

STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3

PO Box 1246

Wofford Heights CA 93285

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,

We provide the following extremely limited comments with the understanding they are far from complete and likely have missed many important points regarding the need to keep specific important routes open. Routes that have not been specifically included in our comments should not be considered less important. It is just that we lacked the time during this incredibly short comment period to include them in our review. This comment is in addition to those submitted by Bruce Miller our Director of Public Lands.

We are shocked by the precedent setting short 10 day comment period with zero advance notice for the public to review, analyze and comment on the proposal regarding 1646 miles of roads. We feel this short comment period with zero notice fails to meet the intent of the regulation (36 CFR 212.5(b)(1)) to “*involve a broad spectrum of interests and affected citizens*”. The short comment period has made it incredibly difficult or impossible for most people to make any comment and certainly not a thorough comment.

*In determining the minimum road system, the responsible official must incorporate a science-based roads analysis at the appropriate scale and, to the degree practicable, **involve a broad spectrum of interested and affected citizens**, other state and federal agencies, and tribal governments. 36 CFR 212.5(b)(1)*

Since the only way the Sequoia has provided to access the proposal maps, data, spreadsheet, comment form is on the web and the comment form is only available on the web and the only public meeting was held on the web the majority of the public have been summarily excluded from reviewing the information and making comment. Additionally since many of the files are extremely large they cannot be accessed by the public using dial up, however many of the people in the affected area only have dial up service, therefore they have been excluded from making comments.

The majority of the public who recreate and have long term knowledge of the Sequoia Forest do not have internet service or computer skills to download the maps and data. Yet the only method provided by Sequoia is online access.

This Road Analysis will affect access to trails however the data and maps do not show trails making it most difficult for the public to ensure that what may appear on the Road Analysis Map as a dead end spur road of less value is actually the access point to the trail.

It has been stated that the public was involved in 2003 in Road Analysis and that is why only a 10 day comment period was provided today in 2013. However that public comment was only for the roads in the Sequoia Monument. Today the forest is analyzing the roads in the entire Sequoia National Forest. Much has changed with respect to roads over the past ten years not least of which was Travel Management Sub Part B. The public was allowed four to five months to comment on just the Monument roads in 2003, yet the public is only allowed 10 days to consider those changes and others in relation to this new proposal including far more roads.

- Have all roads, especially those perceived at high risk for closure, been analyzed to see if they provide connectivity for 4x4 trails or single track trails?
- Have all the spur roads proposed for closure been analyzed to see if they offer camping, fishing, hunting opportunities?
- Can the roads proposed for closure be downgraded to 4x4 trails to provide continued opportunity?
- Have forest recreation officers and their staff been tasked with reviewing the proposal and commenting and have they been given a block of adequate time without any other projects to do this?
- The Sequoia needs to provide a map and spreadsheet showing all forest roads, 4x4 trails and single track trails in order to enable them to make informed comments about the current proposal.
- Google Earth maps including all routes with tags describing the status and issues for each route was provided to the public by the BLM during the recent RMP process. Google Earth maps with all the routes and tags should be provided to the public in order for them to be able to make informed comments.
- The data provided by the Forest Service explained how each of the fifteen categories were rated, but we could not find an explanation of how the each of the three final categories were calculated to create the three Travel Analysis Maps. Without this information it is impossible for the public to verify the final ratings or to ensure they represent on the ground conditions.
- The use of fifteen category criteria and the three tier rating system appear to be a new method which the public is unfamiliar with. A much longer comment period is needed for the public to have time to get up to speed on this new approach in order to make complete comments.

FIRE FIGHTING AND FOREST HEALTH PROJECTS

Virtually all of the roads in Sequoia and especially the spur roads were built for forest health fuel reduction project access. With the current overgrown high fuel loads in our forest there is an increased need for fuel reduction projects. Therefore the rating of each road would need to be adjusted up to take this into account. Considering these roads will also be needed for planting and other forest health projects the ratings should be even higher. This makes it apparent that management access ratings need to be given more weight when considering the overall rating of each route

RECREATION AND TOURISM

Not so long ago timber harvesting was greatly reduced in our National Forests the public was told that recreation and tourism would replace the lost timber income. However the closure of routes to recreation will reduce recreation opportunity negatively effecting recreation and tourism. Likewise the closure of routes will concentrate use increasing impacts on remaining routes and increasing maintenance costs. This makes it apparent that recreation and access ratings need to be given more weight, just as private access has been in the analysis when considering the overall rating of each route.

*When the road provides access to other landowners, the Forest Service is obligated to provide for reasonable access. Because of the need to provide and manage this access, **this factor is heavily weighted.** (Page 6 Access Factors)*

ENVIRONMENTAL

Most of the routes being analyzed have been in existence for a long time. Their largest impact most likely has already occurred and their current impact is likely quite small. Closing these routes will hamper or stop the Sequoia Forest staff from implementing projects of benefit to the environment. The routes need to be kept open in order to allow the Sequoia Forest to perform more environmentally beneficial projects such thinning and planting.

