

STEWARDS OF THE SEQUOIA

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September 26, 2019

US Forest Service
Forest Planner Fariba Hamedani
Forest Plan Revision
1839 So. Newcomb Street, Porterville, CA 93257

Via Email-r5planrevision@fs.fed.us

Re: Sequoia Forest Plan Revision Revised DEIS Comment

Dear Ms. Hamedani and Forest Planners,

Please read and consider our comments and use them to draft Alternatives in your Forest Plan Revision FEIS for the Sequoia National Forests, and as it may apply to all National Forests. While site specific comments are for the Sequoia, most if not all of the comments apply equally to the Sequoia, Sierra and Inyo Forests. This comment letter is cosigned by 34 local businesses, organizations, clubs, property owner associations and national organizations who share our concerns.

It is of note that Stewards and the cosigners perform more the vast majority of all trail maintenance, and a good portion of trash cleanup in the Sequoia National Forest. Making us not only stakeholders, but Forest Partners who roll up sleeves to help maintain our public lands.

Stewards of the Sequoia is the largest on the ground volunteer program in the Sequoia National Forest performing more than 80% of all trail maintenance in the Sequoia National Forest. Stewards are a multiple use organization whose 3500 members enjoy all forms of recreation. We have extensive knowledge of recreation conditions in the Forest. We understand what works for recreation and what does not. We know what the public wants and that is to keep existing multiple use trails open and expand and modify them to meet the increasing recreation needs of current and future generations. Yet the Sequoia DEIS and Revised DEIS seeks the opposite, to reduce and restrict multiple use trails contrary to the obvious need as documented in the RDEIS, and thereby harming the ability to provide sustainable recreation and hurting the local economies.

Stewards of the Sequoia were involved in the Sierra Cascades Dialogs almost a decade ago held in Sacramento to guide the direction of future Forest Planning. The Forest Service did not address Recreation at the those dialogs until a coalition of groups including Stewards, CORVA, Recreation Opportunity Coalition, Sierra Access Coalition and others petitioned the Forest Service to have a dialog

about Recreation. It was the largest and best attended dialog by far. The conclusion reached by each of the discussion groups at the Recreation Dialog was that the Forest Service had already closed too many multiple use roads and trails and needed to reverse the trend and that more multiple use roads and trails would be needed. Yet the current Revised Sequoia DEIS seeks to further restrict recreation making it unsustainable

Stewards of the Sequoia have also been engaged in the Sequoia Forest Planning process for the past five years. Sadly the Forest Service has addressed few if any of our written or verbal comments about recreation. When asked about our written comments planning staff have stated they had not read them or only read part of them, this is surely not the proper way to perform the planning process.

We are pleased the Forest Service recently hired a Recreation Planner but it is a bit late in the process as it is almost completed. We hope the Recreation Planner will be able to fully address public comments and stop this train wreck for recreation by implementing our current and past comments in the Final EIS plan alternatives.

We find both the Sequoia Forest Plan DEIS and Revised DEIS will-

- Increase restrictions on multiple use recreation such as mountain biking and motorized
- Harm the local economy
- Harm the environment by concentrating use
- Make recreation unsustainable

OUTCOME- We find the Sequoia Forest Plan Revision FEIS needs to incorporate the following three items in order to comply with regulations, law policy, recreation demand and be able to provide sustainable recreation. Justification for this is provided in this comment letter as well as our prior comment letters-

- 1. The FEIS needs to correct ROS inconsistencies for Sirretta Peak and Piute trail areas by making them Semi Primitive Motorized areas in keeping with historic designated motorized trails in these areas in all Alternatives.**
- 2. Remove the expansion of the PCT Corridor from all Alternatives in the FEIS**
- 3. Remove from the FEIS new Recreation Management Areas including the new Backcountry Management Area from all Alternatives and continue to utilize the existing proven Recreation Opportunity Spectrum.**

QUESTIONS- We ask the following questions in the hopes the Forest Service will address and answer them in the FEIS.

1. How will increasing restrictions and concentrating use on certain uses such as motorized or mountain bike by the creation of new recreation management areas be considered sustainable?
2. How does the Forest Plan EIS encourage projects to add multiple use trails to meet the increasing need for current and future generations?

3. How does Forest Plan EIS address the need to provide more motorized recreation trails in order to disperse trail use and to help recreation continue to be sustainable?
4. How does the Forest Plan EIS encourage motorized multiple use loop trails as generally required to by the Forest Service?
5. How does the Forest Plan EIS make meeting increasing demand for, and preserving public access to roads, trails and campgrounds a priority as it must be under the Multiple Use Act?
6. Why isn't the Mexico To Canada California State Wide Motorized Trail disclosed in the Forest Plan and the need to implement it to address increased demand?

Preserving public access and recreation opportunities should be a high priority for the Forest Service in every plan. The public should not have to attend planning meetings or submit comments arguing to keep existing recreation opportunities. Yet here we are yet again having to submit comments defending existing and future recreation opportunities. Additionally-

- Opportunities for the public to access and recreate on public lands must be viewed as a highly valued resource, a resource which needs to be safeguarded and preserved under the Forest Plan, just as environmental resources are currently safeguarded.
- If recreation opportunities are further restricted the Forest Plan should specify that the loss must be mitigated in-kind and the cost of the mitigation must fall to the agency mandating the change. Example; If the Forest Service closes roads, trails or campgrounds, the lost recreation opportunities (route miles, type, terrain, connectivity, etc.) must be replaced in-kind and the cost born by the Forest Service as mitigation.

