

SAN JOAQUIN WILDERNESS ASSOCIATION and TEHIPITE CHAPTER, SIERRA CLUB

TO: Larry Moss, P.O. Box 267, Trinidad, CA 95570  
John Moore, 10 Gardenside, Apt. 2, San Francisco, CA 94131  
(415) 648-6034 (H); 666-4802 (W)  
FROM: George Whitmore, P.O. Box 5572, Fresno, CA 93755, (209) 224-3693  
RE: San Joaquin Roadless Area (5-047) and Jennie Lakes RA (5-200)  
DATE: 21 January 1979

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SAN JOAQUIN ROADLESS AREA (5047)

Reference to the enclosed map will make the following comments more meaningful.

(A5047)

Out of the total roadless area of 158,900 acres, 46,700 acres was recommended by the USFS for "wilderness." This is somewhat smaller than we had expected. The big surprise was that all of the remaining 112,200 acres went "non-wilderness."

(B5047)

"Non-wilderness" seems especially inexcusable on the Deadman-Glass Creek area on the east side, as a land management planning process is underway right now, yet a decision against wilderness has already been announced. (Lynn Foster will have submitted comments to you for the east side.)

Similarly inexcusable is "non-wilderness" for the whole eastern portion of the South Fork drainage. We feel this way for several reasons.

One is that the eastern portion of the South Fork is so inaccessible that its timber was never even entered into the allowable cut calculation until just the last couple years or so. The USFS has been looking at the timber for years and still doesn't have a plan for any economically feasible method of removing it.

The USFS now says they feel helicopter logging on the east side of the South Fork would be feasible; but, when asked, they were not able to produce any documentation to back up this opinion. It is our belief that helicopter logging is not economically feasible anywhere in central California, and that the USFS is simply subsidizing helicopter sales with low stumpage prices in order to encourage development of helicopter technology. We do not feel that this would meet conventional criteria of "economic feasibility."

The east side of the South Fork is the subject of a USFS "transportation study" which is currently underway, the purpose being to try to determine whether any aerial or surface method of timber transport would be feasible. This study apparently has not yet produced any information to substantiate the USFS' current opinion that helicopter logging would be feasible. Even though the study is ongoing, the USFS has already assumed what its conclusion will be.

The supposed need to extract the east side of the South Fork's timber resource was given as the main reason for making the "non-wilderness" decision. For the USFS to make a decision of such finality while they are still in the midst of a feasibility study, and especially in view of the severe access problems which prompted initiation of the study, seems grossly irresponsible.

Besides a compulsion to harvest (probably) uneconomic timber which was not even in the allowable cut base until recently, the USFS says area B5047 does not have high wilderness attributes, has mineral potential, and is needed for dispersed recreation. Upon inquiring, we found that all 112,200 acres of B5047 was analyzed as though it were a single unit. In fact, it consists of four non-contiguous parcels widely divergent in character and spread over a vast area. This means that mineralization in one area was used to argue against wilderness for a separate area as much as 28 airline miles away. Similarly, a perceived low "wilderness attribute" in one area was used to pull down the average score which was then applied to a separate area as much as 28 or 30 airline miles away. Such methodology is preposterous, but these are among the reasons we were given when we asked why the east side of the South Fork was not recommended at least for "further planning."

The poor quality of work done by the USFS in the RARE II process is apparent also in the boundaries they selected for their "wilderness" recommendation (area A5047). Note the blue cross-hatched areas on the enclosed map.

The northerly cross-hatched area is especially noteworthy. The solid blue line follows a prominent ridge which divides two major watersheds. This ridge was recommended as a possible wilderness boundary by Zane Smith when he was supervisor on the Sierra National Forest; it was given great importance as a possible wilderness boundary by the immediate past district ranger (Gary Morgan); and it was the boundary of the old RARE I Wilderness Study Area. Consequently, we were incredulous to find that the USFS is now ignoring the natural boundary offered by this ridge and has run a new line down across several miles of sidehill totally lacking in readily identifiable landmarks. All this to avoid a very low-standard road to a mine claim that is probably not valid. The Wilderness Act permits access to valid mining operations, so there seems no need to exclude this area. At the very most, nothing more than a narrow corridor should have been left for the road (as was done in the inventory process). It is inexcusable to butcher the integrity of a proposed wilderness when there is absolutely no necessity for doing so.

