

STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3
PO Box 1246
Wofford Heights CA 93285

August 20, 2018

Teresa Benson
Forest Supervisor
Sequoia National Forest

Dean Gould
Forest Supervisor
Sierra National Forest

Re: Opposition to New Wilderness and Backcountry Designation Areas

Dear Supervisor Benson and Supervisor Gould,

Our understanding from speaking with your recent predecessor Sequoia Forest Supervisor Ann Carlson is that the Forest Service is considering adding an alternative to the Forest Plan Revision for additional Wilderness and Backcountry restrictive designations of up to 758,000 acres in the Sequoia and Sierra National Forests, because it would provide for a greater diversity of alternatives. We understand this proposal is being made by Sierra Forest Legacy.¹

Stewards of the Sequoia continues to be the largest on the ground volunteer organization in the Sequoia since 2004, performing over 80% of all trail maintenance in the Sequoia National Forest each year. As the primary trail volunteer organization we think it is not possible for the Forest Service to comply with the requirement to increase trail volunteerism by 100% within five years, per the National Trail Stewardship Act of 2016, if they reduce motorized opportunity, as Sierra Forest Legacy wishes, thereby reducing motorized volunteerism and motorized trail OHMVR funding.

We and the 41 cosigners of this comment letter object to the Sierra Forest Legacy proposal for vast additional Wilderness and Backcountry restrictive designations for many reasons, some of which are included in this letter. The signers of this letter represent a wide spectrum of interests including mountain bike, horse, conservation and motorized groups. Many of these groups are local and know the area intimately. Chambers of Commerce, local businesses, home owner associations, realtors and other organizations have cosigned due the negative economic impacts more Wilderness or Backcountry restrictive designations will have on our struggling local economy.

¹ Recommended Wilderness Areas and Backcountry Management Areas Proposal Sierra and Sequoia National Forests (4-9-18) Sierra Forest Legacy

Stewards of the Sequoia have been engaged in the Forest Plan Revision Process now for over five years. We have submitted several comments during scoping as well as on the Draft EIS, including one comment letter² cosigned by over 57 organizations opposing any additional Wilderness recommendations. We have also submitted comments regarding the need to preserve all existing multiple use lands to disperse use and reduce impacts.

Stewards of the Sequoia have also been engaged in the Sierra Cascades Dialogs and commented extensively on the Science Synthesis output document which informs future land management planning, such as the Sequoia and Sierra Forest Plan Revisions. Our comments caused the Forest Service Pacific Southwest Research Station to redraft that Science Synthesis, in order to remove numerous flawed statements and conclusion regarding motorized recreation. We hope the Forest Service will likewise heed this comment letter and not include any portion of the Sierra Forest Legacy proposal in the Forest Plan alternatives.

Background

The Sierra Forest Legacy proposal addresses problems that do not exist-

- They want to protect Recommended Wilderness Areas, but there are none in Sequoia.
- They want to prevent roads from being built in designated Roadless Areas, but roads are already prohibited in these areas.
- They claim there is a need for their proposal to protect human powered recreation, but there are no risks to mountain bike recreation. Not one mountain bike group has cosigned their proposal, most likely because it could actually harm trails enjoyed by mountain bikers.
- They claim they want to solve user conflict, but we have a long history of successfully sharing trails in Sequoia and Sierra National Forests.
- They claim they are working with stakeholders in the area, but they have not reached out to any stakeholder group or volunteer group or adopt a trail group in Sequoia or Sierra National Forests.
- Their proposal lacks support from any recreation group or groups who maintain trails. It is cosigned by 24 anti access groups, all but one of which are located far from Sequoia or Sierra National Forest, and likely have little if any firsthand knowledge of our area.

No Local Support

Groups who maintain and enjoy the trails in the Sequoia and Sierra National Forests oppose any proposal for more Wilderness or Backcountry restrictive designations, such as the Sierra Forest Legacy proposal. Indeed no local group who enjoys or maintains trails in the Sequoia and Sierra National Forests support any part of that proposal. All popular mountain bike trails in the area are adopted and maintained by motorized volunteers, such as Stewards of the Sequoia and Stewards of the Sierra.

The Sierra Forest Legacy claims of user conflict flies in the face of the US Government Accounting Office (GAO) Congressional Report on how to manage increased Off Highway Vehicle Use on Federal Lands³ which determined "*that social and safety impacts, such as conflicts with nonmotorized users, occasionally or rarely occurred.*". On a local level the people who enjoy recreation in Sequoia and Sierra have a long history of getting along and sharing

² Stewards of the Sequoia Comment Letter-Draft Wilderness Evaluation Narrative Comments, 2/1/ 2016

³ GAO 09-509 Federal Lands-Enhance Planning Could Assist Agencies in Managing Increased Use of Off-Highway Vehicles June 2009

trails. They do not see the need for increased restrictions on public lands such as all aspects of the Sierra Forest Legacy proposal.

