

STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3
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January 31, 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,

As requested we provide the following comments to augment our prior comments on the Need To Change. Please read them and incorporate them into the Need to Change document. We also have included points for inclusion in the Roles and Contribution document.

It would be well advised for the forest plan document to remain flexible and avoid absolutes like the word critical regarding conditions on forest lands unless the subject is firmly based in absolute accepted confirmed science.

Increase Opportunity

There has been a trend towards restricting access by closing roads and trails such as closing almost two thousand miles of routes in the three forest region recently. This reduction of recreation opportunities may cause increased overuse in other areas. There is a need to change by providing more roads and trails in order to handle the increased demand of future population growth. Also there is a need to support growing demand for recreation access to public lands and maintain diversity of recreation opportunities promoting a multiple use philosophy.

Change Condor Restriction Implementation

There have been large scale closures to the public due to possible Condor habitat, especially in the Evans Flat area of the Sequoia. Yet the electronic tracking history show that Condors tend to congregate in populated areas, not in remote areas like Evans Flat. There is a need to change the Condor restrictions. Possible habitat or roosting areas for Condors should not require any restriction of the public or closures of roads or trails.

When this was brought up at meeting held by the California Condor Conservation organization at the Sequoia Forest office it turned out they were not aware of and do not feel broad scale restriction of public access due to habitat or roosting sites are necessary.

Eliminate Fixed Date Wet Weather Closures

Fixed Date Wet Weather Closures make no sense when there is no wet weather. The last two winters (2013 & 2014) we have had the best weather conditions, less dust and typically the lowest

risk of fire for the public to enjoy many roads and trails, but they cannot due to fixed date wet weather closures which were implemented on January first.

It is possible emergency summer closures due to drought conditions may be implemented this season. If that happens the public will have been prohibited from enjoying many areas due to fixed date wet weather closures even though there was no wet weather and then prohibited from the same areas due to drought conditions.

Some staff say the fixed date closures save money by allowing dumpsters to be locked. However the types of people who enjoy these areas in the winter off season are not the types to need garbage services. Off season winter visitors on roads and trails need very little services since they are far fewer in number than those in summer. Other staffers say the cost savings is really quite minimal. Regardless funding should not be a justification for wet weather closures. If closures are implemented due to funding then they should have been represented as such to the public for comment prior to creation of this policy.

There is a need to change by eliminating the fixed date wet weather closures and going back to the close as needed due to wet weather in order to provide the forest with the flexibility they need to allow public access when there is no wet weather.

Desired Conditions

It has been asked whether Desired Conditions for Vegetation, Resilience, Fire and Wildlife on Forest Lands should be broad or specific. Nature is ever changing. A meadow was once a lake and may become a brush field and then a forest over time. We do not think it is possible to create a fixed specific desired condition for nature. We feel that broad desired conditions descriptions are best and will allow staff to be more flexible, as well as limiting litigation that might be based on not adhering to some arbitrary specific desired condition.

The creation of too specific criteria even if well intended typically results in unintended and unforeseen negative consequences.

There is a desired condition for more class one semi primitive motorized trails offering a variety of challenge, loop options and where all forms of recreation are dispersed so that encounters are rare and use is dispersed on a system large enough so that trail class and objectives such as trail width are maintained.

There is a desired condition where multiple use trails including motorized use would be allowed in more scenic areas. The current trend is for motorized multiple use trails to be in areas with less scenic value than is currently available in the Sequoia National Forest.

There is a desired condition to proactively maintain routes in their desired conditions based on trail management objectives to avoid trail proliferation on both motorized and non motorized routes.

Increase Grazing

Grazing provides many benefits such as fuel reduction, soil aeration and fertilizing, as well as producing a needed product, providing jobs and paying taxes. However there has been a trend to reduce the number of cattle allowed per acre often to the point where it is no longer cost effective for the rancher. These reductions are often far beyond what is needed to prevent over grazing or other impacts. There is a need to change the forest plan by increasing the animal unit months (AUM) to more realistic levels. This will allow this historical and important rural economic activity

to continue.