The proposed wilderness boundary at the north end of the South Fork area again illustrates sloppy work. The line was chosen because it supposedly follows a clearly definable ridge. In actuality, a parallel ridge a short distance to the south is far more prominent, as on-the-ground inspection readily proves. The USFS rejected the latter ridge as being less prominent, clearly demonstrating their lack of knowledge of the terrain.

The USFS's proposed wilderness boundary at its southwest extremity arbitrarily excludes two or three miles of wild and rugged canyon coursed by the main river. The reason given was that the canyon does not lend itself to drawing logical boundary lines! Again, we feel this demonstrates sloppy work which badly needs revision.

We trust our remarks regarding sloppy drawing of boundaries for the "wilderness" recommendation (A5047) will not detract from our primary concern, which is the disastrous loss of the entire South Fork to "non-wilderness."

3.

The east side of the South Fork is a unique area with high wilderness values. (See enclosed comments on this area submitted by the Sierra Club's Tehipite Chapter in the RARE II process.) It is very important to us, and to see it written off in so cavalier a manner is rankling. Last summer we had conveyed to the USFS our concern for this area, and suggested that we could live with losing the west side of the South Fork, and the Granite Creek drainage (just west of the North Fork), provided the east side of the South Fork went at least "further planning." This attempt at being reasonable was in vain, for it now turns out that we lost everything, including the area which we had made clear was our highest priority.

Of course we wouldn't object to seeing all 158,900 acres of 5047 go "wilderness," or all 112,200 acres of B5047 go "further planning." But if these best of all possible worlds are not attainable, then at the very least we must see "further planning" for the east side of the South Fork. That is a true "bottom line," and beyond that there is nothing to negotiate. (And that is precisely why any legislation should encompass much more.)

(To repeat, the above comments are for the west side only. Lynn Foster will have sent you comments for the east side.)

4.

Timber Inventory (MMBF) \*  
Sierra National Forest only (?)

		area A5047	area B5047	totals
Present allowable cut base	mixed conifer	35	776	811
	red fir	54	244	298
	totals	89	1,020	1,109
Productive deferred (because of RARE I Study Area)	mixed conifer	41	5	46
	red fir	372	0	372
	totals	413	5	418
		502	1,025	1,527

Potential Annual Yield (MMBF) \*\*  
Sierra National Forest only

	South Fork	North Fork and Granite Creek	Total
East side	8-10 (Pincushion)	2-3 (77 Corral)	-----
West side	8-9 (Crater (Rattlesnake 2-3))	2-3 (Granite Creek)	-----
Totals	16-19	4-6	20-25

Area A5047

Area B5047

77 Corral 2-3

Pincushion 8-10 (less that part in Area A)

Crater/Rattlesnake 8-9  
Granite Creek 2-32-3 (plus that part of  
Pincushion in Area A)18-22 (less that part of Pin-  
cushion in Area A)

This figure is in rough agreement with the "programmed harvest" figure of 18.6 mmbf given in the USFS "decision documents." However, if the 18.6 mmbf programmed harvest figure is combined with Area B's stated inventory of 1,025 mmbf (see above), it comes out to a rotation age of 55 years! (A more commonly used figure for west slope pine is 120 years.) This would indicate either a gross error in the figures (perhaps the programmed harvest should be closer to 9 mmbf), or else it indicates that the USFS intends to convert Area B5047 into a pole farm, which is inconsistent with their avowed concern for wildlife and dispersed recreation.

