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From: Fred Roberts, frdroberts@aol.com

 **Date: January 21, 2014**

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**Subject: Objection to the failure of the Lake Tahoe Basin Management Unit's
Forest Plan to include new designated wilderness areas.**

I, and the members of our Wilderness Committee of the Tahoe Area Sierra Club, strongly object to your decision to select a plan (alternative E) which does not include new wilderness designations. The decision was made in spite of your appraisal of Dardanelles and Freel Roadless area as wilderness appropriate. The decision was also made in spite of my recommendations (Roberts, Fred 8/2012) that Meiss Country (Dardanelles), Granite Chief additions, Desolation additions, Trimmer Peak and Hell Hole were wilderness appropriate and deserved wilderness status. We find the decision of your agency to be shortsighted as forces of forest degradation are increasing and time is running out to make these critical decisions.

The Final Lake Tahoe Basin's Management Plan has been released at a time in history (November 2013) when the basins natural communities are encountering growing and unprecedented shocks.

- California's population has surged to 38.2 million an increase of 332,000 in the last year portending increasing numbers of hikers, bikers, snowmobilers, and off-road vehicle users wanting their share of Tahoe's treasure. At this pace an additional five million people would inhabit California in the 15 year life of the plan.
- Climate change predictions for the Basin suggest drought will increase in frequency and severity (Saffold, 2010) threatening the health of forests, wetlands, and their wildlife in the Tahoe Basin.

- Erosion, nutrient release, and air pollution have caused Lake Tahoe's water clarity to decline from 100 feet in 1960 to about 70 feet today. Climate change also drives the problem as water temperature of Lake Tahoe has increased 1 degree Fahrenheit in the last 30 years threatening the lakes clarity (Margaret Moran, 2013).

In the face of these problems, the emphasis of your agency on balancing the competitive interests of forest users ignores the major underlying issues. Balancing biking, snowmobiling, hiking, off-road vehicle use, and other uses to create a balance of winners and losers, is a political decision. Whether the various users are happy is really secondary to the issue of preserving these forests and protecting the watershed of the Lake Tahoe Basin. In the long term, these forests, once designated as wilderness, will provide valuable and necessary natural services for all of the stakeholders of the Tahoe basin. The decision to be made is not a political decision to balance the many disparate uses but a crucial regional ecosystem-management decision designed to serve us all.

These candidate wilderness areas need to remain as intact healthy forests to ensure that they continue to provide the vital ecological services that are necessary to support our long term health as well as the health of the economy of the Basin. They function as healthy watershed, reducing erosion, providing clean water, and helping to protect the clarity of Lake Tahoe. Their trees sequester CO₂ to help ameliorate climate change. As healthy intact forests, they are also vital to the existence of a diverse variety of wildlife species. Only wilderness designation can provide the high level of forest health required.

Your agency found pristine conditions at the Dardanelles and Freel that caused you to propose them for wilderness areas in Alternatives you did not select (C and D). We found those same pristine conditions in Meiss (Dardanelles), Granite Chief Addition, Desolation Addition, Hell Hole and Trimmer Peak. Without the protection of wilderness status, these candidate wilderness areas will degrade from overuse during the fifteen year life of the plan until they are no longer wilderness appropriate. The loss of candidate wilderness area will be irrevocable.

Our wilderness committee members and others have made numerous excursions into the candidate wilderness areas to evaluate and experience them. Putting their vital services aside, we were stunned by their unspoiled majesty and terrified to think of their future without protection as wilderness.

We feel that all of these candidate wilderness areas are necessary for the reasons stated above. If it is not possible to designate them all, however, we feel that the strongest case can be made for a wilderness designation for the Dardanelles. We recommended 10,500 acres of Meiss Meadows (Dardanelles) and your agency proposed 14,227 acres in the Dardanelles. These are essentially the same recommendation. Meiss Meadows features intact forests, meadows, spectacular scenery, and an established self-sustaining, fluvial population of Lahontan Cutthroat Trout. It serves as the headwaters for Upper Truckee River, the largest tributary to Lake Tahoe. Preserving the integrity of Meiss Country is of utmost importance to maintain the quality of water destined for Lake Tahoe and to

protect the established population of Lahontan Cutthroat Trout. The area also creates less conflict with other users since the Pacific Crest Trail runs through Meiss Meadows and biking and OHV access is prohibited on the trail.