Furthermore the Forest Service agreed with the GAO report recommending that "*the Forest Service and BLM improve their strategic planning and take other actions to help provide quality OHV opportunities*". The Sierra Forest Legacy proposal is contrary to that purpose. It would reduce the quality of OHV opportunity and restrict OHV recreation in current and future strategic planning.

Need to Preserve Multiple Use Lands

The loss of multiple use lands due to the recommendation of Wilderness or the creation of limited use Backcountry Areas, is not socially or environmentally sustainable (FS1909.12, Chapter 10). The majority of the public recreate on multiple use lands, due to the restrictions placed on Wilderness lands and difficulty in accessing them. There is a clear need to preserve existing multiple use lands where 99% of the public recreate⁴ to maintain these desired conditions and promote visitor satisfaction. There is no documented need to expand Wilderness lands further concentrating use on remaining multiple use lands and increasing impacts, as Sierra Forest Legacy proposes.

Forest Service Visitor Use Monitoring severely undercount OHV use by a factor of 18. However we created a report⁵ based on Forest Service OHV Grant data and OHV registration that shows OHV use to be the second largest form of recreation in the Sequoia National Forest. The NSRE Recreation studies⁶, as well as independent studies such as the Outdoor Recreation Economy-OIA 2012 show motorized use as one of the largest or the largest form of recreation, as well as the largest growing form of recreation.

Clearly the demand for motorized opportunities by Forest users has never been greater, while the need for wilderness recreation opportunities has never been lower⁷. With over 50% of the Sequoia National Forest already locked up in Wilderness or other restrictive designations, there are already more than enough Wilderness and restrictive land designations. The Sierra Forest Legacy proposal would prohibit the Forest Service from considering any new motorized trails needed to address the growing need for OHV recreation on 758,000 acres, while instead taking away multiple use lands, so that only a very small portion of the public will be able to enjoy them.

The Kern County Board of Supervisors also recognize the need to preserve our remaining multiple use lands. They submitted a letter on 9/23/14 letter to the Forest Service objecting to any recommendations for new Wilderness Areas by the forest service. Under Coordination Law the Forest Service must comply with Kern Counties plan for no new Wilderness Areas.

⁴ Based on Forest Service Visitor Use Monitoring and Wilderness Trailhead registers less than 1% of public recreate in Wilderness lands

⁵ Flawed NVUM Report www.stewardsofthesequoia.org/Powerpoint/FlawPiuteMVUM.ppt

⁶ Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE) June, 2005, Cordell et al

⁷ Jobs, Economic Development and Sustainable Communities Strategizing Policy Needs and Program Delivery for Rural California, Dr. Glenda Humiston State Director, USDA Rural Development February 9, 2010

Harming The Economy

Limiting who can enjoy public lands, such as Sierra Forest Legacy wishes, will reduce motorized and other tourism and harm our local struggling rural economies. The US Department of Commerce Bureau of Economic Analysis 2016 determined that motorized recreation provides the largest gross output in the recreation economy. The report shows that people enjoying motorized recreation spend almost three times as much as those who recreate in Wilderness. Yet Sierra Forest Legacy proposal would further limit motorized recreation and reduce motorized income to our rural economy.

In 2010 the USDA⁸ report on sustainable communities determined that -

"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. Actions by public agencies to reduce or limit access to recreation on public lands have a direct impact on the local economy.."

Again we find the Sierra Forest Legacy proposal is contrary to existing studies and would harm the local economy and tourism contrary to Forest Service policy.

Harming Recreation Opportunity Spectrum

The expansion of Wilderness areas or the creation of Backcountry restrictive areas, would not be in keeping with the need to preserve Primitive and Semi Primitive Motorized Recreation Opportunity Areas.

Too Late In The Process

758,000 acres is a lot of land by any standard. In this case, it represents a large percentage of the Sequoia and Sierra National Forests. Yet this huge proposal for more Wilderness and Backcountry restrictive designations was just now presented at the eleventh hour after scoping was long completed, and almost two years after the Draft EIS was released, and mere months before the Final EIS is due to be released. This proposal was therefore not vetted by the public in scoping, was not considered in the Draft EIS, and as a result has not gone through the proper process for consideration by the public or the Forest Service under NEPA.

The Backcountry Recreation designation was never even mentioned during scoping or in the Draft EIS, and as such it fails to comply with NEPA as well as being too late to be reasonably considered in the process.

Wilderness Evaluation Completed Long Ago

We applaud the Forest Service for completing a lengthy, comprehensive and in depth Wilderness Evaluation in 2015, which ensured all lands that met Wilderness criteria, were considered for Wilderness recommendation in the Forest Plan.