KEY SUSTAINABLE RECREATION ISSUES

Sustainable recreation needs to address recreation demand and carrying capacity. Dispersing recreation is the cornerstone of what makes recreation sustainable. Recreation demand and public preferences, including preserving and increasing motorized recreation opportunity for current and future generations, must be part of the Forest Plan (FSM 1909.12 23.23a).

National Forest Lands are not a Preserve. They are multiple use lands providing "the greatest good".

National trends indicate rapid growth in OHV use, with the number of participants in OHV activities increasing by 8 million participants between 1982 and 1995 (Cordell and McKinney 1999), with a 16 percent increase projected nationally over the next 50 years (Bowker et al. 1999). We think the increase in Sequoia is even far greater percentage than the National trend, as indicated by the increasing use of local trails.

Motorized multiple use trails are open to everyone including non-motorized use. The Sequoia multiple use trails are in the best condition as they receive the most maintenance due to volunteerism and OHV dollars. Restricting motorized use of trails means volunteerism and OHV dollars on fewer trails to the detriment of everyone and is not in keeping with sustainable recreation.

Stewards of the Sequoia is the only organization with experience in maintaining and managing trails for all forms of recreation. Our comments draw from what we have that works and does not work.

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Forest Plan Violates 1982 PCT Comprehensive Management Plan

Multiple Use motorized management is the emphasis within motorized ROS. The Pacific Crest Trail footprint is a non-motorized trail that is allowed in the Piute Semi Primitive **Motorized** area. The PCT shares these public lands with other forms of recreation. Motorized recreation is the primary land use in the Piutes. The PCT should not be allowed to create defacto non-motorized areas beyond the trail itself in motorized ROS areas such as the Piutes.

The Forest Service foresaw the possibility of the PCT being used to expand non-motorized areas and restrict other forms of recreation. The 1982 PCT Comprehensive Management Plan (CMP) addressed these concerns by requiring the

1. PCT to be a good neighbor to other forms of recreation
2. PCT to coexist in harmony with other forms of lands use (recreation)
3. PCT being a multiple use experience
4. Removal of corridor language from the PCT CMP
5. Acknowledging the Forest Service would need to educate the public about the PCT multiple use experience including seeing logging, road building and off road vehicles.

- The Sequoia Forest Plan should be furthering the education of the public about the PCT being a multiple use experience.
 - The Sequoia Forest Plan should not be eliminating the PCT multiple use experience.
1. FSH 24.3 – Designated Area Plans. “The designated area authorities may require specific plans (such as wild and scenic river plans or national scenic and historic trail plans) for a designated area with additional requirements than those of the Planning Rule. The land management plans must also be compatible with these designated area plans (e.g. the PCT CMP) or either the land management plan or the designated area plan must be amended to achieve this compatibility.”
 - The creation or expansion of the PCT Corridor in the Sequoia Forest Plan would be in violation of a number of requirements under the 1982 PCT CMP such as the five listed above, and therefore the Sequoia Forest Plan would, not be compatible with, and in violation of FSH 24.3 (above). **If the Forest Service feels the need to create or expand the PCT Corridor they must amend the 1982 Pacific Crest Trail Comprehensive Management Plan, which is the primary management for the PCT.**
 2. The Forest “Plan components must be compatible with the objectives and practices identified in the comprehensive plan for the management of the national scenic and historic trail.” FSH 1909.12-24.43(1e).
 - Yet the Sequoia Forest Plan creating or expanding the PCT Corridor which restricts or closes existing in process historic motorized trails, would stop the PCT meeting the objectives of the 1982 PCT CMP such as coexisting in harmony with, or being a good neighbor to, this form of recreation. This would be a violation of above FSH 1909.12-24.43(1e).
 3. According to (FSH 1909.12-43(1a), the Sequoia Forest Plan must include National Scenic Trails (PCT) established rights-of-way pursuant to 16 U.S.C 1246(a)(2) and direction contained in comprehensive plans (CPs).
 - Considering 1982 PCT CMP stated that all language for PCT Corridors was to be removed, then there is no direction to create or expand a PCT Corridor.
 - However the 1982 PCT CMP does provide direction that the PCT must be a good neighbor to other forms of recreation and coexist in harmony with other land use and be a multiple use experience. The creation or expansion of the PCT Corridor would violate those requirements. It would not be keeping with the direction contained in comprehensive plans (CPs) (FSH 1909.12-43(1a)
 4. The creation or expansion of a PCT Corridor that restricts existing or future motorized use is in effect creating a restricted non-motorized area, which is not compatible with the existing Piute Semi Primitive **Motorized** ROS designated area (FSH 24.3) , or in harmony with the purpose for which the Semi Primitive **Motorized** area was designated. (FSH 1909.12-24.2(1b))
 - Likewise in regards to National Scenic Trails (PCT), the Forest Plan must consider other aspects of the plan such as recreational settings (ROS) and existing rights of way. (FSH 1909.12-24.43(1f)

5. We would also like to point out that the Piute Semi Primitive Motorized areas and 2010 Piute Travel Management NOI establish a right of way for all existing non system motorized trails in the area since the Travel Management Rule requires they remain open until the Piute Travel Plan analyzes them and either designates or closes them. Therefore the creation or expansion of a PCT Corridor that would close those in process non system trails would not provide for and manage those right of ways in violation of (FSH 1909.12-24.43(1a) and (1b) and FSH 1909.12-24.43(1f)
6. While FSH 1909.12-24.43(2f) says a Corridor "**May**" be created for a National Scenic trail. It does not require it. We hope the Forest Service can see a PCT Corridor is not appropriate for the many reasons we provide in this comment letter and others.
7. The Forest Plan is secondary to the 1982 PCT CMP. *"Each National Forest will integrate the direction and guidance provided by the Comprehensive Plan into their respective land management planning processes" Page 18 of 1982 PCT CMP.*
8. The National Trail System Act and 1982 PCT CMP (along with the EA that was prepared to adopt the 1982 PCT CMP) makes it very clear that multiple use activities are consistent with the nature and purposes of the PCT.
9. The Sequoia Forest Plan has not shown that historical OHV use near or crossing the PCT in the Piutes is having a negative effect on the required PCT multiple use experience that would require the creation or expansion of a PCT Corridor.