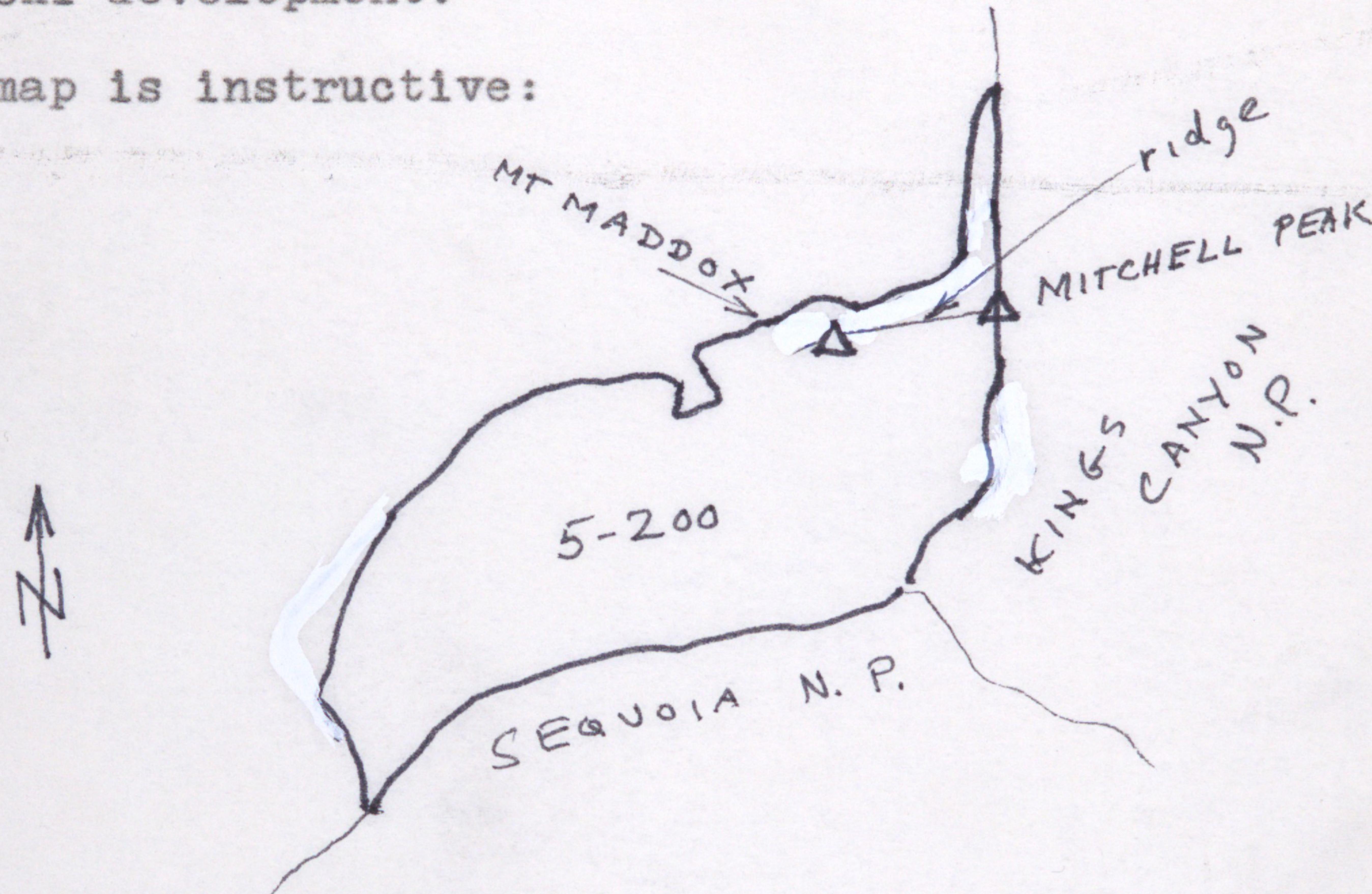
\* Source: John Kruse, Sierra N.F. (19 Jan 79) via H. Thomas (20 Jan 79)

\*\* Source: J. Kruse (31 Aug 78) via H. Thomas (16 Nov 78) and G. Whitmore  
All figures are approximate only, but they are the best currently available.

JENNIE LAKES ROADLESS AREA (5200)

The entire 13,700 acres was designated "non-wilderness." In searching the USFS "decision documents," we have found only one reason given, and this is that "this area contains the Mitchell-Maddox ski area which has high potential for ski development."

A look at the map is instructive:



The ski development would be on the north side of the Mitchell-Maddox ridge. That ridge would be the logical boundary of any wilderness, and a ski development need not impinge on the wilderness potential.

