balanced economic appraisal will condemn many deserving roadless areas to needless destruction through public subsidy

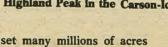
through public subsidy when in many cases, federal funds could be **saved** by wilderness preservation.

## HOW RARE II DECISIONS WILL BE MADE--UNLESS YOU SPEAK OUT

The Forest Service proposes six major "criteria" to be used in sorting out the roadless areas for the final decision in December. A crucial issue is how much weight to give each criterion-and public comments on them can help-
1. PUBLIC "CONSEN-

1. PUBLIC "CONSENSUS". This should be the principal criterion. RARE II should not force decisions on areas which require more careful study and public review. Urge that a very strong showing of public opinion be required before any area is dropped from wilderness consideration.

2. RPA GOALS. Under the Resources Planning Act (RPA), an earlier law, the Ford Administration set certain goals for the national forests. Included was a low goal for wilderness preservation. Anti-wilderness forces demand that this unacceptable old goal be retained, serving as a ceiling on the amount of wilderness recommended by RARE II. Forest Service data demonstrates that the wilderness goal could be



commodity production.

Urge that the inadequate RPA wilderness goal be dropped altogether as a decision criterion.

higher without any adverse

impact on timber or other

3. LOCAL COMMUNITY IMPACTS AND NATIONAL GOALS FOR ENERGY, HOUSING AND

INFLATION. The data in RARE II is too primitive and one-sided to justify conclusions on any of these subjects. Unless an area can be proven unequivocally to meet existing national or local needs for commodity production, it should not be allocated to the "non-wild-erness" category.

4. ROUNDING-OUT THE WILDERNESS SYSTEM

Using simple information on ecosystems, landforms, wilderness wildlife species, and geographic distribution the Forest Service has set some arbitrarily low targets for "rounding-out" the National Wilderness Preservation System through RARE II. Urge that these targets be substantially increased. Demand also that there be no arbitrary ceiling on such representation.

5. WILDERNESS QUALITY

The Forest Service used a controversial and uneven "Wilderness Attributes Rating System to judge the "quality" of the areas. In many DEIS alternatives, areas with anything but a high "attributes" score were automatically dismissed, despite existing support from the public given them for a wilderness recommendation. The scores are highly subjective and were assigned to each area

by local Forest Service officials according to their own biases. Urge that "wilderness attribute" scores should not carry greater weight than public opinion expressed about roadless areas.

Photo by Jim Eaton

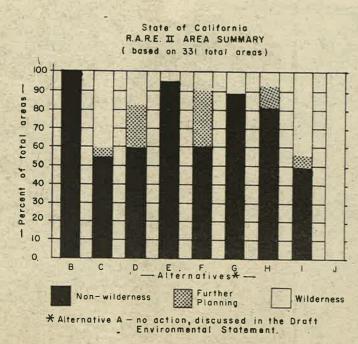
6. NATIONAL GRASSLAND WILDERNESS

The Forest Service proposes no RARE II wilderness recommendations on our national grasslands unless there is absolutley no other area which meets a particular landform or ecosystem quota (see criterion 4). This discriminates against 19 tiny areas which make up all of our prairie wilderness potential in RARE II. Urge that unfair restrictions for wilderness on our publicly-owned

grasslands be scrapped.



Highland Peak in the Carson-Iceberg Roadless Area [#4986].



Minarets Wilderness in the background; San Joaquin Roadless Area [#5047] in the foreground. Photo by Jim Eaton

graphic by Mike Nolasco

# How The RARE II Decision Should Be Made--

The Forest Service must hear strong public protest of the anti-wilderness theme of RARE II, which is to settle the fate of all roadless areas, once and for all, right now. Why this rush to judgement on so critical an We should keep issue? options open for future generations. A premium must be put on protecting a maximum amount of wilderness. The loss of this "de facto wilderness" to reckless development will diminish our natural heritage and deny choice to future generations.

Here are some criteria for the RARE II decision which you should urge the Forest Service to adopt. They will be considered only if there is strong demand for them.

A. COMMODITY NEED. In most cases the resources in roadless areas are not required to meet national and local needs or, like water and grazing land, would be available even if formal wilderness protection were granted. Urge the Forest Service not to declare, an area "non-wilderness" unless there is a commodity need that cannot be met from developed lands.

B. HONORING EARLIER COMMITMENTS. In 1973,

during the first RARE program, the Chief of the Forest Service promised formal individual "wilderness studies" of 274 roadless areas covering 12 million acres. Only a handful of these have received the promised study. All are "up for grabs" in RARE II. Urge the Forest Service to honor this earlier commitment by recommending all such areas for wilderness or at least "further planning".