For the above reasons and others the Sequoia National Forest plan must ensure multiple use management is allowed surrounding and crossing the PCT outside of wildernesses and parks. In the case of the Piutes the Sequoia National Forest plan must ensure this area is continued to be managed as a motorized emphasis area and motorized ROS. and that the existing in process non system Piute motorized trails are not closed at this time.

Making The Pacific Crest Trail a Bad Neighbor To Other Forms Of Recreation

The Forest Service claims they need to expand the PCT Corridor by as much as one mile wide, in order to supposedly "protect" the character of the Pacific Crest Trail.

However the Pacific Crest Trail Association Southern Sierra Regional Representative Ben Barry, has stated a different purpose of the PCT Corridor. The PCTA claims it is to keep mountain bikes and dirt bikes and other motorized vehicles use further away from the PCT.

- Yet according to the 1982 PCT Comprehensive Management Plan the PCT character must be a multiple use experience. The wider proposed PCT Corridor will prevent this.
- There appears to be no problem with the PCT continuing to coexist with other forms of nearby recreation in the Piutes. That being the case what justifies expanding the PCT Corridor and restricting other forms of recreation.

- Shouldn't the Forest Service seek the smallest amount of restriction such as the existing 116 acre 30 feet wide PCT Corridor for at least their preferred Alternative B. Instead the Forest Service is seeking to increase the PCT Corridor by 105 times in Alternative B and far more in other Alternatives.
- There are PCT Corridor acres in the Alt A No Action indicating the PCT Corridor already exists. That being the case we wonder at the Forest Service prior claims that a PCT Corridor needed to be created in order to meet the Forest Planning Rule desire for a Corridor. We would argue the existing 116 acre PCT Corridor satisfies any desire to have a Corridor.
- Yet the PCT is required to be a good neighbor to other forms of recreation and coexist in harmony with other land uses, per Page 21 of their 1982 PCT Comprehensive Management Plan.
- And the vast majority of PCT hiker surveyed felt there is no problem with seeing or hearing or sharing public lands with motorized trail users near and crossing the PCT.¹

Either way the creation of an expanded PCT Corridor up to one mile wide would be in direct violation of the 1982 PCT Comprehensive Management Plan. That PCT management plan is the ultimate guiding document for PCT management, created by the Secretary of Agriculture at the direction of Congress, who oversee the Forest Service. Thus the 1982 PCT Comprehensive Management Plan is a higher level planning document to any local Forest Plan, such as the Sequoia Forest Plan. Any changes to PCT management, such as a one mile or other PCT corridor, must be done by amending the 1982 PCT Comprehensive Management Plan, not through Forest Plan Revisions of 25 different National Forest Plans through which the PCT travels. Furthermore for the Forest Service to presume to do so suggests a predetermined outcome to Forest Planning which would be inappropriate.

Perhaps most important of all is that it is violation of the 1982 PCT Management plan to harm other forms of recreation and eliminate the only place left in Sequoia, Inyo and Sierra National Forests where the PCT is still a multiple use experience as it is required to be.

1. The Forest should not expand the No Action existing 116 acre PCT Corridor in any Alternatives, or as it has by 400 times (46,384 acres) as it has done in other DEIS Alternatives.
2. The Forest Service should include the No Action existing 116 acre trail width PCT Corridor in all of the Sequoia Forest Plan Alternatives, for the above and other reasons provided in this comment letter.

The PCT is required to be located no closer than a half mile from roads better then primitive (CMP page 18). However the PCT is currently closer than a half mile from both Piute Mountain Road and Jawbone Canyon Road. Rather than moving the roads, the PCT should be relocated out of the area so that it will conform to the 1982 PCT CMP. Likewise rather than close or restrict the motorized trails in the Piutes, the PCT should be relocated out of the Piutes so it is not near any motorized trails if that is what the Forest Service wishes.

¹ Kern County Sheriff, *Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report 10/18/16*

Exceeding PCT Carrying Capacity

The 1982 PCT Comprehensive Management Plan established the carrying capacity for each segment of the PCT, including the 7 mile Piute segment of the PCT to protect the "quality of the (PCT) recreation experience". Has this Piute PCT capacity of 42 people at one time (PAOT) been exceeded in violation of the PCT CMP?