Since all lands that could meet Wilderness standards, per FSH 1909.12 - Chapter 70 were identified by the Forest Service Wilderness Evaluation in 2015, the additional lands proposed by Sierra Forest Legacy must not meet the Wilderness criteria. If the Forest Service feels there are additional lands that meet the Wilderness criteria, then the 2015 Forest Plan Wilderness

⁸ Jobs, Economic Development and Sustainable Communities Strategizing Policy Needs and Program Delivery for Rural California, Dr. Glenda Humiston State Director, USDA Rural Development February 9, 2010

Evaluation is flawed and must be redone prior to completion of the Forest Plan in order to meet FSH 1909.12 - Chapter 70.

It is the public's expectation that work done by the Forest Service is complete and thorough and that the Forest Service has complied with FSH 1909.12 - Chapter 70.

The Forest Service 2015 Wilderness Evaluation thus far appears to meet those expectations. Does the Forest Service feel they did not do a good job and missed lands that could meet Wilderness criteria, such as those in the Sierra Forest Legacy proposal?

Hampers Ability of Forest Service to Manage Lands

The huge areas now being proposed for Wilderness additions by Sierra Forest Legacy would negatively affect the ability of the Forest Service to meet many management objectives, such as managing enough public lands for all forms of recreation as identified by the Recreation Opportunity Spectrum designations, to provide multiple use opportunities sufficient for growing forms of recreation and a growing population, and to promote Forest health.

Most of our public lands in Sequoia and Sierra National Forests are in very poor health with 60-80% tree mortality. These lands are in dire need of active management to reduce fuel loads. Without treatment wildfires are likely to be devastating to the watershed, wildlife and soils. More Wilderness recommendations or Backcountry restrictive designations would be environmentally unsustainable by reducing the tools available to the Forest Service to manage these lands (FS1909.12, Chapter 10).

Forest Service Lacks Resources to Manage Existing Wilderness

The Forest Service lacks the resources to maintain existing designated Wilderness trails with no hope of this changing in the foreseeable future. Existing Wilderness trails are often blocked by downed trees making them impassable and a safety hazard. Frustrated users often resort to using chainsaws to clear downed trees thereby harming the Wilderness character and violating the express purpose of Wilderness to exclude motorized use such as chainsaws.

Trail Carrying Capacity

It is well known that trails have a carrying capacity beyond which trails will deteriorate requiring much greater maintenance and will reduce user satisfaction. Many multiple use trails in areas of Sequoia, such as Kennedy Meadows, are already deteriorating due to over use. This indicates the need to expand the multiple use trail system to prevent over use. The Sierra Forest Legacy proposal would eliminate the possibility of expanding the trail system, thereby increasing impacts, increasing maintenance costs and decreasing user satisfaction.

Lack Of Need and Lack Of Justification

Almost all the trails in the Sierra Forest Legacy proposal area are currently maintained by OHV volunteers and OHV funding. If motorized use was prohibited, as this proposal wishes to with their Backcountry restrictive designation, the trails would quickly become overgrown and unusable for anyone including non motorized users.

- The Forest Service has not justified eliminating their largest form of volunteerism and funding in the form of motorized users from these proposed Wilderness and Backcountry lands.

- The Forest Service has not shown how they will be able maintain the trails in these new Wilderness and Backcountry areas, when they cannot maintain the trails in existing Wilderness lands now.
- The Forest Service has not shown how they will meet the Multiple Use Sustained Yield Act by closing existing trails to motorized use.
- The Forest Service has not shown how they plan to meet their management objectives to promote forest health and reduce fuel loads by adding these proposed Wilderness and Backcountry lands, which would greatly restrict all forms of management.

All of the above should have been disclosed during scoping and the Draft EIS, but it was not and it too late to consider now at this stage of the Forest Planning process.

Need for Inclusion of Proposal to Restore 70 miles of Multiple Use Loop Trails

The existing designated Wilderness boundaries cut off the historic motorized loop trails and have already harmed the trails by forcing out and back use. Stewards of the Sequoia submitted a proposal during scoping on July 13, 2015, **Wilderness Evaluation boundary adjustment recommendations**, to address this problem by making minor boundary adjustments of 2500 acres to restore 70 miles of loop trails, which would reduce impacts and increase user satisfaction.

This proposal would be in keeping with the Forest Service wishes to have a greater diversity of alternatives, as well as addressing a valid need. We therefore expect to see our proposal included in the Final EIS, even though it was somehow omitted by the Forest Service in their subsequent Draft EIS after we had submitted our proposal. That proposal is attached.

