

STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3
PO Box 267
Lake Isabella, CA 93240

September 20, 2013

Sequoia National Forest
Attention: Marianne Emmendorfer
35860 Kings Canyon Road
Dunlap, California 93621

RE: Comment on Sequoia Travel Analysis Process, Subpart A, Road Analysis 2013

Dear Mrs. Emmendorf,

Thank you for the opportunity to submit comments relating to the Sequoia National Forest's Travel Analysis Process (TAP), Subpart A, and Road Analysis Project (RAP). This letter will accompany my road specific comments using the Forest supplied feedback form. The following are my general comments which should be applied to all roads within the SQNF.

- 1) In order to preserve public access and reduce road maintenance costs, roads considered for closure or decommissioning should first be evaluated for lowering their maintenance level and remain open to the public.
- 2) In order to preserve public access, reduce road maintenance costs and enhance recreation opportunities, roads considered for closure or decommissioning should first be evaluated for possible conversion to OHV routes. The Forest could then apply for state OHV funding for route development and maintenance.
- 3) System roads should not be closed or decommissioned if doing so will negatively impact access, connectivity and looping options for other Forest routes unless that impact has been fully analyzed and mitigated.

While I realize this is not a NEPA process, I have serious concerns about the incredibly short stakeholder and public comment period (10 days) given the sheer volume of data (over 22,000 data points) and the format (.pdf only) in which the data was published. I question if the public has been well served during this process and whether the quality and number of comments received will suffer as a direct result.

I would like to suggestions that in the future when seeking stakeholder or public comments that:

- 1) A 10 day comment period post document publication is wholly insufficient with 30, 60 and 90 day comment periods being the norm.
- 2) Large data spreadsheet tables need to be published in a format which can be fully searched and sorted, I would suggest .xls format. For medium and large tables PDF format should be avoided as the resulting documents are not searchable by column or row and cannot be sorted.
- 3) With the technology now available to everyone, geospatial data should be released in Google Earth format (.kml, .kmz) and should include all map layers that could be impacted even if technically beyond the scope, in this case Forest routes other than ML 1-5 roads.

Sincerely,

Bruce Miller
Director of Public Lands
Stewards of the Sequoia
Division of CTUC 501c3 non profit

Attachments – Subpart A Comment Forms:

13S97 Feedback.docx
22S02 Feedback.docx
24S89 Feedback.docx
25S21 Feedback.docx
26S30 Feedback.docx
27S12 Feedback.docx
28S44 Feedback.docx

Sequoia National Forest Travel Analysis, Subpart A

Please provide us with your feedback on the Sequoia National Forest Travel Analysis Process, Subpart A. The Sequoia National Forest is conducting a Travel Analysis to identify opportunities for its road system to meet current or future management objectives. This analysis is based on ecological, social, cultural, and economic concerns.

The Sequoia National Forest needs your input on an economically, socially, and environmentally sustainable road system. Your feedback, including your name and contact information, will become part of the public record. Information submitted anonymously will be accepted and considered; however, anonymous feedback will not provide the agency with the ability to provide updates.

Background information is available at: <http://www.fs.usda.gov/goto/sequoia/TAP> to help you give feedback on specific roads or the entire designated road system.

Please use this form to provide input by September 20, 2013. We welcome your perspectives on how the Travel Analysis Process, Subpart A, is being developed and how the ratings apply to designated roads in the Sequoia National Forest. Please submit your feedback on this form by e-mailing it to comments-pacificsouthwest-sequoia@fs.fed.us with Subject: **Travel Analysis Process**; mailing it to Sequoia National Forest, Attention: Marianne Emmendorfer, 35860 Kings Canyon Road, Dunlap, California 93621, or bringing it to any Sequoia National Forest office.

Road Number (or nearest route on the map):

22S02 Last Chance, important for connectivity and loop options.

Description: This route is an important recreation access and connecting road tying County Rd. 107 and 22S82 together. Beautiful road passing thru vegetation zones as altitude changes. Recently graded and graveled.

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)
[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

Keep road system as it is Make more driving/auto tour loops

Make tour bus routes Other (Please explain):
[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many?____)

Additional Feedback: [We find that the length of the comment period \(10 days\) given the nature \(shear volume & format\) of the materials provided, is grossly inadequate in light the importance of the subject matter under consideration.](#)

Contact information (for clarification and follow-up):

Name (and organization, if applicable): [Bruce Miller, Stewards of the Sequoia](#)

E-mail or phone number: mcnut@bak.rr.com, 425-241-2860

Mailing address: [7505 Kimberly Ave, Bakersfield CA 93308](#)

Please contact me to provide updates.

Sequoia National Forest Travel Analysis, Subpart A

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Road Number (or nearest route on the map):

24S28 Rincon , connectivity to 33E23 and Kern River Hwy.

Description: This route is a vital access route to the south end of the Rincon Motorcycle trail 33E23. If 24S28 closes to motorized 33E23 becomes a dead-end at its southern end. 24S28 must remain open as a road or be converted to a motorized trail.