C. COST EFFECTIVE FEDERAL INVESTMENT. Often the federal funds that would be used to develop and build roads in roadless areas would produce more if invested in intensive management of commodities

such as timber on non-roadless lands. Urge the Forest Service not to declare an area "non-wilderness" unless its development can be shown to be cost-effective. D. BOUNDARY ADJUST-

MENTS. Often the conflicts over a proposed wilderness are rsolved by making alterations in the boundaries. The RARE II DEIS contains little or no information on such admustments. Ask that no area be allocated to "non-wilderness" until the public has had the chance to review maps showing pro-

posed adjustments.

E. THE EAST AND THE GRASSLANDS. The roadless areas in these regions are few and small. Almost every one can be preserved with no serious adverse impacts. All should be.

#### HOW YOU CAN HELP

1. WRITE A PERSONAL LETTER

Here is How to Make it Count! The Deadline is October 1.

Even a short letter will help, but the more you can say the better.

A. If you can, be specific about individual areas or groups of areas. Name the areas and give reasons why you want them preserved. This area-specific approach will carry the most weight. You need not have been to an area to speak up for it; indeed, your future opportunity to visit, or simply wanting to know it remains wild, are major reasons for preserving wilderness.

Leave the advocacy of areas for "non-wilderness" to the opponents of wilderness. If you are not able to comment on specific areas, write a general letter commenting on these other points.

B. Express support for the

"Conservation Groups Proposal" for your state or nationwide. In most RARE II states, conservation

groups such as the Sierra Club and The Wilderness Society are submitting their own recommendations for specific areas urging preservation for all worthy wildlands. Your support for such citizen initiatives in your region and across the country in opposition to the unacceptable alternatives prepared by the Forest Service, can help save deserving areas.

C. Comment on the way RARE II is being handled. This article gives you an overview of the problems. Express your views on the unrealistic time-table, the rush to settle all areas, the slanted alternatives, and the one-sided economic analysis.

D. Comment on the"decision Criteria." The weight given to each of the criteria will make a great difference. State clearly which you think should count the most and which should be discarded. It is especially important to stress that only a strong consensus of public opinion should allow any roadless area to be allocated to non-wilderness. Urge

also that the 1975 Resource Planning Act (RPA) wilderness goal be scrapped, and that more examples of ecosystems, landforms, and wildlife be included in wilderness. Request the Forest Service to adopt the additional missing criteria we have suggested. Take the

SEND YOUR LETTER AS SOON AS POSSIBLE.

time to list and comment on

For California the address is Regional Forester, 630 Sansome St., San Francisco, CA 94111.

The deadline is October 1, but letters received well before then will receive more attention.

2. IF YOU CAN, MAKE COPIES OF YOUR LETTER

Send copies, with a brief covering note in support of wilderness to: (1) your two senators (U.S. Senate,

Washington, D.C. 20510);
(2) your representative (House of Representatives, Washington; D.C. 20515,);
(3) your governor at the State Capitol; and (4) President Jimmy Carter, The White House, Washington, D.C. 20500. These copies are helpful in building essential political support for wilderness.

group.

WHAT HAPPENS NEXT?

After the October 1st

ifornia Wilderness Coalition, the Wilderness Society or your local wilderness

3. GET INVOLVED.

More volunteer help is urgently needed. For information contact the Cal-

deadline, the Forest Service will analyze the public comments and begin shaping a final RAREII recommendation. In November and December, that recommendation will be under review in the White House. The results are expected to be sent to Congress in January, and to lead to a year of unprecedented political ac-

#### AN URGENT MESSAGE:

tion for wilderness in 1979!

We are asking every conservationist to write a letter for wilderness...and we are asking you to give that letter unusual effort immediately. As a conservationist,

you've probably written on behalf of wilderness before. But no letter (except those you've been writing this year for Alaska) will be more important for wilderness than this one. Farreaching decisions regarding 62 million acres of National Forest roadless land are being made right now, in a single hurried program.

This is why we ask for an unusual effort, a longer letter, and your immediate attention to RARE II!

## How to Write An Effective RARE II Letter

The Forest Service is looking for specific criteria in letters they receive on RARE II areas, and the more criteria covered in your letter, the more impact your letter will have. These decision criteria are listed below. Each will be given a

computer point in the Forest Service final evaluation of which areas should become wilderness, which should be developed, and which should be studied further.