Furthermore, the decision documents state "...it is necessary to have this area immediately available for formal (ski) study..." Why the USFS feels "further planning" is inconsistent with their desire to study the area for ski development is totally unclear.

Either the roadless area boundary could have been adjusted to delete the area which might become involved in a ski development (and the balance of the area recommended for "further planning" or "wilderness"), or all 13,700 acres could have been designated "further planning." In either case, there would have been no conflict with the area's ski potential.

Another factor which might have influenced the USFS decision was that they were totally unaware that the Park Service is recommending that their wilderness come right to the Park boundary (ie. contiguous with the Jennie Lakes IRA). We pointed this out to the Sequoia N.F., but they rejected our statement, claiming it was erroneous. We double-checked with the Park Service and found that it was the USFS which was wrong, and not ourselves. But in the meantime the RARE II process had progressed beyond the point where corrections of erroneous information could have any effect on the outcome.

Jennie Lakes is a very scenic area whose natural values are well known and appreciated by many. It deserves better than the shabby treatment accorded it in the RARE II process. (Even some USFS planners were known to have felt that it would make a good wilderness...so what went wrong with the process?)

Tehipite Chapter, Sierra Club letterhead

14 February 1979

Larry E. Moss  
P. O. Box 267  
Trinidad, CA 95570

Re. San Joaquin Roadless Area (5-047), and  
Jennie Lakes Roadless Area (5-200)

Dear Larry,

SAN JOAQUIN ROADLESS AREA (5-047)

Reference to the map dated 14 February 1979 (sent under separate cover) will make the following comments more meaningful.

Out of the total roadless area of 158,900 acres, that portion recommended by the USFS for "wilderness" (A-5047) was only 46,700 acres. This is somewhat smaller than we had expected. The big surprise was that all of the remaining 112,200 acres went "non-wilderness" (B-5047).

"Non-wilderness" seems especially inexcusable on the Deadman-Glass Creeks area on the east side, as a land management planning process is underway right now, yet a decision against wilderness has already been announced by the USFS. (Lynn Foster has elaborated on this point in comments sent to you separately.)

Similarly inexcusable is "non-wilderness" for the whole eastern portion of the South Fork drainage, in the Sierra National Forest portion of the roadless area. We feel this way for several reasons.

One is that the eastern portion of the South Fork is so inaccessible that its timber was never even entered into the allowable cut calculation until just the last couple years or so. The USFS has been looking at the timber for years and still doesn't have a plan for any economically feasible method of removing it.

The USFS now says they feel helicopter logging on the east side of the South Fork would be feasible; but, when asked, they were not able to produce any documentation to back up this opinion. It is our belief that helicopter logging is not economically feasible anywhere in central California, and that the USFS is simply subsidizing helicopter sales with low stumpage prices in order to encourage development of helicopter technology. We do not feel that this would meet conventional criteria of "economic feasibility."

The east side of the South Fork is the subject of a USFS "transportation study" which is currently underway, the purpose being to try to determine whether any aerial or surface method of timber transport would be feasible. This study apparently has not yet produced any

information to substantiate the USFS' current opinion that helicopter logging would be feasible. Even though the study is ongoing, the USFS has already assumed what its conclusion will be.

The supposed need to extract the east side of the South Fork's timber resource was given as the main reason for making the "non-wilderness" decision. For the USFS to make a decision of such finality while they are still in the midst of a feasibility study, and especially in view of the severe access problems which prompted initiation of the study, seems grossly irresponsible.

Besides a compulsion to harvest (probably) uneconomic timber which was not even in the allowable cut base until recently, the USFS says area B-5047 does not have high wilderness attributes, has mineral potential, and is needed for dispersed recreation. Upon inquiring, we found that all 112,200 acres of B-5047 was analyzed as though it were a single unit. In fact, it consists of four non-contiguous parcels widely divergent in character and spread over a vast area. This means that mineralization in one area was used to argue against wilderness for a separate area as much as 28 airline miles away. Similarly, a perceived low "wilderness attribute" in one area was used to pull down the average score which was then applied to a separate area as much as 28 or 30 airline miles away. Such methodology is preposterous, but these are among the reasons we were given when we asked why the east side of the South Fork was not recommended at least for "further planning."