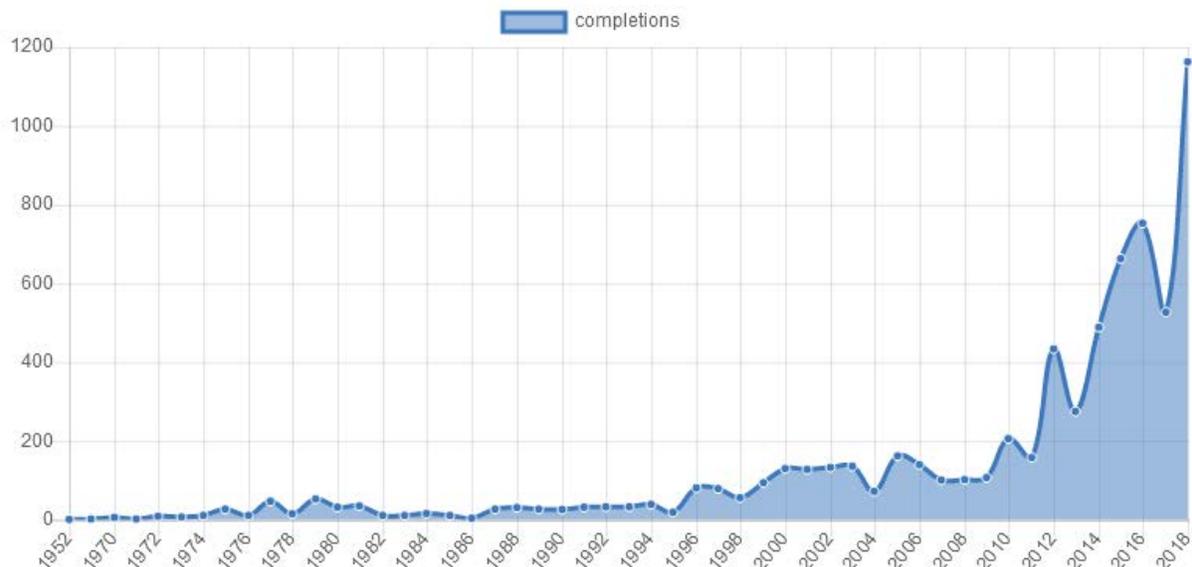
Piute PCT Carrying Capacity from 1982 PCT CMP (page 18) PAOT is "people at one time"

On the Piutes segment, an Experience Level III segment, the same rationale is applicable, except that a greater number of daily encounters is acceptable. Assuming that the "tolerance" level of backpackers is twice the encounters they prefer, than a capacity of one group per each three quarters of a mile seems acceptable. While the overnight capacity on this segment is a maximum of 15 packpackers at Mace Camp and 15 equestrians at Weldon Camp, the capacity of the trail allows for an additional day-use limit of 12 PAOT. The Piute segment capacity is shown as follows:

Piute Segment	- 7 miles: 42 PAOT
Backpacking overnight capacity	- 15 PAOT
Equestrian overnight capacity	- 15 PAOT
Day use	- 12 PAOT

It seems likely the carrying capacity has been exceeded based on the Forest Service and PCTA claims of large recent increases in PCT usage (below).

- The Forest Service has done nothing to ensure carrying capacity is not exceeded. What is the Forest Service doing to limit use to within the carrying capacity? Reducing permits?
- The Forest Plan should address the need to keep PCT use within established carrying capacity.



**Since 2010 PCT completions have dramatically increased by 1200% according to PCTA website (above)
Would this indicate PCT Carrying Capacity is being exceeded?**

Harming World Class Piute OHV Trail System

The PCT is about 86 miles long within the three Forest Planning area of Sequoia/Sierra/Inyo National Forests. Virtually the entire trail is in designated Wilderness which already provides a very large protected and exclusive use area for the PCT. The only place where expanding the PCT Corridor restricting other forms of recreation would make any real difference is the 10 miles where the PCT already coexists with the world class Piute OHV trail network.

The Piute trail network is a world class destination motorized trail system. Most likely the only remaining contiguous single track motorized trail system left in California. Many feel the Piutes are without doubt the best motorized trail system in California.

A PCT Corridor up to one mile wide would cut a swath through the middle of the Piute OHV trail system. Decimating the Landers OHV staging area loop trail system and destroying overall Sorrell Valley OHV trail integrity and eliminating roughly 60 miles of Piute OHV loops through the closure of at least 30 miles of existing historic motorized trails shown below from the Piute Travel Management NOI Map and Piute Trail Plan List 2006.

U00015 Alternate Trail	U00114 Jawbone Trail
U00045 Roadrunner Trail	U00020 Saddle Trail
U00037 Stubbs Trail	U00111 Sorrel Peak Trail
U00145 Mouse Trail	U00048 Sorrel Peak Trail
U00220 Stubbs Trail	U00054 Jawbone Trail
U00010 Squirrel Trail	U00051 Sorrel Peak Trail
U00312 Jawbone Trail	U00030 Jawbone Trail
U00012 Saddle Trail	

SEE MAP NEXT PAGE

To close these OHV trails now under the Forest Plan Revision by expanding the PCT Corridor would be a violation of Travel Management Planning and a most despicable violation of public trust for those who enjoy the Piute OHV trails, as well as those who have invested 15 years working with the Forest Service on the Piute OHV Travel Plan.

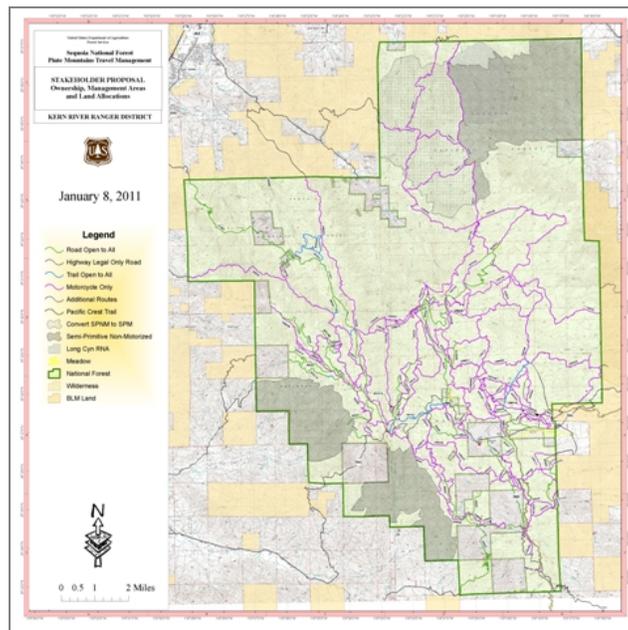
Closure of the Piute non system trails would require more detailed and site specific analysis which can only be done through the completion of the Piute Travel Management. Closure of Piute non system trails, which are part of the ongoing and initial Piute travel management process is beyond the scope of a Forest Plan.

