

STEWARDS OF THE SEQUOIA

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August 25, 2016

Mike Dietl, Regional Planning Team
US Forest Service
1323 Club Drive, Vallejo, CA 94592
Via Email- R5planrevision@fs.fed.us

Re: Comment on Sequoia, Sierra, Inyo DEIS/DRLMP

This comment letter is provided by Stewards of the Sequoia in order to help the Forest Service improve the Sequoia, Inyo, Sierra Forest Plans.

It is cosigned by 51 organizations, businesses and elected officials, representing a very wide spectrum of forest interests, who agree with these comments, and are concerned about the future of multiple use recreation on National Forest lands.

Sincerely,

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Division of CTUC 501c3 non profit
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"Since being founded in 2004, Stewards of the Sequoia continues to be the largest on-the-ground organization of volunteers in the Sequoia National Forest. Our crews have maintained over 3000 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 2500 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"

Promoting Responsible Recreation & Environmental Stewardship

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Overview

We are greatly concerned about the negative effects the current Draft Environmental Impact Statement (DEIS) for the Sequoia, Inyo, Sierra Forest Plan and associated Draft Resource Land Management Plans (DRLMP) will have on many forms of recreation, rural economies and the environment.

We had hoped the Forest Plan DEIS and DRLMP would provide desired conditions to preserve existing multiple use recreation, and perhaps even set the stage for increased multiple use recreation opportunity on which our rural forest gateway communities like Kern River Valley depend for social and economic survival.

The Forest Service DEIS correctly identifies the need for increased recreation opportunities for a growing population, but then does little or nothing to plan for that. Instead the details of the DEIS and DRLMP seeks to reduce recreation opportunity.

For example, the Forest Plan DRLMP's have totally omitted many forms of recreation such as mountain biking, horseback riding, boating, fishing, hunting, downhill skiing, and rock hounding from many if not

all the Desired Conditions for Recreation Places. As a result those forms of recreation would no longer be a priority for management or recreation opportunities.

The current Sequoia Forest Plan¹ and other existing Forest Plans have identified "the best way to meet the needs of American people is the Net Public Benefit (NPB)", but the DEIS/DRLMP does not mention or analyze this. Some of our comments apply the NPB concept. The EIS/LRMP must also carry forward this current Forest Plan concept.

The DRLMP has also omitted off road recreation from three of the seven Recreation Place's "Desired Conditions", areas where popular motorized trails currently exist in Sequoia.

In many cases the DRLMP has characterized these existing World Class Motorized Trails as "limited". The Forest Service has not characterized any other form of recreation as "limited". In so doing the Forest Service has marginalize off road motorized recreation, even though it is a key aspect of year round recreation and tourism.

While marginalizing multiple use recreation, the Forest Service has chosen to focus considerable time and resources on recommended wilderness and changes to Pacific Crest Trail management, both of which would further restrict or prohibit existing multiple use recreation.

The DEIS and DRLMP could plan for a better future for recreation on National Forest Lands. Instead the DEIS and DRLMP seems intent on limiting recreation, thereby setting the stage to negatively impact the residents and visitors to Kern, Tulare, Fresno and other counties.

The DEIS cites county economic numbers for tourism and jobs related to the National Forests, such as 3.9% of Kern County jobs are related to the Sequoia National Forest. The DEIS fails to acknowledge that Sequoia gateway communities, such as those around Lake Isabella, are almost completely dependent (perhaps 90%) on National Forest jobs and tourism. That closing routes and camping areas are detrimental to rural communities (*Hurniston et al 2010*).

In regards to the DEIS Environmental Justice issue, the communities surrounding Lake Isabella are in large part a low income population, with median household income of just \$22,500 and with 22% living below the poverty level (DEIS Vol 1 Table 156). Many low income residents enjoy multiple use recreation in the nearby Piute Mountains, which the DEIS seeks to reduce by creating a PCT Corridor which will harm the ability of low income populations to enjoy motorized or mechanized recreation.

This means rural Gateway communities like those around Lake Isabella are vulnerable populations, however the DEIS has not examined the impacts of the alternatives on our vulnerable community.

The vulnerable communities surrounding Lake Isabella have repeatedly expressed support for expanding multiple use opportunities and oppose new Wilderness recommendations or increased restrictions such as the PCT Corridor Management Area. More than 60 organizations including local Chambers of

¹ 1988 Sequoia National Forest Land Resource Management Plan

Commerce, property owners, businesses and , legislators cosigned the Stewards of the Sequoia comment letter along those lines².

Which is why it is so important that no forms of recreation be reduced or marginalized, as the DEIS and DRLMP seeks to do by restricting multiple use in favor of creating PCT and Wilderness based restrictions.

Considering the DEIS states there would be no increase or decrease in PCT usage as a result of establishing a new PCT Corridor or Management Area, there is no compelling reason to implement it (Council on Environmental Quality 1997).

Forest Planning Job One

The public reasonably assumes Job One for Forest Service management and planning is to ensure all forms of existing recreation opportunities are preserved, including off road and mountain bike recreation. There also is a foundational assumption by the public that Forest Service planning will result in keep existing public access, trails and roads open without involvement by the public.

Most people are not interested or even able to attend planning meetings, read thousand plus page plans or submitting written comments. Few people know how to draft a substantive comment that would address planning components anyway. They are not professional planners. They have their jobs and their families and their recreation. They reasonably expect the Forest Service to ensure plans protect existing recreation opportunities.

The Forest Service must recognize that recreation interests are underrepresented in planning and comments.

The new Forest Planning Rule has added recreation to Forest Planning, which then requires the public to defend their form of recreation to ensure it is not being marginalized or restricted.

For motorized recreation they must also be engaged in Travel Management plans and even Timber and other management plans, as these increasingly have components which reduce recreation roads and trails even when it has been decided routes will remain open under just completed Travel Management Plans.

It is not possible for the public to have the time or desire to be engaged in planning on such a continuous and detailed basis. The result is their recreation interests are many times ignored or even subverted by myriad forest plans.

² Stewards of the Sequoia Comment Letter- Draft Wilderness Evaluation Narrative Comments 2/1/16

Stewards of the Sequoia Comment Letter- Wilderness Analysis Comment 6/9/15

Stewards of the Sequoia Comment Letter- Forest Plan Revision Comment for Sequoia, Sierra and Inyo 9/29/2014

Stewards of the Sequoia Comment Letter- Comment on LRMP Revision Need For Change 1/24/2014

The increasing trend by the Forest Service towards plans driven by greater public input has resulted in plans driven by special interests groups with full time staff. The Forest Service needs to recognize that they are catering to these environmental groups, and allowing plans to be unduly influenced by the better funded groups who do not represent the general public .

The answer is the Forest Service needs to get back to Job One by drafting plans that propose preserving existing recreation opportunity without any need for the public to lobby for it.

World Class Piute Motorized Trail System

More than half the single track trails in the Sequoia, Sierra and Inyo National Forests have been closed to motorized recreation as a result of Wilderness and Monument designations. These closures and others have concentrated motorized recreation onto smaller and smaller trail systems and has resulted in the closure of the most scenic and best motorized single track trails.

Now the DEIS Forest Plan proposes to implement a Corridor and Management Plan for the PCT which would eliminate eleven existing historic motorized single track trails that are integral to the Piute Motorized Trails System OHV Emphasis Area per the current Sequoia National Forest Plan³. These closures would decimate the Piute trail system and create dead end trails, while further concentrating use and needlessly increasing environmental impacts. Yet the very same DEIS recognizes the need to develop more trail systems for a growing population.

As small as it is, the World Class Piute Motorized Trail System is the largest remaining single track motorized trail system in California, and the only contiguous single track motorized trail system where a rider can stay exclusively on single track all day without riding any trail twice or getting on a road. That makes the Sequoia Piute Trail System an extremely rare and valuable motorized recreation opportunity for local residents and as destination recreation experience.

The Forest Service Travel Management Rule requires the Forest Service to inventory, analyze all existing trails including non system trails in order to determine if they should become designated trails. The Sequoia Piute Travel Management Plan has been in process for 11 years. In 2008 the Travel Management process for the Piute area was temperately placed on hold to give the area time to recover from damage caused by the 2008 Piute Fire. The Piute Travel Management NEPA process was resumed in 2010 with the help of an \$189,000 OHVRD planning grant, a facilitator and series of public meetings.

The 2010 resumption of Piute Travel Management planning resulted in a proposed action, the Piute Mountain Travel Management Plan (2/11/2011) The Forest Service made a commitment to the public as part of that process that all inventoried Piute Trails, including non system trails would be analyzed and considered for designation as official Forest Service Trails.

The Forest Service is in process of doing this in the Piute Travel Plan, but removed the Piute Trails from analysis to focus on the Forest Plan Revision. The Forest Service has not completed the required Travel

³ 1988 Sequoia National Forest Land Resource Management Plan OHV Emphasis Map

Management Process, so they have not determined which Piute trails may be closed and which remain open.

This needs to be considered and analyzed in the EIS, especially in relation to not allowing any of the Piute non system trails to be closed until the Piute Travel Management Process is completed.

Comments Not Addressed

The 2012 Forest Planning Rule and the Sequoia National Forest Plan Revision Communication Collaboration Plan March 13, 2013 requires that public comment be addressed in the Forest Plan Revision.

The Forest Service PCT In Brief 11/17/14 noted the public had submitted comments objecting to the PCT in the Proposed Action for this Forest Plan, and the DEIS states, *“The public generally agreed with the proposed action except for the following issues related to it:” (DEIS Vol 1 Page 14).*

Yet the PCT is not included in that list of issues the public objected to, even though Stewards of the Sequoia and others have submitted numerous objections letters⁴. Nor does the DEIS cite a “need for change” to justify the PCT related Forest Plan changes.

Many of our comments which include a need for change justification that we identified, do not seem to have been addressed or considered in the Alternatives.

The Alternatives do contain the opposite of our comments (for example the DEIS proposes more recommended Wilderness when we have proposed a reduction), which demonstrates that the nature of our comments do fall within the scope of the Forest Plan.

The DEIS has therefore failed to meet the 2012 Forest Plan guideline.

The EIS must be updated to include Alternatives which address our prior comments, proposals and needs for change such as minor Wilderness boundary adjustments, as well as our comments in this and prior comment letters.

⁴ Some PCT Corridor Objection Letters-

Stewards 9/29/14 Forest Plan Revision Comment for Sequoia, Sierra and Inyo

Stewards 11/5/15 Concerns with Changes to PCT Management in Forest Plan Revision

Kernville Chamber of Commerce 3/20/15 PCT Proposal Objections

Lake Isabella KOA 2/1/15 PCT Corridor Objections

Lake Isabella Bodfish Property Owners Assoc 1/28/15 Sequoia Forest Plan Comment

United Trail Maintainers of California 1/20/15 Forest Plan Revision - PCT Proposal objections

Compliance and Consistency with Current Sequoia Forest Plan

ISSUE (PLAN-01)

Our understanding is the Forest Plan Revision is not a new Forest Plan, but a revision of current forest plans. Forest Staff have stated the Forest Plan Revision EIS would not start from scratch. It would not analyze all forest issues, but only those that are determined to need to be changed. That being the case we were surprised the DEIS does not start with the current forest plan document and update it. Instead the DEIS is a completely new plan which does not carry forward many pertinent decisions regarding management direction of the current forest plan.

For example the current Sequoia Forest Plan Management Direction⁵ includes a number of things which the DEIS does not acknowledge or address such as:

- *"MANAGEMENT DIRECTION- OHV's (including mountain bikes) are a legitimate use of Forest Lands"* (Sequoia LRMP 4-18)
- *"The Forest will increase opportunities for OHV vehicles through development of OHV trail facilities."* (Sequoia LRMP 4-18)
- *In response to public comments OHV trail construction would be increased and 21 miles of new OHV trails would be built each decade since 1988, and that this would be "inadequate to meet future demands".* (Sequoia 1988 LRMP ROD Page 17). The Sequoia FLRMP must address how this has been done, or if it has not been done the effects, and how it should be addressed in future considering the actual increased need for OHV trails now and during the life of the plan.
- *"Off highway vehicle routes will provide a network of loop trails while the Forest trail system, with some increases in mileage, will appear maintained consistent with the individual trail classification."* (Sequoia LRMP 4-8)
- *"TRAILS"*
 - *"Allow changes and increases to the existing trail system on the Forest {new trail construction). "*
 - *"Develop and maintain a trail/transportation system that emphasizes loop trails."*
 - *"Enhance present opportunities by emphasizing management actions which will link campground and other sites to existing trails, tie trails together to create loops and multi-day opportunities, and resolve user conflicts (through designation or design to serve the needs of different trail users)."* (Sequoia LRMP 4-23)

⁵ 1988 Sequoia National Forest Land Resource Management Plan Chapter 4

- Dispersed and Developed Recreation ROS capacity guidelines including PAOT/ACRE analysis for each Management Areas (*Sequoia LRMP 4-42 to 4-92*)
- *"Relocate system trails out of meadows where unacceptable damage is occurring."* (Sequoia LRMP 4-24)
- *"The popularity of dispersed land recreation will continue to grow. Demand for recreation opportunities on dispersed areas can be met throughout the planning period, although certain ROS classes will be used almost to capacity by the year 2030."* (Sequoia LRMP 3-45)
"Approximately 36 percent of the RVD's occurred in developed sites and 64 percent in dispersed areas (4 percent of which were in designated wildernesses)." (Sequoia LRMP 3-42) The EIS needs to include these numbers for current recreation. The DEIS/LRMP needs to state what the usage levels are now and analyze this in order to make an informed decision and to be consistent with the existing Sequoia Forest Plan.
- *"There is increasing use and demand for dispersed motorized activities on the Sequoia NF."* (Sequoia LRMP 3-45)
- *"Consistent with the Forest Plan, identify {in cooperation with the state, other agencies and user groups) opportunities to develop segments of trail that support the concept of a statewide (OHV) trail system. An objective of this system is to connect use areas and provide opportunities for long distance (OHV) trail touring."* (Sequoia LRMP 4-20)
- The 1988 Sequoia LRMP "Demand for Recreation" section has been deleted from the DEIS/DRLMP, yet this information is crucial for recreation managers and responsible officials to make informed decisions, such as what needs to be included or removed from the preferred Alternative.

