

# STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3  
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January 24, 2014

Land Management Plan Revision  
US Forest Service, Ecosystem Planning Staff  
1323 Club Drive, Vallejo, CA 94592  
Via Email- R5planrevision@fs.fed.us

Re: Comment on LRMP Revision Need For Change

Dear Forest Land Planner,

Thank you for this opportunity to comment on the "Need For Change" regarding the Forest Land Resources Management Plan Revision.

Please read and consider the following and incorporate our suggestions into the "Need For Change", This letter has been cosigned by seventeen other organizations whose members enjoy lands managed by the Forest Service

## **NEED FOR CHANGE- Sustainable Recreation and Forest Health**

### **Importance to People**

There is one thing that everyone who enjoys National Forest lands needs and that is-Access. Driving on forest roads and trails is the main methods of access for all forms of recreation. Whether you are a hiker driving to the trailhead, a horseman towing stock to the trailhead, or a mountain biker driving to the trailhead, a fisherman driving to the creek, a kayaker driving to the put in or take out, a camper driving to your camping spot, an off roader, a rancher hauling stock, or forest staff managing forest lands- everyone uses roads and trails.

They are especially important to those with disabilities, since in many cases motorized or wheeled vehicles may be the only way for them to enjoy their public lands. The Americans with Disabilities Act was updated in 2011 to address the need for access for the disabled on public lands.

There is a high demand for motorized and mechanized recreation shared trails which have been the fastest growing forms of recreation. Together these two forms of recreation provide the largest economic impact and when driving for pleasure is included they are the most popular primary forms of recreation per the NVUM. The increasing trend toward adventure sports will likely add to the continued popularity of motorized and mechanized recreation.

The Agency has reported that spending by recreation visitors in areas within 50 miles of national forests and grasslands amounts to nearly \$13 billion each year. Those dollars sustain more than 224,000 full and part-time jobs. Recreation accounts for more than half of all job and income effects attributable to Forest Service programs.

### **Threats to Losing Benefits in the Short-Term: Current Situation and Trends**

While a demand analysis has not been done in any Forest in Region 5 for either motorized or mechanized recreation, the demand for the multiple use trails they enjoy has not diminished and will likely increase in future. Closures or restrictions that cause a reduction of existing multiple use trails will concentrate use and potentially increase environmental impacts, as well as increasing maintenance costs.

Through Wilderness and other designations a considerable amount of National Forest Lands has been closed to most forms of recreation other than horseback or hiking. In some Forests more than half the land has been closed to most forms of recreation. The remaining multiple use lands are where the majority of the public recreate and where off road vehicles use is allowed.

Existing trails/areas were generally not planned, designed, nor constructed for OHV activities. Many areas that provided for trails/areas did not incorporate enough miles or enough challenge to adequately accommodate the OHV user. This has contributed to OHV management problems by not dispersing the use and not providing the full spectrum of challenge levels (easy through most difficult). This practice often resulted in resource damage as a result of overuse and development of new trails that do not exist on inventory records.

Fixed date seasonal closures are not workable in some Forests because wet weather is unpredictable and most users' desire trail conditions following a rain when trails are firm and dust free. Negative effects from erosion can often be mitigated with proper trail design and special features such as trail hardening. Dry weather use when trails are dusty is limited because of the amount of hot safety gear and dust.

Environmental litigation has caused management by courts which have little or no expertise in managing public lands. This in turn has caused analysis paralysis where the Forest Service is forced to analyze and re-analyze in an almost endless loop that is cost prohibitive. The result is that few projects are implemented on the ground. Yet projects are needed to help promote forest health. Important projects include fuel load reduction and recreation management while allowing use to continue.

Nationally, Fire Suppression now consumes 41% of the entire Forest Service budget of which \$1 billion goes to fire preparedness. Having the necessary equipment available and hiring retaining the crews is extremely costly. The fire crews frequently play volleyball while they're on standby waiting for the fire bell to ring. This huge cost burden is taking much needed funding from recreation and forest health projects. Getting more fuel reduction projects implemented on the ground would improve forest health and fire resilience and reduce the need for huge standby fire crews. It would also provide income and a renewable product.

### **Ecological, Social and Economic Sustainability**

The Forest Service of the US Department of Agriculture is dedicated to the principle of multiple use management of the Nations forest resources for sustained yields of wood, water, forage, wildlife and recreation.

While funding has fallen short of that necessary to maintain existing trails in many National

Forests many grassroots motorized volunteer groups have stepped up and eliminated the deferred trail maintenance. In some cases the trails are in better condition than they have been for 30 years.

The multiple use trails maintained by volunteers provides great public benefit since they allow all forms of recreation. Money spent on multiple use trails and the efforts by motorized volunteers benefit everyone. Green Sticker funding from Off Road Vehicles provides the largest amount of funding to the Forest Service other than tax dollars. Dispersed recreation is less costly since no facilities need to be built or maintained. Loop trail opportunities should continue to be encouraged.