The Piute OHV trails all continue to be legally open to motorized use since the Forest Service has not completed the Piute Travel Management. We have provided documentation about the flawed Piute MVUM to the Forest Service staff on several occasions in our Power Point.

<http://stewardsofthesequoia.org/PDFs/FlawedMVUM.pdf>

The proposed PCT Corridor would close existing historic Piute motorized trails which are currently under consideration for designation and concentrate motorized trails use contrary to the known need to avoid concentrating use and would fail to meet the current need for motorized recreation making the Piute OHV trails unsustainable.

Forest Planning is not allowed to effect travel management or site specific trails (FSM 1909.12 Chapter 20). However the proposed PCT Corridor would affect the site specific PCT trail, as well as the ongoing Piute OHV Travel Management Plan, by closing routes shown on the 2010 Piute NOI (below) in violation of Forest Planning.



2010 Piute NOI map of existing historic motorized trails

- The Piutes are an OHV primary management area, or if they are not then this Forest Plan should designate it as one due to the large amount of OHV trails in the Piutes.
- The designated Landers Camp Piute OHV staging area falls within the proposed PCT Corridor making the proposed Corridor most inappropriate.
- The PCT Corridor would not harmonize and compliment the Piute OHV trails which are in process of designation, and would violate the 1982 PCT Comprehensive Plan under which the PCT is required to be managed.

The Forest Service is required to use science to drive planning. Yet clearly science tells us that widespread closure of existing trails in a popular destination OHV trail system like the Piutes is a bad idea that will result in increased impacts and user dissatisfaction.

Plan Harms The Economy and Sustainability

The Forest Plan DEIS claims Alternative C and E will have "*some long-term beneficial effects on the sustainability of economic conditions in local communities*" (Page 63), but provides few specifics of how it will do this.

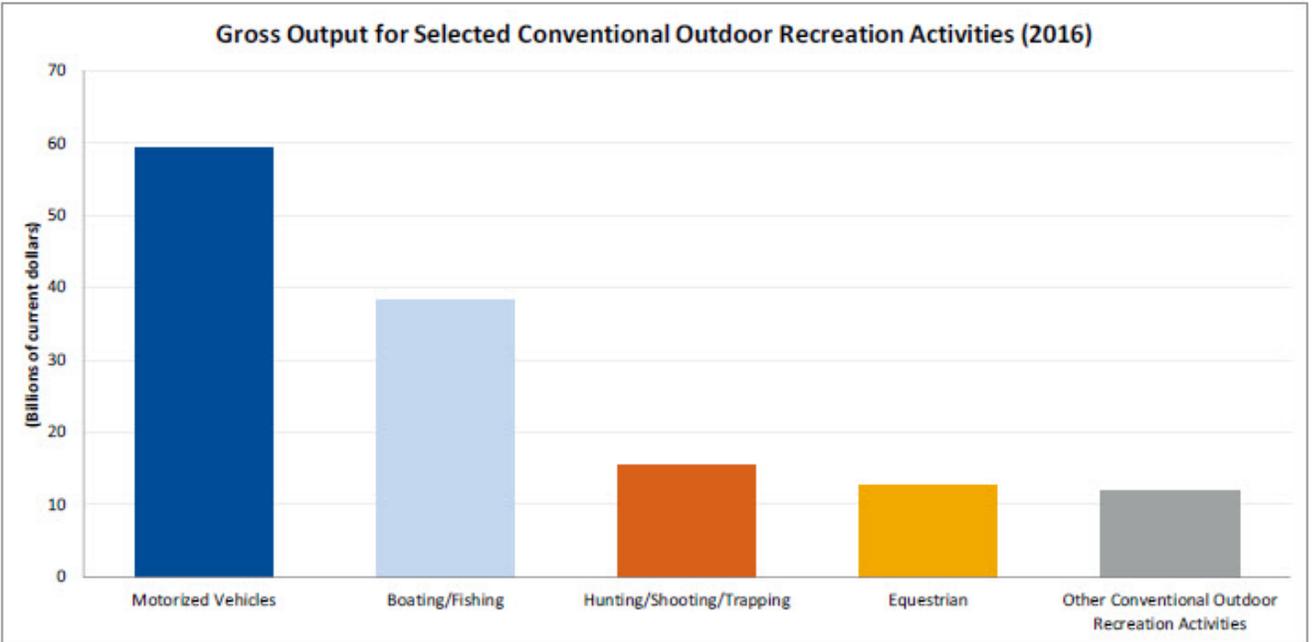
From a recreation perspective we find the opposite to be true. That Alternative C and E would be the MOST harmful to the local economy, as they have the most acres of restrictive designations, such as largest PCT Corridor and others, and the least amount of multiple use acres. From this we can only conclude that Forest Staff are placing a greater value on non-mechanized recreation. Yet that is not in keeping with the needs and desires of the public who recreate in Sequoia. The plan should weight all forms of recreation equally, and seek to preserve all forms of recreation in order to benefit the economy.

We would hope each Alternative would increase sustainability and help the economy. Instead we find every Alternative, except the No Action Alternative, will harm sustainable recreation and the recreation economy. For example-

1. Motorized recreation is by far the largest economic form of recreation^{2, 3}. Local businesses also cite motorized recreation as a very large income generator for them.

