Preliminary "Need to Change" Public Feedback
Received through 1/24/2014, prior to public workshops

Comments are organized by "Need to Change" focus areas, numbered, and indexed by major themes.

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Vegetation, Resilience, Wildlife, and Fire

1. (Sierra specific) The areas identified in the Preliminary Need for Change document identify the immediate concerns and problems of decades of fire suppression, damages where restoration has been deferred because of continuous lawsuits, fuels build up and historic mismanagement. The catastrophic RIM fire has shown these practices have diminished air and water quality, riparian areas, habitat and much more. The Dinkey Creek Collaborative Landscape Restoration Strategy has addressed many of these issues. Studies of selected areas of the RIM fire will provide information for better management practices and the need for tree and brush removal. The forces of nature have not been recorded in detail earlier than the 1900s, but the environmental manipulation/practices by the Native Americans have proved that their practices allowed a robust forest to be maintained in its entirety by the annual slow fire regime. The Sierra Forest Plan has the abilty to "do something productive" by fostering the outcomes/direction of the Dinkey Creek Collaborative Landscape Restoration Strategy.

2. (Sequoia Specific) Allow non-Forestry persons to help in lessening excessive fuel loading in and around the monument Sequoias. Establish a guide sheet that establishes criteria to be followed. Individuals or group leader must be qualified to perform this task and acquire a forestry permit establishing the area to be worked in.

3. I like the wording under the heading --VEGETATION, RESILIENCE, WILDLIFE AND FIRE EMPHASIS AREA explaining the need to develop "integrated" resource management strategies to increase pace and scale of restoration and thereby overcome the "single species management approaches" in the 2004 Sierra Nevada Framework. I would offer that you should also be explicit and add streamside zones/riparian areas to this category that need a changed, integrated management strategy to address the current unhealthy, unsustainable condition.

   I look forward to participation in the "next steps" of getting from the "Need for Change" document to explicit changes to the 2004 Sierra Nevada Framework's rigid standards and guidelines that then can drive Sierra and Sequoia draft Plan Revision alternatives. Without

elimination of diameter limits (which are not grounded in any science), dramatic reduction in restrictions of management of Owl, Goshawk, and Fisher habitats and streamside/riparian zones, there will be no adaptive management and no increase in pace and scale of restoration. Without a dramatic increase in pace and scale to landscape scale projects, the Region will continue to have to face the fact that large wildfires now dominant the California Region's National Forests.

Eastside Vegetation, Resilience, Wildlife, Invasive Plants, and Fire

4. The need to minimize smoke impacts from controlled fires to downwind communities should be identified.

Wildland Urban Interface

Meadows

5. (Sequoia specific) Of all the various restrictions proposed in the Preliminary Need For Change Forest Plan Revisions, Region 5 Early Adopter Forests, potential restrictions as outlined in the Meadows Emphasis Area can have one of the most dramatic impacts on the ability of stock users to access the areas within the Sequoia National Forest. For that reason, we believe that any meadow restrictions should be very, very carefully evaluated and applied. Upon review of the Sequoia National Forest Assessment Chapter 8: Multiple Uses-Ranges reference list, we note the 3 recently published research reports concerning the determination of the effects of Livestock Grazing on Yosemite Toads are not included. All three of these reports share the same conclusion, which is that livestock grazing does not have a negative impact on Yosemite Toad populations and their habitat. In addition, they report that meadow health is primarily influenced by meadow wetness and hydrology, not stock use. We would like to add these three peer reviewed articles for your consideration when preparing grazing plans and potential stock use restrictions. We are concerned that grazing restrictions will have an adverse effect upon stock use in the backcountry. Meadow management plans can include grazing as a viable management tool. The three articles are:

   - Determining the Effects of Livestock Grazing on Yosemite Toads (Bufo Canorus) and Their Habitat: An Adaptive Management Study. Final Study Plan – 14 September 2007 Written by: B. Allen-Diaz, A. Lind, S. McIlroy, K. Tate With technical support from: C. Brown, W. Frost, R. Grasso, N. McDougald, S. Parks, and P. Stine.
   - Determining the Effects of Cattle Grazing Treatments on Yosemite Toads (Anaxyrus [=Bufo] canorus) in Montane Meadows. Susan K. McIlroy, Amy J. Lind, Barbara H. Allen-Diaz, Leslie M. Roche, William E. Frost, Rob L. Grasso, Kenneth W. Tate. Published: November 05, 2013 DOI: 10.1371/journal.pone.0079263.
   - Determining the Effects of Livestock Grazing on Yosemite Toads (Bufo Canorus) and Their Habitat: An Adaptive Management Study. Submitted to USFS Region 5 as fulfillment of Agreement Number 05-JV-052050-099 between USFS and UC Regents. Written by: B. Allen-Diaz, A. Lind, S. McIlroy, K. Tate, L. Roche. Published December 31, 2010.

Aquatic and Riparian

Sustainable Recreation

6. Please continue to allow rock collecting in the Sierra, Sequoia & Inyo National Forests. Rock collecting has historically been allowed and accepted in these California National Forests. The California Federation of Mineral Societies has a long established code of conduct which can be viewed @ cfms.inc.org. CFMS has in the past and will continue to work with and support the USDA Forest Service in our endeavours to preserve these national treasures. We promote the lapidary sciences in many ways. Please look at this web site.

7. (Inyo specific) I want to iterate the need for the emerging/currently stifled recreation activity known as fat biking/snow biking to be acknowledged and that the new management plan opens itself to allowing this activity on public groomed trails alongside Nordic skiers, snowmobiles, and hikers. I also want make sure that forest road closures in the existing network are considered to be rehabbed into singletrack mountain bike/non-motorized trails. Lastly, want to express the need for mountain biking, and fat biking/ snow biking to be considered as a top recreation activity in the Inyo. Currently it's not considered as such. But there is a strong and growing contingency of off-road cyclists- which will grow more as more opportunities and terrain become available. The new plan needs to be open and proactive to improving current trails and developing new trail systems.

8. Recreation must not be “incorporated into other resource objectives”. Recreation must stand alone, as it was identified as one of the three initial use of and reason for the development of the Forest Reserves and eventually the Forest Service.

9. The Forest Service promoted dispersed recreation in the past Forest Plan, yet there is no documented information on use provided in the Assessment document. Recreation choices are leaning to the need of more development of and maintained developed sites. The reality is Forest Service budgets are continuing to decline with much needed financial support for this use. Economics should drive this development in a “pay as you go” program to provide the financial basis for maintenance of developed sites. A yearly “adventure pass” could provide a source of funds. The Forest Service has acknowledged that 80% of the useable income is from special use permits; thereby a “pass” could provide the financial relief for maintenance. The Forest Service need to reach out to use groups for education to this end and to strengthen partnerships to meet this end.

10. (Inyo specific) In the INYO National forest there is terrain which is conducive to the three disciplines of the American Mountain Guide’s Association (AMGA): alpine, rock, and ski. In the Inyo there are also a variety of guides operating through permits granted to the companies they work for. There is currently no MANDATE that the guides who work for permitted operators have any level of training.

    Because the Inyo is not expert in evaluating the credentials of ski, rock, alpine, or mountain guides, I think it is in the best interest of INYO NP to require AMGA certification of accreditation for guides or guide services in order to work under permit in the INYO NP. This will, in effect, outsource the expensive and difficult work of evaluating potential permittees (in terms of their technical and professional competence) to the only source in the US qualified to do so, the American Mountain Guide's Association.