(The above is only a partial listing of the many sections of the current Sequoia LRMP Management Direction and analysis that are still pertinent and need to be brought forward to the Forest Plan revision FEIS/FLRMP.)

OUTCOME (PLAN-01)

The above 1988 Sequoia Management Directions and analysis methods are still valid, and are *"a cohesive and compatible set of practices and activities selected and scheduled for application on a specific area of land, the Management Area, to attain desired goals and objectives"*⁶.

1. As current *"practices and activities selected and scheduled for application"*⁷, the current Sequoia Management Direction and analysis must be addressed in the EIS for continuity and effects.

⁶ 1988 Sequoia National Forest Land Resource Management Plan 4-41

⁷ 1988 Sequoia National Forest Land Resource Management Plan 4-41

2. Current Sequoia Forest Plan Management Direction addresses issues like providing more motorized and other issues, which are even more pertinent today than in 1988. Likewise the current Sequoia Forest Plan Management Direction and analysis information is crucial to making informed decisions and must be brought forward in the FEIS/FLRMP in order to protect the resource and provide sustainable recreation.
3. During the planning process the Forest Service has not identified any need for change of these Management Directions or any environmental analysis that would justify removing them from the EIS/LRMP, or eliminate their analysis.
4. Prior scoping comments provided by Stewards of the Sequoia and others support the need for this type of Management Direction and analysis in the EIS.
5. The Dispersed and Developed Recreation ROS capacity guidelines including PAOT/ACRE analysis in the 1988 Sequoia LRMP is most useful for informed management decisions. This needs to be included in the FEIS/FLRMP.
6. Driving for pleasure, the fifth most popular form of recreation⁸ is listed as an emphasis in the 1988 Sequoia LRMP Management Directions. It is somehow omitted from the DEIS Recreation Places. This must be corrected in each of the three forest FLRMP's.
7. The 1988 Sequoia LRMP states 2.5 million visitors per year. It seems likely that Sequoia National Forest visitation has increased since 1988, but we are told the (x) for visitor numbers in the DLRMP should read 1 million visitors (DEIS Vol 1 Page 42). This cannot be possible based on the 1988 Sequoia LRMP 2.5 million visitors. What is the correct number?

Tiering of Planning

ISSUE (TIER-01)

Stewards of the Sequoia have questioned the validity of changing or amending the specific "1982 PCT Comprehensive Management Plan" through the programmatic Forest Plan Revision.

On August 3rd, Forest Staff explained at a public meeting the reason PCT Management can be changed in the Sequoia/Sierra/Inyo Nation Forest Plan Revision by the creation of new PCT Corridor Management Area without amending the 1982 PCT Comprehensive Management Plan, is that the Forest Plan is tiered to the "1982 PCT Comprehensive Management Plan".

It is certainly true that Forest Planning regulations incorporate tiering, however forest plan tiering should flow from a broad program plan document, giving direction to create a narrow specific plan document, giving direction to create an even narrower supplemental document (CFR1508.28).

⁸ USDA Sequoia National Forest NVUM 2011, June 20, 2012

If there were no existing PCT Comprehensive Management Plan, then the broad Forest Plan could propose the creation of that narrow specific PCT Management Plan. However there already is a narrow "1982 PCT Comprehensive Management Plan".

Therefore the broad 30,000 foot Forest Plan cannot tier to change the direction contained in the specific "1982 PCT Comprehensive Management Plan" as the Forest Service is currently proposing to do by creating a new PCT Corridor and Management Area. It become as case of the tail wagging the dog.

OUTCOME (TIER-01)

That being the case the PCT Corridor and Management Area and any other changes to PCT related management must be removed from the EIS. In order to properly tier, the Forest Service will need to do an amendment to the "1982 PCT Comprehensive Management Plan" for the proposed PCT Corridor and PCT Management area or any other PCT related changes.

Discrimination and Subverting ROS Land Designations

ISSUE (S-ROS-01)

The creation of a PCT Corridor would discriminate against motorized recreation by prohibiting or restricting motorized use on USFS lands designated for motorized recreation as Semi Primitive Motorized ROS and Roded Natural ROS.

A PCT Corridor would further restrict or prohibit motorized use contrary to both Semi Primitive Motorized (SPM) and Roded Natural (RN) areas where motorized use is allowed.

The PCT Corridor is not in keeping with SPM or RN ROS lands.

Where the PCT Corridor allows designated USFS trails and roads, they are cherry stemmed just like in a Wilderness Area. However a Wilderness Area is Primitive ROS which allows the cherry stemmed motorized use. Not a motorized ROS that is prohibiting motorized use except for a cherry stem.

In the case of an SPM or RN ROS area the Forest Service cannot cherry stem motorized use, since both SPM and RN are motorized areas. Therefore the creation of a PCT Corridor in these areas would be subverting the ROS land designation by prohibiting the very motorized use the areas are intended for under SPM or RN.

The DEIS seeks to create a PCT Corridor with drastic restrictions on motorized recreation. Yet both SPM and RN are to be managed with a minimum of subtle restrictions (DEIS Vol 1Page 649). The virtual prohibition of new or historic motorized routes within he PCT Corridor ad cherry stemming routes is not a subtle restriction. Therefore the PCT Corridor must be removed from all SPM and RN areas.

Also the PCT Corridor seeks to reduce or eliminate motorized users contrary to SPM condition. Likewise the PCT Corridor seeks to reduce or eliminate motorized users contrary to RN conditions, where

motorized users will be prevalent and there will be moderate evidence of the sights and sounds of other humans.

The PCT Corridor and Management Area based restrictions are not in compliance with the underlying SPM and RN ROS conditions. The PCT Corridor conditions are in keeping with Primitive ROS.

The "*The Pacific Crest Trail Comprehensive Management Plan allows for the full range of the recreation opportunity spectrum to be experienced*" (DEIS Vol 1 Page 544). These include SPM, RN, Rural and Urban ROS, which are not suitable for a PCT Corridor. This further reinforces that the Pacific Trail Comprehensive Management Plan does not allow or intend a PCT Corridor.

OUTCOME (S-ROS-01)

The EIS could keep the PCT Corridor and Management Area in areas that are currently Primitive ROS and eliminate them from areas that are not Primitive ROS.

Inconsistency

ISSUE (INC-01)

The 1982 Comprehensive Management Plan covers the entire 2650 miles of the PCT stretching across 25 National Forests. Changing PCT Management in just three Forest Plans would lead to inconsistent management of the trail as it would not apply to other Forests, private lands or other public lands. Far better to manage the PCT more consistently under its own existing plan for all lands and forests.

The USDA Forest Plan seeks to provide **consistent** management direction across the three national forests (DEIS Vol 1 Page 6).

Yet the creation of a PCT Corridor subverting the underlying SPM and RN as this DEIS does, would be inconsistent with the ROS and therefore contrary to the intent of the Forest Plan.

Designating simple classifications such as the Recreation Opportunity Spectrum (ROS) provides consistent management direction.

However developing classifications such as the PCT Corridor which require numerous exemptions such as allowing designated motorized trails and variable widths is not a consistent management direction.

*"The emphasis of the current plans is on improving recreation opportunities by focusing on the maintenance, development, adaptation, or alteration of dispersed and developed recreation sites **consistent** with the recreation opportunity spectrum class of the area". (DEIS Vol 1 Page 24)*

Just as "*This forest plan revision effort provides an opportunity to coordinate the development of the three forest plans and strategically define what management direction should be consistent across the three national forests*" (DIES Vol 1 Page 6), so too the 1982 PCT Comprehensive Management Plan seeks

for consistent management along the entire length of the 2650 mile PCT Trail. Therefore changes to PCT management such as the three forest PCT Corridor would be inappropriate as it would lead to inconsistent management of the PCT through myriad changes in many Forest Service Plans and other agency plans.

OUTCOME (INC-01)

We would point out that the development of a PCT Corridor and Management Area that is not consistent with the underlying ROS would degrade the recreation opportunity. This would be contrary to the intent of the Forest Plan. The FEIS must analyze and consider this.

ISSUE (INC-02)

The DEIS PCT Corridor is described as being up to a certain distance from the center of the trail. This unknown variability of the PCT Corridor would make management extremely difficult and be inconsistent, contrary to the intent of the Forest Plan to provide consistent management.

Additionally the maps depicting the varying width PCT Corridor/Management Area contain in the DEIS are beyond the scope of the DEIS, as determining the specific location of a varying corridor boundary would itself require a separate EIS. The impacts of the variable width Corridor cannot be known until the width is selected.

OUTCOME (INC-02)

If the EIS continues with the variable PCT Corridor then the FEIS must disclose and determine what will cause this variability in PCT Corridor width in order for the responsible official to understand the impacts in order to make an informed decision.

Paraphrasing

The Forest Plan must manage the PCT according to the "1982 PCT Comprehensive Management Plan". In order to avoid confusion and ensure meeting the intent of the 1982 PCT Plan, the EIS must include the actual text from the "1982 PCT Comprehensive Management Plan" instead of paraphrase or rewriting it as below.

"Management of the Pacific Crest Trail is designed to harmonize with and complement established multiple-use plans to ensure continued benefits from the lands. Managers protect the integrity of the trail by avoidance, mitigation, and modifying management practices as needed". (DEIS Vol 1 Page 536)

Recommended Wilderness

ISSUE (RW-00)

Environmental Impacts Statements (EIS) by their very nature require the disclosure of the environmental impacts of proposed management decisions or lack of management. The Forest Service has broadened the scope of the Forest Plan EIS to include social and economic, as well as environmental conditions and recreation.

OUTCOME (RW-00)

Yet the DEIS does not disclose the impacts for Wilderness Recommendations such as increased environmental impacts of concentrating non-wilderness recreationists onto smaller multiple use lands, or the reduction in tourism by reducing multiple use opportunity, or the reduction in multiple use volunteerism (by far the largest form of volunteerism) due to reduction in multiple use opportunity.

The FEIS must disclose and consider this.

ISSUE (RW-01)

There is no mention in the DEIS about the proposals Stewards submitted to recommend minor Wilderness Boundary Adjustments of roughly 2500 acres in order to restore 70 miles of loop trails⁹.

OUTCOME (RW-01)

These minor Wilderness Boundary Adjustments would help the Forest Service meet a number of desired goals, such as enhance existing recreation, increase multiple use volunteerism, reduce impacts and provide more trails for a growing population. The FEIS should analyze and consider them.

ISSUE (RW-02)

All Alternatives seek to

"recognizes the importance of partnerships and encourages more partnerships to support recreation opportunities"

However the majority of volunteer work and the largest partnerships are on multiple use lands, as the DEIS confirms, and explained further in this comment letter.

⁹ Stewards comment letter 7/13/15 Wilderness Evaluation boundary adjustment recommendations

It must be recognized that removing multiple use lands through Wilderness Recommendation will harm existing volunteerism and partnerships, and harm the ability for the Forest Service to "*maintain and increase partnerships and volunteerism*", as desired. (DEIS Vol I Page 18)

Some of the most active groups who maintain Wilderness trails such as the Untied Trail Maintainers of California¹⁰ and the Backcountry Horseman have stated there are already more Wilderness trails than can be maintained.

The DEIS statements that recommending more wilderness will increase volunteerism are totally incorrect. The already over extended wilderness volunteerism cannot be increased by more wilderness lands. If anything more wilderness may discourage existing overwhelmed wilderness volunteerism.

OUTCOME (RW-02)

The FEIS must consider and acknowledge that adding recommended wilderness will increase the deferred maintenance backlog and reduce sustainability, contrary to stated Forest Plan desired conditions. The sections of the EIS that state adding wilderness will increase volunteerism must be removed.

ISSUE (RW-03)

The DEIS states-

"The 2012 Planning Rule emphasizes that forest plans are to guide management of the national forests so they are ecologically sustainable and contribute to social and economic sustainability."(DEIS Vol I Page 4)

Yet the recommendation of Wilderness Areas will be contrary to these goals.

OUTCOME (RW-03)

1. The FEIS must disclose and consider that converting or removing multiple use lands to recommend wilderness will concentrating use, shrink the future reservoir of lands for multiple use, increase environmental impacts and reduce user satisfaction. That multiple use lands are where the majority of the public recreate.
2. The continued chipping away at multiple use lands will reduce the capacity of the land to handle future generations of recreation violating the intent of the Planning Rule for sustainability.
3. That concentrating use will reduce user satisfaction and harm tourism, upon which rural communities like the Kern River Valley depend. Recreation to them and other planning area rural communities, is not simply an activity done for enjoyment when one is not working.

¹⁰ UTMA 2/4/16 Draft Wilderness Evaluation Narrative Comments

Recreation to them is their last hope for preserving what is left of their economy. Year round motorized and mountain bike recreation are the primary parts of the Kern Valley economy.

ISSUE (RW-04)

The DEIS discloses that the Kaiser Wilderness was designated since the creation of the Sierra Forest Plan-

"For the Sierra National Forest, new plan components (desired conditions and standards) apply to the Kaiser Wilderness. This direction did not previously exist in the 1992 plan; however, this direction reflects how the Sierra National Forest has been managing the Kaiser Wilderness for several years." (DEIS Vol I Page 18)

However the DEIS fails to do the same regarding the Kiavah Wilderness in the Sequoia National Forest, which was also designated in 1994 after the current Sequoia Plan¹¹.

OUTCOME (RW-04)

The FEIS needs to state the following-

For the Sequoia National Forest, new plan components (desired conditions and standards) apply to the Kiavah Wilderness. This direction does not exist in the current Sequoia Forest Plan¹²; however, this direction reflects how the Sequoia National Forest has been managing the Kiavah Wilderness for several years.

As discussed in another section of this letter converting the current SPM ROS in the Kiavah to Primitive needs to be addressed by converting other lands to SPM in order to keep the ROS in balance.

ISSUE (RW-05)

The DEIS changes the ROS for the Kiavah Wilderness and other areas along the Kern River to non motorized such as in Alt C, but the DEIS does not resolve inconsistencies in the ROS to match existing motorized trails in the Sirretta Peak and Piute areas.

Instead the DEIS Sequoia Page 135 states the ROS inconsistencies for Sirretta Peak and Piute areas "may" be addressed in a separate EIS in future.