² Outdoor Recreation Satellite Account: Prototype Statistics for 2012-2016, Bureau of Economic Analysis

³ The Outdoor Recreation Economy, Outdoor Industry Association 2012



2. The closure of 30 miles of trails in the Piutes due to the creation of a PCT Corridor will decimate the trail system and harm the economy.
3. Actions by public agencies to reduce or limit access to recreation on public lands have a direct impact on the local economy. Limiting access by closing roads, campgrounds, RV parking, and trails impact the surrounding communities. RECREATION AND TOURISM ARE VITAL TO MOST RURAL COMMUNITIES: This is true for virtually all rural communities but especially important to counties with high percentages of public land.⁴
4. The creation of Backcountry Management Areas will prevent the expansion of mountain bike and motorized trails systems needed for future generations.
5. The creation of recommended Wilderness will take away from multiple use lands where the majority of the public recreate. Few people recreate in Wilderness in Sequoia and spend far less in local communities than any other form of recreation.

The "Greatest Good" Is Not Being Served

The Forest Service has not performed much needed recreation demand studies. However anecdotal evidence suggests the PCT has very little annual use in the Piutes due to little water, large elevation gains, hot weather, poor scenery and short season. The majority of PCT users on this poor stretch of the PCT are those who intend to thru hike the whole trail for which a PCT permit is required.

⁴ Jobs, Economic Development and Sustainable Communities, Humiston 2010, USDA Rural Development

We understand about 1400 thru hiker PCT permits were given out in 2014 ⁵. Even if all of them hiked the Piute section (locals in the Piutes see a few hundred at best each year). This pales in comparison to the thousands of Piute OHV trail users each year. Also consider most of the Piute trail users are repeat visitors, whereas the PCT users are primarily one time visitors.

- The Forest Service mandate is to "provide the greatest good".
- The PCT is doing fine without an expanded corridor.
- Clearly harming recreation opportunities of "many" in deference for the perceived benefit of a "few" PCT users is not for the "greatest good".

Majority of PCT users Oppose PCT Corridor

The PCT Corridor is a solution without a problem. It turns out the majority of PCT users have little or no issue with sharing their public lands with other Forest uses including motorized trails users.

Kern County Sheriff performed a two year investigation including receiving 490 written surveys, where 89% of PCT users stated that "seeing or hearing motorized trail bikes near the PCT did not detract from their PCT experience".

The investigation was in response to allegations by ORV Watch that OHV's were trespassing on the PCT in the Sequoia National Forest in greater numbers and causing irreparable harm to the trail. The Sheriff's report determined the **allegations "were unfounded"**. Forest Service field surveys have found **no OHV trespass on the PCT**. This indicates there is no justification for restricting OHV trails near or crossing the PCT.

During the investigation the Sherriff Deputies interviewed 40 PCT users, who when asked about problems with motorized trespass and noise near the PCT made statements such as "It does not seem to be a problem" and "It's probably fabricated or something. It doesn't make sense." (Kern County Sheriff Memorandum Report 6/12/14)

The Sheriff report concluded-

"It is clear that the vast majority of Pacific Crest Trail hikers and off-highway vehicle recreationists coexist harmoniously and peacefully. During the many in-person contacts with Pacific Crest Trail hikers, it was far more common for deputies to hear them express wonder and amazement at seeing motorcycles traversing a trail on a nearby hill than it was to hear expressions of dissatisfaction with having to share the environment with them. In many cases, the hikers expressed gratitude toward the off-highway vehicle recreationists for their offers of food and water. The survey responses from the legitimate users of the Pacific Crest Trail, the hikers, also support this conclusion." (Kern County Sheriff, Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report 10/18/16)

⁵ Kern County Sheriff, Pacific Crest Trail OHV Trespass Investigation and Hiker Survey Report 10/18/16

PCT is a Multiple Use Experience

The vast majority of Piute PCT users have no desire for a PCT Corridor harming other forms of recreation on public lands. However the Pacific Crest Trail Association (PCTA) has stated their goal is to make the PCT, as much as possible, a "Wilderness experience".

In many areas near Sequoia National Forest the PCT is located on dirt roads and private lands making it impossible for the PCT to be a "Wilderness experience".

The PCTA has also stated on their website that the Piute Travel Management NOI is unacceptable. Clearly the creation of a PCT Corridor would further the PCTA agenda of making the trail a Wilderness experience and eliminating many existing Piute motorized trails, but without having to fight to close the motorized trails, or go through Congress for Wilderness designation. This is an abuse of the Forest Planning process. Add to that the PCT is required to be a multiple use experience, making the "PCT Corridor" as proposed in Draft Alternatives B, C, D and E and the PCT Corridor, a travesty of Forest Planning.

PCT Search and Rescue Hampered

Kern County Search and Rescue, as well as Kern County Sheriff have complained to the Forest Service of the increasing number of PCT users in need of rescue and increasing deaths of PCT users. Most PCT rescues are possible due to rescuers being able to gain access to the PCT via motorized routes near the victim's location.

Clearly a PCT Corridor would -

- Seriously hamper Search and Rescue efforts to recover PCT victims
- Increase the time to get to PCT victims
- Likely increase the seriousness of PCT injuries and deaths due to longer rescue response times
- Increase the cost of PCT rescues
- Reduce the number of PCT calls that Search and Rescue could respond to due to lack of resources

No Need For Duplicate Recreation Management Areas

The Recreation Opportunity Spectrum has been widely used for more than 30 years to manage our National Forests and around the world.⁶

The Recreation Opportunity Spectrum (ROS) has two levels which are -

1. The "Setting"
2. The "Type of Recreation"

ROS defines the "Setting" as -

- Rural
- Roaded
- Semi Primitive
- Primitive

ROS defines the "Type of Recreation" -

- Motorized
- Non-Motorized

This is more than adequate for the Forest Service to continue to clearly identify what the recreation emphasis will be in all areas of the Sequoia National Forest.

