



File Code: 1570

Date: February 21, 2023

Chris Horgan
Stewards of the Sequoia, Executive Director
PO Box 1246
Wofford Heights, CA 93285

Dear Mr. Horgan,

I received your letter describing your concerns about the objection process for the Sierra and Sequoia National Forests plan revision process. I was sorry to hear that you felt the process didn't adequately address your objections. To understand where the process may have fallen short, I examined the process and the planning record related to your claims. My understanding is that you believe our process fell short in the following ways:

- Objectors were prohibited from discussing specific objections and were told to only discuss new issues, and that discussion of the information stated in the objection letter was prohibited.
- The reviewing officer written response was insufficient because it condensed, mischaracterized, and ignored objections; and this constitutes a violation of NEPA and the 2012 Planning Rule because it obstructs the efforts to participate in the public engagement requirements of the planning process.
- The issue related to changing the name of the Challenging Backroad Areas (you referred to the areas as "Backroad Recreation Area" in your letter) is a an "old issue referred to as a new issue," and therefore was discussed despite the prohibition on discussion of content of objection letters.

In response to your first point, my staff reviewed the recordings of the meetings and found that we did not prohibit discussion of your objection topics; rather we clearly articulated that we did not want objectors to read or repeat the objection letters verbatim, but to summarize objections and focus on remedies and resolution, due to the amount of time we had to discuss issues during the meeting. We made it clear several times throughout the meeting that we encouraged discussion of the objections, and we did discuss objection issues throughout the three days of the meeting, not new issues.

In addition, the format of the resolution meeting is up to the discretion of the reviewing officer and is not dictated in the 2012 planning rule regulations, with one exception: the regulations require that interested persons be permitted to be involved in discussion of objections.



Therefore, a group discussion amongst the objectors and interested persons is required, rather than a one-on-one and point-by-point discussion with each objector (see [36 § CFR 219.57\(a\)](#)).

In response to your second point, I understand that our practice of combining objection issues from multiple objectors during our review, and summarizing our findings in the response letter, can appear that we are giving short shrift to the review of the issues. We did thoroughly review the contents of the objection letters, and we summarized our response to make it more digestible and to focus on the key points and key findings. The 2012 planning rule regulations specifically do not require a point-by-point response to objections, stating: “The reviewing officer must render a written response. A written response must set forth the reasons for the response but need not be a point-by-point response ” ([36 § CFR 219.57\(b\)\(1\)](#)).

In response to your third point, the name of the Challenging Backroad Areas has been an ongoing point of confusion and contention during this plan revision process, and many people have requested that we change the name to better reflect the intent of the areas. We discussed the topic as an objection issue, not as a new issue, and folks from many sides of the discussion agreed that the name was misleading and changing the name would increase clarity; therefore, we decided that we could commit to making that change.

I regret that this process was not satisfying to you and others in your organization. I value your input and the discussions we had during the resolution meetings. The objection period is now closed, so additional objection resolution discussions are not appropriate at this time. My staff and the Forest Supervisors, Teresa Benson, and Dean Gould are in the process of making changes to the record in response to the objection instructions outlined in my objection response letter. As the responsible officials, the Forest Supervisors will sign their decisions in the next few months. I encourage your continued engagement with them as they complete the planning process. Thank you for your interest in management of public lands.

Sincerely,

X 

Jody Holzworth

Deputy Regional Forester

Signed by: Department of Agriculture

JODY HOLZWORTH
DEP REGNL FORSTR

cc: Alan Olson, Teresa Benson, Keith Fox, Talitha Derksen, Bobbie Miller