¹¹ 1988 Sequoia National Forest Land Resource Management Plan

¹² 1988 Sequoia National Forest Land Resource Management Plan

OUTCOME (RW-05)

The Forest Plan is required to address the ROS and correct ROS inconsistencies. (FSM 1926.15)

The FEIS must correct ROS inconsistencies for Sirretta Peak and Piute areas, just as it is doing for the Kiavah Wilderness.

ISSUE (RW-06)

We support the Forest Plan where it seeks to "Develop landscape scale projects to increase the pace and scale of ecological restoration, ecosystem resilience and fire resilience, and to protect the carbon carrying capacity of the forest. (DEIS Vol I Page 70)

OUTCOME (RW-06)

However the EIS must recognize that the recommendation of Wilderness would prevent or restrict the Forest Service from achieving that goal by designating more lands for non management. That Wilderness lands will decrease the pace and scale of ecological restoration, ecosystem resilience and fire resilience, and to protect the carbon carrying capacity of the forest

ISSUE (RW-07)

We appreciate that the Native American Tribes also object to more Wilderness and feel that Wilderness would adversely affect Native American Cultural Sites. That Wilderness designation would harm the ability of Native Americans to visit the Cultural Sites and be harmful to Cultural Sites by prohibiting management that has been done historically by Native Americans

The DEIS section on Tribal Relations and Uses somewhat discloses the above Tribal concerns (DEIS Vol 1 pages 560), although the DEIS seems to downplay them by merely saying that Wilderness may impact Cultural Sites (DEIS Vol 1 pages 554). More importantly the DEIS Wilderness and Cultural sections contain no mention of the Tribal position that Wilderness would adversely affect Cultural Sites and that Wilderness is anathema to them. Instead the DEIS Cultural section mistakenly states that Wilderness has only positive effects (DEIS Vol 1 pages 510), and makes no mention of any possible negative effects to cultural resources.

OUTCOME (RW-07)

The Tribal perspective of adverse effects of Wilderness has significant bearing and must be fully disclosed not only in the Tribal Relations section of the FEIS, but also in Cultural and Wilderness FEIS

sections - *Environmental Consequences to Heritage Resources* and the associated *Consequences Common to All Alternatives* and *Consequences for Each Alternative* (DEIS Vol 1 pages 508-511), and the general EIS Wilderness section (DEIS Vol 1 pages 512-524), as well as the Cultural and Wilderness section of each of the separate Sequoia FEIS and Inyo FEIS and Sierra FEIS.

The FEIS must acknowledge the possible negative affects to cultural resources of recommended wilderness.

This will allow the responsible official to fully consider the adverse impacts of Wilderness, which could lead to less Wilderness being recommended in the FEIS and ROD.

ISSUE (RW-08)

The Forest Service had 2010 as the target date for completion dates for Travel Management. It is clear the Forest Service intended to complete Travel Management under the 2005 Travel Management Planning Rule prior to undertaking Forest Plan Revision.

This makes sense on many levels including avoiding conflicts in planning, such as are being experienced in the DEIS with the PCT Corridor subverting the ability of the in process Piute Travel Management Plan to analyze and consider existing non system trails as required under the 2005 Travel Management Planning Rule.

OUTCOME (RW-08)

The PCT Corridor and Wilderness evaluation are new issues brought up after 2005 Travel Management Planning Rule. They must not be allowed to subvert the implementation of the 2005 Rule or in process planning such as the Piute Travel Management Plan.

Likewise “in process” plans under the 2005 Travel Management Planning Rule must be completed prior to implementing the subsequent 2012 Forest Planning Rule.

Recreation Opportunity Spectrum

ISSUE (ROS-01)

On 8/1/16 the Forest Service discovered that all acreages in Table 106 DEIS Recreation Opportunity Spectrum (ROS) are significantly in error¹³. The ROS acreage is intrinsic to many aspects of Forest Planning, so this has serious implications to the EIS.

¹³ Email Forest Service Natural Resources Specialist Planner Mary Lou Fairweather 8/1/16 DEIS Questions

The error appears to have over represented motorized opportunity by 30% or 327,769 acres in the Sequoia National Forest. This appears to be due to including the Sequoia Monument acreage, however the Sequoia Monument has a separate Plan and is excluded from the three Forest Plan DEIS.

It is unlikely the general public have discovered the ROS error, which prevents the public from correctly analyzing the DEIS and makes it impossible for the public to make valid comments. The ROS acres are integral to the DEIS analysis and conclusions in many sections.

For example due to the acreage error the DEIS Consequence Sections for all Alternatives which cite acreage percentages and related conclusions are also in error, since they are based on the incorrect Table 106 ROS acreage numbers.

Also all other sections relating to ROS would likely lead to false analysis and conclusions in relation to the incorrect total ROS acreages such as the PCT Environmental Consequences -*Recreation Opportunity* (MA-PCTW-DC-02 and MA-PCT-DC-03).

OUTCOME (ROS-01)

Overall this means Forest Staff will not have accurate public comments upon which to base the draft a valid FEIS. This makes it impossible for the responsible official to make a valid decision since the FEIS will not be based on accurate comments or analysis.

Even if the Forest Service corrects the ROS acreages and the consequences in the FEIS, the public will not be able to submit comments to the Forest Service regarding the impacts of the corrected ROS and consequences, since there is no public comment on the FEIS only objections. Therefore the public will only be able to file an Objection as that is the only option once the FEIS is released.

Likewise merely providing ROS corrections in the FEIS would violate NEPA by not providing best available data or even correct data during the draft phase for the public to comment on and for staff to base the FEIS on.

The ROS error may be limited to the Sequoia Forest ROS, in which case a Sequoia SEIS with corrected ROS acreages could be drafted and released with an associated public comment period in order to allow the Forest Service to receive input on the corrected ROS data and associated impacts prior to drafting the Sequoia FEIS.

ISSUE (ROS-02)

The DEIS does not contain ROS maps showing the acreage of each discrete ROS areas within the Sequoia. For example acreages of each discrete SPM area.

This is especially crucial considering the current 30% ROS acreage error in the DEIS. Without this information the public cannot verify the ROS.

We are concerned that the ROS areas may not be represented correctly, but without a more detailed map showing the underlying route road/trail detail, and ROS areas with acreage, it is impossible for the public to make comments or verify if the DEIS ROS numbers and conclusions are correct.

In other words high resolution maps with discrete acreage for each contiguous area of sub ROS with underlying route road/trail detail. For example there would be acreages in each of the many SPM areas and likewise for each contiguous area of SPM, and so on for each ROS and a map for each alternative.

This would seem especially appropriate to provide to the public considering the DEIS numbers in Table 106 have been determined to be incorrect.

OUTCOME (ROS-02)

Since the public was not provided with this information it is not possible to comment accurately about the ROS area or inconsistencies.

Overall this means Forest Staff will not have accurate public comments upon which to base the draft a valid FEIS. This makes it impossible for the responsible official to make a valid decision since the FEIS will not be based on accurate comments or analysis.

The Forest Service should provide this ROS map in a Sequoia SEIS with discrete ROS acreages in each of the many sub ROS areas

ISSUE (ROS-03)

The DEIS Map 46 Recreation Opportunity Spectrum (ROS) Sequoia National Forest Alternative A incorrectly shows the 43,803 acre Forest Service portion of the Kiavah Wilderness as "**Primitive (nonmotorized)**" designation. As far as we are aware the Forest Service never amended the 1988 Sequoia Forest Plan which designated that area as "**semi primitive motorized**" ROS.

In the interim the area was designated by Congress as Wilderness in 1994, but that designation did not change the Forest Service ROS, so the area is still "**semi primitive motorized**". This should be addressed in the Sequoia Forest Plan Revision now and will result in a loss of 43,803 acres of "**semi primitive motorized**" recreation opportunity at a time when the need for more motorized recreation is increasing.

The current Sequoia¹⁴ Forest Plan determined the total acreage of "semi primitive motorized" areas that were needed. In the meantime demand for motorized recreation has increased dramatically, and will continue to increase as population grows (DEIS Vol I page 398).

¹⁴ 1988 Sequoia National Forest Land Resource Management Plan

The Forest Plan must recognize the increased need for motorized recreation opportunity and rebalance the ROS to at the very least maintain the existing Forest Plan acreage of "semi primitive motorized" recreation.

Additionally, recreation demand and public preferences including motorized recreation must be part of the Forest Plan (FSM 1909.12 23.23a).

Yet the DRAFT Sequoia Forest Plan fails to increase or maintain motorized opportunity compared to the existing Sequoia 1988 LRMP levels in any Alternative. Instead the Forest Plan proposes to reduce motorized recreation opportunity by up to 18% (DEIS Vol 1 Page 490). Perhaps by more, depending on the corrected ROS numbers.

The Forest Plan has not justified the proposed loss of 43,803 acres (Kiavah Wilderness) of "semi primitive motorized" recreation ROS.

A Need to Change the ROS was identified by Stewards of the Sequoia to maintain the existing total acreage of "semi primitive motorized" recreation. In order to meet the sustainability mandate the EIS must consider this need for maintaining and increasing motorized recreation opportunity now.

Stewards submitted documentation regarding the need to rebalance the ROS in order to address inconsistencies and changes in land management since the creation of the 1988 Sequoia Forest Plan.¹⁵

The DEIS proposes to change the ROS for the Kiavah Wilderness and other areas along the Kern River to non motorized such as in Alt C. However the DEIS does not resolve inconsistencies in the ROS to match existing motorized trails in the Sirretta Peak and Piute area.

Instead the DEIS Sequoia Page 135 says the Sirretta Peak and Piute area "may" be addressed in a separate EIS in future. Since the Forest Plan is required to update the ROS and correct inconsistencies the Sirretta Peak and Piute area ROS must be updated in this EIS to reflect existing motorized trails and the need for the ROS to match that. It is especially important this be done in light of the huge loss of motorized ROS due to the Kiavah Wilderness designation.

OUTCOME (ROS-03)

The Forest Plan FEIS must include the new plan components (desired conditions and standards) as they apply to the Kiavah Wilderness and other Sequoia National Forest Lands due to those new plan components, such as the huge loss of semi primitive motorized ROS opportunity due wilderness designation.

¹⁵ Stewards comment letter 9/29/14 Forest Plan Revision Scoping Comment for Sequoia, Sierra and Inyo
Stewards comment letter 11/5/15 Concerns with Changes to PCT Management in Forest Plan Revision
Stewards comment letter 7/13/15 Wilderness Evaluation boundary adjustment recommendations
Stewards comment letter 6/9/15 Wilderness Analysis Comment
Stewards comment letter 2/1/16 Draft Wilderness Evaluation Narrative Comments

The Sierra Nevada Plan Amendment stated the Forest Service would track any loss of OHV opportunity in the Sequoia National Forest and provide a "compensation credit" (SNPA Page 103). The Forest Plan FEIS must recognize, disclose, analyze and consider any such loss, for example the 43,803 acre loss of semi primitive motorized ROS opportunity and address the Sirretta Peak and Piute area ROS in this EIS.

ISSUE (ROS-04)

In the DEIS Table 98. "*Overview comparing alternatives*" is misleading regarding the Recreation Opportunity Spectrum. It states "*for each Alternative the recreation opportunity is improved*", even though in Alternative C the motorized recreation spectrum is reduced and in Alternative D the nonmotorized spectrum is reduced.

OUTCOME (ROS-04)

Depending on what form of recreation a person enjoys it seem likely that any one member of the public would consider one condition to be an improvement in recreation and the other to be a negative effect.

Since the public was not provided with this information it is not possible to comment accurately about the alternatives.

As a result Forest Staff will not have accurate public comments upon which to base a valid FEIS. This makes it impossible for the responsible official to make a valid decision since the FEIS will not be based on accurate comments or analysis. This indicates the need for an SEIS.

The SEIS or FEIS must more clearly describe Alternative effects i.e. the net gain or loss of each type of recreation for each alternative including both positive and negative effects for recreation opportunity in order for the public to be able to substantively comment on the EIS.

Sustainable Recreation

We are concerned the DEIS will negatively affect the sustainability of recreation trails and harm the possibility of future projects to maintain or expand sustainable multiple use trails, especially motorized/mechanized trails.

This concern is due to the failure of the DEIS to disclose a number of facts and needs regarding the importance of motorized/mechanized recreation and the impacts of the proposed alternatives, some of which are outlined in this comment letter. This can be remedied by updating the FEIS or SEIS as we suggest in this comment letter.

Besides identifying a Need for Change the Forest Plan must identify existing strengths and how those can continue to be built upon. The Forest Service DEIS has made it clear that greater volunteerism will be needed in order to make up for shortfalls in funding. We agree.

However history has shown that nonmotorized and wilderness volunteers have been few and far between. Even with vast amounts of lands set aside exclusively for nonmotorized use, these groups make up only a very small portion of volunteer maintenance performed in Sequoia and Sierra Forest lands each year.

Regardless the Forest Service DEIS claims there will be a large increase in nonmotorized volunteerism to justify certain alternatives. We see this convenient logic as not stemming from facts or reality.

In terms of Sequoia National Forest, the greatest strengths are motorized volunteerism and motorized OHV grant funding, indicating a strong need to keep existing motorized trails and expand them. After all 180 miles, or 72% of all Sequoia trail maintenance in 2015 was done by Stewards of the Sequoia motorized volunteers.

However the Sequoia Forest Plan all but ignores this in favor of a more divisive preservation oriented nonmotorized preference, regardless of the unsustainability or lack of need for adding more non motorized lands.

Sequoia is a working man's forest, where all forms of recreation have gotten along and even work together to keep their trails open.

The Alternatives in the DEIS would not address the changing social and environmental conditions by-

- Further concentrating recreation use on shrinking multiple use lands, through additional Wilderness recommendations.
- Reducing the ability to reduce fuels, fight fires or actively manage lands to promote forest health, through additional Wilderness recommendations.
- Restricting multiple use recreation and concentrating use thus harming tourism, through the creation of a PCT Corridor and Management area.

The EIS must be updated to address the above.

The DEIS states the need to provide sustainable recreation-

"The need to provide sustainable recreation was a key topic of interest at public meetings and during public engagement. Sustainable recreation is the set of recreation settings and opportunities on National Forest System lands that are ecologically, economically, and socially sustainable for present and future generations." (DEIS Vol 1 Page 460)

The Forest Chief initiated a Strategy for Sustainable Trail Systems identifying the primary challenge facing the Forest Service. ***"We are unable to manage the current trail system we have, and the demand for more is increasing¹⁶."***

Stewards have been actively addressing this problem for more than a decade and have developed a very successful volunteer program that has provided sustainable multiple use trails in the Sequoia Forest.