Just because the 2012 Forest Planning Rule says there will be "management areas" in each Forest Plan does not require new management areas/definitions be created. The Forest Service already has management areas in the form of Recreation Opportunity Spectrum

The Revised DEIS seeks to create other recreation designations called Recreation Management Areas (RMA) and Backcountry Management Areas (BMA's).

- These would create another level of recreation designation, which is unnecessary since the ROS already establishes the type of recreation in each area of the forest. It could also be conflicting since the new RMA do not necessarily correspond to the existing ROS.
- For example the Backcountry Management Area would prohibit new mountain bike or motorized trails. Yet the EIS acknowledges the need to avoid concentrating use and the need for more trails for a growing population. With over 27% of the Sequoia already designated Wilderness where mountain biking and motorized use are prohibited, we should not further restrict those uses in the remaining non Wilderness lands. But that is exactly what the Backcountry Management Area proposes to do.
- The new Recreation Management Area designation would no doubt make it even more difficult for future trail projects. After all the Forest Service is unable to do any new trails projects now

⁶ Use of the Recreation Opportunity Spectrum in Natural Protected Area Planning and Management *Gustavo Perez-Verdin, Martha E. Lee, and Deborah J. Chavez*

without having to address and comply with newly restrictive Recreation Management Area or Backcountry Management Areas designations.

- There appears to be intent by the Forest Service to use them in every individual Forest Plan. That being the case they should have been developed in a National rulemaking process, such as the 2012 Forest Planning Rule, but they were not and are therefore invalid. Also these new Recreation Management Areas were not mentioned in Sequoia Forest Plan scoping and were not developed with public input in violation of NEPA.

We submitted a comment letter last year dated 8/20/2018 with 41 organizations cosigned objecting to the RMA's and BMA's for many reasons. They should be removed from all EIS alternatives since they are invalid and would harm sustainable recreation and are unnecessary duplication of existing ROS.

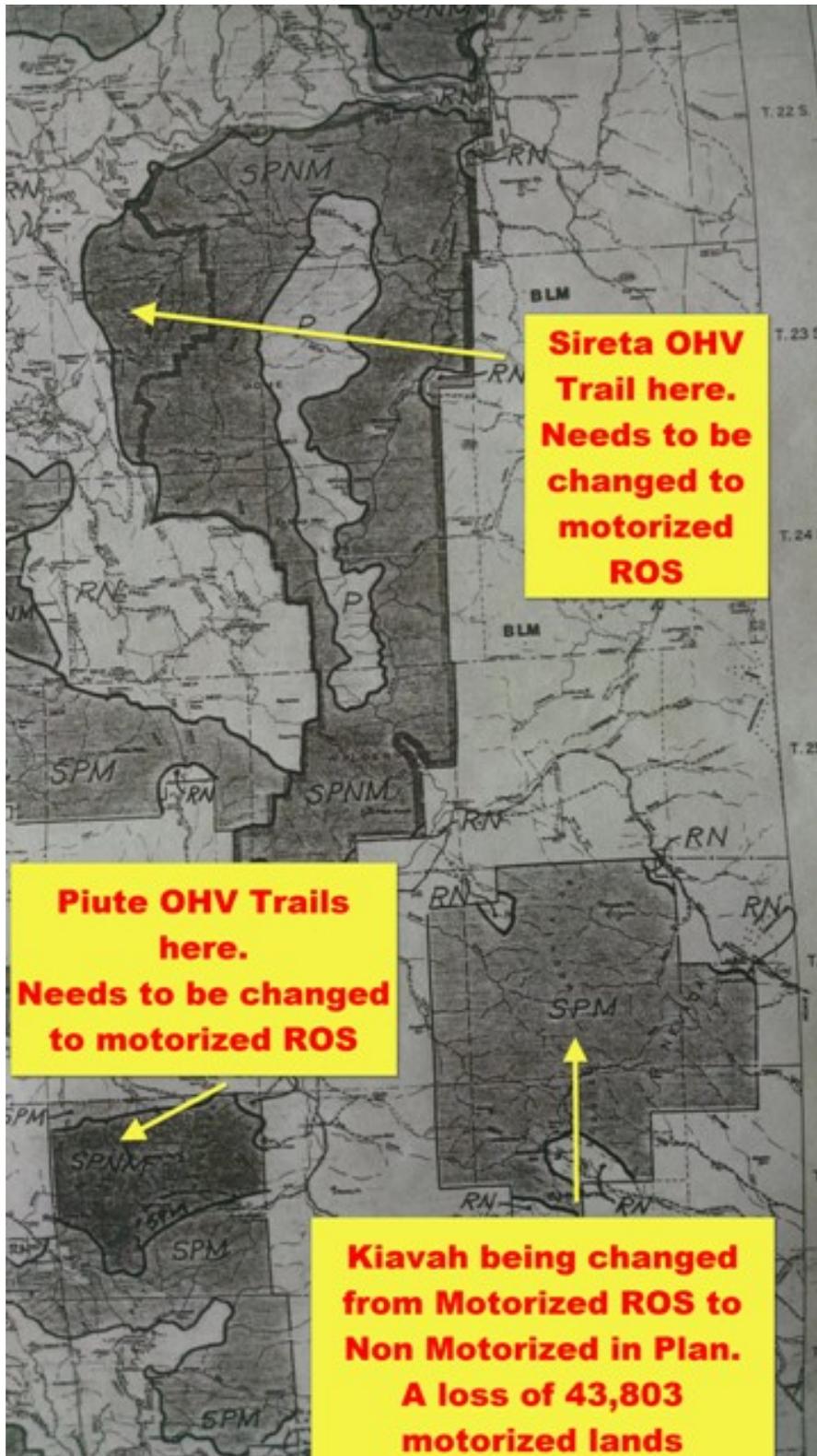
Recreation Opportunity Spectrum Out Of Balance

The creation of the Kiavah Wilderness took away 43,803 acres of Semi Primitive Motorized ROS lands and made them non motorized without adjusting the motorized ROS elsewhere to make up for this huge loss. Yet the demand for motorized recreation is increasing.