The important points to cover in your letter are: (1) State that the roadless area

should be recommended for wilderness status. (2) The area represents a landform or natural ecosystem that would add diversity and quality to the Wilderness System. (A list of areas which contain relatively unrepresented ecosystem

types in Californias is given in the accompanying table) (3) The area provides habitat for wilderness associated wildlife and/or threatened and endangered

species. (4) The area is accessible to the American people, such as being close

to population centers. (5) The area would make a high quality wilderness--it has good wilderness characteristics, such as wildness and opportunity for solitude. (6)

State that the 1975 Resource Planning Act (RPA) wilderness goals of 25-30 million acres of national forest wilderness are arbitrary and too low. These goals should be minimums, not maximums. Actually, over 41 million acres of the 62 million acres of roadless areas in RARE II could be designated wilderness

without any adverse effect on the timber cut. But if these goals are followed, the maximum additions from RARE II could total only 10.3 million acres! (7) State if an area lacks significant timber that could be harvested, has low potential for mineral and energy resource development, or if the Forest Service has exaggerated these resources.

It is very important to include the above criteria and reasons in wilderness supportive letters to the Forest Service. Your comments must be postmarked by October 1, 1978. More details are available in the July-August 1978 Wilderness Record.

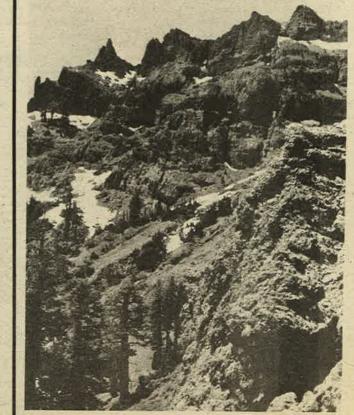
## Ecosystem types which are presently underrepresented in the National Wilderness Preservation System in California

Area #	Area Name
	A SPACE OF STREET OF STREET
5002	Sespe-Frazier
5010	
5010 5013	Ladd
5015	Trabuco-Hotsprings San Mateo
5033	Coyote-Southeast
5077	Orleans Mt.
5079	Snoozer
5087	Devil's Garden
5089	Lost Creek
5090	Cinder Butte
5098	Ishi
5117	La Brea
5134	Sawmill-Badlands
5145 5151	Big Butte-Shinbone
5166	Burnt Lava Flow
5171	Big Canyon Adams Peak
5178	Deep Canyon
5180	Granite Peak
5197	Oat Mt.
5198	Kings River
5218	Bell-Quimby
5222	Cow Creek
5227	East Girard
5231	Mt. Shasta
5248	Monkey
5258	Tuolumne River
5268 5299	Quatal
5307	Fisher Gulch
5701	Sheep Mountain Siskiyou
5703	Kangaroo
5707	North Fork Smith
1	TOTAL TOTA OHIGH

### Ecosystem/Plant Community

Mixed Coniferous Forest

Juniper-Pinyon Woodland California Oakwoods California Steppe (grassland) California Steppe California Steppe Alpine Meadows CA Mixed Evergreen Forest CA Mixed Evergreen Forest Western Ponderosa Forest Western Ponderosa Forest Western Ponderosa Forest Sierra Chaparral California Oakwoods California Oakwoods Juniper-Pinyon Woodland CA Mixed Evergreen Forest Western Ponderosa Forest Western Ponderosa Forest Western Ponderosa Forest Juniper-Pinyon Woodland Juniper-Pinyon Woodland California Oakwoods Sierra Chaparral Pacific Mixed Coniferous Forest **CA Mixed Evergreen Forest** CA Mixed Evergreen Forest Chaparral Pacific Mixed Coniferous California Oakwoods Juniper-Pinyon Woodland CA Mixed Evergreen Forest Mixed Coniferous Forest CA Mixed Evergreen Forest Pacific Mixed Coniferous Forest Paicfic Mixed Coniferous Forest



Reynolds Peak in the Raymond Peak Roadless Area [#4985]

## Mining Threatens Pacific Crest Trail

Forest Service public involvement efforts took a giant step backward recently when Tahoe National Forest officials attempted to approve the Four Hills mining proposal in the East Yuba Roadless Area (#5264). The Forest Service gave the public only 12 days to comment on the sparsely distributed Environmental Analysis Report (EAR).

The proposal projects an operation of 4 five ton trucks and a portable ore crusher on the segments of the Pacific Crest Trail adjacent to the East Yuba Area. Although this proposal has been in the workings for over a year, public comment from the hikers who use the area was not sought. Until the draft EAR was released

This article is the

first in a series concerning wilderness and

resource conflicts.