To give strength and credibility to my above argument that INYO NF should seriously consider requiring AMGA accreditation for individual guides or permitted companies we can look to our neighbor in the north; Canada. Canada's tradition of mountain guiding is longer than ours in the US by a number of decades, and began on a much more profession, solid grounding. The government of Canada requested, during the inception of the mountain guiding tradition, that the guides of Canada create a professional licensing and training organization to manage itself, and thereby relinquish the government of responsibility from having to do so itself. And that is exactly what happened. Highly trained guides, and some Canadians, were the ones who began the ACMG (Association of Canadian Mountain Guides). Canada's tradition of granting commercial guided access to mountains to internationally licensed guides is decades old and is highly successful there in protecting the invaluable natural resources and offering safe guided recreation to the public.

By granting commercial permits for our public lands to unlicensed guides, which is the current standard amongst most public lands, will put an increasing legal onus on the permit-issuing body (National Park Service, Forest Service, BLM, ect), and in effect will open the various land management agencies to increased liability for, in effect, offering guided access of public lands to people untrained and untested for the job. I fear that in the future that INYO NP will expose itself to great liability for doing so.

In fact the US is the only developed member-country of the IFMGA (Internation Federation of Mountain Guides Associations. THE only interantionally recognized organization which sets standards for the profession of mountain guiding. There are 23 member countries.) in which the government does not require a guide's license to guide people on its public lands. This fact alone should give the INYO NF pause to consider how and why it grants access.

Moving on the next issues. There are a number of very important impacts that are measurable and real, which happen when people recreate, guided or unguided, in the mountains. These impacts, as cited by Inyo NF include, but not limited to, decrease of ecosystem health, addition of invasive species, and degradation of water quality.

Those concerns give the INYO NF an even greater imperative to demand that all guides by licensed by the AMGA in order to work in the INYO. This is because these guides are the most effect stewards of the land who are trained in leave no trace (LNT) principles and practice them actively with their clients, in addition to educating the public they encounter in the mountains, either through direct interaction, or the very powerful effect of modelling best practices.

It is well documented that guided mountain activities are a huge part of the local economy and its support network in and around the Eastern Sierra. It would be detrimental to economy to decrease access to public lands for that industry. I would argue that the American public has a right to access the land, and they should be able to choose if they want to do that with a guide or without. I think the Inyo NF would benefit the most from focusing its organizational efforts of managing the quality rather than quantity of guided mountain activities. Focusing on quality ensures that whatever mountain activity is being guided, it will happen in a sustainable and proactive way that will benefit the ecosystem and the public user alike.

If INYO NP requires the AMGA license for guides operating of its public lands it will thereby address both the issues of quality and quantity of guided access because there are a limited number of licensed (a.k.a. certified) guides available to the public for this work. It is my recommendation that the INYO restructure its permit-issuing process to make the sole determining requirement a valid AMGA or IFMGA license, or aspirant AMGA guides who are

working under the direct supervision of a licensed guide. This training and licensing program is already well-established and managed by the AMGA licensed guides currently at work in the US. This would shift the entire legal liability of vetting guides or guide services to the only US organization which is capable of doing so, the AMGA.

IN CONCLUSION:

INYO NP would benefit from streamlining the complex and burdering commercial permit-issuing process.
INYO NP could relinquish itself from the responsibility of evaluating individual guides and guide services to the only organization in the US which is capable of doing so, and at an International Standard, the American Mountain Guides Association.
INYO NP's reliance on AMGA/IFMGA licensed guides would thererby decrease negative impact on the public land by utilizing the most highly trained, environmentally-sensitive guides available.
INYO NP's mandate of AMGA/IFMGA license for guides or guide companies would SIGNIFICANTLY REDUCE THE COST AND BURDEN OF ISSUING PERMITS for the INYO NP.
INYO NP's mandate of AMGA/IFMGA accredited guides or companies would naturally limit the number of guided user groups on the land, as opposed to creating some artificial limit.