Granite Chief Addition is also a strong case. The forests there provide watershed for both Ward and Blackwood Creek. Late seral (old-growth) hemlock and red fir forests near the border of Granite Chief were unsurpassed by any we saw in our evaluations.

Another strong case can be made for Desolation Additions. Much of the addition is steep, creating difficult access, which should reduce management costs. It also plays an important role by providing healthy watershed.

In summary, the Basin's forests and wetlands, and Lake Tahoe itself are facing growing forces of degradation – increasing population, increasing frequency and severity of drought, increasing nutrient release into the lake to name a few. The candidate wilderness areas provide ecosystem services that mitigate these forces. With wilderness status, these forests and watersheds will remain intact into the future, continuing to provide these services. Without wilderness status, they will degrade with overuse. In this case, the services they provide to protect the environmental quality of the basin erodes as does their wilderness appropriateness. The loss of these wilderness treasures will be permanent.

Moran Margaret, 2013. Scientists: Climate change impacting Tahoe clarity.

<http://www.recordcourier.com/news/6900551-113/lake-tahoe-goldman-clarity>

Safford, Hugh, 2010. A summary of current trends and probable future trends in climate and climate driven processes in the Lake Tahoe Basin and the neighboring Sierra Nevada. Version 2, USFS.

ADDENDUM

We object to A MISTATEMENT OF FACT, as well as the FLAWED RATIONALE used by the USFS to avoid recommending qualified candidate wilderness areas in the plan. During the Webinar of January 14, 2014, we asked what their rational was for the not recommending additional wilderness. The response was:

....We feel the lands that were potentially recommended for Wilderness in some of the other alternatives than the one selected are well protected as they remain Backcountry Areas in the Draft Decision. So that the, recommending them as wilderness does not add any protections to those lands. In addition many of those lands that could be recommended for Wilderness, that have that appropriate character, are currently used by mechanized, that's mountain bikes as well as over snow vehicles and we felt that the balance of recreational opportunities that we currently have is appropriate to what we should provide here in the Basin.....

FIRST:

It is a MISTATEMENT to say that recommending these lands for wilderness does not add any protections to them. Backcountry designation allows uses that are not allowed in Wilderness. For example, the "Stanford Rock" area, one of the areas that we have recommended for wilderness designation (Granite Chief Additions), will continue to allow over snow vehicle use, even after being designated a backcountry management area in the adopted forest plan .This would not be allowed if it were designated a wilderness area.

SECOND:

Their RATIONALE IS DEEPLY FLAWED when it is said that "...those lands that could be recommended for Wilderness, that have that appropriate character, are currently used by mechanized, that's mountain bikes as well as over snow vehicles...". Our objections stated throughout our comments above point out that these candidate wilderness areas will deteriorate with mechanized use, and other inappropriate activities, changing their character to the point that they no longer maintain their wilderness character and, even worse, no longer provide their essential ecological services to the Tahoe Basin.

THIRD:

Their RATIONALE IS DEEPLY FLAWED when LTBMU chooses to balance recreational activities at the expense of wilderness characteristics. They stated:

"... we felt that the balance of recreational opportunities that we currently have is appropriate to what we should provide here in the Basin....."

The balance of recreational opportunities that LTBMU is attempting to reach may be appropriate for balancing recreational activities, but not to sustaining pristine forests with wilderness characteristics that are currently under siege by some of the very recreational activities they allow. The Forest Plan gives preeminence to meeting public requests for recreational uses. Overtime those requests will only increase with the increasing numbers of people. Meanwhile the pristine wilderness forests are diminishing in quality and quantity.