The poor quality of work done by the USFS in the RARE II process is apparent also in the boundaries they selected for their "wilderness" recommendation (area A-5047). In this regard, two of the purple outlined and cross-hatched areas on the accompanying map are worth noting.

The one to the northwest, in the Green Mountain-Cattle Mountain area, is especially notable. The west side of this area, marked by the purple line, follows a prominent ridge which divides two major watersheds. This ridge was recommended as a possible wilderness boundary by Zane Smith when he was supervisor on the Sierra National Forest; it was given great importance as a possible wilderness boundary by the immediate past district ranger (Gary Morgan); and it was the boundary of the old RARE I Wilderness Study Area. Consequently, we were incredulous to find that the USFS is now ignoring the natural boundary offered by this ridge and has run a new line down across several miles of sidehill totally lacking in readily identifiable landmarks. All this to avoid a very low-standard road to a mine claim that is probably not valid. The Wilderness Act permits access to valid mining operations, so there seems no need to exclude this area. At the very most, nothing more than a narrow corridor should have been left for the road (as was done in the inventory process). It is inexcusable to butcher the integrity of a proposed wilderness when there is absolutely no necessity for doing so.

To the southwest, in the main river canyon below Balloon Dome, the USFS's proposed wilderness boundary arbitrarily excludes two or three miles of wild and rugged canyon. The reason given was that the canyon does not lend itself to drawing logical boundary lines! We feel this is a further illustration of sloppy work which badly needs revision.

We trust our remarks regarding sloppy drawing of boundaries for the "wilderness" recommendation (area A-5047) will not detract from our

3.

primary concern, which is the disastrous loss of the entire South Fork to "non-wilderness."

The east side of the South Fork is a unique area with high wilderness values. (See enclosed comments on this area submitted to the Forest Service by us in the RARE II process.) It is very important to us, and to see it written off in so cavalier a manner is rankling. Last summer we conveyed to the USFS our concern for this area, and suggested possibilities for a compromise which would protect the east side of the South Fork while still leaving the door open to possible timber harvesting on the west side of the South Fork (Crater-Rattlesnake area) and in the Granite Creek drainage (just west of the North Fork). This attempt at striking a balance acceptable to most interest groups was in vain, for it now turns out that we lost everything, including the area which we had made clear was our highest priority.

We are requesting a wilderness recommendation for the east side of the South Fork, the area east of the Green Mountain-Cattle Mountain ridge, and the gorge of the main river below Balloon Dome. We are requesting "further planning" for all other lands to the west because of high wilderness values for some of it, low commodity values for much of it, and a general lack of information and/or attention. (Archeological values are said to be exceptionally high in parts of the west side of the South Fork and Granite Creek, part of the land adjoins Yosemite National Park, and part of it was actually recommended by the USFS for Wilderness Study status at one point in the RARE I process.)

Those portions of the roadless area east and north of Devils Postpile National Monument, and up to the Sierra Nevada crest (Madera-Mono County line), are not proposed for any development that we are aware of. These areas are highly scenic and are traversed by both the John Muir and Pacific Crest Trails (which happen to have separate routes in this particular area). We feel that the wilderness recommendation should be extended to include these areas in order to protect the two unique trail systems which traverse them, and also to protect a stand of red fir on the west side of Mammoth Mountain; protection for this particular forest has been sought by many people, and we concur in their efforts to protect it.

We also concur with the recommendation of many citizens that "further planning" would be an appropriate RARE II designation for all roadless lands east of the Sierra crest (Mono County), including the Sherwin Roadless Area (5-046).\* It is evident that the various ski development proposals for these areas need to be studied much more thoroughly before any valid decisions can be made. In the meantime, "further planning" would keep all land management and resource allocation options open. It is not acceptable to refuse to give further consideration to an area's wilderness potential simply because someone thinks it might be appropriate for downhill ski development.

\*i.e. the remainder of area 5-047, but also including area 5-046.

G. Whitmore to L. Moss

San Joaquin &amp; Jennie Lakes

14 Feb 79

4.