11. (Inyo specific) Professional mountain guides represent a significant contribution to the "economic vitality and quality of life of local communities". In our role as stewards of wild mountain landscapes and in sharing the resource with a passionate and motivated public, we represent a limitless opportunity for further "integrat[ing] and incorporat[ing] sustainable recreation into other resource objectives." We provide, free of charge to the Forest Service, interpretation, risk management, and education in environmental and resource sensitivity. In order to maximize the above rural economic and resource objectives, the professional mountain guiding industry will benefit from increased access to commercial use permits. The current obstacles to acquiring a new commercial use permit are stifling economic growth and opportunities for creative and effective sharing of the Forest resources with the public. Again, opening opportunities for new commercial use permits meshes seamlessly with the fact that "the decline in agency budget... creates a need for collaboration between the Inyo NF and... outfitters and guides." (Inyo NF Draft Assessment. Pg 13) In streamlining the process of issuing new permit applications I ask that the Forest Service consider the credentials for professional mountain guiding established by the American Mountain Guides Association (AMGA). More and more guides, clients, and other land managers are recognizing and demanding AMGA certification and accreditation. Given the tight budget of the Agency, trusting in peer-reviewed mountain guide certification will save the agency funds and resources that would otherwise be spent investigating the safety and reliability of the companies and guides permitted.

    In the Draft Assessment (page 148), it is observed that "unmanaged recreation can negatively impact ecosystem health." Further, "development of rock climbing routes at newly discovered crags" is cited as an example of unmanaged recreation. The BACC represents an opportunity for a public-private collaboration in assisting the Forest in managing this sort of impact. All across the country, local climbing organizations and communities are effectively self-policing the impact of rock climbing. I suggest that the BACC can very effectively serve a similar role on the Inyo NF.

Finally, Eastern Sierra ice climbing represents yet another opportunity for the Agency to collaborate with partners in meeting increasing demand for engaging and technical recreation on the Forest.

12. Due to the continuing diminishment of access, we believe that the need for change should include enhanced access.

13. There is one thing that everyone who enjoys National Forest lands needs and that is Access. Driving on forest roads and trails is the main methods of access for all forms of recreation. Whether you are a hiker driving to the trailhead, a horseman towing stock to the trailhead, or a mountain biker driving to the trailhead, a fisherman driving to the creek, a kayaker driving to the put in or take out, a camper driving to your camping spot, an off roader, a rancher hauling stock, or forest staff managing forest lands- everyone uses roads and trails.

    They are especially important to those with disabilities, since in many cases motorized or wheeled vehicles may be the only way for them to enjoy their public lands. The Americans with Disabilities Act was updated in 2011 to address the need for access for the disabled on public lands.

    There is a high demand for motorized and mechanized recreation shared trails which have been the fastest growing forms of recreation. Together these two forms of recreation provide the largest economic impact and when driving for pleasure is included they are the most popular primary forms of recreation per the NVUM. The increasing trend toward adventure sports will likely add to the continued popularity of motorized and mechanized recreation.

    The Agency has reported that spending by recreation visitors in areas within 50 miles of national forests and grasslands amounts to nearly $13 billion each year. Those dollars sustain more than 224,000 full and part-time jobs. Recreation accounts for more than half of all job and income effects attributable to Forest Service programs.

    While a demand analysis has not been done in any Forest in Region 5 for either motorized or mechanized recreation, the demand for the multiple use trails they enjoy has not diminished and will likely increase in future. Closures or restrictions that cause a reduction of existing multiple use trails will concentrate use and potentially increase environmental impacts, as well as increasing maintenance costs.

    Through Wilderness and other designations a considerable amount of National Forest Lands has been closed to most forms of recreation other than horseback or hiking. In some Forests more than half the land has been closed to most forms of recreation. The remaining multiple use lands are where the majority of the public recreate and where off road vehicles use is allowed.

    Existing trails/areas were generally not planned, designed, nor constructed for OHV activities. Many areas that provided for trails/areas did not incorporate enough miles or enough challenge to adequately accommodate the OHV user. This has contributed to OHV management problems by not dispersing the use and not providing the full spectrum of challenge levels (easy through most difficult). This practice often resulted in resource damage as a result of overuse and development of new trails that do not exist on inventory records.