Future articles will
feature grazing,
geothermal, and

in February, local private property owners and the nearby Contra Costa Youth Association camp did not know about the plan. The proposal claims the mining plan "to be neither highly controversial nor considered to be a major federal action significantly affecting the quality of the human environment."

By keeping the initial analysis quiet, the real impacts--development of a RARE II area, disruption of the Pacific Crest Trail and interrupted access to the youth camp were minimized in hopes that a full fledged Impact Statement would not be needed. Although shipping of 3000 tons of ore to Japan for analysis now seems unfeasible, the clai-

mants still maintain the mining would produce a favorable impact on the U.S. balance of trade. Even Forest Service minerals for personnel have been unable to substantiate the claimants findings.

State Senator John Nej-

edly has been able to delay the project, and like others, presently awaits a revised EAR. Comments should be sent to Robert Lancaster, Supervisor; Tahoe Nat'l Forest, Nevada City, CA. 95959. Support East Yuba Roadless area (#5264) and ask to be informed. Oppose mining The Four Hills area since mineral resource appears highly speculative and the recreational value far more important.



Siskiyou Mountains: Crescent City Fork Blue Creek in the uninventoried Blue Creek
Roadless Area.
Photo by John Hart

## Citizen's Handbook

## Wilderness and Mining

#### THE HIDDEN THREAT

Unlike logging, off-road vehicle use, and ski development, mining can occur on any acre of public land no matter what the original land allocation unless that area is specifically withdrawn from mineral entry. Even in designated wilderness areas, mining is a threat because politically expedient loopholes in the Wilderness Act of 1964 allowed the development of valid mineral claims and the patenting of claims until December 31, 1983. Current considerations for Forest Service and Bureau of Land Management (BLM) are particularly vulnerable to mining since "significant exploration", if not smallscale development, can be used to deny an area wild erness designation.

A basic understanding of pertinent mining laws and regulations can help citizen activists counter potential threats.

#### TYPES OF MINING

1. DEEP MINING: Does not entail the removal of large areas of soil and the underlying bedrock. Includes vertical shafts and tunnels used to follow the veins of ore.

2. SURFACE MINING: The type that has much greater impact on the environment since mineral deposits sought by this type either run parallel to the surface at shallow depths over a large area, or are concentrated and begin at or near the surface. Strip mining removes the "overburden", or layer of soil and rock between the surface and the ore deposit, and then blasts and shovels away the ore. Placer mining uses large quantities of water to flush away soil and gravel, leaving heavier mi-

nerals. Open pit mining entails excavating a large pit with concentric circles of roads to remove the ore as it is exposed.

## TYPES OF MINERALS and LAWS THAT AFFECT

1. HARD ROCK: includes copper, molybdenum, gold, lead and uranium; governed by the mineral law, the Mining Law of 1872. This law gives individuals and corporations the right to claim mineral rights to and eventually purchase for \$2.50 to \$5.00 per acre any public land which is not specifically withdrawn from mineral entry. The claimant need only record the claim with the county courthouse and the BLM, make minimal improvements on the claim site, and either proceed to develop the claim or speculate and wait to be bought out by a large cor-

2. SOFT ROCK: Includes oil, coal, natural gas, oil shale, and phosphates, which are leased to the public rather than given away virtually for free. The Mineral Lands Leasing Act of 1920 is the basic legislation for mineral leasing, and is supplemented by the Mineral Leasing Act for Acquired Lands of 1947. With the consent of the Department of Agriculture when National Forests are involved, the BLM issues the lease permit in cooperation with the US Geological Survey (USGS), the latter of which is charged with monitoring the mining activity.

3. COMMON SUBSTANCES: Materials such as sand, gravel, pumice, or common stone are made available to the public under terms of the Materials Sales Act of 1947, and are generally for localized roadbuilding and other construction needs.

#### WITHDRAWALS

The Secretary of Interior may order that any tract of public land be withdrawn from mineral entry and thereby prevent any new claims being made upon that area. The Federal Land Policy and Management Act of 1976 mandates that there shall be automatic periodic reviews of all such administrative withdrawals by the Secretary of Interior and the Congress.

## HOW TO INVESTIGATE MINING POTENTIALS

It is important, first, to find out as much as possible about the kinds of minerals present, the location of those minerals in the area, their potential for development, and the demand for those minerals. Most of this information is not readily available, and will have to be derived from several different sources.