One of the keys to providing a sustainable trail system is to disperse use by keeping existing trails open, not by reducing multiple use trails such as via the proposed PCT corridor or added recommended Wilderness. The key to providing a sustainable volunteer program is to provide projects to open up overgrown trails or building new trails. Volunteers are more highly motivated if the project results in increased opportunity.

The most active volunteer programs are based on motorized or mechanized recreation, since they are the fastest growing forms of recreation, and the most motivated as shown by Sequoia motorized and mechanized volunteer numbers. Motorized volunteers are vastly more efficient than foot or pack animal crews, completing far more maintenance work in less time. The FEIS needs to address this in order to actually provide the desired sustainable trail system.

Over the past five years Stewards of the Sequoia have proposed a number of trail maintenance projects that we would be willing to do. At the Sequoia National Forest Quarterly OHV Meeting 3/28/16 in Kernville the Sequoia staff and the Forest Supervisor made it clear they lack the resources to do the work required just to coordinate many of the projects with Stewards of the Sequoia. The FEIS should address this need for increased Forest administrative capacity to approve and coordinate volunteer projects.

The DEIS also states the Forest Service will be reducing recreation staff and funding over the next 15 years (DEIS Vol I Page 461), which is most surprising since the public was repeatedly assured by the Forest Service during the Sierra Cascades Dialogs that recreation was important.

ISSUE (SREC-00)

The Sequoia Access Section (DEIS Vol I Page 473) states there are 1056 miles of trails in Sequoia National Forest of which 687 miles (65%) are nonmotorized, and 370 miles (35%) are motorized. So nonmotorized recreation already has almost twice as much exclusive recreation opportunity mileage as motorized.

¹⁶ Trails Summit: *Moving Toward a Sustainable Trail System on National Forest Land*, November 19-20, 2015 Meeting Notes

However non motorized users easily get four time more recreation visitor days (RVD) from the same mileage of trails compared to motorized uses, due to non motorized users traveling far less in a day (perhaps up to 10 miles) compared to motorized (perhaps 40 miles or more)

So the current 687 miles of non motorized trails could provide more than 68 recreation visitor days, whereas the 370 miles of motorized trails would provide a mere 9 recreation visitor days or less.

OUTCOME (SREC-00)

In order to provide full disclosure and accurately reflect known conditions the EIS must be updated to note this represents an imbalance or lack of proportionate Recreation Visitor Days (RVD) where *"exclusive use trails for equestrian, hiking, and bicycling should make up a maximum of 17 percent, 15 percent and four percent of the trail system, respectively"*, indicating a need to increase the recreation visitor days for motorized use to a minimum of 64% of the trail system (Cordell et al 1999).

The EIS need to disclose the recreation visitor days for both motorized and non motorized trails and address the imbalance.

ISSUE (SREC-01)

Stewards of the Sequoia members have volunteered extensively with the Forest Service to provide a documented sustainable motorized trail system in the Piutes and elsewhere in the Sequoia National Forest. This yet to be analyzed Piute motorized trail system, comprised of both system and non system trails, contributes to local, regional, and national economies in a sustainable manner.

OUTCOME (SREC-01)

The EIS must disclose these Sequoia Piute sustainable motorized recreation opportunities and trails per the Sequoia Piute Travel Management Proposed Action, in order to enable the Responsible Official to consider this as required under FSM 1909.12 23.23a.

ISSUE (SREC-02)

The DEIS is not *"targeting highest priority recreation needs to help focus limited resources"* (DEIS Vol 1 Page 615). The DEIS has identified the need for more multiple use recreation, yet it seeks to reduce multiple use recreation by creating a PCT Corridor.

Regarding Sustainable Recreation the Forest Plan DEIS recognizes the -

*"Current plan direction for recreation varies by national forest. The existing plan direction was based on recreation uses and recreation demand existing and projected from the late 1970s and 1980s when forest plans were first developed. **The emphasis of the current plans is on improving recreation opportunities** by focusing on the maintenance, development, adaptation, or alteration of dispersed and developed recreation sites **consistent with the recreation opportunity spectrum class of the area**. There is an emphasis to continue existing partnerships and volunteerism and to evaluate opportunities to develop new partnerships and volunteers to increase the amount of trails and facilities managed to desired standards."* (DEIS Vol I Page 24)

Yet the DEIS fails to balance the recreation opportunity spectrum in order to improve recreation based on today's needs, or even to ensure the ROS is consistent with existing recreation.

Without designating more semi primitive motorized recreation opportunity the Forest Service cannot hope to meet even current needs, let alone the acknowledged increasing future needs for motorized recreation (Cordell et al 1999).

OUTCOME (SREC-02)

The areas where there are existing designated motorized Forest Service system motorized trails such as Long Canyon 34E40, Willow Gulch 34E41, Little Dry 32E52 and Dry Meadow 34E31 trails must be changed to semi primitive motorized recreation opportunity spectrum in order to make the ROS consistent with existing use of the above existing designated motorized recreation conditions, and to bring these areas into compliance with the existing motorized use; just as the Forest Service is doing for nonmotorized recreation in the Kaiser and Kiavah Wilderness areas. Otherwise the Forest Service DEIS is guilty of enhancing and providing ROS consistency only for nonmotorized recreation.

ISSUE (SREC-03)

Furthermore the Forest Plan DEIS states-

*"**Recreation opportunity spectrum classes have been updated** and the management approach for recreation settings is integrated with ecological restoration approaches. The draft forest plans include desired conditions to manage developed recreation sites for ecological, social, and economic sustainability. Management of opportunities, sites and infrastructure are adjusted to respond to changing demographics, budgets and deferred maintenance, as well as climate change."* (DEIS Vol I Page 31)

These are laudable goals we support, however the above statement is incorrect. The recreation opportunity spectrum has not been updated to reflect existing conditions (historic motorized system trails in nonmotorized areas), social, economic sustainability (the majority of the public recreate on multiple use lands) or changing demographics (the documented need for more motorized/mechanized

trails), or the need to provide more recreation visitor days (RVD) for motorized use in any alternative (Cordell et al 1999).

The EIS should disclose there is a need to develop more areas and opportunities for off-highway motorized recreation per the 2008 California Outdoor Recreation Plan.

Also the DEIS does not change the recreation opportunity in order to help reduce deferred maintenance by designating more motorized opportunity areas, since motorized access provides the most efficient form of maintenance, and by far the largest form of volunteerism is from motorized recreation.

Instead the DEIS seeks to reduce the motorized recreation opportunity areas in each alternative and make the trail system less sustainable.

OUTCOME (SREC-03)

The EIS must address the above and update the ROS as stated in the DEIS, which must include balancing the ROS to address the loss of SPM.

ISSUE (SREC-04)

One of the criteria the Forest Service DEIS states precluded areas proposed by the public for inclusion as Recommended Wilderness is if the area *"had pervasive impacts that would influence a visitor's **opportunity for solitude** including **pervasive sights and sounds from outside the area**" (DEIS Vol I Page 41).*

We are compelled to point out that each and every one of the areas being proposed for Wilderness Recommendation are adjacent to existing motorized trails, which precludes them from being considered for Wilderness Recommendation per the DEIS, as they do not provide an opportunity for solitude due to the adjacent motorized trails, as well as having pervasive the sights and sounds from the outside area due to adjacent motorized trails.

*"Also the presence, volume, and type of other users and the sounds and smells **associated with motorized vehicles** have all been identified by the public as **affecting the personal subjective sense of solitude**." (DEIS Vol I Page 31) Further confirming that areas adjacent to existing system motorized trails do not meet the public's criteria for recommended Wilderness either.*

The Forest Service recommendation of areas with adjacent motorized trails would create a non compatible use and would likely result in the future closure of the motorized route in direct violation of the Forest Service desire to meet existing and future needs of motorized recreation, and would harm the Forest Service ability to provide at least 64% of the Forest trail system for motorized use in order to provide a sustainable motorized trail system and provide user satisfaction. (Cordell et al 1999)

Therefore we find the DEIS is mistaken in concluding that "*Alternatives B, C, and D contain the following plan components to **help achieve sustainable recreation***" and "*REC-FW-DC-04: Visitors can connect with nature, culture and history through a full range of inclusive and **sustainable outdoor recreation opportunities.***" (DEIS Vol 1 Pages 478, 486 & 492)

After all the DEIS seeks to reduce motorized recreation opportunity, so this must harm sustainability not help it.

OUTCOME (SREC-04)

The EIS must disclose and consider-

1. The lack of suitability for recommended Wilderness area adjacent to motorized trails.
2. Update the statements to reflect that alternatives with recommended wilderness would not help achieve sustainable recreation.
3. That recommending moving wilderness boundaries adjacent to motorized trails is creating a non compatible use.
4. The need to provide at least 64% of the Forest trail system for motorized use in order to provide a sustainable motorized trail system and provide user satisfaction.

ISSUE (SREC-05)

The EIS must recognize that hiking and horseback are the primary causes of wildlife breeding disturbance due to their longer dwell times and unpredictable behavior, as well as cross country travel. (Gaines et al., 2003; Zielinski et al. 2008; Sprung, Gary, 2004; Spahr, Robin. 1990; Wernex, J., 1994)

Instead the DEIS continues to push the assumption of those who personally object to mechanized and motorized recreation, and therefore anthropomorphize that animals must somehow feel the same way that they do (DEIS VOL I Page 346). This is not born out in research. The DEIS attempts to justify this false assumption because it has "*long been employed.*" The time has come to rethink this issue based on facts in order to provide sustainable recreation while best protecting the resource.

The DEIS mistakenly focuses on limiting mountain biking and off-highway vehicle use due to possible concerns of wildlife breeding disturbance, when a likely larger problem is the impacts caused by hiking and equestrian use. The DEIS mistakenly seeks to limit mechanized and motorized use due to breeding species and habitat concerns.

OUTCOME (SREC-05)

The EIS must reconsider these issues based on the above and remove limitations on mountain bike and motorized use.

Or failing that, in order to comply with the same environmental regulations to minimize known impacts, the EIS must also seek to limit the hiking and horseback to the same extent as mechanized and motorized use.

ISSUE (SREC-06)

Likewise in terms of erosion and riparian areas the EIS should recognize-

"that precipitation will cause erosion even without human travel, and this factor may significantly outweigh the effects of travel. Trail design, construction, and maintenance may be much more important factors in controlling erosion than excluding specific user groups."(Wilson and Seney1994)

"No statistically significant difference between measured bicycling and hiking effects (Wilson and Seney1994). That horses caused the most erosion of the trails, and that motorcycles traveling up wetted trails caused significant impact. They also concluded, "Horses and hikers (hooves and feet) make more sediment available than wheels (motorcycles and off-road bicycles) on prewet trails, and that horses make more sediment available on dry plots as well." (Sprung, Gary, 2004)

OUTCOME (SREC-06)

The EIS must disclose the above as general guidance consideration for trail designation, maintenance or building trails. (*Sprung, Gary, 2004, Wilson; John P. and Seney, Joseph. 1994*)

ISSUE (SREC-07)

The DEIS mistakenly states that dispersing recreation use will adversely impact habitat condition (DEIS Vol I Page 347). It is well established that dispersing use on larger trail systems reduces environmental impacts by reducing the number of users per mile and therefore reducing impacts to wildlife and habitat. (***USDA Forest Service- National Off-Highway Vehicle Activity Review 1996, File Code: 1410/2350***)

Dispersing use also reduces both environmental impacts such as erosion and maintenance costs, due to the lower impacts of fewer users per mile. On the other hand concentrating use, as the DEIS proposes to do, increases environmental impacts by increasing the number of users per mile.

OUTCOME (SREC-07)

The EIS needs to disclose this and state that dispersing use on larger trail systems reduces habitat impacts. Perhaps the DEIS is concerned with the impacts of cross country dispersed recreation, which would increase habitat impacts compared to staying on a trail system. If so the DEIS statement should be revised to state that dispersed cross country hiking and horseback recreation use will adversely impact habitat (since both motorized and mechanized recreation use are already prohibited from cross country travel).

ISSUE (SREC-08)

The DEIS makes an incorrect generalization stating that one of the primary threats to the endangered Bakersfield Cactus is off-road vehicle use in the Sequoia National Forest (DEIS Vol I Page 433).

This is not possible since Bakersfield cactus does not exist on any designated trail tread, and off-road vehicle use in the Sequoia National Forest is limited to designated trails. Perhaps the DEIS was thinking back to more than a decade ago when cross country off road vehicle use was still allowed in the Sequoia National Forest.

Since the Bakersfield Cactus "*population on the Sequoia National Forest occurs in a steep rocky canyon, and is largely excluded from effects of land management activities*" (DEIS Vol I Page 433) "*and because the listed species occupy such limited habitat*" (DEIS Vol I Page 458), it seems virtually impossible for OHV recreation on designated trails to be a threat to the plant as the DEIS claims.

Therefore the EIS must be updated by removing the reference to off-road vehicles being a threat to Bakersfield Cactus since cross country travel is no longer allowed and the area where the Bakersfield Cactus is located on steep rocky canyons where designated OHV trails are not located and therefore is not an impact.

Likewise DEIS Table 96 lists OHV Recreation as a known threat to numerous Species of Conservation. This seems highly unlikely since OHV recreation is confined to designated trails and trail tread is a highly unlikely place for plants to grow.

Also trail treads are excluded from being considered for habitat impacts, since they are not suitable habitat for anything. Trail tread is a miniscule portion of National Forest Lands, that it is really inconsequential especially in terms of a 30,000 foot broad programmatic Forest Plan. The EIS must remove OHV recreation as a threat for any Species of Conservation in Table 96.

If the DEIS continues to cite OHV trail tread as having negative impacts on species, then the DEIS must also disclose that non motorized trail tread have a identical negative impacts on species. After all plants do not know if trail tread is an OHV trail or a hiking trail. The impacts from non motorized trail tread

would be far greater than motorized trails, since there are far more miles and therefore acres of non motorized trail tread.

Therefore the DEIS is mistaken when it states that "*recommendation of wilderness that would protect some species of conservation concern plants*" (DEIS Vol I Page 459). The primary difference between wilderness lands is that they prohibit OHV and mountain biking, both of which we have shown when done on system trails per current Sequoia National Forest management pose no threat to plants.