Recreation and tourism are vital to most rural economies. They depend on abundant access to National Forest Lands. Actions by public agencies to reduce or limit access to recreation on public lands have a direct and negative impact on the local economy. Limiting access by closing roads, campgrounds, RV parking, and trails negatively impact the surrounding communities.

Successful management of the OHV program is highly dependent upon a strong commitment by line officers and program managers. Without exception, in those areas where the Forest Service Review Team saw this commitment they also saw a successful program with less resource damage, more user enjoyment, and less public controversy. Where sufficient range of experience and challenge are provided, there was less indiscriminate cross-country travel and fewer enforcement problems.

The concept of Trail Capacity may be used to express the physical ability of a trail to withstand use or the rate at which a trail incurs wear that eventually results in the need for maintenance or replacement. "Trail Capacity" may also be used as an expression of the maximum number of recreationists that may use a given length of trail (usually one mile) in a given period of time (usually one day) and still meet user expectations for a particular type of wild land trail experience.

### **Current Management Direction: Opportunities for Change**

Forest plans should continue to encourage multiple use trail recreation and dispersed camping in order to continue to provide the public with this much desired opportunity and to provide for increased demand on National Forest Lands.

There has been too great a focus on environmental issues with little or no regard for the negative impacts to social and economic issues such as recreation trails. Abundant multiple use access to public lands provides a much needed opportunity for people to enjoy and connect with nature. To help achieve positive change to the current management direction we recommend the following:

- Update Recreation Opportunity Spectrum (ROS) so that multiple use land acreage remains at levels previously determined appropriate by the Forest Service in prior plans.
- Change ROS to reflect existing motorized and mechanized uses in areas that are not designated Wilderness in order to continue to provide multiple use recreation and prevent fragmentation of multiple use trail systems, as well as to prevent concentration of use with associated increased impacts. Changes to ROS can also help ensure that roads needed for management to reduce fire hazard and perform forest health projects are not closed.
- Fixed Date Season of use is not practical in southern or high desert Forests where the wet weather is extremely variable and unpredictable. Instead of Fixed Date Season of Use, blanket forest orders on specific trails where wet weather actually occurs and when wet weather is a real problem should be used. Instead of including a length of closure specify

in the order to reopen when wet weather has ended.

- Reroute trails as needed to allow for proper drainage to reduce erosion and rutting.
- Provide for adequate trail/area identification or construction to make up for trails/areas which have been closed to traditional OHV use through changes to zoning and wilderness designation.
- On-going OHV planning efforts are needed to address the current statewide planning issues, which include the need for long distance touring opportunities, and the need to connect riding areas in a coordinated statewide trail system, In some units the corridors have been identified and completed and in others planning is just beginning. There needs to be continued regional involvement in the process.
- Among the specific issues to address in the 2008 California Outdoor Recreation Plan was the need to develop more areas and opportunities for off-highway motorized recreation.
- Streamlining permits for local special events and recreational use will increase local economies and jobs
- Roads need to be kept open as fire breaks and access routes for fire fighting and forest health projects.
- Streamline environmental compliance: allow environmental review done under the California Environmental Quality Act (CEQA) to be used to meet the National Environmental Protection Act (NEPA) requirements where possible.
- Incorporate the concept of Trail Capacity to determine the need to build more trails in order to prevent impacts from overuse.
- Perform demand analysis for mechanized and motorized recreation.

Thank you for incorporating our suggestions into the “Need For Change”.

Sincerely,

Chris Horgan  
Executive Director  
Stewards of the Sequoia  
Division of CTUC 501c3 non profit  
[chris@stewardsofthesequoia.org](mailto:chris@stewardsofthesequoia.org)

*"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 2100 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

## COSIGNERS

|  |                                     |
|--|-------------------------------------|
| American Lands Access Association                          | Shirley Leeson, President           |
| Americans for Forest Access                                | Eddie Phillips, Chairman            |
| Azusa Canyon Offroad Association                           | Mike Bishop, President              |
| Back Country Horsemen of California Kern River Valley Unit | Mike Hughes, Public Lands Director  |
| Bakersfield Trailblazers                                   | Jon Aichele, Director of Land Use   |
| Chaparrals MC  | Mike Adams, Secretary               |
| California Trail Users Coalition                           | Ed Waldheim, President              |
| Kernville Chamber of Commerce                              | Cheryl Borthick, President          |
| Kern River Valley Chamber of Commerce                      | John Blythe, Board member           |
| Lake Isabella & Bodfish Property Owners Association        | Jon Ream, Vice President            |
| Lost Coyetes   | Jim Wilson, Vice President          |
| Orange County Dualies                                      | Jeff Fisher, President              |
| Recreation Outdoors Coalition                              | Sylvia Milligan, Executive Director |
| Santa Barbara Motorcycle Club                              | Jim Ciontea, President              |
| Sierra Access Coalition                                    | Corky Lazzarino, Executive Director |
| Southern Sierra Fat Tire Association                       | Ernest Garcia-Diaz, President       |
| Tule Gem & Mineral Society                                 | Bill Bingaman, President            |