The first source is the managing agency which may have reports or internal memoranda or correspondence concerning the area's mineralization. Very generalized information is usually present in planning documents, such as the RARE II materials, which should be based on support data from the agency's files. Persistence is vital in dredging up information from these files.

Other agencies, such as the BLM, the USGS, and the Bureau of Mines should also be contacted for relevant reports and information. USGS mining reports are available for those areas which have been studied for mining potential in the past. Many of these date back to World War II due to the increased need

for nearly all minerals, and

thereby did not have the

benefit of modern geolog-

ical exploratory techniques.

They can however, be a

measure of how much interest there was in an area in the past.

Another clue as to the mining industry's interest in an area can be seen by the number of claims which have been made in an area. A record of all claims is kept by each county showing the date, location, and claimant. It is important to check this list of claims with that of the BLM since, by October 1979, all claims on public lands must be registered with the BLM in order to remain valid.

When an area is threatened with mining, it is important that the "need" for those minerals be established to show them more important than the area's wilderness values. After it is ascertained which minerals are present in an area, the national supply and demand for those deposits should be determined by contacting the USGS and the Bureau of Mines.

A final tool in determining an area's mineral potential is to get professional assistance. It is difficult, but not always impossible, to get this help for free. Independent mining consultants are sometimes sympathetic to wilderness, and should be found if possible.

If an area threatened with mining is of high recreational value, it is possible to interest the State Division of Mines and Geology in examining the area's mineral potential. This is best accomplished by asking a local, county, or state official to make the request. It is also advisable to contact Universities for assistance from faculty or graduate students. Doing an independent mineral evaluation of an area could easily form the basis of a thesis or field research project.

## logging.

## Mammoth -Mono Planning Unit

The Inyo National Forest has released a Draft Environmental Statement for Land Management alternatives for the Mammoth-Mono Planning Unit (MMPU). The unit, encompassing much of Mono County contains portions of three existing wilderness areas and 16 roadless areas. Deadline for comment is

Sept. 14.
The MMPU contains
140,480 acres of the Hoover,
Minarets, and John Muir
Wilderness Areas. An additional 121,705 acres in 16
areas include proposed additions to the three existing
wilderness areas as well as
the Mono Craters, Watterson, and Glass Mountain

The detailed plan circumvents the RARE II process by assuming that none of the roadless areas will be selected for wilderness; if any areas are chosen, the RARE II decision will take precedence over the unit plan. This procedure, however, ignores wilderness values of the 16 areas in determining possible alternative uses.

The very existence of this Draft Environmental Statement was discovered by accident when representatives of the California Wilderness Coalition and The Wilderness Society met with Forest Service last month. Copies of the plan are in short supply.

Interested citizens may write the Inyo National Forest at 873 N. Main, Bishop, CA 93514.



Granite Chief Roadless Area [#5261]. \*\*\*\*\*\*\*\*\*\*

Photo by Jeff Barnickol

### **Editorial**

## Sierra Ski Ranch

Wilderness be damned! This seems to be the attitude of the California Region of the U.S. Forest Service. In turning down the appeal of conservationists to stop the expansion of the Sierra Ski Ranch into the proposed Upper Truckee wilderness, Forest Service officials have used every nefarious trick imaginable to justify their position. They have ignored the National Environmental Policy Act, RARE II, their own administrative policies, good land management

Of course, anyone familiar with the Forest Service's position on wilderness in California during the past

practices, and public trust

in clinging to their original,

illegal decision.

few years will not be surprised by the Sierra Ski Ranch decision. It is typical of Region Five's arrogance towards our Nation's laws and regulations. It has resulted in a long history of successful appeals and lawsuits by conservationists striving for good forest management.

The maneuvering of the Forest Service in turning down the appeal is fascinating. After conservationists shot down all of their arguments justifying their position, they invented a new one on which to reject our case. The Forest Service now says that since they made their minds up years ago to expand the ski resort they do not have to comply with laws and regulations since then. though the land is still wild they say our appeal is now untimely.

It is clear that the Forest Service has no intention of considering the merits of this case. Their only intention is to scheme and search for loopholes and Catch-22 situations that can be construed to support their tenuous position. Our conclusion is that the Forest Service believes that conservationists wiff abandon a few hundred acres of wild land since they have saddled us with 6.2 million RARE II acres.

They are in for a surprise.

Regional Representative The Wilderness Society

## South Fork Kern Project

The National Audubon Society and other interested organizations and individuals have begun working to preserve the unique qualities of the South Fork Kern River watershed and adjoining land. Their objective is to protect and preserve the entire 630,000 acre watershed of the South Fork in Tulare and Kern Counties, and the 150,000-200,000 acre Bureau of Land Management lands immediately to the east, most of this with high wilderness potential.