OUTCOME (SREC-08)

The above listed incorrect statements must be removed from the EIS.

The EIS must remove OHV Recreation as a threat to species of conservation, since trail tread is excluded from being considered habitat, and plants do not grow on the trail tread that OHV use is confined to.

Assumptions

ISSUE (AS-00)

The Consequences Common to Alternative B, C and D have been determined based on all lands the PCT travels through in California, including private lands and renewable energy on BLM lands (DEIS Vol 1 Page 550).

Using a cumulative analysis area including all other areas which the PCT crosses (including private) in California is useless when applied to this 3 Forest plan. Especially given 89% of the PCT is located in wilderness in those Sequoia, Sierra and Inyo National Forests. The 1982 PCT Comprehensive Management Plan requires PCT issues to be specific to the local area in order to be addressed under a Forest Plan.

Furthermore the Inyo, Sierra, Sequoia Forest Plan DEIS states "*The analysis area for the Pacific Crest Trail considers local, **regional and national scales** based on the unique and distinctive role and contributions the trail plays providing recreation opportunities and connecting three states and numerous public land entities*". (Forest Service Handbook 1909.12, chapter 20, section 22.32 3(f)).

OUTCOME (AS-00)

Yet the 3 Forest DEIS is not a plan for all of California, nor even for all of the PCT in California.

The EIS must accurately reflect the Cumulative Environmental Consequences solely within the 3 Forest Planning Area. If the PCT needs to be analyzed on the regional and national scale, as the DEIS claims, then all PCT management changes must be done under a PCT regional or national planning process, not under a three Forest Plan revision.

ISSUE (AS-01)

The DEIS states -

"Population growth in California is expected to grow at approximately 500,000 people each year and reach 50 million by 2050 (California 2014). Increased demand for outdoor recreation opportunities and the need for all types of recreation experiences to be improved is expected to continue" (DEIS Vol 1 Page 550).

Interestingly the above statement is in the Pacific Crest Trail section, not the general recreation section. More importantly the DEIS then goes on to restrict other forms of recreation such as through the PCT Corridor, contrary to the stated need to provide more opportunity.

The DEIS also states in the PCT section that there will be even more PCT based restrictions on other forms of recreation and land use.

"Visitor use management actions by Federal land management agencies to limit impacts to the trail's (PCT) physical resources and social settings are likely to increase as a cumulative effect" (DEIS Vol 1 Page 550).

Normally one would think this visitor management and increased restrictions regarding the PCT would be limited to the PCT, however with the advent of the PCT Corridor the increased visitor management and restrictions are expanded to a huge swath of land twice the size of Rhode Island.

The DEIS has provided no basis or need for these increased restrictions. Indeed these PCT based restrictions run counter to the DEIS identifying an increasing need for more multiple use recreation opportunity.

OUTCOME (AS-01)

The EIS needs to re-analyze and address this need for more multiple use recreation opportunity in relation to the proposed PCT Corridor's expanded cumulative impacts on other forms of recreation.

ISSUE (AS-02)

The DEIS states *"Funding will be available to implement restoration measures proposed, including non-native invasive plant treatments"*. (DEIS Vol I Page 429)

OUTCOME (AS-02)

Likewise the EIS should contain an assumption statement that funding will be available to implement recreation trail maintenance in order to meet Forest Plan desired condition of sustainable trails, public recreation demand and to reduce environmental impacts. Instead the DEIS states the Forest Service will be reducing recreation staff and funding over the next 15 years. (DEIS Vol I Page 461)

Pacific Crest Trail Management and PCT Corridor

We are greatly concerned that a Pacific Crest Trail Management Area or Corridor would increase restrictions on motorized/mechanized and most other forms of recreation by increasing the existing PCT Management area from 219 acres up to a maximum of 263,365 acres in the three forests with the potential to prohibit other forms of existing recreation near or crossing the PCT within this area (DEIS Summary Tables S-3, S-4 & S-5).

We find this not in keeping with the 1982 PCT Comprehensive Management Plan , 1981 Sequoia PCT Management Plan, Executive Order (EO13195), the existing Recreation Opportunity Spectrum, or reasonable management practices for multiple use lands.

Surprisingly the Sequoia DRLMP does not acknowledge the need to manage the PCT per the existing 1981 Sequoia Pacific Crest Trail Management Plan which is still in effect . Nor is the 1981 Sequoia PCT Plan listed in reference section of the DEIS. This must be corrected in the Sequoia FEIS/FLRMP.

Out of 160 miles of Pacific Crest Trail in the Sequoia/Inyo/Sierra Forest Planning area only 18 miles are located outside of Wilderness (DEIS Vol 1 Table 133). Since only hiking and horseback are allowed in Wilderness the only areas where the PCT Corridor would have any real effect are those 18 miles located on multiple use lands.

So the PCT Corridor is not really about the PCT. It is about restricting other forms of recreation crossing or in the area of the PCT along those mere 18 miles of trail.

The PCT Corridor would in effect make defacto wilderness along those 18 miles of PCT trail while harming other forms of recreation contrary to the mandate for the PCT to coexist in harmony with all other land uses. Nine of the eighteen miles for which the Forest Service is proposing a new PCT Corridor outside of Wilderness would close numerous existing historical motorized trails that are currently in process for possible designation as Forest Service trails. This would be in violation of Forest Planning to not effect Travel Management.

Piute motorized trails are mentioned five times in the 740 page DEIS. Four of those times are within the PCT section of the DEIS where the Piute motorized trails are mischaracterized and marginalized, as well as being classified as "limited motorized trails" in the Sequoia DLRMP. Not once are the World Class Piute motorized trails accurately described.

It can be no coincidence that the nine miles of PCT Corridor are in the Piutes which the PCTA covets to make into a PCT Wilderness experience.

Furthermore the recently completed 2016 Kern County Sheriff's "Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report" determined that the vast majority (89%) of those PCT hikers who had contact with motorcycles or ATV's said it did not detract from their PCT experience. It appears that most PCT hikers are perfectly happy to share public lands with other uses. This indicates that PCT hikers in general would not see the need for a PCT Corridor.

ISSUE (PCTCOR-01)

Under PCT *Visitor Use (MAs-PCTW and Potential Management Approaches)* the DEIS states PCT "*Visitor use would not directly vary by alternative*" and "*We anticipate visitor use to continue to grow based on the increased interest in the Pacific Crest Trail in the past three years....*"

Considering PCT use will continue to increase and the creation of a PCT Corridor will have no effect on PCT usage, there is no justification for creating a PCT Corridor, especially since the PCT Corridor would harm other forms of recreation.

Furthermore "*Eighty-nine percent of the plan area and most of the Pacific Crest Trail Management Area on the Inyo and Sierra National Forests¹⁷ is within designated wilderness where motorized and mechanized use is prohibited and no road construction would be allowed*" (DEIS Vol 1 Page 545).

OUTCOME (PCTCOR-01)

The EIS should acknowledge that 89% of the PCT in Wilderness is sufficient to meet the 1982 PCT Comprehensive Management Plan. That the mere 11% of the PCT on multiple use lands are supposed to be part of the PCT Experience according to the 1982 PCT Comprehensive Management Plan (page 21).

ISSUE (PCTCOR-02)

As justification for the PCT Corridor and PCT Management Area being part of this Forest Plan Revision the Forest Service claims "*The Comprehensive Management Plan requires that land management*

¹⁷ It seems likely there is a typo in the DEIS and Sequoia should have been included in that statement since it is in a section about the three forests

planning processes produce a “strategy for 2nd level planning” that interfaces with the Comprehensive Management Plan.”¹⁸

However according to that 1982 PCT *Comprehensive Management Plan* we would point out that ***"It is intended that these processes will produce a second level of planning for the trail that is responsive to specific issues, concerns, opportunities, and problems unique to each administrative unit"***. (Page 18)

Yet the DEIS has not identified any ***"specific issues, concerns, opportunities, and problems unique to each administrative unit"*** regarding the PCT Corridor and PCT Management Area in order to comply as a second level plan issue. Nor has A Need for Change been documented.

Moreover the Forest Service has claimed they need to implement the PCT Corridor due to Executive Order (EO13195) regarding National Scenic Trail Corridors, which would be a trail wide, 25 Forest PCT issue, not a specific unique issue for each administrative unit.

The intent of second level planning is clearly to address local specific issues.

OUTCOME (PCTCOR-02)

The DEIS acknowledges that the PCT Management Area environmental consequences must be based on all lands the PCT crosses including Forest Service, BLM and private lands (DEIS Vol 1 Page 550). Therefore the EIS must recognize that the PCT Corridor and PCT Management Area are issues for the entire 2650 mile PCT, which is not a "specific problem unique to the planning area.

Further the DEIS has not identified any local PCT "specific problems unique" to the "administrative unit" (planning area) that would trigger "second level Planning". Therefore the EIS cannot utilize "second level planning" for the PCT under this Forest Plan.

ISSUE (PCTCOR-03)

The DEIS does not analyze or disclose the impacts of creating a PCT Corridor Management Area such as restricting other forms of recreation and the associated negative impacts on those other forms of tourism. Nor does the DEIS analyze or disclose the increasing environmental impacts by forcing other forms of recreation on smaller trail systems.

What is the purpose of the PCT Corridor? The Forest Service DEIS claims *“The PCT corridor would be identified as a management area and plan components would be added to protect the recreation*

¹⁸ USDA Forest Service Pacific Southwest Region Forest Plan Revision Webinar Summary-Beth Boyst Page 8

experience and scenery resources along the PCT. Identification of the PCT corridor and associated direction does not currently exist in forest plans."

Also Slide number 11 of the Forest Service DEIS PowerPoint presentation "*Forest Plan Revision Inyo, Sequoia, Sierra National Forests- June 2016*" describes Alternative B as "**creating a new PCT corridor**".

OUTCOME (PCTCOR-03)

We would point out that according to the 1982 PCT Comprehensive Management Plan the PCT is supposed to include experiencing the very multiple use which the proposed PCT Corridor and Management Area would preclude.

We would also point out that if changing PCT management direction or creating a PCT Corridor or Management Area as currently being proposed in the DEIS, then amending the 1982 PCT Comprehensive Plan would be the only place to do so, since it is the guiding document for PCT management, and that Forest Service Tiering of plans (CFR1508.28) does not allow for a specific PCT management change to be bounced back up to a broad 30,000 foot programmatic Forest Plan, but instead requires amending the existing PCT specific plan.

Also Forest Plans are not allowed to make project level changes or affect Travel Management, which a "new PCT corridor" would do by preventing existing inventoried trails within the Piute Travel Management Plan from being further considered for designation as Forest System Trail.

The Forest Service must consider this and remove the PCT Corridor and Management Area from the Sequoia, Inyo and Sierra FEIS.

ISSUE (PCTCOR-04)

Through the proposed PCT Corridor, the DEIS condones more restrictions, further concentrating use on the Piute single track motorized trail system, which has far more users per year than this nine mile Piute section of the PCT trail.

OUTCOME (PCTCOR-04)

The FEIS should remove the PCT Corridor proposal from the Piute segment of the Sequoia National Forest in order to prevent concentrating use and associated increased environmental impacts and reduction of user satisfaction on the Piute Single track system, and to allow the in process Sequoia Piute Travel Management Plan to analyze and consider all inventoried trails including those that might be eliminated from analysis by the proposed PCT Corridor.

The greatest "net public benefit" (*1988 Sequoia LRMP ROD*) would be met by the preferred alternative and ROD not having a PCT Corridor in the nine mile Piute area, due to much large motorized use

numbers on the proposed action Piute motorized trail system in and around the proposed nine mile PCT Corridor area.

ISSUE (PCTCOR-05)

The Forest Service is not required to provide a wilderness experience on the PCT, such as by a PCT Corridor, and according to the Forest Service PCT usage will not be positively or negatively affected by providing the PCT Corridor.

The Pacific Crest Trail Association (PCTA), a private organization has stated they want to make the entire length of the PCT into a wilderness experience. The PCTA also incorrectly state that motorized use crossing or near the PCT conflicts with the PCT experience.

Both the PCTA positions are totally invalid.

The PCT experience is determined by the 1982 PCT Comprehensive Management Plan, which specifically states the PCT must coexist in harmony with all other land uses" and the PCT "experience will include seeing activities such as road construction, logging, prescribed burning, herbicide application, mining, etc.". Sadly the Forest Service DEIS appears to have embraced the PCTA's invalid and inappropriate agenda to create a PCT Corridor harming all other forms of recreation and is contrary to the PCT Plan.

Furthermore the recently completed 2016 Kern County Sheriff's "Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report" determined that the vast majority (89%) of those PCT hikers who had contact with motorcycles or ATV's said it did not detract from their PCT experience. It appears that most PCT hikers are perfectly happy to share public lands with other uses. This indicates that PCT hikers in general would not see the need for a PCT Corridor.

OUTCOME (PCTCOR-05)

The EIS PCT Corridor and PCT Management Area proposal should be removed from areas outside of Wilderness in order to continue to meet the PCT management direction of the PCT experience including multiple use.

ISSUE (PCTCOR-05)

The DEIS correctly states for Alternative A that "*The current plans manage the Pacific Crest National Scenic Trail according to direction provided by a 1982 comprehensive management plan (USDA FS 1982) and direction is focused on the trail tread and immediate surroundings*" (DEIS Vol 1 Page 24).

Map 57 shows PCT management under the 1982 PCT Comprehensive Management Plan for that alternative A (DEIS Vol 3 Page 61). It does not show any PCT Corridor or PCT Management area since that is not part of the 1982 PCT Comprehensive Management Plan.

All other alternatives contain a new PCT Corridor or PCT Management Area. The DEIS does not state it will manage the PCT per the 1982 Comprehensive Management Plan, instead it states that "*The draft forest plans would create a management area allocation for the Pacific Crest National Scenic Trail by defining a corridor of the visual foreground landscape zone*" (DEIS Vol 1 Page 31, 36, 40).

Since creating a PCT Corridor and PCT Management Area are not part of the 1982 PCT Comprehensive Management Plan, the DEIS has confirmed that it is not going to manage according to the 1982 PCT Management Plan for alternative B, C or D.

