

Tule River Conservancy

P.O. Box 723
PORTERVILLE CA 93258
559 781-8445

January 28, 2016

SUBMITTED ELECTRONICALLY TO: <http://tinyurl.com/earlyadoptersfpr>

SUBJECT: Consideration of the Tule River for Inclusion in the National Wild and Scenic Rivers System

Dear Ms. Ehmann,

The Tule River Conservancy and the Sequoia Task Force/Sierra Club urge Sequoia National Forest to complete a systematic and comprehensive inventory and evaluation of potential Wild and Scenic Rivers in the Inyo, Sequoia, and Sierra Forest Plan Revisions.

We are particularly concerned that you give serious consideration of the Tule River in your evaluation process. We believe there is a high potential for all forks of the Tule River that are on Sequoia National Forest lands to meet criteria for inclusion in the National Wild and Scenic Rivers System.

The National Wild and Scenic Rivers System was created by Congress in 1968 (Public Law 90-542; 16 U.S.C. 1271 et seq.) states, "It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

The Tule River is a gem that must be comprehensively evaluated for qualifying as a candidate for inclusion in the National Wild and Scenic River System. The Tule River is unique among all the rivers of the Sierra Nevada. It provides those outstanding 'remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural' values that the Act is intended to protect. However, during past evaluations of rivers, the Tule River system has often been ignored or evaluated in a cursory manner. This is an oversight that must be rectified.

Every fork of the Tule River originates and traverses through groves of the largest trees on earth, the Giant Sequoia (*sequoiadendron giganteum*). The Tule River and its tributaries provide the surface and subterranean water that sustains life for these magnificent trees with their shallow but extensive root systems. Spectacular scenery, waterfalls, opportunities for a wide variety of recreation from pristine, primitive hiking and camping and opportunities for more developed recreation abound. Numerous sensitive, rare and endangered plant and animal species, archaeological treasures, and historic resources are harbored along its varied routes and in the several roadless areas it traverses. All forks of this unique river must be evaluated and inventoried; a thorough and serious evaluation would reveal that all the portions of the Tule that are contained within Sequoia National Park and the Giant Sequoia National Monument should be recommended for inclusion in the National Wild and Scenic Rivers System.

The North Fork of the Tule River

The North Fork of the Tule River (19.0 miles (30.6 km) long)¹ begins high on a ridge facing south towards the Middle Fork Tule River drainage in Sequoia National Park. It flows through the rugged granite reaches through the Dillonwood Grove with towering trees more than 2000 years old. This grove is biologically a part of the Garfield Grove. Then the river plunges madly southwest down a canyon in the Giant Sequoia National Monument and is joined by Kramer Creek and Backbone Creek as it enters a broader and less inclined valley. At Milo, the river turns southeast and parallels the Springville-Milo Road. Sycamore and Whitney Creeks join the river from the east and west, respectively, before it meets the Middle Fork at Springville.

The Middle Fork of the Tule River

The Middle Fork of the Tule River has two branches.

The North Fork of the Middle Fork of the Tule is also known as the “Wishon Fork.” This Fork has its headwaters in Sequoia National Park, flows a short distance through the Golden Trout Wilderness before entering the Giant Sequoia National Monument. It flows through a spectacular array of sequoia groves including the Upper Tule, Middle Tule, Maggie Mountain, Silver Creek, Burro Creek and Wishon Sequoia Groves. A significant portion of this Fork is enclosed in the Moses Roadless Area, an area recommended for inclusion into the Wilderness System in the Giant Sequoia National Monument Plan. This stretch of the river includes a hiking and stock trail, which provides access to this nearly untouched stretch of groves that John Muir felt were the grandest of them all.

¹ U.S. Geological Survey. National Hydrography Dataset high-resolution flowline data. [The National Map](#), accessed March 15, 2011

The South Fork of the Middle Fork of the Tule is also known as the “Nelson Fork.” This fork originates in lush alpine meadows near the Western Divide at the top of what is now known as the Belknap Complex Grove (a combination of the Wheel Meadow, Belknap, and McIntyre Sequoia Groves). From its headwaters, this Fork of the Tule is within the Slate Mountain Roadless Area in the Giant Sequoia National Monument. This rugged and diverse Roadless Area is managed as a Botanical Area. A hiking and riding trail follows the river through spectacular scenery including the pristine groves featuring ancient sequoias thousands of years old, spotted owl and fisher habitat, and native trout fisheries. After passing near the small community of Camp Nelson, it continues tumbling downstream with beautiful waterfalls and white boulders cascading between the Moses Roadless Area and the Black Mountain Roadless Area where it flows at the base of the Black Mountain Grove. As it descends, it flows through spectacular chaparral with old growth Manzanita, Fremontia, buckeye, and live oak. High to the north above its course, it is paralleled by State Highway 190. Several trails provide access for fishing and enjoyment of the river.

The South Fork of the Tule River

The South Fork of the Tule River is almost entirely contained within the Tule River Indian Reservation. Its watershed also contains giant sequoia groves, including portions of the Black Mountain, Red Hill, and Peyrone Groves, however no specific information is available about its attributes.

We urge you to take the time to carefully evaluate this special river and to do the research needed to document its many unique attributes. In our opinion, most sections and forks of the Tule River on Forest Service lands are uniquely qualified for inclusion in the National Wild and Scenic River System.

Thank you for the opportunity to comment. We look forward to your inventory and evaluation of this special river system.

Sincerely,

Carla Cloer
President, Tule River Conservancy