PIUTES

Sunset road 26S04A is mistakenly shown as shown as RED proposed for closure and as RED low benefit rating. The spreadsheet actually rates is Moderate benefit rating not Low. However Sunset 26S04A is the access to 33E65 Liebel Peak Trail and should be rated high value for access. The route also provides access to a beautiful viewpoint as well as to watch sunsets hence the name. It is also one of the few spots where cell phones work. The Access rating for 28S04A should be changed to high. The route must be kept open. Perhaps it could be changed to a 4x4 trail. The route also provides access for vegetation management.

The Piutes Travel Management Plan is on hold although this road analysis includes the Piute Roads. There are many roads in the Piutes which are currently shown as **U routes**. Are those two track U routes part of this process or are those considered 4x4 trails? For example one of those routes is U00141 and is an important connector from 34E44 to Piute Mountain Road. The connector two track U00141 is not shown in the road analysis, nor are any of other two track U routes. Are they going to remain open? Do we need to include comments for each of them?

The road down to **Burton Mill** which connects Clear Creek Trail from Saddle Springs Road is not shown on the map. Is this Burton Mill Road a 4x4 trail or should it be shown on the Road Analysis? It is an important loop connector road that must remain open.

Piute Mountain 27S02F is mistakenly shown as LOW importance for Access; however it is a segment of 33E65 Liebel Peak Trail. The 27S02F connector must remain open or the Liebel Peak trail will dead end. It could be converted to trail to be in keeping with the 33E65 trail that is a segment of.

Solomons Ridge 28S44 is part of the Piute Proposed Action and should remain open pending the outcome of the Piute Plan

GREENHORN

The Greenhorn road and trail system was heavily impacted by the closure of routes due to perceived Condor issues. However since those closures were enacted it has been revealed that Condors favor living in areas where people are located, so humans travelling on roads is clearly not a threat to them. Also it is known via radio tag data that the Condors do not visit the area often. Since there are gates located on routes now it would make sense to allow those roads to be reopened and to close them if needed for specific Condor nesting.

For example-

Oak Ridge 26s20 is not mapped correctly and is important for atv and dualsport by opening gate. This would also increase safety by providing an OHV route to keep people off of Rancheria Road

Basket Ridge 26S08 that ties to 26S05 is important for atv and dualsport

Black Gulch Keep Road 26S06 is and an important part of the loop around the mountain and also connecting to Keyesville and Freeway Ridge.

However the map shows a portion of that loop **26S30 Davis Loop Road** as RED proposed for closure. As the name Davis Loop implies this is an important loop road and should be rated High importance but somehow it is mistakenly rated as Moderate. It connects to 26S06, then to motorized trail 31E22. This road is part of 31E22 and should be retained as a motorized trail if not as a road. Actually the 26S30 Davis Loop Road is of such importance that it has just been graded by Forest Crews this week so it should be retained. There is clearly a need to have this entire Road Analysis reviewed and updated by recreation staff to ensure that existing on the ground conditions and knowledge are included in the analysis.

Davis Loop Road 26S13 also is part of the above mentioned loop and should be retained

Rincon Road 24S89 is mistakenly shown as Moderate for Access. This road, as the name implies is the access for the Rincon Trail 33E25. It is of high importance and must remain open to access one end of the trail.

Windy Gap 25S17 is mistakenly rated as Moderate Access importance, but should be rated High since it provides access to motorized trail 32E66.

Wagy Flat Road 25S02 is mistakenly rated as Moderate Access importance. It is the Westside Greenhorn access route and should be rated High Access and retained as connecting route between Old State Hwy and Waggy Flat Road (County Road)

Greenhorn West 26S01 segment is important to connectivity of road system in this area. It is an access road to the Davis Flat trail head

Delongeha Access 27S12 provides access from HWY 178 to motorized trail 31E75. This gate is not open to the public but is used by volunteer trail crews to maintain 31E76 and 32E49. It may also be used as part of a grazing lease in the area. The road should be retained for these purposes

The following roads are of extreme importance and need to remain on the system-

26s05
25s15
25s04
25s21
22s02
22s05
22s99
21s80
25s31
25s25

Many of the sections shown as private are not any longer so the roads to these areas should not be closed.

Has the Forest Service contacted property owners like Bill Prince to buy sections like the one at the end of 26S06A that would affect roads, 4x4 trails and single track trails?

We support the comments submitted by Bruce Whitcher on behalf of CORVA.

Sincerely,

Chris Horgan
Executive Director
Stewards of the Sequoia
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 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