OUTCOME (PCTCOR-05)

The Forest Plan must manage per the 1982 PCT Comprehensive Management Plan. Therefore the Forest Service is attempting to change PCT management, which is beyond the scope of a Forest Plan and a violation of NEPA. The new PCT Corridor and PCT Management Area must be removed from alternatives B, C and D and replaced with the statement that the Forest Service will manage the PCT per the 1982 PCT Comprehensive Management Plan.

ISSUE (PCTCOR-06)

The DEIS correctly states "*The Pacific Crest Trail Comprehensive Management Plan allows for the full range of the recreation opportunity spectrum to be experienced*" (DEIS Vol 1 Page 544).

OUTCOME (PCTCOR-06)

However the creation of a PCT Corridor would violate the above statement by subverting the Recreation Opportunity Spectrum (ROS) in the Piutes where the PCT Corridor would effectively make the existing motorized (SPM) in to non motorized (SPNM) by prohibiting existing motorized trails or new motorized trails in the PCT Corridor. The PCT Corridor would restrict all other forms or recreation in the same way as the Primitive ROS with motorized cherry stems such as in Wilderness.

The DEIS fails to consider this. The DEIS cannot subvert ROS areas. The FEIS must consider this and remove the PCT Corridor and PCT Management Area s which are not in Primitive ROS.

ISSUE (PCTCOR-07)

By law, the EIS should simply acknowledge the Forest Service will manage the PCT according to the 1982 PCT Comprehensive Management Plan and in the case of the Sequoia NF also the 1981 Sequoia PCT Management Plan.

Since the Forest Service DEIS has quoted the PCT Plan, then the EIS must include quotations that document the complete or "comprehensive" nature of the 1982 PCT Comprehensive Management Plan. The DEIS states that, the Comprehensive Plan directed that each "*National Park, Bureau of Land Management District and National Forest will integrate the direction and guidance provided by the Comprehensive Plan into their respective land management planning processes.*"

OUTCOME (PCTCOR-07)

We of course agree, but in order to integrate that very PCT Plan direction and guidance, the FEIS must fully disclosure other statements from the 1982 PCT Comprehensive Management Plan showing the full range of guidance, such as that establishment of corridors is removed from the PCT Plan and that the PCT must coexist in harmony with other forms of recreation and that seeing roads, mining, logging, developed recreation are part of the PCT experience.

Here are some of those citations from the 1982 PCT Comprehensive Management Plan which the DEIS chose not to quote in the PCT Background section -

- "*Delete all language that requires the establishment of zones or corridors*" (PCT Comprehensive Management Plan page 25)
- "Within Federal lands outside National Parks and Wilderness (57% of the whole trail), the trail must co-exist in harmony with all other resource uses and activities of the land as determined through the land management planning process. The trail will cross a mosaic of areas differing in primary management emphasis. This could be grazing, key wildlife habitat, special interest such as scenic or geologic, developed recreation, unroaded recreation research natural, or intensive timber management. Viewing and understanding this array of resources and management is one of the primary recreation opportunities to be made available over these portions of trail. Some activities such as road construction, logging, prescribed burning, herbicide application, mining, etc., will require considerable informational and interpretive skills to be placed in a positive perspective from the standpoint of the user. The agencies should look at this as an opportunity to explain the multiple- use concept." (PCT Comprehensive Management Plan page 21)

Unless these other citations are added to the EIS the responsible official will be making a decision based on partial and biased information which may lead to improper decision, the consideration of a PCT Corridor being one of them.

ISSUE (PCTCOR-08)

The DEIS also cites Executive Order No. 13195, Trails for America in the 21st Century (2001), in order to misrepresent that this order **requires** all National Scenic Trails to have a corridor, when it does not.

Executive Order 13195 does not state that all National Scenic Trails must have a corridor. It states that protecting the trail corridors associated with National Scenic trails is a high priority. Nowhere does it say that all National Scenic Trails must have a corridor or that the PCT has a Corridor associated with it. Nor does EO13195 give any direction for the creation of corridors for any National Scenic Trail.

Likewise Directives FSH1909.12 Section 24.43 states a National Scenic Trail Corridor "may" be created, it does not state a Corridor "must" or even should be created.

OUTCOME (PCTCOR-08)

Considering that all language regarding the establishment of a PCT Corridor were specifically deleted from the 1982 PCT Comprehensive Management Plan, and that there is no direction from the Forest Service or the Executive Branch to create a PCT Corridor, there is no basis to include a PCT Corridor in the Forest Plan EIS.

Also we continue to object to the Forest Plan Revision EIS making any changes in management of the Pacific Crest Trail, such as PCT Corridor or PCT Management Area, as being beyond the scope of Forest Plan Revision and contrary to Directives FSH1909.12 Section 24. Changes to the PCT Management must be done through a separate full NEPA process to amend or revise the 1982 PCT Comprehensive Management Plan and 1981 Sequoia PCT Management Plan.

ISSUE (PCTCOR-9)

The Inyo, Sierra, Sequoia Forest Plan DEIS states *"The analysis area for the Pacific Crest Trail considers local, **regional and national scales** based on the unique and distinctive role and contributions the trail plays providing recreation opportunities and connecting three states and numerous public land entities"*. (Forest Service Handbook 1909.12, chapter 20, section 22.32 3(f)).

It would be inappropriate to make changes to PCT management in just three National Forests, as this DEIS does, and then have to make changes in other Forest Plans and other agency plans all of which may be different.

"Forest plan decisions regarding management of the PCT on the Inyo, Sequoia, or Sierra National Forests would not set precedent for forest plan decisions on other national forests that manage portions of the Pacific Crest National Scenic Trail. We rely on public scoping to assist with identifying issues and concerns with the PCT management on a local forest. It is possible that

some of the issues brought forward in these three forests may be relevant to the next forest plans under going revision but the resolution of those issues could vary depending on local conditions." (USDA Forest Service Pacific Southwest Region Forest Plan Revision Webinar Summary Page 8)

OUTCOME (PCTCOR-9)

The Forest Service is seeking consistency but subjecting PCT management to the possible variances of 25 unique Forest Plan revisions over the course of decades is totally inappropriate for a National Scenic Trail.

PCT Management for this National Scenic Trail should be consistent by addressing it on the scale of the PCT trail which "*traverses portions of 25 national forests, six national parks, seven Bureau of Land Management Field Offices, four national monuments, one national scenic area, as well as, state and private lands in the states of California, Oregon, and Washington*" (DEIS Vol 1 Page 533).

PCT Management changes should be done by amending the 1982 PCT Comprehensive Management Plan.

ISSUE (PCTCOR-10)

The DEIS Recreation Opportunity section states "*Management of the Pacific Crest Trail is designed to harmonize with and complement established multiple-use plans to ensure continued benefits from the lands. Managers protect the integrity of the trail by avoidance, mitigation, and modifying management practices as needed.*" (DEIS Vol 1 Page 536)

OUTCOME (PCTCOR-10)

The creation of a PCT Corridor would eliminate the ability of managers to perform those functions and would change the 11 year in process existing multiple use Piute motorized trail plan. This can hardly be characterized as "harmonizing and complimenting established multiple-use plans". The FEIS should allow PCT Management to come solely from the 1982 PCT Comprehensive Management Plan.

ISSUE (PCTCOR-11)

The PCT was relocated in an EA for the Tahoe area in order to move the PCT to discourage mountain bike trespass, provide separation from motorized recreation as well as to improve water sourcing for PCT users. The relocation also provided new OHV and mountain bike opportunities.

OUTCOME (PCTCOR-11)

Instead of proposing a PCT Corridor to restrict other forms of recreation like motorized and mechanized use in the Sequoia; the Forest Service should be proposing relocating the PCT in the Sequoia if they wish to have the trail located away from motorized trails as is underway at Pack Saddle in Tahoe NF.

ISSUE (PCTCOR-12)

Additionally the DEIS states the 1982 Comprehensive PCT Management Plan is the guiding document for PCT management direction, and the Forest Service feels it has limited specific direction over a few miles of trail-

"The current plans manage the Pacific Crest National Scenic Trail according to direction provided by a 1982 comprehensive management plan (USDA FS 1982) and direction is focused on the trail tread and immediate surroundings. Most of the Pacific Crest Trail is within existing wilderness areas except for 13 miles on the Sequoia National Forest and 5 miles on the Inyo National Forest. In these areas, there is limited specific plan direction to guide activities adjacent to the trail that may impact the scenic and recreational values of the trail." (DEIS VOL I Page 24)

OUTCOME (PCTCOR-12)

We would point out the current limited PCT plan direction for those 18 miles of the PCT on multiple use land was intentional in order for the PCT not to restrict other uses on those lands.

The direction limited or otherwise in the PCT guiding plan cannot be changed without amending that 1982 PCT Comprehensive Plan, which cannot be subverted or changed in a broad general programmatic plan such as this Forest Plan Revision.

Recreation Places

The "Recreation Places" in DLRMP is a new concept, which is very similar to "Management Areas" in the current Sequoia Forest Plan¹⁹. The main difference being that DEIS Recreation Places are only about recreation, whereas Sequoia Forest Plan Management Areas include Desired Conditions for all types of uses including recreation.

So it was surprising that the DEIS Recreation Places does not carry forward the recreation "emphasis" from the current Sequoia LRMP (1988) Management Areas.

For example the current Sequoia Plan recreation "emphasis" for many areas state that "*OHV use, hiking, viewing scenery, and equestrian use will be the primary activities*"²⁰; or that Semi Primitive Motorized will be emphasized. (Sequoia LRMP 4-18) Yet the DEIS Recreation Places desired condition excludes or

¹⁹ 1988 Sequoia National Forest Land Resource Management Plan

²⁰ 1988 Sequoia National Forest Land Resource Management Plan Chapter 4

seeks to limit OHV recreation, and excludes equestrian, as well as reducing semi primitive motorized. When has the Forest Service changed this management direction? We find no environmental analysis in the DEIS leading to these changes.

We find the current Sequoia Forest Plan²¹ Management Direction to be far more accurate and inclusive compared to the DEIS. We urge the Forest Service to update the Recreation Places based on the current Sequoia Forest Plan Management Direction emphasis²².

ISSUE (REC-01)

The Sequoia Draft Revised Land Management Plan (DRLMP) Recreation Places section describes the attributes of each area in the Sequoia National Forest to connect the "*public to relevant places in the forest*".

The Desired Conditions are the focus of the Recreation Place section since they "*provide a framework to guide management efforts to sustain scenery settings and recreation settings, recreation opportunities and recreation sites*" (Sequoia DRLMP Page 68).

The Sequoia DRLMP contains seven Sequoia Recreation Places that offer motorized recreation-

1. Isabella Lake Place
2. Kern Plateau Place
3. Lower Kern River Place
4. Oak Mountain Front Country Place
5. Piutes Place
6. Upper Kern River Place
7. Greenhorn Place

Of those seven "Recreation Places" offering motorized recreation, only two mention motorized recreation in their "Desired Conditions". They are the Kern Plateau Place and Oak Mountain Front Country Place.

Yet other recreation such as "*world class whitewater boating, fishing, picnicking*" are specifically included in the desired conditions. If one existing form of recreation is going to be included then all that exist in that Recreation Place must be included as well. The Forest Plan EIS must be fair, honest and balanced.

Apparently the Sequoia DRLMP wishes to reduce and further marginalize motorized recreation in five of those Recreation Places Desired Condition which guides management and recreation opportunities. But the DEIS Recreation Places is supposed to include the existing conditions in the Desired Conditions. We

²¹ 1988 Sequoia National Forest Land Resource Management Plan

²² 1988 Sequoia National Forest Land Resource Management Plan 4-42 to 4-92

strenuously object to the EIS not including existing motorized use in the Recreation Places Desired Conditions.

Forest Staff must be aware of the value of these motorized opportunities, just due to the public enjoying these motorized trails in each of these Recreation Places. Not to mention the thousands of comments the Forest Service has received during recent Travel Management expounding the importance of each and every motorized trail in these Recreation Places. And let's not forget the tens of thousands of Sequoia motorized trail users the Forest Service documents in order to receive \$250k to \$750k in OHV funding each year.

Motorized off road recreation and mountain bike recreation are year round activities, and as such extremely important components for rural economies. Many sections of the DEIS proclaim the importance of world class whitewater boating, which is not only seasonal, but severely limited during drought or low water years.

So it is puzzling that the DRLMP Recreation Places Desired Conditions would include seasonal whitewater boating as important, but excludes the year round motorized and mechanized recreation opportunities these "Recreation Places" provide.

Getting back to the text for Recreation Places which states the Desired Conditions-

- The Piutes Place text states there are "*limited motorized trails*" (Sequoia DRLMP Page 73).
- Considering the Piutes Place currently has the largest motorized single track system in the state, one has to wonder how forest staff think it is "limited".
- Likewise the Lower Kern River Place text notes the "*limited number of motorcycle trails and other OHV opportunities*" (Sequoia DRLMP Page 71).

No other form of recreation is qualified as "limited" in any other Recreation Place. In fact nowhere else in the entire thousand plus page DEIS is any other form of recreation considered limited. However the DEIS does talk about world class whitewater boating. So why not world class motorized trails?

When one realizes the Piutes is the area where the DEIS proposes a PCT Corridor that would "limit motorized trails", it is fairly evident there is an agenda in Forest Planning to shut down the Piute trails and indeed make them "limited", as well as marginalize motorized opportunity in general. This is totally unacceptable and inappropriate in a Forest Plan.

- Mechanized recreation in the form of mountain biking is not even mentioned in any Sequoia Recreation Place text or desired condition. Can Forest Staff really be that out of touch? Mountain River Adventure holds permits with the Forest Service for local mountain bike shuttles. One of the Top 100 Trails to Mountain Bike in California is in the Sequoia.
- The Sequoia DRLMP does mention mountain biking on Page 3 under the general conditions of the Sequoia, but not being included in the Recreation Places Desired Conditions means mountain biking is marginalized for future projects in favor of other forms of recreation.

- Mechanized recreation only appears in the Sequoia DRLMP as being prohibited in Wilderness and on the PCT.
- Downhill Skiing appears nowhere in the Sequoia DRLMP or Recreation Places even though Alta Sierra Ski Resort is on Sequoia Lands and has permits for operation.
- Horseback Riding is not in any Sequoia Recreation Places Desired Condition.