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)
[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

Keep road system as it is Make more driving/auto tour loops

Make tour bus routes Other (Please explain):
[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many?____)

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Sequoia National Forest Travel Analysis, Subpart A

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Please use this form to provide input by September 20, 2013. We welcome your perspectives on how the Travel Analysis Process, Subpart A, is being developed and how the ratings apply to designated roads in the Sequoia National Forest. Please submit your feedback on this form by e-mailing it to comments-pacificsouthwest-sequoia@fs.fed.us with Subject: **Travel Analysis Process**; mailing it to Sequoia National Forest, Attention: Marianne Emmendorfer, 35860 Kings Canyon Road, Dunlap, California 93621, or bringing it to any Sequoia National Forest office.

Road Number (or nearest route on the map):

25S21 Cooks Peak, important for connectivity and loop options.

Description: This route is an important motorized recreation access and connecting road linking with 32E46, 21E84 and 25S15.

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)

[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

3 Keep road system as it is 2 Make more driving/auto tour loops

Make tour bus routes 1 Other (Please explain):

[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many? ____)

Additional Feedback: [We find that the length of the comment period \(10 days\) given the nature \(shear volume & format\) of the materials provided, is grossly inadequate in light the importance of the subject matter under consideration.](#)

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Sequoia National Forest Travel Analysis, Subpart A

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Please use this form to provide input by September 20, 2013. We welcome your perspectives on how the Travel Analysis Process, Subpart A, is being developed and how the ratings apply to designated roads in the Sequoia National Forest. Please submit your feedback on this form by e-mailing it to comments-pacificsouthwest-sequoia@fs.fed.us with Subject: **Travel Analysis Process**; mailing it to Sequoia National Forest, Attention: Marianne Emmendorfer, 35860 Kings Canyon Road, Dunlap, California 93621, or bringing it to any Sequoia National Forest office.

Road Number (or nearest route on the map):

[26S30 Davis Loop, connectivity to 25S15 and 26S06](#)

Description: [This route is important for motorized connectivity and loop options with 25S33 and 26S06](#)

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)

[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

3 Keep road system as it is 2 Make more driving/auto tour loops

Make tour bus routes 1 Other (Please explain):

[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many? _____)

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Sequoia National Forest Travel Analysis, Subpart A

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Please use this form to provide input by September 20, 2013. We welcome your perspectives on how the Travel Analysis Process, Subpart A, is being developed and how the ratings apply to designated roads in the Sequoia National Forest. Please submit your feedback on this form by e-mailing it to comments-pacificsouthwest-sequoia@fs.fed.us with Subject: **Travel Analysis Process**; mailing it to Sequoia National Forest, Attention: Marianne Emmendorfer, 35860 Kings Canyon Road, Dunlap, California 93621, or bringing it to any Sequoia National Forest office.

Road Number (or nearest route on the map):

27S12 Delongeha Access, maintain administrative access

Description: This route is important for motorized administrative access to 32E49, 31E22, 31E76 for maintenance of a number of connecting motorized routes.

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)

[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

3 Keep road system as it is 2 Make more driving/auto tour loops

Make tour bus routes 1 Other (Please explain):

[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many? ____)

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Sequoia National Forest Travel Analysis, Subpart A

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Road Number (or nearest route on the map):

28S44 Solomons Ridge, connectivity and loop options

Description: This route is addressed in the Proposed Action for the yet to be completed TMP for the Piutes and as such must await the conclusion of that process before any action.

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

Driving for Pleasure Get to Camping Area

Get to Resort/Organization Camp OHV/OSV Use

Get to Spiritually Significant Place Get to Trail for Hiking

Get to Picnic Area Get to Hunting/Fishing Area

Get to Forest Product Gathering Area Pass Through to Other Land

Get to Special Use Permit Site Other (Please explain)

[Driving for Pleasure](#)

Road system you prefer to have in the forest (Please rate top 3: 1 to 3, highest to lowest):

3 Keep road system as it is 2 Make more driving/auto tour loops

Make tour bus routes 1 Other (Please explain):

[Make more motorized loops](#)

How often do you use the forest each year (Please X only one):

Never A day or two per year

About 1 week per year About 1 month per year

About 6 month per year More than 6 months per year

How long have you and/or your family used the forest (Please X only one):

Never About 1 to 10 years About 11 to 30 years

About 31-50 years About 51-70 years About 71 to 90 years

More than 90 years (How many? ____)

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Sequoia National Forest Travel Analysis, Subpart A

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Road Number (or nearest route on the map):

[13S97 Millwood, connectivity and loop options.](#)

Description: [This route is an important recreation access and connecting road tying many roads together.](#)

GPS Data/Coordinates: _____

Map Attached: _____

Photo(s) Attached: _____

Reasons you use Forest Roads (Please X all that apply)

| Driving for Pleasure | Get to Camping Area

| Get to Resort/Organization Camp | OHV/OSV Use

| Get to Spiritually Significant Place | Get to Trail for Hiking

| Get to Picnic Area | Get to Hunting/Fishing Area

| Get to Forest Product Gathering Area | Pass Through to Other Land

| Get to Special Use Permit Site | Other (Please explain)

| [x](#) Please contact me to provide updates.