Timber Inventory (MMBF) \*  
Sierra and Inyo National Forests

		area A-5047	area B-5047	totals
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77 Corral 2-3	Pincushion 8-10 (less that part Crater/Rattlesnake 8-9 in Area A) Granite Creek 2-3
2-3 (plus that part of Pincushion in Area A)	18-22 (less that part of Pincushion in Area A)

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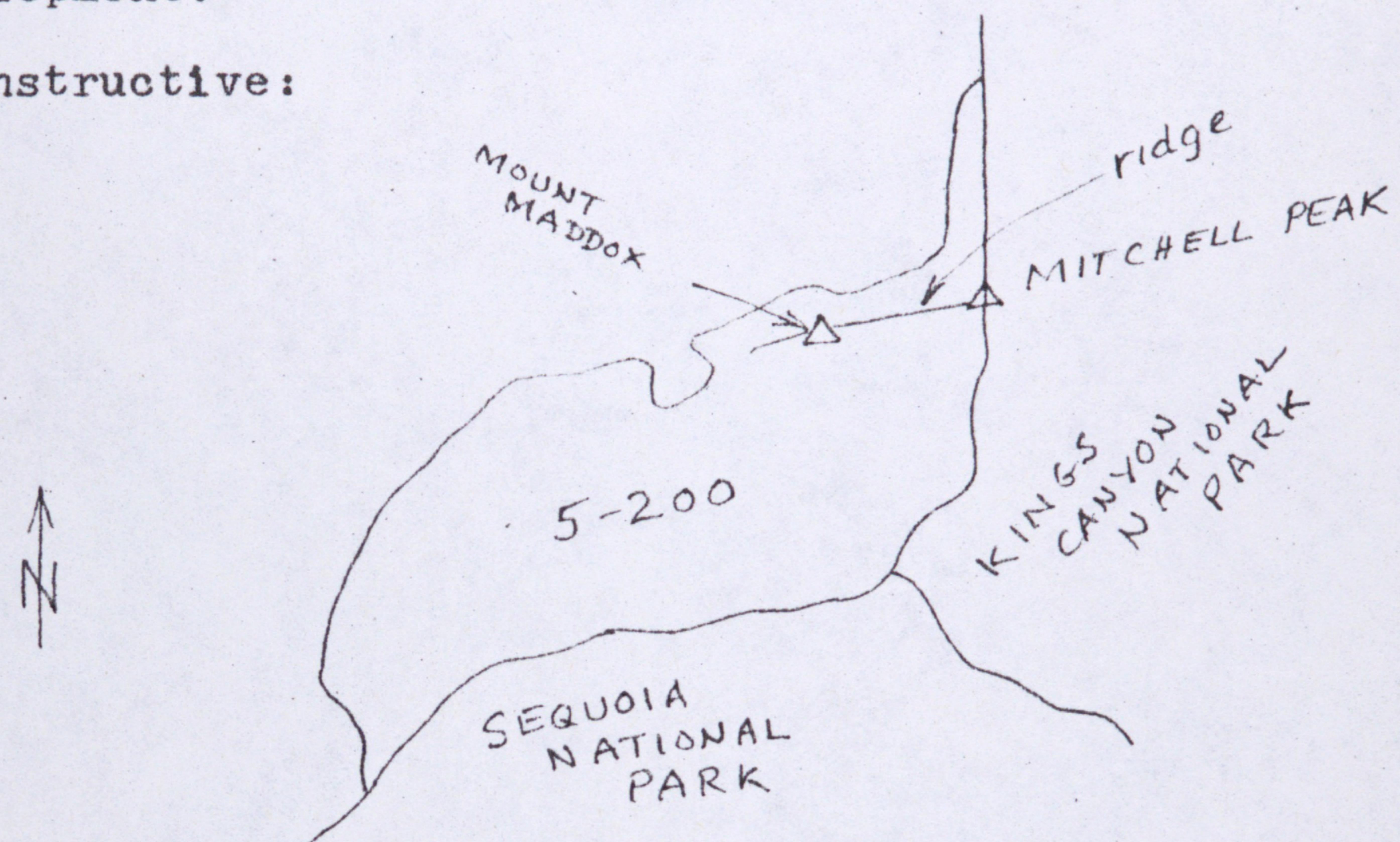
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5.