    Fixed date seasonal closures are not workable in some Forests because wet weather is unpredictable and most users' desire trail conditions following a rain when trails are firm and dust free. Negative effects from erosion can often be mitigated with proper trail design and special

features such as trail hardening. Dry weather use when trails are dusty is limited because of the amount of hot safety gear and dust.

Environmental litigation has caused management by courts which have little or no expertise in managing public lands. This is turn has caused analysis paralysis where the Forest Service is forced to analyze and re analyze in an almost endless loop that is cost prohibitive. The result is that few projects are implemented on the ground. Yet projects are needed to help promote forest health. Important projects include fuel load reduction and recreation management while allowing use to continue.

Nationally, Fire Suppression now consumes 41% of the entire Forest Service budget of which $1 billion goes to fire preparedness. Having the necessary equipment available and hiring retaining the crews is extremely costly. The fire crews frequently play volleyball while they're on standby waiting for the fire bell to ring. This huge cost burden is taking much needed funding from recreation and forest health projects. Getting more fuel reduction projects implemented on the ground would improve forest health and fire resilience and reduce the need for huge standby fire crews. It would also provide income and a renewable product.

The Forest Service of the US Department of Agriculture is dedicated to the principle of multiple use management of the Nations forest resources for sustained yields of wood, water, forage, wildlife and recreation.

While funding has fallen short of that necessary to maintain existing trails in many National Forests many grassroots motorized volunteer groups have stepped up and eliminated the deferred trail maintenance. In some cases the trails are in better condition than they have been for 30 years.

The multiple use trails maintained by volunteers provides great public benefit since they allow all forms of recreation. Money spent on multiple use trails and the efforts by motorized volunteers benefit everyone. Green Sticker funding from Off Road Vehicles provides the largest amount of funding to the Forest Service other than tax dollars. Dispersed recreation is less costly since no facilities need to be built or maintained. Loop trail opportunities should continue to be encouraged.

Recreation and tourism are vital to most rural economies. They depend on abundant access to National Forest Lands. Actions by public agencies to reduce or limit access to recreation on public lands have a direct and negative impact on the local economy. Limiting access by closing roads, campgrounds, RV parking, and trails negatively impact the surrounding communities.

Successful management of the OHV program is highly dependent upon a strong commitment by line officers and program managers. Without exception, in those areas where the Forest Service Review Team saw this commitment they also saw a successful program with less resource damage, more user enjoyment, and less public controversy. Where sufficient range of experience and challenge are provided, there was less indiscriminate cross-country travel and fewer enforcement problems.

The concept of Trail Capacity may be used to express the physical ability of a trail to withstand use or the rate at which a trail incurs wear that eventually results in the need for maintenance or replacement. "Trail Capacity" may also be used as an expression of the maximum number of recreationists that may use a given length of trail (usually one mile) in a given period of time (usually one day) and still meet user expectations for a particular type of wild land trail experience.

Forest plans should continue to encourage multiple use trail recreation and dispersed camping in order to continue to provide the public with this much desired opportunity and to provide for increased demand on National Forest Lands.

There has been too great a focus on environmental issues with little or no regard for the negative impacts to social and economic issues such as recreation trails. Abundant multiple use access to public lands provides a much needed opportunity for people to enjoy and connect with nature. To help achieve positive change to the current management direction we recommend the following:

- Update Recreation Opportunity Spectrum (ROS) so that multiple use land acreage remains at levels previously determined appropriate by the Forest Service in prior plans.
- Change ROS to reflect existing motorized and mechanized uses in areas that are not designated Wilderness in order to continue to provide multiple use recreation and prevent fragmentation of multiple use trail systems, as well as to prevent concentration of use with associated increased impacts. Changes to ROS can also help ensure that roads needed for management to reduce fire hazard and perform forest health projects are not closed.
- Fixed Date Season of use is not practical in southern or high desert Forests where the wet weather is extremely variable and unpredictable. Instead of Fixed Date Season of Use, blanket forest orders on specific trails where wet weather actually occurs and when wet weather is a real problem should be used. Instead of including a length of closure specify in the order to reopen when wet weather has ended.
- Reroute trails as needed to allow for proper drainage to reduce erosion and rutting.
- Provide for adequate trail/area identification or construction to make up for trails/areas which have been closed to traditional OHV use through changes to zoning and wilderness designation.
- On-going OHV planning efforts are needed to address the current statewide planning issues, which include the need for long distance touring opportunities, and the need to connect riding areas in a coordinated statewide trail system, In some units the corridors have been identified and completed and in others planning is just beginning. There needs to be continued regional involvement in the process.
- Among the specific issues to address in the 2008 California Outdoor Recreation Plan was the need to develop more areas and opportunities for off-highway motorized recreation.
- Streamlining permits for local special events and recreational use will increase local economies and jobs
- Roads need to be kept open as fire breaks and access routes for firefighting and forest health projects.
- Streamline environmental compliance: allow environmental review done under the California Environmental Quality Act (CEQA) to be used to meet the National Environmental Protection Act (NEPA) requirements where possible.
- Incorporate the concept of Trail Capacity to determine the need to build more trails in order to prevent impacts from overuse.
- Perform demand analysis for mechanized and motorized recreation.

14. It is critical that the Forest Service emphasize at these early stages of the planning process, its commitment to provide a superior trail system that will provide all trail users the kind of access needed to enable them to enjoy the fantastic lands that comprise these three forests. As an added benefit, more access creates more constituents who will support the Forest Service's goals.

There are far too few opportunities for mountain bikers to enjoy the incredible lands that comprise these forests, because the ones that do exist are frequently unknown, too isolated for appropriate use, or because there are others that simply do not exist. Keep in mind that mountain bikers need significant trail systems, with stacked loop trails and connections that can provide long rides. This is abundantly possible in the forests involved, with a few relatively simple approaches. These forest lands are large and wonderful, and can easily provide the opportunities needed. As will be seen, we will repeatedly suggest that these three forest plans set forth the Forest Service's determination to develop new trails for mountain bikers, to connect existing trails, and equally important, to highlight those that exist now. While we recognize that specific trail proposals should be considered later, at project levels, we do believe that this broad commitment must be stated now to provide a framework for future projects. As well, the need for an increased commitment to creating more mountain bike opportunities is that much greater because of the large percentage of lands in the three forests that are Wilderness, which prohibits bike use. It is critical that the remaining lands be examined for additional mountain bike use.

Managing trails based upon desired experiences, sustainable construction and maintenance, and suitability for the desired conditions of the area, rather than simply by mode of travel, would allow agencies to actually manage a trail system. Trails must be constructed or converted, to be sustainable recreation trails, rather than temporary extraction roads, firebreaks, hunting routes, or game trails repurposed as public access routes. A purposefully designed trail system is light on the land, showcases the landscape, steers visitors away from sensitive areas, and provides a broad range of experiences.

As a result of the Travel Management effort, numerous "roads" have been, or are being, removed from the system of motorized routes. The question will be in each case, what to do with them? While it is clear that some will be returned to nature, it is equally clear that a great number of them can be retained for other, non-motorized use. We strongly urge that the Inyo, Sierra, and Sequoia Forests continue examining these trails, and make serious commitments to transform such trails into single track trails for mountain bikes and other muscle-powered uses.

15. It is common knowledge, and reflected in the Assessments and the Preliminary Need For Change document, that our forests do not have enough funding to properly create and maintain their systems of roads and trails. We believe that a strong volunteer program, which includes many forms of partnerships between the agency and NGOs and non profit groups would go a long way to solving this problem. Clearly, these efforts get diverse groups involved and help the Forest Service carry out its mission. They involve our citizens, create in them a sense of ownership, and help turn them into stewards of our public lands. Importantly, we agree that these activities can go a long way towards embracing youth, low income groups and minority populations into our open spaces.