For Roles & Contributions

The below sections need to be added to the Sequoia Roles and Contributions document where noted or where appropriate in the final document. In many cases these points would also be appropriate for Sierra and Inyo documents-

1. World Class single track forest trail system (to first paragraph)
2. The fourth paragraph states; *"This varied landscape is critical in supporting biological diversity in the western United States"* This statement is likely not supported by science and will not allow for the flexibility that will be needed to implement a range of much needed projects in future. The concept of "critical in supporting" may lead to further litigation and analysis paralysis. Both of which were supposed to be reduced under forest plans created under the new planning rule. Changing the wording slightly would be well advised to something more reasonable so the statement would read; *This varied landscape is part of the biological diversity in the western United States.*
3. Likewise the statement in the same fourth paragraph should read; *"The forest's terrestrial and aquatic plant and animal species, and the resulting biodiversity contribute to resilient and healthy forest ecosystems upon which all social and economic contributions depend."* Where the word "contribute" has replaced the word "critical". Clearly the biodiversity has changed in the past without degradation of forest ecosystems and forest health, so it is not critical but it does contribute. Without this change the statement elevates some form of ecosystem above all social and economic considerations and apparently without any scientific basis.
4. It would be well advised for the forest plan document to remain flexible and avoid absolutes like the word critical unless the subject is firmly based in absolute accepted confirmed science.
5. Change statement in paragraph six to read; *The resulting tourism from recreation opportunities in the forest is vital to the economic stability of some local communities.* Where the word vital has replaced the word contribute in keeping with the USDA rural California economies study
6. Add the following at the end of seventh paragraph; *..., although demand remains very limited for these areas as evidenced by low visitation numbers compared to non wilderness lands in Sequoia.*
7. Thirty two percent of the Sequoia National Forest or 353,000 Acres (please check numbers) are managed as the Sequoia National Monument with special criteria and a separate plan focusing on non motorized activities. (insert the above after seventh paragraph)
8. The Sequoia National Forest has acres? or percentage? (please insert numbers) set aside as Wild & Scenic River sections to provide additional areas for solitude in river settings. (insert the above after prior paragraph)
9. About 224,651 acres or 20% of the Sequoia National Forest are designated as Roadless Areas where roads are not allowed and forest health management is extremely limited. (insert the above after prior paragraph)
10. The remaining multiple use lands make up 209,000 acres or 19% (please check these numbers) of the Sequoia National Forest, where the majority of the public recreate and where the full spectrum of recreation opportunities are allowed. These lands are predominantly where active management to promote forest health is performed. (insert the above after prior paragraph)
11. Sequoia National Forest multiple use trails provide many benefits to the public such as-
Personal: Improved mental well being; greater self-reliance; improved skills for outdoor enjoyment, testing personal endurance and enjoying risk-taking adventures.

- Community: Heightened sense of satisfaction with the community
Economic: Improved local economic stability; maintenance of community's distinctive recreation tourism market
Environmental: Increased awareness and protection of natural landscapes; reduced negative human impacts such as litter, vegetative trampling and unplanned trails
12. The Sequoia National Forest provides volunteer opportunities to community organizations like Stewards of the Sequoia whose mainly motorized members perform maintenance on 200 miles of forest routes each year learning tread lightly and maintenance techniques as well as educating the public while helping overcome Forest budget shortfalls and keeping trails enjoyable for all.
 13. In the past resource harvesting in the form of timber and fuel reduction historically provided or paid for recreation programs, campgrounds, roads and trails, which today we lack the funding to maintain with tax dollars. If litigation could be avoided timber receipts and forest health projects could once again be tapped into to provide much needed recreation program support.
 14. Erosion rates have increased dramatically in Sequoia National Forest with the increase in larger hotter stand replacing wildfires. Planned fuel reduction or timber projects results in lower long-term erosion rates than experienced following wildfires, which are inevitable if fuel loads are not reduced. The current fire management situation in many of our National Forests, from the standpoint of natural resources, community welfare, economics and general stewardship is unsustainable. There is a need to increase the pace and scale of fuel reduction. (insert above after existing paragraph eleven on wildfire)
 15. Sequoia National Forest provides recreation and tourism which are vital for local rural communities. Roads and trails are necessary for people to access Sequoia Forest Lands in order to relax and recharge from the stresses of daily life. Motorized recreation including driving for pleasure and off road recreation is the most popular activity in the forest.
 16. Motorized access has played a historic role in National Forests from family car camping to recreation vehicles and for management purposes. Motorized recreation will likely continue to play an important role and increase in popularity in future due to increased demand for adventure recreation combined with increasing age of the population. The Off Highway Motor Vehicle Green Sticker fund has contributed significantly as the largest funding source other than federal tax dollars for California National Forest programs. The role these OHV funds have played on National Forest lands includes building and maintaining routes open to all forms of recreation, as well as funding education, environmental and non motorized projects.

Thank you for this opportunity to provide input to the planning documents.

Sincerely,

Chris Horgan
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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 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"