The South Fork Kern River begins its course at the 9,600 foot level in the new Golden Trout Wilderness. After 15-20 miles it enters the RARE II South Sierra Roadless Area where it continues its run for about 30 miles. By now the South Fork has dropped 2,600' to the 7,000' level where it enters the Woodpecker Roadless Area. After 15 miles through Woodpecker the South Fork enters the Domeland Wilderness at 5,400' and proceeds for 15 miles, exiting at 2,800'. For

the next 10 miles the river courses through the South Fork Valley entering Lake Isabella at the 2,600' level. During its journey the

South Fork has passed through the southernmost range of Bighorn Sheep, Golden Trout, and Foxtail Pine. It has coursed

through huge meadows, up to 4 miles long, passed magnificent pinyon pine forests, and through the finest cottonwood-willow riparian forest in the state. 30 miles of this river are currently protected.

Wilderness designation is being supported for all roadless areas: Sierra (#5029), Woodpecker (#5206), Scodies (#5212). **Domeland Additions** (#5305), Domeland Addition (#5207), Woolstaff (#5213), Cannell (#5209), Rincon

(#5208), and Moses (# 5203) For more information on how you can help preserve the South Fork Kern River, contact Robert A. Barnes, President, Tulare County Audubon Society, P.O. Box 749, Porterville, CA 93257, (209) 784-4477.

enlisting public interest and cooperation in protecting existing or potential wilderness areas.

President- Bob Schneider Treasurer- Jeff Barnickol Office Coordinator

The WILDERNESS REC-ORD is the bi-monthly publication of the California Wilderness Coalition. Address all correspondence to-P.O. Box 429, Davis, Ca. 95616. Telephone is (916) 758-0380. Articles may be reprinted. Credit would be appreciated.

## **Granite Chief**

Pressure to log and develop a major part of the Granite Chief Inventoried Roadless Area (IRA) continues to mount. disastrous by-product of the development would be a trans-Sierra road leading directly to the west shore of Lake Tahoe. Road building and logging scheduled by Southern Pacific Land Company for the Diamond Crossing area would inevitably result in link-up from Foresthill to the Barker Pass Road and the Tahoe Basin. The present roadless gap is only a few miles of easily developed terrain, with some of the route already staked out. Wilderness designation would block this road.

The road permit request by Southern Pacific Land Co. for construction in the Diamond Crossing area requires the preparation of an Environmental Analysis by the Forest Service. The analysis is scheduled to be completed in late September or early October. The Granite Chief Wilderness Task Force and the Sierra Club have presented strong

written statements to the Forest Service that a full **Environmental Impact** 

Statement must be prepared. The impacts of the proposed logging road additions on wilderness values and the high potential for link-up to Tahoe should receive complete public comment. The Task Force has also made an appeal to Assistant Secretary Cutler regarding the exclusion of a valuable roadless area of the Rubicon Canyon between Granite Chief and the Desolation Wilderness, but has heard nothing about it being added to the RARE II process.

The Task Force recommends writing to Regional Forester U.S. Forest Service, 630 Sansome St., S.F., CA. 94111 to offer support to Granite Chief (specify area # 5261, Calif.) and the adjacent area of the North Fork American River, (area # 5262). Send copies to the Governor, Congressman Harold T. Johnson, Senators Cranston and Hayakawa, Congressman McFall and state legislators in the

#### cont. from pg. 1

in Joshua Tree National Monument; Round Mtn. and South Ord Mtns. (#211) timbered with pinyon pine and also adjacent to Joshua Tree N.M.; Argus Mtns. (#132), much of which is in pristine condition with canyon and springs supporting riparian vegetation; Greenwater Range (#147), a large area of varied topography, petroglyphs, bighorn sheep, and great horned owls, and the Dublin Hills(#149).

Major areas that have still not been added to the inventory but which appear to fully meet 2(c) wilderness criteria include portions of the Imperial Sand Dunes (#362) between Hwy. 78 and U.S. 8; parts of the Cargo Muchacho Mtns. (#355A); parts of Cadiz and Ward Valleys (#305); Little Maria Mtns. (#325); Ivanpah Mtns. (#234); Kelso Peak (#160); Emerald Mtn.

(#184) which contains the endemic Eriogonum kennedyi (a buckwheat), Tortoise Preserve (#179) which has been

plagued by illegal motorcycle racing; Gravel Hills-Fremont Peak (#186); and Kingston Range (#154).