## JENNIE LAKES ROADLESS AREA (5-200)

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A look at the map is instructive:



The ski development would be on the north side of the Mitchell-Maddox ridge. That ridge would be the logical boundary of any wilderness, and a ski development need not impinge on the wilderness potential.

Furthermore, the decision documents state that "...it is necessary to have this area immediately available for formal (ski) study..." Why the USFS feels "further planning" is inconsistent with their desire to study the area for ski development is totally unclear.

Either the roadless area boundary could have been adjusted to delete the area which might become involved in a ski development (and the balance of the area recommended for "further planning" or "wilderness"), or all 13,700 acres could have been designated "further planning." In either case, there would have been no conflict with the area's ski potential.

Another factor which might have influenced the USFS decision was that they were totally unaware that the Park Service is recommending that the National Park wilderness come right to the Park boundary (i.e. contiguous with the Jennie Lakes IRA). We pointed this out to the Sequoia National Forest, but they rejected our statement, claiming that it was erroneous. We double-checked with the Park Service and found that it was the USFS which was wrong, and not ourselves. But in the meantime the RARE II process had progressed beyond the point where corrections of USFS misconceptions could have any effect on the outcome.

Jennie Lakes is a very scenic area whose natural values are well known and appreciated by many. It deserves better than the shabby treatment accorded it in the RARE II process. (Even some USFS planners were known to have felt that it would make a good wilderness...so what went wrong with the process?)

Sincerely,

George W. Whitmore  
P.O. Box 5572  
Fresno, CA 93755  
(209) 224-3693



# San Joaquin Wilderness Association

Post Office Box 9856, Fresno, California 93794

30 March 1979

TO: Hal Thomas  
FROM: George Whitmore  
SUBJECT: Policy/strategy decisions, esp. re. the west side.

I feel it is essential that we distinguish between policy (which I would define as "what we want"), and strategy (which I would define as "how we propose to get it").

### Re. Policy:

I have been assuming that we want the "maximum feasible" wilderness, meaning that we would seek wilderness status for as much of the area as possible without asking for so much that we run the risk of appearing unreasonable to legislators whose support we must obtain.

### Re. Strategy:

I feel that, if we are to achieve the "maximum feasible" wilderness, we cannot afford to give up any portion of the roadless area without knowing that it is necessary to do so. And, in the event that this may become necessary, we should seek something (such as introduction of a bill) in return.

Specifically, I feel it would be a serious error to give up some acreage (or timber, or ski development sites, etc.) in an attempt to appear reasonable without first having approached legislators whom we wish to carry our bill. We should make these approaches first, and be prepared to make some concessions only if it turns out to be necessary to do so.

I suggest we be prepared to make acreage concessions in the sequence we discussed a few weeks ago. That is, first give up the Granite Creek area, then the west side of the South Fork, then the Jackass-Chiquito "panhandle."

I suggest we consider an additional form of possible concession, which would be to settle for congressionally mandated "Wilderness study" status for some of these lands (as opposed to immediate wilderness designation).

Adoption of a fixed position would very likely mean either that we would give up something needlessly, or that we would be asking for more than our potential sponsors would be willing to carry. Either of those events would be unfortunate, and both can be avoided by staying flexible. Ie. Let's keep our feet out of the wet concrete!



Tehipite Dome by W. A. Starr 1896

# TEHIPITE CHAPTER SIERRA CLUB

P. O. Box 5396  
Fresno, California 93755

26 November 1979

Honorable John Seiberling, Chairman  
Interior Subcommittee on Public Lands  
House of Representatives  
Washington, D.C. 20515

Attention:  
Andrew Wiessner  
Room 408, Annex I

Sir:

Please accept the following material for the hearing record on California Wilderness legislation, H.R. 5578 and H.R. 5586.

These comments are on behalf of the Tehipite Chapter of the Sierra Club, and are in addition to the oral testimony which I gave before your subcommittee on November 16.

Thank you.

Sincerely,

*George W. Whitmore*

George W. Whitmore