Other Valid Comments

Unlike the far too late Sierra Forest Legacy proposing more Wilderness and Backcountry restrictive designations, Stewards of the Sequoia have submitted several comment letters and our boundary adjustment proposal during the proper comment periods for scoping or Draft EIS, which have addressed the need for preserving multiple use lands and the lack of need for expanding Wilderness. Please refer to Stewards of the Sequoia comment letters-

- June 29, 2014 Re: **Comment on Need To Change regarding Forest Plan Revision**
- July 8, 2014 Re: **Comment on the Updated LRMP Revision Need to Change**
- September 21, 2014 Re: **Wilderness Evaluation Comment**
- June 9, 2015 Re: **Wilderness Analysis Comment**
- February 1, 2016 Re: **Draft Wilderness Evaluation Narrative Comments**

In the past the Forest Service has been reluctant to acknowledge data sources other than their own, however Regional Forester Randy Moore stated in a letter on July 25, 2018 (File Code 1920) that in order to comply with the new 2012 Planning Rule, the Forest Service will now seek datasets from other agencies, non government organizations and even citizen science.

In keeping with that we have cited reports and analysis from the US Department of Commerce Bureau, Outdoor Industry Association, USDA and others to provide a more complete analysis of recreation which shows motorized recreation to be the largest form of recreation. We assume the Forest Service will welcome this information now.

CONCLUSION

There is no part of the Sierra Forest Legacy proposal that is justified. As outlined in this comment letter it would be harmful to trails and recreation, harmful to the environment, harmful to the economy and tourism, contrary to many desired conditions and management objectives. The Forest Service must not include the Sierra Forest Legacy proposal in any form in any Forest Plan Alternatives.

Please include this comment letter in the record and consider it as you draft the Final EIS.

Sincerely,

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COSIGNERS-

AMA District 37 Dual Sport	Keith Huff, President
American Lands Access Association	Shirley Leeson, Director
American Motorcyclist Association	Nick Harris, Western States Representative
Backcountry Horseman-Kern River Unit	Larry Cigainero, President
Bakersfield Trailblazers	Jeremy Rowell, President
California Federation of Mineralogical Societies	Jennifer Haley, President
California Trail Users Coalition	Bruce Whitcher, Vice President
CARE-USA	Candace Outhout, Executive Director
Chapparals MC	Mike Adams, President
Concerned Off-Road Bicyclists Association	Steve Messer, Board Member
Cyclesmiths	Mike Loomer, Owner
Eastern Sierra 4WD Club	Mike Johnston, President
Freeman Realty	Matt Freeman, Owner
Kern Mining Districts	Robert Foster, President
Kern Off Highway Vehicle Association	Jack Patterson, President
Kern Recreation Landowners Association	Rick Arreola, Vice President
Kern River Conservancy	Gary Ananian, President
Kern River Valley Chamber of Commerce	Marsha Smith, President
Kern River Valley Revitalization	John Blythe, President
Kernville Chamber of Commerce	Jon Feldschau, President
KOA	Kimberley Kaleth, Owner
Lake Isabella and Bodfish Property Owners Association	Carol Rutledge, President
Midwest Mountain Engineering	Steve Pohl, Owner
National Forest Recreation Association	Marily Resse, President
Paradise Cove Lodge	Wes Williams, Owner
Piute Property Owners	Nathan Sciacqua Jr., Board
Recreation Outdoors Coalition	Sylvia Milligan, Founder and Chair
Rita DeAngelo Real Estate	Beck Star Harris

Rocky Mountain Adventure Riders
San Diego Adventure Riders
San Diego Mineral & Gem Society, Inc.
Santa Clarita Valley Trail Users
Scotts Performance Products
Sierra Forest Products
Sierra Responsible Riders
SoCal High School Cycling League
Stewards of the Sierra
Stewards of the Stanislaus
Tehachapi Mountain Trails Association
Trail Preservation Alliance
Western Heritage Alliance

Brian Nichols, President
Randy Lazar, Founder and Vice President
Lisbet Thoreson, Public Lands Representative
Ken Raleigh, President
Scott Forward, Owner
Kent Duysen, Owner
Mike McCarthy, Executive Director
Matt Grunell, President
Mike Wubbels, Executive Director
Barbara Mihovich, Executive Director
Brandon Griffiths, President
Don Riggle, President
Jerry Schickedanz, Chairman

cc: Mary Beth Hennessey, Regional Planning Team
Judi Tapia, Sierra Planning Team
Irina Ford, Sequoia Planning Team
Al Olson
Kern County Board of Supervisors
Tulare County Board of Supervisors
Congressman Kevin McCarthy
Congressman Devin Nunes

"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 3,300 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 3000 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"

Promoting Responsible Recreation & Environmental Stewardship