    For these reasons, we strongly urge that you support a vastly increased volunteer program, and reflect that in the plans. In many agencies, the current practice is to treat volunteer programs as a burden on the agency. Often it is said that excessive resources are required to train and manage volunteers, and that too much staff time is involved. We suggest that this approach is flawed. Instead, volunteer programs and partnerships should be viewed as integral parts of the structure of the forest. They must be understood as "systems", rather than as add-ons. Keep in mind that, while public agencies and private groups can each do a great deal, together, their synergy enables them to do much more than either could do alone. In this case, the whole is indeed, greater than the sum of its parts.

16. The USFS document entitled "A Framework for Sustainable Recreation" is important to the need to change conversation.

Other

17. During the previous meeting held at the Holiday inn, l asked why the need to change? I asked what was not working and what studies have been done to show the forest service position. No documentation was presented to demonstrate the need for change. Without this information l see no need to change.

18. Multiple Uses must be addressed throughout the document, pursuant to the Multiple Use Sustained Yield Act.

19. Permitting burdens should be identified as issues to be addressed.

20. (Inyo specific) Socioeconomics should be an emphasis area. In particular, the uniqueness of the eastern Sierra and the relative dependence of east-side communities on the INF should be addressed. The need for change should emaphasize developing public-private partnerships to enhance our communities and provide for economic resilience and vitality.

21. (Inyo specific) We believe that grazing should be emphasized, and that the need for change should include expanding managed grazing.

22. (Inyo specific) We know that services, infrastructure, and utilities are significant issues for the INF, and should be addressed at a programmatic scale in the Plan Update.

23. We acknowledge the document's references to sustainability, and request that this topic be emphasized to a greater degree.

24. The assumptions used as the basis of narrowing the scope of the process are inappropriate. There is no documentation in the Planning Rule that allows the agency, based on a shortened timeline, to not perform a complete analysis and address all the issues identified in the assessment. The idea that "not all changes must be addressed now" is not contemplated in the new rule. In fact the plan amendment process in the new rule contemplates that all issues identified at this stage of the planning process were addressed appropriately. The plan amendment process bases the amendment on "new information, changed conditions, or changed circumstances." [See Section 219.13(b)] Nothing in the plan amendment process suggests the agency will address identified areas of need for change based on information or circumstances previously identified by the agency which the agency did not have time to address due to a self-enforced timeline. The weakness of the process the agency has decided to pursue is not only that some areas of need for change will not be addressed but the alternatives analysis of those unaddressed areas will also not occur. This results in a substantially weakened need for change document.

25. Concerned that a need for change document that is supposed to address individual forest land management plans was not created. Instead, in the interest of time and efficiency, the forest service decided to publish a generic need for change document that is supposed to be used as a basis for revision of three forest land management plans. The criteria and recommendations drafted in the need for change document are so generic that they provide the individual forest managers with little or no direction on what changes should be considered when drafting a new plan. They also provide the public with almost no understanding of the issues that need to be addressed in the new land management plan. The public is left with the choice of drafting their own need for change document instead of reviewing and commenting on an agency proposed draft. The individual members of the public are not responsible for managing the forest pursuant to the current plan, reviewing all of the comments from the public and other government agencies

during the assessment phase, and of identifying those areas of emphasis that need to be addressed in the need for change stage of the planning process. This is the agency's responsibility, and the agency clearly did not perform its responsibilities during this stage of the process. The excuse that the agency does not have time to complete its responsibilities is unacceptable.

26. The timeframes for public comment are crazy tight, and almost contradictory or at least circular. There is no overall explanation of the planning process, no context of general purpose and scope of plan revision, how these documents on the website fit into that process and what decisions will be made in the revised plan. Additionally, there is no explanation of the various parallel processes and how they will be knitted up at the end---or not. The reader has to read all FAQ's at the end to know there even are several parallel processes, eg, timber and, I think but can't quite tell, disposition of IRA's. There needs to be a companion document that gives an overview of the whole planning process that will result in an integrated revised forest plan sufficient to support good decision making on the ground.