Tahoe region.

Citizens familiar with any desert areas should contact the BLM Team by Sept. 18 with their information.

The next phase of the BLM wilderness inventory will begin on November 1 with the release of a "Draft" wilderness inventory map and narratives. A ninety day comment period will then begin, and public

meetings to receive formal comments will be held between December 4 and 15. The meetings and 90 day

comment period will be a crucial time for desert wilderness. All concerned citizens must speak and write for wilderness to offset the massive objections expected to be raised by off-road vehicle users and miners.

As usual, the California Wilderness Coalition would appreciate receiving copies of letters written about specific desert wilderness

### National Park Service

#### Land Acquisition Policy

The National Park Service has announced proposed changes in policies governing National Park Service acquisition of private lands for inclusion in parks, primarily inholdings in existing units. The proposed policy was published in the Federal Register of August 11, 1978, and is available by writing to the Director, National Park Service, Department of the Interior, Attention: Policy Division, Washington, D.C. 20240.

The deadline for written comments, which may be

mailed to the above address, is September . 20, 1978. The 31 million acre National Park System has about 32,000 private property owners within authorized boundaries of park units. California areas to be affected by these proposed policies include Death Valley National Monument, Joshua Tree National Mon-

ument, Kings Canyon National Park, Lassen Volcanic National Park, Sequoia National Park and Yosemite National Park.

## Staff

**Record Staff** Jean Ketcham

Jim Trumbly Beth Newman Jane Russick Jim Eaton

Fred Gunsky Mike Nolasco

Deborah Alegnani Dave Brown

**PURPOSES OF THE CALI-**FORNIA WILDERNESS **COALITION:** ...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 be best used and preserved in the public interest by making and encouraging scientific studies concerning wilderness, and by

Officers of CWC Secretary-**Director- Steve Evans** Director- Jim Eaton

Deborah Alegnani

## RARE II and Environmental Quality

The outcome of RARE II will have significant impacts on wildlife and vegetation in California. Allocations will determine whether the remnants of old-growth forests and their associated wildlife will be preserved in their natural state, to evolve as they have for millions of years, or if they will be clearcut, overrun by ORV's and managed for early successional stage vegetation. Development allowed under non-wilderness allocations will lead to erosion of slopes and siltation and sedimentation of streams, reducing their suitability for trout, salmon and other native Many species of wildlife that have been exterminated from much of their former range and are now restricted to remote de facto wilderness areas, such as the fisher, cougar and wolverine, depend upon this habitat for continued existence.

The biological impact assessment of the RARE II draft environmental statement is seriously misleading and woefully

inadequate. Every contrivable and improbable negative impact of wilderness designation is detailed, but many severe negative impacts of development are glossed over or not even mentioned. For example, the Forest Service claims that wilderness designa-

tions will result in reduced wildlife diversity and abundance as forests proceed to the climax state due to constraints upon vegetative "manipulation"; however, they fail to mention that those species which depend upon climax forests for habitat (such as the spotted owl, pileated woodpecker,

northern flying squirrel, martin, fisher and wolverine) are the species which are approaching endangered status as their habitat is continuously destroyed.

Most species associated with disturbed and early successional vegetation in the National Forests (such as deer, skunks, ground squirrels, meadow mice and jays) are still relatively abundant because there is certainly a lot of disturbed habitat

available! Some activities allowed on non-wilderness lands in National Forests, such as motorcycle abuse, damage all vegetation types and disturb wildlife indiscriminately, not even benefiting that epitome of a modified-habitat species-the house mouse.

Also omitted in the E.S. is any attempt to quantify the disastrous effects on water quality and fisheries that may follow clearcutting or other "manipulation".

Many studies have shown that erosion from logging, and particularly logging road construction, reduces the productivity of streams, reduces the benthic insect fauna by reducing the

roughness for the streambed, damages the gills of adult fish directly, and suffocates the eggs and larvae of salmon and trout. A cool, deep-pooled, tree-lined trout stream can easily be

transformed into a lukewarm, shallow "rough" fish or fishless stream, particularly if riparian vegetation is removed. The economic impact assessment of the draft E.S. also fails to take into account the value of fish products of anadromous fisheries (steelhead trout and salmon) in their analysis. Annually, thousands of anadromous fish spawn in the clear streams which originate in the intact watersheds of RARE II areas, such as Eightmile Creek in the Siskiyous (area #5701) and Mill Creek (#5284), and provide food, jobs and sport. Their economic value

is dependent upon the maintenance of adequate water quality for spawning and larval survival. They represent a very real economic benefit of wilderness watersheds. Unfortunately, the Forest Service can only think of economic costs of wilderness designations.

