

April 22, 1016

Superintendent, Sequoia and Kings Canyon National Parks
ATTN: Cahoon Meadow Project
47050 Generals Highway
Three Rivers, CA 93271.

Sent Via the Internet

Dear Superintendent,

Wilderness Watch is providing these comments on the environmental assessment (EA) entitled Environmental Assessment for the Restoration of Cahoon Meadow Sequoia National Park. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship and administration of the National Wilderness Preservation System. Wilderness Watch appreciates the concern for wet meadows, however we believe the project as proposed is contrary to the letter and spirit of the Wilderness Act. This project raises several serious concerns.

This project is not minor. Any motorized intrusion in wilderness seriously damages the Wilderness. In this case, **the extensive use of heavy equipment, helicopters and other motorized equipment goes well beyond other proposals we have seen.** Even nonconforming uses tied to valid existing rights generally don't involve such extensive use of heavy motorized equipment.

It should go without saying that a project **utilizing up to 50 helicopter flights, about 30 days of bulldozer use, and 30 days of motorized equipment, all in year two, can hardly be consistent with the spirit of the Wilderness Act. The previous sentence does not take into account possible helicopter work in year three, other motorized use during all four years, and any motorized or helicopter use for the removal of the wells and stream logger, up to ten years after the project is begun (NOTE: There are also inconsistencies in the amount of heavy motorized use between the EA and MRDG). In Wilderness, the means are generally more important than the ends, and in this case the means are extraordinarily out of sync with the Wilderness Act.**

We also question why this project is being proposed now, and why it has to happen on a modern-day industrial scale and timeframe. The National Park Service (NPS) has owned this land for 35 years and apparently didn't find the erosion so important, but now the area is designated as Wilderness, the NPS is launching a full-scale assault. In any case, the meadows are within the John Krebs Wilderness, which was only recently designated as Wilderness (2009).

The fundamental tenet of wilderness stewardship—untrammeled or wild--was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight "fundamental principles" for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, "Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness.... Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness." In this case, the proposed extensive use of heavy machinery in Wilderness directly conflicts the Wilderness Act as well as with wildness or untrammeled wilderness as a fundamental tenet.

Even if the trammeling is justified, and that is certainly debatable, the means are not. Humans completed much bigger projects before there were helicopters and bulldozers, with today's technology,

engineering skills and resources there is no question this project could be completed without this equipment that has no place in Wilderness. Even in Wilderness there have been projects on this scale or larger that have been completed with traditional skills. Examples include the Canyon Creek dam repair in the Selway-Bitterroot Wilderness and the Cabin Creek landing meadow maintenance in the Frank Church-River of No Return Wilderness.

We believe NPS needs to reconsider its approach and to respect the constraints imposed by the Wilderness Act. Those constraints are meaningful and the agency is required to act within the law. The NPS should not be flouting its use of helicopters and heavy equipment just because it thinks it can. This project represents a shameful descent in wilderness ethics.

The MRDG considers a couple of non-motorized options, but the EA doesn't fully analyze them. The EA claims the non-motorized options are not feasible because the gradient is too steep, it is too dangerous to do them, to do so or would take too long to recover the meadow. Yet the scoping materials clearly show success from the 1940s using check dams, implemented without heavy motorized equipment.

Thus, the EA does not adequately look at a range of options. Dams and other structures were built (prior to designation) in many Wildernesses and have been maintained that way ever since. The US Forest Service built, prior to designation, and maintains meadow runways for aircraft—ironically, some of them designed to dry out meadows—with horse drawn equipment. These examples counter the contention in the EA and MRDG that this can't be accomplished by non-motorized means. There are federal resources that can be used to learn how to do necessary projects in Wilderness using traditional skills.

The agency needs to take a little more time and come up with an option that is compatible with Wilderness. Please keep Wilderness Watch updated on this project.

Sincerely,

Gary Macfarlane
Board member