27. In both draft documents the single dispositive criterion governing scope appears to be the ridiculously short time frame allowed. How can anyone believe that "April to May 2014" is long enough to develop alternatives and plan components when the public meetings re: need to change are the very end of January? And this is supposed to be "collaborative" planning process under our new planning rule? Another important criterion appears to be whether there is controversy over our mgmt but general agreement on the solution. What exactly does anyone have in mind that fits this criterion? I can't tell how any of these criteria have been developed or how they will be applied to determine scope of the current revision. The picture becomes especially murky when I read that incrementalism is apparently encouraged---ie, we don't have to make all changes at once. When I put these things together--- tight time frame, incremental approach, parallel processes, no evaluation of current forest direction---- I conclude that the revised "plan" could well be nothing more than a fleshed out version of the current "themes". To me that means going back to the old multiple use plans whose basic logic at best was "if we are going to do anything, then we will probably do it thusly." The point I raise here is that the process for developing and applying criteria determining scope of the Sequoia NF's LMP revision is unclear. How can the criteria be revisited and then clearly applied so that the public understands what is going on?

28. (Sequoia specific) Roles and Contributions: I believe that saying "This varied landscape is critical in supporting biological diversity in the western US" (page 1) has just sealed the management of the entire forest---it's fine as long as everyone understands and agrees. I would have picked another word besides "critical" if only to give a little flexibility in certain situations. However, if we are going to use this "c word", we could use it also with respect to water: "Watersheds of the Sequoia NF drain into the Tulare Buena Vista Lakes Hydrologic Province and ARE CRITICAL (not "contribute") to municipal, agricultural, recreation, warm and cold freshwater habitat, groundwater recharge and freshwater replacement." If anything is critical right now to the human and biotic communities hereabouts it is WATER! Here is an opportunity to demonstrate that the NF's understand the relationship of NF lands to the neighboring private lands and communities.

29. The Need for Change should look at the forest plan in question and determine what needs to change going forward. This text is no help in that endeavor. First, its descriptions are so general as to apply to almost any forest in the state. Second, it makes no reference whatever to the existing Plan as amended. How is a member of the public acquainted with the land management plan supposed to understand anything at all about the scope of revision based on this textbook-like, hyper general, totally disconnected approach? That said, I see sweeping statements about the opportunity to eschew nasty ol' single species mgmt in favor of integrated, systemic,

collaborative planning……OK, but that flies in the face of the timeframe and the other criteria on page one. At best, this is confusing; at worst, contradictory and/or obfuscating.

30. These drafts suffer from lack of integration/consistency brought on by multiple authorship and little editing. The most relevant thing I can say is that as they stand, these drafts are not at all helpful in understanding the substantive scope and process of plan revision. Absent context, thorough rewriting and an evaluation of the existing plan, they are not ready for prime time.

31. The draft "Need for Change" document is very well written and strategically developed to only include those key focus items that must change for management of the Sierra, Sequoia, and Inyo NFs for the next 10-15 years. I say strategic because I know the Region recognizes that changes made in the Sierra and Sequoia forest plans, and particularly in the 2004 Sierra Nevada Framework, will lead to forest plan amendments or other mechanisms to adopt interim changes throughout the Sierra Nevada Mountains.

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This index was created by independent facilitators from the Center for Collaborative Policy (CCP), a unit of California State University, Sacramento. The purpose of the index is to identify major themes expressed in the public comments, to help members of the public quickly locate comments that address their interests. Every comment is more complex than the boiled-down themes; therefore, there are many ways the comments could have been categorized.

- The index represents CCP's best attempt to create a useful "at-a-glance" categorization system.
- This index is NOT intended to guide or limit how Forest Service staff consider public comments on the preliminary "Need to Change".
- Comments must be read in full to be understood.
- Numbers in the index refer to comment numbers, not page numbers.

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