RARE II areas in California include a variety of vegetation and habitat types of which old-growth forests are only an example. Alpine meadows, foothill oak woodlands and chaparral are also well represented. Several species of rare, threatened and endangered animals, as well as many rare plants, are found in these areas. When writing letters to the Forest Service concerning specific roadless areas (please see RARE II insert in the July-August 1978 Wilderness Record for details), it would be valuable to mention your interest in the preservation of these creatures, or even write a letter about an area just for the sake of an endangered wilderness species! A list of some species, their status, and some of the RARE II areas in which they are found is given in the table below. "Threatened" is a designation of the U.S.Bureau of Sport Fisheries and Wildlife; "Rare" is used by the California Department of Fish and Game; and "Endangered" is used by both agencies. The Forest Service does

not even admit that the critical habitat protection that would result from wilderness designations could benefit these species, claiming that "regardless of roadless area allocations they will continue to be

protected by law". In fact, they state that wilderness designation would cause

"loss of habitat" for some species due to lack of management. This brings up the question of how did these organisms ever survive and prosper before man arrived to "manage" their habitat? Habitat losses that could be regained by wilderness-incompatible management only involve areas in which a dense brush cover has been built up because of fire suppression. Forest Service-style management for habitat would require prescribed burns, but allowing small natural fires to burn and return to a natural fire cycle would be just as effective, and is permissible under wilderness management. It is also very questionable that the service will actually manage non-wilderness areas properly for wildlife, especially when conflicts with commercial interests occur. Wilderness designation is one of the best methods of preserving habitat for rare and endangered species, insuring regional diversity of other wildlife species, and preserving representative ecosystems in a near pristine state. It appears that the Forest Service has grossly slanted its biological analysis in order to support its diminutive recommendations for wilderness in RARE II. Your letters could help im-

prove the final E.S. and the

final actions taken.

## **Endangered Wildlife in RARE II Areas**

SPECIES	STATUS	RARE II #	RARE II NAME	NATIONAL FOREST			
Southern Bubban B	Rare	5180	Granite Peak	San Bernardino			
Southern Rubber Boa	Rate	5178	Deep Creek	San Bernardino			
Wolverine	Rare	5701	Siskiyou Also Sierra areas over	Six Rivers, Siskiyou and Klamath about 8,000 feet, and Shasta and			
			Six Rivers National Forests				
Paiute Cutthroat Trout	Threatened	4986	Carson-Iceberg	Toiyabe			
Kern Canyon Slender Salamander	Rare	5209	Cannell	Sequoia			
Kern Canyon Siender Salamander		5214	Mill Creek	Sequoia			
		5215	Greenhorn	Sequoia			
Unarmored Three-spine stickleback	Endangered	5006	Magic Mountain	Angeles			
Sicking Mt Salamander	Rare	5702	Indian Creek	Klamath			
Siskiyou Mt. Salamander		5703	Kangaroo	Klamath			
		5704	Condrey	Klamath			
Southern Bald Eagle	Endangered		Nests in several areas in Shasta-Trinity, Plumas and Lassen National Forests				
Spotted Owl	Threatened	hreatened 5701 Siskiyou Six Rivers, S Also found in other Northwest CA fore					
			Sierras				
California Condor	Endangered	5002	Sespe-Frazier	Los Padres			
California Bighorn Sheep	Threatened	5030-5046	Several	Inyo			
Peninsular Bignorn Sheep	Threatened	5188	Cactus Springs	San Bernardino			
Peninsular Bignorn Sneep		5189	Pyramid Peak	San Bernardino			
	Contraction in	5190	Spitler Peak	San Bernardino			
		5191	South Ridge	San Bernardino			
		5192	Black Mountain	San Bernardino			
	A THE PARTY AND ADDRESS.	5193	Cabazon Peak	San Bernardino			

Gulo luscus

WOLVERINE

California Wilderness	Coalition,	P.O.	Box	429,	Davis,	CA,	95616
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- ☐ Yes I wish to become a member of the California Wilderness Coalition for first-year membership Enclosed is \$
- ☐ Here is a special contribution of \$ to help with the Coalition's work.

ADDRESS

Individual Low-Income individual 500 Non-profit organization

Note: one dollar of annual

dues supports the Wilderness

25

not tax deductible

Sponsor (business)

ANNUAL DUES:

Record