It must be noted by Sequoia Forest Planners that this same kind of bias against motorized recreation, downhill skiing and horseback riding was discovered in the Pacific Southwest Research Station Science Synthesis back in 2012²³, which was to form the basis for Sequoia Forest Planning. It was brought to the attention of the Forest Service by Stewards of the Sequoia and others, and as a result the Synthesis was rewritten. We are extremely saddened to see this kind of bias alive and well in the Sequoia Forest Plan DEIS Recreation Places. There must be no place for Forest Staff personal bias in any Planning process.

- Fishing is only included in one Sequoia Recreation Places Desired Condition (Upper Kern River). Although it is clearly very popular in other areas and perhaps the most popular activity in the Isabella Lake Place.
- Other forms of recreation also get the short end of the stick in the Sequoia DRLMP by not being included in the Recreation Places Desired Conditions such as hunting, rock hounding and kite boarding.

All together these forms of recreation which are not included in the DRLMP Recreation Places Desired Conditions are enjoyed by at least 36% (360,000) of Sequoia Forest visitors each year (Sequoia NVUM 2012). The Sequoia DRLMP has not provided any basis for 36% of their recreation visitation not being a Desired Condition by the Forest.

- The Greenhorn Place is completely missing from the text in the Sequoia DRLMP. This place contains the Just Outstanding trail, one of the Top 100 motorized and mountain bike trails in California.

The Inyo DRLMP has excluded fishing, horseback riding, mountain biking and rock hounding from the Recreation Places Desired Conditions even though these activities occur in up to ten Inyo Recreation Places. Hunting occurs in four Inyo Recreation Places, but is only included in the White Mountain Place Recreation Place Desired Condition.

The Sierra DRLMP has excluded fishing, hunting, mountain biking and rock hounding from the Recreation Places Desired Conditions even though these activities occur in three or more Inyo Recreation Places.

It should be noted that the Inyo DEIS contains an important section about how some forms of recreation have expanded, such as off road vehicle use, and these activities provide for vital economic benefits and sustainability to local communities (Inyo DRLMP Page 9).

²³ Stewards 2/19/13" Errors and Issues with "Science Synthesis to Support Land and Resource Management Plan Revision in the Sierra Nevada and Southern Cascades"

The DEIS /DLRMP must accurately represent the participation and value of all forms of recreation including motorized use.

This may be a product of regional staff being out of touch with motorized recreation and local Sequoia, Sierra, Inyo land use. However "limited" should not be part of the desired condition for any form of recreation.

1. How did Forest Staff determine that Sequoia motorized recreation is limited and other forms of recreation are not? How was it determined motorized use should not be listed in five of the Sequoia Recreation Places Desired Conditions? We are not aware of the public seeking to change the emphasis of motorized use in any of the areas.
2. How can the Sequoia DRLMP be allowed to marginalize important valid motorized recreation, while elevating other forms of recreation like whitewater boating?

OUTCOME (REC-01)

The Sequoia, Inyo and Sierra Forest DRLMP each fail to comply with the Multiple Use Sustained Yield Act (MUSYA) when they marginalize any form of recreation by calling it limited, or by not including it in the DRLMP Recreation Places Desired Conditions.

In order to comply with MUSYA, and meet the need to be balanced and fair, and represent existing conditions and public desires in a factual way as well as comply with FSM1909.20 Forest Planning the Forest Service must-

1. Update the Sequoia RLMP to include motorized and mechanized recreation in the Desired Conditions for each of the seven Recreation Places- (MA-KERN-DC) (MA-LWKN-DC) (MA-OAT-DC) (MA-PIUT-DC) (MA-UPKN-DC) (MA-FRKS-DC) and yet to be drafted Greenhorn Place DC.
2. Likewise update the Sierra and Inyo RLMP to include motorized and mechanized recreation in the Desired Conditions for each of their Recreation Places where those forms of recreation occur.
3. The Sequoia, Inyo and Sierra RLMP must not state limited motorized recreation, since this is a subjective judgment, which implies the inability to expand motorized recreation. Yet Travel Management is a separate ongoing process which may include the addition of motorized trails in future. To term any form of recreation as limited in a Desired Condition would be a predetermined outcome for future planning.
4. Add the missing Greenhorn Place section to the Sequoia RLMP, with an accurate Desired Condition for all recreation per the above comments.
5. Add a section to the Sequoia and Sierra RLMP, like the one in the INYO RLMP about how certain forms of recreation have expanded such as off road vehicle use, and these activities provide for vital economic benefits and sustainability to local communities (Inyo DRLMP Page 9).

Forest Plan Cannot Affect Piute Travel Management

ISSUE (TM-01)

As the Forest Service has pointed out FSM 1909.12 Chapter 20 prohibits a Forest Plan from including or affecting Travel Management or site specific trails. Yet the current Forest Plan will affect Travel Management and site specific trails by prohibiting existing inventoried motorized trails in the Piutes which are an integral parts of the existing World Class Sequoia Forest Piute motorized single track trail system such as U00020, U00054, U00030, U00051, U00114, U00112, U00037, U00015 from likely being considered for designation due the creation of a new PCT Corridor which prohibits other uses.

The closure of these existing Piute trails would create a disproportionately high and adverse effect on the local population and visitors by eliminating them from consideration under the current in process Piute Travel Management Proposed Action for designation to provide loop trail opportunity (USDA 1997).

These Historic trails predate the PCT. As a matter of fact the PCT is in places on what once were motorized trails. This makes it especially hard to understand why restrictions like the PCT Corridor, which would likely close these trails is even being considered in the Forest Plan.

The public who recreate on these motorized trails merely wish PCT trail use and management to coexist in harmony with the motorized trails, as it has done until now and as required under the 1982 PCT Comprehensive Management Plan.

These trails provide critical motorized connectivity as well during the winter due to being the only snow free trails, making them an integral part of the Piute motorized winter wheeled loop system. The closure of these trails would so fragment the loop that it would no longer provide winter loop opportunities.

These trails are currently listed on the "Sequoia National Forest Piute Mountain Travel Management Proposed Action Roads & Motorized Trails March 7, 2011" as being under consideration for designation as system trails, therefore they cannot be affected by the Forest Plan.

The proposed PCT Corridor will eliminate loops and create dead end trails contrary to Forest Service Desired Conditions. The closure of these trails due to the proposed PCT Corridor will harm the sustainability of the Piute trail system and discourage the very motorized volunteers who have increased Sequoia Forest maintenance by 400% in 2015 and other years.

The Kern County Sheriff's contacted 490 PCT hikers this past 2016 season. The Sheriff's Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report determined that 89% of those PCT hikers who had contact with motorcycles or ATV's, said it did not detract from their PCT experience. It appears that most PCT hikers are perfectly happy to share public lands with other uses. This strongly suggests user conflict is not an issue in the Piutes.

We submit the Forest Service cannot include the creation of a PCT Corridor as part of the Forest Plan as it will affect or subvert the ongoing 11 year Piute Travel Management Plan and preclude consideration of existing site specific trails in the Piute Proposed Action. A PCT Corridor will harm the social, economic and environmental sustainability of the World Class Piute motorized single track trails system with visitors from many nations.

Furthermore the DEIS acknowledges the Piute trails are in process "*to be added to the designated system of trails, they must be evaluated in a site-specific travel management analysis that is outside the scope of this forest plan revision analysis.*" (DEIS Vol 1 Page546) The PCT Corridor proposed in the DEIS would therefore be outside the scope of the forest plan revision since it would affect those very same site specific trails.

Since the Forest Service is well aware of all the above Sequoia Piute Travel Planning, then DEIS Table 145 is incomplete. It must include the mileage of non system trails currently under Piute Travel Planning which would be impacted under each alternative by the creation of the PCT Corridor.

The DEIS text of this section also fails to acknowledge in any way the above facts regarding the in process Sequoia National Forest Piute Mountain Travel Management Proposed Action Roads & Motorized Trails March 7, 2011. Therefore the public have not been allowed to comment accurately on the DEIS. The EIS must analyze these conditions as required under NEPA.

The DEIS does acknowledge the non system Piute routes (DEIS Vol 1 Page 546), but merely to say they must be evaluated in a separate plan (which the DEIS does not name even though it has been in process for 11 years and is a Proposed Action). However the DEIS acknowledgement of the Piute non system routes is another compelling argument that their mileage must be included in DEIS Table 145.

Even though the Forest Service continues to claim Forest Plans are 30,000 foot programmatic documents that do not work on a trail level, the DEIS includes twenty nine pages regarding the Pacific Crest Trail (DEIS Vol 1 Pages 532-551), in which the DEIS goes out of the way to cite and note many other plans and detailed information regarding the Pacific Crest Trail to the point of devoting one page about wind turbines on BLM and other non forest lands having no bearing on the Forest Plan.

However when it comes to the World Class Piute motorized trails system, which both the Forest Service and the Off Highway Motor Vehicle Division have spent hundreds of thousands of dollars in planning to produce the "Sequoia National Forest Piute Mountain Travel Management Proposed Action Roads & Motorized Trails March 7, 2011", the Forest Service merely notes the Piute motorized trails "are of interest to the motorized recreation community" and are "limited" (DEIS Vol 1 Page 537 & Sequoia DRLMP pages70-73). This grossly mischaracterizes the world class Piute motorized trails. Unless this is corrected the responsible official will be making a decision based on misinformation that could greatly alter the outcome of the Forest Plan by ignoring the current status of Piute Travel Management Planning and not giving them proper consideration to their status and importance.

OUTCOME (TM-01)

The FEIS must therefore correct this by acknowledging that-

1. The Piute Travel Management NOI states "Sequoia National Forest has a need to provide greater diversity of motorized recreational opportunity for a variety of vehicles used by forest visitors" and that the Piutes must "Provide diverse opportunities for vehicles capable of off highway travel."
2. A broad spectrum of diverse interests both motorized and non motorized were engaged during five Forest Service Piute Travel Management meetings to develop the Piute Mountain Travel Management Proposed Action Roads & Motorized Trails March 7, 2011 which was determined should bring all inventoried multiple use motorized non system trails into the Sequoia Forest designated trail system per the Sequoia National Forest Piute Mountain Travel Management Proposed Action Roads & Motorized Trails March 7, 2011. The Piute Travel Management plan has been put on hold by the Forest Service, but they have committed to resume the process once the Sequoia Forest Plan is completed and staff resources are freed up.
3. Forest Planning is not allowed to affect Travel Management.
4. The Piute Travel Management Notice of Intent also seeks to "Establish consistency with ROS settings and between the use of the Long Canyon/Dry Meadow Trail 34E31 and the 1990 Mediated Settlement Agreement by changing the ROS classification on 7,175 acres of semi primitive non-motorized land west of trail No. 34E31 to semi-primitive motorized. This would allow the continued motor vehicle use of NFTS trails 34E31, 34E41, and 34E52, and non-system trail U0013." which will be addressed in this Forest Plan Revision in order to rebalance the ROS and provide consistency with ROS settings.
5. The current Sequoia Forest Plan²⁴ determined the Piutes is an OHV Emphasis Area as shown and has historically been shared in harmony with PCT through hikers. There are no records of PCT complaints against OHV use in the Piutes and Forest Service field trips have found no evidence of OHV trespass on the PCT.
6. The Piute OHV Emphasis Area needs to be enlarged to reflect existing increased motorized use as predicted in the 1988 Sequoia National Forest LRMP. (*Sequoia 1988 LRMP ROD Page 17*)
7. The FEIS needs to analyze and consider the social, economic or environmental effects of closing non system trails in the Piutes via the creation of a PCT Corridor.
8. The new information from the Kern County Sheriff Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report must be disclosed and considered in the EIS.

²⁴ 1988 Sequoia National Forest Land Resource Management Plan

ISSUE (TM-02)

The PCT section of the DEIS talks cites the \$646 billion recreation economy-

Socio Economic Considerations

Trailwide: *The Outdoor Recreation Economy Report (Outdoor Industry Association 2012) identifies that outdoor recreation creates 6.1 million American jobs and produced \$646 billion in outdoor recreation spending each year and 80 billion in Federal, State, and local tax revenue. The outdoor recreation economy thrives when Americans spend their dollars in the pursuit of outdoor recreation. This spending occurs in two forms: the purchase of gear and vehicles, and dollars spent on trips and travel. It is estimated that for every dollar spent on gear and vehicles, four dollars are spent on trips and travel. (DEIS Vol 1 Page 543)*

The above DEIS PCT section did not mention in it, but since the Outdoor Recreation Economy Report is being cited it should also note that OHV recreation was the largest economic recreation activity, second only to camping (see below chart).

The Outdoor Recreation Economy Direct and Total Impact by Activity Category¹

OUTDOOR RECREATION PARTICIPANTS ANNUALLY SPEND:

| | Gear, Accessories & Vehicles | Trip Related Sales | Total |
|-------------------------------|------------------------------|--------------------|-------------------|
| Bicycling | \$10,538,970,178 | \$70,781,975,693 | \$81,320,945,871 |
| Camping | \$18,613,995,403 | \$124,769,735,895 | \$143,383,731,298 |
| Fishing ² | \$9,742,089,046 | \$25,725,732,919 | \$35,467,821,965 |
| Hunting ³ | \$8,525,723,987 | \$14,636,912,252 | \$23,162,636,239 |
| Motorcycling | \$10,024,945,513 | \$32,501,773,446 | \$42,526,718,959 |
| Off-Roading | \$13,160,580,559 | \$53,334,247,815 | \$66,494,828,375 |
| Snow Sports | \$7,718,490,380 | \$45,328,719,522 | \$53,047,209,901 |
| Trail Sports | \$12,251,578,246 | \$68,376,967,617 | \$80,628,545,863 |
| Water Sports | \$19,420,893,225 | \$66,776,605,002 | \$86,197,498,227 |
| Wildlife Viewing ⁴ | \$10,736,692,517 | \$22,585,482,854 | \$33,322,175,371 |
| All Activities | \$120,733,959,053 | \$524,818,153,015 | \$645,552,112,068 |

It should also be noted that Stewards provided that information numerous times to the Forest Service and were told this report was not peer reviewed and therefore could not be used. Yet now the Forest Service includes it in the PCT section, apparently to somehow justify PCT economic value and PCT based restrictions.