- There are existing designated motorized Forest Service system motorized trails within non motorized ROS areas such as Long Canyon 34E40, Willow Gulch 34E41, Little Dry 32E52, Dry Meadow 34E31 trails and Siretta Trail 34E12.
- The Forest Plan is required to address the ROS and correct ROS inconsistencies. (FSM 1926.15)
- The existence of these historic designated OHV trails means the ROS designation should be changed to motorized in these areas.
- 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).

The FEIS must correct ROS inconsistencies for Sirretta Peak and Piute trail areas by making them Semi Primitive Motorized areas, just as it did for the Kiavah Wilderness by making it non-motorized.

SEE MAP NEXT PAGE



Changes need to be made to Current Sequoia Recreation Opportunity Spectrum from 1988 Forest Plan

Encourage Loop Trails and Wider Spectrum of Alternatives

There are more than 70 miles of motorized loop trails that were inadvertently cut or closed off by past arbitrary Wilderness designations on the Rincon, Schaeffer, Rattlesnake and Moonachie trails.

On 7/13/15 Stewards of the Sequoia submitted a proposal for three minor Wilderness boundary adjustments of 42 acres, 750 acres and 1465 acres. This would restore roughly 5 miles of multiple use trails, which would reconnect more than 70 miles of loop trails and bring the Wilderness boundaries in compliance with FSM 1909.12, improve access to Wilderness, as well as many other benefits described in our proposal.

- The adjustment of Wilderness boundaries is within the scope of the Forest Plan. Yet the Forest Service has ignored our proposal.
- Our Wilderness boundary adjustment proposal must be included in the alternatives. This would provide a wider range of alternatives and address the Forest Service requirement to encourage loop trails.
- Please see our attached 7/13/15 Wilderness Evaluation boundary adjustment recommendations for specific information about the boundary adjustments.

More Than Enough Wilderness

Currently 54% of the Sequoia National Forest is already designated as Monument ((27%) and Wilderness (27%) where motorized single track trails are prohibited. Perhaps as little as 1% of recreation takes place in Sequoia Wilderness due to the difficulty of access, lack of water and large elevation gains. We need to preserve all remaining multiple use lands where 99% of people recreate in order to disperse use, reduce impacts and provide sustainable recreation.

New Forest Service lands are not being created. If the Forest Service recommends any Wilderness those lands will be taken away from multiple use.

- No new Wilderness recommendations should be made.
- Sequoia National Forest lands lack Wilderness Character due to military overflights, being changed by long term mining, grazing, and logging.
- The recommendation of Wilderness would increase maintenance backlogs since existing Wilderness trails cannot be maintained due to the prohibition of mechanized tools. Most trails in Golden Trout and Domelands are completely brushed over due to non-maintenance as a result of mechanized equipment bans in wilderness. Wilderness areas in the Sequoia are becoming completely inaccessible by humans.
- Old horse trails which are now used by mountain bike and dirt bikes need modernization and realignment to be environmentally compatible and recreationally sustainable. The designation of more Wilderness or Cherry Stemming disallows this.

- Why is it appropriate to have Semi Primitive Non-Motorized (SPNM) lands outside of the many existing designated non-motorized areas, such as 54% of the Sequoia in Wilderness or other non-motorized designation?
- We already have enough non-motorized areas and they are the best of the best lands too.
- Considering SPNM does not preclude motorized use what is the point of SPNM now?

There are currently about eight SPNM non motorized areas made up of more than 40,000 acres outside of Wilderness in the Sequoia National Forest. Those areas should be changed to Semi Primitive Motorized to allow for needed use for future generations.

Other Issues

We understand that you and some of your staff are new to the project and are only now reading our past comments some cosigned by up to 51 organizations, which were supposed to have been addressed in the DEIS but were not.

We are therefore resubmitting our prior comments so that they can be addressed in the EIS now.

1. Forest Plan Revision Comment for Sequoia, Sierra and Inyo 9/29/14
2. Wilderness Analysis Comment 6/9/15
3. Wilderness Evaluation boundary adjustment recommendations 7/13/15
4. Concerns with Changes to PCT Management in Forest Plan Revision 11/5/15
5. Draft Wilderness Evaluation Narrative Comments 2/1/16
6. Comment on Sequoia, Sierra, Inyo DEIS/DRLMP 8/25/16
7. Tiering of Forest Plan Regarding Pacific Crest Trail for Sequoia, Sierra and Inyo 8/5/18
8. Objection to more Wilderness and Backcountry Management Areas 8/20/18

We expect to see responses to each item we raised in these letters in the FEIS.

Thank you for this opportunity to help shape the Sequoia Forest Plan.

Sincerely,

Chris Horgan
 Executive Director
 Stewards of the Sequoia
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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 3800 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 3500 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"

Promoting Responsible Recreation & Environmental Stewardship