There are no specific categories in the report for Hiking and Equestrian, perhaps because of how small each would be in terms of dollar value. They are a small portion of camping and trail sports which would be far less than OHV recreation. Certainly the 4453 PCT hikers in 2015 cannot be expected to generate nearly the economic impact as the 15,000 people who enjoyed Sequoia OHV trails near the PCT also in 2015, or the nearly 1 million people who enjoy non PCT recreation in Sequoia (Sequoia DRLMP Page 42).

OUTCOME (TM-02)

The FEIS should cite the Outdoor Recreation Economy Report that shows OHV recreation is second only to camping as the largest economic recreation activity, and disclose the extremely minor PCT based recreation economic contribution.

ISSUE (TM-03)

The Forest Service has not provided a recreation demand analysis that supports the need for the PCT Corridor. However the huge level of participation in favor of designating all inventoried motorized trails through the Sequoia Piute Travel Management Plan 2010 meetings, as well as the massive motorized volunteer work on the Piute trails over the past 12 years, clearly demonstrates an extremely high level of support and demand for the Piute motorized trail system.

OUTCOME (TM-03)

The FEIS must consider this high demand for motorized trails, and need to allow analysis of all Piute trails per the Sequoia Piute Travel Management Plan Proposed Action 2011

ISSUE (TM-04)

According to the DEIS, last year 4453 PCT permits were issued for the entire 2650 mile trail working out to 1.7 PCT hikers per mile. By comparison the much smaller existing motorized single track trail system in the Piutes and the Kern Plateau OHV trail system of roughly 250 miles are enjoyed by more than 15,000 people each year, working out to 60 trail riders per mile. This shows that the Sequoia Piute OHV trails are 35 times more popular than the Piute section of the PCT. The DEIS has not justified the reduction of the more popular and higher demand Piute motorized trails, or the need to harm the greater " net public benefit" (NPB) of these multiple use trails. *(1988 Sequoia LRMP ROD)*

OUTCOME (TM-04)

The FEIS must analyze and consider further concentrating use, increasing impacts and reducing user satisfaction on the Piute motorized trails due to a miniscule number of people who have exclusive use of the PCT in the Piutes. We would also point out that PCT hikers in general have been found to be against the PCT Corridor by Kern County Sheriff investigation and survey.

ISSUE (TM-05)

The 2015 Planning Rule section 219.8 & 219.10 require the Forest Plan to provide social and economic sustainability. However the creation of a PCT Corridor and Management Area would harm the existing sustainable recreation in the Sequoia Piute Mountains, and harm existing multiple uses in the Piutes that contribute to local, regional, and national economies in a sustainable manner.

OUTCOME (TM-05)

This harm and therefore the PCT Corridor and Management Area are contrary to the desired condition of plan components under the 2012 Forest Planning Rule and must be removed from the FEIS.

ISSUE (TM-06)

The Pacific Crest Trail in many locations is not on the alignment recorded in the Federal Register and Forest Service maps. In some locations *“the trail has been located in an interim location”* (DEIS Vol 1 Page 536). The Forest Service will not be able to implement a corridor for a trail that is not on the legal alignment. According to the 1982 PCT Comprehensive Management Plan a full NEPA EA as well as approval by the Forest Chief and in some cases Congress are required prior to relocating or building new Pacific Crest Trail. (1982 PCR Plan Page 8, 19)

OUTCOME (TM-06)

The Forest Service FEIS must acknowledge that the PCT is not on the correct alignment and the agency will begin a planning process including NEPA EA to provide environmental and public approval for using the existing alignment.

ISSUE (TM-07)

The DEIS misleads the public when it claims the public disagreed with the proposed action except for eight listed issues. (DEIS Vol 1 Page 14).

Stewards and others have submitted numerous disagreements in several comment letters regarding PCT management changes²⁵, which are required to be considered under the 2012 Forest Planning Rule.

²⁵ Some PCT Corridor Objection Letters-

Stewards 9/29/14 Forest Plan Revision Comment for Sequoia, Sierra and Inyo

Stewards 11/5/15 Concerns with Changes to PCT Management in Forest Plan Revision

Kernville Chamber of Commerce 3/20/15 PCT Proposal Objections

Yet the PCT Corridor is not included in the list of issues the public has disagreed with. We must conclude our comments were not addressed and the DEIS was drafted without the benefit of considering our concerns with the proposed PCT Management changes.

OUTCOME (TM-07)

The FEIS must address this by acknowledging, analyzing and addressing the PCT related issues we and others have previously objected to regarding the PCT Corridor and Management Area.

ISSUE (TM-08)

The DEIS acknowledges that-

"Since the management plan for the Giant Sequoia National Monument was approved by the Regional Forester in 2012, there is no need to change this direction and this area is not analyzed in this EIS. The Giant Sequoia National Monument Plan will be the guiding document to provide management direction to the lands within the monument." (DEIS Vol 1 Page 2)

The DEIS also confirms that the PCT also has its own management plan (1982 PCT Comprehensive Management Plan), therefore the Forest Service must treat the PCT Management Plan with the same legal standing and respect that it does the Giant Sequoia National Monument Plan.

OUTCOME (TM-08)

The Forest Service would not dream of attempting to change or subvert management of the Giant Sequoia National Monument through a Forest Plan Revision, and likewise the Forest Service must not attempt to change the management of the PCT through a Forest Plan. Should there be a need to change PCT Management, such as a demonstrated need for creating a PCT Corridor or Management Area, the Forest Service must amend the 1982 Comprehensive PCT Management Plan.

ISSUE (TM-09)

Some may feel that PCT Hikers seek to isolate the PCT from other forms of recreation to create more of a Wilderness experience even on non-wilderness lands. However the Kern County Sheriff have just completed (Spring/Summer 2016) a survey of PCT Hikers in Sequoia National Forest. The vast majority of PCT Hikers polled had no problem with seeing or hearing motorized recreation from the PCT and

Lake Isabella KOA 2/1/15 PCT Corridor Objections
Lake Isabella Bodfish Property Owners Assoc 1/28/15 Sequoia Forest Plan Comment
United Trail Maintainers of California 1/20/15 Forest Plan Revision - PCT Proposal objections

recognized that public lands must be shared. Many were pleased to see such great motorized multiple use trails on their public lands.

Additionally Kern County Sheriff performed a seven month long investigation in response to allegation of OHV trespass on the PCT. The Sheriff found very few instances of OHV trespass and in each case the OHV left the PCT when a sign was seen. This indicates a need for the PCT users to better sign their trails, rather than a need to close OHV trails crossing or near the PCT.

Tens of thousands of dollars have been provided by OHV grants to help improve PCT signage. Restricting OHV use near the PCT is not a very good way for the PCT to "exist in harmony" with the OHV community.

The DEIS states that changes were made to Preferred Alternative B in response to comments submitted by the public. Yet many of the Stewards comments and citations are not in Alternative B. How were the all comments Stewards submitted incorporated into Alternative B?

*"We revised it from the original proposed action based upon our specialist knowledge and expertise **to address public comments we received on our proposal to revise the plans and during our other public engagement activities**". (DEIS Summary Page 7)*

The Preferred Alternative

*"Alternative B (the draft forest plans) has been identified as our preferred alternative for revising the Inyo, Sequoia, and Sierra National Forests land management plans. **This is based on public input**, our analysis of the alternatives, and what we think responds best to the issues. The preferred alternative is not a decision, but it's what we consider the best approach based on our analysis to date." (DEIS Summary Page 11)*

*"Since then, **public involvement efforts** have helped us identify the needs for changing the three plans as well as a proposed action and alternatives for developing the plans" (DEIS Vol 1 Page 4)*

OUTCOME (TM-09)

How has the Forest Service addressed or considered many of the comments Stewards have provided such as the need to recommend minor Wilderness boundary adjustments? The FEIS must address the concerns and comments that Stewards previously provided.

ISSUE (TM-10)

The creation of a corridor such as the one proposed for the PCT creates some management problems.

1. There are plans to relocate the PCT, but by having a PCT Corridor it will that much harder to relocate the trail due to corridor restrictions.

2. How can a PCT Corridor be implemented when the Corridor is fluid or moveable as the trail is relocated? The Forest Service cannot know the impacts of a fluid Corridor that is moveable and varies in width.
3. There is an intent to relocate the PCT to improve the PCT experience (DEIS Vol 1 Page 536). Once a PCT Corridor is established the impacts of relocating the trail would be much greater than if there were no PCT Corridor, and the impacts of any future PCT relocations would be unknown to the responsible official in this Forest Plan. It appears the DEIS has not considered these impacts. The responsible official has no way of knowing the impacts of a variable and movable PCT Corridor upon which to make an informed and valid decision.

NVUM Statements

ISSUE (NVUM-01)

The following statements from the DEIS are not supported by the Sequoia National Forest NVUM and are also likely untrue for the Sierra and Inyo-

*"Despite differences in recreation preferences across demographic groups and changes that have occurred over time, **the core set of activities preferred by the majority of people have generally been nonmotorized activities** like walking, picnicking, swimming, riding bicycles, and viewing and learning about nature."*

*"**Nonmotorized activities are popular on the three national forests and have maintained some of the highest participation rates** according to national visitor use monitoring data." (DEIS Vol I Page 464)*

We have repeatedly pointed out that according to the Sequoia OHV Grant and the National Visitor Use Monitoring study motorized recreation is the second most popular main activity, yet OHV Recreation is not included in the top ten most popular list (DEIS Vol I Page 473).

We must point out that the NVUM studies contains a disclaimer admitting that dispersed recreation is likely undercounted for every National Forest.

Off Road recreation is a dispersed activity. NVUM pollers have difficulty counting dispersed OHV use in Sequoia, so OHV participation is actually much higher than shown in the NVUM. Yet the Forest Service continues to trot out the same cut and pasted section without disclosing that motorized activities are far more popular than shown in the NVUM.

OUTCOME (NVUM-01)

The FEIS must be changed to state that motorized and nonmotorized recreation are extremely popular in the Sequoia National Forest and include OHV recreation in the consistent top five recreation activities. Here are presentations we provided to the Forest Service in 2013 explaining the MVUM ratings issue.

<http://www.stewardsofthesequoia.org/AVI/NVUM-Errors.mp4>

We objected about this NVUM statement error during scoping and were assured it would be corrected.

ISSUE (NVUM-02)

The ACCESS Section (DEIS Vol I Page 464) contains specific descriptions of every type of use except for motorized trail use.

OUTCOME (NVUM-02)

In order to provide full disclosure we suggest that EIS be updated and state that motorized single track trails are open to all forms of use both motorized and nonmotorized providing the greatest "net public benefit" (1988 Sequoia LRMP ROD) .

ISSUE (NVUM-03)

The PARTENRSHIP Section (DEIS Vol I Page 465) speaks about the leveraging of the agency investment when it states "*Partnerships and volunteerism are key components of sustainable recreation and allow the Forest Service to forge valuable relationships that help to provide a means of leveraging the agency's financial investment in recreation*". However this statement neglects to include the largest form of funding for these forests besides federal dollars which is from the CA OHV Grant Program, which is also leveraged on the agency's financial investment, as well as leveraged on volunteerism and partnerships, and is key to sustainable trails (many trails would still be in maintenance backlog if not for the OHV Grant Funding). The EIS must be updated to reflect this important leverage of the agency's financial and volunteerism, not to mention the largest outside funding source and disclose that both play key part for sustainable trails.

The Sequoia PARTNERSHIP Section (DEIS Vol I Page 474) states-

"Between 2010 and 2015, partners and volunteers for the Sequoia National Forest contributed 134,782 hours; 41,354 hours were for system trails and 959 hours were for restoration and

rehabilitation of landscapes and watersheds. Partners and volunteers helped to maintain approximately 249 miles of trail on the Sequoia National Forest in 2015."

This being the case Stewards of the Sequoia's mostly motorized volunteers were responsible for 72% of the trail maintenance in Sequoia National Forest with 180 documented miles of trail projects on Sequoia National Forest trails completed in 2015 which included clearing 1657 downed trees, building 315 water bars and brushing many miles of trails.

Stewards volunteers have increased Sequoia Trail maintenance by 400%.

This monumental amount of work was accomplished by Stewards mostly motorized volunteers in 2529 hours or 14 hours per mile. This leaves 69 miles of trails maintained by the Forest Service or other volunteers in 2015.

During the period from 2010 to 2015 Stewards of the Sequoia motorized volunteers spent 16,613 hours performing maintenance on 1360 miles of Sequoia National Forest Trails or about 13 hours per mile of trail maintained. By comparison non motorized trail maintenance took more than three times as long per mile. This points out how incredibly efficient using OHVs is for performing trail work as Stewards does, compared to any other means.

OUTCOME (NVUM-03)

In order to accurately address the need for sustainability based on best available data the EIS should be updated to disclose maintenance of motorized trails is far more sustainable than maintaining nonmotorized trails.

ISSUE (NVUM-04)

The SCENIC INTEGRITY Section (DEIS Vol I Page 466) states in detail the attributes of nonmotorized recreation, but nothing about motorized recreation. Considering this one is led to believe the EIS has been drafted with a preference for nonmotorized recreation. This is reinforced by the EIS not giving credit to the OHV Grant Program, or the push for more Wilderness, as well as the reduction of motorized recreation opportunity and other issues. Taken together this is a strong indication of a predetermined outcome.

OUTCOME (NVUM-04)

The EIS must be updated to include the Scenic Integrity attributes of motorized recreation in order for the public to know how it will be applied and to provide guidance for implementation.

No doubt many hundreds of thousands of people in the planning area who enjoy trail recreation think that seeing trails is a good thing.

The EIS must acknowledge that seeing trails (motorized or nonmotorized) is a positive attribute for many who enjoy both motorized and nonmotorized trails.

It is unclear which level of Scenic Integrity would allow for this.

We would suggest that many people would feel that meandering trails are part of the "valued scenery". In that case Very High Integrity could include semi primitive motorized areas. But the Forest Service DEIS has not explained if it does or not, and if it does not then why not, since no doubt many people who enjoy motorized trails would feel the Very High Integrity definition could easily apply to areas with motorized trails.

Lending additional credence to this point, the DEIS acknowledges that "*Forest Roads offer scenic views*" (DEIS Vol I Page 474). Considering one of the largest forms of recreation appears to be motorized use based on the Sequoia data, as explained elsewhere in this comment, how has the DEIS addressed the scenic needs and desires of this very large segment of their visitors? It appears it has not, instead seeking to apply a wilderness like preference in most cases.

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